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Monitoring, reporting and compliance



Scenic grounds of Mary Brand Park along the Mehi River, Moree
Courtesy of Destination NSW



This section outlines the monitoring, reporting and compliance program for the Moree Special Activation Precinct.

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7.1 General

The Moree Special Activation Precinct will be a sustainable hub of high value production and manufacturing supporting advanced industries and businesses which are connected to the world.

The precinct has been developed with the United Nations Industrial Development Organization (UNIDO) Eco-Industrial Park (EIP) Framework, UN Sustainable Development Goals, Ecologically Sustainable Development (ESD) and circular economy principles embedded. A key component for the precinct is therefore the establishment of the monitoring, reporting and compliance program.

An annual baseline audit will inform the actions required to protect and improve the precinct's targets, actions, management and mitigation measures. This will help drive an adaptive management cycle for monitoring, reporting and compliance across the precinct.

The program will be developed progressively in consultation with partners, including Moree Plains Shire Council, the NSW Environment Protection Authority, industry and businesses, the community, and research and conservation sectors.

The delivery plan will be amended or updated as required.

Purpose and objectives

A key component for the success of the precinct will be meaningful monitoring, reporting and compliance measures. This should form a coordinated and integrated program linked to precinct outcomes.



The program will report across different themes, including:

- sustainability
- circular economy
- energy management
- gali-water management
- waste management
- biodiversity
- environmental health
- infrastructure
- operational requirements.

The intent of the program is to coordinate and integrate existing monitoring, modelling and reporting systems across these themes to avoid duplication. For example, if there are existing Environment Protection Licences in place for industry across the precinct, the corporation would seek to also capture the data that is monitored and reported on under the Environment Protection Licence through liaison with proponents.

The program's principal purpose is to evaluate whether the precinct is on track to meet its targets, objectives and outcomes. It will also help to identify emerging issues and risks and enable timely and suitable responses, management updates and mitigation measures.

The program ensures decisions regarding the protection and management of the precinct are based on sound evidence, set best practice standards, are consistent with the principles of transparency and accountability and are underpinned by a partnership approach.



Objectives for the program are to:

- enable the early detection of trends, changes, threats and risks within the precinct, driving adaptive management
- evaluate the effectiveness of key themes, including the establishment and development of sustainability and circular economy outcomes
- ensure monitoring, reporting and compliance functions are meaningful and focus on actions that will effectively deliver measurable results
- track and inform the performance of the precinct against domestic and international benchmarks.

Principles

The following principles will apply to the monitoring, reporting and compliance program across the precinct:

- monitoring is linked to management targets, objectives and outcomes in the precinct
- collaboration is essential between industry, businesses, research, education, academic and other partner organisations
- information and data are transparent, accountable, comprehensive and readily accessible
- the program will build on and align with existing systems, and not duplicate or replace systems
- the program will cover the lifespan of the precinct and be responsive as it develops and grows
- program design will be evidence based and scientifically defensible. This should also feed back into an adaptive management cycle to provide management and mitigation measures that respond appropriately to the precinct outcomes or other risks and drivers
- the program should be reviewed regularly, at least every five years as a result of findings in the precinct.

Collaboration and partnerships

A collaborative approach with partner organisations that use or generate precinct monitoring, reporting or compliance data will be fundamental to successfully establishing and implementing management and mitigation measures. This involvement is critical to ensuring that the program is underpinned by the best available science and expertise.

The partnership approach underpinning the program will leverage knowledge and funds to deliver increased efficiencies and improved alignment and coverage of monitoring, reporting and compliance functions.

Adaptive management

The precinct is underpinned by strong environmental protection, sustainability and circular economy principles. Sound monitoring, reporting and compliance data can be used to assess and update adaptive management responses.

Any data obtained through the lifecycle of the precinct will continue to inform and update the management and mitigation measures within the precinct.

This allows the precinct to have living management and mitigation measures that respond appropriately to changing drivers or risks.

