

Prepared for Thomas Foods International

Independent Environmental Audit Report

Bourke Small Stock Abattoir – SSD 7268, EPL 90218

June 2026

Project Number: 260112

Document Control

Project Title: Bourke Small Stock Abattoir – SSD 7268, EPL 90218

Project Number: 260112

Project File Name: 260112 IEA Report_Draft v1.0_20260629

Revision	Date	Prepared by	Reviewed by	Approved by
Draft v1.0	29/05/2026	Will Weir	Nicola Smith	Will Weir
Final v1.0	10/08/2026	Will Weir	Nicola Smith	Will Weir

We acknowledge the traditional owners of this land and pay our respect to Elders past, present and emerging. We recognise that the First Nations peoples of Australia have traditionally managed the resources of this land in a sustainable way, and that they are the original stewards of the Australian environment.

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Acronyms and abbreviations

ACHMP	Aboriginal Cultural Heritage Management Plan
AWE	Department of Agriculture, Water and the Environment (Cwth)
AWS	Automatic weather station
BC Act	<i>Biodiversity Conservation Act 2016</i> (NSW)
BCS	Biodiversity, Conservation and Science Directorate
BSSA	Bourke Small Stock Abattoir
Biosecurity Act	<i>Biosecurity Act 2015</i> (NSW)
BOM	Australian Bureau of Meteorology
Dol	Department of Industry (Division of Resource and Energy, Biosecurity and Food Safety Unit) NSW
DP	Deposited plan
DPE	Department of Planning and Environment (NSW)
DPIE	Department of Planning, Industry and Environment (NSW)
EIS	Environmental impact statement
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i> (NSW)
ha	hectares
IMP	Irrigation Management Plan
km	kilometres
m	metres
MOD	Modification to Ministerial Conditions of
NSW	New South Wales
OEH	Office of Environment and Heritage (NSW), now EES
OEMP	Operational Environmental Management Plan
SSD	State Significant Development
TFI	Thomas Foods International
WasMP	Waste Management Plan
WWMP	Wastewater Management Plan
WatMP	Water Management Plan

Executive Summary

NGH (a Fyfe company) was engaged by Thomas Foods International Pty Ltd (TFI) to undertake an Independent Environmental Audit (IEA) of Bourke Small Stock Abattoir (BSSA), located approximately 14 kilometres north of Bourke, New South Wales. The purpose of the audit was to satisfy the Department of Planning and Environment (DPE) Ministers' Conditions of Approval (MCoA) that require an Independent Environmental Audit is undertaken within two years of the date of consent, and then every three years thereafter.

The third audit scope was developed by reviewing the MCoA's (SSD7268 MOD 5), Environmental Protection Licence (20918) and the Independent Audit Post Approval Requirements (2026).

The audit consisted of desktop document review undertaken offsite, onsite document review, site inspection and interviews. The offsite document review was undertaken prior to the site component of the audit with further request for information following the site inspection.

The site inspection component of the audit was conducted 20 May 2026. The audit period covered 26 May 2023 to 20 May 2026. This audit nine (9) non-compliances from a total of 106 triggered Ministerial Conditions of Consent. The audit further identified four (4) non-compliances with the EPL from a total of 76 triggered conditions.

TFI acquired Bourke Small Stock Abattoir on 17 December 2021 (with the processing of livestock recommencing on 19 September 2022). Conditions which required actions and/ or documentation to be submitted "prior to the commencement of construction" and similarly, those required to be submitted "prior to commencement of operation" were responsibility of the previous owner. Audit findings attracting a non-compliance status that were not relevant to TFI current operations have not been carried over in this audit and are either deemed compliant where corrective action has been undertaken or not triggered where no further action is required.

The document review found that Environmental Management Plans and sub plans were compliant with MCoA requirements, and they were generally being implemented on site.

Environmental performance is measured by regular environmental inspections. Two non-reportable environmental incident / complaints were noted for the audit period, one of which was outside of TFI's responsibility. Dangerous Goods storage was recorded as inadequate and requiring action to achieve compliance. Outside of this observation, the site was found to be generally well managed. The audit found that key elements of the Operation Environmental Management Plan were being implemented at site.

Additionally, the audit found Four opportunities for improvement, including one administrative suggestion. Further, based on the reported strength of the treated effluent brew and in the increase in likely irrigation volumes, consideration should be given to advancing the proposed cropping of the irrigation area. It is also recommended that environmental management plans are reviewed and updated in response to this audit and in readiness for operation of the new Skin Shed. The TFI website requires attention to ensure all requisite documents are published.

The key strength of this project remains the commitment from TFI to achieve compliance with the environmental management requirements and subsequently, to achieve sound environmental outcomes for its operations. The Environmental Advisor had a sound appreciation of these requirements with strong knowledge of the operation of the wastewater treatment system and irrigation management practices.

1. Introduction

NGH (a Fyfe company) was engaged by Thomas Foods International Pty Ltd (TFI) why to undertake the third Independent Environmental Audit (IEA) of its Bourke Small Stock Abattoir (BSSA) facility located approximately 14 kilometres (km) north of Bourke, NSW (Lot 17 DP 753546) on the Mitchell Highway. The purpose of the audit was to satisfy the Department of Planning and Environment (DPE) Ministers' Conditions of Approval (MCoA) for State Significant Development (SSD) 7268, inclusive of Modification 2, 3 4 & 5 (hereafter referred to as MCoA). The MCoA require that an Independent Environmental Audit is undertaken within two years of the date of consent, and then every three years thereafter.

1.1. Background

A development application and accompanying Environmental Impact Statement (EIS) for the project was submitted to the NSW Department of Planning and Environment (DPE; now Department of Planning, Housing and Infrastructure) and State Significant Development (SSD) consent for the small stock abattoir was approved by the DPE on 14 September 2016 (SSD 7268). Following this, a modification to SSD 7268 (MOD 1) was requested and subsequently approved by the DPE on 23 February 2017 to correct inconsistencies in the plans for the abattoir's layout. The site was constructed and commenced small scale operation by CAPRA Developments Pty Ltd (hereafter referred to as CAPRA) on 1 January 2019. Operations temporarily ceased, reportedly due to constraints including supply, economic and commercial matters and unanticipated impacts from COVID-19. The first Independent Environmental Audit (IEA) was undertaken in November 2019 and was commissioned by CAPRA. Notably, the first audit was not undertaken within two years of the date of consent (SSD 7268); as required under Condition D11, however, an amended audit period was agreed to by the DPE.

Since the last IEA the previous owner was required to undertake an environmental improvement program in line with the requirements of the Environmental Protection Licence (EPL 20918). During this time the abattoir was sold, with TFI acquiring Bourke Small Stock Abattoir on 17 December 2021. After undertaking further site works and commissioning activities, TFI recommenced the processing of livestock on 19 September 2022.

TFI sought a further modification to SSD 7268 (MOD 2), which was approved 10 October 2022. MOD 2 sought to:

- Remove the requirement and specifications for a mass carcass disposal pit to be constructed.
- Remove requirement for 900 mm compacted clay liner with permeability of less than 1×10^{-9} m/s in the stormwater dam.
- Remove requirement for rubber membrane liner for manure stockpile area and instead meet minimum design requirements for a leachate barrier system in Section 5.2 of the NSW Department of Environment and Conservation (DEC) (2004).

Further modifications were sought by TFI as follows:

- MOD 3 – Cold Store Expansion
- MOD 4 – Cold Store Expansion and Layout Amendments
- MOD 5 – New Shin Shed and building amendments.

The current consolidated conditions of consent were issued to TFI by the Department of Planning, Housing and Infrastructure on 14 November 2025. A variation to the EPL was also approved by the NSW EPA on 21 January 2025 to reflect changes associated with development modifications.

The TFI owned and operated small livestock abattoir has the approved capacity to process up to 6,000 head of livestock per day comprising goats, sheep and lamb. The facility may hold up to a maximum of 11,000 head stock at any one time. The abattoir facility consists of:

- Administration offices
- Car parking areas
- Internal roads and truck and washdown facilities
- Covered stock holding yards
- Livestock processing building
- Pump and workshop/stores shed
- Wastewater treatment system
- Treated wastewater Irrigation area.

The facility is located remotely from adjoining occupied landholdings and the township of Bourke. At the time of the audit, the abattoir was employing approximately 120 staff, including dedicated environmental and health and safety personnel.

1.2. Audit team

A team of environmental auditing professionals from NGH was approved for the audit by the Department of Planning, Housing and Infrastructure (DPHI, the Department) (refer Appendix B). Will Weir was approved as Lead Auditor and conducted the audit site inspection and interviews. Will has 30 years of experience as an environmental engineer, including Environment, Health and Safety compliance, assurance, and mergers and acquisitions due diligence auditing for complex infrastructure and natural resource projects, including numerous NSW State Significant projects.

Nicola Smith supported Will during the audit and provided technical review of this audit report. Nicola is an experienced environmental professional and Exemplar Global Lead Auditor and supported the audit preparation and desktop review.

1.3. Audit objectives

The objective of this Independent Audit is to assess compliance with the Ministerial Conditions of Consent (SSD7265 - MOD 5 consolidated consent) and Environmental Protection Licence (20918), in accordance with the requirements of the Independent Audit Post Approval Requirements (DPHI, March 2026).

1.4. Audit scope

The scope of the audit will include:

- An assessment of compliance of all the conditions of consent relevant to the works at the time of the audit (as detailed in Appendix C).

- An assessment of the adequacy and implementation of the site environmental management plans including:
 - C6 – Emergency Disposal and Biosecurity Disposal Protocol (EDBP)
 - C7 – Emergency Animal Disease Site Action Plan (EADSAP)
 - C7 – Q Fever Management Procedure
 - C20 – Waste Management Plan (WasMP)
 - C23B – Fire Safety Study
 - C35 – Wastewater Management Plan (WWMP)
 - C38 – Irrigation Management Plan (IMP)
 - C39 – Water Management Plan (WatMP)
 - C45 – Aboriginal Cultural Heritage Management Plan (CHMP)
 - D3 – Operations Environmental Management Plan (OEMP)
 - EPL 20918, Pollution Incident Response Management Plan (PIRMP)
- An assessment of performance of the project in relation to implementation of environmental plans.

The audit scope was developed by reviewing the SSD-7268 Conditions, EPL 20918 and the Independent Audit Post Approval Requirements (2026).

1.5. Audit period

The audit period covered 26 May 2023 to 20 May 2026, with a focus on operational activities, wastewater and irrigation management, and complaints / incident management.

2. Audit Methodology

2.1. Selection and endorsement of audit team

The proponent sought independent environmental auditor approval from the Department who approved Lead Auditor – Will Weir on 14/04/2026 with Nicola Smith approved as Support Auditor.

The Independent Auditor Declarations and Endorsement Letter for this third audit are provided in Appendix D

2.2. Independent audit scope development

The audit scope was developed by reviewing the SSD7265 - MOD 5 consolidated consent MCoA and EPL 20918 conditions, along with the requirements of the Independent Audit Post Approval Requirements (DPHI, March 2026).

The audit comprised of offsite document review; site inspection and onsite document review; and offsite audit analysis and reporting. An audit plan was provided to the auditee prior to the site audit detailing the timing of the audit and requirements regarding accessing the site and documentation.

2.3. Compliance evaluation process

The evidence-based compliance evaluation was conducted in accordance with Section 3.5 of the Independent Audit Post Approval Requirements (DPHI 2026). This scope was refined in consultation with the Department and other relevant agencies.

The scope generally includes Bourke Small Stock Abattoir's compliance with:

- Development Consent SSD7265 - MOD 5 consolidated consent
- EPL 20918
- Additional scope received from Agency and Department consultation requests.

The audit will be divided into two broad activities:

- Site and desktop audit of compliance against Conditions of Development Consent
- Site audit of implementation of environmental management plans and performance of environmental management system and controls.

2.4. Opening and closing meeting

An initial document review was undertaken prior to the audit. The document review included a review of the Conditions of Approval and all management plans and sub plans. The Audit Plan (NGH 2026) was submitted to TFI as the auditee on 29 April 2026 indicating the dates of the site audit, scope, criteria, audit details and required Project representatives.

An Opening Meeting was held on 20 May 2026 at 8:00am in the site office meeting room. Present at the opening meeting were:

- Lahiru Udage Arachchige (TFI – Environmental Advisor)
- Andrew Manning (TFI General Manager – Environment & Sustainability)

- Andrew Roberts (TFI – Operations Manager)
- Will Weir (NGH – Lead auditor).

A closing meeting was held on 20 May 2026 at 1:40pm to discuss the initial findings of the site audit. Present at the closing meeting were:

- Lahiru Udage Arachchige (TFI – Environmental Advisor)
- Andrew Manning (TFI General Manager – Environment)
- Will Weir (NGH – Lead auditor).

2.5. Audit interviews

Throughout the audit process, interviews were held with:

- Lahiru Udage Arachchige (TFI – Environmental Advisor)
- Andrew Manning (TFI General Manager – Environment)
- Andrew Roberts (TFI – Operations Manager)
- TFI Operational Personnel
- Will Weir (NGH – Lead auditor).

No interview requests were denied.

2.6. Site inspection

A site inspection was undertaken at 9am on 20 May 2026. The purpose of site visit was to undertake an inspection of current operational and construction activities on site including waste management, wastewater treatment and irrigation, environmental monitoring locations, site and access arrangements and gain an understanding of the remaining ongoing scope of works. No restrictions to access occurred during the site visit.

Conditions during the site inspection were damp. Zero millimetres (mm) of rain had been received at Bourke Post Office (048245) on the day of the audit inspection. However, the day preceding the audit, 33.8 mm of rainfall was recorded at this weather station.

Activities being undertaken at the site at the time of this audit inspection included:

- Operation of the Small Stock Abattoir
- Routine maintenance and inspections
- Transport of stock and deliveries
- Wastewater treatment
- Irrigation of wastewater (not occurring at time of audit)
- Civil earthworks in relation sediment pond (enlarging and spillway).

A selection of representative site photographs from the inspection are provided in Appendix E.

2.7. Consultation

As part of the audit, NGH and TFI consulted with the DPHI, to ascertain if there were any specific environmental issues that should be investigated during the IEA. Relevant regulatory stakeholders were also

contacted, those approached were agencies required to be consulted or to review and approve management plans required in the conditions of consent for the site. Specifically:

- NSW Department of Planning, Housing and Infrastructure (DPHI)
- NSW Environment Protection Agency (EPA)
- Transport for NSW (TfNSW)
- Bourke Shire Council (BSC).

Email responses from the consultation process are included in Appendix C and summarised in Section 3.8.

2.8. Compliance Status Descriptors

The compliance status for each requirement or commitment has been assessed in accordance with the criteria in Table2 (DPHI, 2026).

Table 2-1 Compliance Status Descriptors

Status	Description
Compliant (C)	The Lead Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the audit period.
Non-compliant (NC)	The Lead Auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the audit period.
Not triggered (NT)	A requirement has an activation or timing trigger that has not been met during the audit period (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

In addition, the audit team have made observations, including identifying opportunities for improvement in relation to compliance requirements and other aspect of the project.

3. Audit findings

3.1. Approval and Document list

The following documents were reviewed to check compliance with conditions or for implementation of plans. The documents relevant to this audit included:

Design plans and Approval documentation

- MOD 5 - Consolidated Consent SSD-7268
- Environmental Protection Licence (EPL 20918)
- SSD7268 -Bourke Abattoir - Mod 5 - Mod Report FINAL
- Modification Report Bourke Small Stock Abattoir - Modification 4
- Mod 3 Bourke Abattoir Cold Store Expansion
- Bourke Abattoir - MOD 2 - Liner Amendments
- Mod 1 – Plans and supporting documents
- 2016-03-03 SSD7268 Bourke Abattoir EIS

Correspondence

- Letter (dated 11 Dec 2024) - NSW EPA DOC24/901274, RE: EPIC Report EPA-23293 – Alleged Odour Complaint – 26 May 2024 Environment Protection Licence 20918 - Advisory Letter
- Letter (dated 23 Sept 2024) - RE: EPIC Report EPA- 23100 – Alleged Waste Dumping Complaint – 23 September 2024 Environmental Protection Licence 20918 - Advisory Letter
- Letter - Biodiversity Conservation Trust (BCT) - 2024 Annual Report (Ref: DOC25147138, dated 14th February 2025)
- Recipient Created Tax Invoices (BA00403 AMP3) and AMP00403 AMP3-1), BIODIVERSITY STEWARDSHIP PAYMENTS FUND, dated 12/03/2026
- Letter - Carpenter, Collins & Craig (CC&C), Proposed Small Stock Abattoir Bourke Internal Road & Carpark Design, 5 March 2020
- DPE Letter Bourke Small Stock Abattoir (SSD-7268-PA-15) - 2026 Independent Environmental Audit - Auditor Endorsement Request, 14/04/2026.
- Letter - Murrawarri Provisional Council of State, dated 1/07/2026

Reports and plans

- Updated Waste Management Plan (WasMP), (version 5, Feb, 2023)
- Updated Wastewater Management Plan (WWMP, version 4.0, Feb, 2023)
- Irrigation Management Plan (IMP)
- Water Management Plan (WatMP)
- Aboriginal Cultural Heritage Management Plan (ACHMP)
- Operational Environmental Management Plan (OEMP, Version 9.0, February 2023)
- Independent Environmental Audit (IEA), 2020 and 2023
- Annual Review (2023-2024)
- Annual Review (2024-2025)
- EPL Annual Return 2025
- Effluent System Commissioning Plan (version 3.0, Feb 2023)
- TFI Standard Operating Procedures (SOP) - Maintenance, SOP 03 - Chemical (5 March 2025)

- SOP 07 - Animal Welfare (30 October 2025)
- Emergency Disposal and Biosecurity Disposal Protocol (EDBP), Version 4.0, 22 February 2023
- Q Fever Management Procedure, Version 2.3 (WHS-S3E8-PRC18)
- TFI Bourke Chemical SOP V1/2023, 9 February 2023
- 2026 Draft Emergency Plan for Bourke Facility, dated April 2026
- Effluent System Commissioning Plan (version 3.0, Feb 2023)
- WWTP Commissioning Plan (Excel Spreadsheet).
- Procedure: Bourke Water and Wastewater Sampling Protocol

Certification, record, monitoring and Inspections

- AUS-MEAT - Evaluation for Certification, 17/02/2026
- AUS-MEAT Ltd certification, 1 September 2025
- AUS-MEAT Ltd certification, 24 April 2024
- SARAN Engineers and Managers dated 14 January 2017 - Dilapidation Report
- Summary Environmental Monitoring reports and data sets
- Waste Disposal Invoices (sample of 20 sighted for various waste stream)
- Construction Certificate No. CC 2017//0010/3
- Interim Occupation Certificate No. IOC 2017/001/02
- Construction Certificate No. CC 2017/0010/2/2
- Irrigation Survey 2.pdf
- Proposed Pivot Irrigation 2.pdf
- TFI Bourke - ENVIRONMENTAL MONITORING, SEPTEMBER 2025, Novembre 2024 and April 2024 (Premise)
- Samples of Form 1 - Environmental Checklist (completed)
- Novatherm Boilers and Combustion - checklist - sample of 22 completed daily and weekly inspection checklists.
- Monthly Refrigeration Checks
- Induction and training records
- Groundwater and Soil Monitoring Records - 2024/2025, 2025/2026
- TFI Bourke Environmental WQ Quality Results Monitoring records (April 23 to March 2026).
- Manure Quantities.xls

3.2. Compliance Performance

The Project was found to be non-compliant with 25 triggered conditions of approval (Table3-1). Some opportunities for improvement were also identified.

For the purposes of Table 3-1, if a Condition contained a part which is relevant, the whole Condition is counted as being relevant. Similarly, where a non-compliance was found with part of a Condition, the entire condition is considered non-compliant.

Table 3-1 Summary of compliance observed during the audit

	Schedule B	Schedule C	Schedule D	Appendix A	EPL	Total
Number of Conditions of Approval and EPL conditions	18	56	13	50	98	235
Number of triggered Conditions	13	38	11	44	76	182
Number of non-compliances	1	6	1	1	4	13

Note: In relation to the tally above whole conditions of consent have been used to generate the tally. i.e. where a condition contains part a), b), c) etc this has been counted as one condition.

3.3. Summary of agency notices, orders, penalty notices or prosecutions

The NSW EPA received a public report on 23 September 2024 alleging TFI was not managing animal waste, comprising of blood and animal parts, at the Premises in a competent manner. The EPA investigated the incident and determined that section 64 of the Protection of the Environment Operations Act 1997 (“POEO Act”) had potentially been breached. No further action beyond the Advisory letter was proposed.

The NSW EPA received a public report on 26 May 2024 alleging TFI was causing odour impacts to the community whilst transporting offal to the Walgett Waste Facility. This was deemed to be the responsibility of the licenced waste transportation company. Based on proposed corrective actions it was determined no further action was required.

3.4. Non-compliances

A total thirteen (13) non-compliance findings were recorded in the current audit from a total of 182 active conditions and requirements, mostly administrative and some ongoing from the previous audit.

These non-compliance findings, as well as their corresponding recommendations, are detailed in Table 3.2.

Table 3-2 2026 Audit Findings and Recommendations

Table 3-2 2026 Audit Findings and Recommendations				
#	Assessment requirement	Comment	Audit classification	Recommendations
Schedule B				
B2	The Applicant shall carry out the Development in accordance with the: (a) SSD 7268; (b) EIS; (c) RTS; (d) Management and Mitigation Measures (see Appendix A); (e) Development layout plans and drawings listed in the Register of Drawings (see Appendix B); and (f) Modification Assessments	TFI is generally conducting operations in accordance with SSD 7268 and other relevant requirements. However, some non-compliances were noted as detailed below. The audit therefore found TFI to be non-compliant with this condition.	NC01	TFI to undertake actions listed below relevant to each specific non-compliant item
Schedule C				
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 as detailed in Appendix A of this consent; (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; (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	The Annual Reviews describe current operational measures for the support of disease management, however no specific details are provided for measures for continuous improvement in disease management.	NC02	TFI to undertake Annual Review reporting as per this condition.

Table 3-2 2026 Audit Findings and Recommendations

#	Assessment requirement	Comment	Audit classification	Recommendations
	suppression, fencing) of the Development meets industry best practice for the control of disease as outlined in Appendix H of the EIS; and (g) details of measures for continuous improvement in disease management to be reported in the annual review required under Condition D7.			
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) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997). (d) 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.	The following observations were made on site during the 2026 audit inspection: - Chemicals stored in the main abattoir storage room included Class 3 (flammable) and Class 8 (corrosive) chemicals without appropriate segregation. Chemical placarding on the storage room doors did not reflect the chemical stored in the room. SDS were not present in the SDS folder. - The large external pump shed contained two Flammable 3 cabinets and a small Flammable 2 aerated cabinet. Segregation of Class 3 (flammable) and Class 2 (flammable gas), along with other chemical stored on pallet bunds needs to be addressed as was not considered by the auditor to be compliant with the relevant Australian Standards. Other combustible materials (i.e. cardboard boxes, rags) should also be kept clear of these storages. SDS in the SDS Folders did not reflect all chemicals in the storage room or storage shed. - A lithium-ion battery powered compressor (potential ignition source) was observed to be left sitting next to a Class 2 aerated cabinet containing LPG gas cylinders.	NC03	TFI to ensure Chemicals and Dangerous Good are appropriately stored and segregated on site.

