Environmental Assessment Report

CMTP Pty Ltd

Branxholm Sawmill Upgrade and Intensification

1628 Warrentinna Road, Branxholm

October 2024

EPA TASMANIA

ENVIRONMENT PROTECTION AUTHORITY

Environmental Assessment Report

Proponent	**CMTP Pty Ltd**
Proposal	Branxholm Sawmill Upgrade and Intensification
Location	1628 Warrentinna Road, Branxholm
Class of Assessment	2A
PCE No.	11324
Permit Application No.	DA PLA/2022/125 Dorset Council
myDAS Folder No.	22/8016
myDAS Document No.	22/8016.015

Assessment Process Milestones

Date	Milestone
15 August 2022	Permit application submitted to Council
15 September 2022	Referral received by the Board
28 September 2022	Class of assessment determined by delegate of the Board
19 October 2022	Guidelines issued
21 June 2024	Case for assessment accepted by delegate of the Board
29 June 2024	Start of public consultation period
14 July 2024	End of public consultation period
20 August 2024	Date of additional information (Supplement) request
9 September 2024	Additional information (Supplement) submitted to the Board
17 September 2024	Date draft conditions issued to proponent
1 October 2024	Statutory period for assessment ends

Glossary/Acronyms

Term	Detail
Board	Board of the Environment Protection Authority
CEMP	Construction Environmental Management Plan
CMTP	CMTP Pty Ltd
EER	Environmental Effects Report
EGWP	Environmental Guidelines for Wood Processing
EIA	Environmental impact assessment
EMPCA	*Environmental Management and Pollution Control Act 1994*
EMPCS	Environmental management and pollution control system
EPBCA	*Environment Protection and Biodiversity Conservation Act 1999* (Cth)
LUPAA	*Land Use Planning and Approvals Act 1993*
NOI	Notice of Intent
NRE Tas	Department of Natural Resources and Environment Tasmania
RMPS	Resource Management and Planning System of Tasmania
SD	Sustainable development
TSPA	*Threatened Species Protection Act 1995*

Report Summary

This report provides an environmental assessment of the proposed upgrade and intensification at the Branxholm Sawmill by CMTP Pty Ltd (**CMTP**).

The proposal involves an increase production at the Branxholm Sawmill from 20,000m^3 to 50,000m^3 per annum and associated building works, including construction of a new building to house a new profiling gang sawmill line, and a replacement band saw, chip screen, and chip bin, as well as modification to sorting and stacking systems. While the proposal would allow for up to 50,000m^3 per year, CMTP expects a maximum annual output of no more than 47,600m^3 based on log supply. There are no proposed changes to operating hours.

This report has been prepared based on information provided in the permit application, Environmental Effects Report (**EER**) and Supplement to the EER (**Supplement**). Relevant government agencies and the public were consulted, and their submissions considered as part of the assessment.

Appendix 1 contains details of matters raised by the referral agencies during the consultation process.

Appendix 2 contains a table of the proponent's proposed management measures.

Appendix 3 contains the environmental permit conditions for the proposal.

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1. Approval Process

An application for a permit under the *Land Use Planning and Approvals Act 1993* (**LUPAA**) in relation to the proposal was submitted to Dorset Council on 15 August 2022.

This proposal is defined as a 'level 2 activity' under clause 2(g), Schedule 2 of the *Environmental Management and Pollution Control Act 1994* (**EMPCA**), being a wood processing works with a total production of 1,000m^3 or more per year. The proposal also produces woodchips and is therefore also a 'level 2 activity' under clause 2(i), Schedule 2 of EMPCA as it involves the processing of trees or parts of trees to form woodchips with a production capacity of 1,000 tonnes or more per year.

Section 25(1) of EMPCA required Council to refer the application to the Board of the Environment Protection Authority (**the Board**) for assessment. The application was received by the Board on 15 September 2022.

The Board required that information to support the proposal be provided in the form of an EER prepared in accordance with the Guidelines issued by the Board on 19 October 2022. Several drafts of the EER were submitted to EPA for review against the Guidelines prior to finalisation and acceptance on behalf of the Board on 21 June 2024.

The EER was released for public inspection for a 14-day period commencing on 29 June 2024. Advertisements were placed in The Examiner and on the EPA website. The EER was also referred to relevant government agencies for comment. No representations were received from the public however, one representation was received from a relevant government agency.

On 20 August 2024, the Executive Director, Environmental Assessments requested that the proponent submit additional information. Satisfactory additional information, in the form of a Supplement to the EER, was submitted by the proponent on 9 September 2024.

2. SD Objectives and EIA Principles

The proposal must be considered by the Board in the context of the objectives of the Resource Management and Planning System of Tasmania (**RMPS**), and the Environmental Management and Pollution Control System (**EMPCS**). Both sets of objectives are specified in Schedule 1 of EMPCA.

The functions of the Board are to administer and enforce the provisions of EMPCA, and to use its best endeavours to further the RMPS and EMPCS objectives. The Board must assess the proposal in accordance with the Environmental Impact Assessment Principles defined in Section 74 of EMPCA.

3. The Proposal

The main characteristics of the proposal are summarised below. A detailed description of the proposal is provided in Part B of the EER.

Summary of the proposal's main characteristics

Activity

The proposal involves an increase in production at the Branxholm Sawmill from 20,000m^3 to 50,000m^3 of sawn timber product per annum. To accommodate this increase, the proposal includes construction of a new building to house a new profiling gang sawmill line, a replacement band saw, chip screen, and chip bin, and minor modifications to sorting and stacking systems to improve efficiency.

The proposal will increase the amount of sawn timber able to be recovered as a percentage of log input as shown in Table 17 of the EER. The proposal will also result in an increase in the amount of wood chip (from 12,800 to 25,893 tonnes per year), sawdust (from 6,400 to 11,607 tonnes per year) and bark residues (from 800 to 1,785 tonnes per year) produced at the activity site.

Location and planning context.

Location	1628 Warrentinna Road, Branxholm (CT 2131361 and 22422/2) as shown in Figures 1 and 2 below (Part B, Section 2, Figures 1 and 3 of the EER).
Land zoning	The activity site is zoned as Rural Resource under the Dorset Interim Planning Scheme 2013,[1] which describes sawmilling as being within the Resource Processing use class. Resource Processing is a permitted use in the Rural Resource zone.
Land tenure	The activity site is Private Freehold land, owned by Branxholm Sawmills (Tas) Pty Ltd and comprising Certificate of Title References 213136/1 (3.841 hectares) and 22422/2 (0.1584 hectares).

Activity site

Land Use	The activity is a level 2 activity involving timber processing and wood chipping of plantation softwood. Timber processing has occurred on the site since the 1940's and prior to this, the activity site was previously a quarry. The former extractive pit has been filled with waste products and covered with soil. Copper Chromium Arsenate (**CCA**) timber preservation activities also occurred on the activity site until 1993, as shown in Figure 3 of the EER.
Topography	The activity site sits predominantly on alluvial flats at an elevation of 175 m Australian Height Datum (**AHD**).
Geology	The activity site is within the boundaries of a quaternary stream alluvium unit described as Cenozoic cover sequences. The underlying aquifer geology includes quaternary alluvium and tertiary sediments.
Soils	The EER states that soils are not mapped for the activity site however, it is understood that soils are slowly permeable and imperfectly drained. The northwestern portion of the site is mapped as low probability inland Acid Sulfate Soil (**ASS**) as shown in Figure 5 of the EER.
Hydrology	The activity site is located approximately 130 m west of the Ringarooma River which flows in a north-easterly direction, and 300 m east of the Ledgerwood Rivulet, which

[1] The planning application was lodged prior to the adoption of the Tasmanian Planning Scheme and Dorset Local Provisions Schedule on 18 January 2023 and as such, the planning application will be assessed under the Dorset Interim Planning Scheme 2013.

	also flows in a north-easterly direction and joins the Ringarooma River approximately 600 m north of the activity site. Water bore data suggests that groundwater is between 2 and 2.4 m below natural ground level.
Natural Values	The activity site is classed as agricultural land (TasVeg Code FAG). A desktop analysis indicates that there are no records of threatened species on the activity site itself, but several threatened species have been observed within the surrounding area. In addition, there are remnant patches of several listed threatened native vegetation communities within 1,000 m of the activity area, primarily in the riparian areas of Ledgerwood Rivulet and Ringarooma River.

Location region

Climate	Rainfall is approximately 968 mm per annum and wind direction is predominantly westerly and north-westerly.
Surrounding land zoning, tenure and uses	The activity site is surrounded by Crown Land (Public Reserve) which previously contained a railway line. Immediately to the east of the disused railway line is a horse training track and equine park, and the land on the opposite side of Warrentinna Road is used for hops production. The activity site sits on the northern edge of the town of Branxholm and the nearest residence is 30 m away. A number of other residences and short-stay accommodation are located between 52 m and 375 m away from the activity site.
Species of conservation significance	The nearby Ledgerwood Rivulet and the Ringarooma River and their tributaries contain potential habitat for giant freshwater crayfish (*Astacopsis gouldi*), green and gold frog (*Litoria raniformis*), Fern Creek freshwater snail (*Beddomeia briansmithi*) and hydrobiid snail (Scottsdale) (*Beddomeia minima*). In addition, spotted tail quoll (*Dasyurus maculatus* subsp. *maculatus*), Tasmanian devil (*Sarcophilus harrisii*) and eastern quoll (*Dasyurus viverrinus*) have been observed in the vicinity of the site. There are five Tasmanian wedge-tailed eagle (*Aquila audax* subsp. *fleayi*) nests between 1.3 and 4.8km from the site and a grey goshawk (*Accipter novaehollandiae*) nest 830m from the site.

Proposed infrastructure

Major equipment	Much of the equipment will remain the same as is currently used for the existing sawmill operations including: • liquid petroleum gas (**LPG**) direct fired timber drying kiln with a heating capacity of 520,000 kilocalories (kCal) per hour; • LPG storage vessel; • forklifts; • pallet manufacturing equipment; • cyclones and associated ductwork; • internal combustion engine powered chainsaw; and • front end loader; • optimiser system; • scragg saw; and • helle saw; • holtec pack docker; and • chipper. The existing four-headed bandsaw will be decommissioned and replaced with a new six-headed bandsaw which will be housed in the existing sawmill building. The existing scragg saw will remain in its current location in the existing sawmill building. The scragg

	saw currently cuts two sides of a log in a single pass. The log is then rotated ninety degrees and cut again in a second pass to finish all four sides of the log. The proposal includes the installation of a new profiling gang sawmill line to complete the second pass which will introduce efficiencies into the milling process by removing the need to rotate logs ninety degrees and feed them through the scragg saw a second time. In addition, the existing timber sorting and stacking machines will undergo minor modifications to improve efficiency to meet the requirements associated with increased production. These modifications include a 1.5m long extension on the finished pack outfeed chain to allow forklift operators to operate safely without the need for the stacker operator to reverse the pack. See Figure 3 below (Appendix 1 to the Supplement).
Other infrastructure	Much of the infrastructure will remain the same as is currently used for the existing sawmill operations including: • manufacturing workshop; • office and amenities building; • three-sided sawdust residue bunker; • security gate and fence; • internal roads; • manufacturing building; • storage bins; and • carpark. A new building will be erected alongside the existing sawmill building (effectively extending the existing building on the eastern side) to house the new profiling gang sawmill line. An opening will be made in the east wall of the existing sawmill building to connect to the new sawmill building. Enhancements will be made to the existing stormwater infrastructure and settling ponds. The proposal will require the existing overhead power connection and transformer to be disconnected and decommissioned, and a new underground electricity cable and two 2MW transformers will be installed.

Processes

Existing process	The Supplement outlines the existing sawmill processes as follows: • logs are debarked through a ring debarker, removing the bark from the logs; • bark is stockpiled in a designated bunker; • logs segregated into diameter classes after the debarking process and stockpiled ready to be batched into the sawmill; • logs which have been debarked and diameter sorted are fed into sawmill for cutting; • each log is scanned and run through the scragg saw (first pass). Sawdust is collected by pneumatic blower and transferred to the sawdust bunker. In addition, solid residue is separated from sawn timber and directed to the chipper, and export woodchips are transferred from the screen to the overhead chip bin; • the partly processed log is reversed back to the infeed section of the scragg saw and rotated ninety degrees before being run through again (second pass). Sawdust is once again collected by pneumatic blower and transferred to the sawdust bunker. In addition, solid residues are separated from sawn timber and directed the chipper, and export woodchips are transferred from the screen to the overhead chip bin;

	• cants (larger section timber) are directed to the four headed band saw for cutting into finished sizes. Sawdust is collected by pneumatic blower and transferred to the sawdust bunker; • boards are directed to the timber sorting system via green chain; • finished timber is scanned and directed to the sorting machine and reject timber is directed to the chipper; • individual sized timber is sorted into separate bundles; • completed bundles of timber are directed to the stacking machine; • timber is stacked into finished bundles; • further processing may occur per customer requirements including through the pack docking machine, the kiln for heat treatment or for kiln drying or through direction to the manufacturing area for pallets, bins, crates, and industrial uses.
Upgraded process	The Supplement also outlines the sawmill processes that will occur following the upgrade as follows: • logs will be debarked through a ring debarker, removing the bark from the logs; • bark will be stockpiled in a designated bunker; • logs will be segregated into diameter classes after the debarking process and stockpiled ready to be batched into the sawmill; • logs which have been debarked and diameter sorted will be fed into sawmill for cutting; • each log will be scanned and run through the scragg saw (first pass). Sawdust will be collected by pneumatic blower and transferred to the sawdust bunker. In addition, solid residue will separated from sawn timber and directed to the chipper, which will be fitted with a new chip screen (see item 3 in Figure 3 below). Export woodchips will be transferred from the chip screen to a new larger (220m^3 capacity) overhead chip bin which will replace the existing chip bin (80m^3 capacity) (see item 4 in Figure 3 below); • partly processed logs (two flat sides) will be diverted to the new profiling gang sawmill line (see item 2 in Figure 3 below) and each log will be scanned, chipped, profiled, and sawn in one process. Residue will drop to the conveyer system to separate it from sawn timber and be directed to the chipper; • sawn timber will conveyed to the sorting machine, and partly finished timber will be conveyed via a new conveyor (see item 5 in Figure 3 below) to a new six headed band saw for final processing (see item 6 in Figure 3 below). The six headed band saw will replace the existing four headed band saw. Sawdust will be collected by pneumatic blower and transferred to the sawdust bunker; • boards will be directed to the timber sorting system via green chain; • finished timber will be scanned and directed to the sorting machine and reject timber will be directed to the chipper; • individual sized timber will be sorted into separate bundles; • completed bundles of timber will be directed to the stacking machine; • timber will be stacked into finished bundles; • further processing may occur per customer requirements including through the pack docking machine, the kiln for heat treatment or for kiln drying or through direction to the manufacturing area for pallets, bins, crates, and industrial uses.

Inputs

Water	Water will be sourced from the settling pond onsite or alternatively, the domestic water supply, as required for water sprays to suppress dust and dampen internal roads.
Energy	Energy inputs include LPG for the kiln, fuel (diesel) for mobile and fixed equipment and electricity for sawmilling equipment.
Other raw materials	The sawmill will have an input volume of 89,285 tonnes of logs (plantation softwood) per annum.

Wastes and emissions

Liquid	Stormwater runoff from stockpile areas and gravel surfaces.
Atmospheric	Dust from internal and external traffic; blow-off from stockpiles of sawdust; fine particulate matter emitted from saws during timber cutting; diesel exhaust fumes from mobile and fixed machinery; gases from stockpiles of sawdust; gas from timber treatment in the kiln.
Solid	General refuse including food scraps, paper and packaging, which are to be collected periodically. The construction of the new sawmill line building will produce packaging, as well as waste from equipment and infrastructure that is being decommissioned or demolished and the excavation of approximately 31m^3 of spoil.
Controlled wastes	Waste oil; hydraulic fluid. On site toilets are connected to a septic tank and soakage field, and these will also generate sanitary waste.
Noise	Noise emissions will be generated from the de-barker, front end loader, processing building (including sawmill line), dust control systems, chipper, chainsaw, kiln and vehicles on site and going to and from the site.
Greenhouse gases	The EER states that the proposal will utilise equipment more efficiently and minimise waste, thereby contributing to carbon emission reductions.

Construction and operations

Proposal timetable	The EER is silent on the proposed timeline for construction of the new sawmill line however, the EPA understands that construction is likely to commence in 2025.
Operating hours (ongoing)	Activities associated with the milling or machining of timber and the loading and unloading or wood deliveries to and from the activity site must only be undertaken within the hours of 0700 to 1800, Monday to Saturday. Activities associated with the milling or machining of timber and the loading and unloading or wood deliveries to and from the activity site cannot be undertaken on Sundays and public holidays that are observed statewide without written approval from the Director. The internal combustion engine powered chainsaw must only be operated intermittently on the activity site within the hours of 0700 to 1800, Monday to Saturday with no operation permitted on public holidays that are observed statewide. The gas-fired kiln may be operated 24 hours per day, seven days week, noting that the average drying cycle time is 24-48 hours depending on timber size.

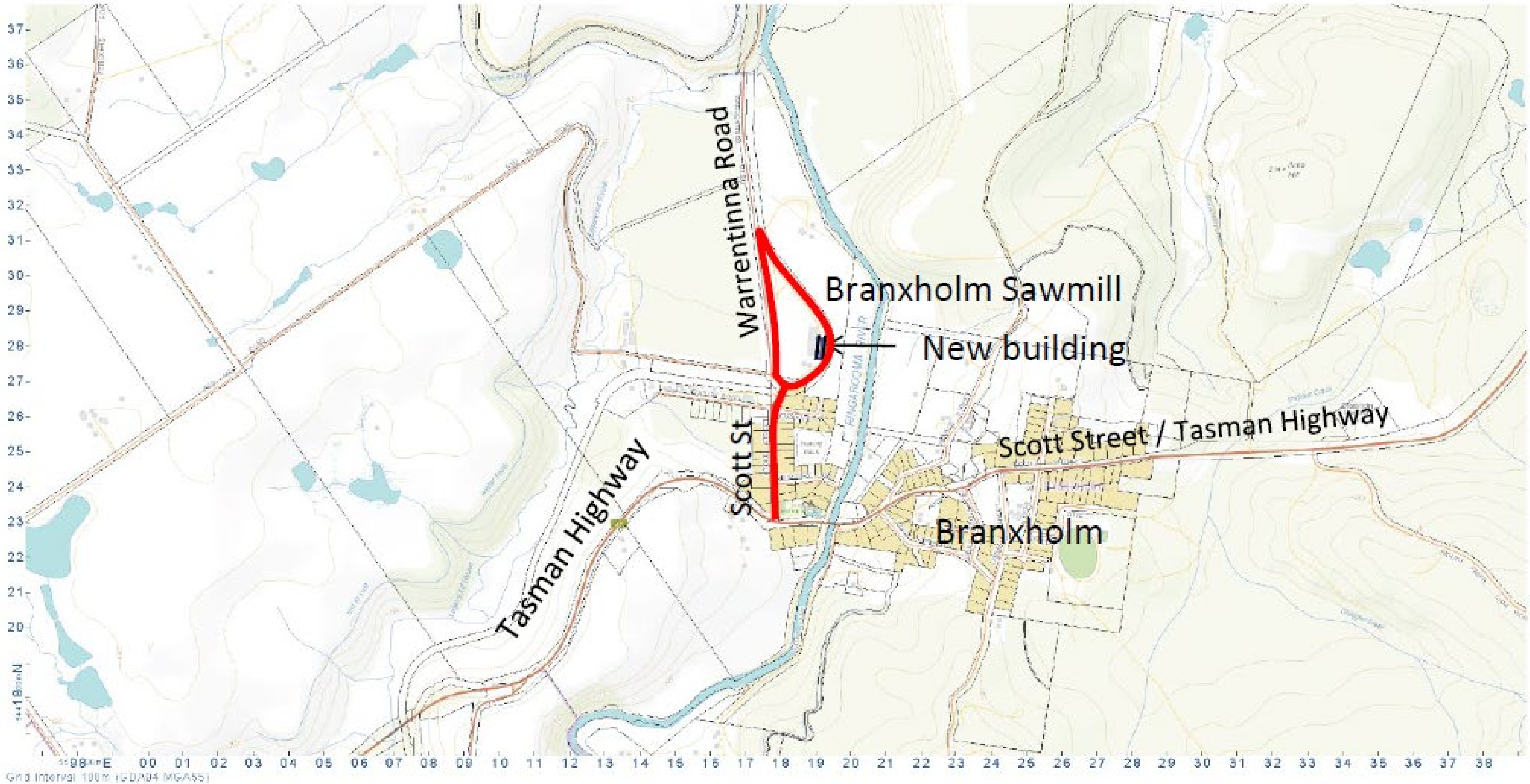

Figure 1: Proposed location and transport routes (Figure 1 of the EER)

