



Holcim (Australia) Pty Ltd

Jandra Quarry 2019 Independent Environmental Compliance Audit

December 2019

Executive summary

GHD Pty Ltd (GHD) was commissioned by Holcim (Australia) Pty Ltd (Holcim) to conduct an audit of Holcim's compliance with the requirements of its Development Consent (DA 231-10-99) and Environment Protection Licence (EPL # 2796) for the Jandra Quarry (the project). The scope of this audit is set out by Condition 8 of Schedule 5 of the Development Consent. This report presents the audit findings.

The audit assessed the compliance status of the Jandra Quarry against the Development Consent and other relevant environmental approvals and licences, for operations since the 2016 independent environment audit (2016 IEA) site inspection (21 May 2016) to the date of the site inspection for the 2019 IEA (Tuesday, 17 September 2019).

The review of compliance with the Development Consent identified 19 non-compliances, of which 12 were administrative non-compliances (ANCs), as detailed in Section 3 of this report. The environmental risk associated with all of the non-compliances was considered low as detailed in Section 3.

The review of compliance with EPL 2796 identified eight, non-compliances, three of which are ANCs, as detailed in Section 3 of this report. Five of the non-compliances directly relate to non-compliances with the Development Consent. Therefore, rather than being additional non-compliances, they are a reflection of non-compliances with conditions of the Development Consent. The environmental risk associated with all of the non-compliances was considered low as detailed in Section 3.3.

Detailed findings of compliance for the Development Consent and EPL are provided as appendices to this report. A number of recommendations were made during the audit relating to the Development Consent and EPL, which are detailed in Section 4 of this report. However, no significant environmental issues were identified during the site inspection or review of environmental monitoring associated with operations; this is supported by a noted lack of complaints or significant incidents having occurred during the audit period.

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1. Introduction

1.1 Introduction and purpose of this report

Holcim (Australia) Pty Ltd (Holcim) is one of Australia's leading producers and suppliers of construction materials such as concrete and quarry products, with over 65 quarry operations supplying rail ballast, aggregates, gravels, road pavement materials, and manufactured and natural sands.

The Jandra Quarry is a hard rock quarry located on the Pacific Highway at Possum Brush, approximately 17 kilometres south of Taree in the MidCoast Council Local Government Area (LGA). Jandra Quarry has been operating since 1986, with the current Development Consent (DA 231-10-99) for operations granted by the NSW Minister for Planning on 30 March 2000 (with five (5) subsequent modifications).

Holcim commissioned GHD to conduct an independent environmental audit of its Jandra Quarry (the site). The audit was conducted in accordance with Condition 8 of Schedule 5 of the Development Consent. The audit assessed the compliance status of the Jandra Quarry against the Development Consent and other relevant environmental approvals and licences, for operations since the 2016 independent environment audit (2016 IEA) site inspection (21 May 2016) to the date of the site inspection for the 2019 IEA (Tuesday, 17 September 2019).

The site component of the audit was conducted on Tuesday 17 September 2019. This report provides an outline of the audit methodology and results, and provides recommended actions for achieving full compliance with environmental approvals.

The audit was led by Elliot Holland, Senior Environmental Scientist, with technical review completed by Ben Bracken, Technical Director – Environmental Management.

Condition 8 of Schedule 5 of the Development Consent for the project requires an Independent Environmental Audit (the audit) to be commissioned by 31 March 2016, and every three (3) years thereafter. Specifically, Condition 8 requires:

“By 31 March 2016, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);*
- (d) review the adequacy of any approved strategy, plan or program required under these approvals; and*
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.*

As required by Condition 8(a) of Schedule 5 of the Development Consent, the audit team was approved by the Department of Planning, Industry and Environment (DPIE) to undertake the audit on 12 July 2019 (see Appendix A).

1.2 Scope of the audit

The audit took the following form:

- An initial start-up teleconference was held with relevant Holcim representatives to discuss the audit methodology, identify relevant personnel involved in the project, key activities and systems occurring on the site, documentation for review and to schedule a date for the site inspection.
- Relevant agencies, including the Biodiversity Conservation Trust (BCT) (formerly the Office of Environment and Heritage (OEH)), Department of Industry (Dol) – Lands & Water, Environment Protection Authority (EPA), MidCoast Council (formerly Greater Taree City Council) and the Roads and Maritime Services (Roads and Maritime) were requested to provide comment on the performance and/or compliance of the project with relevant requirements and/or approvals.
- A review of available key documentation including the Environmental Assessment (EA), Development Consent, Environment Protection Licence (EPL) and other relevant site and environmental information (such as correspondence with relevant agencies and management plans and/or monitoring results) was undertaken prior to interviews with Holcim representatives and the site inspection. Additional documents were reviewed during and following the interviews with Holcim representatives and the site inspection.
- A one-day site inspection to assess the general environmental performance of Jandra Quarry and discuss Development Consent and EPL compliance with key site-based personnel.
- Preparation of a draft audit report for Holcim to review.
- Finalisation of the audit report and submission to DPIE on behalf of Holcim.

1.3 Audit participants

The following personnel were involved over the course of the audit Table 1-1.

Table 1-1 Audit team members

Audit team members	Organisation	Role
Elliot Holland	GHD	Lead Auditor
Ben Bracken	GHD	Technical review
Shilpa Shashi	Holcim	Planning & Environment Coordinator NSW/ACT
Matt Neil	Holcim	Quarry Manager

1.4 Limitations

This report has been prepared by GHD for Holcim and may only be used and relied on by Holcim for the purpose agreed between GHD and the Holcim as set out in Sections 1.1 and 1.2 of this report.

GHD otherwise disclaims responsibility to any person other than Holcim arising in connection with this report. GHD also excludes implied warranties and conditions, to the extent legally permissible.

The services undertaken by GHD in connection with preparing this report were limited to those specifically detailed in the report and are subject to the scope limitations set out in the report.

The opinions, conclusions and any recommendations in this report are based on conditions encountered and information reviewed at the date of preparation of the report. GHD has no responsibility or obligation to update this report to account for events or changes occurring subsequent to the date that the report was prepared.

GHD has prepared this report on the basis of information provided by Holcim, which GHD has not independently verified or checked beyond the agreed scope of work. GHD does not accept liability in connection with such unverified information, including errors and omissions in the report which were caused by errors or omissions in that information.

2. Methodology

The audit process involved the interview of personnel, a review of documentation and samples of records provided by Holcim and a site inspection of the quarry operations to determine the level of environmental performance and compliance of the development with the Development Consent and the EPL. The audit process is described in more detail in Sections 2.1 to 2.5.

2.1 Audit inception

An initial start-up teleconference for the audit was held in August 2019 with relevant Holcim representatives to discuss the audit methodology, identify relevant personnel involved in the project, key activities and systems occurring on site, documentation for review and to schedule a date for the site inspection.

2.2 Document review

Environmental documentation associated with the Jandra Quarry was reviewed by the auditors prior to site visit including:

- Noise Blast Management Plan (NBMP)
- Biodiversity and Rehabilitation Management Plan (BRMP)
- Soil and Water Management Plan (SWMP)
- Air Quality Management Plan (AQMP)
- Aboriginal Cultural Heritage Management Plan (ACHMP)
- Environmental Management Strategy (EMS)
- Development Consent (DA 231-10-99)
- Environment Protection Licence (EPL No. 2796)
- Environmental Assessment
- Correspondence to/from agencies

Additional documents were provided during and following the audit as evidence of compliance with the Development Consent and EPL.

2.3 Agency consultation

As part of the audit process, the following agencies were invited to provide comment in regard to Development Consent conditions requiring specific consultation with the particular agencies, including:

- DoI – Lands & Water
- EPA
- MidCoast Council
- Biodiversity Conservation Trust (BCT) (formerly OEH)
- Roads and Maritime Services (Roads and Maritime)

Letters requesting comment from the agencies were emailed on 30 August 2019 with reminder emails issued on 6 September 2019 to agencies who had not responded.

Comments were received from EPA, MidCoast Council and BCT. Copies of this correspondence are provided in Appendix B, with a response to relevant matters provided in Section 3.5.

2.4 Site inspection and interviews

2.4.1 Opening and closing meeting

GHD undertook a site visit of the Jandra Quarry on Tuesday 17 September 2019. The auditor used the site inspection to review compliance with various environmental requirements of the project.

The opening and closing meetings were held at the Jandra Quarry main office. The list of participants is provided in Table 2-1.

Table 2-1 Opening meeting attendees

Representatives	Organisation	Role
Elliot Holland	GHD	Lead Auditor
Ben Bracken	GHD	Support Auditor
Matt Neil	Holcim	Quarry Manager

Following the opening meeting, a site inspection was undertaken of the site and operations.

The objectives of the closing meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

2.4.2 Audit interviews

During the on-site component of the audit, interviews were conducted with the Holcim Quarry Manager as identified in Table 2-1.

2.4.3 Data collection and verification

Where possible, documents and data collected during the audit process were reviewed whilst on-site. A number of documents were provided to the audit team prior to the on-site component of the audit. Several documents that were not available during the on-site component were provided following the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and/or site inspections. Where suitable verification was unable to be obtained, this has been identified.

2.4.4 Site inspection

A detailed site inspection of Jandra Quarry was undertaken on Tuesday, 17 September 2019. The following locations were inspected:

- Active quarry pit
- Pugmill and maintenance area
- Processing area and stockpiles
- Weighbridge, access road and wheel wash
- Main dam
- Hall road
- Approved 1.28 hectares vegetation clearance area
- Accessible rehabilitation areas

2.5 Reporting

This report presents the finding of the Jandra Quarry independent environmental audit required by Condition 8 of Schedule 5 of the Development Consent (DA 231-10-99) for the reporting period of 21 May 2016 to 30 June 2019.

This report summarises the findings of Holcim's compliance of the requirements of the Development Consent and EPL in Section 3. The findings are supported by Appendices detailing:

- Compliance against the Development Consent (Appendix C)
- Compliance against the EPL (Appendix D)

2.6 Definitions

As requested by DPIE, reporting results from the Independent Environmental Audit was generally determined based on the detailed in the *Independent Audit Post Approval Requirements Guideline* (DPIE, 2018).

Compliant



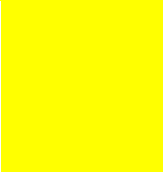

Where the auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.

Non-Compliant

The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.

Table 2-2 details the risk levels for non-compliances.

Table 2-2 Risk level for non-compliances

Risk level	Colour code	Description
High		Non-compliance with potential for significant environmental consequences, regardless of the likelihood of occurrence
Medium		Non-compliance with: <ul style="list-style-type: none">• potential for serious environmental consequences, but is unlikely to occur; or• potential for moderate environmental consequences, but is likely to occur
Low		Non-compliance with: <ul style="list-style-type: none">• potential for moderate environmental consequences, but is unlikely to occur; or• potential for low environmental consequences, but is likely to occur
Administrative Non-compliance		Only to be applied where the non-compliance does not result in any risk of environmental harm (e.g. submitting a report to government later than required under approval conditions)

Not triggered

A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

Note

A statement or fact, where no assessment of compliance is required.

3. Audit findings

3.1 Summary of Compliance

Table 3-1 presents a summary of compliance with the requirements of the Development Consent and the EPL.

Seven (7) non-compliances were deemed to represent a low risk, while 12 were deemed administrative non-compliances (ANC). For the EPL, three (3) non-compliances were deemed to represent a low risk, five were deemed ANCs.

Table 3-1 Compliance with Development Consent and EPL

Compliance	DA231-10-99 (#)	%	EPL (#2796)	%
Compliant	41	58	39	64
Non-compliant	19	27	8	13
Not triggered	10	14	14	23
Note	1	1	9	15
Total number of requirements	71	100	61	100

3.1.1 General Environmental Performance and Compliance

A site inspection was undertaken of Jandra Quarry on Tuesday, 17 September 2019. While the approval of Modification 5 was obtained on 13 March 2015, at the time of the audit production had still not increased to the production capacity approved by this modification. Nor has Jandra Quarry undertaken extraction, processing and transport operations to the approved time of 10.00 pm Monday to Friday.

Production extraction and production sales were <350,000 for all periods relevant to the 2019 IEA, which is well below the approved limit of 475,000 tonnes. In the Active Quarry Area, rehabilitation was observed along the southern, northern and eastern quarry benches areas (refer to photos within Section 3.1.2). It is noted that some of this rehabilitation pre-dates the approval of Modification 5 and was undertaken in accordance with the previous site Landscape and Rehabilitation Management Plan. However, progressive rehabilitation of RL50 was observed during the site visit with photos shown below.

Holcim demonstrated a generally high level of environmental performance during the audit, as demonstrated in the general lack of exceedances of relevant Development Consent and EPL criteria (see Appendix C and Appendix D) and photos provided in Section 3.1.2. While non-compliance with 27 conditions of the Development Consent, it is noted that 12 of these relate to administrative issues; rather than issues with the potential to affect the performance of the site. However, the following issues were noted in relation to:

- **Site water management:** During the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), and past the licensed discharge point (LDP) without being captured to settling and completion of water quality testing prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is likely leaving site in the northern-most extent of the site (via a culvert under the Pacific Highway), approximately 250 metres from the LDP.

While this water is not captured, the site visit identified that the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland potentially allows the velocity of water to reduce and assist in the settlement of suspended sediment.

Without the availability of background data for receiving waters off-site and water quality data for the water observed flowing past the LDP, the audit was unable to conclusively determine if this would represent non-compliance with the requirements of Part 5.7 and Section 120 of the *Protection of the Environment Operations Act 1997* (POEO Act). However, the audit interviews indicate the EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash, where it would be pumped to the Main Dam.

Consultation with the EPA during completion of this audit did not indicate concerns in relation to non-compliance with the requirements of Part 5.7 and Section 120 of the POEO Act. This notwithstanding, recommendations are provided in Section 4 to address this issue.

- **Air quality monitoring:** A non-compliance due to particulate matter monitoring not being undertaken until May 2017 has been found. This finding was consistent with the 2016 IEA, and as with the 2016 IEA, the risk level associated with this non-compliance is considered low for the reasons outlined in Section 3.2.2

No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site, with no exceedances identified. Furthermore, this was also reported to the EPA.

- **Noise monitoring:** Review of quarterly noise monitoring indicates that 'prevailing meteorological conditions for the monitoring period were sourced from Taree airport's meteorological station'.

With the installation of the meteorological station on-site, use of the Taree airport's meteorological station to determine prevailing meteorological conditions should be reconsidered in consultation with DPIE and the EPA.

- **Recommendations from 2016 IEA not addressed:** A number of administrative non-compliances and associated recommendations related to the 2016 IEA have not been addressed during the audit period. Therefore, the findings of non-compliance and associated recommendations remain unchanged in the 2019 IEA period (see Section 3.2.2 and Section 3.3.1).
- **Biodiversity – Offsetting:** During the 2016 IEA, correspondence was sighted provided by Holcim to the DPIE on 31 March 2016 indicating a section 88b Covenant was implemented to satisfy the requirements of this condition, with the implementation of the Biodiversity Offset Strategy commencing immediately from the submission of this correspondence. The section 88B Covenant was noted to have been agreed with DPIE on 31 March 2016 and included protection of at least 7 ha of Small-fruited Grey Gum – Tallowood shrub open forest on coastal foothills of the southern North Coast vegetation community.

Correspondence regarding the audit from OEH noted Holcim had consulted with OEH in regard to offset strategies on 31 March 2016. Holcim advised during audit interviews that an Offset Strategy has been pursued; however, there has been no further progress since the 2016 IEA.

It is noted that the 1.28 ha of vegetation approved for clearance and requiring the offset has not been subject to clearance. With the exception of not meeting the date specified by Condition 23 of Schedule 3 of DA 231-10-99, it is considered that this condition has not been triggered. Therefore, a non-compliance has not been assigned to this condition.

This notwithstanding, it is recommended that Holcim undertake further consultation with OEH and DPIE in relation to commencement of the biodiversity offset strategy, to ensure their approval for delay of implementation of the biodiversity offset strategy until such time as the 1.28 ha of vegetation has been cleared.

3.1.2 Site inspection observations

A selection of photographs from the site inspection are provided below.

	
<p>Equipment and machinery maintenance area with hardstand areas</p>	<p>Site entry point, with trucks entering and exiting observed to have covered loads</p>
	
<p>Progressive rehabilitation (in progress) on RL50 of the Active Quarry Pit – Facing generally west</p>	<p>Progressive rehabilitation (in progress) on RL50 of the Active Quarry Pit – Facing generally east</p>
	
<p>Bunded oils contained within the equipment and machinery maintenance area</p>	<p>Liquid storage facilities, located within bunding</p>



Solar lighting in the vicinity of the on-site pug mill



Broad overview of the site from southern boundary of the Active Quarry Pit – Facing north



Uncleared 1.28 ha of vegetation approved for clearance – Facing generally north



Active Pit Area at RL50, with rehabilitation of benches observed to the south and north – Facing east



LDP at the Main Dam, with dirty water observed to be flowing past without being captured, to allow sediment to settle and water quality testing to be completed prior to re-use or discharge via the LDP



Dirty water observed to be flowing down the Site Access Road, along the western base of the Main Dam, past the LDP

3.2 Compliance with Development Consent DA 231-10-99

3.2.1 Context to Compliance Assessment

Holcim were granted Modification 5 on 13 March 2016 permitting an increase in production from 250,000 tonnes to 475,000 tonnes per annum.

Holcim advised during the 2016 IEA that whilst the approved production limit has increased, site operations have not increased to reflect the new production limit. This continues to be the case during the 2019 IEA period. Therefore, there has not been an increase in the potential environmental impacts associated with an increase in production.

The quarry operations are located in a heavily forested area and are reasonably isolated, with three (3) properties located within approximately 500 m of the quarry operations and less than 10 properties located within one kilometre of the operations.

Of the three (3) closest properties, two (2) are located on Holcim-owned land. One of these properties was formerly leased; however, this was no longer the case during the 2019 IEA period. The other property is occupied by the Holcim staff. The third property is a private property for which Holcim has a noise agreement in place. Due to the distance to sensitive receivers, the potential for adverse impacts associated with environmental issues including noise, vibration and air quality is considered by the auditor to be low.

Agencies with public infrastructure relevant to the Project include:

- Roads and Maritime Services (Roads and Maritime): Asset owner for the Pacific Highway, which intersects with the Jandra Quarry access road.
- MidCoast Council: Asset owner for the on-site sewer system and relevant Local Government Area (LGA).

Further details relating to risks associated with non-conformances are provided in the detailed findings in Appendix C and Appendix D.

3.2.2 Summary of Non-Compliance

The review of compliance with the Development Consent (DA 231-10-99) identified 19 non-compliances. Seven non-compliances were deemed to represent a low risk, while 12 were deemed ANCs.

A summary of non-compliances is detailed in Table 3-2.

Table 3-2 Summary of DA 231-10-99 Non-Compliances

Condition	Reason for Non-Compliance	Risk Rating
Condition 2 of Schedule 2	<p>Holcim has demonstrated a high degree of compliance against the conditions of this development consent, as described below.</p> <p>Holcim was generally carrying out operations in accordance with previous approvals, the EA (Modification 5) and the Conditions of Consent, however a number of non-compliances (12 of which were administrative in nature) were identified in the audit as detailed below. These non-compliances were considered minor in nature as described in this table. Furthermore, the identified non-compliances were not considered to be ongoing and have not reoccurred. This is with the exception of a number of Administrative Non-Compliances (now identified as non-compliant) which have not been resolved since the 2016 iEA, resulting in a finding of non-compliance for the 2019 IEA.</p> <p>At the time of the audit, production had not increased to the production capacity approved by Modification 5.</p>	Low

Condition	Reason for Non-Compliance	Risk Rating
Condition 4 of Schedule 2	<p>During the preparation of the 2016 IEA, DPIE indicated they would like the EMS to be resubmitted following the completion of the 2016 IEA.</p> <p>Documentation was not available during the audit to verify if this was completed. Therefore a Non-Compliance (low risk) has been given in relation to this, and an updated recommendation provided below. It is noted this non-compliance is administrative in nature.</p> <p>Recommendation 01: <i>Following completion of this IEA, ensure the EMS is reviewed and updated, as relevant, and resubmitted to the Secretary for comment and approval.</i></p>	ANC
Condition 5 of Schedule 3	<p>Review of monitoring data for the 2016 Annual Review indicates nine (9) blasts were undertaken during the reporting period, with the blast overpressure on 22/03/2016 exceeding 115 dB. This constitutes approximately 11% of blasts during the 2016 reporting period and is therefore a non-compliance with this condition. This non-compliance was reported in the 2016 Annual Review.</p> <p>A finding of non-compliance (low risk) has been assigned based on the following considerations:</p> <ul style="list-style-type: none"> • As only nine (9) blast were completed during the 12 month period, any blast that exceeded the criteria automatically resulted in an exceedance in 5% of total number of blasts. Review of the subsequent blasts indicates that no further exceedances of the 115 dB(Lin Peak) occurred during the reporting period after the event on 22/03/2016. • No exceedance of the 120 dB(Lin Peak) air blast overpressure criteria has occurred. • No complaints have been received in relation to blasting during the reporting period from private or public stakeholders to indicate disturbance or damage to persons or property. <p>As review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred, no recommendation has been made in relation to this non-compliance, as it is not an ongoing issue.</p>	Low
Condition 7 of Schedule 3	<p>Review of the 2017 Annual Review indicates a number of non-compliances with the requirements of this condition:</p> <ul style="list-style-type: none"> • Three (3) blasts completed during June on 6/06, 21/06, and 27/06 • Three (3) blasts completed during July on 10/07, 24/07, and 31/07 <p>A finding of non-compliance (low risk) has been assigned based on the following considerations:</p> <ul style="list-style-type: none"> • No complaints have been received in relation to blasting during the reporting period from private or public stakeholders to indicate disturbance or damage to persons or property. • Review of the 2018 Annual Review has found the issue has not reoccurred. • No exceedance of the relevant airblast overpressure criteria has occurred during the relevant period. <p>As no further instances have occurred since the 2017 reporting period, it is considered a recommendation is not required.</p>	Low