Table 3-2 2026 Audit Findings and Recommendations

#	Assessment requirement	Comment	Audit classification	Recommendations
C23B	At least one month prior to the commencement of construction of SSD-7268-Mod-3 (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Planning Secretary may agree, the Applicant must prepare and submit for the approval of the Planning Secretary a Fire Safety Study for the entirety of the development. Pre-Commissioning This study must cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994). The study must also be submitted to Fire and Rescue NSW and meet the requirements of Fire and Rescue NSW. Note: To satisfy the requirements of Fire & Rescue NSW' above, the Applicant should provide confirmation in writing from Fire & Rescue NSW' that the Study meets the requirements of Fire & Rescue NSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline.	It is not clear if the FSS was provided to the Secretary, or within the stipulated timeframe. The auditor has not sighted the Fire Safety Study report.	NC04	FSS to be provided to the DPHI
C23C	No later than two months prior to the commencement of commissioning of SSD-7268-Mod-3, or within such further period as the Planning Secretary may agree, the Applicant must submit to the Planning Secretary a comprehensive Emergency Plan and detailed emergency procedures for the development. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.	No evidence of provision to the Secretary within two months prior to the commencement of MOD3.	NC05	Confirm and/or provide Emergency Plan to the DPHI

Table 3-2 2026 Audit Findings and Recommendations

#	Assessment requirement	Comment	Audit classification	Recommendations
C23D	Within twelve months of the commencement of SSD-7268-Mod-3 and every five years thereafter, or at such intervals as the Planning Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the development.	No comprehensive Hazard Audit/s of the development sighted by the auditor.	NC06	Confirm completion of / or undertake comprehensive Hazard Audit
C23E	Within one month of completing each audit carried out in accordance with condition 23D, the Applicant must submit a report to the satisfaction of the Planning Secretary for approval. 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.	As above, no provision of audit to the Planning Secretary.	NC07	As above
Schedule D				
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.	MOD 5 consolidated consent is not on the website. Complaints register not updated annually on website.	NC08	TFI to regularly update information on its website in accordance with the requirements of this condition.
Appendix A – Waste, wastewater and irrigation				
	Monitoring of vegetation will be undertaken on an annual basis and will involve visual assessments of crop species and bare areas to provide an indication of the presence of soil toxicities and soil degradation.	No cropping has been undertaken as set out in Section 2.6 of the IMP, no evidence of vegetation monitoring provided.	NC09	TFI to commence cropping and vegetation monitoring in irrigation area.

Table 3-2 2026 Audit Findings and Recommendations

#	Assessment requirement	Comment	Audit classification	Recommendations
EPL Section A1				
L3.1	For each discharge point or utilisation area specified below (by a point number), the volume/mass of: b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area (1550 kL/day)	The effluent irrigation has been recorded to exceed 1550 kilolitres per day on a number of occasions from 2024 onwards.	NC10	TFI to review effluent irrigation rates and manage as required.
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity;	The current audit found inadequacy with regard to the appropriate storage chemicals and dangerous goods on site.	NC11	TFI to segregate and store Chemical and Dangerous Goods in accordance with industry standards.
O7.2	All Toxic Chemicals must be stored in accordance with the requirements of AS/NZS4452- The Storage and Handling of Toxic Substances.	Chemicals in the abattoir storage room were stored with adequate bunding for the volumes present at the time of the audit. However, inappropriate segregation and placarding on the door was observed.	NC12	The auditor suggests that storage of chemicals is undertaken with appropriate segregation and external placarding.
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Signage at the entrance to the site includes a phone number (02 6865 4430) to contact site. The OEMP includes a complaints line (02 6865 0400). The auditor attempted to call the latter on 12/07/2026 and found this line to still be disconnected. Calling the number on the site signage refers you to a site administrator, who advised they were able to take a complaint, if needed. As there are presently conflicting phone numbers it is	NC13	TFI to establish and document a clear telephone complaints line for the purpose of receiving any complaints from members of the public.

Table 3-2 2026 Audit Findings and Recommendations

#	Assessment requirement	Comment	Audit classification	Recommendations
		not clear to the public, which is the complaints line, noting the site signage does not clearly indicate the number presented can be used to lodge a complaint. The OEMP has not been updated since the previous audit.		
M7.1	For each discharge point or utilisation area specified below, the licensee must monitor: b) the mass of solids applied to the area;	Mass of solids to land - no monitoring evidence provided for current audit period	NC23	Provide mass of solids to land data for the audit period, or ensure this information collected going forward.
U1.4	The licensee must submit a report including photographs documenting the completion of the works required by Condition U1.3 to the EPA prior to treated effluent being applied to the irrigation utilisation area.	No evidence of a report has been sighted by the auditor including photographs documenting the completion of the works.	NC24	Provide or prepare requisite report now that works have been completed.
U1.6	No more than 30 days after commissioning of the effluent treatment and irrigation system, the licensee must provide the EPA with a report summarising the outcomes of commissioning against expected results	No commissioning outcomes report has been sighted by the auditor.	NC25	Provide or prepare requisite report now that works have been completed.

Four new opportunities for improvement were identified during the operational audit inspection as discussed in Section 3.14.

3.5. Previous Audit Recommendations

The audit found eighteen (18) non-compliances from a total of 128 total Ministerial Conditions of Consent (SSD 7268). Of these 18 non-compliances, only eight (8) were current and remained the responsibility of TFI.

The audit further identified twelve (12) non-compliances with the EPL (20918), noting that only ten (10) of these were current for TFI to rectify. These non-compliances, as well as their corresponding recommendations, are detailed in Table 3-3 Previous Audit Findings.

Table 3-3 Previous Audit Findings

Table 3-3 Previous Audit Findings					
#	Assessment requirement	Comment	Audit classification	Recommendation	Status
Schedule B					
B2	The Applicant shall carry out the Development in accordance with the: (g) SSD 7268; (h) EIS; (i) RTS; (j) Management and Mitigation Measures (see Appendix A); (k) Development layout plans and drawings listed in the Register of Drawings (see Appendix B); and (l) Modification Assessments	TFI is generally conducting operations in accordance with SSD 7268 and other relevant requirements, however some non-compliances were noted as detailed below. The audit therefore found TFI to be non-compliant with this condition.	NC, current	TFI to undertake actions listed below relevant to each specific non-compliant item	Open
B15	Prior to the commencement of earthworks, the Applicant shall: (a) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (b) submit a copy of this report to the Secretary and relevant public authority.	Deemed non-compliant by findings of the previous Independent Environmental Audit (IEA, 2020). No further evidence was sighted by the auditor to demonstrate that the Dilapidation Report was provided by the previous site owner to the Secretary. The report is not held on the Major Projects Portal - Post Approval. The non-compliant finding was the responsibility of the former site owner.	NC old, previous owners	The non-compliant finding was the responsibility of the former site owner. However, TFI should consider providing this report to the DPE to close this out.	Open (improvement opportunity)
Schedule C					
C7	The Applicant shall ensure the following key Q-Fever controls are in place during the operation of the Development: (h) ensuring livestock is rested prior to transport to the	C7 (b) and (c) are not addressed in the Standard Operating Procedure (SOP). The auditor was advised	NC	TFI should update the most appropriate document (i.e. SOP) to address aspects b)	Open

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
	Development site as detailed in Appendix A of this consent; (i) 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; (j) the Meat Livestock Australia's guide "Is it Fit to Load?" is considered before livestock is transported to the Development site; (k) implementation of an immunisation program for all abattoir workers; (l) ensuring animal waste is removed from the Development in enclosed containers; (m) ensuring the design (i.e. irrigation, ventilation, dust suppression, fencing) of the Development meets industry best practice for the control of disease as outlined in Appendix H of the EIS; and (n) details of measures for continuous improvement in disease management to be reported in the annual review required under Condition D7.	that the site works with suppliers and transporters through the procurement process to ensure the requirement that stock are appropriately prepared for transport, and that this aspect is regularly communicated to suppliers. Animal resting is verified by the driver in the Stock Receipt Receipt and associated questionnaire.		and c) and ensure documentary evidence can be provided that suppliers and drivers have received adequate direction on the requirements for this condition. TFI to undertake Annual Review reporting as per this condition.	
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, Appendix I). The ecosystem credit shall be determined in accordance with the Framework for Biodiversity Assessment (OEH 2014) and the NSW Biodiversity Offsets Policy for Major Projects (OEH 2014).	This was deemed non-compliant in the previous IEA, 2020 due to the former site owner not meeting the stipulated timeframe for purchasing and retirement of Ecosystem Credits. DPIE (now DPE) highlighted in letter of 15/02/2021 that the previous IEA, 2020 had identified that the former development owner CAPRA Development Pty Ltd (CAPRA) had failed to purchase and retire the offset credits. CAPRA responded requesting a stay of proceedings due financial hardship, stating it would commit to making the outstanding payment upon	NC old, previous owners	Closed - no further action required.	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
		entering a binding agreement for sale of the BSSA. Some BCT receipts were able to be provided for two payments of \$89,611.34. BCT confirmed via email that of the 80% TFD required to reach active management: \$268,342.20 that the amount paid up to 13 July 2023 was \$266,964.09 (79.6%) leaving \$1,379.12 outstanding. The auditor was advised that TFI are working to finalise this payment. TFI have now completed the final payment to BCT.			
C18	Prior to the commencement of operation, the Applicant shall provide the Secretary and the EPA with documentary evidence, including a copy of any executed Waste Agreement(s), confirming it has 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.	Deemed not compliant in the previous IEA, 2020. General waste, including paunch is collected from site via Bourke Shire Council's waste contractor for disposal at the Council landfill. Council does not required a Waste Agreement for this service. All livestock processing waste is taken off-site to the TFI facility tin Tamworth for rendering. Manure from the dry swept yards and truck wash is temporarily stored on-site in a skip bin prior to land application on surrounding owned lands under the EPA Resource Recovery Exception. TFI operations are now considered to be compliant with this condition on the basis that general waste is managed appropriately, and other waste is beneficially reused rather than disposed.	NC old, previous owners	No further action required.	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
C20	Prior to the commencement of operation, the Applicant shall prepare a Waste Management Plan (WMP) for the Development to the satisfaction of the Secretary. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. The WMP shall: (a) be prepared in consultation with the EPA; (b) detail the type and quantity of waste to be generated during construction and operation of the Development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEO Act, Protection of the Environment Operations (Waste) Regulation 2014 and the EPA's Waste Classification Guideline; (d) detail the materials to be reused or recycled, either on or off site; and (e) include the Management and Mitigation Measures included in Appendix A.	Deemed not compliant in the previous IEA, 2020 due to the inclusion of paunch in the compostable waste stream. The updated TFI WasMP does not include paunch in the manure waste stream. The updated TFI WasMP adequately addresses the requirements of this condition.	NC old, previous owners	No further action required.	Closed
C22	Dangerous goods, as defined by the Australian Dangerous Goods Code, shall be stored and handled strictly in accordance with: (e) all relevant Australian Standards; (f) for liquids, a minimum bund volume requirement of 110% of the volume of the largest single stored volume within the bund; and (g) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997). (h) In the event of an inconsistency between the requirements listed from (a) to (c) above, the most	The following observations were made on site during the audit inspection: - Chemicals stored in the main abattoir storage room were appropriately banded and SDS were readily available. - The large external pump shed contained two Flammable 3 cabinets and a small Flammable 2 aerated cabinet. - One Class 3 Flammable cabinet was empty as it had previously been broken into and subsequently damaged.	NC, current	TFI to ensure Dangerous Goods are appropriately stored on site.	Ongoing

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
	stringent requirement shall prevail to the extent of the inconsistency.	- The Class 2 Flammable aerated cabinet was not being utilised at the time of the audit inspection. - The Class 3 Flammable cabinet in use was found to be storing Class 3 and Class 2 aerosols. This cabinet was also located immediate next to an operating pump and live battery terminals, representing a potential source of ignition. - Located next to the in use Class 3 Flammable cabinet were several plastic jerry cans of fuel that were not appropriately banded.			
C32	The irrigation area, four process wastewater treatment ponds, mass-burial area and the manure stockpiling area shall be banded to prevent clean stormwater run-off from entering these areas.	At the time of the audit inspection the auditor was advised that the irrigation area has been surveyed to optimise future drainage design. The large irrigation areas include a vegetation buffer at the up-gradient boundaries. The auditor was advised that proposed drainage design does not include an upgradient bund to prevent clean water run-off from entering these areas as is stipulated by this condition.	NC, current	TFI should review the current design of controls for the Irrigation Area and seek advice as to the adequacy of the proposed measures prior to implementation.	Closed
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.	Soil and Groundwater monitoring was undertaken just prior to the audit with the result later provided for consideration. The sampling was not technically undertaken in compliance with the EPL requirements. Refer EPL Condition M findings.	NC old, previous owners	TFI to further develop a comprehensive soil and water monitoring program to meet the requirements of the EPL.	Closed
C46	Prior to the commencement of operation, the Applicant shall compensate for the removal of one Gurri tree through:	The previous IEA, 2020 deemed non-compliant based on the lack of evidence provided by the previous	NC old, previous owners	TFI to source and plant the Gurri trees in accordance	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
	(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 locations 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. Documentation of consultation with the RAPs including the final location(s) of the trees shall be included in the ACHMP required by Condition C45 and provided to the Secretary prior to the commencement of operation.	development owner that the Gurri trees had been purchased or planted in accordance with the ACHMP. The auditor was advised that the Gurri tree saplings referred to in the IEA, 2020 have been traced by TFI to the previous owner of "Gidgee House", which has since moved to Mudgee, NSW. TFI are making efforts to regain these saplings. Alternatively, TFI will aim to acquire new saplings for planting.		with the ACHMP.	
Schedule D					
D7	Each year, unless otherwise agreed by the Secretary, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review shall: (a) describe the Development that was carried out during the reporting period, and the Development that is proposed to be carried out over the next reporting period; (b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous reporting period, which includes a comparison of these results against the: (i) the relevant statutory requirements, limits or performance measures/criteria; (ii) requirements of any plan or program required under this consent;	The Annual Review, 26 March 2021 did not meeting all the requirements of this condition. The DPIE approved a request for extension for the 2021 reporting period to align with the EPA Annual Return reporting schedule. As such Annual Reviews are to be report on the period 1 May to 30 April, with a submission date of 30 July each year. An Annual Review report for the period 1 May 2021 to 30 April 2022 being the responsibility of the to the previous development owner was not able to be sighted for this audit, hence the non-compliant finding. The 2022/2023 Annual Review was not triggered for TFI at the time of the site audit inspection. The auditor was advised that TFI is to seek an extension to the	NC old, previous owners	TFI to ensure the required upcoming and continuing Annual Reviews are completed and submitted to the Secretary at the required frequency.	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
	(iii) the monitoring results of previous years; and (iv) the relevant predictions in the EIS; (c) identify any non-compliance over the previous reporting period, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the Development; (e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next reporting period to improve the environmental performance of the Development.	deadline for this report to take into account the newly commenced operations and requisite monitoring requirements.			
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.	Reporting on Environmental Performance was not available on the TFI website at the time of the audit inspection. Some information regarding groundwater monitoring and wastewater quality monitoring was since been provided in Community and Corporate Responsibility page of the website.	NC, current	TFI to provide regular reporting on the environmental performance of the Development on its website in accordance with this Condition.	Open (improvement opportunity)
D10	The Applicant shall make the following information publicly available on its website and keep the information up to date: (f) the EIS; (g) current statutory approvals for the Development; (h) approved strategies, plans or programs; (i) a complaints register, updated on an annual basis; and	The EIS for the Development was not found on the TFI website at the time of the audit site inspection. The OEMP was on the TFI website, including current statutory approvals, sub-plans and the complaints line and complaints register. The website has since been update with the relevant information provided in Community and Corporate Responsibility page of the website. The auditor recommends separating out the Complaints Register from the OEMP as a standalone	NC, current	TFI to regularly update information on its website in accordance with the requirements of this condition.	Open

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
	(j) any other matter required by the Secretary.	live register to be updated annually. It is noted that no complaints had been recorded by TFI since the re-commencement of operation at the site.			
Appendix A – Biodiversity					
	Felling of hollow-bearing trees in the disturbance footprint will follow a two-stage clearing protocol, where surrounding non-hollow vegetation is cleared 24 hours prior to the hollow trees to allow fauna time to move	Deemed non-compliant in the previous IEA. This does not fall under the responsibility of TFI and as such no further action is required.	NC old, previous owner	No further action required.	Closed
Appendix A – Heritage					
	The identified Gurri tree (wild orange tree – <i>Capparis mitchellii</i>) will be avoided during construction of the site access road. Other Gurri trees identified within the project site will be managed in accordance with the approved Aboriginal Heritage Management Plan and in consultation with the RAPs.	Gurri Tree replacement has not yet been completed.	NC old, previous owner	TFI to source and plant the Gurri trees in accordance with the ACHMP.	Closed
Appendix A – Water resources					
	Areas disturbed as part of construction activities that are not part of the final footprint of the project will be promptly revegetated.	The audit found that areas disturbed as part of construction activities had not been promptly revegetated.	NC old, previous owner	TFI to continue to maintain vegetation cover over areas previously disturbed.	Closed
	Temporary erosion and sediment control structures used during construction will be regularly inspected and maintained.	During construction, it was found by the previous audit that this condition was not adhered to	NC old, previous owner	TFI to ensure erosion and sediment control measures are regularly inspected and	Closed

Table 3-3 Previous Audit Findings					
#	Assessment requirement	Comment	Audit classification	Recommendation	Status
				maintained (as relevant to stage of any future works).	
	Storage areas for all liquids will be appropriately bunded.	Several plastic jerry cans of fuel that were not appropriately bunded were located next to the in use Flammable 3 cabinet.	NC, current	TFI to ensure all storage areas for liquids are appropriately bunded.	Closed
EPL Section A1					
O5.1	All tanks and storage areas for drums containing material that has potential to cause environmental harm must be bunded or have an alternative spill containment system in-place. The bunding and/or spill containment systems must be properly designed, engineered, and constructed to be suitable for the material types and quantities stored therein in accordance with all appropriate standards, including Australian Standards (AS)1940 and AS1596.	Refer approval condition C22 finding – duplicated finding.	NC, current	TFI to separate and store Dangerous Goods in accordance with the requirements of this Condition.	Open
O7.1	All above ground storage facilities containing flammable and combustible liquids must be bunded in accordance with Australian Standard AS 1940-2004.	As above under O5.1 – duplicate finding.	NC, current	As above under O5.1	Closed
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	The dates of the sampling work (1-2 May 2023) are recorded in the draft report. The appended lab reports identify what samples were specifically collected over the two days. However, the time stamp for all samples in the lab report is 00:00. Ensure the final report contains the requisite time of sample collection if available.	NC, current	Finalise the Environmental Monitoring report with time samples were collected.	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns.	The audit found not all required sample points were sampled at the time of audit (refer Appendix B for detail). Groundwater sampling has only occurred at MW2, as MW1 was discovered to be damaged in the recent Premise monitoring event. The auditor recommends that this well is repaired or replaced to ensure future compliance with this requirement. This is considered by the auditor to be technically non-compliant. Soil sampling has been undertaken at Points 7 to 12 (referred to as SM1, SM3, SM4, SM11, SM10, SM9 and SM7) which relate to effluent utilisation area. No sampling was conducted at Points 13 to 15 that relate to background soil sampling areas. This is technically non-compliant with the requirements of this condition.	NC, current	It is recommended that a comprehensive sampling plan in accordance with the requirement of this EPL is further developed.	Closed
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.	Irrigation had commenced prior to the above monitoring event, albeit over a reduced small area in the middle of the Irrigation Areas.	NC, current	As above	Closed
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	No reference is made to the Approved Methods Publication or otherwise in the Environmental Monitoring report. The auditor suggests that the draft Environmental Monitoring report be updated to reference and demonstrate compliance with the Approved Methods	NC, current	As above	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
		Publication.			
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Signage at the entrance to the site includes a phone number (02 6865 4430) to contact site. The OEMP includes a complaints line (02 6865 0400). The auditor attempted to call the latter on 15 August 2023 and found this line to be disconnected. Calling the number on the site signage refers you to an site administrator, who advised they were able to take a compliant, if needed.	NC, current	TFI to establish a clear telephone complaints line for the purpose of receiving any complaints from members of the public.	Open
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.	As above	NC, current	As above	Open
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Annual Returns for the preceding period 2020-2021 were not sighted. This was the responsibility of the previous development owner.	NC old, previous owner	Closed. No further action is considered necessary as this was the responsibility of the previous owner.	Closed
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending	As above	NC old, previous owner	As above	Closed

Table 3-3 Previous Audit Findings

#	Assessment requirement	Comment	Audit classification	Recommendation	Status
	on the last day of the reporting period.				
U1.3	The licensee must undertake the installation of the works identified in the table below prior to treated effluent being applied to the irrigation utilisation area.	Low volume irrigation had commenced at site at the time of the audit as part of commission of the system. Temporary travelling irrigators were in use over a small central portion of the broader Irrigation Area. b) and c) had not been completed at the time of the audit, awaiting a detailed survey to best achieve the required drainage outcomes.	NC, current	TFI to continue with the implementation of the requisite controls in the Irrigation Areas.	Closed
U1.4	The licensee must submit a report including photographs documenting the completion of the works required by Condition U1.3 to the EPA prior to treated effluent being applied to the irrigation utilisation area.	Refer above	NC, current	TFI to submit a report including photographs upon completion of the works required by Condition U1.3 to the EPA.	Closed
U1.7	The licensee must inform the EPA of recommencing the undertaking scheduled activity of livestock processing activities at the premises within seven days of recommencing on-site operations.	As above	NC	As above	Closed

3.6. EMP, Sub-plans and Compliance Documents

A summary of the implementation of key management plans relevant to this stage of works is provided below.

All plans required by the approval are discussed in the audit protocol table provided in Appendix A of this report. The suite of environmental management plans are summarised in the following sections.

3.6.1. Waste Management Plan, Schedule C, Condition 20

Operational activities with the potential to generate waste at BSSA are monitored fortnightly by TFI Environmental Advisor. The audit found that housekeeping was generally good, and mitigation measures identified in the Waste Management Plan were generally adhered to, with good waste segregation and storage practices. Waste streams were being disposed of appropriately, including reuse of animal waste products for rendering at TFI Tamworth, NSW facility, and land application of manure at the Bourke facility.

General waste continues to be collected from site via Bourke Shire Council's waste contractor for disposal at the Council landfill. All livestock processing waste was noted as being taken off-site to the TFI facility in Walgett for rendering. Manure from the dry swept yards and truck wash is stockpiled on-site in a concrete bay prior to land application on surrounding owned lands.

Waste management has also been reported on annually, as described in Annual Reviews (2023, 2024 and 2025).

At the time of the audit inspection recycling contractors were removing large amounts of metal scrap from the laydown area at the rear of the site.