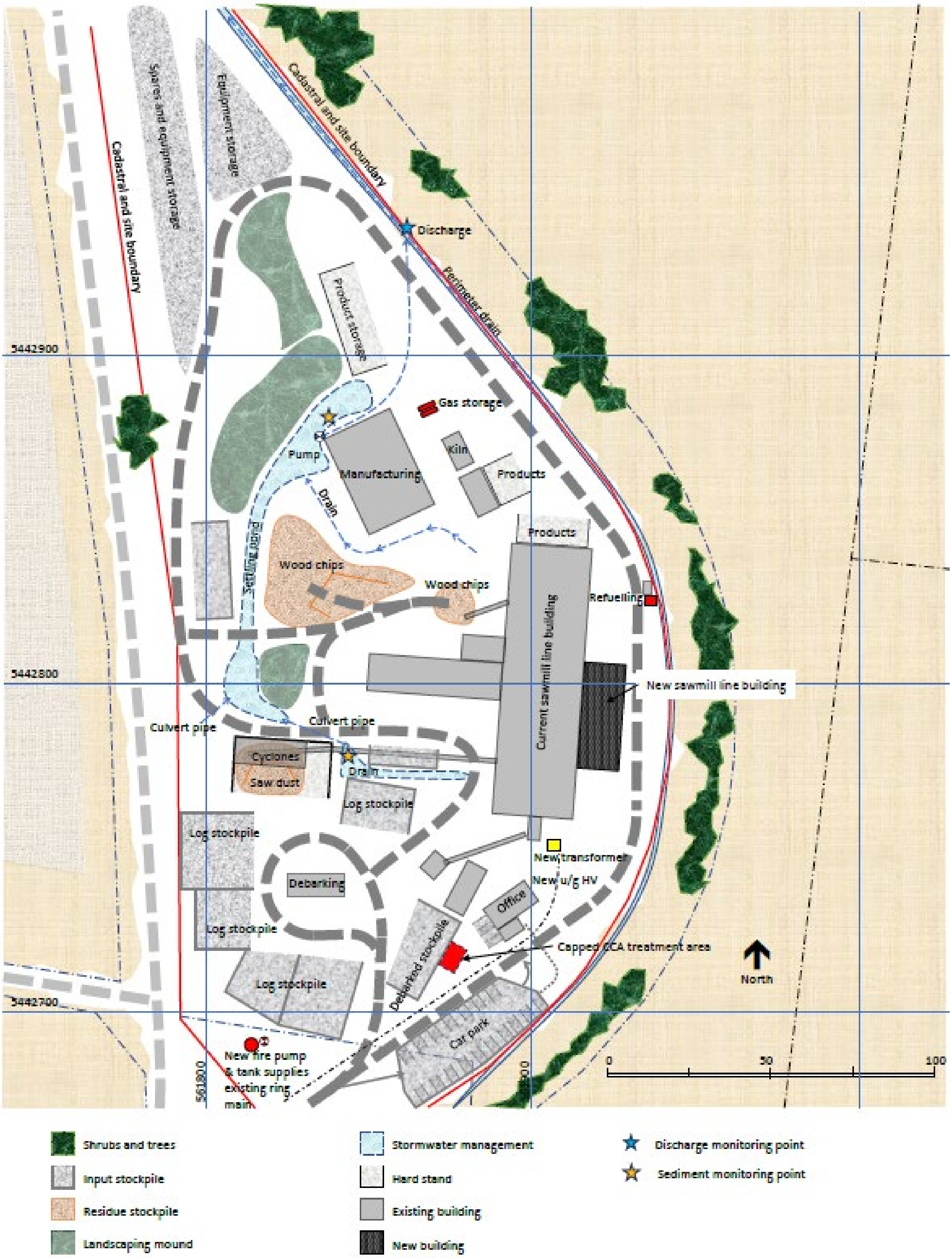

Figure 2: Site plan (Figure 3 of the EER).

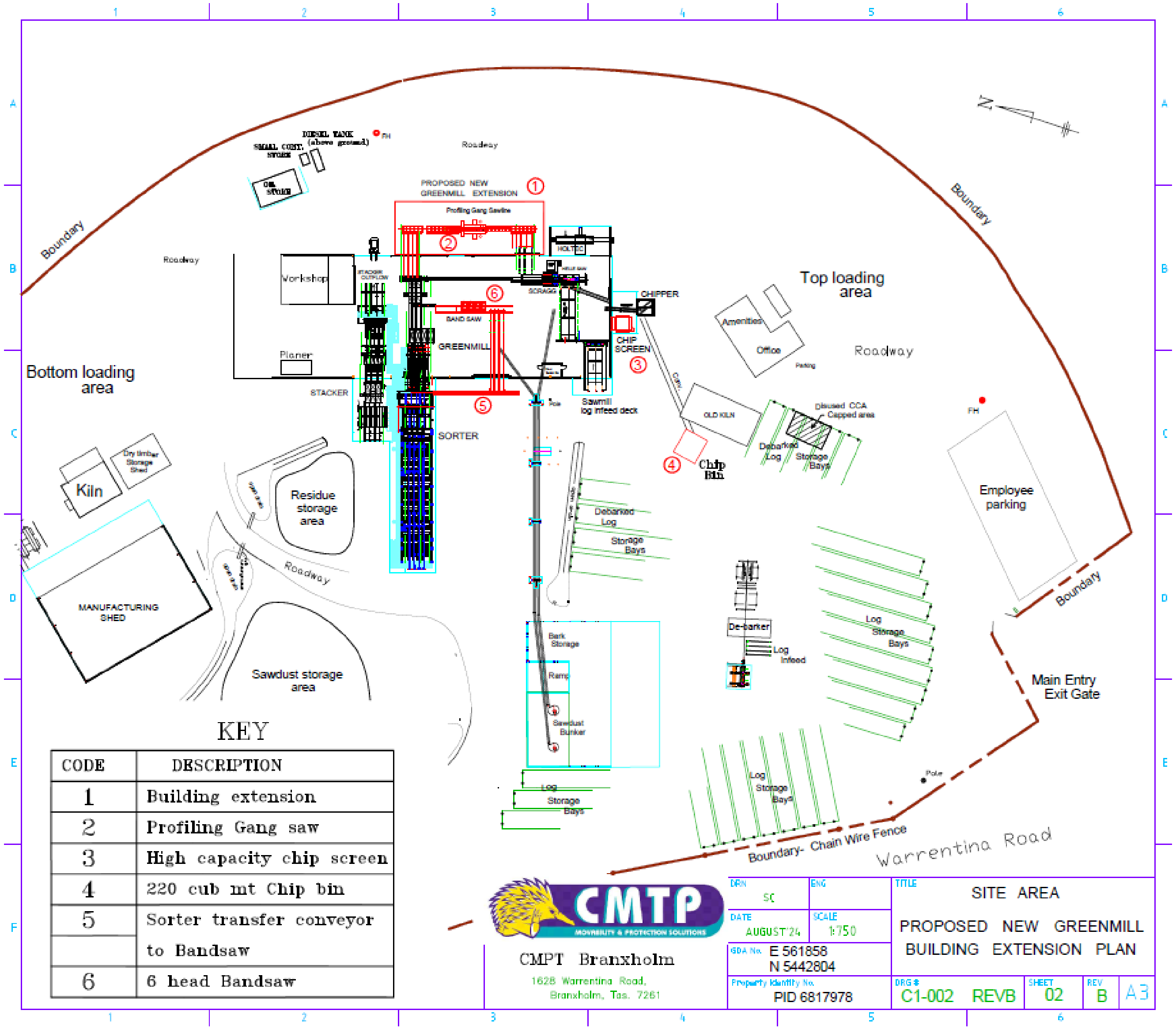

Figure 3: Site plan showing new, replaced or modified equipment in red (Appendix 1 to the Supplement).

4. Project Rationale and Alternatives

According to the EER, the activity site is in a strategic location relative to large timber plantation resources in the north-east of Tasmania and the freight route along the Tasman Highway. The EER states that CMTP converts the greatest proportion of timber resource into high value, saleable timber products including woodchip, pine bark and sawdust residues. The EER also states that the proposal will increase recovery of timber from 50% to 56% through increased efficiencies from upgrades and modifications to existing equipment, and the installation of a new sawmill line. It is also noted that in the EER that the sawmill employs local people from the town of Branxholm.

The EER notes that two alternative locations were explored for the relocation and operation of the sawmill under increased production but ultimately were not pursued due to the costs associated with purchasing land and relocating infrastructure.

5. Public and Agency Consultation

No public submissions were received during the public consultation period.

The EER was also referred to several government agencies with an interest in the proposal. A submission was received from the Conservation Assessments Section, Department of Natural Resources and Environment Tasmania (**NRE Tas**).

The following individuals also provided specialist advice on the EER:

- Regulatory Officer, Environment Protection Authority
- Scientific Officer (Air), Environment Protection Authority
- Scientific Officer (Water), Environment Protection Authority
- Scientific Officer (Noise), Environment Protection Authority

Appendix 1 of this report contains a summary of the government agency submissions received.

6. Evaluation of Environmental Issues

The following environmental issues are considered relevant to the proposal and have been evaluated in this section:

1. Air Quality
2. Surface and Groundwater Quality
3. Noise Emissions
4. Natural Values
5. Weeds
6. Waste Management, Dangerous Goods and Environmentally Hazardous Substances
7. Site Contamination
8. Decommissioning and Rehabilitation

6.1 General conditions

The following general conditions will be imposed on the activity:

- **G1** Access to and awareness of conditions and associated documents
- **G2** Incident response
- **G3** Proposed change to activity
- **G4** Change of responsibility
- **G5** Change of ownership
- **G6** Complaints register
- **G7** Annual Environmental Review.
- **G8** Amendment of required plans and reports
- **G9** Notification of commissioning

6.2 Issue 1: Air Quality

6.2.1 Description and potential impacts

The primary air emission of concern at the activity site is dust but emissions also include greenhouse gases from plant and equipment used to undertake the activity.

Various activities are undertaken at the site which have the potential to produce dust and gases. The activity produces residues in the form of sawdust, woodchips, and bark, which can result in dust emissions. Fine particulate matter is emitted from the saws, dust is emitted from road surfaces by machinery and traffic, exhaust fumes are emitted from diesel powered equipment, and gases are given off from stockpiles of sawdust. The construction phase of the proposal will also result in emissions associated with dust and particulates during demolition of existing infrastructure and excavation of spoil, and exhaust fumes from construction equipment.

Gases are emitted from the LPG-fired kiln when it is used for drying timber (average annual volume of timber kiln dried is 700m^3) to reduce moisture content. These gases largely consist of moisture evaporated from the wood during the drying process as well as small amounts of wood turpentine compounds and Volatile Organic Compounds. The combustion of LPG is also considered a source of nitrogen oxides. Although the kiln is also used for heat treating timber (average annual volume of timber heat treated is 2,250m^3) to achieve the requirements of the Australian Wood Packaging Certification Scheme for Export, the kiln vents are shut during this process and therefore few emissions are produced.

If the activities on site are not managed appropriately, they have the potential to cause environmental nuisance beyond the boundary of the Land. For example, dust generated by the proposal may collect on roofs of nearby residences and impact on tank water, washing and vegetation. Dust generated from the proposal also has the potential to cause respiratory issues and otherwise interfere with enjoyment of the environment. The sawmill is in an area predominantly surrounded by Crown Land, a horse training track and equine park, and a hops production area. The horse training track is currently listed for sale and although it is possible that housing may be constructed on this property in the future, it sits within a flood-prone hazard area under the Tasmanian Planning Scheme which presents challenges to any future use of the land for residences. Dorset Council confirmed as at July 2024 that no planning application has been lodged for housing development or use on this property. The nearest residence is located 30m to the south of the boundary of the Land and several other residences and short stay accommodation facilities are located between 52m and 375m from the site. Land and sensitive receptors to the east of the activity site are likely to be more susceptible to dust carried by the prevailing westerly winds. Figure 4 below (Figure 2 in the EER) shows the location of the nearest sensitive receptors. Table 21 of the EER also lists thirteen sensitive receptors that have street frontage which makes them susceptible to potential dust impacts from increased traffic movements associated with the proposal.

6.2.2 Management measures proposed in EER

The EER lists the existing avoidance and mitigation measures in relation to dust and gas emissions. The existing measures include:

- a three-sided bunker to temporarily store residue sawdust prior to collection;
- fully enclosed blower systems;
- impeller fans;
- a ducted system comprising inlet heads, rigid ductwork and two cyclones.

The EER also states that the internal access road is sealed for 20 metres inside the gate, and loading ramps and designated concrete unloading areas are utilised on site to minimise waste and residue escaping onto the ground. The EER commits to what it describes as additional avoidance and mitigation measures including:

- fitting trucks with tarps;
- maintaining slow vehicle speeds of 10km per hour;

- using low dust producing road base on internal roads;
- frequent turning of residue stockpiles to reduce gas production and prevent composting;
- installation of a wind sock; and
- deployment of water sprays using water from the settling pond or domestic water supply during dry and/or windy conditions.

6.2.3 Public and agency comment

No public representations or agency submissions were received in relation to air quality.

6.2.4 Evaluation

The EER states that no dust complaints have been received by the proponent. Although the proposal will increase the volume of products and residues produced at the site, products and residues can be contained within the existing available storage capacity. The exception is wood chips which will be stored in a larger 220m³ bin that will replace the existing 80m³ bin. It appears from the information provided in the EER that the proposal is unlikely to change the characteristics of both dust and gas emissions from that already produced by the existing operations.

The existing approval for the activity, namely, Permit Conditions Environmental (**PCE**) No. 8663 as varied by Environment Protection Notice (**EPN**) No. 10008/1 (**the Permit**) does not contain any conditions requiring monitoring of emissions from the kiln or the combustion of LPG. The EER states that the proposal will not result in any additional kiln throughput as the additional volume of timber produced will be sold as green sawn pine into the fencing, industrial dunnage, and pallet markets. As such, the proposal will not result in an increase in gas emissions or combustion of LPG from the kiln. On this basis, conditions requiring monitoring are still not considered necessary. It is noted however, that condition **G3** is relevant as it will ensure that the Director of the EPA is notified about any increase in volume of timber to be kiln dried in the future.

Greenhouse gases and climate change are addressed in section C.13 of the EER. The EER recognises that the use of plant and equipment which uses hydrocarbon-based fuels contributes to greenhouse gas emissions. The EER outlines guiding principles for minimising greenhouse gas emissions which are generally supported. Principles include using more energy efficient equipment, using local supply chains and optimising processes to increase recovery ratios of material.

The avoidance and mitigation measures are supported, although it is noted that the proponent is already required to implement effective control measures to prevent the escape of materials from vehicles in accordance with Condition A1 of its existing Permit.

To ensure that existing and proposed avoidance and mitigation measures will be implemented and remain effective, conditions **A1**, **A2, A3**, **A4** and **A5** are imposed. Condition **A1** requires that any vehicles carrying loads of material that have the potential to blow or spill must be equipped with effective control measures to prevent the escape of material from the vehicles when they leave The Land or travel on public roads, such as tarpaulins or load dampening.

Furthermore, condition **A2** requires that dust emissions from The Land must be controlled to the extent necessary to prevent environmental nuisance beyond the boundary of The Land.

Condition **A3** requires construction activities to be managed to prevent dust emissions causing environmental nuisance, and condition **A4** requires sawdust collection and storage systems to be designed and maintained to control fugitive emissions. In addition, condition **A5** prohibits the burning of sawdust, wood chips and other wood wastes on the Land, unless otherwise approved by the Director in writing.

Condition **A6** is also imposed to ensure that: dust complaints are reported to the Director of the EPA within 24 hours, even when those complaints are able to be resolved with the community directly.

Based on the information provided and commitments made in the EER, and the standard conditions imposed as detailed above, it is considered the potential environmental risks from dust and gas emissions can be adequately managed to ensure that environmental nuisance is not caused at any nearby residences from the proposal.

6.2.5 Conditions

The proponent will be required to comply with the following conditions:

- **A1** Covering of vehicles
- **A2** Control of dust emissions
- **A3** Control of dust emissions during construction
- **A4** Control of fugitive emissions – Sawdust
- **A5** Restrictions for burning on-site
- **A6** Dust complaints

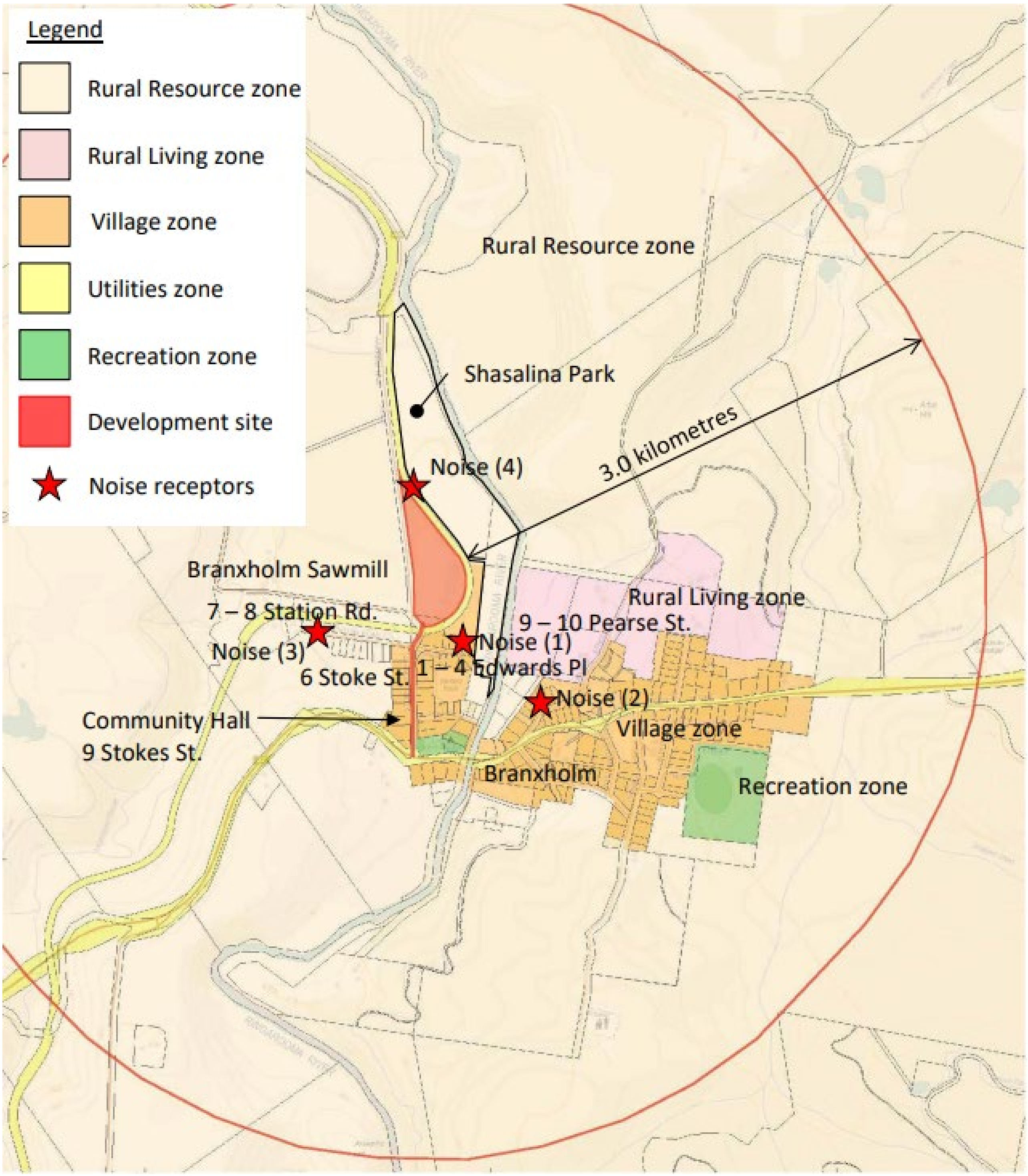

Figure 4: Surrounding residences (Figure 2 of the EER)

6.3 Issue 2: Surface and Groundwater Quality

6.3.1 Description and potential impacts

The proposal involves activities such as timber debarking, sawing, and chipping, and increased truck movements as well as refuelling and maintenance of vehicles, plant, and equipment, all of which have the potential to be sources of pollutants (e.g. sediments, fuel and oil) that may impact surface or groundwater quality if not managed appropriately.