Condition	Reason for Non-Compliance	Risk Rating
Condition 10 of Schedule 3	<p>The 2016 IEA found a non-compliance due to particulate matter monitoring not being undertaken in accordance with the requirements of this condition. Holcim have not complied with this condition during the period covered by this audit, as particulate matter monitoring did not commence until May 2017.</p> <p>Furthermore two events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019. As with the 2016 IEA, the risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> • There is only one private sensitive receiver located within close proximity to the quarry operations. • All other PM10 monitoring indicates no exceedance of relevant criteria. • Depositional dust monitoring is undertaken and is within the assessment criteria. • Review of complaints data indicates no complaints have been received. <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site. Furthermore, this was also reported to the EPA.</p> <p>Consultation with the EPA during the completion of this audit did not identify any concerns in relation to air quality impacts from the site. However, review of the 2018 Annual Review indicates a Penalty Notice and Official caution were issued on 9 August 2018, with the letter stating:</p> <p><i>On 2 July 2018, Holcim (Australia) Pty Ltd submitted an Annual Return (AR) for the reporting period 1 May 2017 to 30 April 2018. Condition M2 requires monitoring of PM10 at Point 11 (Receiver R1) every 6 days. The AR reported a non-compliance with condition M2.2 for failing to monitor PM10 at Point 11 on 14 separate occasions between 1 May 2017 and 9 November 2017. The AR noted the reason for the non-compliance was "missed the 6-day deadline for paper changeout." This represents a failure to do the required monitoring for 23 % of the time, caused by poor internal systems. In the 2016-2017 AR period Holcim (Australia) Pty Ltd also failed to monitor PM10 as per condition M2 over a 6.5-month period. On 24 May 2018 the EPA issued Holcim (Australia) Pty Ltd an Official Caution for this non-compliance.</i></p> <p>No recommendation has been made in relation to this non-compliance as this was reported in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>	Low
Condition 12 of Schedule 3	<p>As with the 2016 IEA, air quality monitoring data was initially limited to depositional dust monitoring; with particulate matter monitoring not commencing until May 2017. Furthermore, two events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019.</p> <p>Therefore, a non-compliance (low risk) with this condition has been found for the reasons stated in Condition 10.</p> <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review and particulate matter monitoring is now being undertaken on-site, with no exceedance of the relevant criteria identified during the audit.</p>	Low

Condition	Reason for Non-Compliance	Risk Rating
Condition 18 of Schedule 3	<p>During the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), past the LDP and without being captured to allow sediment to settle and water quality testing to be completed prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is likely leaving site in the northern extent of the Project area via a culvert under the Pacific Highway, approximately 250 metres from the LDP.</p> <p>Therefore, a non-compliance has been identified. A low risk has been assigned for the following reasons:</p> <ul style="list-style-type: none"> • While this water is not captured, the site visit identified the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland likely allows the velocity of water to reduce and assist in the settlement of suspended sediment. • The EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash where it would subsequently be pumped to the Main Dam. • Consultation with the EPA during completion of this audit did not indicate concerns in relation potential non-compliance with the requirements of Part 5.7 and Section 120 of the POEO Act as a relevant concern. • The Main Dam has sufficient capacity to allow this water to be captured within the approved water management system (WMS), noting discharged via the LDP has not been required for the Project. <p>Recommendation 04: <i>Ensure the dish drain and sump are constructed in consultation with, and in accordance with the requirements of, the EPA and DPIE.</i></p> <p>Recommendation 05: <i>Ensure the SWMP is updated as relevant, in consultation with the EPA and DPIE.</i></p>	Low
Condition 19 of Schedule 3	<p>This condition was generally considered during the completion of the 2016 IEA. The controls specified in the SWMP were observed to be implemented and effective, based on site observations and review of relevant monitoring records.</p> <p>Consultation with Dol Lands & Water and MidCoast Council during completion of this audit did not identify any issues with the SWMP.</p> <p>However, based on the findings of Condition 18 of Schedule 3, updates to the SWMP may be required following completion of construction of the dish drain and sump along the Main Access Road (at the western base of the Main Dam) (see Condition 18 of Schedule 3 for discussion in Table 3-2).</p> <p>Review of available documentation indicates that recommendations from the 2016 IEA relating to the SWMP have not been actioned. Therefore, non-compliance has been found and these recommendations remain relevant (refer to Recommendations 06 & 07). Relevant findings of non-compliance relate to:</p> <ul style="list-style-type: none"> • The SWMP does not include requirements relating to incident reporting associated with exceedances of monitoring criteria. • The SWMP does not include requirements, or a plan, in relation to the investigation and reporting of exceedance of performance criteria. <p>Recommendation 06: <i>Update the SWMP to include details of documentation referred to in Table 8 of the SWMP, or include Attachment 4.1H as an Appendix to the SWMP.</i></p> <p>Recommendation 07: <i>Update the SWMP to include requirements for the investigation and reporting of exceedances of water quality performance criteria in accordance with Condition 6 of Schedule 5 of DA 213-10-99.</i></p>	ANC

Condition	Reason for Non-Compliance	Risk Rating
Condition 27 of Schedule 3	<p>During the conduct of the audit no documentation or other verification was sighted to indicate that this condition has been met, with payment of the Rehabilitation and Conservation Bond required in August 2019 (i.e. within 12 months of the approval of the BRMP).</p> <p>Therefore a Non-Compliance (low risk) has been given in relation to this, and an updated recommendation provided below. It is noted this non-compliance is administrative in nature.</p> <p>Recommendation 09: <i>Ensure a Rehabilitation and Conservation Bond is lodged with DPIE as soon as practicable following submission of the 2019 IEA Report.</i></p>	ANC
Condition 29 of Schedule 3	<p>Review of the ACHMP indicates that recommendations from the 2016 IEA have not been adopted, with the 2016 IEA observing that 'detail of monitoring of all new surface disturbances in Section 7.0 of the ACHMP is only in relation to known archaeological sites and does not mention monitoring for unidentified Aboriginal objects.' Therefore, the associated recommendation is still applicable to the 2019 IEA.</p> <p>Recommendation 10: <i>Update the ACHMP to include monitoring of all new surface disturbances on site and include an unexpected finds procedure for unidentified Aboriginal objects and submit to DP&E for approval.</i></p>	ANC
	<p>Review of the ACHMP indicates no revisions have been made to the ACHMP since the 2016 IEA, with the lack of comment from Forster LALC and Purfleet-Taree LALC not addressed during this time. Documentation was not available to verify if Holcim have tried to close this out.</p> <p>While this is not considered a contributing factor to the finding of non-compliance, it is recommended Holcim liaise with Forster LALC and Purfleet-Taree LALC to close out the ACHMP.</p> <p>Recommendation 11: <i>Holcim should ensure follow-up correspondence is provided to Forster LALC and Purfleet-Taree LALC to close out Section 4.1 of the ACHMP and for any updates to the ACHMP as a result of this audit. Any comments received should be incorporated into the ACHMP and the revised ACHMP provided to the Secretary of DPIE for review and approval.</i></p>	ANC
Condition 33 of Schedule 3	<p>To track extraction and production Jandra Quarry utilises the SAP database, Holcim's national database for tracking production and stock, maintenance and inventory. Production is tracked on a monthly (as part of business review) and annual basis.</p> <p>Transportation of material is managed through a system called Command that connect to SAP, providing a report at the end of each day detailing the total number of truck movements. The daily quarry runsheet was sighted during the site visit, detailing the locations of where deliveries are being made. The latest date recorded was 16 September 2019.</p> <p>Truck movement data for 2016 and 2017 is available on the Holcim Jandra Quarry website. However, data for 2018 and Quarters 1 and 2 of 2019 are not available in accordance with Condition 33(c).</p> <p>Recommendation 12: <i>Ensure truck movement data is published on the Holcim website at the end of each calendar quarter in accordance with Condition 33(c).</i></p>	ANC
Condition 34 of Schedule 3	<p>During the conduct of the audit there was no documentation available to verify compliance with the Australian Standard, or the satisfaction of the Secretary of DPIE in relation to on-site lighting. However, it is noted that no agencies consulted during the preparation of the 2019 IEA identified lighting and visual impacts as a relevant concern.</p> <p>This is supported by no complaints being received in relation to lighting or visual impacts. Therefore, a finding of non-compliance has been made.</p> <p>Recommendation 13: <i>Ensure relevant details are provided to DPIE related to on-site lighting, including at the site intersection with the Pacific Highway. This should include evidence of the satisfaction of the Secretary of DPIE.</i></p>	ANC

Condition	Reason for Non-Compliance	Risk Rating
Condition 1 of Schedule 4	<p>Of the monitoring data recorded there was one exceedance of the relevant blasting criteria (see Condition 5 of Schedule 3); however, this exceedance was based on more than 5% of blasts exceeding the criteria detailed in Condition 5 of Schedule 3.</p> <p>Documentation was not available during the audit to verify if a notification was provided to the relevant residence.</p> <p>Recommendation 14: <i>Ensure any exceedance of Project Approval criteria are notified in writing to the affected landowner/s.</i></p>	ANC
Condition 2 of Schedule 5	<p>Review of available documentation indicates that all monitoring is being undertaken on-site generally in accordance with the requirements of this consent. Relevant exceedances of criteria have been discussed against respective conditions.</p> <p>Review of relevant documentation (i.e. Annual Reviews) indicates all exceedances have been self-reported, with relevant actions undertaken to address the identified exceedance.</p> <p>However, a finding of non-compliance (low risk) has been made in relation to a lack of PM10 monitoring until mid-2017 (as discussed in Condition 10 of Schedule 3).</p> <p>No recommendation has been made in relation to this non-compliance as this was report in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>	Low
Condition 3 of Schedule 5	<p>Review of the management plans associated with the operation of the Jandra Quarry (i.e. the BRMP, ACHMP, AQMP, NBMP and SWMP) indicate general compliance with the requirements of this condition; however, review of the SWMP and ACHMP indicate recommendations from the 2016 IEA have not been addressed, with these recommendations relating to:</p> <ul style="list-style-type: none"> • ACHMP – While Section 7.0 includes measures in the event of an unexpected Aboriginal cultural heritage item being found, it does not identify measures to be undertaken in the event of unpredicted impact on known Aboriginal cultural heritage items. • ACHMP – Does not include reference to protocol for managing incidents, complaints and non-compliances. It is noted Section 9.1 discusses Continuous Improvement, but does not address measures to be undertaken in the event of unforeseen impacts on known and/or unknown Aboriginal cultural heritage. • SWMP – Does not include reference to protocol for managing incidents, complaints, non-compliances and exceedances. It is noted Section 10.1 discusses Continuous Improvement, but does not address measures to be undertaken in the event of unforeseen impacts. <p>Therefore, non-compliance has been made in relation to these findings and recommendations from the 2016 IEA still apply (as detailed below).</p> <p>Recommendation 15: <i>Update the SWMP and ACHMP to include a procedure for addressing non-compliances.</i></p> <p>Refer to Recommendation 10 against Schedule 3, Condition 29.</p>	ANC
Condition 5 of Schedule 5	<p>As discussed in Conditions 19 and 29 of Schedule 3, a number of recommendations from the 2016 IEA have not been addressed, while as discussed in Condition 4 of Schedule 2, the EMS was not revised and resubmitted to DPIE following completion of the 2016 IEA (as requested by DPIE during the conduct of the 2016 IEA).</p> <p>Recommendation 16: <i>Ensure relevant management plans and the EMS are updated and submitted to DPIE for comment, addressing the recommendations of this audit and any subsequent comments made by DPIE as a result of review of the 2019 IEA report.</i></p>	ANC
Condition 8 of Schedule 5	<p>This audit represents the first audit since the 2016 IEA, with the 2016 audit team approved by DPIE on 30 March 2016. It is noted that commissioning for this audit did not occur until late June 2019, which is more than three (3) years since the 2016 audit.</p> <p>Recommendation 17: <i>Ensure the 2022 IEA is commissioned prior to 31 March 2022.</i></p>	ANC

Condition	Reason for Non-Compliance	Risk Rating
Condition 10 of Schedule 5	<p>Holcim has maintained the following information on its website:</p> <ul style="list-style-type: none"> Documents listed in condition 2 of Schedule 2 including the Environmental Assessment Current statutory approvals for the development (EPL and Modification) Annual review 2015 Truck movement data Monitoring data <p>The following information was not available on its web-site:</p> <ul style="list-style-type: none"> The 2018 Annual Review The most current versions of DPIE approved environmental management plans <p>No complaints have been made to date thus a complaints register is not provided on the website.</p> <p>Recommendation 18: <i>Ensure the most up-to-date versions of DPIE approved management plans and the 2018 Annual Reviews are uploaded to the Holcim website.</i></p>	ANC

3.3 Compliance with EPL 2796

3.3.1 Summary of Non-Compliance

The review of compliance with the EPL 2796 identified eight (8) non-compliances for the 2019 IEA period. Three non-compliances were deemed to represent a low risk, while the remaining five were deemed ANCs..

A summary of non-compliances is detailed in Table 3-3.

Table 3-3 Summary of EPL 2796 Non-Compliances

Condition	Reason for Non-Compliance	Risk Rating
Condition P1.1	Refer to discussion for Condition 10 of Schedule 3 of DA 231-10-99 (Table 3-2).	Low
Condition P1.3	Refer to discussion for Condition 18 of Schedule 3 of DA 231-10-99 (Table 3-2).	Low
Condition L4.6	<p>Review of quarterly noise monitoring indicates that 'prevailing meteorological conditions for the monitoring period were sourced from Taree airport's meteorological station'. With the installation of the meteorological station on-site, use of the Taree airport's meteorological station should be reconsidered in consultation with DPIE and the EPA. The risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> There is one sensitive receiver located within close proximity to the quarry operations and the receiver has signed a noise agreement relating to the quarry operations. Holcim advised that there have been no noise complaints associated with the operations. Holcim has received no noise complaints to date. <p>Recommendation 19: <i>Ensure meteorological conditions used in noise monitoring are determined based on data recorded by the on-site meteorological station.</i></p>	Low
Condition L5.2	Refer to discussion for Condition 5 of Schedule 3 of DA 231-10-99 (Table 3-2).	Low
Condition M2.2	Refer to discussion for Condition 10 of Schedule 3 (Table 3-2).	Low

Condition	Reason for Non-Compliance	Risk Rating
Condition R1.6	An Annual Return for 2018 was sighted and identified as having been submitted by the due date; however, Annual Returns for 2016 and 2017 have not been sighted for the audit and were unavailable for review. Therefore a Non-Compliance (low risk) has been given in relation to this, and a recommendation provided below. It is noted this non-compliance is administrative in nature. Recommendation 20: <i>Ensure Annual Returns are retained for a period of at least four years after submission to the EPA.</i>	ANC
Condition R4.1	Annual Returns are held centrally by the environment team for NSW. Anniversary date 1 May to 30 April. An Annual Return for 2018 was sighted; however, Annual Returns for 2016 and 2017 have not been sighted for the audit. Review of the 2018 Annual Return indicated a Noise Compliance Assessment Report and Blast Monitoring Report were not submitted with the 2018 Annual Return. Therefore a Non-Compliance (low risk) has been given in relation to this and a recommendation provided below. It is noted this non-compliance is administrative in nature. Recommendation 21: <i>Ensure Annual Returns submitted to EPA include a noise compliance assessment report and a blast monitoring report in accordance with Condition R4.1 and R4.2 of the EPL.</i>	ANC
Condition R4.2	See discussion for Condition R4.1.	ANC

3.4 Adequacy of any Strategies/Plan and Programs

Review of relevant documentations verifies that no complaints have been received in relation to the operation of the quarry and no significant incidents occurred during the audit period.

A number of recommendations are raised in the audit report as detailed in Section 4, a number of these recommendations are reproduced from the 2016 IEA, with the 2019 IEA indicating they have not been addressed during the audit period (i.e. ACHMP and SWMP). Additional updates are recommended to the SWMP to reflect the revised water management system, following construction of a dish drain and sump to transfer dirty water not currently captured to the wheel wash where it would be pumped to the Main Dam (see discussion in Section 3.1.1).

Table 3-4 provides a summary of the key monitoring and management practices on site and areas recommended for improvement.

Table 3-4 Status of key monitoring and management

Environmental aspect	Reference	Implementation	Recommendations
Blasting: overpressure and ground vibration	Noise and Vibration Management Plan (NBMP)	<p>Blast monitoring results are reported in the 2016, 2017 and 2018 Annual Review and, with the exception of the 2018 Annual Review are publically available on the Holcim website.</p> <p>Review of monitoring data for the 2016 Annual Review indicates nine (9) blasts were undertaken during the reporting period, with the blast overpressure on 22/03/2016 exceeding 115 dB. This constitutes approximately 11% of blasts during the 2016 reporting period and is therefore a non-compliance with this condition. This non-compliance was reported in the 2016 Annual Review.</p> <p>A finding of non-compliance (low risk) has been assigned against Condition 5 of Schedule 3 of DA 231-10-99 and Condition L5.2 of the EPL, based on the following considerations:</p> <ul style="list-style-type: none"> As only nine (9) blast were completed during the 12 month period, any blast that exceeded the criteria automatically resulted in an exceedance in 5% of total number of blasts. Review of the subsequent blasts indicates that no further exceedances of the 115 dB(Lin Peak) occurred during the reporting period after the event on 22/03/2016. Furthermore, review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred. No exceedance of the 120 dB(Lin Peak) airblast overpressure criteria has occurred. No complaints have been received in relation to blasting during the reporting period from private or public stakeholders to indicate disturbance or damage to persons or property. <p>It is noted that due to the limited number of blasts undertaken on-site (i.e. generally <10), this means any blast exceeding 115 dB will result in an exceedance for more than 5% of the total number of blasts during each reporting period.</p>	As review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred, no recommendation has been made in relation to this non-compliance as it is not an ongoing issue.
Noise	NBMP	<p>Review of available documentation indicates that noise monitoring is undertaken quarterly, generally in accordance with the requirements of DA 231-10-99 and EPL 2796. However, while the NBMP requires meteorological data to be sourced from the on-site meteorological station, review of quarterly noise monitoring indicates that 'prevailing meteorological conditions for the monitoring period were sourced from Taree airport's meteorological station'. With the installation of the meteorological station on-site, use of the Taree airport's meteorological station should be reconsidered in consultation with DPIE and the EPA.</p>	Recommendation 02: Ensure meteorological conditions used in noise monitoring are determined based on data recorded by the on-site meteorological station.

Environmental aspect	Reference	Implementation	Recommendations
Air Quality	Air Quality Management Plan (AQMP)	<p>A non-compliance due to particulate matter monitoring not being undertaken until May 2017 has been identified.</p> <p>Furthermore two (2) events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019.</p> <p>As with the 2016 IEA, the risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> • There is only one sensitive receiver located within close proximity to the quarry operations. • All other PM10 monitoring indicates no exceedance of relevant criteria. • Depositional dust monitoring is undertaken and is within the assessment criteria. • Review of complaints data indicates no complaints have been received during the reporting period. <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site. Furthermore, this was also reported to the EPA.</p>	<p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site. Furthermore, this was also reported to the EPA.</p>
		<p>Consultation with the EPA during the completion of this audit did not identify any concerns in relation to air quality impacts from the site. However, review of the 2018 Annual Review indicates a Penalty Notice and Official caution were issued on 9 August 2018, with the letter stating:</p> <p><i>On 2 July 2018, Holcim (Australia) Pty Ltd submitted an Annual Return (AR) for the reporting period 1 May 2017 to 30 April 2018. Condition M2 requires monitoring of PM10 at Point 11 (Receiver R1) every 6 days. The AR reported a non-compliance with condition M2.2 for failing to monitor PM10 at Point 11 on 14 separate occasions between 1 May 2017 and 9 November 2017. The AR noted the reason for the non-compliance was "missed the 6-day deadline for paper changeout." This represents a failure to do the required monitoring for 23 % of the time, caused by poor internal systems.</i></p> <p><i>In the 2016-2017 AR period Holcim (Australia) Pty Ltd also failed to monitor PM10 as per condition M2 over a 6.5-month period. On 24 May 2018 the EPA issued Holcim (Australia) Pty Ltd an Official Caution for this non-compliance.</i></p>	<p>No recommendation has been made in relation to this non-compliance as this was reported in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>
		<p>Review of the AQMP indicates it has not been revised in the 2016 IEA, this is despite significant changes to the air quality monitoring network on-site since this time, including:</p> <ul style="list-style-type: none"> • Establishment of an on-site meteorological station • Establishment of a PM10 monitoring network, which was not being undertaken the time the AQMP was prepared 	<p>Recommendation 03: Update the AQMP to ensure it accurately reflects operations on-site relating to the air quality monitoring network, ensuring the revised AQMP is provided to DPIE for approval.</p>

Environmental aspect	Reference	Implementation	Recommendations
Cultural Heritage	Aboriginal Cultural Heritage Management Plan (ACHMP)	<p>There has been no revision to the ACHMP since the 2016 IEA, with associated recommendation not addressed, therefore, this observation is still relevant and the recommendation re-produced in this audit. Therefore a Non-Compliance (low risk) has been given in relation to this. The relevant finding non-compliance relates to:</p> <ul style="list-style-type: none"> Review of the ACHMP indicated that detail of monitoring of all new surface disturbances in Section 7.0 of the ACHMP is only in relation to known archaeological sites and does not mention monitoring for unidentified Aboriginal objects. 	<p>Recommendation 10: Update the ACHMP to include monitoring of all new surface disturbance on site and include an unexpected finds procedure for unidentified Aboriginal objects and submit to DP&E for approval.</p>
		<p>Review of the ACHMP indicates no revisions have been made to the ACHMP since the 2016 IEA, with the lack of comment from Forster LALC and Purfleet-Taree LALC not addressed during this time. Documentation was not available to verify if Holcim have tried to close this out.</p>	<p>Recommendation 11: Holcim should ensure follow-up correspondence is provided to Forster LALC and Purfleet-Taree LALC to close out Section 4.1 of the ACHMP and for any updates to the ACHMP as a result of this audit. Any comments received should be incorporated into the ACHMP and the revised ACHMP provided to the Secretary of DPIE for review and approval.</p>
Water	Soil and Water Management Plan (SWMP)	<p>The controls specified in the SWMP were observed to be implemented and effective, based on site observations and review of relevant monitoring records.</p> <p>Consultation with DPI Lands & Water, EPA and MidCoast Council during completion of this audit did not identify any issues with the SWMP.</p> <p>However, review of available documentation indicates that recommendations from the 2016 IEA have not been actioned. Therefore, non-compliance has been found and these recommendations remain relevant. Relevant findings of non-compliance relate to:</p> <ul style="list-style-type: none"> The SWMP does not include requirements relating to incident reporting associated with exceedances of monitoring criteria. The SWMP does not include requirements, or a plan, in relation to the investigation and reporting of exceedance of performance criteria. 	<p>Recommendation 06: Update the SWMP to include details of documentation referred to in Table 8 of the SWMP, or include Attachment 4.1H as an Appendix to the SWMP.</p> <p>Recommendation 07: Update the SWMP to include requirements for the investigation and reporting of exceedances of water quality performance criteria in accordance with Condition 6 of Schedule 5 of DA 213-10-99.</p>
			<p>Recommendation 04: Ensure the dish drain and sump are constructed in consultation with, and in accordance with the requirements of, the EPA and DPIE.</p>