3.6.2. Wastewater Management Plan, Schedule C, Condition 35

The mitigation measures identified within the Wastewater Management Plan were observed as generally being upheld across the site during the site inspection component of the audit, with the Wastewater Treatment system noted as continuing to be well maintained. This is further verified by the regular environmental inspections undertaken by the TFI Environmental Advisor.

The wastewater data for reporting period demonstrate that analyte levels are recorded to be typically consistent. pH tends toward neutral to alkaline (pH7-8) with conductivity typically in the range 3500-4500 uS/cm. Total Nitrogen at 200-300 mg/L and Phosphorous >20 mg/L places these nutrients in the high strength range for classification of effluent for environmental management (Refer Table 3.1 of Environmental Guidelines – Use of Effluent by Irrigation, DEC NSW), while BOD is the medium strength range.

The site inspection observed TFI operations being closer to the approved levels of stock throughput. The audit noted that with wastewater volume increases, the site has moved to a centre-pivot irrigator located in first of two zones of the approved irrigation area. The irrigation area was level surveyed to enable optimisation of surface water controls, which were now in place.

The audit found that wastewater, groundwater and soil monitoring had all continued across the audit period. Monitoring reports have been completed with monitoring now compliant with the EPL requirements.

The wastewater treatment ponds were observed to have adequate freeboard and remain appropriately bunded to prevent clean water runoff entering ponds. The active irrigation area had diversion drains and bunding to prevent water on-flow and out-flow of irrigated effluent water.

There was no evidence of pooling or runoff of effluent at the time of the audit. No cropping had been commenced at the time of the audit. Effluent irrigation data suggests that application of irrigated effluent to land has exceeded the allowable daily volume on numerous occasions.

Noting the strength of the treated effluent brew and in the increase in likely irrigation volumes, consideration should be given to advancing the proposed cropping of the irrigation area.

3.6.3. Irrigation Management Plan, Schedule C, Condition 38

Irrigation is undertaken in the approved Irrigation Area. Requisite controls (i.e. drains, diversion berms and sumps) have been installed.

Monitoring points within the Irrigation Area were clearly delineated and EPL monitoring is being undertaken. The previous soil data and interpretation suggest that soil across the irrigation area presents values of pH reflecting moderate to very strongly alkaline conditions. There was commentary that high alkalinity values across the Irrigation Area may be well suited to application of more acidic effluent to lower pH levels and improve potential crop growth. Recommendations were made of other relevant potential soil treatment / crops in order to manage nutrients. No cropping had been undertaken to the date of the audit inspection.

3.6.4. Water Management Plan, Schedule C, Condition 39

The WMP was being implemented at the time of the audit. At the time of the audit improvement to the site sediment control dam and associated spillway were underway. Groundwater monitoring is ongoing and reported in the Annual Reports. No recorded surface water discharge from site during the audit period. The MOD5 earth works underway at the time of the audit were being adequately managed with regard erosion and sediment controls.

3.6.5. Aboriginal Cultural Heritage Management Plan, Schedule C, Condition 45

Most aspects of the ACHMP have been implemented, with the exception of the final planting of Gurri trees.

The audit found that the Gurri tree saplings have not yet been planted. TFI have continued to make efforts to regain or replace saplings. In the event these saplings cannot be located and planted, TFI will be required to acquire new saplings for planting or come to an alternative agreed / approved solution.

3.6.6. Operational Environmental Management Plan, Schedule D, Condition 3

The OEMP was generally adequately implemented, with good housekeeping and mitigation measures identified in the OEMP generally adhered to and regularly monitored. The audit did find inadequate storage of chemicals and dangerous goods at site.

3.6.7. Site Inspections, incidents and other records

The audit found that regular Environmental Inspections continue to be carried out along with other plant and equipment inspections including the wastewater treatment system and irrigation components. There was

evidence that actions were being tracked through to close out. Records are maintained in hard copy form, along with on-line systems to track wastewater and irrigation, and meteorological data.

During the audit site inspection component, observations were made, which require rectification (refer Table 3-2, Condition C22 above for more detail).

There were two reportable environmental incidents for the audit period as notified to the NSW EPA.

3.6.8. Stakeholder, community engagement and complaints

The TFI website provides the community access to Project information, noting that not all documents and information were on the website at the time of the audit inspection.

Contact details were also found on the website, however signage at the entrance to the site includes a phone number (02 6865 4430) to contact site that still differs to the complaints line (02 6865 0400) listed in the OEMP. The audit found this latter line remains disconnected. Calling the number on the site signage refers you to a site administrator, who advised they were able to take a complaint, if needed.

As there are presently conflicting phone numbers regarding complaints, it is not clear to the public, which is the complaints line, noting the site signage does not clearly indicate the number presented can be used to lodge a complaint. It is noted that when viewing the website, although listing details of who to contact within the business, it is not immediately evident how to lodge a complaint. Adding detail on who to contact within the business for information and/ or to lodge a complaint, is recommended.

Two complaints were indirectly received via notification to the NSW EPA during the audit period.

3.7. Environmental performance

Environmental performance was largely measured by regular environmental inspections. The regular inspections showed a general trend of sound environmental management practice. However, two reportable environmental incidents / complaints were recorded for the audit period. Dangerous Goods storage was noted to require attention, as detailed above in Section 3.4.7. Outside of these observations, the site was found to be generally well managed. The audit found that environmental inspections were occurring and key elements of the OEMP were being implemented at site. The TFI Environmental Adviser has strong knowledge of the requisite management and mitigation measures, including the wastewater treatment system and irrigation aspects.

3.8. Consultation Outcomes

In endorsing the Audit Team, the DPHI requested that there be a focus on the effluent treatment system. At the time of reporting no response to consultation had been forthcoming.

3.9. Complaints

Two complaints were recorded during the operational audit reporting period in notifications to the NSW EPA.

The NSW EPA received a public report on 23 September 2024 alleging TFI was not managing animal waste, comprising of blood and animal parts, at the Premises in a competent manner. The EPA investigated the

incident and determined that section 64 of the Protection of the Environment Operations Act 1997 (“POEO Act”) had potentially been breached. No further action beyond the Advisory letter was proposed.

The NSW EPA received a public report on 26 May 2024 alleging TFI was causing odour impacts to the community whilst transporting offal to the Walgett Waste Facility. This was deemed to be the responsibility of the licenced waste transportation contractor. Based on proposed corrective actions it was determined no further action was required.

3.10. Incidents

The two complaints above led to investigation by the NSW EPA that were not considered to be notifiable incidents.

3.11. Actual verses predicted impacts

The Bourke Small Stock Abattoir Environmental Impact Statement (EIS) provides an assessment of the environmental impacts of the Project. The BSSA operations to date appear to be being undertaken in a manner which reflects the predicted impacts of the operation. No site-based noise, lighting or odour issues have arisen and water management and monitoring are aligned with the expected outcomes at the time of the audit.

Traffic management outcomes appear to have been achieved as the site grows closer to its maximum allowable throughput.

3.12. Site inspection

The site inspection included all boundary conditions and surface water management aspects including, effluent irrigation, erosion and sediment controls, and material storage and handling. The project operations have been developed with all key environmental controls in place with the exception of active cropping of the effluent irrigation area.

The wastewater system is operating and well maintained, and the first stage irrigation area has been developed. While stock is excluded from the irrigation area, an abundance of wildlife was seen present during the site inspection. The auditor was advised that efforts are made to move wildlife prior to irrigating. This will likely present a challenge for active cropping of the effluent irrigation area.

During the site inspection, the main sediment dam was being enlarged and improvements made to the spillway. In addition, early works for the new Skin Shed were underway. Both earth work projects appeared to be adequately managed in relation to erosion and sediment controls.

An area requiring attention was identified with regard to chemicals and dangerous goods storage, segregation and soft controls (SDS and placarding).

The stock yards, waste management and clean down areas for the abattoir appeared well-managed and no significant odour was observed from the external operations. At the time of the audit a large amount of metal waste was being removed by a recycling contractor from the laydown area at the rear of the site.

All external trafficable areas, including access roads and parking are well laid out and operating as per Traffic Management requirements.

3.13. Site interviews

Site interviews were conducted with the Environmental Advisor, Operations Manager and General Mager – Environment, along with several operational personnel. The Environmental Advisor maintains primary responsibility for the day-to-day management and upkeep of the environmental requirements, including wastewater management and irrigation of effluent. The Environmental Advisor was well aware of the key ongoing environmental management aspects, including but not limited to surface water management, erosion and sediment control, traffic management and on-site parking and noise validation monitoring for operation.

Requested documentation and audit evidence was readily provided prior to the audit, during the site inspection and post the site inspection.

3.14. Opportunities for improvement

Three improvement opportunities were identified during the operational audit as follows:

- TFI should consider providing the 2017 Dilapidation Report to the DPHI to close condition C15 out.
- The auditor suggests that the suite of historic Annual Reviews as reviewed for this audit be provided on the website.
- The auditor suggests that the environmental monitoring programs and Environmental Monitoring reports be regularly reviewed to ensure compliance with the Approved Methods Publication or otherwise approved method.
- Commence cropping of the effluent irrigation area to complete the adequate treatment of effluent.

Appendix A - Independent Audit Table

Development Consent and EPL Compliance Status - May 2026

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Reference	Approval or licence requirement	Evidence Collected	Audit Finding - May 2026	Compliance status	Unique Identification Noncompliance
Development Consent (SSD 6422)					
Schedule B - Administrative Conditions					
Obligation to minimise harm to the environment					
B1	In addition to meeting the specific performance criteria established under this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the Development.	Site Inspection	The site appeared to be well managed with ongoing effort to management improve environmental performance evident. The Environmental Adviser was very knowledgeable in relation current and proposed environmental controls for the site. Some opportunities for improvement have been identified in this audit, however effort to minimise the potential for any harm to the environmental appeared to be regarded as important to the successful operation of the site.	Compliant	
Terms of consent					
B2	The Applicant shall carry out the Development in accordance with the: (a) SSD 7268; (b) EIS; (c) RTS; (d) Management and Mitigation Measures (see Appendix A); (e) Development layout plans and drawings listed in the Register of Drawings (see Appendix B); and (f) Modification Assessments	This Independent Environmental Audit (IEA)	TFI is generally conducting operations in accordance with SSD 7268 and other relevant requirements, however some non-compliances were noted as detailed below. The audit therefore found TFI to be non-compliant with this requirement.	Non-compliant	NC01
B3	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	Noted	Noted	Not triggered	
B4	The Applicant shall comply with any reasonable requirement(s) of the Secretary arising from the Department's assessment of: (a) any reports, plans or correspondence that are submitted in accordance with this consent; and (b) the implementation of any actions or measures contained within these reports, plans or correspondence.	Operational Environmental Management Plan (OEMP, Version 9.0, February 2023)	As discussed below, TFI previously updated its suite of management plans to align with MOD 2 to the Development consent to the satisfaction of the Secretary. The OEMP and sub-plans are being implemented for the operation of the abattoir.	Compliant	
Limits of consent					
B5	This consent lapses five years after the date from which it operates, unless the Development has physically commenced on the land to which the consent applies before the date on which the consent would otherwise lapse under section 95 of the EP&A Act.	Independent Environmental Audit (IEA, 2020)	The development was physically commenced within the stipulated timeframe.	Not triggered	
Abattoir operations					
B6	The Applicant shall ensure: (a) the Development site holds no more than a maximum population of 11,000 livestock at any one time;	Operational Environmental Management Plan (OEMP, Version 9.0, February 2023) Independent Environmental Audits (IEA, 2020 and 2023) Operation Statement (dated 31/12/2020)	Ongoing operations at the abattoir during the audit period recorded processing of smaller numbers of livestock than the threshold and subsequently stock holding numbers at any one time are significantly lower than the stipulated maximum.	Compliant	
	(b) the Development processes no more than a maximum of 6,000 livestock per day;	Daisy Production Support - (2985) - [Slaughter Enquiry] Site Inspection	The auditor sighted the TFI database records for daily livestock production for the current operations. Stock processing at the time of the audit was in the order of approximately 4,500 livestock per day, with maximum throughputs recorded at just over 5,000 during the audit period. The auditor was advised that the operations were aiming to further increase throughput.		

	(c) the Development processes no more than a maximum of 375 tonnes of processed skins per annum; (d) the stocking densities of the Development complies at all times with the standards detailed in the National Animal Welfare Standards for Livestock Processing Establishments 2nd edition, Meat and Livestock Australia, 2009; and (e) the operation of the Development is consistent with the relevant best practice guidelines and standards including the Australian Standard for Hygienic Production and Transportation of Meat and Meat Products for Human Consumption (AS 4696:2007).	Interview - L Udag Arachchige , A Manning AUS-MEAT - Evaluation for Certification, 17/02/2026. AUS-MEAT Ltd certification, 1 September 2025 AUS-MEAT Ltd certification, 24 April 2024 TFI Standard Operating Procedures (SOP) - Maintenance, SOP 03 - Chemical (5 March 2025), SOP 07 - Animal Welfare (30 October 2025)	No skin processing had been undertaken at the time of the audit. Industry Animal Welfare Standard for Livestock Processing Establishments certification held by site (the scope of certification: Goats and Sheep, May 2023). An evaluation of the performance against industry standards and meeting the requirements of AUS-MEAT Accreditation confirmed compliance with certification. TFI SOPs address standards for hygiene and transportation of meat products. Bourke abattoir is an Export Registered Establishment.		
B7	This consent does not provide for the disposal of livestock processing waste by on-site composting. Livestock mortalities and livestock processing waste shall not be disposed of to land by burial or any other method at the site, for the life of the Development, unless otherwise permitted by a relevant authority during a bio-security/mass mortality emergency at the site as determined by Condition C6. <i>Note: Any proposal for on-site composting of livestock processing waste and/or livestock mortalities shall be the subject of a separate application under the EP&A Act.</i>	OEMP Site Inspection Interview - L Udag Arachchige , A Manning	All livestock processing waste is trucked off-site for rendering at the Thompson Foods International facility in Walgett NSW.	Compliant	
Staged submission of plans and programs					
B8	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and/or (b) combine any strategy, plan or program required by this consent.	IEA, 2020 Operational Environmental Management Plan (OEMP, Version 9.0, February 2023)	Deemed compliant by findings of the previous Independent Environmental Audit (IEA, 2020). No further staging has occurred. The OEMP and associated plans were updated to address changes of the approved Modification (MOD 2) to the development approval. The approved OEMP includes appended management plans, while some aspects are dealt with directly in the OEMP.	Compliant	
B9	If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program shall clearly describe the specific stage to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program. A clear relationship between the strategy, plan or program that is to be combined shall be demonstrated.	IEA, 2020	Deemed compliant by findings of the previous Independent Environmental Audit (IEA, 2020). No changes to staging during the current audit period.	Compliant	
Evidence of consultation					
B10	Where consultation with any public authority is required by the conditions of this consent, the Applicant shall: (a) consult with the relevant public authority prior to submitting the required documentation to the Secretary or the certifying authority for approval, where required; (b) submit evidence of this consultation as part of the relevant documentation required by the conditions of this consent; and (c) include the details of any outstanding issues raised by the relevant public authority and an explanation of disagreement between any public authority and the Applicant or any person acting on this development consent.	OEMP - Appendix K Agency Consultation	Agency consultation was undertaken in relation to the update of the OEMP in support of the proposed modification to the development approval (MOD 2) and in documented in Table K1 of the OEMP. Consultation evidence was provided in support of MOD3 MOD 4 and MOD5. No outstanding issues were raised through the consultation process.	Compliant	
Dispute resolution					
B11	In the event that a dispute arises between the Applicant and Council or a public authority, in relation to an applicable requirement in this consent or relevant matter relating to the development, either party may refer the matter to the Secretary for resolution. The Secretary's determination of any such dispute shall be final and binding on the parties.	Interview - L Udag Arachchige	The auditor was advised by the Environmental Advisor that no disputes have arisen.	Not triggered	
Statutory requirements					

B12	The Applicant shall ensure all licences, permits and approvals/ consents are obtained and kept up to date as required throughout the life of the Development. No condition of this consent removes the obligation of the Applicant to obtain, renew or comply with such licences, permits or approvals. <i>Note: The Applicant is required to obtain the relevant license/approval from Council under section 68 of the Local Government Act 1993 prior to the commencement of construction for all domestic effluent disposal and management systems on-site.</i>	SSD 6422 (MOD 5) EPL 20918	BSSA hold current development approval and a environmental protection licence to operate, along with other requisite livestock processing certification (refer B6 above).	Compliant	
Structural adequacy and certification					
B13	The Applicant shall ensure all new buildings and structures, and any alterations or additions to existing buildings and structures are constructed in accordance with the relevant requirements of the BCA. <i>Note: Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Development.</i>	IEA, 2020	Deemed compliant by findings of the previous Independent Environmental Audit (IEA, 2020). The new Skin Shed as approved under MOD 5 was in the very early stage of construction (earthworks) at the time of the recent audit inspection.	Compliant	
Utilities and services					
B14	Prior to the construction of any utility works associated with the Development, the Applicant shall obtain relevant approvals from service providers.	IEA, 2020	Deemed compliant by findings of the previous Independent Environmental Audit (IEA, 2020).	Compliant	
Protection of public infrastructure					
B15	Prior to the commencement of earthworks, the Applicant shall: (a) prepare a dilapidation report identifying the condition of all public infrastructure in the vicinity of the site (including roads, gutters and footpaths); and (b) submit a copy of this report to the Secretary and relevant public authority.	IEA, 2020 NSW Major Project Portal - Post Approval SARAN Engineers and Managers dated 14 January 2017 - Dilapidation Report	Deemed compliant by findings of the previous Independent Environmental Audit (IEA, 2020). Deemed non-compliant by findings of the previous Independent Environmental Audit (IEA, 2023). No further evidence was sighted by the auditor to demonstrate that the Dilapidation Report was provided by the previous site owner to the Secretary. The report is not held on the Major Projects Portal - Post Approval. The non-compliant finding was the responsibility of the former site owner. However, TFI should consider providing this report to the DPHI to close this out.	Not triggered	
B16	The Applicant shall: (a) repair or pay the full costs associated with repairing any public infrastructure that is damaged by the Development; and (b) relocate or pay the full costs associated with relocating any infrastructure that needs to be relocated as a result of the Development.	IEA, 2023 Interview - L Udage Arachchige , A Manning	No public infrastructure repair requirements triggered during the current audit period. No public infrastructure relocation requirements triggered during the current audit period.	Not triggered	
Compliance					
B17	The Applicant shall ensure that employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	Operational Environmental Management Plan (OEMP, Version 9.0, February 2023) Interview - L Udage Arachchige , A Manning Training Matrix - Database system (iLeader) and sample of personnel reports	Section 2.5 of the OEMP adequately addressed Inductions and Training including the relevant topics to be covered. The auditor sighted the TFI humas resources management system (iLeader) that serves as its repository for all personnel Site Induction records. A sample of reports for individual personnel was provided for review and appeared to demonstrate that relevant training was being provided respective of their activities.	Compliant	

B18	The Applicant shall be responsible for environmental impacts resulting from the actions of all persons that it invites onto the site, including contractors, sub-contractors and visitors.	Operational Environmental Management Plan (OEMP, Version 9.0, February 2023) Letter (dated 11 Dec 2024) - NSW EPA DOC24/901274, RE: EPIC Report EPA-23293 – Alleged Odour Complaint – 26 May 2024 Environment Protection Licence 20918 - Advisory Letter Letter (dated 23 Sept 2024) - RE: EPIC Report EPA- 23100 – Alleged Waste Dumping Complaint – 23 September 2024 Environmental Protection Licence 20918 - Advisory Letter Interview - L Udag Arachchige, A Manning	Environmental Incident Management is adequately addressed in Section 5.15 of the OEMP. An environmental incident was raised by the NSW EPA during the audit period regarding odours from the transport of offal waste to landfill. TFI implemented corrective measures and no further action was deemed necessary by the NSW EPA. As such, it is considered that TFI has adequately addressed the reported environmental impact. A second environmental incident was reported during the current audit period in relation to the handling of waste in a competent manner in potential breach of the Poleo Act 1997. The NSW EPA issued an advisory letter with no further action following corrective and preventative measures undertaken by TFI.	Compliant	
Air Quality and Odour					
Air quality discharges					
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.	OEMP Site Inspection Summary Environmental Monitoring reports and data sets. EPL 20918 Interview - L Udag Arachchige, A Manning	The auditor was advised that there have been no air quality complaints in relation to the site operations during the audit period. An odour complaint was received regarding the transport of offal waste off site, which is not subject to the EPL load limits. The Met Station remains in operation at site. No specific Air Quality monitoring requirements are stipulated in the EPL. At the time of the audit site inspection no odour was evident from the operations beyond the site boundary.	Compliant	
Odour					
C2	The Applicant shall ensure the Development does not cause or permit the emission of any offensive odour (as defined in the POEO Act).	Site inspection Interview - L Udag Arachchige, A Manning OEMP	OEMP - Section 5.2 Effluent System Management, Section 5.2.3 Procedures (Effluent Treatment System Fortnightly Inspection) Section 5.10 Odour Management, Section 5.10.2 Truck washdown, holding yards, effluent treatment system and irrigation area Fortnightly Checklists. The auditor detected a mild odour only during the audit inspection in the immediate vicinity of the stock holding yard and process waste management area. No significant odour was detected from the waste water treatment ponds and irrigation area. No odour complaints were received in relation to site operations during the audit period. Refer B18 regarding off-site transport related odour which was deemed to be adequately addressed.	Compliant	
Dust management					
C3	The Applicant shall carry out all reasonable and feasible measures to minimise dust generated by the Development.	Site inspection Interview - L Udag Arachchige OEMP	Section 5.9 of the OEMP adequately addressed Dust Management No dust complaints had been received or recorded during the audit period. Internal roads at and leading to the rear of the abattoir have a compacted gravel surface. The auditor was advised that these roads are water sprayed during unfavourable conditions to prevent dust generation. Large previously disturbed non-operational areas of the site were observed to be have been successfully stabilised with lawn along with active irrigation to maintain cover.	Compliant	