In addition, the main aspect of this proposal involves the modification of an existing building and construction of a new building and sawmill line which has the potential of an increased risk of sediments being entrained in stormwater and causing erosion if not managed appropriately. Construction activities also have the potential to impact on or contaminate groundwater, noting that CCA timber preservation activities were conducted on the site until 1993.

The activity site is located approximately 600m south of the confluence of the Ringarooma River and Ledgerwood Rivulet. The existing stormwater infrastructure at the site discharges to a perimeter drain which connects to a roadside drain servicing Warrentinna Road. The EER states that the elevated position of Warrentinna Road and the public reserve surrounding the site mean that the roadside drain intercepts and diverts run off from the activity site. The roadside drain eventually discharges to the Ledgerwood Rivulet as shown in Figure 4 of the EER. Both the Ringarooma River and Ledgerwood Rivulet are classified as having a very high conservation management priority potential in the Conservation of Freshwater Ecosystem Values (**CFEV**) database and provide potential habitat for several listed threatened species including the giant freshwater crayfish (*Astacopsis gouldi*). Discharges of sediment and other pollutants to these watercourses has the potential to smother aquatic flora and fauna and degrade habitat for threatened species.

6.3.2 Management measures proposed in EER

The EER states that the existing drainage and sediment control infrastructure, as shown Figure 2 above (Figure 3 of the EER), will continue to be utilised and maintained. This infrastructure includes a:

- log stockpile drain between the log storage area and storage area for crates which collects run off from the log storage area and buildings surrounding this area;
- settling pond which collects run off from the log stockpile drain, sawdust storage pad, perimeter access road and the main buildings; and
- pump and poly pipeline to capture and direct water from the settling pond to the perimeter drain;
- a fully bunded refuelling station with a triple interceptor trap which separates hydrocarbons from surface water, and an oil storage facility.

The EER goes on to state that contamination of stormwater is to be managed through avoidance and mitigation measures, including:

- minimisation of ground disturbance and stockpiling of erodible soils associated with the construction of the new building and sawmill line;
- timing construction of the new building and sawmill line to coincide with the summer months when rainfall is low;
- minimisation of stormwater ingress and sediment mobilisation by utilising and enhancing existing drainage and sediment control infrastructure, including installing a skimmer on the pump to further prevent sediment being drawn into the poly pipeline;
- visual monitoring of the log stockpile drain, sediment pond and point of discharge to the perimeter drain as shown in Figure 2 above (Figure 3 of the EER);
- maintenance and clean-out of the log stockpile drain, sediment pond and perimeter drain as specified in Table 10 of the EER; and

- minimisation of the risk of hydrocarbons being discharged to the environment through utilising the existing refuelling and oil storage facility, and maintaining a hydrocarbon spill kit and boom that can be deployed on the surface of the sediment pond to contain any accidental spills.

The EER states that the risk of groundwater contamination is also mitigated by minimisation of ground disturbance during construction of the new building, and by locating the new building away from the area on which quarrying, and CCA timber preservation activities were previously conducted, as shown in Figures 2 (Figure 3 of the EER) and 3 (Appendix 1 to the Supplement) above.

6.3.3 Public and agency comment

No public representations or agency submissions were received in relation to surface and groundwater quality.

6.3.4 Evaluation

The EER states the proposal will not change the size of the developed area on which the activity is undertaken, and therefore, that the existing drainage and sediment control infrastructure is considered sufficient to control run off and sediment generated from the activity site in a 1 in 20-year (approximate Annual Exceedance Probability (AEP) of 5%) event based on the calculations presented in the EER. Although the overall size of the developed area will not change, it is noted that the new building that will house the profiling gang sawmill line will be approximately 300m^2 in size and will be constructed on an area of the site that is currently gravel hardstand. The EER states that the new and existing buildings will direct stormwater captured on roofs through downpipes to the ground, and that this will decrease the sediment load by reducing the area of catchment that comprises unmade surfaces.

The commitment to utilise and maintain the existing drainage and sediment control infrastructure is supported as the infrastructure is reasonably sized as demonstrated by accepted calculation methods in the EER. The settling pond, if appropriately maintained as specified in the EER, is adequate to provide treatment of site stormwater to a quality suitable for periodic discharge to perimeter and roadside drain and ultimately to the Ledgerwood Rivulet and Ringarooma River. The EER demonstrates that discharge events will be stormwater driven, are therefore likely to only occur during periods of high flow in the Ledgerwood Rivulet and Ringarooma River and will likely be highly diluted.

The commitments to implement avoidance and mitigation measures are also supported. To reflect these commitments, condition **SW1** requires the implementation of measures to retain solids in stormwater on The Land during construction of the new building. In addition, condition **SW2** requires construction of perimeter cut off drains / bunds and any other stormwater management infrastructure required (e.g. sediment pond(s)) to ensure stormwater is managed appropriately, and condition **SW3** sets out the required minimum standards for the design and maintenance of any sediment ponds constructed for managing stormwater. To support these conditions, **SW4** is also imposed requiring all reasonable measures to be implemented to ensure solids entrained in stormwater are retained on The Land, and that any polluted stormwater discharged from The Land is first collected and treated to the extent necessary to prevent environmental harm or nuisance. It also requires that any discharge from The Land does not degrade the visual quality of any receiving waters outside The Land.

Construction of the new building will not require piling, and the foundations will consist of a raft style, concrete slab with a perimeter edge-beam, as outlined in the preliminary construction drawings in Appendix 2 of the EER. Given that water bores indicate that groundwater is between 2 and 2.4 metres below natural ground level, and the proposed construction method will not cause significant ground disturbance, groundwater is unlikely to be intersected during construction of the new building. The location of the new building also avoids parts of the site on which quarrying and CCA timber preservation activities were previously conducted, which further minimises the potential of the proposal to impact on or contaminate groundwater. The EER also states that following cessation of CCA timber preservation activities at the site in 1993, ground water monitoring was undertaken in accordance with the conditions of the Permit. In 2011, the groundwater monitoring requirement was removed from the Permit in consultation with the EPA Water Specialist as the monitoring undertaken demonstrated that groundwater contamination had not occurred and/or was unlikely to occur. On this basis, conditions imposing requirements for the management of groundwater are not necessary. However, condition **OP1** is imposed to prevent disturbance of the area on which CCA timber preservation activities were previously conducted unless otherwise approved in writing by the Director.

6.3.5 Conditions

The proponent will be required to comply with the following conditions:

- **SW1** Retention of sediment
- **SW2** Perimeter drains or bunds
- **SW3** Maintenance of settling ponds
- **SW4** Stormwater
- **OP1** Copper Chromium Arsenate area

6.4 Issue 3: Noise Emissions

6.4.1 Description and potential impacts

History of noise surveys and noise emissions limits

The Board last assessed the activities undertaken on the site in 2013 when the proponent sought to increase production and install a new gas fired kiln. At the time of the 2013 assessment, the site was subject to Environment Protection Notice 7768/2 which imposed noise emission limits of 50 dB(A) between 0700 hours and 1800 hours (daytime) and 40 dB(A) between 1800 hours and 0700 hours (night-time).

As part of the 2013 assessment, daytime noise levels were measured by the proponent's consultant at four locations including the nearest noise sensitive premises at Edwards Place. The daytime noise measurements, in $L_{Aeq,\ 10min}$, ranged from 41dB(A) to 57dB(A). The results of the noise measurements were presented in a report which is included as Appendix 4 to the EER. The report concluded that the site was in breach of its current daytime noise emission limit at the nearest noise sensitive premise at Edwards Place and identified the main sources of noise as the scragg saw, chipper, and tones from the dust extraction blowers. The report also included the results of noise modelling in support of the 2013 assessment and concluded that the predicted noise emission levels from the new kiln were below the nighttime noise emission level of 40 dB(A).

The 2013 report recommended mitigation measures to address the issues identified, and reduce emissions to below 50 dB(A) including:

- renovation of the chipper room;
- closing of openings on the facades of existing buildings; and
- internal lining within existing buildings; and
- the planting of vegetation along the southern boundary of the site.

The 2013 report also discussed the potential installation of silencers on the kiln fans in the future, in the event that the fans produce tones that have the potential to be clearly audible. The Board's Environmental Assessment Report stated that the proponent was committing to the implementation of these noise attenuation measures.

On 16 August 2013, the Board issued PCE No. 8663 which included a condition reimposing the existing noise emissions limits of 50 dB(A) between 0700 hours and 1800 hours (daytime) and 40 dB(A) between 1800 hours and 0700 hours (night-time). PCE No. 8663 also imposed requirements for a further noise survey to be undertaken and a noise report to be completed within 12 months of PCE No. 8663 taking effect, restrictions on operating hours, and reduction of log drops.

Daytime noise levels were measured at the four receivers listed in Table 12 of the EER again in 2014 to comply with the requirements of PCE No. 8663. The results of the noise measurements, which were documented and provided to the EPA on 12 November 2014, showed that the $L_{Aeq,\ 10min}$ had reduced to 51dB(A) at the nearest noise sensitive premise at Edwards Place. The 2014 report concluded that although an approximate 5dB(A) reduction had been achieved at Edwards Place through the implementation of noise attenuation measures, the site was still in breach of its current daytime noise emission limit. The 2014 report reiterated several of the noise attenuation recommendations from the previous 2013 report and included additional recommendations to mitigate noise emissions from the operation of a front-end loader.

On 22 December 2014, a delegate of the Director, EPA advised the proponent to consider implementing these recommendations and to prioritise attenuating noise emissions from the chipper and scragg saw. The delegate also required the proponent to undertake a further noise survey prior to 21 October 2017.

After seeking an extension of time in December 2017, the proponent provided the required noise report on 28 March 2018, outlining the results of further noise measurements that had been undertaken by a new consultant. The report containing the results of the 2018 measurements is presented in Appendix 5 to the EER. The debarker was not operational when the measurements were undertaken on 28 March 2018. The daytime noise measurements, in $L_{Aeq,\ 10min}$, ranged from 47 dB(A) to 53 dB(A) and the report concluded that the noise levels observed at the nearest noise sensitive premise at Edwards Place, as well as at the northern boundary of the site, were above the noise emission limits when adjusted for dominant and intrusive characteristics. The 2018 report also stated that the recommendations from the previous 2014 report for controlling noise emissions from the chipper and scragg saw remained valid.

On 16 May 2018, the Director, EPA advised the proponent that the results of the 2018 survey indicated that in some instances, noise emissions exceeded the limits specified in PCE No. 8663. Based on advice from the EPA Noise Section, the Director also requested that the proponent provide a Noise Management Plan by 30 July 2018 to bring the site into compliance, noting the proximity of the site to the town of Branxholm.

On 25 July 2018, the proponent wrote to the Director, EPA outlining the noise mitigation measures that had already been undertaken at the site in recent years to minimise noise emitted from the operation, including:

- re-classing all walls on the chipper building with noise insulating material;
- installing a solid sliding door on the chipper building;
- enclosing two open sections of the sawmill building;
- putting procedures in place to ensure sawmill doors are closed when not in use;
- restricting log truck hours to delivering during the daytime noise period only;
- modifying the log loader reversing beeper to white noise type;
- putting procedures in place to reduce log drops on site; and
- planting trees along the southern boundary of the site.

Based on the letter of 25 July 2018, the only additional mitigation measure that had been implemented since the 2018 noise survey was the storage of finished timber racks along the southern boundary of the site while the trees continued to grow. The letter was accepted by the EPA as the required Noise Management Plan. An audit conducted by the EPA Regulator in late 2018 confirmed that the above noise mitigation measures have been implemented.

In 2019, the EPA Regulator undertook a review of PCE No. 8663 in response to a request from the proponent to review their noise emission limits and increase their production from 15,000m^3 per year to 20,000m^3 per year. At this time, the proponent indicated that while there had been no noise complaints, the site was struggling to meet its current daytime noise limit of 50dB(A). The review considered the previous non-compliances with noise emission limits and described these as 'low-level'. Advice from the EPA Noise Section was provided in 2019 as part of the review and indicated that an amended daytime noise limit of 55dB(A) would be appropriate. The EPA Noise Section also advised that the EPA should require that any future changes do not compromise this limit (or a lower limit, such as 50dB(A)) and that the proponent should opportunistically reduce noise levels over the long term, such as at times when equipment is replaced.

On 15 May 2019, a delegate of the Director issued EPN No. 10008/1 varying PCE No. 8663 to increase the production limit to 20,000m^3 and increase the daytime noise emission limit to 55dB(A). EPN No. 10008/1 also included a condition requiring compliance with the Noise Management Plan dated 25 July 2018, as amended from time to time with written approval from the Director. When issuing the Permit, the EPA Regulator also advised the proponent in writing that it is rare for a noise emission limit to be increased, and such an increase is only done with the expectation that despite the increase, all efforts will be undertaken to reduce noise wherever practicable in accordance with section 12(2) of the *Environment Protection Policy (Noise) 2009* (**the Noise Policy**). To this end, the Permit also included the following information in Schedule 3:

- the noise emission limits set by condition N2 are considered to be consistent with current operations;
- the noise emission limits set by condition N2 are considered to be consistent with section 10(1) of Part 3 of the Noise Policy regarding protection to the activity from encroachment by noise sensitive use or development; and
- notwithstanding the above, the person responsible should employ best practice environmental management to reduce noise emissions from the activity over time, to the greatest extent possible that is reasonably practicable (refer to section 12(2) of the Noise Policy).

Several changes have occurred at the activity site since the last noise survey in 2018 including:

- in January 2019, a log optimising system which scans and positions logs into optimal cutting positions to maximise recovery was installed;
- in November 2019, a three-sided residue bunker and dedicated log truck unloading area was constructed and blowers were redirected from the previously used open pit to the bunker;
- in January 2020, a timber sorting and stacking machine was installed at the end of the sawmill line; and
- in May 2020, a new manufacturing building was constructed to house the pallet making equipment.

The EER states that these changes did not substantially alter the noise emitted from the site as the new equipment either had no effect on noise emissions or was not recognised as being associated with the main noise generating processes in a sawmill.

Existing environment and emission sources

The entire town of Branxholm is within 1km of the boundary of the activity site. Table 3 of the EER and Figure 4 above (Figure 2 of the EER) identifies and shows the location of ten residences that are within 375m of the site, with the nearest residence being 30m to the south of the site boundary. Table 21 of the EER also lists thirteen sensitive receptors that have street frontage which makes them susceptible to potential noise from increased traffic movements associated with the proposal.

The EER Guidelines for the proposal required the proponent to provide current noise levels at the nearest noise sensitive premises in other ownership by undertaking a new noise survey. Noise source measurements were collected, which were then used to model the existing and proposed operations, however, the proponent disputed the requirement for measuring at the noise sensitive premises. As a result, the EER only includes results of noise modelling, using the 2018 noise survey data for validation.

The EPA Noise Section did however, conduct attended and unattended measurements at the noise sensitive premises in May 2024 as this data is vital for adequately assessing the new proposal. It was found that the activity marginally exceeds the 55 dB(A) limit at the nearest noise sensitive premise at Edwards Place. Based on the conducted 'pre-sawmill start up' attended measurements at this location, ambient noise levels ($L_{Aeq,10mins}$) ranged between 41-44 dB(A) and the operational noise of the sawmill resulted in the ambient noise reaching $L_{Aeq,10mins}$ 55-57 dB(A). The resultant ~10 dB increase suggests that the ambient noise at this location is controlled by the sawmill noise, when operational. It is also noted that while undertaking these measurements, a number of openings on southern and eastern facades of the existing building were observed.

Section C.3 of the EER describes the noise associated with the activity. According to the EER the following activities occur as part of the proposal and generate noise emissions that have the potential to travel beyond the boundary of The Land and cause environmental nuisance:

- loading and unloading of material onto and off trucks;
- forklift, front end loader and truck movements to cart material within, and to and from, the Land;
- milling, sawing, chipping, de-barking and machining of timber;
- stacking and sorting of timber and timber products;
- timber drying and heat treatment of timber in the kiln;
- blowing and extraction of sawdust; and
- construction of timber products such as pallets.

A list of the existing and proposed noise producing equipment used to undertake the above activities is detailed in Section C.3.1.1, Table 11 and Appendix 3 to the Supplement; however, several pieces of existing noise producing equipment are missing from this list, namely, chainsaws powered by internal combustion engines and a Holtec pack docking saw. The proponent advised the EPA Regulator in 2020 and the EPA Assessments Officer in 2024 that chainsaws are only used intermittently, one or two times per week, during existing operating hours for a duration of less than five minutes per event to remove log jams. In addition, the Supplement states that the Holtec pack docking saw will remain on site in its current location after the proposal is commissioned and was included as an input in the noise modelling as part of building radiated noise calculated from an internal reverberant noise field.

The EER states that the proposal will not change the volumes of light vehicle traffic that are currently generated by the activity however, increases are expected in heavy vehicle movements during existing daytime operating hours (0700-1800 hours). Specifically, it is predicted that the proposal will result in an increase of average heavy vehicle movements from 24 vehicles per day at present to 48 vehicles per day. The EER also states that:

- 90% of heavy vehicles will enter and leave the site by travelling via Stoke Street and the Tasman Highway;
- 10% of heavy vehicles will enter and leave the site by travelling via Warrentinna Road; and
- volumes of heavy vehicle traffic will vary due to demand.

Noise modelling and survey results

Appendix 6 to the EER provided a noise assessment and modelling for the proposal however, the proponent confirmed in writing on 18 August 2024 that the modelling was based on a different site layout than what is proposed, including a larger building to house the new profiling gang sawmill line. A Supplement was requested, and the modelling was re-run based on a smaller building size and correct site layout. Appendix 3 to the Supplement provides the updated noise assessment and modelling for the proposal.

Sound power levels for noise producing equipment were calculated from a combination of site measurements, manufacturers data, internal measurements and radiated noise calculated from modelled transmission loss. Predicted noise levels are modelled using both the ISO 9613[2] and CONCAWE[3] prediction algorithms and assume that:

- the eastern and southern walls of the new building are internally lined with 6mm compressed fibre cement;
- the eastern wall of the existing building to the south of the new building is lined with 6mm compressed fibre cement; and
- there are no openings on southern and eastern facades of the existing building and the new building.

Operational scenarios were modelled for the following settings for the proposal:

[2] ISO 9613-2:1996 *Acoustics – Attenuation of sound during propagation outdoors – Part 2: General method of calculation*.
[3] CONCAWE *The oil companies' international study group for conservation of clean air and water* – Europe (est. 1963) report 4/81.

- **existing operations** – standard day operations with all existing noise sources operational, including the de-barker;
- **new operations** – operation of the new profiling gang sawmill line within the new building; and
- **cumulative existing and new operations** – standard day operations with all existing noise sources operational, including the de-barker, as well as operation of the new profiling gang sawmill line within the new building.

Noise contours for the different modelling scenarios are presented in Figures 5, 6, 7 and 8 below and the results of the noise survey measurements from 2013, 2018 and 2024 and noise modelling are outlined in Table 1 below.