Environmental aspect	Reference	Implementation	Recommendations
		<p>During the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), past the LDP and without being captured to allow sediment to settle and water quality testing to be completed prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is likely leaving site in the northern extent of the Project area via a culvert under the Pacific Highway, approximately 250 metres from the LDP.</p> <p>Therefore, a non-compliance has been identified. A low risk has been assigned for the following reasons:</p> <ul style="list-style-type: none"> • While this water is not captured, the site visit identified the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland likely allows the velocity of water to reduce and assist in the settlement of suspended sediment. • The EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash where it would subsequently be pumped to the Main Dam. • The Main Dam has sufficient capacity to allow this water to be captured within the approved water management system (WMS), noting discharged via the LDP has not been required for the Project. 	<p>Recommendation 05: Ensure the SWMP is updated as relevant, in consultation with the EPA and DPIE.</p>
Rehabilitation / offsetting	Biodiversity and Rehabilitation Management Plan (BRMP)	<p>The Annual Reviews note progressive rehabilitation of the northern benches (RL 50) was undertaken during the reporting period. Evidence of progressive rehabilitation was sighted during the site visit (17 September 2019), with observations included in Section 3.1.2.</p> <p>During the 2016 IEA, correspondence was sighted provided by Holcim to the DPIE on 31 March 2016 indicating a section 88b Covenant was implemented to satisfy the requirements of this condition, with the implementation of the Biodiversity Offset Strategy commencing immediately from the submission of this correspondence. The section 88B Covenant was noted to have been agreed with DPIE on 31 March 2016 and included protection of at least 7 ha of Small-fruited Grey Gum – Tallowwood shrub open forest on coastal foothills of the southern North Coast vegetation community.</p> <p>Correspondence regarding the audit from OEHL noted Holcim had consulted with OEHL in regard to offset strategies on 31 March 2016. Holcim advised that an Offset Strategy has been pursued; however, there has been no further progress since the 2016 IEA.</p> <p>It is noted that the 1.28 ha of vegetation approved for clearance and requiring the offset has not been subject to clearance. With the exception of not meeting the date specified by this condition, it is considered that this condition has not been triggered. Therefore, a non-compliance has been assigned to this condition. This non-compliance is administrative in nature.</p>	<p>Not applicable.</p> <p>Recommendation 08: Undertake further consultation with OEHL and DPIE in relation to commencement of the biodiversity offset strategy, to ensure their approval for delay of implementation of the biodiversity offset strategy until such time as the 1.28 ha of vegetation has been cleared.</p>

Note: the recommendation numbering is from the detailed findings provided in Appendix C and Appendix D.

3.5 Auditor's response to matters raised by government agencies

3.5.1 Biodiversity Conservation Trust (BCT)

A letter was provided to BCT on 30 August 2019, with a subsequent response on 3 September 2019 indicating:

BCT has no comments on specific areas that BCT would like addressed during the independent audit of Jandra Quarry. BCT recommends that the audit focus on assessing the proponents success in meeting the requirements of the approval conditions for the project, related to biodiversity, Aboriginal cultural heritage and flooding matters.

This response is provided in Appendix B, while these matters have been considered in Appendix C.

3.5.2 MidCoast Council

No comments were received from MidCoast Council, with a letter provided 30 August 2019 and a subsequent reminder email sent on 6 September 2019. A reply was received on 11 September 2019 requesting a copy of the BRMP for Jandra Quarry, with a link to a copy on the Holcim website provided the same day.

Subsequent liaison received on 3 October 2019 indicated MidCoast Council did not identify any specific concerns relating to the site requiring consideration as part of the audit (see Appendix B).

3.5.3 Department of Industry (DoI) – Lands & Water

No comments were received from DoI – Lands & Water, with a letter provided 30 August 2019 and a subsequent reminder email sent on 6 September 2019.

3.5.4 Roads and Maritime Services

No comments were received from Roads and Maritime, with a letter provided 30 August 2019 and a subsequent reminder email sent on 6 September 2019.

3.5.5 Environment Protection Authority (EPA)

A letter was provided to the EPA on 30 August 2019 with a subsequent response on 2 September 2019 indicating the EPA does not provide specific input to independent audits (see Appendix B).

4. Recommendations

The following recommendations are based on the findings of the audit.

Table 4-1 Recommendations

Approval/EPL condition	ID No.	Recommendation
Condition 2 of Schedule 2	01	Following completion of this IEA, ensure the EMS is reviewed and updated, as relevant, and resubmitted to the Secretary for comment and approval.
Condition 4 of Schedule 3	02	Ensure meteorological conditions used in noise monitoring are determined based on data recorded by the on-site meteorological station.
Condition 14 of Schedule 3	03	Update the AQMP to ensure it accurately reflects operations on-site relating to the air quality monitoring network, ensuring the revised AQMP is provided to DPIE for approval.
Condition 18 of Schedule 3	04	Ensure the dish drain and sump are constructed in consultation with, and in accordance with the requirements of, the EPA and DPIE.
	05	Ensure the SWMP is updated as relevant, in consultation with the EPA and DPIE.
Condition 19 of Schedule 3	06	Update the SWMP to include details of documentation referred to in Table 8 of the SWMP, or include Attachment 4.1H as an Appendix to the SWMP.
Condition 19 of Schedule 3	07	Update the SWMP to include requirements for the investigation and reporting of exceedances of water quality performance criteria in accordance with Condition 6 of Schedule 5 of DA 213-10-99.
Condition 23 of Schedule 3	08	Undertake further consultation with OEH and DPIE in relation to commencement of the biodiversity offset strategy, to ensure their approval for delay of implementation of the biodiversity offset strategy until such time as the 1.28 ha of vegetation has been cleared.
Condition 27 of Schedule 3	09	Ensure a Rehabilitation and Conservation Bond is lodged with DPIE as soon as practicable following submission of the 2019 IEA Report.
Condition 29 of Schedule 3	10	Update the ACHMP to include monitoring of all new surface disturbances on site and include an unexpected finds procedure for unidentified Aboriginal objects and submit to DP&E for approval.
	11	Holcim should ensure follow-up correspondence is provided to Forster LALC and Purfleet-Taree LALC to close out Section 4.1 of the ACHMP and for any updates to the ACHMP as a result of this audit. Any comments received should be incorporated into the ACHMP and the revised ACHMP provided to the Secretary of DPIE for review and approval.
Condition 33 of Schedule 3	12	Ensure truck movement data is published on the Holcim website at the end of each calendar quarter in accordance with Condition 33(c) of Schedule 3.
Condition 34 of Schedule 3	13	Ensure relevant details are provided to DPIE related to on-site lighting, including at the site intersection with the Pacific Highway. This should include evidence of the satisfaction of the Secretary of DPIE.
Condition 1 of Schedule 4	14	Ensure any exceedance of Project Approval criteria are notified in writing to the affected landowner/s.
Condition 3 of Schedule 4	15	Update the SWMP and ACHMP to include a procedure for addressing non-compliances.
Condition 5 of Schedule 4	16	Ensure relevant management plans and the EMS are updated and submitted to DPIE for comment, addressing the recommendations of this audit and any subsequent comments made by DPIE as a result of review of the 2019 IEA report.
Condition 8 of Schedule 4	17	Ensure the 2022 IEA is commissioned prior to 31 March 2022.
Condition 10 of Schedule 4	18	Ensure the most up-to-date versions of DPIE approved management plans and the 2018 Annual Reviews are uploaded to the Holcim website.
Condition M8.1 of the EPL	19	Ensure documentary evidence is obtained to confirm the EPA is satisfied with monitoring during the night period not being undertaken until such time as it is relevant to operations on-site.

Approval/EPL condition	ID No.	Recommendation
Condition R1.6 of the EPL	20	Ensure Annual Returns are retained for a period of at least four years after submission to the EPA.
Condition R4.1 of the EPL	21	Ensure Annual Returns submitted to EPA by the due date and including a noise compliance assessment report and a blast monitoring report in accordance with Condition R4.1 and R4.2 of the EPL.

5. Declaration form

Independent Audit Declaration Form	
Project name	Jandra Quarry
Consent Number	231-10-99
Description of project	Refer to Section 1.1
Project address	15284 Pacific Hwy, Possum Brush NSW 2430
Proponent	Holcim (Australia) Pty Ltd
Title of audit	Jandra Quarry – Independent Environmental Compliance Audit
Date	6 December 2019


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

- the audit has been undertaken in accordance with relevant condition(s) of consent and generally in accordance with the Independent Audit Post Approval Requirements (Department 2018);
- the findings of the audit are reported truthfully, accurately and completely;
- I have exercised due diligence and professional judgement in conducting the audit;
- I have acted professionally, objectively and in an unbiased manner;
- I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

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

Name of auditor	Elliot Holland
Signature	
Qualification	Lead Auditor – Environmental Management Systems
Company	GHD Pty Ltd (GHD)
Company address	GHD Tower, Level 3, 24 Honeysuckle Drive Newcastle NSW 2300

Appendices

Appendix A – DPIE Auditor Endorsement



Ms Shilpa Shashi
Planning and Environment Coordinator NSW/ACT
Holcim (Australia) Pty Ltd
Level 8 Tower B – 799 Pacific Highway
CHATSWOOD NSW 2067

Contact: Joel Curran
Phone: 02 4904 2702
Email: compliance@planning.nsw.gov.au
joel.curran@planning.nsw.gov.au
Our Ref: DA 213-10-99 (as modified)

Cc: Ben Bracken (ben.bracken@ghd.com)

**Jandra Quarry (DA 213-10-99)
2019 Independent Environmental Audit**

Dear Ms Shashi

Reference is made to correspondence from Holcim (Australia) Pty Ltd (Holcim) dated 8 July and 10 July 2019 seeking endorsement of the audit team for the 2019 Independent Environmental Audit (IEA) required by Schedule 5, Condition 8 of Development Consent DA 213-10-99, as modified (the Consent).

The Secretary has considered Holcim's request and approves the following audit team:

- Elliot Holland – lead auditor; and
- Ben Bracken – technical review.

The Department requests two focus areas for the 2019 IEA:

- Monitoring equipment – siting, functionality and adequacy; and
- Biodiversity – in particular, offset area management.

The IEA is to be conducted in accordance with the conditions of Consent. Further, the Department requests, under Schedule 2, Condition 4, that the auditor consider the recently released Independent Audit – Post Approval Requirements (PAR), available on the Department's website, including the use of compliance descriptors "compliant", "non-compliant" or "not triggered" only (<http://www.planning.nsw.gov.au/Assess-and-Regulate/About-compliance/Compliance-policy-and-guidelines/Independent-audit-post-approval-requirements>).

The IEA period shall be 21 May 2016 (date of 2016 IEA site inspection) to the last inspection day of the 2019 IEA.

In accordance with Schedule 5, Condition 9 of the Consent, a copy of the IEA report must be submitted to the Secretary, together with a response to any auditor recommendations (RAR), within 3 months of the commissioning of the audit (site inspection date), or as otherwise agreed by the Secretary. Please note that the RAR must include target dates (DD/MM/YYYY) for implementation.

Please submit the IEA report and RAR to compliance@planning.nsw.gov.au.

Should you need to discuss the above, please contact Joel Curran as per the details provided above.

Yours sincerely

 12/7/19

Leah Cook
Team Leader - Compliance

As Nominee of the Secretary

Appendix B – Agency consultation – Responses

Ben Bracken

From: MidCoast Council <council@MidCoast.nsw.gov.au>
Sent: Friday, 30 August 2019 11:25 AM
To: Ben Bracken
Subject: Thank you

CompleteRepository: 12514398
Description: Jandra and Teven IEAs
JobNo: 12514398
OperatingCentre: 22
RepoEmail: 12514398@ghd.com
RepoType: Project

We have received your email and aim to respond to you, where necessary, within 14 days.

Would you like more information?

- * Our website is loaded with information - try using the handy Search icon in the top right of the home page
- * Need to know more about your rates? See the Your Rates<<http://www.midcoast.nsw.gov.au/Council/Your-Rates>> page on our website
- * See our Events Calendar<<http://www.midcoast.nsw.gov.au/Events>> for more information on upcoming events

Thank you for using our preferred method of correspondence.

MidCoast Council

02 6591 7222 | council@MidCoast.nsw.gov.au<<mailto:council@MidCoast.nsw.gov.au>>
MidCoast Council
www.midcoast.nsw.gov.au<<http://www.midcoast.nsw.gov.au>>

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Ben Bracken

From: Rebecca Akhurst <Rebecca.Akhurst@epa.nsw.gov.au>
Sent: Monday, 2 September 2019 1:24 PM
To: Ben Bracken
Cc: EPA RSD Hunter Region Mailbox
Subject: Jandra Quarry - Independent Environmental Compliance Audit Consultation
Attachments: 02_190830_Jandra IEA Consultation letter_EPA_7a.pdf

CompleteRepository: 12514398
Description: Jandra and Teven IEAs
JobNo: 12514398
OperatingCentre: 22
RepoEmail: 12514398@ghd.com
RepoType: Project

Hi Ben,

Thank you for your email and letter dated 30 August 2019 inviting comment from the Environment Protection Authority (EPA) in regard to GHD Pty Ltd's proposed independent environmental audit of Holcim (Australia) Pty Ltd's Jandra Quarry. The EPA encourages the undertaking of independent audits as a useful tool for industry to ensure it is meeting its environmental objectives and environment protection licences requirements.

The EPA understands that the independent environmental audit is a requirement of the quarry's development consent. The EPA does not provide specific input to independent audits and I thank you for your request.

Regards,

Rebecca Akhurst

Regional Operations Officer - Hunter

NSW Environment Protection Authority – North Branch

+61 2 4908 6807 +61 408 611 267

rebecca.akhurst@epa.nsw.gov.au www.epa.nsw.gov.au [@EPA_NSW](https://twitter.com/EPA_NSW)

Report pollution and environmental Incidents 131 555 (NSW only) or +61 2 9995 5555



Please note I work Monday, Tuesday and Wednesday

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Ben Bracken

From: Steven Cox <Steven.Cox@environment.nsw.gov.au>
Sent: Tuesday, 3 September 2019 2:52 PM
To: Ben Bracken
Subject: RE: Jandra Quarry - Independent Environmental Compliance Audit Consultation [ref:_00D7F6iTix._5007Fp2Dv4:ref]

Hi Ben,

As of 1 July 2019 the Office of Environment and Heritage (OEH) no longer exists. The Hunter Central Coast Branch and its Planning Team are now in the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment (DPIE). For now there are no changes to our contact details.

BCD has no comments on specific areas that BCD would like addressed during the independent audit of Jandra Quarry. BCD recommends that the audit focus on assessing the proponents success in meeting the requirements of the approval conditions for the project, related to biodiversity, Aboriginal cultural heritage and flooding matters.

Please note that referrals/requests should not be sent to the Environment Line, which is for the reporting of potential compliance matters. Please send any future requests for advice to rog.hcc@environment.nsw.gov.au (rather than directly to individual team members or me). Such emails will be saved in our document management system (and documents from file transfer websites will be downloaded) and will be forwarded to me within 24 hrs. If I'm on leave they will go to the Acting Team Leader (so they can't be missed or lost if someone is away).

Regards
Steven

Steven Cox
Senior Team Leader Planning
Hunter Central Coast Branch

Biodiversity and Conservation Division | Department of Planning, Industry and Environment
T 02 4927 3140 | **M** 0472 800 088 | **E** steven.cox@environment.nsw.gov.au
Level 4, 26 Honeysuckle Drive, Newcastle NSW 2300
www.dpie.nsw.gov.au



**Planning,
Industry &
Environment**

The DPIE Hunter Central Coast Branch Planning Team has a group email address: rog.hcc@environment.nsw.gov.au. Please address all further email correspondence in relation to Planning and Aboriginal cultural heritage regulation matters to this address.

The Department of Planning, Industry and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.

From: Cheryl Palmer <Cheryl.Palmer@epa.nsw.gov.au> **On Behalf Of** EPA RSD Hunter Region Mailbox
Sent: Monday, 2 September 2019 2:37 PM
To: OEH ROD Hunter Central Coast Mailbox <rog.hcc@environment.nsw.gov.au>

Subject: FW: Jandra Quarry - Independent Environmental Compliance Audit Consultation [ref:_00D7F6iTix._5007Fp2Dv4:ref]

FYI

From: Environment Line <info@environment.nsw.gov.au>
Sent: Monday, 2 September 2019 11:28 AM
To: EPA RSD Hunter Region Mailbox <hunter.region@epa.nsw.gov.au>
Subject: Jandra Quarry - Independent Environmental Compliance Audit Consultation [ref:_00D7F6iTix._5007Fp2Dv4:ref]

----- Forwarded Message -----

From: Ben Bracken [ben.bracken@ghd.com]
Sent: 30/08/2019 11:26hunter.region@epa.nsw.gov.au
To: info@environment.nsw.gov.au
Subject: Jandra Quarry - Independent Environmental Compliance Audit Consultation

To whom it may concern.

Holcim (Australia) Pty Ltd (Holcim) has also engaged GHD Pty Ltd (GHD) to undertake an independent environmental audit of the **Jandra Quarry** in accordance with Condition 8 of Schedule 5 of the Development Approval (DA 213-10-99).

Holcim has two auditable obligations within the Development Approval which require consultation with the Office of Environment and Heritage (OEH). I am writing to you to invite comment from OEH in regard to these obligations.

The site visit component of the audit is scheduled for the week commencing Monday, 16 September 2019. It would be appreciated if you could submit your written comments by Friday, 13 September 2019.

See attached letter for further details.

Kind regards,

Ben Bracken
Senior Environmental Scientist

GHD

T: 61 2 4222 2352 | F: 61 2 4222 2301 | V: 212 352 | M: 61 410 409 897 | E: ben.bracken@ghd.com
Suite 3 Level 11, 200 Crown St Wollongong 2500 NSW Australia | PO Box 5047 Wollongong 2500 | <http://www.ghd.com/>

[Water](#) | [Energy & Resources](#) | [Environment](#) | [Property & Buildings](#) | [Transportation](#)

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ref:_00D7F6iTix._5007Fp2Dv4:ref

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Ben Bracken

From: Mathew Bell <Mathew.Bell@MidCoast.nsw.gov.au>
Sent: Thursday, 3 October 2019 7:03 PM
To: Ben Bracken
Subject: FW: Jandra Quarry - Independent Environmental Compliance Audit Consultation
Attachments: 03_190830_Jandra IEA Consultation letter_MidCoast Council_8a.pdf

Ben,

I appreciate that the time required for a response to the Independent Environmental Compliance Audit Consultation has past, but I still wished to acknowledge your correspondence and reply.

I circulated your e-mail internally to relevant officers in the Council in the sections of Development Assessment, Compliance / Regulatory, Environmental Health, Transport Assets and Natural Systems. I did not get any response from these officers in relation to your audit.

As such, please conclude that Council Officers wish to raise no specific matters in relation to your audit.

Yours faithfully,

Mat

Mathew Bell

Senior Ecologist



We deliver benefits for our community in a way that adds value and builds trust

Direct

Mathew.Bell@MidCoast.nsw.gov.au

www.midcoast.nsw.gov.au or follow us 

From: Ben Bracken [<mailto:Ben.Bracken@ghd.com>]
Sent: Friday, 30 August 2019 11:25 AM
To: MidCoast Council
Subject: Jandra Quarry - Independent Environmental Compliance Audit Consultation

To whom it may concern.

Holcim (Australia) Pty Ltd (Holcim) has also engaged GHD Pty Ltd (GHD) to undertake an independent environmental audit of the **Jandra Quarry** in accordance with Condition 8 of Schedule 5 of the Development Approval (DA 213-10-99).

Holcim has three auditable obligations within the Development Approval which require consultation with the MidCoast Council (Council). I am writing to you to invite comment from Council in regard to these obligations.

The site visit component of the audit is scheduled for the week commencing Monday, 16 September 2019. It would be appreciated if you could submit your written comments by Friday, 13 September 2019.

See attached letter for further details.