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; (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.	OEMP Audit Site Inspection Interview - L Udag Arachchige , A Manning	Section 5.12 of the OEMP adequately addresses Traffic Management. On-site traffic levels remain below predicted maximum due to the due to lower than allowable stock production numbers.. Vehicles on-site were observed to be adhering to the posted site speed limit. Livestock processing waste continues to be collected by truck with waste loaded skip style bins with lids to enclose the material for transport off-site. Section 3.1.4 of the OEMP addressed washing down of vehicles. The auditor was advised that washdown occurs at the observed designated washdown area at the rear of the abattoir main building when required with wash down water reporting to the WWTS. Trucks observed entering the site during the audit site inspection were not using engine breaks. It is noted that due to the flat nature of the site, and low site speeds that engine breaking would not be expected to be engaged.	Compliant	
Animal welfare and best practice					
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 contained within the: (a) National Animal Welfare Standards for Livestock Processing Establishments 2nd edition, (Meat and Livestock Australia, 2009) (b) Australian Animal Welfare Standards and Guidelines – Land Transport of Livestock (Animal Health Australia, 2012); (c) Australian Industry Welfare Standards and Guidelines - Goats (Animal Health Australia, 2016); (d) Australian Animal Welfare Standards and Guidelines for Sheep (Animal Health Australia, 2016); (e) Model Code of Practice for the Welfare of Animals: The Goat (CSIRO, 1991); (f) Model Code of Practice for the Welfare of Animals: Livestock at Slaughtering Establishments (CSIRO, 2001); and (g) any other relevant document that supersedes the above.	Certification - AUS-MEAT National Accreditation Standards, 1 September 2025 (AUS-MEAT Limited). AUS-MEAT Detailed Audit report, dated February 2026. Animal Welfare SOP07 (TFI, 25 October 2025) OEMP	AUS-MEAT Limited certify TFI International Bourke Pty Ltd (Est Number: 2985) BOURKE, NSW, AUSTRALIA on 1 September 2025 (expiring 31 August 2026) that it meets the requirements set out in the AUS-MEAT National Accreditation Standards. The scope for which AUS-MEAT Accreditation has been awarded includes the following, in accordance with the establishments' approved quality management system: Boning and Packing of Ovine and Caprine Animals, and Slaughter and Dressing of Ovine and Caprine Animals. AUS-MEAT undertook an evaluation (audit) of the performance against industry standards and meeting the requirements of AUS-MEAT Accreditation in February 2026. The audit confirmed conformity with the relevant standards of r operation. SOP07 addresses requisite Codes and Standards. As previously noted in the IEA, 2020 and 2023, the relevant Standards and Codes are not reference in the OEMP or attached Emergency Disposal and Bio-security Protocol. The auditor does not however consider that this constitutes a non-compliant finding as there is no specific requirement to reference these Standards and Codes in the OEMP or Protocol.	Compliant	
Emergency disposal and biosecurity					
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 Secretary. The protocol shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. The protocol shall: (a) be prepared in consultation with Council, EPA, DPI and other relevant public authorities; (b) be consistent with the relevant AUSTVETPLAN manuals and supporting documents; (c) describe the notification procedures;	OEMP Emergency Disposal and Biosecurity Disposal Protocol (EDBP), Version 4.0, 22 February 2023 Interview - L Udag Arachchige	The EDBP adequately addresses the requirements of this condition. Appendix K Table 1 of the OEMP addresses consultation. Section 1.4.2 of the EDBP Section 2.2.1 of the EDBP	Compliant	

	(d) detail all transport routes to be used in a mass mortality event; (e) detail any requirements to stage the mass disposal of dead livestock; (f) detail the burial location(s) for the disposal of dead livestock, including plans and drawings; (g) detail the measures to maintain quarantine control; (h) detail measures to prevent ground water contamination; and (i) detail the mass mortality disposal procedures and options, consistent with section 2.5.9 of the RTS.		Section 2.2.2 of the EDBP Section 2.2.3 of the EDBP Section 2.2.4 of the EDBP Section 2.2.5 of the EDBP Section 2.2.6 of the EDBP No on-site disposal proposed. Section 2.2.1 of the EDBP		
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. The protocol shall: (a) be prepared in consultation with Council, EPA, DPI and other relevant public authorities; (b) be consistent with the relevant AUSTVETPLAN manuals and supporting documents; (c) describe the notification procedures; (d) detail the measures to maintain quarantine control; and (e) detail measures to prevent ground water contamination.	Emergency Disposal and Biosecurity Disposal Protocol (EDBP), Version 4.0, 22 February 2023 Interview - L Udaghe Arachchige , A Manning	The Protocol was updated in to align with the development approval SSD-7268-Mod-2, including removal of all aspects of on-site disposal. Appendix K Table 1 of the OEMP addresses consultation. The approved EDBP has been aligned with AUSTVETPLAN guidelines. Section 2.1.1 of the EDBP Section 2.2.5 of the EDBP Section 3.2.1 of the EDBP	Compliant	
Disease management					
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 as detailed in Appendix A of this consent; (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; (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 as outlined in Appendix H of the EIS; and (g) details of measures for continuous improvement in disease management to be reported in the annual review required under Condition D7.	OEMP EDMP Emergency Animal Disease Site Action Plan (EADSAP), Version 4.0, 22 February 2023 Q Fever Management Procedure, Version 2.3 (WHS-S3E8-PRC18) TFI Bourke Animal Welfare Standard Operating Procedure (SOP) (V3 3rd May2023) Interview - L Udaghe Arachchige , A Manning Sample of Q-fever immunisation records. Interview - L Udaghe Arachchige Site Inspection Interview - L Udaghe Arachchige Site Inspection TFI Annual Review 2023-2024 TFI Annual Review 2024-2025 Interview - L Udaghe Arachchige , A Manning	The auditor was advised that the site works with suppliers and transporters through the procurement process to ensure the requirement that stock are appropriately prepared for transport, and that this aspect is regularly communicated to suppliers. Animal resting is verified by the driver in the Stock Receipt Receipt and associated questionnaire. TFI should update the most appropriate document (i.e. SOP) to address aspects b) and c) and ensure documentary evidence can be provided that suppliers and drivers have received adequate direction on the requirements for this condition. The Q Fever Management Procedure adequately addresses this requirement. The auditor sighted examples of the Q Fever Vaccination Record completed forms. The audit found that dedicated skip bins with lids continue to be used for trucking waste off-site. This was deemed compliant in the previous IEA, 2020. These aspects have remained consistent for current operations. The Annual Reviews describe current operational measures for the support of disease management, however no specific details are provided for measures for continuous improvement in disease management.	Non-compliant	NC02
Biodiversity					

Biodiversity offset strategy					
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, Appendix I). <i>The ecosystem credit shall be determined in accordance with the Framework for Biodiversity Assessment (OEI 2014) and the NSW Biodiversity Offsets Policy for Major Projects (OEI 2014).</i>	IEA, 2020 and 2023 Bourke Small Stock Abattoir (SSD 7268) - Show Cause, DPIE, 15/02/2021 Response to Show Cause, CAPRA Developments, 9 March 2021 Biodiversity Stewardship agreement (403) Annual Management Report for Year 1 of passive management, Capra Biobank site (2020) BCT Receipts dated 19.11.2021 (x2) Email from BCT dated 13/07/2023 EFT Remittance Advice dated 22 August 2023	This was deemed non-compliant in the previous IEA, 2020 due to the former site owner not meeting the stipulated timeframe for purchasing and retirement of Ecosystem Credits. DPIE (now DPHI) highlighted in letter of 15/02/2021 that the previous IEA, 2020 had identified that the former development owner CAPRA Development Pty Ltd (CAPRA) had failed to purchase and retire the offset credits. CAPRA responded requesting a stay of proceedings due financial hardship, stating it would commit to making the outstanding payment upon entering a binding agreement for sale of the BSSA. Some BCT receipts were able to be provided for two payments of \$89,611.34. BCT confirmed via email that of the 80% TFD required to reach active management: \$268,342.20 that the amount paid up to 13 July 2023 was \$266,964.09 (79.6%) leaving \$1,379.12 outstanding. The auditor was advised that TFI are working to finalise this payment. At the time of reporting for the 2023 audit TFI had completed the final payment to BCT.	Not triggered	
C9	Any proposed management activities shall be in addition to other obligations for conservation that are attached to the land such as actions being carried out under a Property Vegetation Plan. <i>Note: If the Applicant seeks a variation to the offset rules, the Applicant shall demonstrate that reasonable steps have been taken to find like-for-like offsets in accordance with Section 10.5.4.2 of the FBA and Appendix A of the OEI's NSW Biodiversity Offsets Policy for Major Projects 2014.</i>	IEA, 2020 and 2023 Letter - Biodiversity Conservation Trust (BCT) - 2024 Annual Report (Ref: DOC25147138, dated 14th February 2025 Recipient Created Tax Invoices (BA00403 AMP3) and AMP00403 AMP3-1), BIODIVERSITY STEWARDSHIP PAYMENTS FUND, dated 12/03/2026	A property vegetation plan (PVP) approved under the provisions of the NV Act applies to the broader property containing the project site.	Compliant	
Traffic and Transport					
Road works and site access					
C10	Prior to the commencement of operation of the Development, the Applicant shall complete the private vehicular road access road connection to the Mitchell Highway to the satisfaction of the roads authority. The Applicant shall obtain approval for the works under Section 138 of the Roads Act 1993.	IEA, 2020 and 2023 Site inspection	Deemed to be compliant in the previous IEA, 2020. No changes since previous 2023 audit.	Compliant	
C11	Prior to the commencement of operation of the Development, the private vehicular access road connection to the Mitchell Highway is to be constructed to the satisfaction of the RMS and is to include the following: (a) a Basic Right-Turn Treatment (BAR) as shown in Figure 7.5 Part 4A of the Austroads Guide to Road Design on the Mitchell Highway at its intersection with the vehicular access servicing the site; (b) a Rural Auxiliary Left Turn Treatment - Short Turn Lane [AUL(S)] on the Mitchell Highway generally in accordance with Figure 8.3 Part 4A of the Austroads Guide to Road Design and relevant RMS Supplements; (c) the private vehicle access road at the approaching connection to the Mitchell Highway is to be wide enough to accommodate the simultaneous passing of turning road train vehicles. The access road is to be sealed a minimum of 60 m from the edge of the hold line; and (d) Safe Intersection Site Distance (SISD) requirements outlined in the Austroads Guide to Road Design Part 4A and relevant RMS Supplements shall be provided and maintained at the site access to the Mitchell Highway.	IEA, 2020 and 2023 Site inspection Interview - L Udage Arachchige	Deemed to be compliant in the previous IEA, 2020 Site access unchanged since previous 2023 audit.	Compliant	
Signage					

C12	Size C Gateway Truck (crossing or entering) Signs (W5-22) with 300 metre distance plates are to be provided 300 metres either side of the site access. The signs are to be erected and visible during construction and operation of the Development.	IEA, 2020 and 2023 Site inspection Interview - L Udage Arachchige	Deemed to be compliant in the previous IEA, 2020 Requisite signage was sighted by the auditor during the recent 2026 audit inspection.	Compliant	
C13	Prior to the commencement of construction works on the Mitchell Highway, a Works Authorisation Deed (WAD) shall be executed between the Applicant and the RMS to enable the Applicant to undertake "private financing and construction" works on the Mitchell Highway. <i>Note: 'Commencement of construction' includes both the vehicular access and water pipeline works</i>	IEA, 2020 and 2023 Interview L Udage Arachchige Site inspection	Deemed to be compliant in the previous IEA, 2020	Compliant	
Road Occupancy Licence					
C14	Prior to the commencement of construction works on the Mitchell Highway, the Applicant shall contact the RMS Traffic Operations Coordinator to determine if a Road Occupancy Licence (ROL) is required. In the event a ROL is required, the Applicant shall obtain the ROL prior to works commencing within three metres of the travel lanes in the Mitchell Highway. <i>Note: 'Commencement of construction' includes both the vehicular access and water pipeline works</i>	IEA, 2020 and 2023	Deemed to be compliant in the previous IEA, 2020	Compliant	
Construction Traffic Management Plan					
C15	Prior to the commencement of construction, the Applicant shall prepare a Construction Traffic Management Plan for the Development. The plan shall form part of the CEMP required under Condition D1 and shall: (a) be prepared by a suitably qualified and experienced person/s in consultation with Council and the RMS; (b) detail the management measures that would be implemented to ensure road safety, network efficiency and access during construction; (c) contain a drivers code of conduct to: (i) minimise the impacts of construction on the local and regional road network; and (ii) minimise conflicts with other road users; (d) detail heavy vehicle numbers, routes, site access and parking arrangements; and (e) if necessary, detail procedures for notifying any nearby residents of any potential disruptions to routes.	IEA, 2020 and 2023	Deemed to be compliant in the previous IEA, 2020	Compliant	
Operating conditions					
C16	The Applicant shall ensure: (a) internal roads, driveways and parking (including grades, turn paths, sight distance requirements, aisle widths, aisle lengths and parking bay dimensions) associated with the Development are 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 manoeuvrability through the site, is in accordance with AUSTROADS Guide to Road Design; (c) the Development does not result in any vehicles queuing on the public road network; (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.	IEA, 2020 and 2023 Interview L Udage Arachchige Site inspection Letter - Carpenter, Collins & Craig (CC&C), Proposed Small Stock Abattoir Bourke Internal Road & Carpark Design, 5 March 2020	Internal roads were deemed by CC&C to comply with the AUSTROADS Guide to Road Design and relevant standards. As above No vehicles were observed queuing on the public road network and would not be expected to be necessary. As above Vehicles have ample room on-site upon entry before being required to stop. All loading and unloading is able to, and was observed to be on site during the recent 2026 audit inspection. The carpark area was observed to be ordered with adequate turning areas. The staff and visitor car park is segregated from the operations area of the site, including nominated pathways and trafficable areas for delivery vehicles and trucks.	Compliant	
Waste					

Waste management					
C17	The Applicant shall ensure any liquid and non-liquid wastes generated on the site is classified in accordance with the <i>Waste Classification Guidelines Part 1: Classifying Waste</i> , (EPA, 2014), or its latest revision.	IEA, 2020 and 2023 Updated Waste Management Plan (WasMP), (version 5, Feb, 2023) Updated Wastewater Management Plan (WWMP, version 4.0, Feb, 2023) L Udag Arachchige , A Manning	Addressed in Section 2.1 of the WasMP with waste stream classification and disposal locations identified in Table 1. Wastewater streams and classification are identified in Table 2.1 of the updated WWMP. All wastewater is captured for on-site treatment and irrigation in accordance with the WWMP. All non-liquid waste is managed in accordance with the WasMP.	Compliant	
C18	Prior to the commencement of operation, the Applicant shall provide the Secretary and the EPA with documentary evidence, including a copy of any executed Waste Agreement(s), confirming it has secured a suitably licensed waste collection facility capable of lawfully receiving the relevant waste from the site with consideration to the POEO Act, <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the relevant development consents of receiver facilities.	IEA, 2020 and 2023 Table K.1 and Table K-2 of OEMP (v8) lists consultation details Examples of waste collection and disposal invoices - L&L Bunyan Pty Ltd trading as Bourke Waste Management NSW EPA - Resource Recovery Exemption under Part 9, Clauses 91 and 92 of the Protection of the Environment Operations (Waste) Regulation 2014 - The manure exemption 2014. L Udag Arachchige , A Manning	General waste, including paunch is collected from site via Bourke Shire Council's waste contractor for disposal at the Council landfill. Council does not require a Waste Agreement for this service. TFI advised it is currently assessing the potential and feasibility of creating of an on-site composting facility for this and other waste streams. If deemed to be feasible this will require further assessment and approval (ie. modification to the current approval). All livestock processing waste is taken off-site to the TFI facility to its Walgett facility for rendering. Manure from the dry swept yards and truck wash is temporarily stored on-site in a concrete storage bay prior to land application on surrounding owned lands under the EPA Resource Recovery Exemption. General waste appeared to be managed appropriately, and other waste is beneficially reused rather than disposed. At the time of the audit inspection a metals recycling contractor was removing large amount of material from the rear of the site.	Compliant	
C19	All waste removed from the site shall only be directed to a waste management facility or premises lawfully permitted to accept the waste.	As above TFI Standard Operating Procedures (SOP) - Maintenance, Chemical, Animal Welfare Waste Disposal Invoices (sample of 20 sighted for various waste stream)	General waste, including paunch is collected from site via Bourke Shire Council's waste contractor for disposal at the Council landfill. Livestock processing waste is taken off-site to the TFI facility in Walgett for rendering. MOD 5 granted approval for the Skin Shed which was in the early stage of construction during the site inspection. Wastewater is considered separately below.	Compliant	
C19A	All liquid waste from the operation of the Skin Shed must be removed by a licensed waste contractor for disposal at an appropriately licensed facility.	Site inspection	The skin shed was under construction and not yet operational at the time of the current audit.	Not triggered	
Waste Management Plan					

C20	Prior to the commencement of operation, the Applicant shall prepare a Waste Management Plan (WMP) for the Development to the satisfaction of the Secretary. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. The WMP shall: (a) be prepared in consultation with the EPA; (b) detail the type and quantity of waste to be generated during construction and operation of the Development; (c) describe the handling, storage and disposal of all waste streams generated on site, consistent with the POEO Act, <i>Protection of the Environment Operations (Waste) Regulation 2014</i> and the EPA's <i>Waste Classification Guideline</i> ; (d) detail the materials to be reused or recycled, either on or off site; and (e) include the Management and Mitigation Measures included in Appendix A.	IEA, 2020 Waste Management Plan (WasMP, version 5, Feb, 2023)	The updated TFI WasMP adequately addresses the requirements of this condition. Table K1 and Table K-2 of OEMP (v8) lists consultation details Section 2.1 of subplan. Sections 2.4 and 2.5 of WasMP Section 2.5 of WasMP Sections 2.1, 2.2, 2.3, 2.4 and 2.5 of WasMP	Compliant	
	Prior to the commencement of operation of the skin shed on the site, the Applicant must update the approved Waste Management Plan (WMP) to include details on the handling, underground storage and disposal of the liquid. The Applicant must not commence operation of the skin shed until the updated Waste Management Plan has been approved by the Planning Secretary.	Interview: L Udage Arachchige , A Manning As above	The skin shed was under construction and not yet operational at the time of the current audit. The auditor was advised that the approved WasMP will be updated to include this operational activity. As above	Not triggered Not triggered	
C21	Waste generated 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 licence under the POEO Act, if such a licence is required in relation to that waste.	Section 2.2 of the WasMP Interview - L Udage Arachchige Site inspection	Section 2.2 of the WasMP addresses this requirement. The auditor was advised that no outside waste is received at the site. No outside generated waste was identified on site during the audit inspection with the exception of general packaging materials and spent chemical containers as required for operation.	Compliant	
Hazard and Risk					
Dangerous goods					
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) the Environment Protection Manual for Authorised Officers: Bunding and Spill Management, technical bulletin (Environment Protection Authority, 1997).	Interview - L Udage Arachchige, A Manning Site inspection TFI Bourke Chemical SOP V1/2023, 9 February 2023 PIRMP OEMP	The following observations were made on site during the 2026 audit inspection: - Chemicals stored in the main abattoir storage room included Class 3 (flammable) and Class 8 (corrosive) chemicals without appropriate segregation. Chemical placarding on the storage room doors did not reflect the chemical stored in the room. SDS were not present in the SDS folder. - The large external pump shed contained two Flammable 3 cabinets and a small Flammable 2 aerated cabinet. Segregation of Class 3 (flammable) and Class 2 (flammable gas), along with other chemical stored on palette bunds needs to be addressed as was not considered by the auditor to be compliant with the relevant Australian Standards. Other combustible materials (ie. cardboard boxes, rags) should also be kept clear of these storages. SDS in the SDDS Folders did not reflect all chemicals in the storage room or storage shed. - A lithium iron battery powered compressor (potential ignition source) was observed to be left sitting next to a Class 2 aerated cabinet containing LPG gas cylinders.	Non-compliant	NC03
	(b) for the refrigeration system, Refrigerating systems and heat pumps - Safety and environmental requirements AS/NZS 5149; and (c) for liquids, the NSW Environmental Protection Agency (EPA) Storing and Handling of Liquids: Environmental Protection – Participants Manual.	Noted	Noted		
	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.	Noted	Noted		
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 Hazardous and Offensive Development Application Guidelines – Applying SEPP 33 (Applying SEPP 33) at all times.	Interview L Udage Arachchige , A Manning Site inspection	General chemicals and dangerous goods storage at site is at relatively low volumes. Ammonia storage is kept below the threshold of 5 tonnes.	Compliant	

C23A	The quantity of Ammonia (Anhydrous) (UN 1073) used in refrigeration systems (vessels, pipework and associated refrigeration equipment) must:	Interview - L Udage Arachchige , A Manning	Storage levels are reported to no exceed 26,000 kilograms at any one time.	Compliant	
	(a) not exceed 26,000 kilograms at any one time; and	Monthly Service Reports (sample)	Refrigeration equipment is routinely assessed and serviced.		
	(b) must be handled in accordance with AS/NZS 5149.				
Pre-constctction					
C23B	At least one month prior to the commencement of construction of SSD-7268-Mod-3 (except for construction of those preliminary works that are outside the scope of the hazard studies), or within such further period as the Planning Secretary may agree, the Applicant must prepare and submit for the approval of the Planning Secretary a Fire Safety Study for the entirety of the development. Pre-Commissioning This study must cover the relevant aspects of the Department's Hazardous Industry Planning Advisory Paper No. 2, 'Fire Safety Study Guidelines' and the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems (NSW HMPCC, 1994). The study must also be submitted to Fire and Rescue NSW and meet the requirements of Fire and Rescue NSW. Note: To satisfy the requirements of Fire & Rescue NSW' above, the Applicant should provide confirmation in writing from Fire & Rescue NSW' that the Study meets the requirements of Fire & Rescue NSW as required by the Department's Hazardous Industry Planning Advisory Paper No. 2 'Fire Safety Study' guideline.	Construction Certificate No. CC 2017//0010/3	CC's indicate completion of Fire Safety Studies. No audit evidence was provided to demonstrate that the FSS were provided to the Secretary, or within the stipulated timeframe.	Non-compliant	NC04
		Interim Occupation Certificate No. IOC 2017/001/02			
		Construction Certificate No. CC 2017/0010/2/2			
Pre-commissioning					
C23C	No later than two months prior to the commencement of commissioning of SSD-7268-Mod-3, or within such further period as the Planning Secretary may agree, the Applicant must submit to the Planning Secretary a comprehensive Emergency Plan and detailed emergency procedures for the development. The Emergency Plan must include consideration of the safety of all people outside of the development who may be at risk from the development. The plan must be prepared in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 1, 'Emergency Planning'.	2026 Draft Emergency Plan for Bourke Facility, dated April 2026	No evidence of provision to the Secretary within two months prior to the commencement of MOD3.	Non-compliant	NC05
			The EMP was developed in consultation with neighbouring facilities and other occupants/co-tenants.		
Pre-commissioning					
23D	Within twelve months of the commencement of SSD-7268-Mod-3 and every five years thereafter, or at such intervals as the Planning Secretary may agree, the Applicant must carry out a comprehensive Hazard Audit of the development. The audits must:	Interview: L Udage Arachchige , A Manning	No comprehensive Hazard Audit/s of the development sighted by the auditor.	Non-compliant	NC06
	(a) be carried out at the Applicant's expense by a qualified person or team, who have been approved by the Planning Secretary and are independent of the development;				
	(b) be carried out in accordance with the Department's Hazardous Industry Planning Advisory Paper No. 5, 'Hazard Audit Guidelines'; and				
	(c) include a review of the site Safety Management System and a review of all entries made in the incident register since the previous audit.				
23E	Within one month of completing each audit carried out in accordance with condition 23D, the Applicant must submit a report to the satisfaction of the Planning Secretary for approval. 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.		As above, no provision of audit to the Planning Secretary.	Non-compliant	NC07
Noise					
Hours of work					