Table 1: Summary of daytime noise measurements and modelling results (compiled from Appendices 4, 5 and 6 of the EER, Tables 4-7, 4-8, 4-9 and 4-10 in Appendix 3 of the Supplement, and results of EPA noise measurements in May 2024)

$L_{Aeq,10mins}$ dB(A)										
Receiver	Vipac Report (2013)	Vipac Report (2014)	Tarkarri Report (2018)	EPA Survey (2024)	Tarkarri Report (2024) Existing Operations		Tarkarri Report (2024) New Operations		Tarkarri Report (2024) Cumulative Existing and New Operations	
					Predicted CONCAWE	Predicted ISO 9613	Predicted CONCAWE	Predicted ISO 9613	Predicted CONCAWE	Predicted ISO 9613
1 – Southern Boundary/ Edwards Place	57	51	53	57	58	54	45	39	57	53
2 – Pearce Street	51	49	50	53	45	42	31	27	43	40
3 – Station Road	41	48	48	-	48	44	30	27	47	43
4 – Northern Boundary	44	45	51	-	49	44	32	29	49	44

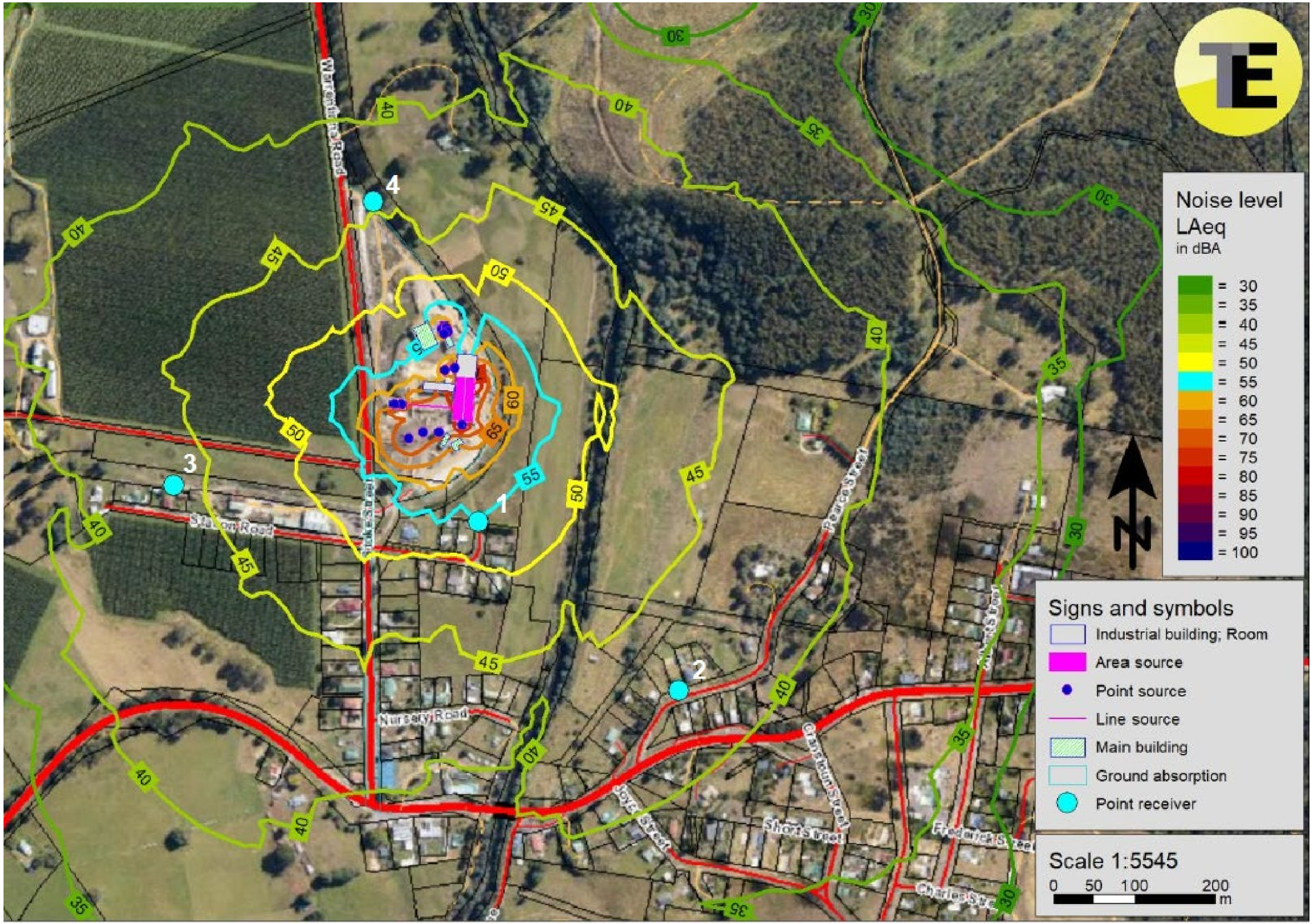

Figure 5: Predicted existing noise emission contours under ISO 9613 (Figure 4-7 of Appendix 3 to the Supplement)

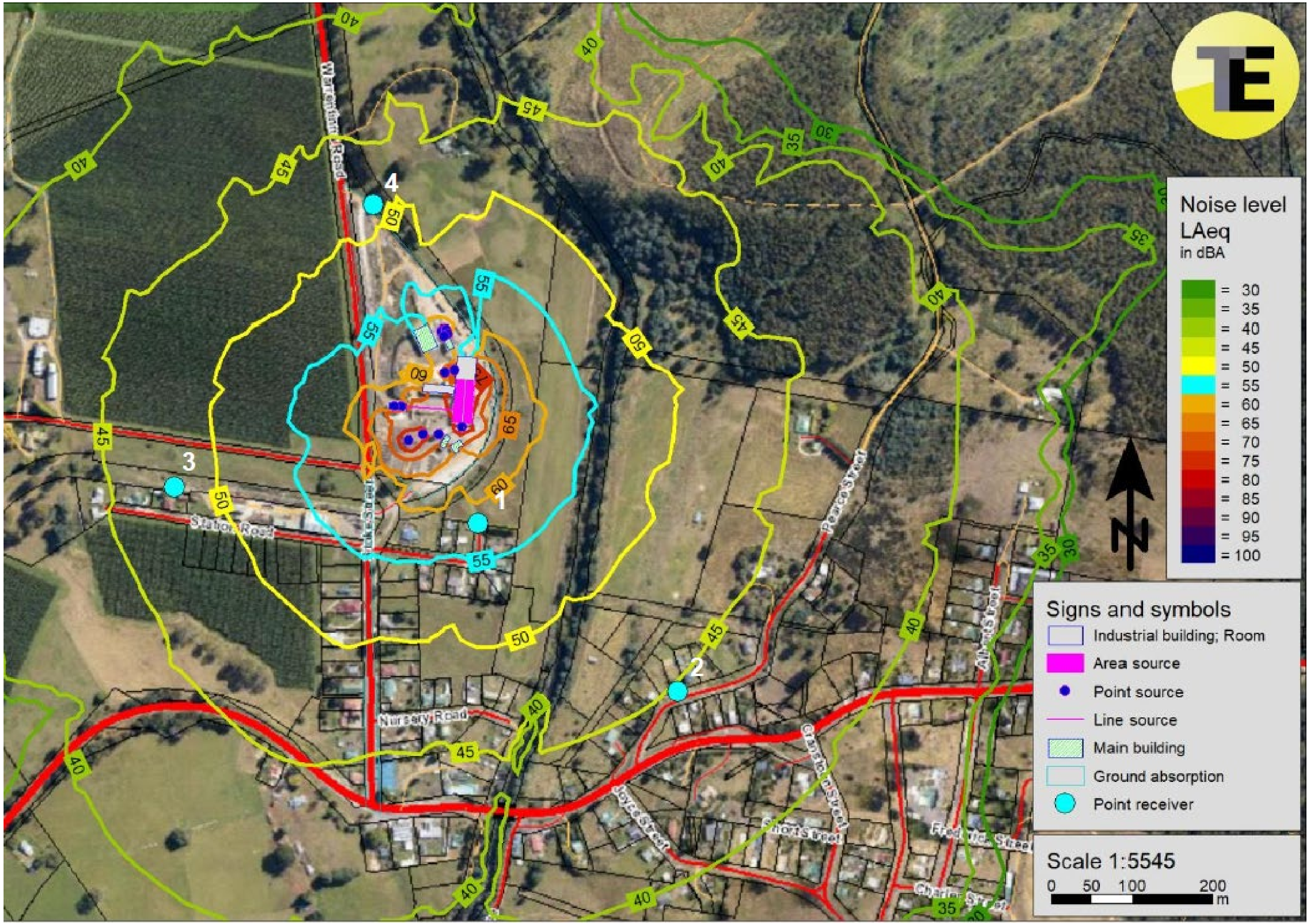

Figure 6: Predicted existing noise emission contours under CONCAWE (Figure 4-8 of Appendix 3 to the Supplement)

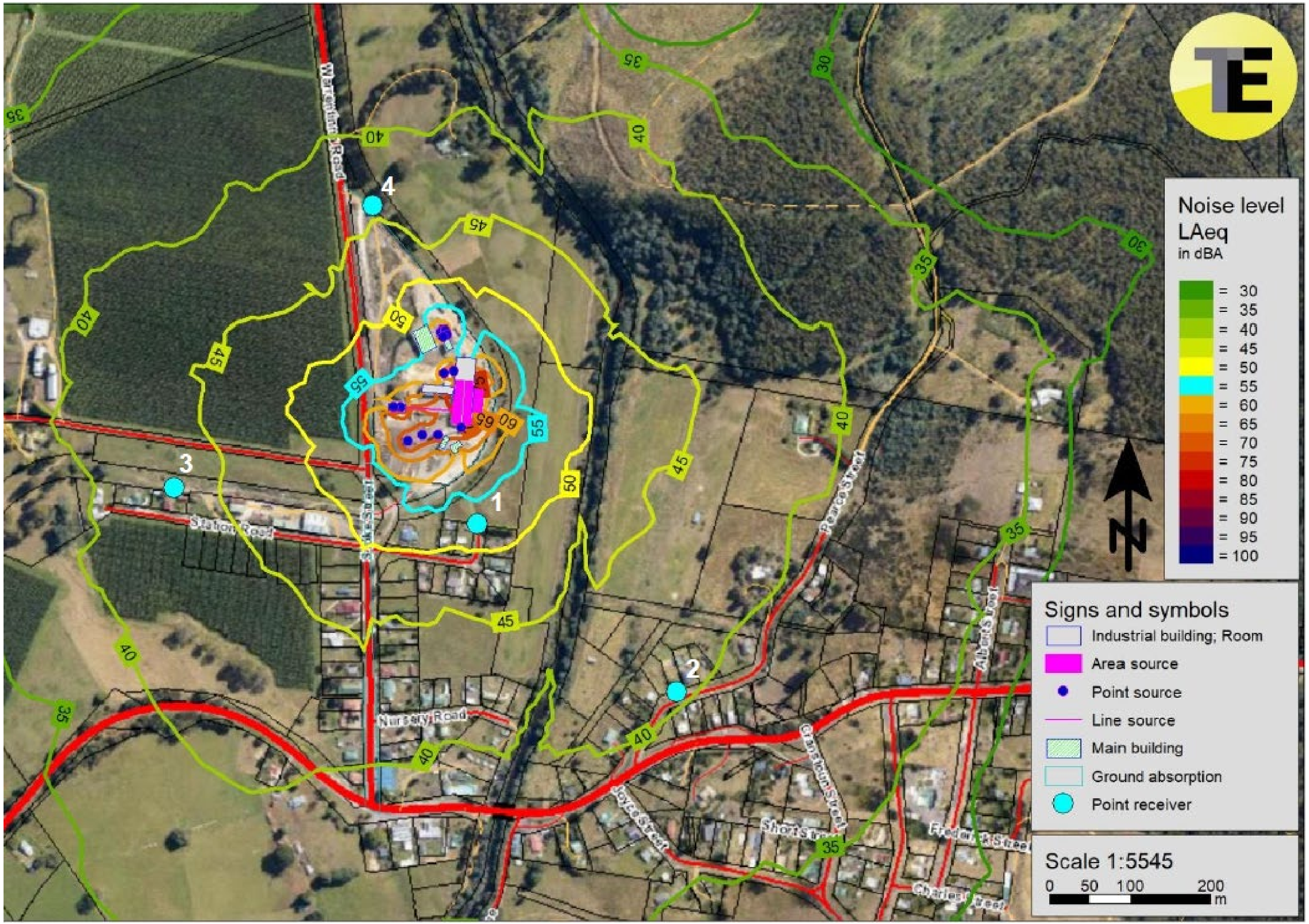

Figure 7: Predicted existing and new noise emission contours under ISO 9613 (Figure 4-9 of Appendix 3 to the Supplement)

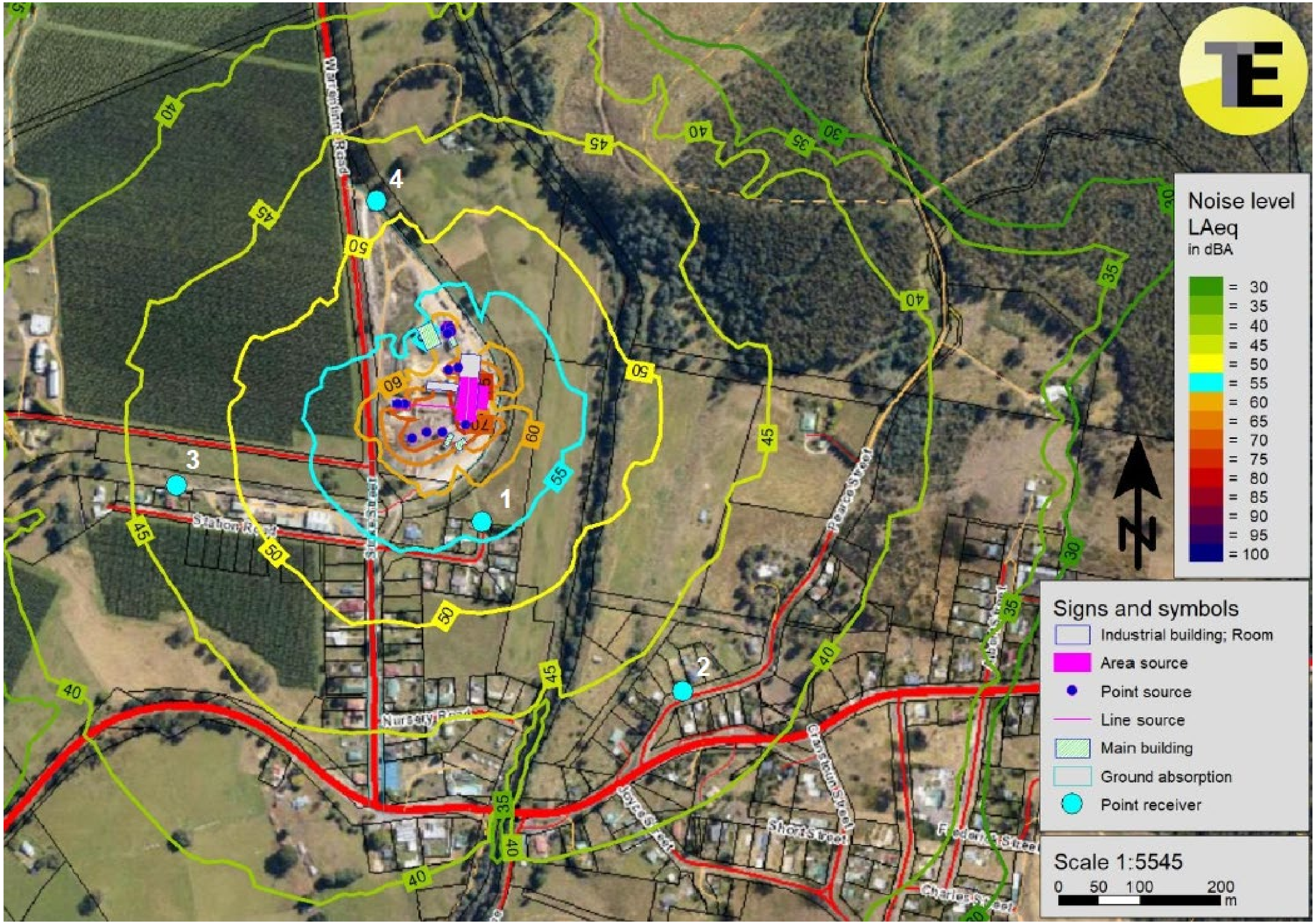

Figure 8: Predicted existing and new noise emission contours under CONCAWE (Figure 4-10 of Appendix 3 to the Supplement)

The observed and unobserved measurements undertaken during the EPA survey in May 2024 suggest that the nighttime noise emissions from the activity are less than 40dB(A) and there did not appear to be any dominant, intrusive or tonal characteristics during nighttime measurements.

Appendix 3 to the Supplement also models the predicted noise emissions from increased heavy vehicle movements during daytime (0700-1800). Sound power levels for low-speed heavy vehicles were sourced from library data, and the modelling assumes:

- four heavy vehicle movements per hour for existing operations and eight heavy vehicle movements for operations following the production increase;
- that all heavy vehicles are travelling at 40 km per hour and traversing from the northern end of the activity to the intersection between Stoke Street and the Tasman Highway;
- a facade correction of + 2.5 dB in accordance with the *New South Wales Road Noise Policy*[4]; and
- a ground absorption coefficient for the road surface of 0.3.

The results of the modelling indicate that noise emissions from heavy vehicle movements associated with the existing operation range between 40 and 47dB(A) in $L_{Aeq,\ 1hr}$ at residences along Stoke Street and under increased production, this will increase to between 44 and 50 dB(A) in $L_{Aeq,\ 1hr}$..

Appendix 3 to the Supplement models the cumulative noise emissions from operations on The Land and increased heavy vehicle movements during daytime (0700-1800) using the ISO 9613 algorithm. The modelling assumes one heavy vehicle movement every ten minutes for existing operations and two heavy vehicle movements every ten minutes following the production increase. The results of the modelling indicate that cumulative noise emissions from operations on the Land and heavy vehicle movements associated with the existing operation range between 48 and 53dB(A) in $L_{Aeq,\ 10mins}$ at residences along Stoke Street and under increased production, this will increase to between 50 and 53 dB(A) in $L_{Aeq,\ 10mins}$.. Noise contours for cumulative noise emissions from operations on The Land and increased heavy vehicle movements during daytime (0700-1800) under existing and new modelling scenarios are presented in Figures 9 and 10 below.