Kind regards,

Ben Bracken
Senior Environmental Scientist

GHD

T: 61 2 4222 2352 | F: 61 2 4222 2301 | V: 212 352 | M: 61 410 409 897 | E: ben.bracken@ghd.com
Suite 3 Level 11, 200 Crown St Wollongong 2500 NSW Australia | PO Box 5047 Wollongong 2500 | <http://www.ghd.com/>
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Appendix C – Conditions of Approval

Number	Condition	Compliance	Evidence	Comments
	SCHEDULE 2 - ADMINISTRATIVE CONTROLS			
	<i>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</i>			
1	In addition to meeting the specific criteria in this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.	Compliant	Site observations	Holcim has demonstrated a high degree of compliance against the conditions of this development consent, as described below. There was no evidence to suggest that Holcim has not implemented all reasonable and feasible measures to prevent and/or minimise material harm to the environment as a result of the project. The controls specified in the Operational Environmental Management Plans and associated sub-plans were implemented and effective. At the time of the audit, production has not increased to the production capacity approved by Modification 5.
	TERMS OF CONSENT			
2	The Applicant shall carry out the development generally in accordance with the a) previous approvals; b) EA (Mod 5); and c) conditions of this consent. <i>Note: The general layout and stages of the development are shown on the plans in Appendix 1.</i>	Non-compliant (Low risk)	Conditions of Consent and EA	Holcim has demonstrated a high degree of compliance against the conditions of this development consent, as described below. Holcim was generally carrying out operations in accordance with previous approvals, the EA (Modification 5) and the Conditions of Consent, however a number of non-compliances have been identified in the audit as detailed below. These non-compliances were considered minor in nature as described in this table. Furthermore, where non-compliances were identified, in general they were not considered to be ongoing and have not reoccurred. At the time of the audit, production had not increased to the production capacity approved by Modification 5.
3	If there is any inconsistency between the documents identified in condition 2, the more recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	Not triggered	N/A	Not applicable.
4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; b) any reviews, reports or audits, commissioned by the Department regarding compliance with this consent; and c) the implementation of any actions or measures contained in these documents.	Non-compliant (ANC)	Documentation – 2016 IEA	During the preparation of the 2016 IEA, DPIE indicated they would like the EMS to be resubmitted following the completion of the 2016 IEA. Documentation was not available during the audit to verify if this was completed. Therefore a Non-Compliance has been given in relation to this, and an updated recommendation provided below. Recommendation 01: Following completion of this IEA, ensure the EMS is reviewed and updated, as relevant, and resubmitted to the Secretary for comment and approval.
	LIMITS OF CONSENT			
5	The Applicant may carry out quarrying operations on the site until 31 March 2045. <i>Note: Under this consent, the Applicant is required to rehabilitate the site and carry out additional undertakings to the satisfaction of the Secretary. Consequently, this consent will continue to apply in all other respects other than the right to conduct quarrying operations until the rehabilitation of the site and those undertakings have been carried out to a satisfactory standard.</i>	Not triggered	N/A	Not applicable.
6	The Applicant shall not carry out quarrying operations below a level of RL 20 m AHD.	Compliant	Site observations Development plan	During the site interviews, it was stated that quarterly drone surveys are completed by Measure Australia, with extraction currently only down to RL 35m AHD. A sample of the most recently completed drone survey was sighted (5 September 2019). The development plan for the quarry is staged in 50,000 tonne segments and is still currently at Stage 5 of 14, as per the findings of the 2016 IEA. The development plan was sighted, dated 14 October 2014 and prepared by Australian Mine and Development Pty Ltd.
7	The Applicant shall not extract more than 16.5 million tonnes of quarry products from the site under this consent.	Compliant	Documentation – Annual Reviews and Project Environmental Assessment Site interviews	Review of the <i>Jandra Quarry Intensification in Production Environmental Assessment</i> (Element Environment, 2014) indicates that at the time of exhibition (August 2014) Holcim had extracted and processed approximately 3 million tonnes, with current production well below 16.5 million tonnes. To track extraction and production Jandra Quarry utilises the SAP database, Holcim's national database for tracking production and stock, maintenance and inventory. Production is tracked on a monthly (as part of business review) and annual basis. This system is noted to still be used in 2019.

Number	Condition	Compliance	Evidence	Comments																
8	The Applicant shall not extract more than 490,000 tonnes of quarry products from the site in any calendar year.	Compliant	Documentation – Annual Reviews 2016-2019 Site interviews	The production volume for the 2016, 2017 and 2018 Reporting Periods were well below 350,000 tonnes. To track extraction and production Jandra Quarry utilises the SAP database, Holcim's national database for tracking production and stock, maintenance and inventory. Production is tracked on a monthly (as part of business review) and annual basis. It was noted during site interviews that the plant is only capable of producing 350,000 tonnes per year and a mobile crusher would be required to expand extraction and production volume.																
9	The Applicant shall not transport more than 475,000 tonnes of quarry products from the site in any calendar year.	Compliant	Documentation – Annual Review Site interviews Quarry runsheet sample	The production volume for the 2016, 2017 and 2018 Reporting Periods were well below 350,000 tonnes. To track extraction and production Jandra Quarry utilises the SAP database, Holcim's national database for tracking production and stock, maintenance and inventory. Production is tracked on a monthly (as part of business review) and annual basis. Transportation of material is managed through a system called Command that connects to SAP, providing a report at the end of each day detailing the total number of truck movements. The daily quarry run-sheet (Google Drive document) was sighted during the site visit, detailing the locations of where deliveries are being made.																
HOURS OF OPERATION																				
10	<p>The Applicant shall comply with the operating hours in Table 1.</p> <table border="1"> <thead> <tr> <th>Day</th> <th>Extraction and processing operations</th> <th>Transport operations</th> <th>Asphalt Plant and associated transport (on a campaign basis)</th> </tr> </thead> <tbody> <tr> <td>Monday – Friday</td> <td>6 am to 10 pm</td> <td>6 am to 10 pm</td> <td>24 hours a day</td> </tr> <tr> <td>Saturday</td> <td>6 to 6 pm</td> <td>6 am to 10 pm</td> <td>24 hours a day</td> </tr> <tr> <td>Sundays and Public Holidays</td> <td>Non</td> <td>None</td> <td>24 hours a day</td> </tr> </tbody> </table> <p>The following activities may be carried out on the site outside the hours specified in Table 1</p> <ul style="list-style-type: none"> a) return of trucks to the site prior to 12 midnight Monday to Saturday; b) delivery or dispatch of materials as requested by Police, Fire Brigade or other similar authorities; and c) emergency work to avoid the loss of lives, property and/or to prevent environmental harm. <p>In circumstances outlined in (b) and (c), the Applicant shall notify the Secretary and affected residents prior to undertaking the activities, or as soon as is practical thereafter.</p>	Day	Extraction and processing operations	Transport operations	Asphalt Plant and associated transport (on a campaign basis)	Monday – Friday	6 am to 10 pm	6 am to 10 pm	24 hours a day	Saturday	6 to 6 pm	6 am to 10 pm	24 hours a day	Sundays and Public Holidays	Non	None	24 hours a day	Compliant	Documentation – Annual Review Site interviews	Review of 2016, 2017 and 2018 Annual Reviews indicates no activities were undertaken outside of approved operating hours. Operating hours are addressed in Table 2 of the EMS. It was noted during the site interview that extraction and processing do not commence until after 7.00 am, with toolbox talks undertaken prior. The mobile asphalt plant was decommissioned prior to the 2016 IEA and is no longer relevant to operations on-site. No complaints have been received in relation to vehicles accessing the site out of hours, nor did any of the agencies consulted during the preparation of this IEA identify out of hours operation as an issue.
Day	Extraction and processing operations	Transport operations	Asphalt Plant and associated transport (on a campaign basis)																	
Monday – Friday	6 am to 10 pm	6 am to 10 pm	24 hours a day																	
Saturday	6 to 6 pm	6 am to 10 pm	24 hours a day																	
Sundays and Public Holidays	Non	None	24 hours a day																	
STRUCTURAL ADEQUACY																				
11	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	Not triggered	N/A	Not applicable. No new buildings relevant to this condition have been constructed during the audit period.																
DEMOLITION																				
12	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version	Not triggered	N/A	Not applicable. No demolition relevant to this condition has been undertaken during the audit period.																
PROTECTION OF PUBLIC INFRASTRUCTURE																				
13	<p>The Applicant shall:</p> <ul style="list-style-type: none"> (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <p>Note: This condition does not apply to damage to roads caused as a result of general road usage.</p>	Not triggered	Site interviews. Site inspection	Holcim advised that there has not been any damage to public infrastructure or utilities to date associated with the quarry operations. Neither Council or RMS identified damage to public infrastructure as an issue relevant to consideration in the IEA.																

Number	Condition	Compliance	Evidence	Comments
	OPERATION OF PLANT AND EQUIPMENT			
14	The Applicant shall ensure that all the plant and equipment used at the site is maintained and operated in a proper and efficient manner.	Compliant	Maintenance Plan sample Plant maintenance record sample Pre-start checklist sample Site interviews Documentation – Annual Review	During the site interviews, it was stated that daily, weekly and monthly inspections of plant and equipment are undertaken with checklists for each. A maintenance plan was sighted in the main office detailing “who, what, when and where”, which is a site based document (Google Drive document). From the monthly inspections, tasks are allocated and necessary parts ordered. The maintenance day form is signed off by the Quarry Manager and the Site Supervisor and goes into a spreadsheet to track history. These documents track each piece of equipment on site separately, including separation into mobile and static equipment. A plant maintenance record was sighted during the site visit. It was noted during site interviews that hours for equipment are tracked on a daily basis (pre-start checklist) and this is tracked on weekly basis for annual servicing requirements, which are completed on-site by a qualified diesel mechanic in a hard-stand area. Further, it was noted that in an effort to minimise the risk of hydraulic hose failures, a maintenance program for hydraulic hoses has been implemented, with inspections completed on a daily basis as part of pre-start checklists. During the site visit, copy of pre-start checklists for machines were sighted which detailed the start date, operating hours, and machine details and also included a checklist to be completed by the operator. In regard to training, it was noted that initial inductions include a level 1 environmental induction. Environmental awareness/training was also noted to be undertaken during toolbox talks, spill kit response training sessions. The Quarry Manager noted the PIRMP is tested each year. The PIRMP was completed 20 February 2019, as verified via review of the 2018 Annual Return.
	STAGED SUBMISSION OF ANY STRATEGY, PLAN OR PROGRAM			
15	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and (b) combine any strategy, plan or program required by this consent with any similar strategy, plan or program required for the development. To ensure these strategies, plans or programs are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. <i>Notes:</i> <ul style="list-style-type: none"> While any strategy, plan or program may be submitted on a progressive basis, the Applicant will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times. If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program. 	Compliant	2016 IEA Report	All management plans required by the Project Approval were submitted on or before the due date for submission, as noted in the 2016 IEA.
	IDENTIFICATION OF APPROVED LIMITS OF EXTRACTION			
16	Prior to 31 August 2015, the Applicant shall: (a) engage a registered surveyor to mark out the boundaries of the approved area of extraction and the boundaries of the approved infrastructure area; and (b) submit a survey plan of these boundaries to the Secretary.	Note	Documentation – Annual Review Site interviews	During the site interviews, it was noted that no issues were raised by DPIE since completion of the 2016 IEA. 2016 IEA considerations: As noted in the 2016 IEA, survey of the extraction limit was completed in 2010, with a survey plan from registered surveyors McGlashan & Crisp provided. It was noted that the 2015 modification did not change the extraction limit. The survey was submitted to DPIE as part of the 2015 Annual Review, outside the 31 August 2015 due date. However, this condition was considered as part of the 2016 IEA and compliance or otherwise is not required.
17	The Applicant shall ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify the location of these boundaries and that quarrying operations are contained within the approved areas.	Compliant	Site interviews Site inspection	During the site interview it was noted that Jandra Quarry is marked out to the Holcim boundary marking standard (required for every site). Markers indicating the site boundary were observed during the site visit.
	PRODUCTION DATA			
18	The Applicant shall provide annual quarry production data to DRE using the standard form for that purpose; and report these data in the Annual Review (see condition 4 of Schedule 5).	Compliant	Site interviews Documentation – Standard forms submission documentation	Annual Returns for the audit period were sighted during the preparation of this audit report.

Number	Condition	Compliance	Evidence	Comments																																				
	SCHEDULE 3 – ENVIRONMENTAL PERFORMANCE CONDITIONS																																							
	<i>NOISE – Noise Criteria</i>																																							
1	<p>The Applicant shall ensure that the noise generated by the development does not exceed the criteria in Table 2 or Table 3 at any residence on privately-owned land.</p> <p>Table 2 – Noise criteria – quarrying operations only dB(A)</p> <table border="1"> <thead> <tr> <th>Location</th> <th>6 am – 10 pm (L_{Aeq}(15 min))</th> </tr> </thead> <tbody> <tr> <td>R1</td> <td>46</td> </tr> <tr> <td>R5</td> <td>40</td> </tr> <tr> <td>R2, R4, R6</td> <td>36</td> </tr> <tr> <td>R7</td> <td>35</td> </tr> </tbody> </table> <p>Table 3 – Noise criteria – quarrying operations & asphalt plant production combined dB(A)</p> <table border="1"> <thead> <tr> <th rowspan="2">Location</th> <th rowspan="2">6 am – 10 pm (L_{Aeq}(15 min))</th> <th colspan="2">10 pm – 6 am</th> </tr> <tr> <th>(L_{Aeq}(15 min))</th> <th>(L_{A1}(1 min))</th> </tr> </thead> <tbody> <tr> <td>R1</td> <td>48</td> <td>46</td> <td>51</td> </tr> <tr> <td>R5</td> <td>41</td> <td>39</td> <td>51</td> </tr> <tr> <td>R4</td> <td>40</td> <td>39</td> <td>51</td> </tr> <tr> <td>R2, R6</td> <td>40</td> <td>35</td> <td>48</td> </tr> <tr> <td>R7</td> <td>36</td> <td>35</td> <td>48</td> </tr> </tbody> </table> <p>Notes:</p> <ul style="list-style-type: none"> Receiver locations are shown on the figure in Appendix 2. Condition 10 of Schedule 2 prohibits quarrying operations during the hours 10 pm – 6 am. <p>Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (as may be updated from time-to-time). Appendix 3 details the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria.</p> <p>However, these criteria do not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Location	6 am – 10 pm (L _{Aeq} (15 min))	R1	46	R5	40	R2, R4, R6	36	R7	35	Location	6 am – 10 pm (L _{Aeq} (15 min))	10 pm – 6 am		(L _{Aeq} (15 min))	(L _{A1} (1 min))	R1	48	46	51	R5	41	39	51	R4	40	39	51	R2, R6	40	35	48	R7	36	35	48	Compliant	<p>Documentation – Annual Review, Copy of most recent version of Noise Agreement</p> <p>Site interviews</p> <p>Agency consultation</p>	<p>During interviews, it was noted the only issue was in relation to access at one residence for monitoring, which was unable to be achieved during initial monitoring due to the residence being a holiday home and Holcim struggling to contact the owner. It is understood this issue has been resolved.</p> <p>Consultation with the EPA during completion of the audit did not identify any issues regarding compliance with noise criteria, with the on-site interviews also indicating an EPA inspection was recently completed.</p> <p>Review of available documentation indicates that noise monitoring is undertaken quarterly, generally in accordance with the requirements of this condition.</p>
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	<i>NOISE – Additional Noise Mitigation Upon Request</i>																																							
2	<p>Upon receiving a written request from the owner of any residence on property R1 the Applicant shall implement additional noise mitigation measures (such as double glazing, insulation, or air conditioning) at the residence in consultation with the owner. These measures must be reasonable and feasible and directed towards reducing the noise impacts of the project on the residence.</p> <p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>However, the obligation to implement noise mitigation measures does not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land that sets aside noise mitigation measures under the terms of this consent, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Not triggered	N/A	Not applicable, no request has been received.																																				
	<i>NOISE – Operating Conditions</i>																																							

Number	Condition	Compliance	Evidence	Comments
3	<p>The Applicant shall:</p> <p>(a) implement best practice management to minimise the construction, operational and transportation noise of the development;</p> <p>(b) minimise the noise impacts of the development during meteorological conditions when the noise limits in this consent do not apply (see Appendix 3);</p> <p>(c) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent; and</p> <p>(d) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Secretary.</p>	Non-compliant (Low risk)	Documentation – NBMP Site interviews	<p>Review of quarterly noise monitoring indicates that 'prevailing meteorological conditions for the monitoring period were sourced from Taree airport's meteorological station'. With the installation of the meteorological station on-site, use of the Taree airport's meteorological station should be reconsidered in consultation with DPIE and the EPA.</p> <p>The risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> There is one sensitive receiver located within close proximity to the quarry operations and the receiver has signed a noise agreement relating to the quarry operations. Holcim advised that there have been no noise complaints associated with the operations. <p>It is noted however that:</p> <ul style="list-style-type: none"> Noise management and mitigation measures are detailed in the NBMP. Correspondence from the DP&E dated 14 March 2016 indicates the Secretary was satisfied the NBMP generally meets the requirements of the Project Approval. <p>It was noted during the site interviews that:</p> <ul style="list-style-type: none"> Noise impacts are reviewed during adverse meteorological conditions. All machines run with residential mufflers. Meteorological conditions are reviewed prior to blasting. Boundary 'audible noise' checks are undertaken to check if noise is audible. Holcim has received no noise complaints to date. <p>Recommendation 02: <i>Ensure meteorological conditions used in noise monitoring are determined based on data recorded by the on-site meteorological station.</i></p>
4	<p>The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> compliance with the noise criteria in this consent; best management noise minimisation practice is employed on site; noise emissions from trucks on the site after 10 pm do not annoy neighbouring residents; and the noise impacts of the development are minimised during any meteorological conditions when the noise limits in this consent do not apply; and <p>(c) detail a monitoring program that will be put in place to measure noise from the development against the noise criteria in Table 2 and 3, and which:</p> <ul style="list-style-type: none"> includes quarterly attended monitoring for the first two years of each of the three Stages of the development, as shown in the three figures in Appendix 1 (this monitoring must take place within a 24 hour asphalt campaign, if any such campaign is conducted during the quarter), and thereafter annually unless the Secretary agrees otherwise; and evaluates and reports on the effectiveness of the noise management system on site. 	Compliant	Documentation – NBMP	<p>This condition was generally considered during the completion of the 2016 IEA. The controls specified in the NBMP were observed implemented and effective, based on site observations and review of relevant monitoring records.</p> <p>The current NBMP is Rev D revised on 20 August 2018.</p> <p>2016 IEA considerations:</p> <p>Sighted letter of submission to the Secretary of DPIE dated 31 August 2015.</p> <p>Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the NBMP generally meets the requirements of the Project Approval.</p>

Number	Condition	Compliance	Evidence	Comments												
	BLASTING – Blasting Impact Assessment Criteria															
5	<p>The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 4.</p> <p>Table 4: Blasting criteria</p> <table border="1"> <thead> <tr> <th>Location</th> <th>Airblast overpressure (dB(Lin Peak))</th> <th>Ground vibration (mm/s)</th> <th>Allowable exceedance</th> </tr> </thead> <tbody> <tr> <td>Any residence on privately owned land, or any public infrastructure</td> <td>120</td> <td>10</td> <td>0%</td> </tr> <tr> <td></td> <td>115</td> <td>5</td> <td>5% of the total number of blasts over a period of 12 months</td> </tr> </tbody> </table> <p>However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 4, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Any residence on privately owned land, or any public infrastructure	120	10	0%		115	5	5% of the total number of blasts over a period of 12 months	Non-compliant (Low Risk)	Documentation – Monitoring Data. Site interviews.	<p>Review of monitoring data for the 2016 Annual Review indicates nine (9) blasts were undertaken during the reporting period, with the blast overpressure on 22/03/2016 exceeding 115 dB. This constitutes approximately 11% of blasts during the 2016 reporting period and is therefore a non-compliance with this condition. This non-compliance was reported in the 2016 Annual Review.</p> <p>A finding of non-compliance (low risk) has been assigned based on the following considerations:</p> <ul style="list-style-type: none"> As only nine (9) blast were completed during the 12 month period, any blast that exceeded the criteria automatically resulted in an exceedance in 5% of total number of blasts. Review of the subsequent blasts indicates that no further exceedances of the 115 dB(Lin Peak) occurred during the reporting period after the event on 22/03/2016. Furthermore, review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred. No exceedance of the 120 dB(Lin Peak) airblast overpressure criteria has occurred. No complaints have been received in relation to blasting during the reporting period from private or public stakeholders to indicate disturbance or damage to persons or property. <p>As review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred, no recommendation has been made in relation to this non-compliance, as it is not an ongoing issue.</p>
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance													
Any residence on privately owned land, or any public infrastructure	120	10	0%													
	115	5	5% of the total number of blasts over a period of 12 months													
	BLASTING – Blasting Hours															
6	The Applicant shall only carry out blasting on site between 9 am and 5 pm Monday to Friday and 9 am to 3 pm Saturday. No blasting is allowed on Sundays or public holidays, or at any other time without the written approval of the Secretary.	Compliant	Site interviews. Documentation – Daily blasting checklist, monitoring data.	<p>It was noted during the site interview that blasting was in compliance with this condition, with review of monitoring records supporting this.</p> <p>Sighted daily blasting checklist detailing: time of blast, day, shotfirer, shot number, weather conditions and checklist for shotfirer to sign off on, space for comments by shotfirer, details shotfirer's licence number and signed off by the Quarry Manager.</p> <p>It was noted during the site interview that the shotfirer brings equipment to site when blasting and no explosives are stored on site.</p>												
	BLASTING – Blasting Frequency															
7	<p>The Applicant may carry out a maximum of 2 blasts per month on site. This condition does not apply to blasts required to ensure the safety of the quarry or workers on site.</p> <p><i>Note: For the purposes of this condition a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the quarry.</i></p>	Non-compliant (Low Risk)	Documentation – Monitoring Data	<p>Review of the 2017 Annual Review indicates a number of non-compliances with the requirements of this condition:</p> <ul style="list-style-type: none"> Three (3) blasts completed during June on 6/06, 21/06, and 27/06. Three (3) blasts completed during July on 10/07, 24/07, and 31/07. <p>A finding of non-compliance (low risk) has been assigned based on the following considerations:</p> <ul style="list-style-type: none"> Review of the 2018 Annual Review has found the issue has not reoccurred. No exceedance of the relevant airblast overpressure criteria (Condition 10) has occurred during the relevant period. No complaints have been received in relation to blasting during the reporting period from private or public stakeholders to indicate disturbance or damage to persons or property. <p>As review of monitoring for the 2018 Annual Review indicate no occurrences, no recommendation has been made in relation to this non-compliance, as it is not an ongoing issue.</p>												