C24	The Applicant shall comply with the hours detailed in Table 1, unless otherwise agreed in writing by the Secretary. <table><tr><td colspan="3">Table 1: Hours of Work</td></tr><tr><td>Activity</td><td>Day</td><td>Time</td></tr><tr><td rowspan="3">Earthworks and construction</td><td>Monday – Friday</td><td>7:00am to 6:00pm</td></tr><tr><td>Saturday</td><td>8:00am to 1:00pm</td></tr><tr><td>Sunday</td><td>Nil</td></tr><tr><td>Operation</td><td>Monday – Sunday</td><td>24 hours</td></tr></table>	Table 1: Hours of Work			Activity	Day	Time	Earthworks and construction	Monday – Friday	7:00am to 6:00pm	Saturday	8:00am to 1:00pm	Sunday	Nil	Operation	Monday – Sunday	24 hours	OEMP Interview - L Udag Arachchige	At the time of the audit inspection the site was operating over shifts for 24 hours operation. The current MOD 5 construction works are only conducted between the stipulated times for earthworks and construction.	Compliant	
Table 1: Hours of Work																					
Activity	Day	Time																			
Earthworks and construction	Monday – Friday	7:00am to 6:00pm																			
	Saturday	8:00am to 1:00pm																			
	Sunday	Nil																			
Operation	Monday – Sunday	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 Secretary; (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.	IEA, 2020 and 2023 Interview - L Udag Arachchige	Not applicable to the current operations. The MOD 5 construction activities have not required out of hours works.	Compliant																	
Construction noise limits																					
C26	The Development shall be constructed with the aim of achieving the construction noise management levels detailed in the <i>Interim Construction Noise Guideline</i> (Department of Environment and Climate Change, 2009). All feasible and reasonable noise mitigation measures shall be implemented and any activities that could exceed the construction noise management levels shall be identified and managed in accordance with the CEMP.	Interview - L Udag Arachchige , A Manning Site inspection	MOD 5 construction activities are not expected to exceed noise management levels.	Compliant																	
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.	Interview - L Udag Arachchige , A Manning Site inspection	MOD 5 construction activities are not expected to exceed noise management levels.	Compliant																	
Operational noise limits																					
C28	The Applicant shall ensure that noise generated by the operation of the Development does not exceed the noise limits in Table 2. <table><tr><td colspan="5">Table 2: Noise Limits (dB(A))</td></tr><tr><td>Location</td><td>Day L_{day}(15 minute)</td><td>Evening L_{evening}(15 minute)</td><td>Night L_{night}(15 minute)</td><td>Night L_{night}(15 minute)</td></tr><tr><td>All residential receivers</td><td>35</td><td>35</td><td>35</td><td>45</td></tr></table> <i>Note: Noise generated by the Development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. Refer to the plan in Appendix D for the location of residential receivers.</i>	Table 2: Noise Limits (dB(A))					Location	Day L _{day} (15 minute)	Evening L _{evening} (15 minute)	Night L _{night} (15 minute)	Night L _{night} (15 minute)	All residential receivers	35	35	35	45	Interview - L Udag Arachchige	The auditor was advised that no noise complaints had been received during the current audit period. As such, in accordance with the OEMP the need for noise monitoring has not been triggered.	Compliant		
Table 2: Noise Limits (dB(A))																					
Location	Day L _{day} (15 minute)	Evening L _{evening} (15 minute)	Night L _{night} (15 minute)	Night L _{night} (15 minute)																	
All residential receivers	35	35	35	45																	
Soil and Water																					
Construction soil and water management																					
C29	Soil and water management measures consistent with Managing Urban Stormwater - Soils and Construction Vol. 1 (Landform, 2004) (the Blue Book) shall be employed during the construction of the Development to minimise soil erosion and the discharge of sediment and other pollutants to land and/or waters.	Site inspection	The current MOD 5 construction activity (earthworks) was observed to be adequately managed to avoid erosion and sediment discharge.	Compliant																	
Surface water discharge limits																					

C30		Interview - L Udage Arachchige , A Manning Section 3.2.1 of the WatMP	No surface water discharges from the sediment dam were reported during the audit period and since the recommencement of operations. At the time of the audit site inspection works were underway to improve the sediment dam and spillway. Irrigation of effluent via the pivot irrigator is actively undertaken. No ponding or runoff was observed.	Compliant	
Stormwater					
C31	Condition removed by MOD 2		Condition removed by MOD 2	Not triggered	
Bunding					
C32	The irrigation area, four process wastewater treatment ponds, mass-burial area and the manure stockpiling area shall be banded to prevent clean stormwater run-off from entering these areas.	Site inspection Interview - L Udage Arachchige , A Manning Irrigation Survey 2.pdf Proposed Pivot Irrigation 2.pdf	The wastewater treatment ponds are adequately banded to prevent clean water runoff entering ponds. During the current audit period the primary irrigation area has been developed for pivot irrigation. Diversion bunds and drainage has been established to divert clean water from the active irrigation area. There was no evidence of pooling of irrigated effluent on the irrigation area. The mass-burial area is not in use, and is not proposed to be used in future. The manure stockpile is not in use and was removed by MOD 2. Manure from the dry swept yards and truck wash is temporarily stored on-site in a concrete storage bay prior to land application on surrounding owned lands (usually same day) under the EPA Resource Recovery Exemption	Compliant	
Groundwater					
C33	The groundwater bores for the Development shall be constructed in accordance with the Minimum Construction Requirements for Water Bores in Australia, Third Edition, February 2012, (National Uniform Drillers Licensing Committee, 2012) to a minimum depth of 20 metres below ground level.	IEA, 2020 and 2023 Site inspection	Deemed compliant in the previous audits. The sign posted groundwater bore locations were observed during the 2026 audit site inspection.	Compliant	
Wastewater					
Irrigation area					
C34	The Applicant shall ensure the quantity and quality of wastewater applied to the irrigation area shall not exceed the capacity of that area to effectively utilise the 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.	Site inspection Interview - L Udage Arachchige WWTP Commissioning Plan (Excel Spreadsheet)	At the time of the current audit, waste water irrigation was via the centre pivot irrigator over the defined dedicated area. No cropping has been undertaken to date in the irrigation area. In discussion, it was noted that the proposed composting facility represent an opportunity to manage harvested crops for the irrigation area in future.	Compliant	
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 x 10-9 ms or less and a thickness of no less than 900mm, or an equivalent alternative.	Site Inspection Section 2.3.2 of the WWMP IEA, 2020 and 2023	The wastewater treatment ponds are lined as confirmed by the previous IEA, and appeared in good order, and were in operation at the time of the 2026 audit inspection Section 2.3.2 of the WWMP indicates that ponds are lined with EPDM synthetic rubber with a permeability of 2.233x10-11 m/s.	Compliant	
Design					
	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 Secretary. The WWMP shall: (a) be developed in consultation with the EPA; (b) include a summary of the management of wastewater streams on-site, as detailed in the EIS and RTS; (c) detail the controls to minimise manure being flushed from stockyards to effluent treatment systems; (d) include final details on pond specifications such as liners and leak detection systems;	IEA, 2020 and 2023 WWMP (version 4.0, Feb 2023)	Deemed compliant in the previous IEA, 2020 The updated WWMP adequately addresses the requirements of this condition. Table K1 and Table K-2 of OEMP (v8) lists consultation details Section 2.1 of the WWMP Section 2.2 of the WWMP Section 2.3.2 of the WWMP	Compliant	

C35	(e) detail the retention periods for each pond and measures to prevent sludge build up; (f) provide evidence that wet weather effluent storage capacity is adequate to prevent effluent discharge in 90 percent of years based on water balance modelling, for high strength effluent, as detailed in the <i>Environmental Guidelines – Use of Effluent by Irrigation</i> (EPA, 2004); (g) ensure the wastewater treatment system is maintained to avoid odour generation including ensuring crust formation on the anaerobic ponds and controlling irrigation droplet size; and (h) include details on bunding around ponds and the fate of first-flush stormwater collected inside the bund area and in sediment basins after a rainfall event.		Section 5.2.3 of OEMP, Table 2.3 and Section 2.3.3 of the WWMP Section 2.4 of the WWMP WWMP includes a cross-reference "Management actions to manage odour generation from the wastewater system are described in OEMP Section 5.10" Section 2.7.2 "The tailwater pond is a first flush system and once full excess water bypasses. Water collected in the tailwater pond is pumped to the irrigation system and irrigated. Modelling indicates it can take up to 3 days to empty the water collected in the settling zone (590 m3) following rainfall. This is consistent with the design criteria of restoring the design capacity within 5 days of rainfall."		
Monitoring					
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 quality.	Effluent System Commissioning Plan (version 3.0, Feb 2023) WWTP Commissioning Plan (Excel Spreadsheet) Site inspection Interview - L Udage Arachchige , A Manning	Since the previous audit the irrigation area was surveyed and developed to include diversion drainage and bunding. The circular area areas is irrigated via a pivot system. Ongoing monitoring in accordance with the EPL has been undertaken during the audit period.	Compliant	
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 to detect when specific water quality, soil or crop sustainability trigger values are nearing or have exceeded, trigger values.	OEMP Effluent System Commissioning Plan (version 3.0, Feb 2023) Irrigation Management Plan Proposed Pivot Irrigation 2.pdf (Design) TFI Bourke - ENVIRONMENTAL MONITORING, SEPTEMBER 2025, November 2024 and April 2024 (Premise) Site inspection Interview - L Udage Arachchige - A Manning	TFI undertake routine soil and water monitoring with results reported in summary reports and via the EPL Annual Returns. No crops have been incorporated in the irrigation area at this stage.	Compliant	
Irrigation management					
C38	Prior to the commencement of operation, the Applicant shall update the Irrigation Management Plan (IMP) (referred to Appendix K of the EIS) to the satisfaction of the Secretary. The IMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. The IMP shall be prepared in consultation with the EPA and shall include: (a) a detailed soil report prepared by a suitably qualified expert for the range of site limitations including salinity, sodicity, low permeability and low phosphorus sorption capacity; (b) identification of baseline soil monitoring sites to allow comparison between impacted and non-impacted sites; (c) management and mitigation measures available for any potential site limitations for irrigation; and	IEA, 2020 and 2023 IMP (version 5, Feb 2023)	Table K1 and Table K-2 of OEMP (v8) lists consultation details Section 2.8 to section 2.10 of the IMP, Table 3.1 – "Management of site limitations" of subplan Section 2.4 and Appendix G1 of subplan Table 3.1 – "Management of site limitations" of subplan	Compliant	

	(d) clearly defined management actions that are to be implemented when approaching or exceeding agreed sustainability trigger values. <i>Note: Potential sustainability trigger values can be found in Resource Manual of Development of Indicators of Sustainability for Effluent Reuse in the Intensive Livestock Industries: Piggeries and Cattle Feedlots. Project No. 1816, Australian Pork Limited, May 2003.</i>		Table 3.2 – Management actions for key sustainability triggers of subplan	
Surface Water and Groundwater				
Water Management Plan				
C39	Prior to the commencement of operation, the Applicant shall prepare a Water Management Plan (WMP) to the satisfaction of the Secretary. The WMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5. The WMP shall: (a) be prepared in consultation with the DPI, Council and the EPA; (b) detail water use, metering, disposal and management on-site; (c) detail the number and location of piezometers on-site; (d) include contingency measures in the event of inadequate water supply being available to meet all water demands; (e) contain a Surface Water Management Plan, including: (i) a program to manage and monitor: • surface water flows and quality; • surface water storage and use; and • stormwater retention pond; (ii) sediment and erosion control plans; (f) contain a Groundwater Management Plan, including: (i) a minimum of nine months baseline data on groundwater levels and quality; (ii) a program to monitor groundwater levels and quality including details on: • the number, design and location for the monitoring bores; • timelines for establishment and sampling regime(s) for the monitoring bores; • monitoring frequency and suites of analytes to be monitored; • reporting requirements for the sampling results; (iii) verify the Development meets the minimal impact considerations in the NSW Aquifer Interference Policy; (iv) groundwater impact assessment criteria, including how trigger levels for investigating any potentially adverse groundwater impacts will be established; and (v) a protocol for the investigation and mitigation of identified exceedances of the groundwater impact assessment criteria.	IEA, 2020 and 2023 OEMP WMP (version 5, Feb 2023)	Deemed compliant in the previous IEA, 2020. The WMP was updated to include the approved changes from MOD 2. Table K1 and Table K-2 of OEMP (v8) lists consultation details Section 2.2 and Section 5.6.3 of the WMP Section 4.3 of the WMP Sections 2.3 and 2.4 of the WMP Section 3..2.1 of the WMP Section 3.4 of the WMP Section 4.2 of the WMP Section 4.3 of the WMP Section 4.4.5 of the WMP Section 4.4.2 of the WMP Section 4.4.3 of the WMP	Compliant
Visual Amenity				
External lighting				
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.	IEA, 2020 and 2023	Deemed compliant in previous IEA, 2020. There have been no external lighting changes during the reporting period. There have been no complaints recorded regarding lighting.	Compliant
Heritage				
Aboriginal site cards				
C41	Prior to the commencement of construction, the Applicant shall prepare Aboriginal site cards to be registered with the OEH for all Aboriginal sites discovered during the site surveys.	IEA, 2020 and 2023	Deemed compliant in the previous IEA, 2020	Compliant
Protection of Aboriginal Heritage Items				

C42	Prior to the commencement of construction and prior to any ground works within the irrigation area, the Applicant shall undertake Aboriginal heritage pre-clearance surveys within the irrigation area in accordance with the survey methodology outlined in the EIS.	IEA, 2020 and 2023	Deemed compliant in the previous IEA, 2020	Compliant	
Unexpected Finds Protocol					
C43	If any archaeological relics are uncovered during the course of construction of the Development, then all works shall stop immediately in that area and the OEH Heritage Branch contacted. <i>Note: Depending on the possible significance of the relics, an archaeological assessment and an excavation permit under the NSW Heritage Act 1977 may be required before further work can continue in that area.</i>	IEA, 2020 and 2023 IMP (version 5, Feb 2023) Interview: L Udage Arachchige	No unexpected finds reported during the previous and current MOD5 construction phase.	Not triggered	
C44	If any Aboriginal objects are uncovered during work, excavation or disturbance of the work area, work must stop immediately and the Regional Operations Group of the OEH, Council and the RAPs are to be consulted.	IEA, 2020 and 2023	As above	Not triggered	
Aboriginal Cultural Heritage Management Plan					
C45	Prior to the commencement of operation, the Applicant shall prepare an Aboriginal Cultural Heritage Management Plan (ACHMP) to the satisfaction of the Secretary. The ACHMP shall form part of the OEMP in Condition D3 and be prepared in accordance with Condition D5 and shall: (a) be prepared in consultation with the OEH and Registered Aboriginal Parties (RAPs) identified in the EIS; (b) include a clear long-term management plan for artefacts collected from the site; (c) determine whether a Care Agreement is required; (d) describe the management actions for the surveyed Aboriginal sites during construction and operation; (e) incorporate any additional sites found during the survey of the irrigation area; and (f) describe the management actions for the remnant Gurri tree/s located on the site and the replacement Gurri trees required by Condition C46 of this development consent.	IEA, 2020 and 2023 ACHMP, Version 4, 2016.	ACHMP, Version 4 reviewed and approved by DPE in 2016. This version of the ACHMP was still current ACHMP at the time of the audit. Deemed compliant by the previous IEA, 2020.	Compliant	
Gurri tree removal and compensatory planting					
C46	Prior to the commencement of operation, the Applicant shall compensate for the removal of one Gurri tree through: (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 locations 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. Documentation of consultation with the RAPs including the final location(s) of the trees shall be included in the ACHMP required by Condition C45 and provided to the Secretary prior to the commencement of operation. <i>Note: The Applicant is not responsible for the trees after the actions required by this condition have been completed.</i>	IEA, 2020 ACHMP Interview - L Udage Arachchige Letter - Murrawarri Provisional Council of State, dated 1/07/2026	The previous IEA, 2020 deemed non-compliant based on the lack of evidence provided by the previous development owner that the Gurri trees had been purchased or planted in accordance with the ACHMP. The auditor was advised that the Gurri tree saplings referred to in the IEA, 2020 have been traced by TFI to the previous owner of "Gidgee House", which has since moved to Mudgee, NSW. TFI have made efforts, unsuccessfully, to regain these saplings. Alternatively, TFI had previously advised they may aim to acquire new saplings for planting. The auditor was advised that despite various efforts to source Gurri trees, including sourcing samplings, new tube stock and attempts to propagate, it has not been possible to do so. TFI has maintained positive ongoing consultation with the Murrawarri Provisional Council of State including the relocation of the "Bumble" tree. The auditor has deemed this condition to no longer be triggered due to pre-commencement required now being long surpassed, along with the inability to realistically comply with this condition.	Not triggered	
Schedule D - Environmental Management and Reporting					
Environmental Management					
Construction Environmental Management Plan					
	The Applicant shall prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary. The CEMP shall: (a) be prepared by a suitably qualified and experienced person in consultation with Council;	IEA, 2020	Deemed to be compliant in the previous IEA, 2020	Compliant	

D1	(b) be approved by the Secretary prior to the commencement of construction; (c) outline all environmental management practices and procedures to be followed during earthworks and construction, including: (i) dust management; (ii) traffic management as required by Condition C15; (iii) noise management; (iv) construction soil and water management as required by Condition C29; and (v) community consultation and complaints handling; (d) describe all activities to be undertaken on the site during earthworks and construction, including a clear indication of construction stages; (e) detail how the environmental performance of the construction works will be monitored, and what actions will be taken to address identified adverse environmental impacts; and (f) describe of the roles and responsibilities of all relevant employees involved in earthworks and construction.				
D2	The Applicant shall carry out the construction of the Development in accordance with the CEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	IEA, 2020	As above	Compliant	
Operational Environmental Management Plan					
D3	The Applicant shall prepare an Operational Environmental Management Plan (OEMP) for the Development to the satisfaction of the Secretary. The OEMP shall: (a) be submitted to the Secretary for approval prior to the commencement of operation; (b) be consistent with the relevant best practice guidelines and standards including those described in Conditions B6(d) and C5; (c) be prepared by a suitably qualified and experienced expert; (d) provide the strategic framework for environmental management of the Development; (e) identify the statutory approvals that apply to the Development; (f) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the Development; (g) describe the procedures that would be implemented to: (i) keep the local community and relevant agencies informed about the operation and environmental performance of the Development; (ii) receive, handle, respond to, and record complaints; (iii) resolve any disputes that may arise; (iv) respond to any non-compliance; (v) respond to emergencies; and	IEA, 2020 and 2023 OEMP (version 9.0, Feb 2023) DPE letter: Approval of the Operation Environmental Management Plan (V09) (SSD-7268-PA-6), 4 April 2023 Interview - L Udage Arachchige	Deemed to be compliant by the previous IEA, 2020. The OEMP (version 9, Feb, 2023) was updated to include the changes in the approved MOD 2. The OEMP was approved by the DPHI. refer findings to B6(d) and C5 Martin Haegge Geolyse Pty Ltd Section 2 "Strategic Framework for Environmental Management" Section 1.4.1 "Approvals"; and Section 1.4.6 "Other Statutory Obligations" Section 2.3 "Management Roles and Responsibilities" Section 7.1 Annual Return and Section 7.2 Annual Review, "The Annual Review (AR) will be a summary of the environmental performance of the Bourke Small Stock Abattoir for the reporting period." Section 7.2.5 "The AR will be disseminated to the following agencies: a) Environment Protection Authority; and b) Bourke Shire Council A copy of the AR will be made publicly available on the company website" Section 5.14 Complaints Management - 5.14.2 "Procedure" Section 5.14.2 "complaints management procedure" - dispute resolution subpoint 7) Table 7-1 Non-compliance response Section 5.15	Compliant	

	(h) include the following environmental management plans: (i) Emergency Disposal and Bio-security Protocol as required by Condition C6; (ii) Waste as required by Condition C20; (iii) Wastewater as required by Condition C35; (iv) Irrigation as required by Condition C38; (v) Water as required by Condition C39; and (vi) Aboriginal Cultural Heritage as required by Condition C45.		Appendix D Appendix E Appendix F Appendix G Appendix H Appendix J		
D4	The Applicant shall operate the Development in accordance with the OEMP approved by the Secretary (and as revised and approved by the Secretary from time to time), unless otherwise agreed by the Secretary.	Interviews - L Udage Arachchige , A Manning Site Inspection Sample of Form 1 - Environmental Checklist (completed)	The auditor sighted a sample of completed Environmental Checklists and was adequately explained the key Environmental Management aspects of the operation. Some non-compliant findings and opportunities for improvement have been made by the audit in relation current operations. However the auditor found the development was operating in general accordance with the OEMP and associate sub-plans.	Compliant	
Management Plan Requirements					
D5	The Applicant shall ensure that the environmental management plans required under Condition D3 of this consent are prepared by a suitably qualified person or persons in accordance with best practice and include: (a) detailed baseline data; (b) a description of: (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures/criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the Development or any management measures; (c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: (i) impacts and environmental performance of the Development; (ii) effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the Development over time; (g) a protocol for managing and reporting any: (i) incidents; (ii) complaints; (iii) non-compliances with statutory requirements; and (iv) exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan.		Martin Haegle Geolyse Pty Ltd. Baseline data presented for waste, waste-water, irrigation and water (groundwater) Section 1.4 "Licenses and Approvals"; and Section 1.4.6 "Other Statutory Obligations" Section 2 of subplans Section 2 of subplans Section 3 of subplans Section 3.5 of subplans Section 3.7 of subplans Section 3.6 of subplans OEMP Section 7.2.3, Section 3.7.1 of subplans OEMP Section 5.15 OEMP Section 5.14 OEMP Section 7.2.3 Section 2.7.1 of subplans (where applicable) and OEMP Section 7.2.3 Section 2.7.2 of subplans	Compliant	
Revision of Strategies, Plans and Programs					
	Within 3 months of:	Interview - L Udage Arachchige , A Manning OEMP (version 9.0)	The strategies, programs and plans were previously updated to reflect the changes in the approved MOD 2 as pertains to the re-commencement of operations. The OEMP (version 9.0) and associated sub-plans have been approved by the	Compliant	

D6	(a) an annual review submitted under Condition D7;	DPE letter: Approval of the Operation Environmental Management Plan (V09) (SSD-7268-PA-G), 4 April 2023 MOD 3, MOD 4 and MOD5	Secretary. No update to plans or strategies been deemed necessary.	
	(b) an incident report submitted under Condition D8;			
	(c) an audit submitted under Condition D11; or			
	(d) the approval of a modification to the development consent,			
	The strategies, plans and programs required under this consent must be reviewed, and the Secretary must be notified in writing of the outcomes of any review.			
D6A	If necessary to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Secretary. Where revisions are required, the revised document must be submitted to the Secretary for approval within six weeks of the review required under condition D6, or such other timing as agreed by the Secretary. <i>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</i>	As above	The strategies, programs and plans were previously updated to reflect the changes in the approved MOD 2 as pertains to the re-commencement of operations. MOD 3 and MOD 4 did not involve or require updating of the plans or strategies. This will need to be considered prior to the commencement of MOD 5.	Compliant
Annual Review				
D7	Each year, unless otherwise agreed by the Secretary, the Applicant shall review the environmental performance of the Development to the satisfaction of the Secretary. This review shall:	ANNUAL REVIEW - Thomas Foods International Bourke Pty Ltd, December 2024	The development is adequately described in the Annual Reports	Compliant
	(a) describe the Development that was carried out during the reporting period, and the Development that is proposed to be carried out over the next reporting period;	ANNUAL REVIEW - Thomas Foods International Bourke Pty Ltd, December 2025	A comprehensive review of monitoring data and complaints is provided, including the appended reports.	
	(b) include a comprehensive review of the monitoring results and complaints records of the Development over the previous reporting period, which includes a comparison of these results against the:		A compliance statement id provided against requisite plans and programs.	
	(i) the relevant statutory requirements, limits or performance measures/criteria;		Summary monitoring data is provided.	
	(ii) requirements of any plan or program required under this consent;		Addressed in Section 8 - Environmental Performance.	
	(iii) the monitoring results of previous years; and		Statement of compliance is provided.	
	(iv) the relevant predictions in the EIS;		Graphical representation and trends are presented in supporting Appendices.	
	(c) identify any non-compliance over the previous reporting period, and describe what actions were (or are being) taken to ensure compliance;		No significant discrepancies observed during the audit period.	
	(d) identify any trends in the monitoring data over the life of the Development;		Section 4 of the Annual Reports	
	(e) identify any discrepancies between the predicted and actual impacts of the Development, and analyse the potential cause of any significant discrepancies; and			
(f) describe what measures will be implemented over the next reporting period to improve the environmental performance of the Development.				
Reporting				
Incident reporting				