[4] New South Wales Department of Environment, Climate Change and Water, (2011), *New South Wales Noise Policy*, New South Wales Department of Environment, Climate Change and Water; Sydney, New South Wales

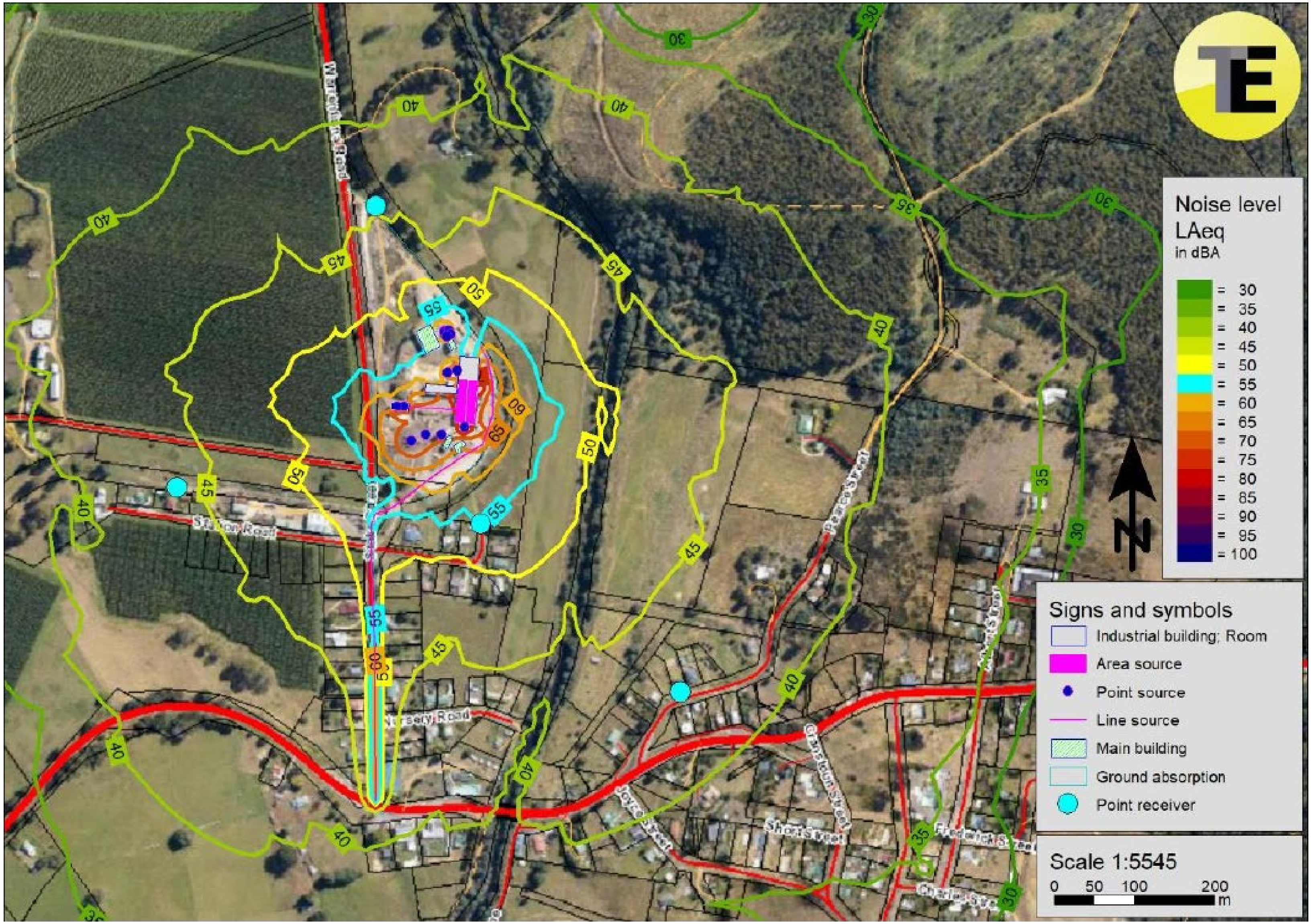

Figure 9: Predicted existing cumulative (operations and heavy vehicle traffic) noise emission contours under ISO 9613 (Figure A-1 of Appendix 3 to the Supplement

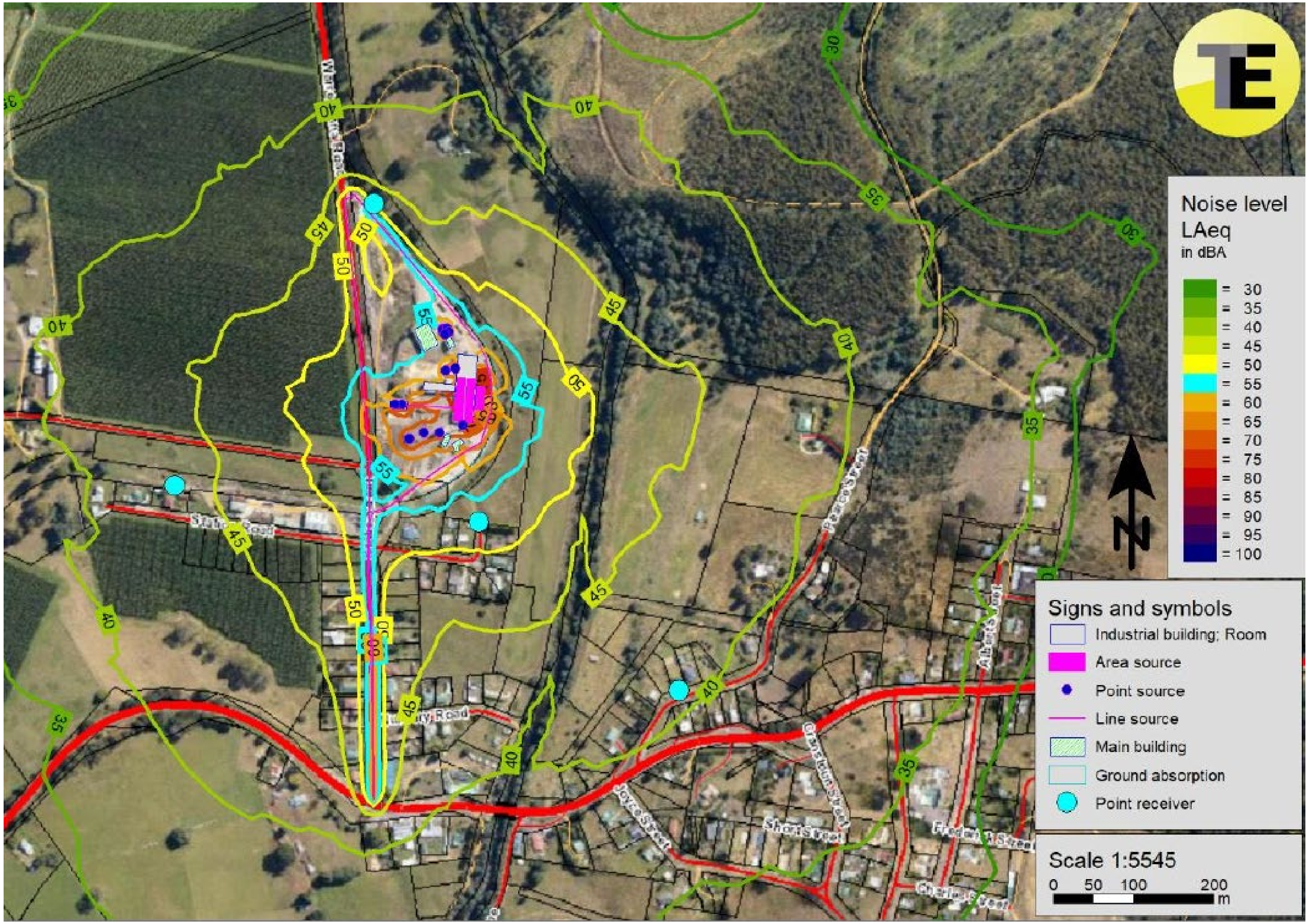

Figure 10: Predicted existing and new cumulative (operations and heavy vehicle traffic) noise emission contours under ISO 9613 (Figure A-2 of Appendix 3 to the Supplement

6.4.2 Management measures proposed in EER

The EER commits to undertake a noise survey post commissioning of the new building and sawmill line. The EER then goes on to state that if the results of the noise survey show the site is exceeding the 55 dBA day-time limit at the most exposed noise sensitive premise, noise attenuation measures will be implemented until the criteria is met. In addition, the EER commits to lining the eastern and southern walls of the new building with 6mm compressed fibre cement. The Supplement also commits to lining the eastern wall of the existing building, to the south of the new building, with 6mm compressed fibre cement.

The EER also includes the following proposed mitigation measures for noise emissions associated with traffic:

- contractors engaged to cart product for the Branxholm Sawmill will be professional contractors with late model well maintained trucks with proprietary exhaust silencers fitted;
- the cartage task will be undertaken during normal sawmill operating hours, which for most of the year will be during daylight hours;
- cartage contractors will be instructed to refrain from using exhaust brakes near residences; and
- the low gradient and sealed surface will cause the trucks to be under low load which will reduce the amount of noise emitted from laden trucks delivering to the site.

6.4.3 Public and agency comment

No public representations or agency submissions were received in relation to noise emissions.

6.4.4 Evaluation

The commitments in the EER and Supplement to line walls of the existing and new building, and to mitigate noise emissions associated with traffic are supported.

The EER and Supplement argue that the predicted noise emissions from the proposal can meet the criteria in the existing Permit, namely 55 dB(A) between 0700 hours and 1800 hours (daytime) and 40 dB(A) between 1800 hours and 0700 hours (night time). However, this is not in accordance with the Noise Policy and therefore does not demonstrate that appropriate noise limits are being achieved at noise sensitive premises. It is noted that the most common daytime noise level set by the EPA on industrial activities is 45 dB(A) to avoid causing nuisance and that in accordance with the levels set in Table 1 of the Noise Policy, L_{Aeq}, 55 dB(A) has potential to cause serious annoyance in outdoor living areas. The daytime noise emissions from the existing operation exceed the existing noise limits and it is concerning that the activity is creeping up in noise level, despite the expectation communicated to the proponent in 2018 that noise levels should be reduced.

The results of noise survey measurements from 2024, and the noise modelling, indicate that the night-time noise emissions from the subject site are unlikely to cause nuisance to the surrounding receivers. However, analysis of the results of the noise survey measurements from 2013, 2018 and 2024, and the noise modelling, indicates that in relation to daytime noise emissions:

- the existing site's noise emissions have remained unchanged for almost eleven years, despite the submission of the Noise Management Plan in 2018;
- noise impacts from the proposal are highest at the closest noise sensitive premises at Edwards Place;
- the predicted daytime noise levels under the 'new operations' scenario, which only considers noise emissions from the new profiling gang sawmill line and building, range from 39 dB(A) to 45 dB(A);
- the predicted daytime noise levels under the cumulative 'existing and new operations' scenario, which considers both noise emissions from the existing operations as well as the from the new profiling gang sawmill line and building, range from 53 dB(A) to 57 dB(A);

- the measurements taken in 2018 are likely not representative of worst-case scenario noise emissions because the de-barker was not operational during the survey. Notwithstanding this, the measurements still recorded a 3dB exceedance above the daytime noise limit of 50dB(A); and
- neither of the predicted noise levels at the noise sensitive premises at Pearce Street under the 'existing operations' scenario (45 dB(A) for the CONCAWE algorithm and 42 dB(A) for the ISO 9613 algorithm) are consistent with the measurements taken by the EPA in 2024 (53 dB(A)), the proponent's consultant in 2018 (53 dB(A)), the proponent's consultant in 2014 (51 dB(A)), and the proponent's consultant in 2013 (57 dB(A)).

Appendix 3 to the Supplement states that the CONCAWE algorithm under the 'existing operations' scenario over predicts by 5dB at Edwards Place (58 dB(A)) when compared to the results of the 2018 survey (53 dB(A)), and that the noise assessment has therefore adopted the ISO 9613 algorithm predictions for the 'existing operations' scenario at this noise sensitive premise (54 dB(A)) instead. It is noted however, that the CONCAWE algorithm prediction for 'existing operations' at Edwards Place (58 dB(A)) is consistent with the measurements taken by the proponent's consultant in 2013 (57 dB(A)) and by the EPA in 2024 (57 dB(A)), which indicate an exceedance of 3dB above the current noise limit of 55dB(A).

The modelled noise predictions should not have been validated by referencing the 2018 survey data, as has been done in the EER and Supplement as the debarker was not operating at the time of the survey. In addition, the conclusion in Appendix 3 to the Supplement that the predicted cumulative noise emission level at Edwards Place is within the current day-time limit of 55dB(A) is not supported because worst-case CONCAWE algorithm modelling and recent survey measurements show exceedances of 55dB(A). As such, the implementation of appropriate mitigation measures to attenuate noise at this receiver is recommended.

Prior to 2018, the daytime noise limit for the activity was 50 dB(A) and increasing this limit to 55dB(A) was conditional on all efforts being undertaken by the proponent to reduce noise wherever practicable in accordance with section 12(2) of the Noise Policy. Although finished timber racks were stored along the southern boundary of the site as a noise attenuation measure in accordance with the commitment made in the Noise Management Plan submitted in 2018, it seems that no further efforts have been made since to reduce noise. In accordance with the *Environmental Guidelines for Wood Processing* (**EGWP**),[5] the use of vegetation as a noise barrier, as suggested in the Noise Management Plan submitted in 2018, is ineffective and it is therefore not supported. The proponent has also indicated in email correspondence, that they are unwilling to consider the installation of a shipping container noise barrier along the southern boundary of the site on the basis that their ISO 9613 algorithm modelling suggests that the site will not exceed the current daytime noise limit of 55dB(A) at the nearest noise sensitive premises on completion of the construction of the new profiling gang sawmill line and building.

While it is acknowledged that parts of the existing and new buildings will be lined internally with 6mm compressed fiber cement and are therefore likely to attenuate noise to some extent at the noise sensitive premises at Edwards Place and Pearce Street, worst-case CONCAWE algorithm modelling still shows an exceedance of 3dB(A) above the current noise emission limit at Edwards Place under the 'existing and new operations' scenario.

It will be difficult for the proponent to reduce noise emissions immediately, and as such condition **N1** maintains the existing daytime noise emission limit of 55dB(A) and night-time noise emission limit of 40dB(A) for three years from the date on which the conditions take effect, unless otherwise approved in writing by the Director. However, to ensure that the proponent will commit to ongoing noise emission reductions in line with best practice environmental management and section 12(2) of the Noise Policy:

- condition N1 reduces the daytime noise emission limit from 55dB(A) to 50dB(A) after three years, unless otherwise approved in writing by the Director; and

[5] Environment Protection Authority (2018) *Environmental Guidelines for Wood Processing*, Environment Protection Authority; Hobart, Tasmania.

- condition **N2** requires the proponent to provide a Noise Reduction Plan within six months after the conditions take effect, and six months prior to the reduced noise emission limit of 50dB(A) taking effect in accordance with condition N1.

Condition N2 requires the Noise Reduction Plan to:

- have the aim of reducing the existing day time noise emissions from the activity to below 50dB(A) by implementing reasonable and practical noise attenuation and mitigation measures and mitigating any intrusive or dominant characteristics;
- be informed by noise surveys undertaken in accordance with conditions N4 and N5; and
- include details of the options available for reducing noise emissions and prioritised actions to achieve the aim of the Noise Reduction Plan, as well as a timetable for implementation and completion of those actions.

Condition **N3** requires the proponent to provide a Noise Report within six months of completion of commissioning. The Noise Report must demonstrate that noise emissions from the new building and profiling gang sawmill line, when measured at noise sensitive premises, do not exceed 40dB(A). This requirement is in accordance with the modelling undertaken by the proponent which predicted noise emissions of 39 dB(A) (ISO 9613 algorithm) at the nearest sensitive receiver under the 'new operations' scenario. In addition to ensuring that the new building and profiling gang sawmill line will not increase cumulative noise emissions from the activity, the Noise Report will also ensure that the building works are undertaken in accordance with the assumptions made in the noise modelling. To achieve this, condition N3(3) requires the Noise Report to provide the sound power levels and locations of all relevant noise emitting equipment on site and provide the results of a noise survey undertaken in accordance with conditions N4 and N5 that shows the cumulative noise emissions from standard and worse case operating conditions at the nearest noise sensitive premises.

The commitment to undertake a noise survey is supported and provided for in condition **N4**. In addition to undertaking a noise survey to inform the Noise Report and Noise Reduction Plan required by conditions N2 and N3, condition N4 requires the proponent to complete a noise survey recurrently, with no longer than two years since the previous survey. This will ensure that noise surveys are undertaken regularly. Condition **N5** outlines standard noise survey method and reporting requirements. Condition N5(4) requires a noise survey report to be prepared unless otherwise approved by the Director in writing. This will ensure that the proponent will not be required to submit a report in accordance with condition N5(4) where the results of the noise survey undertaken in accordance with condition N4(1.1) have already been included in the Noise Report required by condition N3 (3.3) or the Noise Reduction Plan required by condition N2 (2).

Condition **N6** requires reasonable care to be taken to avoid the dropping of logs from height, and condition **N7** retains the existing operating hours of 0700 to 1800 hours, Monday to Saturday for the activity, and for the gas-fired kiln which is permitted to operated twenty-four hours a day, seven days a week. In addition, condition **N8** restricts the hours of operation of chainsaws powered by internal combustion engines to between 0700 and 1800 hours, Monday to Saturday.

Conditions **N9** is also imposed to ensure that noise complaints are reported to the Director of the EPA within 24 hours, even when those complaints are able to be resolved with the community directly.

Condition **G7** is a minimum annual reporting requirement for most permitted activities however, it is rarely imposed for level 2A activities. In this case, condition G7 is considered necessary to ensure that the Director, EPA and the public are informed about the environmental performance of the activity, and noting that noise emissions from the existing operation do exceed the existing noise limits at times. The potential for a condition to be included in any further approval for the site requiring the proponent to submit an Annual Environmental Review was discussed with the proponent during a site visit on 13 September 2023.

6.4.5 Conditions

The proponent will be required to comply with the following conditions:

- **N1** Noise emission limits
- **N2** Noise Reduction Plan
- **N3** Noise Report
- **N4** Noise survey requirements
- **N5** Noise survey method and reporting requirements
- **N6** Log drops
- **N7** Operating hours
- **N8** Chainsaw operation
- **N9** Noise complaints
- **G7** Annual Environmental Review

6.5 Issue 4: Natural Values

6.5.1 Description and potential impacts

If not managed appropriately, activities associated with the operation of a sawmill have the potential to:

- impact aquatic threatened fauna species through the release of sediments causing habitat degradation;
- increase the risk of injury or death of threatened fauna species due to the movement of vehicles on and off-site, particularly during the night-time period; and
- otherwise disturb, injure, or kill threatened fauna or flora species and vegetation communities.

The EER states that The Land is comprised of the existing sawmill area, and associated infrastructure including stockpiles, bunkers, drains, settlement ponds, manufacturing areas and internal access roads. The Land is surrounded by the town of Branxholm to the south and east, and agricultural areas to the west and north. There also two remnant patches of threatened native vegetation communities (*Eucalyptus ovata* forest and woodland (TasVEG code: DOV) and *Eucalyptus viminalis* wet forest (TasVEG code: WVI)) within 1,000 m of the Land, near the upstream riparian areas of Ledgerwood Rivulet and the Ringarooma River.

The EER states that the proposal will not involve any vegetation clearing. Natural values surveys were not required by the EER Guidelines for the proposal and were therefore not undertaken by the proponent. Although desktop analysis revealed no records of threatened species on The Land, there are records of the following threatened fauna species within 5,000m of The Land:

- giant freshwater crayfish (*Astacopsis gouldi*);
- spotted-tailed quoll (*Dasyurus maculatus* subsp. *maculatus*);
- eastern quoll *(Dasyurus viverrinus)*;
- eastern barred bandicoot (*Perameles gunnii)*;
- Tasmanian devil (*Sarcophilus harrisii)*;
- wedge-tailed eagle *(Aquila audax* subsp. *fleayi*);
- green and gold frog (*Litoria raniformis*);
- grey goshawk (*Accipter novaehollandiae*);
- hydrobiid snail (Scottsdale) (*Beddomeia minima*);
- Fern Creek freshwater snail (*Beddomeia briansmithi*); and
- white-throated needletail (*Hirundapus caudacutus*).

In particular, of those threatened species listed above, the following observations have been recorded within 500m of the development activity: giant freshwater crayfish (*Astacopsis gouldi*), green and gold frog (*Litoria raniformis*), Tasmanian wedge-tailed eagle (*Aquila audax* subsp. *fleayi*) and grey goshawk (*Accipter *novaehollandiae*). There are also five Tasmanian wedge-tailed eagle (*Aquila audax* subsp. *fleayi*) nests between 1,300m and 4,800m, and a grey goshawk (*Accipter novaehollandiae*) nest 830m from the site.

6.5.2 Management measures proposed in EER

The EER states that no specific avoidance or mitigation measures are proposed in relation to natural values.

6.5.3 Public and agency comment

No public representations were received in relation to natural values. Conservation Assessment Section (CAS) within NRE Tas provided comments during the public advertising period indicating its support for the findings in the EER related to natural values.

6.5.4 Evaluation

Based on the information provided in the EER, there appears to be limited natural values on, and immediately surrounding, The Land. It is noted that The Land is an already disturbed site which has been operating as a sawmill for a significant period of time. In addition, no vegetation clearance will be undertaken as part of the proposal. The main risks from the proposal will be management of water (e.g. pollution of waterways from sediments, oils/fuels and other chemicals used if spilled etc.) and the risks to wildlife associated with vehicle movements. The risk of otherwise disturbing, injuring or killing threatened species or native vegetation communities from the operation of the activity under increased production appears to be low.

Roadkill

The EER states that the proposal will not change the volume of light vehicle traffic that is currently generated by the activity however, increases are expected in heavy vehicle movements during existing daytime operating hours (0700-1800). Specifically, it is predicted that the proposal will result in an increase of average heavy vehicle movements from 24 vehicles per day at present to 48 vehicles per day.

The EER also states that:

- 90% of heavy vehicles will enter and leave the site by travelling via Stoke Street and the Tasman Highway and the remaining 10% of heavy vehicles will enter and leave the site travelling via Warrentinna Road.
- Stoke Street has a default speed limit of 60km per hour and as it runs through the town of Branxholm, it is unlikely to be preferred habitat for spotted-tailed quoll (*Dasyurus maculatus* subsp. *maculatus*), eastern quoll *(Dasyurus viverrinus)* or Tasmanian devil (*Sarcophilus harrisii)*.
- There are a number of sightings and roadkill records of spotted-tailed quoll (*Dasyurus maculatus* subsp. *maculatus*), eastern quoll *(Dasyurus viverrinus)* and Tasmanian devil (*Sarcophilus harrisii)* on the parts of the Tasman Highway that are within 5,000m of the Land however, there is only one sighting of a spotted-tailed quoll (*Dasyurus maculatus* subsp. *maculatus*) on Warrentinna Road and no sightings of any of these three species on Stoke Street (see Table 22 in the EER).
- Based on the Traffic Impact Assessment included as Appendix 3 to the EER, during winter the proposal may result in one additional heavy vehicle movement each day within nighttime hours as defined in the NRE Tas *Survey Guidelines and Management Advice for Development Proposals that May Impact the Tasmanian Devil (Sarcophilus harrisii)*.[6]

The EER concludes that the risk of injury or death of threatened fauna species due to the movement of vehicles on and off-site during the night-time period because of the proposal is negligible. This finding was supported by the CAS.