Number	Condition	Compliance	Evidence	Comments
	<i>BLASTING – Operating Conditions</i>			
8	<p>The Applicant shall:</p> <p>(a) implement best management practice to:</p> <ul style="list-style-type: none"> protect the safety of people and livestock in the areas surrounding blasting operations, protect public or private infrastructure/property in the surrounding area from damage from blasting operations; protect the Pacific Highway from flyrock from blasting operations; and minimise the dust and fume emissions of any blasting; <p>(b) operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and</p> <p>(c) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.</p>	Compliant	<p>Documentation – NBMP</p> <p>Site interviews</p> <p>Documentation – Letter from DPIE</p>	<p>Controls to minimise impacts of blasting were detailed in Section 7.0 and Appendix A of the NBMP. The Blast Management Procedure (Appendix A of the NBMP) includes the requirement that, prior to loading a shot, verbal notification will be given to neighbours advising them of the approximate time of the blast with Appendix 4 of the Blast Management Procedure providing their contact details. Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the NBMP generally meets the requirements of the Project Approval.</p> <p>Recommendation 03 from the 2016 IEA has been addressed with neighbours advised via a Telstra message 24 hours beforehand.</p> <p>Monitoring is undertaken in accordance with the Blast Management Procedure in the NBMP, with blast monitoring results were reported in the Annual Reviews and are publically available on the Holcim website (http://www.holcim.com.au/sustainability/environment/pollution-monitoring-data.html).</p> <p>While one exceedance was recorded during the 2016 reporting period, it is not considered to be an ongoing issue (see Condition 7 for discussion).</p>
9	<p><i>BLASTING – Blast Management Plan</i></p> <p>The Applicant shall prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(b) describe the measures that would be implemented to ensure compliance with the blast criteria and operating conditions of this consent;</p> <p>(c) include a monitoring program for evaluating and reporting on compliance with the blasting criteria in this consent;</p> <p>(d) include a blast fume management protocol to demonstrate how emissions will be minimised including risk management strategies if blast fumes are generated;</p> <p>(e) include public notification procedures on the blasting schedule; and</p> <p>(f) include a protocol for investigating and responding to complaints.</p>	Compliant	<p>Documentation – Letter from DPIE</p> <p>Documentation – Letter of Submission</p> <p>Documentation – NBMP, including Blast Fume Code of Practice</p> <p>Site interviews</p>	<p>This condition was generally considered during the completion of the 2016 IEA. The controls specified in the NBMP were observed to be implemented and effective, based on site observations and review of relevant monitoring records.</p> <p>2016 IEA considerations</p> <p>Sighted letter of submission to the Secretary of DPIE dated 31 August 2015.</p> <p>Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the NBMP generally meets the requirements of the Project Approval.</p> <p>Recommendation 04 from the 2016 IEA has been addressed in a revised version of the NBMP</p>
	<i>AIR QUALITY – Air Quality Impact Assessment Criteria</i>			

Number	Condition	Compliance	Evidence	Comments																							
10	<p>The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Tables 5, 6 and 7 at any residence on privately-owned land.</p> <p>Table 5: Long-term impact assessment criteria for particulate matter</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>^dCriterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) Matter</td> <td>Annual</td> <td>^a 90 µg/m³</td> </tr> <tr> <td>Particulate Matter < 10µm (PM₁₀)</td> <td>Annual</td> <td>^a 30 µg/m³</td> </tr> </tbody> </table> <p>Table 6: Short-term impact assessment criteria for particulate matter</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>^dCriterion</th> </tr> </thead> <tbody> <tr> <td>Particulate Matter < 10µm (PM₁₀)</td> <td>24 hour</td> <td>^a 50 µg/m³</td> </tr> </tbody> </table> <p>Table 7: Long-term impact assessment criteria for deposited dust</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>Deposited dust</td> <td>Annual</td> <td>^b 2 gm/m²/month</td> <td>^a 4 gm/m²/month</td> </tr> </tbody> </table> <p>Notes for Tables 5 to 7</p> <p>a. Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources);</p> <p>b incremental impact (i.e. incremental increase in concentrations due to the development on its own);</p> <p>c. Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580 10 1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and</p> <p>d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog fire incidents, illegal activities or any other activity agreed to by the Secretary in consultation with the EPA</p>	Pollutant	Averaging Period	^d Criterion	Total suspended particulate (TSP) Matter	Annual	^a 90 µg/m ³	Particulate Matter < 10µm (PM ₁₀)	Annual	^a 30 µg/m ³	Pollutant	Averaging Period	^d Criterion	Particulate Matter < 10µm (PM ₁₀)	24 hour	^a 50 µg/m ³	Pollutant	Averaging Period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	^b 2 gm/m ² /month	^a 4 gm/m ² /month	Non-compliant (Low Risk)	<p>Documentation- AQMP and Annual Review, monthly boundary check (for August 2019)</p> <p>DPIE's approval of PM10 monitoring locations and commencement of monitoring</p> <p>Monitoring records</p>	<p>The 2016 IEA found a non-compliance due to particulate matter monitoring not being undertaken in accordance with the requirements of this condition. Holcim have not complied with this condition during the period covered by this audit, as particulate matter monitoring did not commence until May 2017.</p> <p>Furthermore two events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019.</p> <p>As with the 2016 IEA, the risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> There is only one sensitive receiver located within close proximity to the quarry operations. All other PM10 monitoring indicates no exceedance of relevant criteria. Depositional dust monitoring is undertaken and is within the assessment criteria. Review of complaints data indicates no complaints have been received. <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site. Furthermore, this was also reported to the EPA.</p> <p>Consultation with the EPA during the completion of this audit did not identify any concerns in relation to air quality impacts from the site. However, review of the 2018 Annual Review indicates a Penalty Notice and Official caution were issued on 9 August 2018, with the letter stating:</p> <p><i>On 2 July 2018, Holcim (Australia) Pty Ltd submitted an Annual Return (AR) for the reporting period 1 May 2017 to 30 April 2018. Condition M2 requires monitoring of PM10 at Point 11 (Receiver R1) every 6 days. The AR reported a non-compliance with condition M2.2 for failing to monitor PM10 at Point 11 on 14 separate occasions between 1 May 2017 and 9 November 2017. The AR noted the reason for the non-compliance was "missed the 6-day deadline for paper changeout." This represents a failure to do the required monitoring for 23 % of the time, caused by poor internal systems.</i></p> <p><i>In the 2016-2017 AR period Holcim (Australia) Pty Ltd also failed to monitor PM10 as per condition M2 over a 6.5-month period. On 24 May 2018 the EPA issued Holcim (Australia) Pty Ltd an Official Caution for this non-compliance.</i></p> <p>No recommendation has been made in relation to this non-compliance as this was reported in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>
Pollutant	Averaging Period	^d Criterion																									
Total suspended particulate (TSP) Matter	Annual	^a 90 µg/m ³																									
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Deposited dust	Annual	^b 2 gm/m ² /month	^a 4 gm/m ² /month																								
	AIR QUALITY - Odour																										
11	The Applicant shall not cause or permit the emission of offensive odour beyond the boundaries of the site.	Compliant	Documentation- AQMP and 2016-2018 Annual Reviews	The 2016, 2017, and 2018 Annual Reviews did not identify any odour related issues or complaints for the reporting period. Section 7.0 of the Air Quality Management Plan (AQMP) includes monitoring and mitigation measures in regard to odour. No complaints have been received in relation to odour from site.																							
	AIR QUALITY – Operating Conditions																										
12	<p>The Applicant shall:</p> <p>(a) implement best practice management to minimise the odour and dust emissions of the development;</p> <p>(b) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent;</p> <p>(c) regularly assess air quality monitoring data and relocate, modify and/or stop operations on site to ensure compliance with the air quality criteria in this consent;</p> <p>(d) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see noted under Table 7); and</p> <p>(e) minimise the area of surface disturbance and maximise progressive rehabilitation of the site,</p>	Non-compliant (Low Risk)	<p>Documentation- AQMP</p> <p>Documentation- AQMP, Annual Review, Dust Deposition monitoring data</p> <p>Site interviews</p>	<p>Addressed in Section 7.0 of the AQMP.</p> <p>Refer to Condition 10.</p> <p>As with the 2016 IEA, air quality monitoring data was limited to depositional dust monitoring; with particulate matter monitoring not commencing until May 2017, a non-compliance (low risk) with this condition has been found for the reasons stated in Condition 10.</p> <p>Furthermore, two events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019.</p> <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review and particulate matter monitoring is now being undertaken on-site, with no exceedance of the relevant criteria identified during the audit.</p>																							

Number	Condition	Compliance	Evidence	Comments
	<i>AIR QUALITY – Quarry-owned Land</i>			
13	<p>The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Tables 5, 6, and 7 at any occupied residence on quarry-owned land unless:</p> <p>(a) the tenant has been notified of any health risks associated with such exceedances in accordance with the notification requirements under Schedule 4 of this consent;</p> <p>(b) the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice;</p> <p>(c) air quality monitoring is regularly undertaken to inform the tenant of the actual particulate emissions at the residence; and</p> <p>(d) data from this monitoring is presented to the tenant in an appropriate format for a medical practitioner to assist the tenant in making informed decisions on health risks associated with occupying the property, to the satisfaction of the Secretary.</p>	Compliant	<p>Documentation – Checklist of Preventative Maintenance.</p> <p>Evidence tenant notified of health risks</p> <p>Site interviews</p>	<p>Holcim advised that on warm weather days the rock material is wet down and three (3) dust collectors installed within the plant are operated. Holcim advised the dust collectors are serviced every 6 months.</p> <p>Holcim advised there are no longer any residents within any residences on quarry-owned land, with the exception of the Quarry Manager who lives in one quarry-owned residence who is aware of associated risks. Therefore, Recommendation 7 from the 2016 IEA is no longer relevant, as all quarry-owned land is now vacant.</p>
	<i>AIR QUALITY – Air Quality Management Plan</i>			
14	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> compliance with the relevant conditions of this consent; best practice management is employed; and the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events; <p>(c) describe the proposed air quality management system; and</p> <p>(d) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> is capable of evaluating the performance of the development; includes a protocol for determining any exceedances of the relevant conditions of consent; effectively supports the air quality management system; and evaluates and reports on the adequacy of the air quality management system. 	Compliant	<p>Documentation – Letter from DPIE</p> <p>Documentation – Letter of Submission</p>	<p>2016 IEA considerations</p> <p>Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the AQMP generally meets the requirements of the Project Approval. Sighted letter of submission to the Secretary of DPIE dated 31 August 2015.</p> <p>2019 IEA considerations</p> <p>This condition was generally considered during the completion of the 2016 IEA. As it was raining during the site visit, observations were unavailable in relation to air quality management (i.e. dust control). However, based on review of monitoring records and other relevant documentation, the controls specified in the AQMP were observed to be implemented and effective.</p> <p>Furthermore, review of the AQMP indicates it has not been revised in the 2016 IEA, this is despite significant changes to the air quality monitoring network on-site since this time, including:</p> <ul style="list-style-type: none"> Establishment of an on-site meteorological station Establishment of a PM10 monitoring network <p>While a recommendation has been made to review and revise the AQMP, a finding of compliance has still been made.</p> <p>Recommendation 03: Update the AQMP to ensure it accurately reflects operations on-site relating to the air quality monitoring network, ensuring the revised AQMP is provided to DPIE for approval.</p>
	<i>AIR QUALITY – Meteorological Monitoring</i>			
15	<p>For the life of the development, the Applicant shall ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline.</p>	Compliant	<p>Documentation – Annual Review</p> <p>Written notification of installation of meteorological station</p> <p>Site interviews</p>	<p>Review of the 2016 Annual Review indicates compliance with this condition.</p>
	<i>AIR QUALITY – Greenhouse Gas Emissions</i>			
16	<p>The Applicant shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.</p>	Compliant	<p>Documentation –NPI Reporting for the audit period</p> <p>Site interviews</p>	<p>It was noted during the site interviews that NPI data is reported annually, with calculations completed by a separate arm of Holcim.</p> <p>During the audit interviews it was noted that relevant lighting for the site was recently installed and uses solar power, as opposed to connection to grid electricity.</p>
	<i>SOIL AND WATER – Water Supply</i>			
17	<p>The Applicant shall ensure it has sufficient water for all stages of the development, and if necessary, adjust the scale of quarrying operations to match the available water supply.</p>	Compliant	<p>Site interviews</p> <p>Site visit</p>	<p>During the site interviews it was indicated that the area of the Pit Dam was increased to allow an increase in storage capacity, while the Pit Dam was empty. These works have drought proofed the site, with both dams almost at capacity.</p> <p>Water has not become an issue on-site as water levels have not dropped to levels of concern yet, with observations during the site visit indicating there is sufficient water on-site for on-site operations.</p>

Number	Condition	Compliance	Evidence	Comments
	SOIL AND WATER – Surface water Discharges			
18	The Applicant shall ensure that all surface water discharges from the site comply with the discharge limits in any EPL which regulates water discharges from the site, or with section 120 of the POEO Act.	Non-compliant (Low)	Documentation – Annual Review	<p>During the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), past the LDP and without being captured to allow sediment to settle and water quality testing to be completed prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is likely leaving site in the northern extent of the Project area via a culvert under the Pacific Highway, approximately 250 metres from the LDP.</p> <p>Therefore, a non-compliance has been identified. A low risk has been assigned for the following reasons:</p> <ul style="list-style-type: none"> While this water is not captured, the site visit identified the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland likely allows the velocity of water to reduce and assist in the settlement of suspended sediment. The EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash where it would subsequently be pumped to the Main Dam. Consultation with the EPA during completion of this audit did not indicate concerns in relation to non-compliance with the requirements of Part 5.7 and Section 120 of the POEO Act. The Main Dam has sufficient capacity to allow this water to be captured within the approved water management system (WMS), noting discharged via the LDP has not been required for the Project. <p>Recommendation 04: Ensure the dish drain and sump are constructed in consultation with, and in accordance with the requirements of, the EPA and DPIE.</p> <p>Recommendation 05: Ensure the SWMP is updated as relevant, in consultation with the EPA and DPIE.</p>
	SOIL AND WATER – Soil and Water Management Plan			
19	<p>The Applicant shall prepare and implement a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with the Council and NOW, by suitably qualified and experience person/s whose appointment has been approved by the Secretary, and be submitted to the Secretary for approval by 31 August 2015.</p> <p>In addition to the standard requirements for management plans (see condition 3 of Schedule 5) this plan must include a:</p> <p>(a) Site Water Balance that:</p> <ul style="list-style-type: none"> includes details of: <ul style="list-style-type: none"> sources and security of water supply including contingency planning to ensure demand will be met under all climatic conditions. the site water storage capacity and licensing requirements for all stages of the development, water use and management on site; <p>(b) Surface Water Management Plan that includes:</p> <ul style="list-style-type: none"> a detailed description of the surface water management system for the development, including the: <ul style="list-style-type: none"> clean water diversion system; erosion and sediment controls; and the water storages required for each stage of the development; identification of all reasonable and feasible measures to improve the quality of surface water on the site, particularly those measures required to improve the water quality in the main dam, and a timeframe for the implementation of any identified improvements; the measures that would be implemented to minimise water use on site; surface water impact assessment criteria, a program to monitor surface water quality, and a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the development; and reporting procedures. 	Non-compliant (ANC)	Documentation – Letters of Submission Documentation –Letter from DPIE	<p>2016 IEA considerations:</p> <p>Holcim prepared a SWMP in consultation with NSW Office of Water (NOW) (now DPI Land & Water) and the former Greater Taree City Council (GTCC). Sighted letters to the DPI Lands &Water and former GTCC requesting review and comment on the draft Surface Water Management Plan (SWMP) dated 1 September 2015.</p> <p>Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the SWMP generally meets the requirements of the Project Approval, however minor amendments were requested.</p> <p>2019 IEA considerations:</p> <p>This condition was generally considered during the completion of the 2016 IEA. The controls specified in the SWMP were observed to be implemented and effective, based on site observations and review of relevant monitoring records.</p> <p>Consultation with DPI Lands & Water and MidCoast Council during completion of this audit did not identify any issues with the SWMP.</p> <p>However, based on the findings of Condition 18, updates to the SWMP may be required following completion of construction of the dish drain and sump along the Main Access Road (at the western base of the Main Dam).</p> <p>Review of available documentation indicates that recommendations from the 2016 IEA have not been actioned. Therefore, non-compliance has been found and these recommendations remain relevant (refer below). Relevant findings of non-compliance relate to:</p> <ul style="list-style-type: none"> The SWMP does not include requirements relating to incident reporting associated with exceedances of monitoring criteria. The SWMP does not include requirements, or a plan, in relation to the investigation and reporting of exceedance of performance criteria. <p>Recommendation 06: Update the SWMP to include details of documentation referred to in Table 8 of the SWMP, or include Attachment 4.1H as an Appendix to the SWMP.</p> <p>Recommendation 07: Update the SWMP to include requirements for the investigation and reporting of exceedances of water quality performance criteria in accordance with Condition 6 of Schedule 5 of DA 213-10-99.</p>

Number	Condition	Compliance	Evidence	Comments												
	SOIL AND WATER – On-site Sewage Management															
20	The Applicant shall manage on-site sewage to the satisfaction of Council and the EPA.	Compliant	Interviews Agency consultation	<p>2016 IEA considerations</p> <p>GTCC (now MidCoast Council) advised through correspondence for the audit that the historic On-Site Sewer Management (OSSM) Systems may not be approved by Council. Holcim advised that an application for approval of the OSSM was provided to MidCoast Council but had not yet been approved.</p> <p>Therefore a recommendation to liaise with GTCC to resolve the issue of on-site OSSM systems was made.</p> <p>2019 IEA considerations:</p> <p>Audit interviews indicate that Holcim has been unable to resolve the issues identified in the 2016 IEA, while Holcim indicated an email has been sent to resolve this issue no response has been received from MidCoast Council.</p> <p>Consultation with MidCoast Council during the conduct of the 2019 IEA did not indicate any ongoing concerns related to on-site sewage management.</p> <p>Consultation with the EPA during the conduct of the 2019 IEA did not indicate any concerns related to on-site sewage management.</p>												
	BIODIVERSITY AND REHABILITATION – Biodiversity and Rehabilitation Objectives															
21	<p>The Applicant shall implement a biodiversity offset strategy and rehabilitate the site to the satisfaction of the Secretary, in accordance with the rehabilitation strategy in the documents listed in condition 2 of Schedule 2 and the objectives in Table 8.</p> <p>Table 8: Biodiversity and Rehabilitation Objectives</p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td><i>Site (as a whole)</i></td> <td> <ul style="list-style-type: none"> Safe, stable and non-polluting. Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and has minimal visual impact when viewed from surrounding land. </td> </tr> <tr> <td><i>Land identified in the biodiversity offset strategy and other vegetated land</i></td> <td> <ul style="list-style-type: none"> Conserved and enhanced with native, endemic vegetation. Containing self-sustaining ecosystems. </td> </tr> <tr> <td><i>Surface infrastructure</i></td> <td> <ul style="list-style-type: none"> Decommissioned and removed, unless the Secretary agrees otherwise. </td> </tr> <tr> <td><i>Quarry benches</i></td> <td> <ul style="list-style-type: none"> Landscaped and vegetated using native tree and understorey species, to minimise the visual impact of the quarry. </td> </tr> <tr> <td><i>Quarry pity floor</i></td> <td> <ul style="list-style-type: none"> Landscaped and revegetated using native tree and understorey species. </td> </tr> </tbody> </table>	Feature	Objective	<i>Site (as a whole)</i>	<ul style="list-style-type: none"> Safe, stable and non-polluting. Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and has minimal visual impact when viewed from surrounding land. 	<i>Land identified in the biodiversity offset strategy and other vegetated land</i>	<ul style="list-style-type: none"> Conserved and enhanced with native, endemic vegetation. Containing self-sustaining ecosystems. 	<i>Surface infrastructure</i>	<ul style="list-style-type: none"> Decommissioned and removed, unless the Secretary agrees otherwise. 	<i>Quarry benches</i>	<ul style="list-style-type: none"> Landscaped and vegetated using native tree and understorey species, to minimise the visual impact of the quarry. 	<i>Quarry pity floor</i>	<ul style="list-style-type: none"> Landscaped and revegetated using native tree and understorey species. 	Compliant	Documentation – BRMP, Agency correspondence Site interviews.	<p>During the site visit, rehabilitation of the northern quarry bench (RL50) of the Pit Floor was observed to have been subject to initial rehabilitation in the form of topsoil placement prior to planting with tubestock.</p> <p>Progression of previous rehabilitation observed during the 2016 IEA was noted during completion of the site visit.</p> <p>2016 IEA considerations</p> <p>During the 2016 IEA it was found that correspondence provided by Holcim to the DPIE on 31 March 2016 showed a section 88b Covenant was implemented to satisfy the requirements of this condition, with the implementation of the Biodiversity Offset Strategy commencing immediately from the submission of this correspondence. The section 88B Covenant was noted to have been agreed with DPIE on 31 March 2016. It is noted that:</p> <ul style="list-style-type: none"> Table 4.1 in Section 4.0 of the BRMP identifies the features and objectives identified in Table 8 of the Project Approval. Table 4.1 includes a range of short, medium and long term measures to meet these objectives. Section 3.2 notes that a Biodiversity Offset Area for the Project has not been specifically identified, though Section 3.2.1 identifies a potential biodiversity offset area. OEH advised that “on 31 March 2016 Holcim & OEH discussed the offset strategies and the possibility of retiring appropriate biodiversity credits from a registered BioBanking site. At present OEH supports the latter approach, though if either one of the proposed methods in the condition (Condition 23) be achieved we would support these.”
Feature	Objective															
<i>Site (as a whole)</i>	<ul style="list-style-type: none"> Safe, stable and non-polluting. Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and has minimal visual impact when viewed from surrounding land. 															
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	BIODIVERSITY AND REHABILITATION – Progressive Rehabilitation															
22	<p>The Applicant shall rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilisation measures must be implemented where reasonable and feasible to control dust emissions in disturbed areas that are not active and which are not ready for final rehabilitation.</p> <p><i>Note: It is accepted that parts of the site that are progressively rehabilitated may be subject to disturbance in the future.</i></p>	Compliant	Documentation – Annual Reviews Site observations	<p>The Annual Reviews note progressive rehabilitation of the northern benches (RL 50) was undertaken during the reporting period. Evidence of progressive rehabilitation was sighted during the site visit (17 September 2019).</p> <p>Progression of previous rehabilitation observed during the 2016 IEA was noted during completion of the site visit.</p>												

