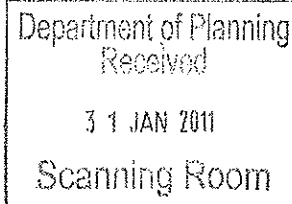


Our reference: : DOC11/4197 & LIC07/2464-03
Contact: : Rod Fox 9995 6839



Mr C Ritchie
Manager – Industry
Mining & Industry Projects
Department of Planning
GPO Box 39
SYDNEY NSW 2001



Dear Mr Ritchie

Re: Request for Details of Key Issues and Assessment Requirements ABC Paper & Paper Mill Expansion Project, Environment Protection Licence No. 12530

I refer to your request for the Department of Environment Climate Change and Water (DECCW) requirements for the environmental assessment (EA) in regard to the above proposal received by DECCW on 18 January 2011.

In summary, the DECCW's information requirements for the proposal relate to a complete assessment and review of:

Air

Air emissions primarily pollutants such as: Nitrogen Oxides, Dust, and Odour from the process need to be assessed. An Air Quality Impact Assessment (AQIA) must be completed in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW 2005*. The ground level criteria at sensitive receptors and at the boundary of the premises need to be applied. Further to this, the assessment must be undertaken with consideration of a number of different operating scenarios from normal operation conditions to worse case. All proposed plant and equipment must meet the *Protection of the Environment Operations (Clean Air) Regulation 2010*.

Noise

A Noise Impact Assessment (NIA) must be undertaken strictly in accordance with the *NSW Industrial Noise Policy 2000*. The NIA must consider the noise generated by the proposed plant and whether there will be a reduction in noise from the site as a whole.

Stormwater

Detailed stormwater management plans must be provided that address stormwater management issues for both the construction and operation phase of the development.

Detailed spill management procedures must be developed and outline for the loading and unloading of chemicals and fuel at the site. Bunding details must be provided for all loading, unloading areas and chemical and fuel storage areas. It should be noted that all loading and unloading and fuel storage areas should be bunded and roofed.

The Department of Environment and Climate Change is now known as the Department of Environment, Climate Change and Water

PO Box 668 Parramatta NSW 2124
Level 7, 79 George Street Parramatta NSW
Tel: (02) 9995 5000 Fax: (02) 9995 6900
ABN 30 841 387 271
www.environment.nsw.gov.au

Department of **Environment and Climate Change** NSW



Waste

Storage handling of waste generated as a result of the demolition and construction works as well as the operations of the new plant must be reviewed. Waste must be classified and quantified in accordance with the DECCW *Waste Classification Guidelines December 2009*.

Aboriginal Cultural Heritage

An assessment of Aboriginal Cultural Heritage may be required as part of the EA preparation, if applicable.

Flora and Fauna

A flora and fauna survey is required as part of an EA, if applicable. If the proposal is likely to have a significant impact on threatened species or their habitats, a Species Impact Assessment (SIA) must be prepared in accordance with the requirements of the DECCW.

If, after considering the SIA, the consent authority intends to grant approval to the proposal that will have significant impact on the threatened species and their habitats, then concurrence of the DECCW will be required. If the Minister for Planning is the consent authority the concurrence of the DECCW is not required, but consultation must occur with the Minister for the Environment before development consent is granted.

Greenhouse

A comprehensive assessment of and report on the project's predicted greenhouse gas emissions (tCO₂e) and reduction of waste energy.

Environment Protection Licence

As the proponent holds an existing Environment Protection Licence (EPL) the proponent will need to make a separate application to DECCW to vary their EPL to incorporate the conditions of the development consent if planning project approval is given.

The proponent should be aware that any commitments made in the EA may be formalised as approval conditions. Consequently pollution control or conservation measures should not be proposed if they are impractical, unrealistic or beyond the financial viability of the development. It is important that all conclusions are supported by adequate data.

DECCW requests that five (5) copies of the EA are provided for assessment. These documents should be lodged with DECCW's Manager Sydney Industry at PO Box 668, Parramatta NSW 2124.

If you have any queries regarding this matter please contact Rod Fox on 9995 6839.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Stuart Clark', followed by the date '29/1/11'.

STUART CLARK
Acting Unit Head Sydney Industry
Environment Protection and Regulation Division

ATTACHMENT 1

DECCW's Environment Assessment Requirements

Environmental impacts of the project

1. The following environmental impacts of the project need to be assessed, quantified and reported on:
 - Air quality
 - Noise and vibration
 - Water
 - Waste and chemicals
 - Soil contamination
 - Cumulative impacts

2. These should be assessed in accordance with the relevant guidelines listed in the preceding cover letter, namely:
 - *Protection of the Environment Operations (Clean Air) Regulation 2010*, and the ground level concentrations in the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW 2005*.
 - *NSW Industrial Noise Policy 2000*.
 - *Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation – July 2005*. This guideline identifies the important factors and/or heads of consideration that need to be considered by proponents and consultants when assessing potential impacts on Aboriginal cultural heritage for development applications assessed under Part 3A of the EPA Act 1079.