[6] Department of Natural Resources and Environment Tasmania (2023) *Survey Guidelines and Management Advice for Development Proposals that May Impact the Tasmanian Devil (Sarcophilus harrisii)*, Department of Natural Resources and Environment Tasmania; Hobart, Tasmania.

Aquatic fauna

The EER notes that there is potential habitat for the giant freshwater crayfish (*Astacopsis gouldi*) in the Ledgerwood Rivulet and Ringarooma River. Given that the activity site sits 600m south of the confluence of these two waterways, and eventually discharges to the Ledgerwood Rivulet, the EER concludes that the proposal has the potential to impact on habitat for this species. Advice from CAS indicates that the Ledgerwood Rivulet and Ringarooma River also contain potential habitat for green and gold frog (*Litoria raniformis*), hydrobiid snail (Scottsdale) (*Beddomeia minima*), and Fern Creek freshwater snail (*Beddomeia briansmithi*), and as such, these species may also be impacted by the proposal.

The EER goes on to state that the existing stormwater management system is sufficient to mitigate the risk of impacts to the giant freshwater crayfish (*Astacopsis gouldi*) as stormwater from the sawmill is captured and treated prior to being discharged into a roadside drain and then the Ledgerwood Rivulet. Advice from the CAS suggests that the existing stormwater management system is also likely to be sufficient to mitigate the risk of impacts to the other threatened aquatic fauna outlined above. In addition, the EER:

- commits to installation of a skimmer in the sediment pond, such as the Dolphin Floating Strainer or a similar skimmer to Figure B29 of Appendix B to *Best Practice Erosion and Sediment Control*,[7] and making a boom available to deploy in the case of an accidental spill; and
- otherwise demonstrates that the handling of hazardous substances is in accordance with best practice measures (see Issue 6).

The EER states that no specific avoidance or mitigation measures are proposed in relation to natural values. The statements made in the EER are generally supported and no conditions specific to natural values are considered necessary. However, conditions relating to water quality (see Issue 2) and hazardous substances (see Issue 6) are considered relevant and will help manage any potential risks to the limited natural values on and surrounding the Land.

6.5.5 Conditions

Conditions relating to water quality (see Issue 2) and hazardous substances (see Issue 6) are considered relevant and will help manage any potential risks to the limited natural values on and surrounding the Land. No additional conditions relating to natural values are considered necessary.

6.6 Issue 5: Weeds and pathogens

6.6.1 Description and potential impacts

The EER states that the sawmill receives logs from various plantation sites in the northeast of Tasmania via trucks that frequently travel along forestry and rural roads. The movement of vehicles, plant, and equipment on and off-site therefore has the potential to introduce or spread weeds and pathogens if not managed appropriately. Stockpiles may also be contaminated with weeds which may then be transported to other areas.

The EER states that The Land is comprised of the existing sawmill area, and associated infrastructure including stockpiles, bunkers, drains, settlement ponds, manufacturing areas and internal access roads. The Land is surrounded by agricultural areas to the west and north.

The EER states that blackberry (*Rubus fruticosus*), Spanish heath (*Erica lusitanica*), and fennel (*Foeniculum vulgare)* are present within or adjacent to The Land and are either Declared Weeds under the *Biosecurity Regulations 2022* or Weeds of National Significance under the *Environment Protection and Biodiversity Conservation Act 1999*. The EER also states that blackberry (*Rubus fruticosus*) infestations on The Land have been successfully controlled in the past via the application of herbicide and that the surrounding agricultural land is likely to be an ongoing source of weed incursions.

[7] International Erosion Control Association Australasia (June 2018) *Best Practice Erosion and Sediment Control - Appendix B*. International Erosion Control Association Australasia; Picton, New South Wales.

6.6.2 Management measures proposed in EER

The EER commits to minimising the risk of vehicles introducing or spreading weeds and pathogens by regular observation and cleaning of trafficked surfaces to remove dirt and debris. The EER also commits to ongoing control of weeds on The Land via the application of herbicide.

6.6.3 Public and agency comment

No public representations or agency submissions were received in relation to weed and disease management.

6.6.4 Evaluation

It is acknowledged that some weeds have been present on the site in the past, and that ongoing management will be required to ensure that further weed incursion from surrounding agricultural land does not occur. It is also noted that risk of weeds and pathogens being imported to the site from forestry plantations and coupes is adequately mitigated by requirements imposed in Forest Practices Plans and by the Forest Practices Authority in guidelines such as the *FPA Flora Technical Note No. 8: Management of Phytophthora cinnamomi in production forest.*[8] The proponent also has a general duty of care in accordance with the *Biosecurity Act 2019* to take all reasonable and practical measures to prevent, eliminate or minimise biosecurity risks.

The commitments made by the proponent are considered appropriate and the inclusion of condition **OP2,** which requires the Land to be kept substantially free of weeds, will ensure they are implemented to minimise the risk of introducing or spreading weeds.

6.6.5 Conditions

The proponent will be required to comply with the following conditions:

- **OP2** Weed management

6.7 Issue 6: Waste Management, Dangerous Goods and Environmentally Hazardous Substances

6.7.1 Description and potential impacts

Wastes from the activity can escape into the surrounding environment, causing environmental nuisance or harm if not suitably stored or disposed of. Inappropriate storage, handling and disposal of environmentally hazardous substances including fuels and oils, has the potential to contaminate soil, surface water and groundwater.

The EER identifies six main waste streams from the activity namely, sawmill residues, operational waste, construction waste, excavation spoil, general refuse and septic waste.

The proposal will result in an overall increase in sawmill residues in the form of woodchips (from 12,800 to 25,893 tonnes per year), sawdust (from 6,400 to 11,607 tonnes per year) and bark (from 800 to 1,785 tonnes per year). The EER states that because demand for these sawmill residues currently outstrips supply, the increase in production can be managed within the available storage capacity. However, the increase in production will necessitate the existing chip bin, which has a storage capacity of $80m^3$, to be replaced with a higher capacity bin of up to $220m^3$ storage capacity.

The EER states that operational waste will be generated by the proposal in the form of spent parts for machinery and equipment. Waste will also be generated in connection with the construction of the new sawmill line, including packaging, as well as equipment and infrastructure that is being decommissioned or demolished. The construction of the new sawmill line building will also generate approximately $31m^3$ of

[8] Forest Practices Authority 2022, 'Management of Phytophthora cinnamomi in production forest', Flora Technical Note No. 8, Forest Practices Authority, Hobart.

excavation spoil, with a significant part of the site mapped as low probability inland acid sulphate soils (**ASS**). The EER also states that the proposal will generate general refuse, including litter, and septic waste.

There are some potential sources of controlled wastes that may be generated from the activity, primarily from spills of hydrocarbon-based products during refuelling or maintenance works, tyres if replacement is required, and the empty containers associated with the chemicals used.

The use of hazardous substances is also required at the site. Fuels, oil and LPG are used to operate and maintain machinery. Table 18 of the EER lists the quantities and storage methods for the environmentally hazardous substances which include 2,000 litres of diesel stored in an above ground storage tank, 10,000 litres of LPG stored in two 5,000 litre above ground tanks and 1,200 litres of oil stored in an oil store and pallets.

6.7.2 Management measures proposed in EER

The EER states the following measures will be implemented to manage waste and minimise the risk of harm from waste or environmentally hazardous substances:

- efficiencies associated with the new sawmill line will increase the amount of sawn timber able to be recovered as a percentage of log input (50% to 56%), and therefore reduce the amount of sawmill residues as a percentage of log input (32% to 29% for woodchips and 16% to 13% for sawdust);
- although sawmill residues are identified as a waste stream in the EER, the proponent sells these residues as marketable products;
- the proposal does not include an increase in the current capacity of the sawdust bunker and bark bunker and as such, there is no plan to increase the amount of sawdust or bark stored on The Land;
- the existing woodchip bin will either be transferred to another one of the proponent's manufacturing facilities or sold;
- operational and construction waste will be repurposed wherever possible, or otherwise categorised, recycled and/or disposed of by a registered waste disposal contractor;
- excavated spoil will be tested for ASS potential before construction commences;
- if ASS testing shows the soil at the depth of the proposed excavation is potential ASS an ASS Management Plan will be prepared and implemented, and the soil will be neutralised before being utilised on site for landscaping;
- septic waste is managed via a septic tank and soakage field;
- the above ground diesel storage tank is fully bunded;
- mobile equipment is refuelled from a fully bunded refuelling facility and oil and hydraulics are stored on a concrete pad in a separate storage shed;
- the refuelling facility and storage shed have impervious concrete floors that drain to a triple interceptor trap;
- a hydrocarbon spill kit and boom are retained on site for deployment in the event of an accidental spill or leak; and
- the new sawmill line will not be constructed on the part of the site that was previously used as a quarry, as the former quarry pit was filled with waste and covered with soil. This will ensure that waste material is not required to be excavated or otherwise disturbed.

6.7.3 Public and agency comment

No public representations or agency submissions were received in relation to waste management, dangerous goods, or environmentally hazardous substances.

6.7.4 Evaluation

Based on the information provided in the EER, the management measures proposed and the inclusion of appropriate conditions as outlined below, it is considered that the potential risks from waste, dangerous goods and environmentally hazardous substances can be appropriately managed to limit the potential for environmental harm or nuisance to occur.

Condition **H1** requires appropriate spill kits to be kept on The Land and maintained in a functional condition. Condition **H2** requires hazardous materials to be contained and managed appropriately to prevent contamination of soil, groundwater, and waterways. The commitments in relation to testing and management of ASS is supported. To reflect these commitments, condition **OP3** requires soil sampling results to be provided to the Director prior to excavation commencing and outlines requirements for the provision of an ASS Management Plan.

Standard information items **LO2, L03, O11** and **O12** are included to ensure the proponent is aware of legislation relating to storage and handling of dangerous goods and substances, controlled waste transport and best practice in relation to waste management and the environmental impacts of wood processing.

Although the activity is primarily a wood processing facility under 2(g) of Schedule 2 of EMPCA, it is noted that the production of woodchips for export from offcuts and dockings is also considered a 'level 2 activity' under clause 2(i), Schedule 2 of EMPCA as it involves the processing of trees or parts of trees to form woodchips with a production capacity of 1,000 tonnes or more per year. Given that the chipper is identified in the EER and Supplement as a major existing noise source, it is considered appropriate to impose a separate regulatory limit for woodchips in condition **Q1**. The imposition of a separate production limit for woodchips is supported by the EPA Regulatory Officer. Although the EER specified an annual tonnage of woodchips of approximately 25,900 tonnes, comments provided to the Board by the proponent on 24 September 2024 indicated that a limit of 25,900 tonnes would restrict the ability of the proponent to handle low quality feedstock, smaller diameter logs, manual sawing and special orders. As such, it is considered reasonable to impose a limit of 50,000 tonnes per annum of woodchip.

6.7.5 Conditions

The proponent will be required to comply with the following conditions:

- **Q1** Regulatory limits
- **H1** Spill kits
- **H2** Storage and handling of hazardous materials
- **OP3** Management of Acid Sulphate Soils

Other information included in the permit:

- **LO2** Waste and Resource Recovery Act 2022 obligations
- **LO3** Controlled waste transport
- **O11** Environmental Guidelines for Wood Processing
- **O12** Waste management hierarchy

6.8 Issue 7: Site Contamination

6.8.1 Description and potential impacts

CCA timber preservation activities occurred on the site until 1993, as shown in Figure 2 above (Figure 3 of the EER). Disturbance of this area associated with the construction of the new sawmill line building therefore has the potential to contaminate soil, surface water and groundwater if not managed appropriately. The proposal may also cause contaminants to escape into the surrounding environment, causing environmental nuisance or harm.

6.8.2 Management measures proposed in EER

The EER states that the location of the new building avoids parts of the site on which CCA timber preservation activities were previously conducted, and that construction of the new building will not require piling. Given that water bores indicate that groundwater is between 2 and 2.4 metres below natural ground level, and the proposed construction method will not cause significant ground disturbance, groundwater is unlikely to be intersected during construction of the new building.

6.8.3 Public and agency comment

No public representations or agency submissions were received in relation to site contamination.

6.8.4 Evaluation

The risk of exposing CCA contaminated soils is mitigated by locating the new building away from the area on which CCA timber preservation activities were previously conducted. This is supported. Condition **OP1** prevents disturbance of the area on which CCA timber preservation activities were previously conducted unless otherwise approved in writing by the Director.

In addition, it is noted that following cessation of CCA timber preservation activities at the site in 1993, ground water monitoring was undertaken in accordance with the conditions of the existing Permit (PCE No. 8663). In 2011, the groundwater monitoring requirement was removed from the Permit in consultation with the EPA Water Specialist as the monitoring undertaken demonstrated that groundwater contamination had not occurred and/or was unlikely to occur.

6.8.5 Conditions

The proponent will be required to comply with the following condition:

- **OP1** Copper Chromium Arsenate area

6.9 Issue 8: Decommissioning and Rehabilitation

6.9.1 Description and potential impacts

Temporary or permanent cessation of sawmill operations has the potential to cause ongoing impacts to the environment if it is not managed appropriately. Rehabilitation may be necessary to ensure the long-term stability of the site, prevent erosion and sedimentation, reduce uncontrolled dust emissions, and minimise the potential for establishment of weeds.

6.9.2 Management measures proposed in EER

The EER states that the entire site is 3.9 hectares and this whole area will remain unrehabilitated under increased production. The EER states that in the event of permanent cessation of the sawmill, the proponent would sell any remaining logs, timber, products and residues, and dismantle and sell equipment and machinery. The intention is the site would then be sold with buildings intact to be used for industrial purposes.

6.9.3 Public and agency comment

No public representations or agency submissions were received in relation to decommissioning and rehabilitation.

6.9.4 Evaluation

Although the EER does not detail the rehabilitation works that may be required following decommissioning, it is noted that the site will be used for an alternative industrial purpose and therefore the proposed steps for decommissioning are generally supported.

Condition **DC1** requires the proponent to notify the Director in writing within 30 days of becoming aware of any event or decision that it likely to give rise to permanent cessation of the activity. To ensure that appropriate rehabilitation of the site is undertaken following permanent cessation, condition **DC2** requires the submission of a Decommissioning and Rehabilitation Plan for the Director's approval. Condition **DC3** is also triggered by permanent cessation of the activity and sets out the broad steps that must be undertaken to rehabilitate the site, including the implementation of an approved DRP. Condition **DC4** sets out the requirements for temporary cessation of the activity.

Based on the commitments made in the EER and the above conditions being imposed, it is considered that the risks associated with improper decommissioning and rehabilitation can be adequately managed to ensure environmental harm or nuisance is unlikely to occur upon temporary or permanent cessation of the activity.

6.9.5 Conditions

The proponent will be required to comply with the following conditions:

- **DC1** Notification of cessation
- **DC2** Decommissioning and Rehabilitation Plan requirements
- **DC3** Rehabilitation following cessation
- **DC4** Temporary suspension of activity

7. Issues not assessed by the Board

The following issue has been raised during the assessment process but is not the responsibility of the Board under the EMPCA and may be an issue which is more appropriately addressed by another regulatory agency.

7.1 Issue 1: Electrical infrastructure

7.1.1 Potential impacts

The EER states that the proposal will increase the power requirements for the site and therefore, it will necessitate disconnection and decommissioning of the existing overhead power lines, and installation of a new underground electricity cable and two 2MW transformers. The EER advises that this is not a component of this proposal.

7.1.2 Management measures proposed in EER

The EER states that the environmental impacts of the decommissioning and installation of the powerlines, underground cable and transformers will be managed through a separate Construction Environmental Management Plan (**CEMP**).

7.1.3 Public and agency comment

No public representations or agency submissions were received in relation to electrical infrastructure.

7.1.4 Conclusion

Exemptions under section 57 of the *Electricity Supply Industry Act 1995* apply to the proposed electrical infrastructure because it is considered 'work of minor environmental impact'. This includes:

- the laying, removal, repair, maintenance or modification of any underground cable for the distribution or transmission of electricity;
- the removal, repair, maintenance or modification of existing powerlines for the transmission, distribution or supply of electricity; and
- the removal, repair, maintenance or modification of an existing substation or a transformer associated with the transmission, distribution or supply of electricity.

This means that the electrical infrastructure is not considered development under LUPAA and is therefore outside the remit of the Board. The only concerns that EPA may have with these works would be disturbance of historic CCA contaminated soil, which is addressed by condition **OP1**, and the management of ASS, which is addressed by condition **OP3** and the proponent's commitment to manage the works in accordance with a separate CEMP.

8. Report Conclusions

This assessment has been based on the information provided by the proponent, CMTP Pty Ltd, in the permit application, the case for assessment (the EER), and additional information provided (Supplement).

This report incorporates specialist advice provided by EPA scientific and regulatory staff, the Department of Natural Resources and Environment Tasmania.

It is concluded that:

1. the RMPS and EMPCS objectives have been duly and properly pursued in the assessment of the proposal; and
2. the assessment of the proposal has been undertaken in accordance with the Environmental Impact Assessment Principles; and
3. the proposal is capable of being managed in an environmentally acceptable manner such that it is unlikely that the RMPS and EMPCS objectives would be compromised, provided that the Permit Conditions - Environmental No. 11324 appended to this report are imposed and duly complied with.

The environmental conditions in Appendix 3 are a new set of operating conditions for the entire, intensified activity that will supersede the existing permit conditions.

9. Report Approval

Environmental Assessment Report and conclusions, including environmental conditions, adopted:

MARK GIFFORD

DEPUTY CHAIRPERSON, BOARD OF THE ENVIRONMENT PROTECTION AUTHORITY

Date: 1 November 2024

10. References

CONCAWE *The oil companies' international study group for conservation of clean air and water* – Europe (est. 1963) report 4/81.

Department of Natural Resources and Environment Tasmania (2023) *Survey Guidelines and Management Advice for Development Proposals that May Impact the Tasmanian Devil (Sarcophilus harrisii*), Department of Natural Resources and Environment Tasmania; Hobart, Tasmania.

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International Erosion Control Association Australasia (June 2018). *Best Practice Erosion and Sediment Control - Appendix B*. International Erosion Control Association Australasia; Picton, New South Wales.

Integrated Land Management and Planning (2024) *Branxholm Sawmill Upgrade - Environmental Effects Report* (dated 11 June 2024), CMTP Pty Ltd; Lindisfarne, Tasmania.

Integrated Land Management and Planning (2024) *Branxholm Sawmill Upgrade - Supplement to the* Environmental Effects Report (dated 9 September 2024), CMTP Pty Ltd; Lindisfarne, Tasmania.

ISO 9613-2:1996 Acoustics - *Attenuation of sound during propagation outdoors – Part 2: General method of calculation*.

New South Wales Department of Environment, Climate Change and Water, (2011), *New South Wales Noise Policy*, New South Wales Department of Environment, Climate Change and Water; Sydney, New South Wales

11. Appendices

Appendix 1 Summary of public and agency submissions

Appendix 2 Table of proponent management measures

Appendix 3 Permit Conditions Environmental No: 11324

Appendix 1: Summary of agency submissions

Table 1: Matters raised during public consultation period

Agency	Comments and Issues	Further Information Requested	EPA Comments
Conservation Assessments Section (NRE Tas)	CAS supported the mitigations measures outlined in the EER relating to water quality and hazardous substances and recommended their implementation to avoid impacts on aquatic threatened fauna species from the proposed development. CAS noted that the Branxholm Sawmill is a continuing activity within an already disturbed site and supported the findings in the EER regarding natural values.	No	CAS comments reflected in Environmental Assessment Report and Permit Conditions Environmental No. 11324.