Monitoring

The program will measure and report progress towards achieving the precinct outcomes, objectives and targets, and guide adaptive management.

Baseline monitoring

Monitoring will be undertaken to compile baseline conditions of the precinct and assess the extent of impact from the growth of the precinct. This will also help evaluate community benefits and sentiment. Examples include monitoring to assess amenity considerations such as noise, odour and air quality, effective and efficient gully-water and energy management, and the uptake and implementation of sustainability and circular economy opportunities.

Compliance monitoring

Compliance monitoring will be undertaken in relation to any licence or approval that may apply to the land. This may include an Environment Protection Licence or development consent, and relate to, but is not limited to, the conditions specified in the licence or approval.

Reporting

Consistent reporting of information will help track and evaluate the precinct against its outcomes, objectives and targets. Standardised reporting templates will be developed to ensure data and information is recorded consistently.

An annual report on implementation and operation of the precinct will be provided to the corporation's Advisory Committee and will be made publicly available. This report will be prepared by the corporation and provide an assessment of progress delivering and achieving the precinct's outcomes, objectives and targets.

Compliance

Construction and operation

The two main compliance functions in the precinct are construction and planning, and operational requirements.

The enforcement authority for construction and planning compliance functions will depend on who is responsible for issuing the development consent.

For construction and planning compliance functions, the enforcement authority is:

- Moree Plains Shire Council for planning related matters for a Complying Development Certificate, such as an already constructed structure
- accredited certifier or Moree Plains Shire Council for conditions relating to a Complying Development Certificate depending on the level of action required
- Secretary, Department of Planning and Environment for thermal electricity generating works in the precinct
- Secretary, Department of Planning and Environment for the removal of dhulu-trees within land zoned 'environmentally sensitive area' where complying development is not possible.

For operational compliance functions related to matters under the Protection of the *Environment Operations Act 1997*, the enforcement authority is:

- NSW Environment Protection Authority (EPA) for scheduled activities
- Moree Plains Shire Council for non-scheduled activities.

The NSW Environment Protection Authority (EPA) is the state's principal environmental regulator and responsible for regulating a wide range of activities and monitoring compliance with legislation and statutory instruments covering air emissions, noise, waste, water quality, forestry, contaminated sites, dangerous goods, hazardous materials and pesticides. The EPA requires regulated industry to report on its compliance. All Environmental Protection Licensees must provide an Annual Returns statement detailing their compliance with licence conditions over the previous reporting period.

The enforcement authority for operational compliance functions will depend on whether the development is classed as either a scheduled or non-scheduled activity under the *Protection of the Environment Operations Act 1997*.

Roles of the corporation

The corporation is the government agency responsible for the delivery and management of the precinct including:

- the delivery plan and precinct design guidelines
- managing and coordinating major precinct infrastructure works
- supporting existing businesses and attracting new investments to the precinct
- managing and implementing precinct frameworks and strategies.

The corporation has no formal enforcement powers in relation to construction and operational matters in the precinct.

Under its powers in the *Growth Centres (Development Corporations) Act 1974*, the corporation has the ability "to assist councils with respect to matters concerning the promotion, co-ordination and management" of the precinct.

As such, the corporation will work collaboratively with Moree Plains Shire Council to implement a mutually beneficial approach for enforcement activities.

For example, where a development is non-compliant with fencing requirements, the corporation would first work with the business as an industry partner to rectify the matter, prior to Moree Plains Shire

Council issuing any statutory compliance/enforcement response. For scheduled premises the EPA is the regulatory authority and any non-compliance with licensing provisions must be reported immediately to the EPA, in concordance with the terms of the license.

Review of monitoring, reporting and compliance program

A full review of the program will be undertaken and updated every five years if required. The monitoring, reporting and compliance functions can be updated at regular intervals should new management and mitigation measures be incorporated into the adaptive management cycle. This will ensure monitoring, reporting and compliance functions respond appropriately to new information, changing drivers or risks.

