

29<sup>th</sup> October 2024

Department of Planning Housing and Infrastructure  
[compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

**Re: Response to Audit Findings - KPMG - 2024 Independent Environmental Audit Redirect St Mary's – SSD 10474**

This letter has been prepared by Redirect Recycling Pty Ltd (reDirect) in response to the audit findings outlined within *Independent Audit No. 1 St Marys Resource Recovery Facility*, dated 23 October 2024 (ref: SMRRF\_IEA-01) (KPMG, 2024) (carried out in accordance with C13 of SSD-10474) and to satisfy C8 and C14 of the SSD-10474 Development Consent.

*“C8. The Planning Secretary must be notified in writing via the Major Projects website within seven days after the Applicant becomes aware of any non-compliance.”*

*“C14. In accordance with the specific requirements in the Independent Audit Post Approval Requirements (Department 2020), the Applicant must:*

- a) review and respond to each Independent Audit Report prepared under condition C13 of this consent;*
- b) submit the response to the Planning Secretary and any other NSW agency that requests it, together with a timetable for the implementation of the recommendations;*
- c) implement the recommendations to the satisfaction of the Planning Secretary; and*
- d) make each Independent Audit Report and response to it publicly available no later than 60 days after submission to the Planning Secretary and notify the Planning Secretary in writing at least 7 days before this is done.”*

A copy of the KPMG (2024) *Audit Summary* has been provided below (refer to *Appendix I - Audit Summary: Response to KPMG [2024] Audit Findings*), with corresponding responses, actions and timeframes to each of the recommendations submitted for review by the Department of Planning Housing and Infrastructure.

A copy of the audit report (KPMG, 2024) and this letter will be uploaded to the reDirect website 7 days after the submission date (29.10.2024).

Should the Department of Planning Housing and Infrastructure require any further clarification regarding the information provided herein, or any additional information, please contact me the undersigned.

Regards,



James Sutton  
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## Appendix I – Audit Summary: Response to KPMG (2024) Audit Findings

**Table 1 Audit Summary: Response to KPMG (2024) Audit Findings**

Reference	Requirement Details	Finding Details	Status	Redirect Response
Non-compliance SMRRF-01_NC-1	<p><b>A2 Terms of Consent</b></p> <p>The development may only be carried out:</p> <p>a) in compliance with the conditions of this consent</p>	<p>Considering the non-compliances raised against CoA A7, A22, A23, B16 and C8, this triggers an additional non-compliance against CoA A2.</p> <p><b>Recommendation:</b> Nil</p>	Closed	Noted
Self-reported Non-compliance. SMRRF-01_NC-2	<p><b>A7 Waste</b></p> <p>The Applicant must not store more than 704 tonnes of general solid waste (non-putrescible) at any one time.</p>	<p>In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA A7. The non-compliance was self-reported by ReDirect.</p> <p><b>Recommendation:</b> ReDirect should review their internal planning processes to ensure that repeat non-compliances to not occur in future periods when their receiving facility reduces their intakes over holiday periods etc.</p> <p><b>Additional Information provided to Auditor post audit:</b></p> <p><i>Since the non-compliance occurred, ReDirect has increased its fleet of prime movers and walking floor trailers from 16 to 24. This allows increased capacity to manage and process wood product during periods of increased demand.</i></p> <p><i>Additionally, ReDirect will provide notification to all customers notifying them of its shut down period and</i></p>	Closed	Noted

Reference	Requirement Details	Finding Details	Status	Redirect Response
		<i>requesting notification of any large quantities intended to be received prior to the shut down period.</i>		
Non-compliance SMRRF-01_NC-3	<p><b>A22 Easements</b></p> <p>Within six months of the commencement of operation of the development, an easement , or an alternative arrangement as agreed by the Planning Secretary, under section 88A and/or restriction or public positive covenant under section 88E of the Conveyancing Act 1919 naming the Council as the prescribed authority, which can only be revoked, varied or modified with the consent of the Council, and which provides for access at the driveway to 21 Dunheved Circuit for vehicles entering and exiting the site must be registered on title of Lot 9 DP 31908.</p>	<p>The registered plans for Lot 9 DP 31908 depict the newly created easement which provides shared access to 21 and 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise</p> <p><b>Recommendation:</b> Nil</p>	Closed	Noted
Non-compliance	<p><b>A23 Easements</b></p> <p>Within six months of the commencement of operation of the</p>	<p>Review of the plan of subdivision for of Lot 143 DP1307832 and Lot 9 DP31908 confirms that the boundary had been adjusted so that all on site detention tanks are located within</p>	Closed	Noted