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.	Interview - L Udage Arachchige , A Manning NSW EPA letter (DOC24/901267), 27 February 2023 NSW EPA letter (DOC24/901274), 11 December 2024	The NSW EPA received a public report on 23 September 2024 alleging TFI was not managing animal waste, comprising of blood and animal parts, at the Premises in a competent manner. The EPA investigated the incident and determined that section 64 of the Protection of the Environment Operations Act 1997 ("POEO Act") had potentially been breached. No further action beyond the Advisory letter was proposed. The NSW EPA received a public report on 26 May 2024 alleging TFI was causing odour impacts to the community whilst transporting offal to the Walgett Waste Facility. The responsibility for this sits with the licensed transportation company and not TFI. Based on proposed corrective actions it was determined no further action was required. As neither of the above incidents had the potential to cause environmental harm there was no requirement to notify the Secretary within 24 hours or provided with a detailed report on the incident within seven days. No other incidents or complaints have been recorded during the audit period.	Not triggered	
Regular reporting					
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.	Interview - L Udage Arachchige , A Manning https://thomasfoods.com/community/	Reporting on Environmental Performance only includes provision of 2024-2025 Annual Review (without Appendices) and no other Annual Reviews for the audit period. The auditor was advised that TFI's expectation was to publish the most recent Annual Review only. The auditor suggests that the suite of historic Annual Reviews as reviewed for this audit be provided on the website. The previous Independent Environmental Audit is provided along with an old 2024 version of the Complaints Register, noting no complaints recorded beyond that date.	Compliant	
Access to information					
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. <i>Note: This condition does not require any confidential information to be made available to the public.</i>	https://thomasfoods.com/community/	Community and Corporate Responsibility landing page. The EIS is available on the TFI website. MOD 3 approval is appended with OEMP. MOD 5 consolidated consent not on the website at the time of the audit inspection. Appended with OEMP, Rev 9.0 Template appended with OEMP - complaints register not updated annually. Noted	Non-compliant	NC08
Auditing					
Independent environmental audit					
	Within 2 years of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the Development. This audit shall: (a) be conducted by a suitably qualified, experienced and independent team of experts, including wastewater management, whose appointment has been endorsed by the Secretary;	DPE Letter Bourke Small Stock Abattoir (SSD-7268-PA-15) - 2026 Independent Environmental Audit - Auditor Endorsement Request, 14/04/2026	This audit team was endorsed by the DPHI and the audit was commenced in May 2026 with the audit site inspection undertaken 20 May 2026. This audit covers the period 25 May 2023 to 20 May 2026. This audit has been undertaken to meet the requirements condition D11.	Compliant	

D11	(b) include consultation with the relevant agencies; (c) assess the environmental performance of the Development and assess whether it is complying with the requirements in this consent, and any other relevant approvals, relevant EPL(s) (including any assessment, plan or program required under these approvals); (d) review the adequacy of any approved strategy, plan or program required under the abovementioned consents; and (e) recommend measures or actions to improve the environmental performance of the Development, and/or any strategy, plan or program required under these consents. <i>Note: The audit team must be led by a suitably qualified auditor, and include relevant experts in any other fields specified by the Secretary.</i>				
D12	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Noted		Not triggered	
Appendix A: Management and Mitigation Measures					
Commitment					
Air Quality and Odour					
Construction	Construction activities will be managed so that the works are conducted in a manner that minimises the generation of air emissions. Construction contractors will undertake regular environmental inspections of their works and worksite which will include; • visual inspection of dust generation; • inspection of the erosion and sediment controls; • ensuring vehicles entering/exit the site are covered to prevent escape of materials during transport; and • ensure the Mitchell Highway in the vicinity of the site is kept free of soil, and soil tracking onto the road network is prevented	IEA, 2020	Deemed compliant by the previous IEA, 2020	Compliant	
Operation	• Stock holding yards will be regularly cleaned.	OEMP	The relevant requirements of the OEMP, WasMP, WWMP and IMP were being implemented at the time of the audit inspection, including stockyard manure removal and washdown.	Compliant	
	• Potential odour-generating material will be removed from site in accordance with operational procedures.	WasMP WWMP Site Inspection	Potential odorous waste is managed in accordance with the WMP. No significant odours was detected on-site during the audit inspection. No odour complaints had been received in relation to the site during the current audit period.	Compliant	
	• Waste will be transported off site in enclosed systems.	Interviews - L Udage Arachchige , A Manning	Waste is removed from site in enclosed skip bins.	Compliant	
	• The wastewater treatment system will be maintained to avoid odour generation in accordance with operational procedures, including crust formation on the anaerobic ponds	Novatherm Boilers and Combustion - checklist - sample of 22 completed daily and weekly inspection checklists.	Crust formation in the anaerobic pond had still not yet established likely due to early days of re-commencement of operation. The ponds are regularly inspected and monitored in accordance with the management plans. No odour was detected in the immediate vicinity of the pond system. No odour complaints had been received in relation to the wastewater treatment system.	Compliant	
	• Irrigation droplet size will be controlled by preventing excessively high pressure in the system design, so as to minimise spray drift.		Irrigation from the centre pivot has not been reported to be over pressurised nor caused spray drift.	Compliant	
	• Spill management will include immediate clean-up of any spill/leakage in accordance with operational procedures.		Spill kits were observed by the auditor in chemical and dangerous goods storage areas.	Compliant	

	- Boilers will be installed and operated in accordance with manufacturer's instructions, including regular maintenance and tuning to minimise pollutant emissions and to optimise the fuel efficiency. - Unsealed access roads will be constructed and maintained so as to minimise wheel generated dust.		Installation of boilers was confirmed in the previous IEA, 2020. The auditor sighted completed regular inspection checklists.	Compliant	
			Unsealed roads on-site have compacted road base. Vehicle movement on-site at the time of the audit inspection did not appear to generate dust. The auditor was advised that these roads are wet down during unfavourable conditions to prevent <u>dust generation</u> .	Compliant	
	An odour complaint logbook will be maintained on site. In the event of a complaint, an investigation of any unusual odour sources within the site boundary will occur and appropriate action taken to mitigate these sources.		The OEMP contains a template complaints register. No odour complaints had been recorded in relation to site operations.	Compliant	
Traffic					
Construction	A construction traffic management plan will be prepared and implemented prior to the commencement of construction activities.	IEA, 2020	Deemed compliant in the previous IEA, 2020	Compliant	
Operation	Approximately 150 car parks will be provided on site. Car parking areas will have appropriate dimensions to accommodate the required number and size of the vehicles using the car park.	Site inspection	The carparking arrangements are unchanged and were deemed compliant in the previous IEA, 2020.	Compliant	
	The site access intersection with the Mitchell Highway will be designed to comply with the relevant Austroads intersection traffic capacity and safety design standards.		Deemed compliant in the previous IEA, 2020 and since unchanged.	Compliant	
	The new intersection into the project site on the Mitchell Highway will include a dedicated auxiliary left turn lane that will allow following traffic to pass a left turning vehicle. The AUL(s) treatment will be consistent with that provided in Figure 8.3 of Part 4A of Austroads Guide to Road Design.		As above	Compliant	
	Internal pedestrian linkages will be included in the design of the on-site car park to direct employees to the staff entrances to the abattoir.		As above	Compliant	
Health					
	Livestock will be sourced from suppliers, including properties and depots where standard operating procedures include that prior to transport, animals are rested to "empty out" to reduce urination and defecation during transport, and where screening of heavily pregnant does from transport occurs.	AUS-MEAT - Evaluation for Certification, 17/02/2026. TFI Standard Operating Procedures (SOP) - Maintenance, Chemical, Animal Welfare	AUS-MEAT Limited certify that having conducted an audit at TFI International Bourke Pty Ltd (Est Number : 2985) BOURKE, NSW, AUSTRALIA that it meets the requirements set out in the Industry Animal Welfare Standard for Livestock Processing Establishments. The scope of certification was for Goats and Sheep. The reviewed SOP's adequately address this aspect.	Compliant	
	All waste to be removed from site will be transported off site in enclosed containers and disposed of at an appropriately licensed facility.		All livestock waste is transported off-site in enclosed skip bins.	Compliant	
	The abattoir will be fenced (1.8m high man proof fencing) as shown in the detailed site plans in Appendix A (as modified) of the Response to Submissions Report, and access to the site will be controlled by a security gatehouse and boom gate.		The abattoir is fenced and a gatehouse with boom gate is in place.	Compliant	
	Onsite procedures will be implemented in accordance with industry standards in relation to provision of appropriate PPE and good hygiene practice.	TFI Standard Operating Procedures (SOP) - Maintenance, Chemical, Animal Welfare	The SOP's adequately address requirements for PPE and good hygiene practices and are implemented on-site.	Compliant	
	A Q fever vaccination program will be implemented to ensure all employees are vaccinated appropriately.	Q.Fever Management Procedure, Version 2.3 (WHS-S3E8-PRC18)	A Q-fever vaccination program is in place for all abattoir employees.	Compliant	

	Contract truck drivers will be encouraged to come directly to the site when carrying loaded trucks of livestock to avoid stopping in Bourke or North Bourke.	Interview - L Udage Arachchige TFI Standard Operating Procedures (SOP) - Maintenance, Chemical, Animal Welfare	Transport/Supplier responsibility is addressed in the SOP - Animal Welfare The auditor was advised that suppliers/drivers are requested by TFI to adhere to this requirement.	Compliant	
Biodiversity					
	Felling of hollow-bearing trees in the disturbance footprint will follow a two-stage clearing protocol, where surrounding non-hollow vegetation is cleared 24 hours prior to the hollow trees to allow fauna time to move.	IEA, 2020	Deemed non-compliant in the previous IEA. This does not fall under the responsibility of TFI and as such no further action is required.	Not triggered	
	- A biodiversity offset strategy will be prepared in consultation with OEH, DP&E and DPI-Lands within 12 months of project approval, and will involve: - Identifying if suitable credits are available on the market to meet offset requirements.	IEA, 2020	Deemed non-compliant in the previous IEA. OEH approved the execution of the Biodiversity Offset Agreement.	Compliant	
	- A biodiversity offset strategy will be prepared in consultation with OEH, DP&E and DPI-Lands within 12 months of project approval, and will involve: - Finding potential offset sites with the biodiversity values required to compensate for the project's impacts, including possibly within the project site and CAPRA landholdings.	IEA, 20202	Deemed non-compliant in the previous IEA. OEH approved the execution of the Biodiversity Offset Agreement.	Compliant	
	- A biodiversity offset strategy will be prepared in consultation with OEH, DP&E and DPI-Lands within 12 months of project approval, and will involve: - In the absence of suitable offset credits or properties, applying the variation criteria rules of the FBA and finding suitable offsets to meet the requirements.	IEA, 20202	Deemed not triggered in the previous IEA, 2020	Not triggered	
	- A biodiversity offset strategy will be prepared in consultation with OEH, DP&E and DPI-Lands within 12 months of project approval, and will involve: - Weeds will be managed within the project site in accordance with relevant DPI – Lands best practice guidelines.		Deemed non-compliant in the previous IEA. OEH approved the execution of the Biodiversity Offset Agreement.	Compliant	
	- A biodiversity offset strategy will be prepared in consultation with OEH, DP&E and DPI-Lands within 12 months of project approval, and will involve: - The PVP which applies to the broader property of 'Artesia' (of which the project site forms a small part) will be amended to exclude the project site.	Interview: A Manning	The PVP is covered in the Biobanking Agreement with OEH.	Compliant	
Heritage					
	An Aboriginal Heritage Management Plan will be prepared in consultation with OEH and the RAPs prior to construction commencing.	IEA, 2020 ACHMP, Version 4, 2016.	Deemed compliant in the previous IEA.	Compliant	
	Surface collection of known Aboriginal objects within the disturbance footprint of the project will be undertaken prior to construction works commencing. All areas within the disturbance footprint (as shown in the layout plan in Appendix A of the Response to Submissions report) that were not surveyed as part of the heritage assessment completed for the EIS will be surveyed, and surface collection of any artefacts found, prior to the commencement of construction activities in conjunction with the surface collection program for the site.	Letter - Murrawarri Provisional Council of State, dated 1/07/2026	Deemed compliant in the previous IEA.	Compliant	

	• A keeping place (designated secure area) will be established within the offices on site to store all Aboriginal stone artefacts collected from the project site. A selection of these artefacts will be put on display. All associated reports and records will be stored in close proximity to the artefacts in a bound hard copy and digital form. All materials will be held in a locked cabinet (both those objects on display and those in storage).		Not required.	Not triggered	
	• The identified Gurri tree (wild orange tree – <i>Capparis mitchellii</i>) will be avoided during construction of the site access road. Other Gurri trees identified within the project site will be managed in accordance with the approved Aboriginal Heritage Management Plan and in consultation with the RAPs.		Gurri Trees were avoided where possible during construction. The Murrawarri Provisional Council of State has acknowledged the successful moving of the "Bumble" tree and expressed they wish to "keep up our relationship with Thomas Foods moving forward."	Compliant	
Water resources					
Construction	• Effective temporary erosion and sediment control structures, such as hay bales and silt fencing, will be used to prevent soil loss and sediment-laden runoff from leaving the project site.	IEA, 2020	Deemed compliant in the previous IEA.	Compliant	
	• All clean surface water from upslope of construction areas will be diverted around areas of disturbance where required.		Deemed compliant in the previous IEA.	Compliant	
	• Areas disturbed as part of construction activities that are not part of the final footprint of the project will be promptly revegetated.		Deemed non-compliant by the previous IEA, 2020.	Not triggered	
	• Temporary erosion and sediment control structures used during construction will be regularly inspected and maintained.		Deemed non-compliant by the previous IEA, 2020.	Not triggered	
	• Two groundwater monitoring bores will be drilled at the commencement of construction works within the project site to intercept the water table in the Upper Darling Alluvial Groundwater Source, to a minimum depth of 20 m below ground level, to establish groundwater levels and baseline groundwater quality.		Deemed compliant in the previous IEA, 2020	Compliant	
Operation	• An assessment of the impact of the project against the minimal impact considerations in the Aquifer Interference Policy will be undertaken once sufficient baseline data is obtained, and prior to irrigation commencing.	OEMP Site inspection	Deemed compliant in the previous IEA, 2020	Compliant	
	• A 15 m wide vegetative buffer zone consisting of grasses, shrubs and trees will be maintained immediately downslope of the irrigation area to slow down and capture any runoff that occurs from the irrigation area.	IEA, 2020 Interview: L Udage Arachchige	A detailed survey of the irrigation area has been undertaken and ensures that a 15m buffer is present on all sides of the irrigation area.	Compliant	
	• The wastewater treatment ponds will be lined so as to prevent any seepage occurring.		Deemed compliant in the previous IEA, 2020. The lining was observed to be in place and in good order.	Compliant	
	• Storage areas for all liquids will be appropriately bunded.		Refer findings to C22 in relation to Dangerous Goods in the external shed. Storage areas for all liquids (chemical and dangerous goods, and wastewater treatment ponds) are typically bunded.	Compliant	
	• Spill kits including absorbing materials will be provided nearby handling and storage areas.		Spill kits were observed by the auditor in the chemical and dangerous goods storage areas.	Compliant	
	• Water use will be minimised through regular inspections of pipes and connections to ensure there is minimal leakage occurring, use of high impact, low flow nozzles where high pressure is required, dry collection of manure, dry cleaning of equipment prior to wash down; and prioritising the order of washdown procedures e.g. stands, walls and then the floor.		Deemed compliant in the previous IEA, 2020. The auditor was advised water infrastructure remains as per the OEMP. Dry manure collection using small front end loader was observed on-site. Collected stormwater is used to irrigate recently seeded grassed areas of the site.	Compliant	
b					

	iii) permeability and water logging measures; and iv) measures to account for yield reductions due to salinity and sodicity. design and management of the bund and sediment dam to be constructed to capture runoff from the irrigation area. • Soil samples will be taken during construction works and further analysed to confirm the phosphorus absorption rates in comparison to the 4,500 kg/ha derived in the irrigation study prepared as part of the EIS.	IEA, 2020	This aspect deemed compliant in the previous IEA, 2020		
Greenhouse Gas					
	• Regular checks of seals on all refrigerated areas will be undertaken as part of routine site maintenance.	OEMP Monthly Refrigeration Checks Interview - L Udage Arachchige	Addressed in Section 3.5 of the OEMP. The auditor sighted a sample of routine (monthly) refrigeration checklists. The auditor was advised that the site maintenance team also regularly inspect during their daily activities.	Compliant	
	• Where possible, high efficiency lighting will be used.	IEA, 2020 Interview: L Udage Arachchige	Deemed compliant in previous IEA, 2020 No significant changes to lighting in the reporting period.		
	• The option of installing solar panels at the abattoir will be assessed and determined within three years of commencement of operations.	Bourke_1.1MW Rooftop (solar Investigation), AMPC for TFI Bourke_1.3MW Ground Mount (Solar Assessment), AMPC for TFI	Design and costed feasibility studies have been undertaken for the abattoir.		
Socio-economic					
	TFI International Pty Ltd approach to employment will adopt the following principles: • a preference for local employment wherever possible; and • encourage local contractors to tender for work, both during the construction and operations phases. Selection of suppliers will be based on merit, assessed capability and competitive dynamics.	Site Inspection Interview - L Udage Arachchige Interview - L Udage Arachchige	The opportunity for employment at Bourke Abattoir is advertised at various locations in the township of Bourke (not sighted by the auditor) and also at the front entrance to the site. Local contractors are used for plumbing and irrigation maintenance services. Other opportunities to use local contractors are identified via networking to seek out suitable providers.	Compliant	
Environment Protection Licence - EPL 20918					
1. Administrative Conditions					
A1	What the licence authorises and regulates				
A1.1	This licence authorises the carrying out of the scheduled development work listed below at the premises listed in A2. Initial site works: On-site earthworks and construction in preparation for commencement of scheduled activities as approved by Department of Planning and Environment on 5 October 2022 (reference SSD-7268-Mod-2).	Noted	Noted - SSD 7268 (MOD 2) approved by the Secretary on 5 October 2022 and was current at the time of the audit for the operating activity.	Compliant	
A1.2	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale	Noted	The current activity at the time of the audit aligns with the scheduled activity.	Compliant	

	of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Livestock processing activities</td><td>Slaughtering or processing animals</td><td>> 30000 T annual processing capacity</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Livestock processing activities	Slaughtering or processing animals	> 30000 T annual processing capacity					
Scheduled Activity	Fee Based Activity	Scale										
Livestock processing activities	Slaughtering or processing animals	> 30000 T annual processing capacity										
A1.3	The licensee is prohibited from carrying out the scheduled activities identified at condition A1.2 during the undertaking of the scheduled development work identified at condition A1.1.	IEA, 2020 Interview: L Udage Arachchige, A Manning CONTOUR AND FEATURE SURVEY, Premise, 2023	The audit found that livestock processing activities were ongoing at the time of the current audit, noting that the initial site works: on-site earthworks and construction in preparation for commencement of scheduled activities, was completed and did not fall within this audit period	Compliant								
A2 Premise or plant to which this licence applies												
A2.1	The licence applies to the following premises: <table><tr><th>Premises Details</th></tr><tr><td>THOMAS FOODS INTERNATIONAL BOURKE</td></tr><tr><td>MITCHELL HIGHWAY</td></tr><tr><td>BOURKE</td></tr><tr><td>NSW 2840</td></tr><tr><td>LOT 17 DP 753546</td></tr><tr><td>REFER TO PREMISES MAP TITLED 'FIGURE 2: UPDATED MONITORING POINT LOCATIONS' IN DOCUMENT LOCATED AT DOC24/1040116</td></tr></table>	Premises Details	THOMAS FOODS INTERNATIONAL BOURKE	MITCHELL HIGHWAY	BOURKE	NSW 2840	LOT 17 DP 753546	REFER TO PREMISES MAP TITLED 'FIGURE 2: UPDATED MONITORING POINT LOCATIONS' IN DOCUMENT LOCATED AT DOC24/1040116	Noted	This audit considered the scheduled activity being undertaken at the identified premises.	Compliant	
Premises Details												
THOMAS FOODS INTERNATIONAL BOURKE												
MITCHELL HIGHWAY												
BOURKE												
NSW 2840												
LOT 17 DP 753546												
REFER TO PREMISES MAP TITLED 'FIGURE 2: UPDATED MONITORING POINT LOCATIONS' IN DOCUMENT LOCATED AT DOC24/1040116												
A2.2	The premises location is shown on the map below. 	Noted	As above	Compliant								
A2.3	For the purposes of Condition A2.2, "premises location" means the locations of monitoring points referred to in the licence, as described at Condition P1.2 and Condition P1.3.	Noted	The "premises location" applies to the location of monitoring points.	Compliant								
A3 Information supplied to the EPA												
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and	IEA, 2020 and 2023 NSW EPA - Response to Modification of State Significant Development – SSD 726 (DOC22/824155), 20 September 2022 NSW EPA - Environment Protection Licence 20918 – Licence Variation (DOC25/38063),	EPL application process deemed compliant in the previous audit. NSW EPA accepts licence variation and EPL has been updated to reflect relevant changes. Works are being conducted in accordance with the licence.	Compliant								