Appendix 2: Table of proponent management measures

Table 1: Proponent management measures (Supplement and Part D of EER)

Number	Action	Timing
Air quality		
1	A number of measures are used on site to minimise dust emissions: • a three-sided bunker which temporarily stores residue sawdust prior to collection; • fully enclosed blower systems; • impeller fans; • a ducted system comprising inlet heads, rigid ductwork and two cyclones; and • loading ramps and designated concrete unloading areas to minimise waste and residue escaping onto the ground.	Ongoing – measures already applied to existing activity
2	Standard measures will be applied to suppress dust on site including: • fitting trucks with tarps; • maintaining slow vehicle speeds of 10km per hour; • using low dust producing road base on internal roads; • frequent turning of residue stockpiles to reduce gas production and prevent composting; • deployment of water sprays using water from the settling pond or domestic water supply during dry and/or windy conditions.	Upon issue of a permit
3	A windsock will be installed to assist the sawmill operator in estimating wind direction to determine when corrective action shall be applied.	Upon issue of a permit
4	The northern junction with Warrentinna Road will be sealed for 20 metres as per Dorset Council and Department of State Growth standard drawings.	Upon issue of a permit
Water quality		
5	A skimmer will be fitted to the inlet pipe to the water transfer pump to ensure the cleanest water is transferred to the perimeter drain.	Upon issue of a permit
6	A length of hydrocarbon boom will be made available for immediate deployment should an oil or fuel spill or leak enter the stormwater management system.	Upon issue of a permit
7	Visual monitoring and maintenance of the log stockpile drain, sediment pond and point of discharge to the perimeter drain	Ongoing – measures already applied to existing activity

Number	Action	Timing
8	Utilising the existing refueling and oil storage facility, to minimise the risk of hydrocarbons being discharged to the environment through	Ongoing – measures already applied to existing activity
Noise emissions		
9	A noise survey will be conducted post commissioning of the upgrade. If the results of the noise assessment show the site is exceeding the 55 dBA daytime limit at the most exposed sensitive receptor, noise attenuation measures will be implemented until the criteria is met.	On completion of commissioning of the upgrade
10	6mm compressed cement sheet lining will be applied to the new building and to the eastern wall of the existing process building south of the new building for the purpose of sound attenuation.	During construction of the upgrade
11	The following management measures will be implemented to minimise the impacts of increased heavy vehicle traffic associated with the upgrade: • trucks delivering logs to the Branxholm Sawmill will be advised to refrain from using engine brakes near residences on Stoke Street; • the cartage task will be undertaken during normal sawmill operating hours, which for most of the year will be during daylight hours; • cartage contractors will be instructed to refrain from using exhaust brakes near residences; and • the low gradient and sealed surface will cause the trucks to be under low load which will reduce the amount of noise emitted from laden trucks delivering to the site.	Upon issue of a permit
Waste management, dangerous goods and environmentally hazardous substances		
12	The following management measures will continue to be implemented: • the above ground diesel storage tank is fully bunded; • mobile equipment is refuelled from a fully bunded refuelling facility and oil and hydraulics are stored on a concrete pad in a separate storage shed; and • the refuelling facility and storage shed have impervious concrete floors that drain to a triple interceptor trap.	Ongoing – measures already applied to existing activity
13	Excavated spoil will be tested for ASS potential before construction commences. If ASS testing shows the soil at the depth of the proposed excavation is potential ASS an ASS Management Plan will be prepared and	Prior to construction of the upgrade

Number	Action	Timing
	implemented, and the soil will be neutralised before being utilised on site for landscaping.	
14	A hydrocarbon spill kit and boom are retained on site for deployment in the event of an accidental spill or leak.	Ongoing – measures already applied to existing activity
15	The new building profiling gang sawmill line will not be constructed on the part of the site that was previously used for CCA treatment or as a quarry.	During construction of the upgrade
Weed management		
16	Trafficked surfaces will be regularly cleaned of dirt and debris to ensure transport vehicles do not pick up weed seed or contaminated soil on site.	Ongoing – measures already applied to existing activity
17	Control of weeds via the application of herbicide.	Ongoing – measures already applied to existing activity
Decommissioning and rehabilitation		
18	In the event of permanent cessation of the sawmill, the proponent would sell any remaining logs, timber, products and residues, and dismantle and sell equipment and machinery. The site would then be sold with buildings intact to be used for industrial purposes.	Upon permanent cessation of the activity

Appendix 3: Permit conditions – Environmental No: 11324

PERMIT PART B
PERMIT CONDITIONS - ENVIRONMENTAL No. 11324

Issued under the *Environmental Management and Pollution Control Act 1994*

Activity: **The operation of a sawmill and woodchip mill (ACTIVITY TYPE: Wood Processing Works)**
BRANXHOLM SAWMILL, 1628 WARRENTINNA ROAD
BRANXHOLM TAS 7261

The above activity has been assessed as a level 2 activity under the *Environmental Management and Pollution Control Act 1994*.

Acting under Section 25(5)(a)(i) of the EMPCA, the Board of the Environment Protection Authority has required that this Permit Part B be included in any Permit granted under the *Land Use Planning and Approvals Act 1993* with respect to the above activity.

Municipality:	**DORSET**
Permit Application Reference:	**PLA/2022/125**
EPA file reference:	**22/8016**

Date conditions approved: 1 October 2024

Signed:

DEPUTY CHAIRPERSON, BOARD OF THE ENVIRONMENT PROTECTION AUTHORITY

DEFINITIONS

Unless the contrary appears, words and expressions used in this Permit Part B have the meaning given to them in **Schedule 1** of this Permit and in the EMPCA. If there is any inconsistency between a definition in the EMPCA and a definition in this Permit Part B, the EMPCA prevails to the extent of the inconsistency.

ENVIRONMENTAL CONDITIONS

The person responsible for the activity must comply with the conditions contained in **Schedule 2** of this Permit Part B.

INFORMATION

Attention is drawn to **Schedule 3**, which contains important additional information.

Table Of Contents

Attachments

Schedule 1: Definitions

In this Permit Part B:-

Activity means any environmentally relevant activity (as defined in Section 3 of EMPCA) to which this document relates, and includes more than one such activity.

Authorized Officer means an authorized officer under section 20 of EMPCA.

Background Noise Level ($L_{A90,T}$) is the level that is exceeded 90% of the time for each measurement interval when measured in the absence of the subject site noise.

Commissioning means the testing of all major items of infrastructure and equipment related to the proposed upgrade of the Branxholm Sawmill as outlined in the documents titled *CMTP Pty Ltd - Branxholm Sawmill Upgrade - Environmental Effects Report* dated 11 June 2024 and *Supplement to the Environmental Effects Report* dated 9 September 2024. This infrastructure and equipment, includes a new building, profiling gang sawmill line, band saw, chip screen, chip bin and associated modifications to existing buildings, and sorting and stacking systems.

Construction means activities related to the construction of the infrastructure and equipment for the proposed upgrade of the Branxholm Sawmill as outlined in the documents titled *CMTP Pty Ltd - Branxholm Sawmill Upgrade - Environmental Effects Report* dated 11 June 2024 and *Supplement to the Environmental Effects Report* dated 9 September 2024. This infrastructure and equipment, includes a new building, profiling gang sawmill line, band saw, chip screen, chip bin and associated modifications to existing buildings, and sorting and stacking systems. The activities related to construction include but are not limited to, activities associated with the clearance of vegetation, site works to create a level site, rock breaking, installation of fences and other infrastructure whether on land or in water.

Control Location (Noise) means a location chosen to represent the general ambient sound without contribution from noise sources at the activity.

Controlled Waste has the meaning described in section 3(1) of EMPCA.

Director means the Director, Environment Protection Authority holding office under section 18 of EMPCA and includes a delegate or person authorised in writing by the Director to exercise a power or function on the Director's behalf.

Dominant or Intrusive Noise Characteristics means any noise characteristic that contributes to a noise being considered louder than would be indicated by the A-weighted sound pressure level measured, or that exacerbates nuisance or harm caused by the noise.

DRP means Decommissioning and Rehabilitation Plan.

EMPCA means the *Environmental Management and Pollution Control Act 1994.*

Environmental Guidelines For Wood Processing refers to the document of this title as published on the EPA website.

Environmental Harm and **Material Environmental Harm** and **Serious Environmental Harm** each have the meanings ascribed to them in Section 5 of EMPCA.

Environmental Nuisance has the meanings ascribed to it in Section 3 of EMPCA.

Environmentally Hazardous Material means any substance or mixture of substances of a nature or held in quantities which present a reasonably foreseeable risk of causing serious or material environmental harm if released to the environment and includes fuels, oils, waste and chemicals but excludes sewage.

EPA Board means the Board of the Environment Protection Authority established under section 13 of EMPCA and includes a delegate or person authorised in writing by the EPA Board to exercise a power or function on the EPA Board's behalf.

Existing Building means the building labelled as 'current sawmill line building' in Figure 3 of the document titled *CMTP Pty Ltd - Branxholm Sawmill Upgrade - Environmental Effects Report* dated 11 June 2024.

Facade means external walls, windows, ceilings and roofs.

New Building means the building labelled as 'new sawmill line building', and otherwise shown in the legend as 'new building', in Figure 3 of the document titled *CMTP Pty Ltd - Branxholm Sawmill Upgrade - Environmental Effects Report* dated 11 June 2024.

Noise Measurement Procedures Manual means the document titled *Noise Measurement Procedures Manual*, by the Department of Environment, Parks, Heritage and the Arts, dated July 2008, and any amendment to or substitution of this document.

Noise Sensitive Premises means residences and residential zones (whether occupied or not), schools, hospitals, caravan parks and similar land uses involving the presence of individual people for extended periods, except in the course of their employment or for recreation.

Non-Trivial Environmental Incidents means an incident requiring the person responsible to implement actions to control or respond to the incident to minimise environmental harm and/or nuisance.

Normal Ambient Noise refers to the ambient noise of the receiver location in the absence of the subject site noise. Ambient noise level is measured in L_{Aeq}.

Person Responsible is any person who is or was responsible for the environmentally relevant activity to which this document relates and includes the officers, employees, contractors, joint venture partners and agents of that person, and includes a body corporate.

Planning Authority means the Council(s) for the municipal area(s) in which The Land is situated.

Pollutant has the meaning ascribed to it in section 3 of EMPCA.

Product means sawn timber product but does not include woodchip, sawdust, bark or other residues.

Reporting Period means the financial year.

Stormwater means water runoff as a consequence of a rainfall event, whether surface flow, piped flow, or flow within conduits, including any contaminants collected by the water during its passage.

The Land means the land on which the activity to which this document relates may be carried out, and includes: buildings and other structures permanently fixed to the land, any part of the land covered with water, and any water covering the land. The Land falls within the area defined by Attachment 1.

Weed means a plant species that has, or is likely to have, an adverse impact on the environment because of the introduction, spread or increase in population size of the species in an area; and includes a declared weed as defined in the *Biosecurity Act 2019* and subordinate regulations.

DEPUTY CHAIRPERSON, BOARD OF THE ENVIRONMENT PROTECTION AUTHORITY

1 October 2024

Schedule 2: Conditions

Maximum Quantities

Q1 Regulatory limits

1 The activity must not exceed the following limits :

1.1 50,000 cubic metres per year of product.

1.2 50,000 tonnes per year of woodchip.

General

G1 Access to and awareness of conditions and associated documents

A copy of these conditions and any associated documents referred to in these conditions must be held in a location that is known to and accessible to the person responsible for the activity. The person responsible for the activity must ensure that all persons who are responsible for undertaking work on The Land, including contractors and sub-contractors, are familiar with these conditions to the extent relevant to their work.

G2 Incident response

If an incident causing or threatening environmental nuisance, serious environmental harm or material environmental harm from pollution occurs in the course of the activity, then the person responsible for the activity must immediately take all reasonable and practicable action to minimise any adverse environmental effects from the incident.

G3 Proposed change to activity

1 The person responsible must notify the Director in writing prior to implementing any change to the activity authorised by this document that may cause or increase the emission of a pollutant or which may result in environmental harm or environmental nuisance (even temporarily). A change includes, but is not limited to, any of the following:

1.1 an increase in the discharge of a pollutant, or the location of its discharge.

1.2 the construction, installation, alteration or removal of any structure or equipment used in the course of carrying out the activity.

1.3 any clearance of native vegetation or earthworks.

1.4 a change in the quantity or characteristics of materials used in carrying out the activity.

2 The notification must be in an approved form and include the following:

2.1 details of the proposed change;

2.2 an assessment of the environmental impacts that may result from the change;

2.3 any relevant approvals held by the person responsible; and

2.4 any advice from the relevant planning authority to the effect that approval is not required.

3 The person responsible must provide additional information as requested by an Authorized Officer.

4 The proposed change must not be implemented until the Director has confirmed in writing that they are satisfied that no other approval or variation of this document is required.

5 For the avoidance of doubt, a notification of a proposed change under this provision is not required if the proposed change is part of a referral to the EPA Board for assessment under sections 24, 25 or 27 of EMPCA.

G4 Change of responsibility

If the person responsible for the activity intends to cease to be responsible for the activity, that person must notify the Director in writing of the full particulars of any person who will become the person responsible for the activity, before such cessation.

G5 Change of ownership

If the owner of The Land upon which the activity is carried out changes or is to change, then, as soon as reasonably practicable but no later than 30 days after becoming aware of the change or intended change in the ownership of The Land, the person responsible must notify the Director in writing of the change or intended change of ownership.

G6 Complaints register

1 A public complaints register must be maintained. The public complaints register must, as a minimum, record the following detail in relation to each complaint received in which it is alleged that environmental harm (including an environmental nuisance) has been caused by the activity:

1.1 the date and time at which the complaint was received;

1.2 contact details for the complainant (where provided);

1.3 the subject matter of the complaint;

1.4 any investigations undertaken with regard to the complaint; and

1.5 the manner in which the complaint was resolved, including any mitigation measures implemented.

2 Complaint records must be retained for a period of at least 3 years.

G7 Annual Environmental Review

1 Unless otherwise specified in writing by the Director, a publicly available Annual Environmental Review for the activity must be submitted to the Director each year within three months of the end of the reporting period. Without limitation, each Annual Environmental Review must include the following information:

1.1 a statement by the General Manager, Chief Executive Officer or equivalent for the activity acknowledging the contents of the Annual Environmental Review;

1.2 subject to the *Personal Information Protection Act 2004*, a list of all complaints received from the public during the reporting period concerning actual or potential environmental harm or environmental nuisance caused by the activity and a description of any actions taken as a result of those complaints;

1.3 details of environment-related procedural or process changes that have been implemented during the reporting period;

1.4 a summary of the amounts (tonnes or litres) of both solid and liquid wastes produced and treatment methods implemented during the reporting period. Initiatives or programs planned to avoid, minimise, re-use, or recycle such wastes over the next reporting period should be detailed;

1.5 details of all non-trivial environmental incidents and/or incidents of non compliance with these conditions that occurred during the reporting period, and any mitigative or preventative actions that have resulted from such incidents;

1.6 a summary of the monitoring data and record keeping required by these conditions. This information should be presented in graphical form where possible, including comparison with the results of at least the preceding reporting period. Special causes and system changes that have impacted on the parameters monitored must be noted. Explanation of significant deviations between actual results and any predictions made in previous reports must be provided;

1.7 identification of breaches of limits specified in these conditions and significant variations from predicted results contained in any relevant EIS or EMP, an explanation of why each identified breach of specified limits or variation from predictions occurred and details of the actions taken in response to each identified breach of limits or variance from predictions;

1.8 a list of any issues, not discussed elsewhere in the report, that must be addressed to improve compliance with these conditions, and the actions that are proposed to address any such issues;

1.9 a summary of fulfilment of environmental commitments made for the reporting period. This summary must include indication of results of the actions implemented and explanation of any failures to achieve such commitments; and

1.10 a summary of any community consultation and communication undertaken during the reporting period.

G8 Amendment of required plans and reports

1 The plans and reports required by these conditions must be amended to address any matter required by the Director, as advised by notice in writing.

2 Amended plans and reports must be resubmitted within the timeframe that the Director specifies.

G9 Notification of commissioning

1 Within fourteen (14) days after the commencement of commissioning, the person responsible for the activity must notify the Director of the date on which commissioning commenced.

2 Within fourteen (14) days after the completion of commissioning, the person responsible for the activity must notify the Director in writing of the date on which commissioning was completed.

Atmospheric

A1 Covering of vehicles

Vehicles carrying loads containing material which may blow or spill must be equipped with effective control measures to prevent the escape of the materials from the vehicles when they leave The Land or travel on public roads. Effective control measures may include tarpaulins or load dampening.

A2 Control of dust emissions

Dust emissions from The Land must be controlled to the extent necessary to prevent environmental nuisance beyond the boundary of The Land.

A3 Control of dust emissions during construction

1 Construction activities must be managed using such measures as are necessary to prevent dust emissions causing environmental nuisance. Such measures may include but are not limited to:

1.1 using a dust suppression method such as watering dust generating surfaces; and

1.2 ceasing construction activities in windy weather when dust may be blown in the direction of residences.

A4 Control of fugitive emissions - Sawdust
The sawdust collection and/or sawdust storage system must be designed and maintained so that fugitive dust emissions are controlled to the extent necessary to prevent environmental nuisance.

A5 Restrictions for burning on-site
Unless otherwise approved in writing by the Director, burning of sawdust, wood chips and other wood wastes must not be undertaken on The Land.

A6 Dust complaints
In the event that a dust complaint is received in relation to the activity, the complaint must be reported to the Director within 24 hours.

<u>Decommissioning And Rehabilitation</u>

DC1 Notification of cessation
Within 30 days of becoming aware of any event or decision which is likely to give rise to the permanent cessation of the activity, the person responsible for the activity must notify the Director in writing of that event or decision. The notice must specify the date upon which the activity is expected to cease or has ceased.

DC2 Decommissioning and Rehabilitation Plan requirements

1 Unless otherwise approved in writing by the Director, a Decommissioning and Rehabilitation Plan (DRP) for the activity must be submitted for approval to the Director within 30 days of the Director being notified of the planned cessation of the activity in accordance with condition DC1. The DRP must be prepared in accordance with any guidelines provided by the Director. This requirement will be deemed to be satisfied only when the Director indicates in writing that the submitted document adequately addresses the requirements of this condition.

2 The person responsible may apply to the Director to vary or substitute the DRP. Any variation or substitution of the plan approved by the Director, by notice in writing, replaces the earlier approval with effect from the date specified in the notice.

DC3 Rehabilitation following cessation

1 Following permanent cessation of the activity, and unless otherwise approved in writing by the Director, The Land must be rehabilitated including:

1.1 stabilisation of any land surfaces that may be subject to erosion;

1.2 removal or mitigation of all environmental hazards or land contamination, that might pose an ongoing risk of causing environmental harm; and

1.3 decommissioning of any equipment that has not been removed.

2 Where a DRP has been approved by the Director, decommissioning and rehabilitation must be carried out in accordance with that plan.

DC4 Temporary suspension of activity

1 Within 30 days of becoming aware of any event or decision which is likely to give rise to the temporary suspension of the activity, the person responsible for the activity must notify the Director in writing of that event or decision. The notice must specify the date upon which the activity is expected to suspend or has suspended.

2 During temporary suspension of the activity The Land must be managed and monitored by the person responsible for the activity to ensure that emissions from The Land do not cause serious environmental harm, material environmental harm or environmental nuisance.

3 If required by the Director, a Care and Maintenance Plan for the activity must be submitted to the Director for approval, by a date specified in writing by the Director. This requirement will be deemed to be satisfied only when the Director indicates in writing that the submitted document adequately addresses the requirements of this condition.

3.1 The Care and Maintenance Plan must be prepared in accordance with any reasonable guidelines provided by the Director.

3.2 Once approved, the person responsible must act in accordance with the approved Care and Maintenance Plan.

3.3 The person responsible may apply to the Director to vary or substitute the Care and Maintenance Plan. Any variation or substitution of the plan approved by the Director, by notice in writing, replaces the earlier approval with effect from the date specified in the notice.

4 Unless otherwise approved in writing by the Director, if the activity on The Land has substantially ceased for 2 years or more, rehabilitation of The Land must be carried out in accordance with the requirements of these conditions as if the activity has permanently ceased.

Hazardous Substances

H1 Spill kits

Spill kits appropriate for the types and volumes of materials handled on The Land must be kept in appropriate locations and maintained in a functional condition to assist with the containment of spilt environmentally hazardous materials.

H2 Storage and handling of hazardous materials

1 Unless otherwise approved in writing by the Director, all environmentally hazardous materials, including chemicals, fuels, and oils, stored on The Land in volumes exceeding 250 litres must be stored and handled in accordance with the following:

1.1 Any storage facility must be contained within a spill collection bund with a net capacity of whichever is the greater of the following:

1.1.1 at least 110% of the combined volume of any interconnected vessels within that bund; or

1.1.2 at least 110% of the volume of the largest storage vessel; or

1.1.3 at least 25% of the total volume of all vessels stored in that spill collection bund; or

1.1.4 the capacity of the largest tank plus the output of any firewater system over a twenty minute period.