The monitoring, reporting and compliance program will be developed progressively in consultation with partners, including Moree Plains Shire Council, Department of Planning and Environment, EPA, industry and businesses, the community, and research and conservation sectors.

7.2 Precinct-wide monitoring program

Throughout the delivery of the precinct, the corporation will be responsible for undertaking a precinct wide monitoring program which will be used to evaluate whether the precinct is on track to meet its targets, objectives and outcomes.

The corporation is committed to improving environmental performance and becoming a leading organisation, nationally and internationally, in sustainable development and implementing the sustainability framework to connect organisations, processes and source in a circular economy to gain efficiencies and minimise waste.



Mehi River, Moree

Environmental Management Framework

To ensure the precinct can achieve its goals and fully embed these frameworks and principles, an ISO 14001 Environmental Management System (EMS) has been developed which incorporates an Environmental Management Framework and an Environmental Management Register. In addition to the EMS, the United Nations Industrial Development Organization (UNIDO) Eco-Industrial Park (EIP) Framework has been embedded into the master plan and the EMS to ensure that the precinct improves environmental, economic and social performance with the aim to create the first Eco-Industrial Park in Australia.

The corporation is the government agency responsible for delivering the EMS.

The EMS contains targets, actions objectives and outcomes to achieve environmental protection, sustainability and circular economy outcomes. The aim is to ensure the long-term protection and improvement of the precinct's health and resilience, while integrating economic development with ecologically sustainable principles.

The EMS will be monitored on an ongoing basis using a detailed monitoring and evaluation process outlined in the EMS. This will include monitoring and reporting on greenhouse gas emissions data from activities and operations within the precinct to meet the net-zero emissions target.

A review of compliance, performance data and key performance indicators (KPIs) will be undertaken at least quarterly with an annual review undertaken as part of annual reporting requirements.

Following the review process, an annual compliance, data and KPI review will be undertaken to confirm that the EMS is effective in managing and improving environmental performance. KPIs have been developed during the initial master planning stage and were based on detailed modelling and research. KPIs will be assessed and updated once the precinct is operational and on an annual basis thereafter.

Businesses and organisations within the precinct will have a responsibility to provide data to the corporation to inform annual reporting on the EMS, including reporting on greenhouse gas emissions during both construction and operation.

The EMS will be subject to an external audit by a third-party approved auditor with accreditation provided as per ISO 14001.

Assessed as part of the review process:

Review item	Summary
Organisational details	A review of the organisation structure, roles and responsibilities and scope/boundary
Leadership commitment	A review of leadership commitment and the environmental policy to ensure currency
Compliance and legislation	A review of compliance and regulatory requirement to ensure the precinct is not exposed to new legislation or compliance issues
Environmental aspects and impacts	A review of environmental aspects and impacts to ensure all environmental issues are captured
Objectives and targets	A review of objectives and targets to ensure the EMS is aligned with the delivery of the precinct
Support	A review of support systems (resources, training, awareness, communications) to ensure the corporation employees are equipped to manage environmental performance
Performance evaluation	A review of outcomes/data against KPIs to track performance and monitor improvements over time
Operations	A review of the operational aspects of the organisation, along with emergency planning and response
Improvements	A review of the performance and continual improvement outcomes and ensure that existing systems are creating ongoing opportunities for improving environmental performance

Environmental monitoring

Precinct wide environmental monitoring will be undertaken by the corporation in relation to:



gali-water quality



groundwater



air



noise



odour.

Businesses and organisations within the precinct will have a responsibility to provide data to the corporation on site or project based environmental monitoring to inform the precinct wide annual reporting on the EMS.

The objectives and principles of the environmental monitoring is provided:



Gali-Water quality

- Gali-Water quality will be managed through a precinct wide stormwater management strategy and contaminant management site specific stormwater quality controls.



Groundwater

- The corporation will establish a groundwater baseline register which will provide a central point for all developments that present a risk and may potentially impact on groundwater
- The EMS register will identify developments with a high potential risk to groundwater, and any groundwater monitoring requirements that apply through an Environment Protection Licence
- The groundwater baseline register will be a live document which will be updated and amended as new development occurs within the precinct.