Number	Condition	Compliance	Evidence	Comments
	<i>BIODIVERSITY AND REHABILITATION – Biodiversity Offset Strategy</i>			
23	<p>By 31 March 2016, the Applicant shall implement a strategy to offset the impacts of clearing 1.28 ha of Small-fruited Grey Gum - Tallowood shrubby open forest on coastal foothills of the southern North Coast vegetation community by either:</p> <p>(a) entering into a Biobanking agreement under the Threatened Species Conservation Act 1995 to retire at least the number of Ecosystem Credits assessed using the Biobanking Credit Calculator; or</p> <p>(b) implementing a strategy to provide a Biodiversity Offset Area of at least 7 ha of Small-fruited Grey Gum - Tallowood shrubby open forest on coastal foothills of the southern North Coast vegetation community;</p> <p>in consultation with OEH and to the satisfaction of the Secretary.</p>	Compliant	Documentation – BRMP, Agency correspondence Site interviews.	<p>During the 2016 IEA, correspondence was sighted provided by Holcim to the DPIE on 31 March 2016 indicating a section 88b Covenant was implemented to satisfy the requirements of this condition, with the implementation of the Biodiversity Offset Strategy commencing immediately from the submission of this correspondence. The section 88B Covenant was noted to have been agreed with DPIE on 31 March 2016 and included protection of at least 7 ha of Small-fruited Grey Gum – Tallowood shrub open forest on coastal foothills of the southern North Coast vegetation community.</p> <p>Correspondence regarding the audit from OEH noted Holcim had consulted with OEH in regard to offset strategies on 31 March 2016. Holcim advised that an Offset Strategy has been pursued; however, there has been no further progress since the 2016 IEA.</p> <p>It is noted that the 1.28 ha of vegetation approved for clearance and requiring the offset has not been subject to clearance. With the exception of not meeting the date specified by this condition, it is considered that this condition has not been triggered. Therefore, a non-compliance has been assigned to this condition.</p> <p>Recommendation 08: Undertake further consultation with OEH and DPIE in relation to commencement of the biodiversity offset strategy, to ensure their approval for delay of implementation of the biodiversity offset strategy until such time as the 1.28 ha of vegetation has been cleared.</p>
	<i>BIODIVERSITY AND REHABILITATION – Long Term Security of Offset</i>			
24	<p>By 30 September 2016, the Applicant shall make suitable arrangements to protect in perpetuity any Biodiversity Offset Area established under condition 23 above to the satisfaction of the Secretary.</p> <p><i>Note: For the purposes of this consent, suitable arrangements may include the use of Public Positive Covenants in combination with Restrictions on Use of Land on the land title/s of the Biodiversity Offset Area. Other arrangements such as the use of Biobanking Agreements or transfer of lands to the national parks for their suitability.</i></p>	Compliant	2019 IEA	<p>Correspondence provided by Holcim to the DPIE on 31 March 2016 indicates a section 88b Covenant was implemented to satisfy the requirements of this condition, with the implementation of the Biodiversity Offset Strategy commencing immediately from the submission of this correspondence. The section 88B Covenant was noted to have been agreed with DPIE on 31 March 2016 and included protection of at least 7 ha of Small-fruited Grey Gum – Tallowood shrub open forest on coastal foothills of the southern North Coast vegetation community.</p>
	<i>BIODIVERSITY AND REHABILITATION – Biodiversity and Rehabilitation Management Plan</i>			

Number	Condition	Compliance	Evidence	Comments
25	<p>The Applicant shall prepare and implement a Biodiversity and Rehabilitation Management Plan for the site to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified person(s) whose appointment has been approved by the Secretary;</p> <p>(b) be prepared in consultation with OEH and Council, and submitted to the Secretary for approval by 31 August 2015;</p> <p>(c) describe the short, medium and long-term measures that would be implemented to:</p> <ul style="list-style-type: none"> manage the native vegetation and fauna habitat on the site; implement the biodiversity offset strategy; and ensure compliance with the biodiversity and rehabilitation objectives in Table 8, and progressive rehabilitation obligations in this consent; <p>(d) include detailed performance and completion criteria for evaluating the performance biodiversity offset strategy and the rehabilitation of the site, including triggers for any necessary remedial action;</p> <p>(e) include a detailed description of the measures that would be implemented to:</p> <ul style="list-style-type: none"> minimise impacts on threatened species, populations and habitats as a result of the quarrying activities on the site; enhance the quality of native vegetation and fauna habitat across the site and in the biodiversity offset area; landscape the site to minimise visual and lighting impacts; minimise the impact of clearing on native fauna; maximise the salvage of environmental resources from any area approved to be cleared including tree hollows, vegetative and soil resources - for beneficial reuse; provide two nest boxes for each tree-hollow destroyed by vegetation clearing; control weeds and feral pests; control erosion; control access, and bushfire management; <p>(f) include a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria;</p> <p>(g) identify the potential risks to rehabilitation of the site and the implementation of the biodiversity offset strategy, and include a description of the contingency measures that would be implemented to mitigate these risks; and</p> <p>(h) include details of who would be responsible for monitoring, reviewing, and implementing the plan.</p>	Compliant	<p>Documentation – Letter from DPIE</p> <p>Documentation – Letter of Approval</p> <p>Documentation – Letter of Submission.</p> <p>Correspondence – OEH</p> <p>Documentation – BRMP</p>	<p>DPIE provided Holcim with an extension for its submission in December 2015 to allow incorporation of Holcim's Biodiversity Direction into the BRMP. The BRMP was finalised and approved in August 2018, with a copy of the BRMP available on the Holcim website.</p> <p>Relevant 2016 IEA considerations</p> <p>Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the BRMP generally meets the requirements of the Project Approval, however minor amendments were requested.</p> <p>The appointment of suitably qualified person(s) was approved by the Secretary. Letter of approval dated 1 July 2015, was sighted.</p> <p>During the 2016 IEA it was found Holcim had not complied with this condition although a Stage 1 of the BRMP was submitted to DPIE in August 2015, the preparation of the plan was not undertaken in consultation with OEH prior to 31 August 2015. Comment from OEH was not requested until December 2015. OEH did not provide comment on the BRMP, but did acknowledge the requirement for consultation had been achieved.</p> <p>As these were considerations of the 2016 IEA, they fall outside the scope of the 2019 IEA.</p>
	<i>BIODIVERSITY AND REHABILITATION – Habitat for Threatened Fauna Species</i>			
26	<p>The Applicant shall ensure that the Biodiversity Offset Area provides suitable habitat for all threatened fauna species that have potential habitat within the 1.28 ha of land proposed to be cleared under EA (Mod 5).</p>	Compliant	<p>Documentation – BRMP</p> <p>Site interviews</p>	<p>Section 3.2.1 of the BRMP identifies a potential Biodiversity Offset Area.</p> <p>Correspondence provided by Holcim to the DPIE on 31 March 2016 indicates a section 88b Covenant was implemented to satisfy the requirements of this condition, with the implementation of the Biodiversity Offset Strategy commencing immediately from the submission of this correspondence. The section 88B Covenant was noted to have been agreed with DPIE on 31 March 2016 and included protection of at least 7 ha of Small-fruited Grey Gum – Tallowood shrub open forest on coastal foothills of the southern North Coast vegetation community.</p> <p>The site visit indicates that the 1.28 ha of vegetation is still subject to clearance and has been surveyed and pegged to ensure no accidental damage occurs.</p>
	<i>BIODIVERSITY AND REHABILITATION – Rehabilitation and Conservation Bond</i>			
27	<p>Within 12 months of the approval of the Biodiversity and Rehabilitation Management Plan, the Applicant shall lodge a Rehabilitation and Conservation Bond with the Department to ensure that the biodiversity offset strategy and the rehabilitation of the site is implemented in accordance with the performance and completion Criteria set out in the Biodiversity and Rehabilitation Management Plan. The sum of the bond shall be determined by:</p> <p>(a) calculating the cost of implementing the biodiversity offset strategy and rehabilitating the site, and</p> <p>(b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary.</p> <p><i>Note: If the rehabilitation of the site and the implementation of the biodiversity offset strategy is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site and the implementation of the biodiversity strategy is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.</i></p>	Non-compliant (ANC)	xx	<p>During the conduct of the audit no documentation or other verification was sighted to indicate that this condition has been met, with payment of the Rehabilitation and Conservation Bond required in August 2019 (i.e. within 12 months of the approval of the BRMP).</p> <p>Therefore, a non-compliance has been found for this condition.</p> <p>Recommendation 09: <i>Ensure a Rehabilitation and Conservation Bond is lodged with DPIE as soon as practicable following submission of the 2019 IEA Report.</i></p>

Number	Condition	Compliance	Evidence	Comments
28	<p>Within 3 months of each independent Environmental Audit (see condition 8 of Schedule 5), the Applicant shall review, and if necessary revise, the sum of the Rehabilitation and Conservation Bond to the satisfaction of the Secretary. This review must consider the:</p> <p>(a) effects of inflation;</p> <p>(b) likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development and implementing the biodiversity offset strategy; and</p> <p>(c) performance of the implementation of the rehabilitation of the site performance to date</p>	Not triggered	N/A	The Rehabilitation and Conservation Bond was due in August 2019, therefore, this constitutes the first audit since lodgement of the Biodiversity and Rehabilitation Management Bond.
ABORIGINAL CULTURAL HERITAGE				
29	<p>The Applicant shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the Project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with Aboriginal stakeholders;</p> <p>(b) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(c) describe the measures that would be implemented to:</p> <ul style="list-style-type: none"> manage known Aboriginal objects and sites; monitor all new surface disturbance on site for unidentified Aboriginal objects; manage the discovery of any human remains or previously unidentified Aboriginal objects on site; and <p>(d) ensure ongoing consultation with Aboriginal stakeholders in the management of any Aboriginal cultural heritage values on site.</p>	Non-compliant (ANC)	<p>Documentation – Letter from DPIE</p> <p>Documentation – ACHMP and Annual Reviews</p> <p>Site interviews</p>	<p>2016 IEA considerations</p> <p>Sighted letter of submission to the Secretary of DPIE dated 31 August 2015.</p> <p>Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the ACHMP generally meets the requirements of the Project Approval.</p> <p>This condition was generally considered during the completion of the 2016 IEA. The controls specified in the ACHMP were observed to be implemented and effective, based on site observations and review of relevant documentation. However, it is noted that comment from the Forster LALC and Purfleet-Taree LALC were not included in the ACHMP.</p> <p>Furthermore, review of the ACHMP indicated that detail of monitoring of all new surface disturbances in Section 7.0 of the ACHMP is only in relation to known archaeological sites and does not mention monitoring for unidentified Aboriginal objects. Therefore, the associated recommendation has been reproduced in this IEA:</p> <p>Recommendation 10: Update the ACHMP to include monitoring of all new surface disturbances on site and include an unexpected finds procedure for unidentified Aboriginal objects and submit to DP&E for approval.</p> <p>2019 IEA comments:</p> <p>Review of the ACHMP indicates no revisions have been made to the ACHMP since the 2016 IEA, with the lack of comment from Forster LALC and Purfleet-Taree LALC not addressed during this time. Documentation was not available to verify if Holcim have tried to close this out.</p> <p>While a non-compliance has not been identified in relation to this, it is recommended Holcim liaise with Forster LALC and Purfleet-Taree LALC to close out the ACHMP.</p> <p>Recommendation 11: Holcim should ensure follow-up correspondence is provided to Forster LALC and Purfleet-Taree LALC to close out Section 4.1 of the ACHMP and for any updates to the ACHMP as a result of this audit. Any comments received should be incorporated into the ACHMP and the revised ACHMP provided to the Secretary of DPIE for review and approval.</p>
TRANSPORT – Operating Conditions				
30	<p>The Applicant shall ensure that:</p> <p>(a) all vehicles entering or leaving the site carrying material that is capable of generating wind-borne dust have their loads covered or suitably contained within the truck; and</p> <p>(b) all laden vehicles leaving the site are cleaned of materials that may fall on the road, before leaving the site</p>	Compliant	<p>Site interviews</p> <p>Site visit observations</p>	<p>During site interviews, it was noted that the requirement to cover loads and ensure materials do not leave site and fall on the road is part of the induction and a requirement for drivers. In addition, there are cameras set up above weighbridge which is on a 72 hr recording loop to make sure loads are centred and tarps are covered. The requirement to ensure tarps are covered also forms part of the Drivers Code of Conduct.</p> <p>Vehicles accessing the site are required to travel through the wheel wash prior to leaving the site. During the site inspection, vehicles were sighted using the wheel wash.</p> <p>During the site inspection, laden vehicles were sighted covering their load prior to leaving the site and accessing the site with covered trays.</p>
TRANSPORT – Pacific Highway Intersection				
31	<p>The Applicant shall maintain the intersection of the Pacific Highway and the Jandra Quarry Access Road, for the duration of product transport from the site, to the satisfaction of the RMS.</p>	Compliant	<p>Site interviews</p> <p>Site visit observations</p> <p>Agency consultation</p>	<p>Vehicles accessing the site are required to travel through the wheel wash prior to leaving the site. During the site inspection, vehicles were sighted using the wheel wash.</p> <p>During the site inspection, laden vehicles were sighted covering their load prior to leaving the site and accessing the site with covered trays.</p> <p>It was noted during site interviews that a street sweeper is hired from nearby (via the RMS centre at Nabiac) to keep the site intersection clean. However, this has not been required in the last 12 months.</p> <p>Consultation with RMS during the audit did not indicate maintenance of this intersection as a concern for RMS.</p>

Number	Condition	Compliance	Evidence	Comments
32	The Applicant shall install and subsequently maintain street lighting at the intersection of the Pacific Highway and the Jandra Quarry Access Road, to the satisfaction of the RMS, prior to transporting quarry products from the site outside of the hours 7 am to 6 pm. Any works affecting the Pacific Highway must not take place without the prior approval of the RMS.	Compliant	Annual Reviews Site interviews Agency consultation	During site interviews it was noted that lighting had been installed ~18 months ago (solar power), with no need for maintenance to be undertaken as yet due to no failure having occurred. Consultation with RMS during the conduct of the audit did not identify any concerns in relation to the site's intersection with the Pacific Highway and associated lighting.
	<i>TRANSPORT – Monitoring of Product Transport</i>			
33	The Applicant shall keep accurate records of: (a) the amount of quarry products, including asphalt, transported from the site (calendar month and Year); (b) the number of laden vehicle movements to and from the site (day, calendar month and year); and (c) publish these records on its website at the end of each calendar quarter.	Non-compliant (ANC)	Site interviews Documentation – Daily Quarry Runsheet Documentation – Annual Review	To track extraction and production Jandra Quarry utilises the SAP database, Holcim's national database for tracking production and stock, maintenance and inventory. Production is tracked on a monthly (as part of business review) and annual basis. Transportation of material is managed through a system called Command that connect to SAP, providing a report at the end of each day detailing the total number of truck movements. The daily quarry runsheet was sighted during the site visit, detailing the locations of where deliveries are being made. The latest date recorded was 16 September 2019. Truck movement data for 2016 and 2017 is available on the Holcim Jandra Quarry website. However, data for 2018 and Quarters 1 & 2 of 2019 are not available in accordance with Condition 33(c). Recommendation 12: Ensure truck movement data is published on the Holcim website at the end of each calendar quarter in accordance with Condition 33(c) of Schedule 3.
	VISUAL IMPACTS			
34	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development; (b) ensure that all external lighting associated with the development complies with Australian Standard A54282 (INT) 1997 - Control of Obtrusive Effects of Outdoor Lighting, or its latest version; and (c) take all practical measures to shield views of quarrying operations from users of public roads and privately-owned residences, to the satisfaction of the Secretary	Non-compliant (ANC)	N/A	During the conduct of the audit there was no documentation available to verify compliance with the Australian Standard, or the satisfaction of the Secretary of DPIE in relation to on-site lighting. However, it is noted that no agencies consulted during the preparation of the 2019 IEA identified lighting and visual impacts as a relevant concern. This is supported by no complaints being received in relation to lighting or visual impacts. Therefore, a finding of non-compliance has been made. Recommendation 13: Ensure relevant details are provided to DPIE related to on-site lighting, including at the site intersection with the Pacific Highway. This should include evidence of the satisfaction of the Secretary of DPIE.
	WASTE			
35	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste generated by the development; (b) ensure that the waste generated by the development is appropriately stored, handled and disposed of; and (c) monitor and report on effectiveness of the waste minimisation and management measures each calendar year, to the satisfaction of the Secretary.	Compliant	Site interviews Site visit Waste collection records	During the site inspection, it was noted that: <ul style="list-style-type: none"> Waste oils are serviced by Australian Waste Oils, General waste is picked up by JR Richards and delivered to Tuncurry Waste Depot. Sediment traps in servicing areas are pumped out by JR Richards. It was noted that this is an infrequent occurrence on an as needs basis and has been undertaken during the audit period. The effectiveness of waste minimisation and management measures are detailed in the Annual Review.
36	Except as expressly permitted in an EPL, the Applicant must not receive waste at the site for storage, treatment, processing, reprocessing or disposal.	Compliant	Site interviews Site visit	During audit interviews, it was indicated that no waste has been received on site. The site visit did not identify anything on-site to contradict this.
	LIQUID STORAGE			
37	The Applicant shall ensure that all liquid storage facilities are protected by appropriate bunding, which must exceed 110% of the stored volume of the liquid.	Compliant	Site visit	During the site visit liquid storage facilities were sighted and located within appropriately bunded areas.
	DANGEROUS GOODS			
38	The Applicant shall ensure that the storage, handling, and transport of dangerous goods is done in Accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.	Compliant	Site visit	During the site visit containers containing dangerous goods were noted to be on-site and appropriately stored.
	BUSHFIRE			
39	The Applicant shall: (a) ensure that the development is suitably equipped to respond to any fires on site; and (b) assist the Rural Fire Service, emergency services and National Parks and Wildlife Service as much as possible if there is a fire in the surrounding area.	Compliant	Site interviews Site visit	During the site interviews, it was noted that the site has a verbal agreement with the fire service for use of water on-site in the event of bushfires if needed. However, no request has been made in relation to assistance from Jandra Quarry. The site visit identified a water cart and sufficient water supply for fires on site.

Number	Condition	Compliance	Evidence	Comments
	SCHEDULE 4 – Additional Procedures			
	NOTIFICATION OF LANDOWNERS			
1	As soon as practicable after obtaining monitoring results showing an exceedance of any relevant criteria in Schedule 3, the Applicant shall notify affected landowners in writing of the exceedance, except where a negotiated agreement has been entered into in relation to that impact, and provide regular monitoring results to each affected landowner until the development is complying with the relevant criteria.	Non-compliant (ANC)	Documentation – Annual Review, Blast Monitoring, Depositional Dust Monitoring Site interviews	Of the monitoring data recorded there was one exceedance of the relevant blasting criteria (see Condition 5 of Schedule 3); however, this exceedance was based on more than 5% of blasts exceeding the criteria detailed in Condition 5 of Schedule 3. Documentation was not available during the audit to verify if a notification was provided to the relevant residence. Recommendation 14: Ensure any exceedance of Project Approval criteria are notified in writing to the affected landowner/s.
	INDEPENDENT REVIEW			
2	If an owner of privately-owned land considers the development to be exceeding the relevant criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.	Not triggered	N/A	Not applicable, no requests received.
3	If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision the Applicant shall: (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: <ul style="list-style-type: none"> consult with the landowner to determine his/her concerns; determine whether the development is complying with the relevant criteria in Schedule 3; and if the development is not complying with these criteria then identify measures that could be implemented to ensure compliance with the relevant criteria; and (b) give the Secretary and landowner a copy of the independent review.	Not triggered	N/A	Not applicable, no requests received.
4	If the independent review determines that the development is complying with the relevant criteria in Schedule 3, then the Applicant may discontinue the independent review with the approval of the Secretary.	Not triggered	N/A	Not applicable, no requests received.
5	If the independent review determines that the development is not complying with the relevant criteria in Schedule 3, then the Applicant shall: (a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent expert, and conduct further monitoring to determine whether these measures ensure compliance; or (b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.	Not triggered	N/A	Not applicable, no requests received.
	SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT CONDITIONS			
	Environmental Management Strategy			
1	The Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval by 31 August 2015; (b) provide the strategic framework for the environmental management of the development; (c) identify the statutory approvals that apply to the development; (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development, (e) describe the procedures that would be implemented to: <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the course of the development; respond to any non-compliance; and respond to emergencies; and (f) include: <ul style="list-style-type: none"> copies of any strategies, plans and programs approved under the conditions of this development consent; and a clear plan depicting all the monitoring required to be carried out under the conditions of this consent 	Compliant	Documentation – Correspondence from DPIE EMS	This condition was generally considered during the completion of the 2016 IEA. The controls specified in the EMS were observed to be implemented and effective, based on site observations and review of relevant documentation. 2016 IEA considerations Correspondence from the DPIE dated 14 March 2016 indicates the Secretary was satisfied the EMS generally meets the requirements of the Project Approval, but requested some revisions. During the 2016 IEA, it was noted that DPIE requested the EMS be resubmitted following completion of the audit. No evidence has been sighted that this has been completed, non-compliance has been noted in relation to this in Condition 4 of Schedule 2.