		b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	dated 21 January 2025																																																		
2. Discharges to Air and Water and Applications to Land																																																					
P1 Location of Monitoring/ discharge points and areas																																																					
P1.1	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.		Noted	The utilisation areas are applicable at site with regard to monitoring and setting of limits.	Compliant																																																
P1.2	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <table><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>3</td><td>Sediment dam</td><td>Sediment dam</td><td>Sediment stormwater dam to the east of the abattoir complex labelled as 'Retention Pond' on map titled 'Figure 2: Updated Monitoring Point Locations' (EPA Reference DOC24/1045116)</td></tr><tr><td>4</td><td>Groundwater monitoring</td><td></td><td>Groundwater monitoring bore to the east of the abattoir complex labelled as 'GM1' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>5</td><td>Groundwater monitoring</td><td></td><td>Groundwater monitoring bore to the west of the abattoir complex labelled as 'GM2' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>6</td><td>Effluent quality and volume discharge</td><td>Effluent quality and volume discharge</td><td>Irrigation pump at effluent treatment pond No. 2 labelled as 'Effluent Quality & Volume Discharge' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>16</td><td>Manure monitoring</td><td></td><td>Manure compost pad labelled as 'Manure Monitoring' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>17</td><td>Soil Monitoring</td><td></td><td>Effluent utilisation area labelled as 'SM1' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>18</td><td>Soil Monitoring</td><td></td><td>Effluent utilisation area labelled as 'SM2' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>19</td><td>Soil Monitoring</td><td></td><td>Effluent utilisation area labelled as 'SM3' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>20</td><td>Soil Monitoring</td><td></td><td>Effluent utilisation area labelled as 'SM4' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>21</td><td>Soil Monitoring</td><td></td><td>Effluent utilisation area labelled as 'SM5' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>22</td><td>Soil Monitoring</td><td></td><td>Effluent utilisation area labelled as 'SM6' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr></table>		EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	3	Sediment dam	Sediment dam	Sediment stormwater dam to the east of the abattoir complex labelled as 'Retention Pond' on map titled 'Figure 2: Updated Monitoring Point Locations' (EPA Reference DOC24/1045116)	4	Groundwater monitoring		Groundwater monitoring bore to the east of the abattoir complex labelled as 'GM1' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	5	Groundwater monitoring		Groundwater monitoring bore to the west of the abattoir complex labelled as 'GM2' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	6	Effluent quality and volume discharge	Effluent quality and volume discharge	Irrigation pump at effluent treatment pond No. 2 labelled as 'Effluent Quality & Volume Discharge' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	16	Manure monitoring		Manure compost pad labelled as 'Manure Monitoring' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	17	Soil Monitoring		Effluent utilisation area labelled as 'SM1' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	18	Soil Monitoring		Effluent utilisation area labelled as 'SM2' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	19	Soil Monitoring		Effluent utilisation area labelled as 'SM3' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	20	Soil Monitoring		Effluent utilisation area labelled as 'SM4' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	21	Soil Monitoring		Effluent utilisation area labelled as 'SM5' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	22	Soil Monitoring		Effluent utilisation area labelled as 'SM6' on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	Noted	As above	Compliant
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P1.3	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises. <table><tr><th>EPA Identification no.</th><th>Type of monitoring point</th><th>Location description</th></tr><tr><td>1</td><td>Meteorological Station</td><td>Meteorological station labelled as "Meteorological Station" on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)</td></tr><tr><td>2</td><td>Noise monitoring</td><td>Properties located to the south of the premises as depicted in document titled 'Bourke Small Abattoirs - SSD 7268 - Environmental Impact Statement' Volume 1 - Figure 3.2 - Nearest receptors' (EPA reference: DOC16/12032-01)</td></tr></table>		EPA Identification no.	Type of monitoring point	Location description	1	Meteorological Station	Meteorological station labelled as "Meteorological Station" on map titled 'Figure 5: Updated Monitoring Points Map for EPL 20918' (EPA Reference DOC24/1039824)	2	Noise monitoring	Properties located to the south of the premises as depicted in document titled 'Bourke Small Abattoirs - SSD 7268 - Environmental Impact Statement' Volume 1 - Figure 3.2 - Nearest receptors' (EPA reference: DOC16/12032-01)	Site inspection Interview: L Udage Arachchige , A Manning	The Meteorological Station was observed in place at site and live data website was sighted. Noise monitoring is only required in response to a noise complaint. No complaints received in relation to noise during the audit reporting period.	Compliant																																							
EPA Identification no.	Type of monitoring point	Location description																																																			
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3. Limit conditions																																																					
LIMIT CONDITIONS																																																					
L1 Pollution of Waters																																																					

L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997	Site inspection Interview: L Udage Arachchige , A Manning	No complaints received and no environmental incidents recorded in breach of Section 120 of the Environment Operations Act 1997 during the audit period.	Compliant													
L1.2	The licensee must take all practical measures to avoid or minimise oil and grease, TSS etc. contained in wet weather discharges	OEMP	General housekeeping at the site continues to be observed to be good with oil and grease type materials mostly stored in the pump shed. All livestock waste is stored in sealable skip bins. Area of exposed soils around the main abattoir development appeared to have been successfully stabilised since the previous 2023 audit. Some improvements to the storage of dangerous goods (i.e. segregation) is required for fuels in the pump shed, however these are stored under cover.	Compliant													
L2 Concentration Limits																	
L2.1	For each monitoring/discharge point or utilisation 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		Monitoring results are within criteria, however the audit found that not all points have been sampled as per this EPL. Refer Section M for more detail	Compliant													
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.		The Groundwater sample tested was within the stated pH range.	Compliant													
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table/s	Interview - L Udage Arachchige	No water pollution incidents recorded.	Not triggered													
L2.4	Water and/or Land Concentration Limits POINT 3 <table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 Percentile concentration limit</th><th>90 Percentile concentration limit</th><th>30GM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr></table>	Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	30GM concentration limit	100 percentile concentration limit	Total suspended solids	milligrams per litre				50	Interview - L Udage Arachchige	No water discharges from the site and sediment dam.	Not triggered	
Pollutant	Units of Measure	50 Percentile concentration limit	90 Percentile concentration limit	30GM concentration limit	100 percentile concentration limit												
Total suspended solids	milligrams per litre				50												
L3 Volume and mass limits																	
L3.1	For each discharge point or utilisation area specified below (by a point number), the volume/mass of: a) liquids discharged to water; or; b) solids or liquids applied to the area; must not exceed the volume/mass limit specified for that discharge point or area. <table><tr><th>Point</th><th>Unit of Measure</th><th>Volume/Mass Limit</th></tr><tr><td>6</td><td>kilolitres per day</td><td>1550</td></tr></table>	Point	Unit of Measure	Volume/Mass Limit	6	kilolitres per day	1550	Daily Water and Wastewater 2023 - 2026 2025 EPL Annual Return	No discharges to water. The daily records for the site has shown an increase in effluent irrigation in line with increase production throughput. Average discharge has been reported for "Irrigation Water Discharged" in the order of 360 kilolitres per day. The effluent irrigation has been recorded to exceed 1550 kilolitres per day on a number of occasions from 2024 onwards.	Non-compliant	NC10						
Point	Unit of Measure	Volume/Mass Limit															
6	kilolitres per day	1550															
L4 Waste																	
L4.1	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal of any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence. 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.	Interview: L Udage Arachchige , A Manning Site inspection	No waste material is received at the site. All livestock waste material is trucked off-site for rendering.	Compliant													
L5 Noise limits																	

L5.1	Noise generated at the premises that is measured at each noise monitoring point established under this licence 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. <table><tr><th>Time period</th><th>Measurement parameter</th><th>Measurement frequency</th><th>Noise level dB(A)</th></tr><tr><td>Day</td><td>Day-LAeq (15 minute)</td><td>-</td><td>35</td></tr><tr><td>Evening</td><td>Evening-LAeq (15 minute)</td><td>-</td><td>35</td></tr><tr><td>Night</td><td>Night-LAeq (15 minute)</td><td>-</td><td>35</td></tr><tr><td>Night</td><td>LAmaz</td><td>-</td><td>45</td></tr></table>	Time period	Measurement parameter	Measurement frequency	Noise level dB(A)	Day	Day-LAeq (15 minute)	-	35	Evening	Evening-LAeq (15 minute)	-	35	Night	Night-LAeq (15 minute)	-	35	Night	LAmaz	-	45	Interview: L Udage Arachchige , A Manning OEMP	No noise complaints received since the re-commencement of operations at site to trigger noise monitoring.	Compliant	
Time period	Measurement parameter	Measurement frequency	Noise level dB(A)																						
Day	Day-LAeq (15 minute)	-	35																						
Evening	Evening-LAeq (15 minute)	-	35																						
Night	Night-LAeq (15 minute)	-	35																						
Night	LAmaz	-	45																						
L5.2	For the purposes of condition L5.1: • 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. • Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.	Noted		Not triggered																					
L5.3	The noise emission limits set out in condition L5.1 apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.	Noted	No noise monitoring required to be undertaken.	Not triggered																					
L5.4	For the purposes of condition L5.3: a) Data recorded by a meteorological station installed on site must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) are to be determined by the sigma-theta method referred to in Part 4E of Appendix E to the NSW Industrial Noise Policy.	Site inspection Interview: L Udage Arachchige	Meteorological Station and live data website observed at site including wind speed in m/s.	Compliant																					
L5.5	To determine compliance: a) with the Leq(15 minute) noise limits in condition L5.1, the noise measurement equipment must be located: • approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or • within 30 metres of a dwelling façade, but not closer than 3 metres, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or, where applicable • within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) with LAmaz noise limits in condition L5.1, the noise measurement equipment must be located within 1 metres of a dwelling façade. c) with the noise limits in condition L5.1 the noise measurement equipment must be located: • at the most affected point at a location where there is no dwelling at the location; or • at the most affected point within an area at a location prescribed by conditions L5.5(a) or L5.5(b).	Noted	No noise monitoring required to be undertaken.	Not triggered																					
L5.6	A non-compliance of condition L5.1 will still occur where noise generated from the premises in excess of the appropriate limit is measured: • at a location other than an area prescribed by conditions L5.5(a) and L5.5(b); and/or • at a point other than the most affected point at a location.	Interview: L Udage Arachchige	There have been no noise complaints received during the current audit period.	Not triggered																					

L5.7	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measure by the noise monitoring equipment.	Noted	As above	Not triggered	
L6	Blasting				
L6.1	Blasting at the premises is prohibited.	Noted	No blasting has occurred at the site.	Not triggered	
L7	Hours of Operation				
L7.1	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 1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays.	IEA, 2020 Interview: L Udag Arachchige , A Manning	Deemed compliant in the previous IEA, 2020. Current MOD 5 construction activities being undertaken are restricted to between hours of 7:00am and 6:00pm Monday to Friday.	Compliant	
L7.2	Works outside of the hours identified in condition L7.1 may be undertaken in the following circumstances: a) works that are inaudible at the nearest receivers; b) works agreed to in writing by the Secretary of the NSW Department of Planning and Environment; c) or 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.	As above	As above	Compliant	
L7.3	Unless otherwise specified by any other condition of this licence, scheduled activities are permitted to operate 24 hours a day Monday to Sunday.	Interview: L Udag Arachchige	Operating hours were 24 hours daily of shift work at the time of the audit inspection.	Compliant	
L8	Potentially Offensive Odour				
L8.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises. Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environmental protection licence as a potentially offensive odour and the odour emitted in accordance with the conditions of a licence directed at minimising odour.	Interview: L Udag Arachchige , A Manning Complaint Register Refer condition D8 above	No odour complaints received in relation to the site operations. No significant or potentially offensive odour detected in or around the site during the audit inspection. Refer D8 above regarding odour complaint in relation to off-site transport during the audit period. The responsibility for this lies with the licenced transport contractor. TFI worked with the transport company to implement corrective actions to address the identified issue.	Compliant	
L8.2	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.	Noted		Not triggered	
4. Operating Conditions	Operating Conditions				
O1	Activities must be carried out in a competent manner				
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity	Induction and training records Inspection and maintenance programs OEMP and sub-plans	Training and induction records are managed in a database on site as sighted by the auditor. The OEMP and sub-plans adequately address environmental management aspects and were being implemented for the operation at the site. The current audit found inadequacy with regard to the appropriate storage chemicals and dangerous goods on site (refer C22 above) Waste management, storage and handling was being undertaken in accordance with the relevant management plans.	Non-compliant	NC11
O2	Maintenance of plant and equipment				
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and	Maintenance records Training and induction database	Inspection and maintenance program in place at site. Training and induction records are managed in a database on site as sighted by the auditor, included as specific training requirements for operation of plant and	Compliant	

	b) must be operated in a proper and efficient manner.		equipment.		
O3	Dust				
O3.1	All areas in or on the premises must be maintained in a condition that prevents or minimises the emission into the air of air pollutants (which includes dust).	Site inspection Interview: L Udag Arachchige	The unsealed road around the abattoir consist compacted road base. The auditor was advised that the roads are wet down during unfavourable condition to prevent dust generation. Disturbed areas around the operation area of the site had been recently seeded (grass) and were being actively irrigated to promote stabilisation at the time of the audit inspection.	Compliant	
O3.2	Trucks entering and leaving the premises that are carrying any material must have their loads covered at all times to prevent the generation of dust, except during loading and unloading.	Site inspection Interview: L Udag Arachchige	All trucks carrying livestock waste material from site are covered.	Compliant	
O3.3	Any activity in or on the premises must be carried out by such practicable means as to prevent or minimise the emission into the air of air pollutants (which includes dust).	As above	As above. Manure management at the site not expected to generate significant air pollutants, noting final cleaning down is a wet process. Current MOD 5 construction works will need to consider this requirement.	Compliant	
O3.4	Any plant in or on the premises must be operated by such practicable means as to prevent or minimise the emission into the air or air pollutants (which includes dust).	Site inspection OEMP	The OEMP adequately addresses dust minimisation strategies for operating plant.	Compliant	
O4	Effluent application to land				
O4.1	The quantity of effluent/solids applied to the utilisation area must not exceed the capacity of the area to effectively utilise the effluent/solids. For the purpose of this condition, 'effectively utilise' includes the use of the effluent/solids for pasture or crop production, as well as the ability of the soil to absorb the nutrient, salt, hydraulic load and organic material.	Interview: L Udag Arachchige , A Manning	Irrigation rates have on occasion exceeded the daily allowance. This is not expected to overall impact the hydraulic loading due to the overall relatively low rates of irrigation. Solids are applied to the irrigation in a controlled and measured manner. No effective utilisation is currently undertaken in the irrigation area as discussed against Appendix A - Waste, Wastewater and Irrigation above. No ponding of water was observed during the site inspection.	Compliant	
O4.2	At least 14 days prior to a utilisation area being rendered unavailable for use, the EPA must be advised in writing of this intention.	Noted		Not triggered	
O4.3	Effluent application must not occur in a manner that causes surface runoff.	Site Inspection	No pooling of water or runoff was observed during the site inspection.	Compliant	
O4.4	Spray from effluent application must not drift beyond the boundary of the premises.	Site Inspection Interview: L Udag Arachchige	Spray drift would not be expected with the current irrigation arrangements using the centre pivot irrigator.	Compliant	
O4.5	Livestock access to any effluent application area must be denied during effluent application and until the applied effluent area has dried.	Site inspection	Livestock is excluded from the irrigation area. Native animals were present in number in the irrigation area at the time of the audit inspection. The auditor was advised that efforts are made to move them on prior to irrigating.	Compliant	
O4.6	The licensee must retain the utilisation area.	Noted	The irrigation area currently forms part of the project development.	Compliant	
O4.7	Effluent application must not occur on any other area except the defined utilisation area.	Site inspection Interview: L Udag Arachchige	Irrigation is only undertaken in the designated area.	Compliant	
O5	Process and management				
O5.1	All tanks and storage areas for drums containing material that has potential to cause environmental harm must be banded or have an alternative spill containment system in-place. The banding and/or spill containment systems must be properly designed, engineered, and constructed to be suitable for the material types and quantities stored therein in accordance with all appropriate standards, including Australian Standards (AS)1940 and AS1596.	OEMP Site inspection	Refer approval condition C22 finding above. Tanks and storage areas for drums were found to be adequately banded.	Compliant	
O5.2	The holding pen surface must be maintained to prevent infiltration.	Inspection	The holding pen surface is concrete hardstand	Compliant	

O5.3	Solids must be stored on an impermeable pad within the controlled drainage area.	Inspection	Manure is collected from the holding areas and put into a concrete bay/bunker prior to being applied to land.	Compliant	
O6	Waste management				
O6.1	Any waste materials removed from the site must only be disposed of at a waste management facility or premises lawfully permitted to accept the materials.	As above TFI Bourke - Waste Disposal procedure (undated) General Waste Disposal Receipts	General waste is collected from site via Bourke Shire Council's waste contractor for disposal at the Council landfill. Livestock processing waste is taken off-site to the TFI facility tin Tamworth for rendering. <u>Wastewater is considered separately below.</u>	Compliant	
O6.2	The licensee must ensure that any liquid and/or non liquid waste generated and/or stored at the premises is assessed and classified in accordance with the EPA's Waste Classification Guidelines as in force from time to time.	WasMP	Addressed in the WasMP.	Compliant	
O7	Other operating conditions				
O7.1	All above ground storage facilities containing flammable and combustible liquids must be bunded in accordance with Australian Standard AS 1940-2004.	OEMP Site inspection	All above ground storage was observed to be appropriately bunded.	Compliant	
O7.2	All Toxic Chemicals must be stored in accordance with the requirements of AS/NZS4452- The Storage and Handling of Toxic Substances.	Site Inspection	Chemicals in the abattoir storage room were stored with adequate bund for the volumes present at the time of the audit. However, refer condition C22 with regard to inappropriate chemical segregation and placarding.	Non-compliant	NC12
O7.3	Effluent pools All effluent, contaminated and stormwater structures internal surfaces must have an equivalent to, or better than, a clay liner of permeability of 10-9 m/s over a minimum depth of 900mm or an equivalent alternative. When an alternative liner is proposed, a minimum of 600mm compacted base materials must be used to protect the liner.	IEA, 2023	Deemed compliant in previous audit. Effluent ponds are adequately lined.	Compliant	
5. Monitoring and recording conditions					
M1	Monitoring records				
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Summary Monitoring Data provided on TFI website. THOMAS FOODS INTERNATIONAL BOURKE PTY LIMITED – ENVIRONMENTAL MONITORING, Premise, May 2023, May 2024, November 2025 and September 2025. TFI Bourke Environmental WQ Quality ResultsMonitoring records (April 23 to March 2026)	The monitoring information is provided in various forms. The monitoring data provided in the Premise reports and summarised in WW Quality Monitoring records are relevant to the EPL monitoring requirements.	Compliant	
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	THOMAS FOODS INTERNATIONAL BOURKE PTY LIMITED – ENVIRONMENTAL MONITORING, Premise, May 2024, November 2025 and September 2025. TFI Bourke Environmental WQ Quality ResultsMonitoring records (April 23 to March 2026)	The sample collection points in the report and summary have unique identifiers that are not directly linked to the EPL Points. The auditor suggest that this linkage be clearly identified to improve legibility. This was the first round of monitoring for TFI under the EPL. The EPA had not requested monitoring data during the current audit period.	Compliant	
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken;	Interview - L Udage Arachchige	Premise reports and monitoring data sheets include sampling dates.	Compliant	

	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.		The time of sample collection is recorded with monitoring data. Sampling points are clearly identified. Samplers names are included in data sets and reports.																																																																																																																																																													
M2	Requirement to monitor concentration of pollutants discharged																																																																																																																																																															
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	THOMAS FOODS INTERNATIONAL BOURKE PTY LIMITED – ENVIRONMENTAL MONITORING, Premise, May 2024, November 2025 and September 2025. TFI Bourke Environmental WQ Quality ResultsMonitoring records (April 23 to March 2026) Groundwater and Soil Monitoring Records - 2024/2025, 2025/2026 EPL Annual Returns - 2023/2024, 2024/2025 Interview - L Udage Arachchige	Monitoring and discharge points have been monitored and per requirements of this condition during the audit period.	Compliant																																																																																																																																																												
M2.2	Water and/ or Land Monitorine Requirements POINT 3 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Grab sample</td></tr></table> POINT 4,5 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Electrical conductivity</td><td>microsiemens per centimetre</td><td>Yearly</td><td>In situ</td></tr><tr><td>Nitrogen (nitrate)</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Nitrogen (total)</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Yearly</td><td>In situ</td></tr><tr><td>Phosphorus (total)</td><td>milligrams per litre</td><td>Yearly</td><td>Grab sample</td></tr><tr><td>Standing Water Level</td><td>metres</td><td>Yearly</td><td>In situ</td></tr><tr><td>Total dissolved 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conductivity	microsiemens per metre	Quarterly	In situ	Exchangeable calcium	milligrams per litre	Quarterly	Grab sample	Exchangeable magnesium	milligrams per litre	Quarterly	Grab sample	Exchangeable potassium	milligrams per litre	Quarterly	Grab sample	Exchangeable sodium	milligrams per litre	Quarterly	Grab sample	Nitrogen (ammonia)	milligrams per litre	Quarterly	Grab sample	Nitrogen (nitrate)	milligrams per litre	Quarterly	Grab sample	Nitrogen (nitrite)	milligrams per litre	Quarterly	Grab sample	Nitrogen (total)	milligrams per litre	Quarterly	Grab sample	pH	pH	Quarterly	In situ	Phosphorus (total)	milligrams per litre	Quarterly	Grab sample	Sodium Adsorption Ratio	-	Quarterly	Grab sample	Total suspended solids	milligrams per litre	Quarterly	Grab sample	Pollutant	Units of measure	Frequency	Sampling Method	Available phosphorus	milligrams per kilogram	Yearly	Special Method 1	Electrical conductivity	microsiemens per metre	Yearly	Special Method 1	Exchangeable calcium	centimoles of positive 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Point 4,5 - GM1 and GM2 are monitored annually for the requisite analytes and parameters Point 6 - monitored monthly for the requisite analytes and parameters (Bourke Effluent Monitoring Sheet). Point 17,18,19,20,21,22 - monitored annually for the requisite analytes and parameters.	Compliant
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M2.3	For the purpose of the table(s) above, Special Method 1 means that representative composite soil samples are to be collected from the top soils (0-10 cm) yearly and from the subsoils (>10 cm) every 3 years in accordance with the Environmental Guidelines: Use of effluent by irrigation (DEC 2004).	THOMAS FOODS INTERNATIONAL BOURKE PTY LIMITED – ENVIRONMENTAL MONITORING, Premise, May 2024, November 2025 and September 2025.	Premise reports identify the requisite sampling regime and that composite sampling of subsoil is to be conducted in the 2026/2027 round of soil monitoring.	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.	Interview - A L Udage Arachchige	Deemed non-compliant in the 2023 audit. Monitoring has continued to be undertaken throughout the reporting period while irrigating..	Not triggered																															
M3	Testing methods - concentration limits																																		
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	THOMAS FOODS INTERNATIONAL BOURKE PTY LIMITED – ENVIRONMENTAL MONITORING, Premise, May 2024, November 2025 and September 2025. Procedure: Bourke Water and Wastewater Sampling Protocol	While there is no specific reference is made to the Approved Methods Publication in the Environmental Monitoring Reports and TFI procedures, environmental monitoring and sampling and analysis programs appears to be undertaken in accordance with the requisite methods and standards. The auditor suggests that the environmental monitoring programs and Environmental Monitoring reports be regularly reviewed to ensure compliance with the Approved Methods Publication or otherwise approved method.	Compliant																															
M4	Weather monitoring																																		
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively. POINT 1 <table><tr><th>Parameter</th><th>Sampling method</th><th>Units of measure</th><th>Averaging period</th><th>Frequency</th></tr><tr><td>Rainfall</td><td>AM-4</td><td>millimetres</td><td>1 hour</td><td>Continuous</td></tr><tr><td>Wind Direction at 10 metres</td><td>AM-2 & AM-4</td><td>Degrees</td><td>15 minutes</td><td>Continuous</td></tr><tr><td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>15 minutes</td><td>Continuous</td></tr><tr><td>Siting</td><td>AM-1 & AM-4</td><td>-</td><td>-</td><td>-</td></tr><tr><td>Sigma Theta</td><td>AM-2 & AM-4</td><td>degrees Celsius</td><td>-</td><td>Continuous</td></tr></table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Rainfall	AM-4	millimetres	1 hour	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	Degrees	15 minutes	Continuous	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	15 minutes	Continuous	Siting	AM-1 & AM-4	-	-	-	Sigma Theta	AM-2 & AM-4	degrees Celsius	-	Continuous	Site inspection Interview: L Udage Arachchige	Meteorological Station and live data website observed at site. The Meteorological Station measures the required parameters.	Compliant	
Parameter	Sampling method	Units of measure	Averaging period	Frequency																															
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Sigma Theta	AM-2 & AM-4	degrees Celsius	-	Continuous																															
M5	Recording of pollution complaints																																		
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	OEMP - Complaints Register Complaints Register Bourke 2024.xls	A complaints register has been prepared and a Form for recording complaints appended to the OEMP (Form 5). No direct complaints had been received up to the time of the audit. However, complaints were raised directly to the NSW EPA during the audit period. One is recorded on the Complaints Register Bourke - 2024. The second complaint relating to off-site transport of waste and associated odour was not on the register as it was considered the responsibility of the licenced waste transportation contractor.	Compliant																															
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	OEMP - Form 5 Complaints Register Bourke 2024.xls	Form5: Complaints Form and the complaints register addresses the required details.	Compliant																															
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made	Interview: L Udage Arachchige, A Manning	Records of complaints made available, despite oner not being presented in the complaints register.	Compliant																															
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Interview: L Udage Arachchige	No requests made.	Not triggered																															
M6	Telephone complaints line																																		