1.2 All activities that involve a significant risk of spillages, including the loading and unloading of bulk materials, must take place in a bunded containment area or on a transport vehicle loading apron.

1.3 Bunded containment areas and transport vehicle loading aprons must:

1.3.1 be made of materials that are impervious to any environmentally hazardous material stored within the bund;

1.3.2 be graded or drained to a sump to allow recovery of liquids;

1.3.3 be chemically resistant to the chemicals stored or transferred;

1.3.4 be designed and managed such that any leakage or spillage is contained within the bunded area (including where such leakage emanates vertically higher than the bund wall);

1.3.5 be designed and managed such that the transfer of materials is adequately controlled by valves, pumps and meters and other equipment wherever practical. The equipment must be adequately protected (for example, with bollards) and contained in an area designed to permit recovery of any released chemicals;

1.3.6 be designed such that chemicals which may react dangerously if they come into contact have measures in place to prevent mixing; and

1.3.7 be managed such that the capacity of the bund is maintained at all times (for example, by regular inspections and removal of obstructions).

Noise Control

N1 Noise emission limits

1 Noise emissions from the activity at any noise sensitive premises in other ownership and expressed as the equivalent continuous A-weighted sound pressure level must not exceed:

1.1 55 dB(A) between 0700 hours and 1800 hours (day time); and

1.2 40 dB(A) between 1800 hours and 2200 hours (night time).

2 Unless otherwise approved in writing by the Director, the noise emission limit in condition N1(1) only applies to the activity for three (3) years from the date on which these conditions take effect.

3 Unless otherwise approved in writing by the Director, immediately after the noise emission limit in condition N1(1) ceases to apply in accordance with condition N1(2), noise emissions from the activity at any noise sensitive premises in other ownership and expressed as the equivalent continuous A-weighted sound pressure level must not exceed:

3.1 50 dB(A) between 0700 hours and 1800 hours (day time); and

3.2 40 dB(A) between 1800 hours and 2200 hours (night time).

4 Where the combined level of noise from the activity and the normal ambient noise exceeds the noise levels stated in condition N1(1) or (2) above, this condition will not be considered to be breached unless the noise emissions from the activity are audible and exceed the background noise level by at least 5 dB(A).

5 The time interval over which noise levels are averaged must be 10 minutes or an alternative time interval specified in writing by the Director.

6 Unless otherwise approved in writing by the Director, all methods of measurement must be in accordance with the *Noise Measurement Procedures Manual*.

N2 Noise Reduction Plan

1 Unless otherwise approved by the Director in writing, within six (6) months of the date on which these conditions take effect and six (6) months prior to the noise emission limits specified in condition N1(3) taking effect, a Noise Reduction Plan must be submitted to the Director for approval. The Noise Reduction Plan is to have the aim of reducing the day time noise emissions from the activity to achieve compliance with the daytime noise emission limits imposed by condition N1(3.1), by implementing reasonable and practical noise attenuation and mitigation measures and mitigating any intrusive or dominant noise characteristics. This requirement will be deemed to be satisfied only when the Director indicates in writing that the submitted document adequately addresses the requirements of this condition.

2 The Noise Reduction Plan must be informed by noise surveys undertaken in accordance with conditions N4 and N5.

3 Without limitation, the Noise Reduction Plan must include details of the following:

3.1 an assessment of options available to reduce noise emissions from the activity;

3.2 a selection of the preferred options available to reduce noise emissions from the activity and the reasons why the preferred options have been selected;

3.3 prioritised actions to achieve the aim of the Noise Reduction Plan;

3.4 details of the expected reduction in noise emissions that each action will achieve;

3.5 a timetable for implementation and completion of the actions;

3.6 measures for determining the success of the completed actions; and

3.7 a reporting program to regularly advise the Director on the implementation and results of the Noise Reduction Plan.

4 Once approved the person responsible must act in accordance with the approved Noise Reduction Plan.

5 The person responsible may apply to the Director to vary or substitute the Noise Reduction Plan. Any variation or substitution of the Noise Reduction Plan approved by the Director, by notice in writing, replaces the earlier approval with affect from the date specified in the notice.

N3 Noise Report

1 Unless otherwise specified in writing by the Director, within six (6) months of the completion of commissioning, a Noise Report must be submitted to the Director for approval in writing.

2 The Noise Report is to establish baseline noise emissions from the activity following commission to inform on compliance with relevant noise emission limits imposed by condition N1.

3 Without limitation, the Noise Report must:

3.1 provide the sound power levels and locations of all relevant noise emitting equipment on site;

3.2 discuss how the final design of the new building and the existing building, and the selected construction materials for each facade influenced cumulative noise emissions predicted at the nearby noise sensitive premises shown in Attachment 2;

3.3 provide the results of a noise survey undertaken after the completion of commissioning and in accordance with conditions N4 and N5 that shows the cumulative noise emissions from normal and worst case daytime operating conditions measured at the monitoring locations shown in Attachment 2;

3.4 list all noise mitigation measures implemented at the site since these conditions took effect;

3.5 demonstrate that noise emissions from the new building at the nearby noise sensitive premises shown in Attachment 2 and expressed as the equivalent continuous A-weighted sound pressure level do not exceed 40dB(A); and

3.6 demonstrate that the cumulative noise emissions from the activity at the nearby noise sensitive premises shown in Attachment 2 and expressed as the equivalent continuous A-weighted sound pressure level do not exceed the noise emission limits in condition N1(1).

N4 Noise survey requirements

1 Unless otherwise approved in writing by the Director, a noise survey must be completed:

1.1 to inform the Noise Report and Noise Reduction Plan required by conditions N2 and N3; and

1.2 six (6) months after any change to the activity which is likely to substantially alter the character or increase the volume of noise emitted from The Land; and

1.3 where the Director is of the opinion that a noise survey must be completed within a specified timeframe; and

1.4 recurrently, with no longer than two (2) years since the previous survey.

N5 Noise survey method and reporting requirements

1 Unless otherwise approved in writing by the Director, all methods of measurement must be in accordance with the *Noise Measurement Procedures Manual*.

2 Without limitation, the survey method must address the following:

2.1 measurements must be carried out at day, evening and night times (where applicable) at each location; and

2.2 measurement locations must be specified with one location established as a control location (noise), and must include the monitoring locations shown in Appendix 2.

3 Measurements and data recorded during the survey must include:

3.1 operational status of noise producing equipment and throughput of the activity;

3.2 simultaneous source noise measurements;

3.3 subjective descriptions of the sound at each location;

3.4 details of meteorological conditions relevant to the propagation of noise;

3.5 the equivalent continuous (L_{eq}) and L_{max}, L_1, L_{10}, L_{50}, L_{90}, L_{99} and L_{min} A-weighted sound pressure levels measured over a period of 10 minutes or an alternative time interval approved by the Director;

3.6 a data set containing periods capturing normal and worst operating conditions;

3.7 A-weighted and C-weighted one-third octave spectra (including low frequency) over suitably representative periods of not less than 1 minute presented in tabulated and graph format; and

3.8 narrow-band spectra over suitably representative periods of not less than 1 minute.

4 Unless otherwise approved in writing by the Director, a noise survey report must be forwarded to the Director within 30 days from the date on which the noise survey is completed.

5 The noise survey report must include the following:

5.1 the results and interpretation of the measurements required by these conditions;

5.2 a map of the area surrounding the activity with the boundary of The Land, measurement locations, and noise sensitive premises clearly marked on the map;

5.3 any other information that will assist with interpreting the results and whether the activity is in compliance with these conditions and EMPCA; and

5.4 recommendations of appropriate mitigation measures to manage any noise problems identified by the noise survey.

6 Where noise emissions from the activity contain any dominant or intrusive noise characteristics at any noise sensitive premises in other ownership, measured noise levels must be adjusted for tonality, implusiveness, modulation and low frequency in accordance with the *Noise Measurement Procedures Manual*.

N6 Log drops

When unloading from a vehicle and/or stockpile, all reasonable and practicable care must be taken to avoid the dropping of logs from height by placing them either onto the ground or directly onto log decks.

N7 Operating hours

1 Unless otherwise approved by the Director, activities associated with milling or machining of timber and loading/unloading of wood deliveries to and from The Land must not be undertaken outside the following times:

1.1 0700 hours to 1800 hours Monday to Saturday.

2 Notwithstanding the above paragraph, the above activities must not be carried out on Public Holidays that are observed State-wide (Easter Tuesday excepted) without the written approval of the Director.

3 The permitted hours of operation for the gas-fired kiln on The Land are twenty-four hours per day, seven days per week.

N8 Chainsaw operation

Unless otherwise approved in writing by the Director, the operation of a chainsaw (powered by an internal combustion engine) on The Land is only permitted within the hours of 0700 to 1800 Monday to Saturday, with no operations permitted on Sundays and Public Holidays that are observed Statewide (Easter Tuesday excepted).

N9 Noise complaints

In the event that a noise complaint is received in relation to the activity, the complaint must be reported to the Director within 24 hours.

Operations

OP1 Copper Chromium Arsenate area

Unless otherwise approved in writing by the Director, there must be no disturbance of the area on which Copper Chromium Arsenate timber preservation activities were previously conducted as depicted in Figure 3 of the document titled *CMTP Pty Ltd - Branxholm Sawmill Upgrade - Environmental Effects Report* dated 11 June 2024 and Attachment 1 to the document titled *Supplement to the Environmental Effects Report* dated 9 September 2024.

OP2 Weed management

The Land must be kept substantially free of weeds to minimise the risk of weeds being spread through the transport of product, woodchip, sawdust, bark or other residues from The Land.

OP3 Management of Acid Sulphate Soils

1 Unless otherwise approved in writing by the Director, prior to the excavation of soils for construction, the person responsible must:

1.1 provide sample results of soils sampled on the activity site representative of the soil to be excavated to confirm whether Acid Sulphate Soils are present; and

1.2 if the sample results show that Acid Sulphate Soils are present, the person responsible must provide an Acid Sulphate Soils Management Plan for approval by the Director, to demonstrate how these soils will be excavated, stored, treated and disposed of or reused on The Land.

2 Excavation of soils must not be undertaken until the Director indicates in writing that this may occur.

Stormwater Management

SW1 Retention of sediment

During construction activities all reasonable measures must be implemented to ensure that solids entrained in stormwater traversing the construction site are retained on The Land. Such measures may include provision of strategically located sediment fences, and appropriately sized and maintained sediment settling ponds.

SW2 Perimeter drains or bunds

1 Perimeter cut-off drains, or bunds, must be constructed at strategic locations on The Land to prevent surface run-off from entering the area used or disturbed in carrying out the activity. All reasonable measures must be implemented to ensure that sediment transported along these drains, or bunds, remains on The Land. Such measures may include provision of strategically located sediment fences, appropriately sized and maintained sediment settling ponds, vegetated swales, detention basins and other measures designed and operated in accordance with the principles of Water Sensitive Urban Design.

2 Drains, or bunds, must have sufficient capacity to contain run-off that could reasonably be expected to arise during a 1 in 20 year rainfall event. Maintenance activities must be undertaken regularly to ensure that this capacity does not diminish.

SW3 Maintenance of settling ponds

Sediment settling ponds must be periodically cleaned out to ensure that the pond design capacity is maintained. Sediment removed during this cleaning must be securely deposited such that sediment will not be transported off The Land by surface run-off.

SW4 Stormwater

1 Polluted stormwater that will be discharged from The Land must be collected and treated prior to discharge to the extent necessary to prevent serious or material environmental harm, or environmental nuisance.

2 Notwithstanding the above, all stormwater that is discharged from The Land must not carry pollutants such as sediment, oil and grease in quantities or concentrations that are likely to degrade the visual quality of any receiving waters outside The Land.

3 All reasonable measures must be implemented to ensure that solids entrained in stormwater are retained on The Land. Such measures may include appropriately sized and maintained sediment settling ponds or detention basins.

Schedule 3: Information

Legal Obligations

LO1 EMPCA

The activity must be conducted in accordance with both the conditions in this document and the obligations of the *Environmental Management and Pollution Control Act 1994* (EMPCA) and subordinate regulations. The conditions of this document do not replicate legislated obligations; therefore, you should ensure you are aware of your obligations under EMPCA and subordinate regulations.

LO2 Waste and Resource Recovery Act 2022 obligations

The activity may be a prescribed a Landfill or Resource Recovery Facility under the *Waste and Resource Recovery Act 2022* and must comply with reporting and obligations under that legislation.

LO3 Controlled waste transport

Transport of controlled wastes to and from The Land must be undertaken only by persons authorised to do so under EMPCA or subordinate legislation.

Other Information

OI1 Environmental Guidelines for Wood Processing

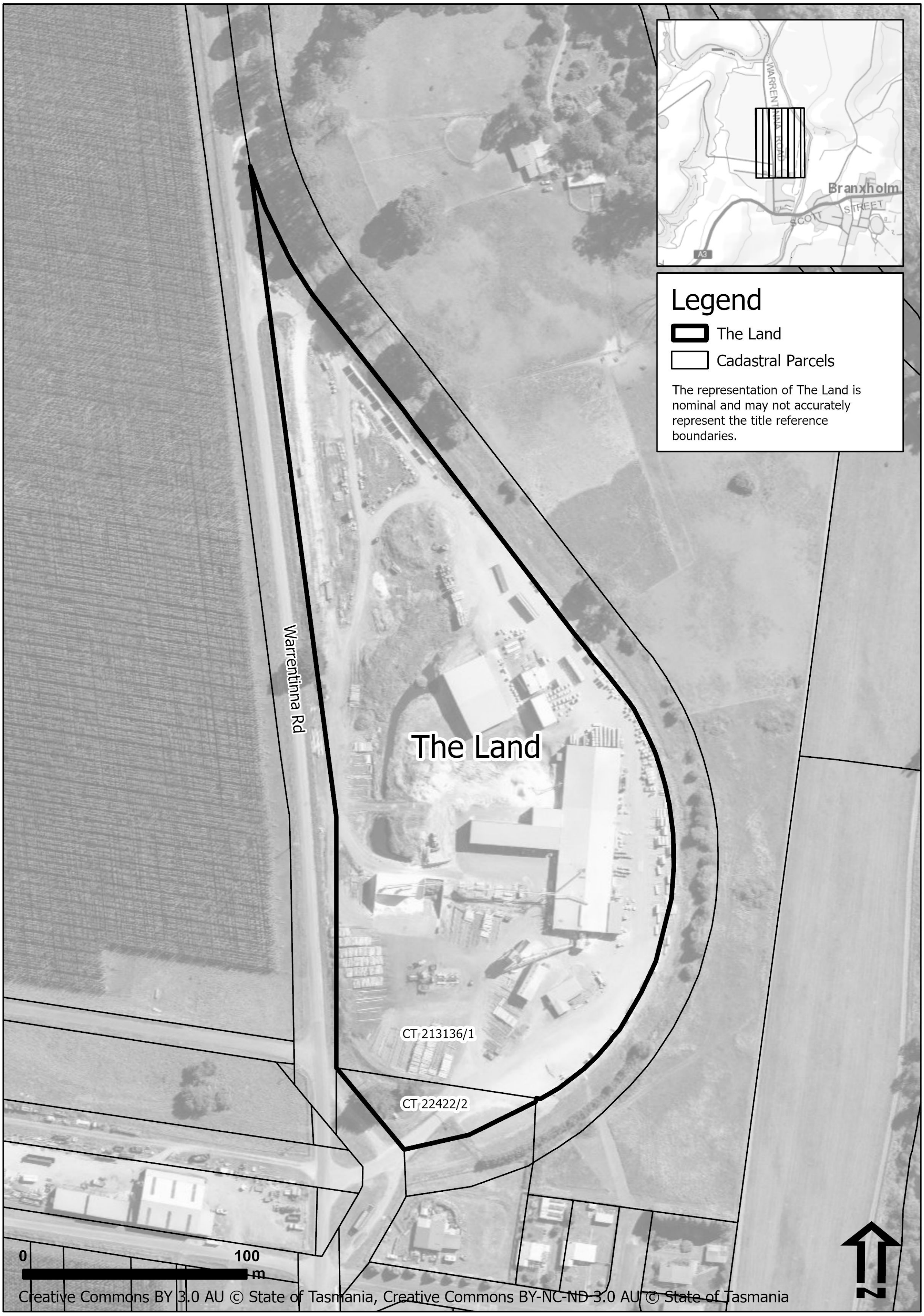
Information to assist in managing environmental risks associated with operation of the activity, along with other information related to environmental regulation is available in the *Environmental Guidelines for Wood Processing*. The Guidelines are available on the EPA website.

OI2 Waste management hierarchy

1 Wastes should be managed in accordance with the following hierarchy of waste management:

- **1.1** waste should be minimised, that is, the generation of waste must be reduced to the maximum extent that is reasonable and practicable, having regard to best practice environmental management;
- **1.2** waste should be re-used or recycled to the maximum extent that is practicable; and
- **1.3** waste that cannot be re-used or recycled must be disposed of at a waste depot site or treatment facility that has been approved in writing by the relevant planning authority or the Director to receive such waste, or otherwise in a manner approved in writing by the Director.

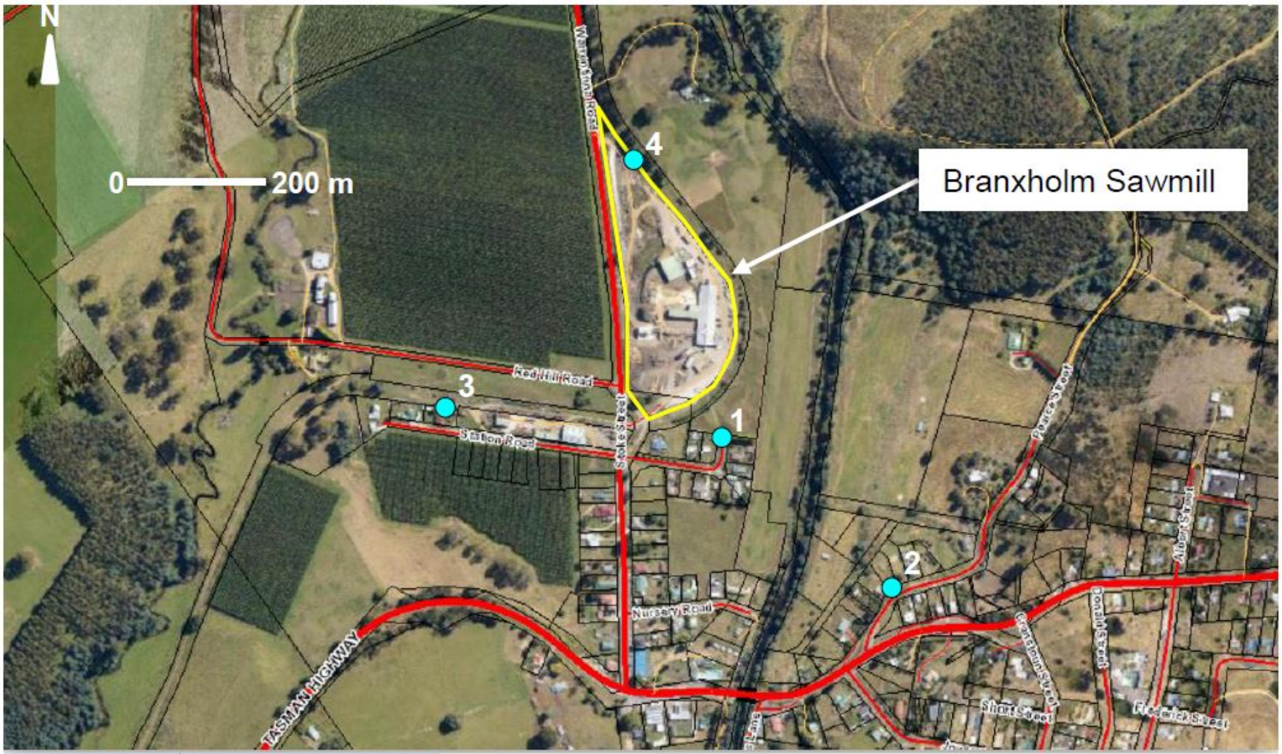
Attachment 1: The Land



DEPUTY CHAIRPERSON, BOARD OF THE ENVIRONMENT PROTECTION AUTHORITY

1 October 2024

Attachment 2: Noise Monitoring Locations



Number	Location
1	Southern Boundary
2	Pearce St
3	Station Rd
4	Northern boundary

EPA TASMANIA
ENVIRONMENT PROTECTION AUTHORITY