Number	Condition	Compliance	Evidence	Comments
	Adaptive Management			
2	<p>The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant shall, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur,</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p>	Non-compliant (Low Risk)	Documentation – Annual Review, Blast Monitoring, Depositional Dust Monitoring Site interviews	<p>Review of available documentation indicates that all monitoring is being undertaken on-site generally in accordance with the requirements of this consent. Relevant exceedances of criteria have been discussed against relevant conditions.</p> <p>Review of relevant documentation (i.e. Annual Reviews) indicate all exceedances have been self-reported with relevant actions to address identified and completed, as required.</p> <p>However, a finding of non-compliance (low risk) has been made in relation to a lack of PM10 monitoring until mid-2017 (as discussed in Condition 10 of Schedule 3).</p> <p>No recommendation has been made in relation to this non-compliance as this was reported in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>
	Management Plan Requirements			
3	<p>The Applicant shall ensure that the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <ul style="list-style-type: none"> the relevant statutory requirements (including any relevant approval, licence or lease conditions); any relevant limits or performance measures/criteria; and the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> impacts and environmental performance of the development; and effectiveness of any management measures (see (c) above); <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> incidents; complaints; non-compliances with statutory requirements; and exceedances of the impact assessment criteria and/or performance criteria; and <p>(h) a protocol for periodic review of the plan.</p> <p>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	Non-compliant (ANC)	Documentation – Review of Management Plans	<p>Review of the management plans associated with the operation of the Jandra Quarry (i.e. the BRMP, ACHMP, AQMP, NBMP and SWMP) indicate general compliance with the requirements of this condition; however, review of the SWMP and ACHMP indicate recommendations from the 2016 IEA have not been addressed, with these recommendations relation to:</p> <ul style="list-style-type: none"> ACHMP – While Section 7.0 includes measures in the event of an unexpected Aboriginal cultural heritage item being found, it does not identify measures to be undertaken in the event of unpredicted impact on known Aboriginal cultural heritage items. ACHMP – Does not include reference to protocol for managing incidents, complaints and non-compliances. It is noted Section 9.1 discusses a Continuous Improvement, but does not address measures to be undertaken in the event of unforeseen impacts on known and/or unknown Aboriginal cultural heritage. SWMP – Does not include reference to protocol for managing incidents, complaints, non-compliances and exceedances. It is noted Section 10.1 discusses a Continuous Improvement, but does not address measures to be undertaken in the event of unforeseen impacts. <p>Therefore, a non-compliance has been made in relation to these findings and recommendations from the 2016 IEA still apply (as detailed below).</p> <p>Recommendation 15: Update the SWMP and ACHMP to include a procedure for addressing non-compliances.</p> <p>Refer to Recommendations 10 and 11 against Schedule 3, Condition 29.</p>
	Annual Review			
4	<p>By the end of March each year, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development (including rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against:</p> <ul style="list-style-type: none"> the relevant statutory requirements, limits or performance measures/criteria; the monitoring results of previous years, and the relevant predictions in the documents listed in condition 2 of Schedule 2; <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the development;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the development</p>	Compliant	Documentation – Annual Reviews	<p>Correspondence to DPIE was sighted verifying submission of 2016, 2017 and 2018 Annual Reviews by the end of March each year.</p> <p>Review of the relevant Annual Reviews indicates compliance with the requirements of this condition.</p>

Number	Condition	Compliance	Evidence	Comments
	Revision of Strategies, Plans & Programs			
5	<p>Within 3 months of the submission of an:</p> <p>(a) annual review under condition 4 above;</p> <p>(b) incident report under condition 6 below;</p> <p>(c) audit report under condition 8 below; and</p> <p>(d) any modifications to this consent,</p> <p>the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p><i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i></p>	Non-compliant (ANC)	Management Plans EMS	<p>As discussed in Conditions 19 and 29 of Schedule 3, a number of recommendations from the 2016 IEA have not been addressed, while as discussed in Condition 4 of Schedule 2, the EMS was not revised and resubmitted to DPIE following completion of the 2016 IEA, as requested by DPIE during the conduct of the 2016 IEA.</p> <p>Recommendation 16: <i>Ensure relevant management plans and the EMS are updated and submitted to DPIE for comment, addressing the recommendations of this audit and any subsequent comments made by DPIE as a result of review of the 2019 IEA report.</i></p>
	REPORTING			
	Incident Reporting			
6	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	Compliant	Annual Reviews Interviews	Review of relevant documentation (i.e. Annual Reviews) indicate all exceedances have been self-reported with relevant actions to address identified and completed, as required.
	Regular Reporting			
7	The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.	Compliant	Review website	EPL monitoring data is available via the public website (http://www.holcim.com.au/sustainability/environment/pollution-monitoring-data.html). No discharges from the Main Dam (EPL monitoring point) were undertaken during the audit period.
	INDEPENDENT ENVIRONMENTAL AUDIT			
8	<p>By 31 March 2016, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an independent Environmental Audit of the development. This audit must:</p> <p>(a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under these approvals; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.</p> <p><i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary</i></p>	Non-compliant (ANC)	Documentation – Letter to DPIE	<p>This audit represents the first audit since the 2016 IEA, with the 2016 audit team approved by DPIE on 30 March 2016. It is noted that commissioning for this audit did not occur until late June 2019, which is more than three (3) years since the 2016 audit.</p> <p>Recommendation 17: <i>Ensure the 2022 IEA is commissioned prior to 31 March 2022.</i></p>
9	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Compliant	Correspondence to DPIE	Review of the 2016 IEA indicates the audit was submitted to DPIE on 30 June 2016.

Number	Condition	Compliance	Evidence	Comments
10	<p>By 31 August 2015, the Applicant shall:</p> <p>(a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> the documents listed in condition 2 of Schedule 2; current statutory approvals for the development; approved strategies, plans or programs; a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; a complaints register, which is to be updated on a quarterly basis; the annual reviews (over the last 5 years); any independent environmental audit, and the Applicant's response to the recommendations in any audit; and any other matter required by the Secretary; and <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p>	Non-compliant (ANC)	Review website	<p>Holcim has maintained the following information on its website:</p> <ul style="list-style-type: none"> Documents listed in condition 2 of Schedule 2 including the Environmental Assessment Current statutory approvals for the development (EPL and Development Consent, as modified) Annual review 2015 Truck movement data Monitoring data <p>The following information was not available on its web-site:</p> <ul style="list-style-type: none"> The 2018 Annual Review The most current versions of DPIE approved environmental management plans <p>No complaints have been made to date thus a complaints register is not provided on the website.</p> <p>Recommendation 18: Ensure the most up-to-date versions of DPIE approved management plans and the 2018 Annual Reviews are uploaded to the Holcim website.</p>

Appendix D – EPL

Number	Condition	Compliance	Evidence	Comments															
1	ADMINISTRATIVE CONDITIONS																		
A1	What the licence authorises and regulates																		
A1.1	<p>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Crushing, grinding or separating</td> <td>Crushing, grinding or separating</td> <td>> 100000 - 500000 T processed</td> </tr> <tr> <td>Extractive Activities</td> <td>Land-based extractive activity</td> <td>> 100000 - 500000 T extracted, processed or stored</td> </tr> <tr> <td>Resource recovery</td> <td>Recovery of general waste</td> <td>Any general waste recovered</td> </tr> <tr> <td>Waste storage</td> <td>Waste storage – other types of waste</td> <td>Any other types of waste storage</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Crushing, grinding or separating	Crushing, grinding or separating	> 100000 - 500000 T processed	Extractive Activities	Land-based extractive activity	> 100000 - 500000 T extracted, processed or stored	Resource recovery	Recovery of general waste	Any general waste recovered	Waste storage	Waste storage – other types of waste	Any other types of waste storage	Compliant	Site interviews Site visit	It was verified during site interviews and the site visit that these activities are being undertaken.
Scheduled Activity	Fee Based Activity	Scale																	
Crushing, grinding or separating	Crushing, grinding or separating	> 100000 - 500000 T processed																	
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Resource recovery	Recovery of general waste	Any general waste recovered																	
Waste storage	Waste storage – other types of waste	Any other types of waste storage																	
A1.2	<p>Notwithstanding the fee scales noted above, the licensee must not:</p> <p>(a) extract more than 490,000 tonnes of quarry products from the premises per calendar year; and</p> <p>(b) transport more than 475,000 tonnes of quarry products from the premises per calendar year</p> <p><i>Note: This condition has been added to be consistent with development consent DA231-10-99 MOD 5.</i></p>	Compliant	Documentation – Annual Review	<p>The production volume for the 2016, 2017 and 2018 Reporting Periods were well below 350,000 tonnes.</p> <p>To track extraction and production Jandra Quarry utilises the SAP database, Holcim's national database for tracking production and stock, maintenance and inventory. Production is tracked on a monthly (as part of business review) and annual basis.</p> <p>Transportation of material is managed through a system called Command that connects to SAP, providing a report at the end of each day detailing the total number of truck movements. The daily quarry run-sheet (Google Drive document) was sighted during the site visit, detailing the locations of where deliveries are being made.</p>															
A2	Premises or plant to which this licence applies																		
A2.1	<p>The licence applies to the following premises:</p> <p>Jandra Quarry – Pacific Highway Possum Brush NSW 2430</p> <p>LOT 2 DP 255621, LOT 11 DP 790056, LOT 12 DP 790056, LOT 13 DP 790056, LOT 14 DP 790056, LOT 15 DP 79005</p>	Compliant	SIX Maps	Review of aerial photography with cadastral overlay indicates activities are within the area described.															
A3	Information supplied to the EPA																		
A3.1	<p>Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.</p> <p>In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Compliant	Site interviews Site visit	It was verified during site interviews and the site visit that the works and activities are being carried out in accordance with the Jandra Quarry proposal.															

Number	Condition	Compliance	Evidence	Comments																								
	DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND																											
P1	Location of monitoring/discharge points and areas																											
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1"> <thead> <tr> <th>EPA Identification No</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>Ambient PM10 Monitoring</td> <td></td> <td>Receiver location R1 identified on map titled "Jandra Environmental Monitoring Locations" within the Holcim Environmental Management Strategy - Jandra Quarry. See EPA document DOC16/387391, EF13/3895.</td> </tr> <tr> <td>18</td> <td>Dust deposition monitoring</td> <td></td> <td>Dust monitoring point on the northern site boundary identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Air Quality Management Plan, Jandra Quarry 31/08/2015. 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Holcim have not complied with this condition during the period covered by this audit, as particulate matter monitoring did not commence until May 2017.</p> <p>Furthermore two events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019.</p> <p>As with the 2016 IEA, the risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> There is only one sensitive receiver located within close proximity to the quarry operations. All other PM10 monitoring indicates no exceedance of relevant criteria. Depositional dust monitoring is undertaken and is within the assessment criteria. Review of complaints data indicates no complaints have been received. <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site. Furthermore, this was also reported to the EPA.</p> <p>Consultation with the EPA during the completion of this audit did not identify any concerns in relation to air quality impacts from the site. However, review of the 2018 Annual Review indicates a Penalty Notice and Official caution were issued on 9 August 2018, with the letter stating:</p> <p><i>On 2 July 2018, Holcim (Australia) Pty Ltd submitted an Annual Return (AR) for the reporting period 1 May 2017 to 30 April 2018. Condition M2 requires monitoring of PM10 at Point 11 (Receiver R1) every 6 days. The AR reported a non-compliance with condition M2.2 for failing to monitor PM10 at Point 11 on 14 separate occasions between 1 May 2017 and 9 November 2017. The AR noted the reason for the non-compliance was "missed the 6-day deadline for paper changeout." This represents a failure to do the required monitoring for 23 % of the time, caused by poor internal systems.</i></p> <p><i>In the 2016-2017 AR period Holcim (Australia) Pty Ltd also failed to monitor PM10 as per condition M2 over a 6.5-month period. On 24 May 2018 the EPA issued Holcim (Australia) Pty Ltd an Official Caution for this non-compliance.</i></p> <p>No recommendation has been made in relation to this non-compliance as this was reported in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>
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P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	Note																										

Number	Condition	Compliance	Evidence	Comments															
P1.3	<p>The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point.</p> <table border="1"> <thead> <tr> <th>EPA Identification No</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Discharge quality monitoring</td> <td>Discharge quality monitoring</td> <td>Discharge from final sediment dam as shown in the CSR Readymix Site Photo - Jandra Quarry Water Monitoring Location Figure 1 provided to the EPA 13 May 2002.</td> </tr> </tbody> </table>	EPA Identification No	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Discharge quality monitoring	Discharge quality monitoring	Discharge from final sediment dam as shown in the CSR Readymix Site Photo - Jandra Quarry Water Monitoring Location Figure 1 provided to the EPA 13 May 2002.	Non-compliant (Low Risk)	Site visit Documentation – SWMP	<p>This discharge point was sighted during the site visit, with a photograph taken. Recommendation 17 from the 2016 IEA was observed to have been addressed.</p> <p>During the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), past the LDP and without being captured to allow sediment to settle and water quality testing to be completed prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is likely leaving site in the northern extent of the Project area via a culvert under the Pacific Highway, approximately 250 metres from the LDP.</p> <p>Therefore, a non-compliance has been identified. A low risk has been assigned for the following reasons:</p> <ul style="list-style-type: none"> While this water is not captured, the site visit identified the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland potentially allows the velocity of water to reduce and assist in the settlement of suspended sediment. The EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash where it would subsequently be pumped to the Main Dam. The Main Dam has sufficient capacity to allow this water to be captured within the approved water management system (WMS), noting discharged via the LDP has not been required for the Project. <p>Refer to Recommendations 04 and 05 against Condition 18 of Schedule 3 of the Development Consent.</p>							
EPA Identification No	Type of Monitoring Point	Type of Discharge Point	Location Description																
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P1.4	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <table border="1"> <thead> <tr> <th>EPA Identification No</th> <th>Type of monitoring point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Air blast overpressure & ground vibration peak particle velocity monitoring</td> <td>Receiver location R4 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.</td> </tr> <tr> <td>3</td> <td>Air blast overpressure & ground vibration peak particle velocity monitoring</td> <td>Receiver location R2 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.</td> </tr> <tr> <td>4</td> <td>Meteorological Station – to determine meteorological conditions for noise monitoring</td> <td>Meteorological station adjacent to the "Main Dam" and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Air Quality Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.</td> </tr> <tr> <td>13, 14, 15, 16, 17</td> <td>Noise monitoring</td> <td>Monitoring locations R2, R4, R5, R6, and R7 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.</td> </tr> </tbody> </table>	EPA Identification No	Type of monitoring point	Location Description	2	Air blast overpressure & ground vibration peak particle velocity monitoring	Receiver location R4 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.	3	Air blast overpressure & ground vibration peak particle velocity monitoring	Receiver location R2 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.	4	Meteorological Station – to determine meteorological conditions for noise monitoring	Meteorological station adjacent to the "Main Dam" and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Air Quality Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.	13, 14, 15, 16, 17	Noise monitoring	Monitoring locations R2, R4, R5, R6, and R7 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.	Compliant	Documentation – Monitoring Data. Site interviews.	Review of relevant documentation indicates monitoring is being undertaken at relevant locations.
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2	Air blast overpressure & ground vibration peak particle velocity monitoring	Receiver location R4 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.																	
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Number	Condition	Compliance	Evidence	Comments																		
3	LIMIT CONDITIONS																					
L1	Pollution of waters																					
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	Compliant	Site visit Site interviews Documentation – Annual Review	<p>No offsite discharge undertaken for the reporting period. However, during the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), past the LDP without being captured to settling and completion of water quality testing prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is potentially leaving site in the northern-most extent of the Project area; via a culvert under the Pacific Highway, approximately 250 metres from the LDP.</p> <p>As discussed in Conditions P1.2, while this water is not captured, the site visit identified the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland potentially allows the velocity of water to reduce and assist in the settlement of suspended sediment.</p> <p>Without the availability of background data for receiving waters off-site and water quality data for the water observed flowing past the LDP, the auditor is unable to conclusively determine if this would represent potential for material harm to the environment in consideration of Part 5.7 of the POEO Act.</p> <p>However, as discussed in Conditions P1.2, the EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash where it would subsequently be pumped to the Main Dam.</p> <p>Consultation with the EPA during completion of this audit did not indicate potential non-compliance with the requirements of Section 120 of the POEO Act as a relevant concern.</p>																		
L2	Concentration Limits																					
L2.1	For each monitoring/discharge point or utilisation area specified in the table's below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Noted	NA	NA																		
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Noted	NA	NA																		
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table's.	Noted	NA	NA																		
L2.4	Water and/or Land Concentration Limit Point 1 <table border="1" data-bbox="329 1230 1427 1430"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>50 percentile concentration limit</th> <th>90 percentile concentration limit</th> <th>3DGM concentration limit</th> <th>100 percentile concentration limit</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>pH</td> <td></td> <td></td> <td></td> <td>6.5 – 8.5</td> </tr> <tr> <td>Total Suspended Solids</td> <td>Milligrams per litre</td> <td></td> <td></td> <td></td> <td>50</td> </tr> </tbody> </table>	Pollutant	Units of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	pH	pH				6.5 – 8.5	Total Suspended Solids	Milligrams per litre				50	Compliant	Documentation – Annual Review	Review of monitoring results in the 2016, 2017 and 2018 Annual Reviews indicated discharge water quality did not exceed the 100 percentile concentration limit.
Pollutant	Units of measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																	
pH	pH				6.5 – 8.5																	
Total Suspended Solids	Milligrams per litre				50																	

Number	Condition	Compliance	Evidence	Comments																				
L3.1	Waste																							
L3.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled "Waste" and meeting the definition, if any, in the column titled "Description" in the table below. Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled "Activity" in the table below. Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled "Other Limits" in the table below. This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>General or Specific exempted waste</td> <td>Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2014</td> <td>Waste storage</td> <td></td> </tr> <tr> <td>NA</td> <td>General solid waste (non-putrescible)</td> <td>Concrete "wash-out" waste from concrete batch plants only</td> <td>Waste processing (non-thermal treatment) Waste storage</td> <td>Must not process more than 3,000 tonnes per annum or store greater than 1,000 tonnes on site at any one time</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other limits	NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2014	Waste storage		NA	General solid waste (non-putrescible)	Concrete "wash-out" waste from concrete batch plants only	Waste processing (non-thermal treatment) Waste storage	Must not process more than 3,000 tonnes per annum or store greater than 1,000 tonnes on site at any one time	Compliant	Documentation – Annual Reviews Site visit	Review of relevant documentation indicates monitoring is being undertaken at relevant locations.					
Code	Waste	Description	Activity	Other limits																				
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NA	General solid waste (non-putrescible)	Concrete "wash-out" waste from concrete batch plants only	Waste processing (non-thermal treatment) Waste storage	Must not process more than 3,000 tonnes per annum or store greater than 1,000 tonnes on site at any one time																				
L4	Noise limits																							
L4.1	Noise generated at the premises must not exceed the noise limits in the tables below. The locations referred to in the tables below are indicated in the document titled: "Jandra Quarry Intensification of Production Environmental Assessment (DA 231-10-99 MOD 5)" Dated July 2014	Note	NA	NA																				
L4.2	<p>Noise from the premises during quarrying operations only must not exceed the limits specified in the following table:</p> <table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Limit dB(A) LAeq(15 min) Shoulder, Day & Evening</th> </tr> </thead> <tbody> <tr> <td>15</td> <td>40</td> </tr> <tr> <td>13, 14, 16</td> <td>36</td> </tr> <tr> <td>17</td> <td>35</td> </tr> </tbody> </table>	EPA identification no.	Limit dB(A) LAeq(15 min) Shoulder, Day & Evening	15	40	13, 14, 16	36	17	35	Compliant	Quarterly Monitoring Records Site interviews	Review of available documentation indicates that monitoring is being undertaken on-site and shows compliance with the requirements of this condition.												
EPA identification no.	Limit dB(A) LAeq(15 min) Shoulder, Day & Evening																							
15	40																							
13, 14, 16	36																							
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L4.3	<p>Noise from the premises during operations including asphalt plant must not exceed the limits specified in the following table:</p> <table border="1"> <thead> <tr> <th>EPA identification no.</th> <th>Limit dB(A) LAeq(15 min) Shoulder, Day & Evening</th> <th>Limit dB(A) LAeq(15 minute) Night</th> <th>Limit dB(A) LA1(1 minute) Nigh</th> </tr> </thead> <tbody> <tr> <td>15</td> <td>41</td> <td>39</td> <td>51</td> </tr> <tr> <td>14</td> <td>40</td> <td>39</td> <td>51</td> </tr> <tr> <td>13, 16</td> <td>40</td> <td>35</td> <td>48</td> </tr> <tr> <td>17</td> <td>36</td> <td>35</td> <td>48</td> </tr> </tbody> </table>	EPA identification no.	Limit dB(A) LAeq(15 min) Shoulder, Day & Evening	Limit dB(A) LAeq(15 minute) Night	Limit dB(A) LA1(1 minute) Nigh	15	41	39	51	14	40	39	51	13, 16	40	35	48	17	36	35	48	Not Triggered	N/A	N/A – Asphalt plant has not been operational during the audit period.
EPA identification no.	Limit dB(A) LAeq(15 min) Shoulder, Day & Evening	Limit dB(A) LAeq(15 minute) Night	Limit dB(A) LA1(1 minute) Nigh																					
15	41	39	51																					
14	40	39	51																					
13, 16	40	35	48																					
17	36	35	48																					
L4.4	<p>For the purpose of the conditions above:</p> <ul style="list-style-type: none"> Shoulder, Day and Evening is defined as the period from 6am - 10pm Night is defined as the period from 10pm - 6am 	Note	NA	NA																				
L4.5	The noise limits set out in the above tables apply under all meteorological conditions except the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions.	Note	NA	NA																				