M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Telephone Complaints Line/s OEMP	Signage at the entrance to the site includes a phone number (02 6865 4430) to contact site. The OEMP includes a complaints line (02 6865 0400). The auditor attempted to call the latter on 12/07/2026 and found this line to still be disconnected. Calling the number on the site signage refers you to an site administrator, who advised they were able to take a complaint, if needed. As there are presently conflicting phone numbers it is not clear to the public which is the complaints line, noting the site signage does not clearly indicate the number presented can be used to lodge a complaint. The OEMP has not been updated since the previous audit.	Non-compliant	NC13																		
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.		The site signage provides a number to contact the site whereby a complaint can be made.	Compliant																			
M6.3	The preceding two conditions do not apply until - the date of the issue of this licence.	Noted		Compliant																			
M7	Requirement to monitor volume or mass																						
M7.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. <table><tr><td colspan="3">POINT 6</td></tr><tr><td>Frequency</td><td>Unit of Measure</td><td>Sampling Method</td></tr><tr><td>Continuous during discharge</td><td>kilo litres per day</td><td>In line instrumentation</td></tr></table> <table><tr><td colspan="3">POINT 10</td></tr><tr><td>Frequency</td><td>Unit of Measure</td><td>Sampling Method</td></tr><tr><td>Yearly</td><td>tonnes</td><td>Special Method 2</td></tr></table>	POINT 6			Frequency	Unit of Measure	Sampling Method	Continuous during discharge	kilo litres per day	In line instrumentation	POINT 10			Frequency	Unit of Measure	Sampling Method	Yearly	tonnes	Special Method 2	TFI Bourke Environmental WQ Quality Results Monitoring records (April 23 to March 2026) EPL 20918 Spreadsheet - Manure Uantities EPL 20918	Irrigation Water (Point 6) records for the audit period sighted in spreadsheet measured in kL per day. The manure disposal via land application to the irrigation area has been recorded as approximate tonnes applied since 12/09/2024. That data demonstrates a steady increase in the amount of manure disposed form a low of 12 tonnes to a maximum of 40 tonnes per application consistent with the increase on stock throughput.  No mass of pollutants emitted to air units of measure are stipulated by the licence.	Compliant	
POINT 6																							
Frequency	Unit of Measure	Sampling Method																					
Continuous during discharge	kilo litres per day	In line instrumentation																					
POINT 10																							
Frequency	Unit of Measure	Sampling Method																					
Yearly	tonnes	Special Method 2																					
M7.2	For the purpose of the table above, Special Method 2 means the amount of manure solids removed from the manure composting pad that is estimated and/or weighed.	Noted	Noted	Compliant																			
6. Reporting conditions																							
R1	Annual return documents																						
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan.	EPL Annual Returns - 2023/2024, 2024/2025	TFI (as the current licensee) has submitted two Annual Returns since the previous. The Annual Returns address requirements 1. to 7.	Compliant																			

	6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.				
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	As above	As above	Compliant	
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.		Refer R1.1 - TFI prepared the requisite Annual Returns Refer R1.1 - TFI prepared the requisite Annual Returns	Not triggered	
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Interview: L Udage Arachchige	License not surrendered or revoked	Not triggered	
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	EPL Annual Returns - 2023/2024, 2024/2025	TFI have submitted Annual Returns during the audit period.	Compliant	
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	As above	The above Annual Returns were made available to the auditor.	Compliant	
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	As above	The TFI Annual Returns, as sighted by the auditor, comply with this requirement.	Compliant	
R1.8	The licensee must supply with the Annual Return the most recent Annual Review Report required by Condition D7 of project approval SSD-7268 that provides: a) tabulated results of all monitoring data; b) graphical presentation of all monitoring data collected over the current and previous reporting periods in order to show variability and/or trends overtime; c) an analysis and interpretation of all monitoring data; and d) actions to correct identified adverse trends.	As above	The TFI Annual Returns and Annual Review reports address the requirements of this condition.	Not triggered	
R2 Notification of environmental harm					
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555 Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.	Interview: L Udage Arachchige, A Manning	No notifications required during the reporting period, or since the re-commencement of operation of the site.	Not triggered	

R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.	As above	As above	Not triggered	
R3 Written report					
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.	Interview: L Udage Arachchige, A Manning NSW EPA letter (DOC23/129140), 27 February 2023	Refer condition D8 above. The NSW EPA reviewed two public notifications during the reporting period which required the provision of written reports. The NSW EPA accepted the reports and found no further grounds for action.	Compliant	
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Interview - L Udage Arachchige, A. Manning	The licensee cooperated with the NSW EPA investigations discussed above.	Compliant	
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Interview - L Udage Arachchige, A. Manning	No report was requested.	Not triggered	
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Interview - L Udage Arachchige	No such requests have been made.	Compliant	
7. General conditions					
G1 Copy of licence kept at the premise or plant					
G1.1	A copy of this licence must be kept at the premises to which the licence applies	Site Inspection	The EPL is held at the premises.	Compliant	
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it	Noted	No request made to TFI to see EPL.	Not triggered	
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises	Interview: L Udage Arachchige	Refer R3.2	Compliant	
G2 Contact number for incidents and responsible employees					
G2.1	The licensee must provide the EPA with up to date contact details to enable the EPA: a) to contact either the licensee or a representative of the licensee who can respond at all times to incidents relating to the premises; and b) to contact the licensee's senior employees or agents authorised at all times to: i) speak on behalf of the licensee, and ii) provide any information or document required under licence.	NSW EPA E-Connect	Up to date details for TFI key site contacts are provided in E-Connect as sighted by the auditor on screen.	Compliant	

G2.2	The contact details required by Condition G2.1 above must include: a) the full name and title of the authorised representatives and the scope of their respective authorisations; and b) the direct telephone number, mobile number, pager number, fax number, email address and postal address for contacting each authorised representative.	As above	Full names, scope of authorisation (e-Connect EPA-Supervisor) and email addresses are provided.	Compliant									
G2.3	The licensee is to inform the EPA in writing of the appointment of any subsequent contact persons, or changes to the person's contact details as soon as practicable and in any event within fourteen days of the appointment or change.	As above Noted	No changes to current authorised personnel	Compliant									
G3	Signage												
G3.1	The location of EPA points numbered 1 (Meteorological Station), 3 (Sediment Dam), 4 (Groundwater monitoring), 5 (Groundwater monitoring), 6 (Effluent discharge), 7 to 14 (Soil monitoring) and 15 (Manure compost pad) must be clearly marked by signs that indicate the point identification number used in this licence and that are located as close as practical to the point.	Sight Inspection	Monitoring points were observed to be clearly signposted	Compliant									
8. Pollution studies and reduction programs													
U1	Installation of environmental protection works and effluent commissioning study - Pollution control measures												
U1.1	The licensee must undertake the following works as agreed with the EPA and in line with Development <table><tr><th>Site feature</th><th>Works to be undertaken</th></tr><tr><td>Manure stockpile area</td><td>a) Designed and constructed in accordance with the leachate barrier system in Section 5.2 of the DEC (2004) Environmental Guidelines: Composting and related organics processing facilities</td></tr><tr><td>Biosecurity</td><td>b) Revise the Emergency Disposal and Biosecurity Protocol detailing the procedures for a biosecurity emergency including a mass mortality event as required under Condition C14 in Development Consent SSD-7268-Mud-2</td></tr></table>	Site feature	Works to be undertaken	Manure stockpile area	a) Designed and constructed in accordance with the leachate barrier system in Section 5.2 of the DEC (2004) Environmental Guidelines: Composting and related organics processing facilities	Biosecurity	b) Revise the Emergency Disposal and Biosecurity Protocol detailing the procedures for a biosecurity emergency including a mass mortality event as required under Condition C14 in Development Consent SSD-7268-Mud-2	Site Inspection Interview: L Udage Arachchige OEMP - EDBP	The former proposed manure stockpile area was removed by the MOD 2 Development Approval. Manure is now temporarily stored in a steel skip bin prior to land application in the Irrigation Area (usually on the same day). The EDBP has been updated and approved for implementation.	Compliant			
Site feature	Works to be undertaken												
Manure stockpile area	a) Designed and constructed in accordance with the leachate barrier system in Section 5.2 of the DEC (2004) Environmental Guidelines: Composting and related organics processing facilities												
Biosecurity	b) Revise the Emergency Disposal and Biosecurity Protocol detailing the procedures for a biosecurity emergency including a mass mortality event as required under Condition C14 in Development Consent SSD-7268-Mud-2												
U1.2	The licensee must submit a report including photographs documenting the completion of the works required by Condition U1.1 to the EPA prior to undertaking slaughtering activities.	As above	As above	Not triggered									
U1.3	The licensee must undertake the installation of the works identified in the table below prior to treated effluent being applied to the irrigation utilisation area. <table><tr><th>Site feature</th><th>Works to be undertaken</th></tr><tr><td>Irrigation system</td><td>a) Install irrigator, pump stations and irrigation main</td></tr><tr><td>Surface water bunds</td><td>b) Construct clean water diversion bunds and tailwater catch drains around the entire perimeter of the effluent reuse area</td></tr><tr><td>Tailwater pond</td><td>c) Construct tailwater collection basin</td></tr></table>	Site feature	Works to be undertaken	Irrigation system	a) Install irrigator, pump stations and irrigation main	Surface water bunds	b) Construct clean water diversion bunds and tailwater catch drains around the entire perimeter of the effluent reuse area	Tailwater pond	c) Construct tailwater collection basin	Site Inspection Interview: L Udage Arachchige, A Manning	The main irrigation areas was developed at the time of the audit site inspection. It included pivot irrigation within the defined irrigation zone along diversion bunds and drains and tailwater collection.	Compliant	
Site feature	Works to be undertaken												
Irrigation system	a) Install irrigator, pump stations and irrigation main												
Surface water bunds	b) Construct clean water diversion bunds and tailwater catch drains around the entire perimeter of the effluent reuse area												
Tailwater pond	c) Construct tailwater collection basin												
U1.4	The licensee must submit a report including photographs documenting the completion of the works required by Condition U1.3 to the EPA prior to treated effluent being applied to the irrigation utilisation area.	As above	Deemed non-compliant in the previous 2023 audit. No evidence of a report has been sighted by the auditor, including photographs documenting the completion of the works. However, the system has been audited and the EPA has also inspected the system since completion. As such the auditor considers that the requirement of the report is no longer necessary.	Not triggered									
Effluent system commissioning study													

U1.5	Prior to the plant re-commencing operations the licensee must provide the EPA with a status update advising estimated timing for sufficient treatable effluent to commission the effluent management and related irrigation system.	OEMP WWMP IMP Effluent System Commissioning Plan, version 3.0, February 2023	The Effluent System Commissioning Plan provided estimated timeframes for the full commissioning period - approximately 8 to 12 months period. The Plan was provided to the NSW EPA prior submission to the Planning Secretary for approval.	Compliant	
U1.6	No more than 30 days after commissioning of the effluent treatment and irrigation system, the licensee must provide the EPA with a report summarising the outcomes of commissioning against expected results, including but not limited to: a) comparisons between the predicted effluent quality and quantity and actual measured effluent quality and quantity, and b) any actions needed to ensure that the system adequately treats effluent and that the irrigation area sustainably utilises the effluent. If there is a significant difference between predicted and measured results, the licensee must provide updated nutrient, salt and water balance models and must also demonstrate that the size of the effluent irrigation area is appropriate.	Interview: L Udage Arachchige, A Manning	No commissioning report has been sighted by the auditor. The system was constructed and commissioned in accordance with the Effluent System Commissioning Plan. The system has been audited and the EPA has also inspected the system since completion. As such, the auditor considers that the requirement of the report on commissioning outcomes is no longer necessary. Ongoing monitoring is being undertaken to monitor the measured effluent quality and quantity and the performance of pond system and the irrigation area. As above The above stated ongoing monitoring program should assess the adequacy of the system to treat the effluent and that the irrigation area sustainably utilises the effluent. As previously noted, no cropping activities have been undertaken in the irrigation area. As the throughput of the abattoir continues to increase it will be necessary to achieve the intent of this requirement.	Not triggered	
Notification of recommending on-site operations					
U1.7	The licensee must inform the EPA of recommending the undertaking scheduled activity of livestock processing activities at the premises within seven days of recommending on-site operations.	MS Outlook Calendar Meeting - 24 May 2023 (Bourke Abattoir attended by EPA)	Deemed complaint in the previous 2023 audit.	Compliant	

Appendix B - Planning Secretary Audit Team Agreement

Appendix C - Consultation

From: [Will Weir](#)
To: [DPE PSYC Compliance Mailbox](#)
Cc: [Nicola Smith](#)
Subject: FW: Thomas Food Internation - Bourke Small Livestock Abattoir DPE
Date: Wednesday, 29 April 2026 1:11:00 PM

Good afternoon,

I will soon be leading and undertaking the Independent Environmental Audit for the Thomas Food Internation - Bourke Small Livestock Abattoir, SSD- 7268 Mod 5. I will be undertaking audit during May 2026, and an inspection of the site will be carried out this 20 May 2026. I apologise for the late notice which is due to the timing of contractual engagement of our audit services.

In accordance with the DPHI Independent Audit Post Approval Requirements (2026), I am engaging with Council to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the operational audit scope.

Thank you,

Will Weir | National Discipline Lead - Risk & Compliance

T +61 7 4672 6145 **M** +61 427 707 803



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From: [Will Weir](#)
To: ["info@epa.nsw.gov.au"](mailto:info@epa.nsw.gov.au)
Cc: [Nicola Smith](#)
Subject: FW: Thomas Food Internation - Bourke Small Livestock Abattoir EPA
Date: Wednesday, 29 April 2026 1:08:00 PM

Good afternoon,

I will soon be leading and undertaking the Independent Environmental Audit for the Thomas Food Internation - Bourke Small Livestock Abattoir, SSD- 7268 Mod 5. I will be undertaking audit during May 2026, and an inspection of the site will be carried out this 20 May 2026. I apologise for the late notice which is due to the timing of contractual engagement of our audit services.

In accordance with the DPHI Independent Audit Post Approval Requirements (2026), I am engaging with the NSW EPA to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the operational audit scope.

Thank you,

Will Weir | National Discipline Lead - Risk & Compliance

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From: Will Weir
Sent: Wednesday, 29 April 2026 1:07 PM
To: bourkeshire@bourke.nsw.gov.au
Cc: Nicola Smith <Nicola.Smith@fyfe.com.au>
Subject: Thomas Food Internation - Bourke Small Livestock Abattoir

Good afternoon,

I will soon be leading and undertaking the Independent Environmental Audit for the Thomas Food Internation - Bourke Small Livestock Abattoir, SSD- 7268 Mod 5. I will be undertaking audit during May 2026, and an inspection of the site will be carried out this 20 May 2026. I apologise for the late notice which is due to the timing of contractual engagement of our audit services.

In accordance with the DPHI Independent Audit Post Approval Requirements (2026), I am engaging with Council to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the operational audit scope.

Thank you,

Will Weir | National Discipline Lead - Risk & Compliance

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From: [Will Weir](#)
To: ["development.tfnsw@transport.nsw.gov.au"](mailto:development.tfnsw@transport.nsw.gov.au)
Cc: [Nicola Smith](#)
Subject: FW: Thomas Food Internation - Bourke Small Livestock Abattoir TfNSW
Date: Wednesday, 29 April 2026 2:07:00 PM

Good afternoon,

I will soon be leading and undertaking the Independent Environmental Audit for the Thomas Food Internation - Bourke Small Livestock Abattoir, SSD- 7268 Mod 5. I will be undertaking audit during May 2026, and an inspection of the site will be carried out this 20 May 2026. I apologise for the late notice which is due to the timing of contractual engagement of our audit services.

In accordance with the DPHI Independent Audit Post Approval Requirements (2026), I am engaging with TfNSW to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the operational audit scope.

Thank you,

Will Weir | National Discipline Lead - Risk & Compliance

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From: [Will Weir](#)
To: bourkeshire@bourke.nsw.gov.au
Cc: [Nicola Smith](#)
Subject: Thomas Food Internation - Bourke Small Livestock Abattoir BSC
Date: Wednesday, 29 April 2026 1:06:00 PM

Good afternoon,

I will soon be leading and undertaking the Independent Environmental Audit for the Thomas Food Internation - Bourke Small Livestock Abattoir, SSD- 7268 Mod 5. I will be undertaking audit during May 2026, and an inspection of the site will be carried out this 20 May 2026. I apologise for the late notice which is due to the timing of contractual engagement of our audit services.

In accordance with the DPHI Independent Audit Post Approval Requirements (2026), I am engaging with Council to provide input into the audit scope.

Please respond to this email address if you have any specific areas of concern that you would like addressed as part of the operational audit scope.

Thank you,

Will Weir | National Discipline Lead - Risk & Compliance

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Appendix D Independent Auditor Declaration Form

Project Name	Bourke Small Stock Abattoir
Consent No.	SSD 6422
Description of Project	Operation Small Stock Abattoir
Project Address	1703 Mitchell Highway, North Bourke, NSW 2840
Proponent	Thomas Food International
Title of Audit	260112 - Independent Environmental Audit Report Bourke Small Stock Abattoir – SSD 7268, EPL 90218 June 2026
Date	10/08/2026

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Post Approval Requirements (Department 2019)*;
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the Project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited Project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited Project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the Project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

a) Under section 10.6 of the *Environmental Planning and Assessment Act 1979* a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved Project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and

b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).

Name of Auditor	Will Weir
Signature	
Qualification	BEng (Environmental) Honours
Company	NGH (a FYFE Pty Ltd company)
Company Address	Unit 17, Level 3, 21 Mary Street, Surry Hills NSW 2010

Appendix E - Site Inspection Photographs



Diversion drain and bund on perimeter of irrigation area



Dominant vegetation on irrigation area



Sign posted groundwater monitoring bore location



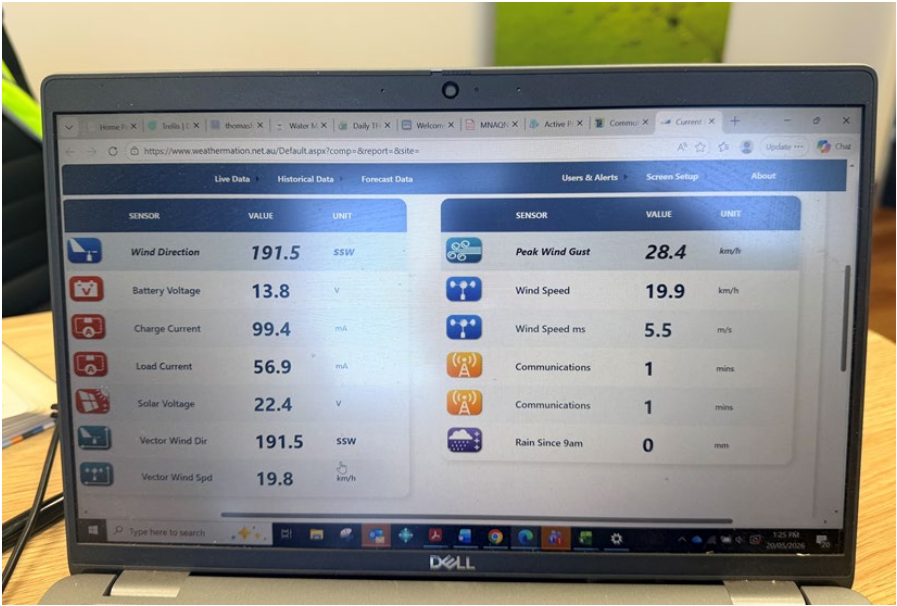
Effluent discharge Point 6 monitoring location



Metal recycling activity in laydown yard



Meteorological Station



Live meteorological data



Early earthworks for ne Skin Shed



Class 3 Gas storage with combustible on top, no placard, Lithium-ion battery powered compressor out front, and insufficient segregation from Class 3 Flammable Liquids.



Class 3 Flammable Liquid and Class Corrosive stored together without segregation in the Main Chemical Store room. No placard on door.

NGH a FYFE Company

NSW • ACT • QLD • VIC

ABN 31 124 444 622 ACN 124 444 622

E: ngh@nghconsulting.com.au

GOLD COAST

2B 34 Tallebudgera Creek Road
Burleigh Heads QLD 4220

T. (07) 3129 7633

SYDNEY REGION

Unit 17, 21 Mary Street
Surry Hills NSW 2010

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BEGA

Suite 11, 89-91 Auckland Street
(PO Box 470)
Bega NSW 2550

T. (02) 6492 8333

MELBOURNE

Level 14, 10-16 Queen Street
Melbourne VIC 3000

T: (03) 7031 9123

TOWNSVILLE

Level 4, 67-75 Denham Street
Townsville QLD 4810

T. (07) 4410 9000

BRISBANE

T3, Level 7, 348 Edward Street
Brisbane QLD 4000

T. (07) 3129 7633

NEWCASTLE - HUNTER & NORTH COAST

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Hamilton NSW 2303

T. (02) 4929 2301

WAGGA WAGGA - RIVERINA & WESTERN NSW

35 Kincaid Street (PO Box 5464)
Wagga Wagga NSW 2650

T. (02) 6971 9696

CANBERRA

Unit 8, 27 Yallourn Street
(PO Box 62)
Fyshwick ACT 2609

T. (02) 6280 5053

SUNSHINE COAST

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Sippy Downs QLD 4556

T: 13 54 93

WODONGA

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