Please note that DECCW advises that reference to the Interim Community Consultation Guidelines within the guideline is out of date and you are advised to reference the *Aboriginal cultural heritage consultation requirements for proponents 2010*. The guideline <http://www.environment.nsw.gov.au/resources/cultureheritage/commconsultation/09781ACHconsultreq.pdf>
 - *DECCW Waste Classification Guidelines December 2009*.

3. Describe mitigation and management options that will be used to prevent, control, abate or minimise identified environmental impacts associated with the project and to reduce risks to human health and prevent the degradation of the environment. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.

Impacts on threatened species and their habitat

1. Likely impacts on threatened species and their habitat need to be assessed, evaluated and reported on.
2. Describe the actions that will be taken to avoid or mitigate impacts or compensate for unavoidable impacts of the project on threatened species and their habitat. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.
3. The EA needs to clearly state whether it meets each of the key thresholds set out in Step 5 of the guideline.

Impacts on Aboriginal cultural heritage values

1. The EA should address and document the information requirements set out in *Guidelines for Aboriginal Cultural Heritage Impact Assessment and Community Consultation – July 2005* involving surveys and consultation with the Aboriginal community.
2. Identify the nature and extent of impacts on Aboriginal cultural heritage values across the project area.
3. Describe the actions that will be taken to avoid or mitigate impacts or compensate to prevent unavoidable impacts of the project on Aboriginal cultural heritage values. This should include an assessment of the effectiveness and reliability of the measures and any residual impacts after these measures are implemented.
4. The EA needs to clearly demonstrate that effective community consultation with Aboriginal communities has been undertaken in determining and assessing impacts, developing options and making final recommendations.

In reply please quote: qA134568

Contact: Andrew Mooney on 9725 0214

28 January 2011

Chris Ritchie
Manager - Mining and Industry Projects
Dept of Planning
GPO Box 39
Sydney 2001

Dear Mr Ritchie

**REQUEST FOR DETAILS OF KEY ISSUES AND ASSESSMENT
REQUIREMENTS - ABC PAPER AND PAPER MILL EXPANSION PROJECT**

I refer to your letter dated 14 January 2011 regarding the above matter. It is noted that the letter and supporting information did not provide any property or address details relating to the proposed site.

ABC Paper own several different properties in the area and following further enquiry's with the applicant it is Council's understanding that your current request for Key Issues and Assessment Requirements relates to their premises at 63-75 Redfern St, Wetherill Park.

In addition to the above, very limited details and information have been provided to Council regarding the proposal, with the 'preliminary environmental assessment' (PEA) amounting to a cover letter providing scant information about the project prepared by the proponents planning consultant. From Council's experience with other Part 3A applications the PEA for the proposal would appear extremely deficient in terms of background information and detail appropriate to a PEA.

In this regard, the following advice is based on the limited information that has been made available to Council and relates to the ABC Paper premises at 63-75 Redfern St, Wetherill Park. It is noted that this site was subject to Council's approval of DA 234/2008 (August 2008) and recent modification (granted 20 Dec 2010) for construction of a warehouse and factory building with associated truck marshalling/loading area and car parking on the site.

Key Issues and Assessment Requirements:

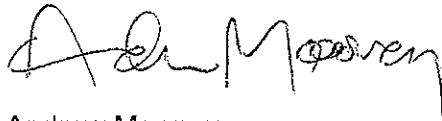
1. The proposal needs to clarify the relationship with and impact on previous development approvals (including any modifications to consent) issued by Fairfield City Council for the site including the construction of warehouse and factory buildings with associated truck marshalling/loading areas.

28 January 2011

2. The proposal needs to demonstrate consistency and compliance with relevant provisions of Fairfield LEP 1994 and Fairfield City Wide DCP (in particular Chp.9 – Industrial Development, Chp.11 – Flood Risk Management, Chp.12 – Car Parking).
3. Demonstrate consistency with relevant SEPPs including the deemed SEPP for the Georges River Catchment
4. Provide details in relation to stormwater management and drainage for the site.
5. Measures to manage and mitigate impacts in relation to;
 - a. Noise
 - b. Air quality
 - c. Waste Generation
 - d. Environmental Hazards
 - e. Dangerous Goods Storage

Please contact the undersigned if you have any further enquires regarding the above.

Yours sincerely



Andrew Mooney
Senior Strategic Planner