Air quality

- The corporation will work with relevant government agencies (i.e. EPA) to establish unattended monitoring stations within the precinct
- The monitoring stations capable of measuring ambient air quality levels and can be progressively re-located as more industry is developed or as areas become unsuitable over time
- Annual monitoring reports will be prepared to assess the trends in pollutant levels over time as a means of evaluating the overall performance of the SAP compared with relevant guidelines.



Noise

- The corporation will work with relevant government agencies (i.e. EPA) to establish a program which includes monitoring and reporting on noise emissions
- Where monitoring indicates increasing noise levels at or above the cumulative criteria, more frequent attended monitoring may be warranted to identify the issue and determine what if any action may be needed
- Annual monitoring reports will be prepared to assess the trends in noise levels over time as a means of evaluating the overall performance of the precinct compared with relevant guidelines.

Odour

- The corporation will work with relevant government agencies (i.e. EPA) to establish a monitoring and reporting program, which includes monitoring and reporting on odour emissions
- Where monitoring indicates increasing odour emissions, more frequent attended monitoring may be warranted to identify the issue and determine what if any action may be needed
- Odour sampling of sources at a site can also be conducted where necessary to determine the total site odour emission rate and compare this with the allowance for the specific parcel of land
- Annual monitoring reports will be prepared to assess the trends in odour emission levels over time as a means of evaluating the overall performance of the precinct compared with relevant guidelines.

Data

Businesses in the precinct will work with the corporation as industry partners to ensure the ongoing health and performance of the precinct can be measured.

Businesses will be required to enter into a data-use agreement setting out how data will be collected, used, stored and shared.

The following policies are referenced as best practice guides for the collection and use of data:

- Standard Technical Requirements for Spatial Datasets and Maps (August 2017) prepared by the Department of Planning and Environment
- NSW Standard for Spatially Enabling Information (May 2018) prepared by the NSW ICT and Digital Leadership Group.

Where possible, businesses should provide data in accordance with the buildingSMART standard as a best practice standardisation tool for digital infrastructure data.

How will the data be used?

The collection, capture and use of reliable data will be paramount to the success of precinct.

High quality data will provide for valuable analysis of the precinct at any given time. It allows the precinct's health and performance to be accurately managed.

This enables the corporation as the precinct custodian to proactively manage and respond to the precinct's needs.

A key component of the data captured in the precinct will focus on infrastructure assets. This helps to understand the planning, design, construction and operational phases of infrastructure assets.

The corporation's approach to the management of infrastructure data is based on the NSW Infrastructure Data Management Framework.

These principles will ensure the clear capture and application of data using common, open standards. This makes the data ideal from a usability perspective, such as through the use of digital twins.

The core principles the corporation will adopt for data management include:

Public good	Should deliver public good
Value	Should provide ongoing value and insights of infrastructure across the asset lifecycle
Quality	Should provide sufficient information to assess data reliability and quality
Adaptability	Should be flexible and scalable to allow adaptation to new technology and societal needs
Openness	Should be as openly available, accessible and discoverable as possible to maximise value and reuse
Security and privacy	Should be secure and private by design and facilitate security and privacy-preserving role-based access
Curation	Should have clear responsibilities, ownership and regulation
Standards	Should have consistent agreed standards (open where feasible) to enable interoperability
Federation	Should enable an interconnected ecosystem of data environments supported by custodians

Environmental management plans

Businesses in the precinct may need to prepare an environmental management plan (EMP) which is a site or project specific plan developed to ensure that appropriate environmental management practices are followed during a project's construction and operation.

EMPs will ensure:

- application of best practice environmental management to a project
- the implementation of a projects conditions of approval or consent
- compliance with environmental legislation
- that environmental risks associated with a project are properly managed.

The scope of an EMP will vary depending on the scale and nature of a project.