Reference	Requirement Details	Finding Details	Status	Redirect Response
SMRRF-01_NC-4	development, a boundary adjustment between the site (Lot 143 DP 1013185) and Lot 9 DP 31908, or an alternative arrangement as agreed by the Planning Secretary, is to be undertaken so that all on-site detention tanks servicing the site located on Lot 9 DP 31908, are located on the site.	the boundary of 25 Dunheved Circuit. The plans were registered on 19 August 2024, which exceeds the six-month timeframe set out in the condition. The Auditor sighted email correspondence from ReDirect to land surveyor 'VMS Survey' on 26 September 2023 commencing the boundary adjustment process. The Auditor understands that the process took longer than anticipated to finalise.  <b>Recommendation:</b> Nil		
Self-reported Non-compliance. SMRRF-01_NC-5	<b>B16 Stormwater Management System</b> Prior to the commencement of operation of the development, the existing rainwater tank on site is to be replaced or supplemented with an additional tank in order to meet Council's water conservation requirements, to the satisfaction of Council. The tank(s) are to be designed and managed in accordance with the Australian Guidelines for Water Recycling Stormwater Harvesting and Reuse, July 2009.	Council was not consulted with prior to operations regarding the replacement rainwater tank required by CoA B16.  <b>Recommendation</b> ReDirect should implement the actions outlined in the non-compliance notification letter, dated 27 August 2024.	Open	reDirect are currently executing actions outlined in the non-compliance notification letter, dated 27 August 2024. Penrith City Council have requested further information (latest correspondence 11 September 2024). reDirect's stormwater engineer is currently preparing new modelling and additional information for council's consideration with a follow up submission planned within the next two weeks. Timeframe to close out the action is expected to be 1-2 months and is dependent on Council responses and installation requirements of a new rain water tank.
Self-reported Non-compliance.	<b>C8 Non-Compliance Notification</b> The Planning Secretary must be notified in writing via the Major Projects website	In December 2023 ReDirect stored 762.47 tonnes of waste at the site, exceeding the 704 tonne limit established by CoA	Closed	Noted

Reference	Requirement Details	Finding Details	Status	Redirect Response
SMRRF-01_NC-6	within seven days after the Applicant becomes aware of any non-compliance.	<p>A7. ReDirect became aware of the non-compliance on 21 February 2024 and self-reported to DPPI on 3 April 2024.</p> <p>DPPI were not notified within 7-days of becoming aware that the non-compliance against CoA A7 had occurred.</p> <p><b>Recommendation:</b> Ensure that DPPI are notified within 7 days of becoming aware of any future non-compliances (including those identified in this IEA report).</p>		
<p>Opportunity for Improvement</p> <p>SMRRC-01_OFI-1</p>	<p><b>B2 Operating Conditions</b></p> <p>The Applicant must ensure:</p> <p>(o) that the mitigation measures proposed in the memorandum prepared by The Transport Planning Partnership and dated 3 September 2021, included in the Supplementary Information, are installed prior to commencement of operations.</p>	<p>The mitigation measures outlined in The Transport Planning Partnership memorandum include the provision of staff induction training and implementation of a Driver Code of Conduct that is to be read and signed by internal and external truck drivers.</p> <p>ReDirect have developed a Driver Code of Conduct as part of the Operational Traffic Management Plan and provided details of staff training and 15 separate completed Driver Code of Conduct declarations for internal staff. Due to the extensive network of external truck drivers delivering product to the site, the Auditor was advised that it has not been feasible for ReDirect to obtain signed declarations from each external operator.</p> <p><b>Recommendation:</b> Consider implementing a method of educating external operators of site-specific traffic management requirements such as a generic email to all</p>	Open	Noted

Reference	Requirement Details	Finding Details	Status	Redirect Response
		registered providers including the Driver Code of Conduct for their acknowledgement.		
<p>Opportunity for Improvement</p> <p>SMRRC-01_OFI-2</p>	<p><b>C4 OPERATIONAL ENVIRONMENTAL MANAGEMENT PLAN</b></p> <p>The Applicant must:</p> <p>b) operate the development in accordance with the OEMP approved by the Planning Secretary (and as revised and approved by the Planning Secretary from time to time).</p>	<p>ReDirect implement a daily environmental checklist which includes assessment of the effectiveness of several environmental mitigation measures required to be implemented under the OEMP and sub-plans. The Auditor considers that the daily checklist is a valuable tool for minimising environmental impact and maintaining compliance to the conditions of consent.</p> <p><b>Recommendation:</b> There is an opportunity to review the daily checklist to ensure that it is providing value and capturing all key mitigation measures and reflects any changes or lessons learnt from the previous ~11 months of implementation. An example of an improvement is to add the truck wheel wash to the checklist.</p>	Open	<p>Noted – All management plans will be reviewed following assessment of the Independent Environmental Audit. reDirect will consider the OFI upon review of the OEMP and sub-plans.</p>