Number	Condition	Compliance	Evidence	Comments
L4.6	For the purpose of the conditions above: a) Data recorded by the meteorological station identified in this licence must be used to determine meteorological conditions; and b) Temperature inversion conditions (stability category) when determined by the sigma-theta method must be determined in accordance with Part E3 of the NSW Industrial Noise Policy. Temperature inversion conditions (determined by vertical temperature gradient in degrees C) are to be determined by direct measurement over a minimum 50m height interval as referred to in Part E2 to the NSW Industrial Noise Policy	Non-compliant (Low Risk)	Documentation – NBMP, Quarterly Monitoring Records Site interviews	Review of quarterly noise monitoring indicates that 'prevailing meteorological conditions for the monitoring period were sourced from Taree airport's meteorological station'. With the installation of the meteorological station on-site, use of the Taree airport's meteorological station should be reconsidered in consultation with DPIE and the EPA. The risk level associated with this non-compliance is considered low for the following reasons: <ul style="list-style-type: none"> There is one sensitive receiver located within close proximity to the quarry operations and the receiver has signed a noise agreement relating to the quarry operations. Holcim advised that there have been no noise complaints associated with the operations. Holcim has received no noise complaints to date. Recommendation 02: Ensure meteorological conditions used in noise monitoring are determined based on data recorded by the on-site meteorological station.
L4.7	To determine compliance: a) with Leq (15 minute) noise limits in this licence, the noise measurement equipment must be located: <ul style="list-style-type: none"> approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or within 30 metres of a dwelling façade, but not close than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or where applicable within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) With the LA1 (1 minute) noise limits in this licence, the noise measurement equipment must be located within 1 metre of a dwelling façade. c) with the noise limits in this licence, the noise measurement equipment must be located: <ul style="list-style-type: none"> at the most affected point at a location where there is no dwelling at the location; or at the most affected point within an area at a location prescribed by this licence. 	Compliant	Documentation – NBMP	Review of available documentation indicates compliance with the requirements of this condition.
L4.8	A non-compliance of the noise limit conditions will still occur where noise generated from the premises in excess of the appropriate limit is measured: <ul style="list-style-type: none"> at a location other than an area prescribed by this licence; and/or at a point other than the most affected point at a location 	Note		
L5	Blasting			
L5.1	Blasting in or on the premises must only be carried out between 9am and 5pm, Monday to Friday and 9am and 3pm, Saturday. Blasting in or on the premises must not take place on Sundays or Public Holidays without the prior approval of the EPA.	Compliant	Documentation – Monitoring Data	Review of available documentation and site interviews indicate compliance with the requirements of this condition.
L5.2	The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.	Non-compliant (Low Risk)	Documentation – Monitoring Data	Review of monitoring data for the 2016 Annual Review indicates nine (9) blasts were undertaken during the reporting period, with the blast overpressure on 22/03/2016 exceeding 115 dB. This constitutes approximately 11% of blasts during the 2016 reporting period and is therefore a non-compliance with this condition. This non-compliance was reported in the 2016 Annual Review. A finding of non-compliance (low risk) has been assigned based on the following considerations: <ul style="list-style-type: none"> As only nine (9) blast were completed during the 12 month period, any blast that exceeded the criteria automatically resulted in an exceedance in 5% of total number of blasts. Review of the subsequent blasts indicates that no further exceedances of the 115 dB(Lin Peak) occurred during the reporting period after the event on 22/03/2016. Furthermore, review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred. No exceedance of the 120 dB(Lin Peak) airblast overpressure criteria has occurred. No complaints have been received in relation to blasting during the reporting period from private or public stakeholders to indicate disturbance or damage to persons or property. As review of monitoring for the 2017 and 2018 Annual Reviews indicate no further exceedances have occurred, no recommendation has been made in relation to this non-compliance, as it is not an ongoing issue.
L5.3	The airblast overpressure level from blasting operations in or on the premises must not exceed: 120 dB (Lin Peak) at any time; at either monitoring point 2 or 3 of this licence.	Compliant	Documentation – Monitoring Data	No exceedance of the 120 dB(Lin Peak) airblast overpressure criteria has occurred

Number	Condition	Compliance	Evidence	Comments
L5.4	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 5 mm/second for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.	Compliant	Documentation – Monitoring Data	Blast monitoring results were reported in the 2016, 2017 and 2018 Annual Review and are publically available on the Holcim website (http://www.holcim.com.au/sustainability/environment/pollution-monitoring-data.html). No exceedances were recorded during the audit period.
L5.5	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 10 mm/second at any time; at either monitoring point 2 or 3 of this licence.	Compliant	Documentation – Monitoring Data	Blast monitoring results were reported in the 2016, 2017 and 2018 Annual Review and are publically available on the Holcim website (http://www.holcim.com.au/sustainability/environment/pollution-monitoring-data.html). No exceedances were recorded during the audit period.
L5.6	Error margins associated with any monitoring equipment used to measure blasts must not be taken into account when determining whether or not the limit has been exceeded.	Note		
L5.6	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances: 1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or 2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.	Compliant	Site interviews Documentation – Annual Reviews, Complaints Records	Review of available documentation and site interviews indicates no offensive blast fume has occurred as a result of operation of the Project.
L6	Hours of operation			
L6.1	In accordance with development consent DA 231-10-99 MOD 5, hours of operation for the premises are specified in the table.	Compliant	Site interviews Documentation – Annual Reviews, Complaints Records	Review of available documentation and site interviews indicates no offensive blast fume has occurred as a result of operation of the Project.
L6.2	In accordance with development consent DA 231-10-99 MOD 5, the following activities may be conducted at the premises outside the hours specified in the table (a) return of trucks to the premises prior to midnight Monday to Saturday; (b) delivery or dispatch of materials as requested by Police, Fire Brigade or other similar authorities; (c) emergency work to avoid the loss of lives, property and/or prevent environmental harm; and (d) maintenance activities provided it is inaudible at residential premises. In circumstances outlines in (b) and (c), the Licensee shall notify affected residents prior to undertaking the activities, or as soon as practical thereafter	Note		
4	OPERATING CONDITIONS			
O1	Activities must be carried out in a competent manner			
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Compliant	Site interviews	During the site inspection, it was noted that: <ul style="list-style-type: none"> Waste oils are serviced by Australian Waste Oils, General waste is picked up by JR Richards and delivered to Tuncurry Waste Depot. Sediment traps in servicing areas are pumped out by JR Richards. It was noted that this is an infrequent occurrence on an as needs basis and has been undertaken during the audit period. During the site visit liquid storage facilities were sighted and located within appropriately banded areas. During the site visit containers containing dangerous goods were noted to be on-site and appropriately stored.

Number	Condition	Compliance	Evidence	Comments
O2	Maintenance of plant and equipment			
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and b) must be operated in a proper and efficient manner.	Compliant	Maintenance Plan. Plant maintenance record sample. Site interviews. Pre-start checklists Documentation – Annual Return	During the site interviews, it was stated that daily, weekly and monthly inspections of plant and equipment are undertaken with checklists for each. A maintenance plan was sighted in the main office detailing “who, what, when and where”, which is a site based document (Google Drive document). From the monthly inspections, tasks are allocated and necessary parts ordered. The maintenance day form is signed off by the Quarry Manager and the Site Supervisor and goes into a spreadsheet to track history. These documents track each piece of equipment on site separately, including separation into mobile and static equipment. A plant maintenance record was sighted during the site visit. It was noted during site interviews that hours for equipment are tracked on a daily basis (pre-start checklist) and this is tracked on weekly basis for annual servicing requirements, which are completed on-site by a qualified diesel mechanic in a hard-stand area. Further, it was noted that in an effort to minimise the risk of hydraulic hose failures, a maintenance program for hydraulic hoses has been implemented, with inspections completed on a daily basis as part of pre-start checklists. During the site visit, copy of pre-start checklists for machines were sighted which detailed the start date, operating hours, and machine details and also included a checklist to be completed by the operator. In regard to training, it was noted that initial inductions include a level 1 environmental induction. Environmental awareness/training was also noted to be undertaken during toolbox talks, spill kit response training sessions. The Quarry Manager noted the PIRMP is tested each year. The PIRMP was completed 20 February 2019, as verified via review of the 2018 Annual Return.
O3	Dust			
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliant	Site visit Documentation – AQMP	Measures including use of a water cart, sprinklers on top of aggregate and hoses on the plant are noted; however, during the site visit, weather did not require use of these measures. Refer to Condition 12 of Schedule 3 of the Conditions of Approval provided in Appendix A.
O4	Processes and management			
O4.1	The licensee must take all reasonable measures to prevent the tracking of mud and debris onto the Pacific Highway including, but not limited to, ensuring all vehicles leaving the premises pass through the vehicular wheel wash.	Compliant	Documentation – SWMP Site visit Site interviews.	Section 5.1.5 of the SWMP notes that a weighbridge and wheel wash system is located on the main access road, with the wheel wash system activated by a sensor and cycling for 15 seconds each time a truck travels over the weighbridge; thereby ensuring all truck wheels are cleaned and free of sediment and dust before leaving the site. Sighted wheel wash system during site visit and it was noted during site interviews that a street sweeper from Nabiac is used on the quarry intersection. No complaints or correspondence have been received from public or private stakeholders during the audit period.
O5	Waste management			
O5.1	The licensee must comply with the conditions as specified in this licence or where no specific conditions outlined in this licence, this licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2014	Note		
O6	Other operating conditions			
O6.1	the proponent must not cause or permit the emission of offensive odour beyond the boundary of the premises	Compliant	Documentation- AQMP and 2016-2018 Annual Reviews	The 2017, 2017 and 2018 Annual Reviews did not identify any odour related issues or complaints for the reporting period. Section 7.0 of the Air Quality Management Plan (AQMP) includes monitoring and mitigation measures in regard to odour. No complaints have been received in relation to odour from site.
5	MONITORING AND RECORDING CONDITIONS			
M1	Monitoring records			
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	Noted		
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Compliant	Site visit Site interviews Documentation – Blasting and Dust Deposition Monitoring	During the site interviews, it was noted that ALS complete all monitoring and data analysis for the site, with a sample monitoring record sighted during the site visit on 17 September 2019. Water quality monitoring records were sighted and were legible.

Number	Condition	Compliance	Evidence	Comments																
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Compliant	Site visit Site interviews Documentation – Blasting and Dust Deposition Monitoring	During the site interviews, it was noted that ALS complete all monitoring and data analysis for the site, with a sample monitoring record sighted during the site visit on 17 September 2019. Water quality monitoring records were sighted and were legible.																
M2	Requirement to monitor concentration of pollutants discharged																			
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Note																		
M2.2	<table border="1"> <thead> <tr> <th>Point</th> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>11</td> <td>PM10</td> <td>Micrograms per cubic metre</td> <td>Every 6 days</td> <td>AM-18</td> </tr> <tr> <td>18,19,20,21</td> <td>Particulates-Deposited Matter</td> <td>Grams per square metre per month</td> <td>Monthly</td> <td>Am-19</td> </tr> </tbody> </table>	Point	Pollutant	Units of measure	Frequency	Sampling Method	11	PM10	Micrograms per cubic metre	Every 6 days	AM-18	18,19,20,21	Particulates-Deposited Matter	Grams per square metre per month	Monthly	Am-19	Non-Compliant (Low Risk)		<p>The 2016 IEA found a non-compliance due to particulate matter monitoring not being undertaken in accordance with the requirements of this condition. Holcim have not complied with this condition during the period covered by this audit, as particulate matter monitoring did not commence until May 2017.</p> <p>Furthermore two events of non-compliance occurred during the audit period, with the PM10 unit not taking measurements on 16 and 22 September 2019.</p> <p>As with the 2016 IEA, the risk level associated with this non-compliance is considered low for the following reasons:</p> <ul style="list-style-type: none"> • There is only one sensitive receiver located within close proximity to the quarry operations. • All other PM10 monitoring indicates no exceedance of relevant criteria. • Depositional dust monitoring is undertaken and is within the assessment criteria. • Review of complaints data indicates no complaints have been received. <p>No recommendation has been made in relation to this non-compliance as Holcim reported this non-compliance to DPIE in the 2017 Annual Review, which was the subject of a 'Show Cause' Notice, and particulate matter monitoring is now being undertaken on-site. Furthermore, this was also reported to the EPA.</p> <p>Consultation with the EPA during the completion of this audit did not identify any concerns in relation to air quality impacts from the site. However, review of the 2018 Annual Review indicates a Penalty Notice and Official caution were issued on 9 August 2018, with the letter stating:</p> <p><i>On 2 July 2018, Holcim (Australia) Pty Ltd submitted an Annual Return (AR) for the reporting period 1 May 2017 to 30 April 2018. Condition M2 requires monitoring of PM10 at Point 11 (Receiver R1) every 6 days. The AR reported a non-compliance with condition M2.2 for failing to monitor PM10 at Point 11 on 14 separate occasions between 1 May 2017 and 9 November 2017. The AR noted the reason for the non-compliance was "missed the 6-day deadline for paper changeout." This represents a failure to do the required monitoring for 23 % of the time, caused by poor internal systems.</i></p> <p><i>In the 2016-2017 AR period Holcim (Australia) Pty Ltd also failed to monitor PM10 as per condition M2 over a 6.5-month period. On 24 May 2018 the EPA issued Holcim (Australia) Pty Ltd an Official Caution for this non-compliance.</i></p> <p>No recommendation has been made in relation to this non-compliance as this was report in the 2018 Annual Review and subject to an existing Penalty Notice and Official caution with the EPA, with actions implemented to address these issues in consultation with the EPA and DPIE.</p>	
Point	Pollutant	Units of measure	Frequency	Sampling Method																
11	PM10	Micrograms per cubic metre	Every 6 days	AM-18																
18,19,20,21	Particulates-Deposited Matter	Grams per square metre per month	Monthly	Am-19																
M2.3	Water and/ or Land Monitoring Requirements Point 1 <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>pH</td> <td>pH</td> <td>Each overflow event</td> <td>Grab sample</td> </tr> <tr> <td>Total suspended solids</td> <td>Milligrams per litre</td> <td>2 times daily during discharge</td> <td>Grab sample</td> </tr> <tr> <td>Turbidity</td> <td>Nephelometric turbidity units</td> <td>2 times daily during discharge</td> <td>Grab sample</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	pH	pH	Each overflow event	Grab sample	Total suspended solids	Milligrams per litre	2 times daily during discharge	Grab sample	Turbidity	Nephelometric turbidity units	2 times daily during discharge	Grab sample	Not triggered	Annual Reviews for 2016, 2017 and 2018 Agency consultation	<p>Review of the 2018 Annual Review indicates a Penalty Notice and Official Caution were issued for the site on 9 August 2018, with the EPA indicating:</p> <p><i>The EPA has reasonable grounds to believe that Holcim committed an offence under section 64 of the POEO Act, by failing to monitor TSS and turbidity at the frequency required by Condition M2.3 of Environment Protection Licence 2796 on 21 April 2017 at the Holcim Jandra Quarry ("the alleged offence"). Further, the EPA believes that there is sufficient evidence to prove the alleged offence.</i></p> <p>Agency consultation with the EPA during the completion of the 2019 IEA did not provide context to these comments, with review of available documentation and site interviews indicating no discharge was undertaken during the audit period. Without further context, a finding of not triggered has been made.</p>
Pollutant	Units of measure	Frequency	Sampling Method																	
pH	pH	Each overflow event	Grab sample																	
Total suspended solids	Milligrams per litre	2 times daily during discharge	Grab sample																	
Turbidity	Nephelometric turbidity units	2 times daily during discharge	Grab sample																	

Number	Condition	Compliance	Evidence	Comments
M3	Testing methods – concentration limits			
M3.1	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing taking place.	Compliant	EMS AQMP NBMP SWMP Agency consultation	Review of available documentation, including EPL Monitoring Records available on the Holcim website (https://www.holcim.com.au/sustainability/environment/pollution-monitoring-data) verifies compliance with the requirements of this condition. Furthermore, consultation with the EPA during the completion of the 2019 IEA did not indicate any issues with EPL related monitoring (or otherwise) being completed for the site.
M3.2	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Not triggered	Documentation – SWMP	Refer to response to Condition M2.3.
M3.3	The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	Compliant	Agency consultation Annual Reviews AQMP	Review of available documentation, including EPL Monitoring Records available on the Holcim website (https://www.holcim.com.au/sustainability/environment/pollution-monitoring-data) verifies compliance with the requirements of this condition. Furthermore, consultation with the EPA during the completion of the 2019 IEA did not indicate any issues with EPL related monitoring (or otherwise) being completed for the site.
M4	Weather monitoring			
M4.1	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively	Compliant	Site visit Documentation – Rainfall register	Rain gauge sighted during the site inspection. However, Jandra now have a meteorological station which provides them with data on a 24 hour basis, with a sample sighted.
M4.1	Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.	Compliant	Site visit Documentation – Rainfall register	Rain gauge sighted during the site inspection. However, Jandra now have a meteorological station which provides them with data on a 24 hour basis, with a sample sighted.
M5	Recording of pollution complaints			
M5.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Not Triggered	N/A	Not applicable, no complaints were received during the audit period.
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Not Triggered	N/A	Not applicable, no complaints were received during the audit period.
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Not Triggered	N/A	Not applicable, no complaints were received within the last 4 years.
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted	N/A	
M6	Telephone complaints line			
M6.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	Compliant	Documentation – EMS	Section 7.3.2 of the EMS notes: "All community inquiries and complaints related to the Quarry's activities will be referred to the Jandra Quarry Manager (0429 790 627). A postal address (Level 8, 799 Pacific HWY, Chatswood, NSW) and on the Holcim website (www.holcim.com.au) that provides for receipt of complaints and enquiries."
M6.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	Compliant	Documentation – Holcim website	Environmental or community enquiries line details sighted on Jandra/Holcim website.
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence	Not Triggered	N/A	Not applicable.
M7	Blasting			
M7.1	To determine compliance with the blasting limits of this licence: a) Airblast overpressure and ground vibration levels must be measured and electronically recorded for monitoring points 2 and 3 for the parameters specified in Column 1 of the table below; and b) The licensee must use the units of measure, sampling method, and sample at the frequency specified opposite in the other columns.	Compliant		Review of available documentation indicates that all monitoring is being undertaken on-site generally in accordance with the requirements of this condition.

Number	Condition	Compliance	Evidence	Comments
<i>M8</i>	Noise monitoring			
<i>M8.1</i>	To assess compliance with the noise limits of this licence, attend noise monitoring must be undertaken in accordance with the conditions of this licence and: a) at EPA identification no. locations 13, 14, 15, 16 and 17 as listed on this licence; b) occur quarterly in a reporting period, during the times of the year when noise propagation from the premises is likely to be at its worst; and c) occur during the night period as defined in the NSW Industrial Noise Policy, and in conjunction with an asphalt campaign if any such campaign occurs within the quarterly monitoring period	Observation	Documentation – Quarterly Noise Monitoring, Annual Reviews Site interviews Agency consultation	Review of available documentation indicates that monitoring is being undertaken on-site generally in accordance with the requirements of this condition. During the site interviews it was noted that noise monitoring has not been undertaken during the night period, as no such operations have been undertaken during the audit period. Agency consultation with the EPA during the conduct of this audit did not identify any issue with current monitoring for the site. No asphalt campaigns have been completed on site during the audit period. Recommendation 19: Ensure documentary evidence is obtained to confirm the EPA is satisfied with monitoring during the night period not being undertaken until such time as it is relevant to operations on-site.
<i>M8.2</i>	Noise monitoring must be carried out in accordance with Australian Standard AS 2659.1 - 1998: Guide to the use of sound measuring equipment - Portable sound level metres, and the compliance monitoring guidance provided in the NSW Industrial Noise Policy.	Compliant		Review of available documentation indicates that monitoring is being undertaken on-site generally in accordance with the requirements of this condition.
6	REPORTING CONDITIONS			
<i>R1</i>	Annual return documents			
<i>R1.1</i>	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: a) a Statement of Compliance; and b) a Monitoring and Complaints Summary. At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.	Compliant	Documentation – Annual Return Site interviews	An Annual Return for 2018 was sighted; however, Annual Returns for 2016 and 2017 have not been sighted for the audit. However, Review of the Public Register indicates submission by the due date for all Annual Returns during the audit period.
<i>R1.2</i>	An Annual Return must be prepared in respect of each reporting period, except as provided below. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	Compliant	Documentation – Annual Return Site interviews	An Annual Return for 2018 was sighted; however, Annual Returns for 2016 and 2017 have not been sighted for the audit. However, Review of the Public Register indicates submission by the due date for all Annual Returns during the audit period.
<i>R1.3</i>	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	Not Triggered	N/A	Not applicable.
<i>R1.4</i>	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	Not Triggered	N/A	Not applicable.
<i>R1.5</i>	The Annual Return for the reporting period must be supplied to the EPA by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Compliant	Documentation – Annual Return Site interviews	An Annual Return for 2018 was sighted; however, Annual Returns for 2016 and 2017 have not been sighted for the audit. However, Review of the Public Register indicates submission by the due date for all Annual Returns during the audit period.
<i>R1.6</i>	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	Non-compliant (ANC)	Documentation – Annual Return Site interviews	An Annual Return for 2018 was sighted and identified as having been submitted by the due date; however, Annual Returns for 2016 and 2017 have not been sighted for the audit and were unavailable for review. Therefore, a finding of non-compliance has been made. Recommendation 20: Ensure Annual Returns are retained for a period of at least four years after submission to the EPA.
<i>R1.7</i>	Within the Annual Return, the Statement of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant	Documentation – Annual Return Site interviews	An Annual Return for 2018 was sighted; however, Annual Returns for 2016 and 2017 have not been sighted for the audit. However, Review of the Public Register indicates submission by the due date for all Annual Returns during the audit period.

Number	Condition	Compliance	Evidence	Comments
R2	<p>Notification of environmental harm</p> <p>Note: The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act.</p>	Observation	Site visit Agency consultation Site interviews	<p>During the site visit, adverse rain conditions resulted in the generation of surface water runoff on-site. Dirty water was observed to be draining along the Site Access Road (along the western base of the Main Dam), past the LDP without being captured to allow settling and completion of water quality testing prior to re-use or discharge via the LDP. Based on review of mapped watercourses, this water is potentially leaving site in the northern-most extent of the Project area; via a culvert under the Pacific Highway, approximately 250 metres from the LDP.</p> <p>As discussed in Conditions P1.2 and L1.1, while this water is not captured, the site visit identified the vast majority of on-site water is being captured within the approved storage areas. Furthermore, the distance of approximately 250 metres through dense bushland potentially allows the velocity of water to reduce and assist in the settlement of suspended sediment.</p> <p>Without the availability of background data for receiving waters off-site and water quality data for the water observed flowing past the LDP, the auditor is unable to conclusively determine if this would represent potential for material harm to the environment in consideration of Part 5.7 of the POEO Act.</p> <p>However, as discussed in Conditions P1.2 and L1.1, the EPA is aware of the issue and have requested Holcim construct a dish drain and sump to transfer this water to the wheel wash where it would subsequently be pumped to the Main Dam.</p> <p>Consultation with the EPA during completion of this audit did not indicate concerns in relation to potential non-compliance with the requirements of Part 5.7 of the POEO Act.</p>
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Observation	Site visit	Refer to Condition R2.
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.	Observation	Agency consultation	Refer to Condition R2.
R3	Written report			
R3.1	<p>Where an authorised officer of the EPA suspects on reasonable grounds that:</p> <p>a) where this licence applies to premises, an event has occurred at the premises; or</p> <p>b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.</p>	Not Triggered	Site interviews Agency consultation	Not applicable, no request for a written report received. Consultation with the EPA during the completion of this audit did not identify any relevant concerns.
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.	Not Triggered	Site interviews Agency consultation	Not applicable, no request for a written report received. Consultation with the EPA during the completion of this audit did not identify any relevant concerns.
R3.3	<p>The request may require a report which includes any or all of the following information:</p> <p>a) the cause, time and duration of the event;</p> <p>b) the type, volume and concentration of every pollutant discharged as a result of the event;</p> <p>c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;</p> <p>d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;</p> <p>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</p> <p>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</p> <p>g) any other relevant matters.</p>	Not Triggered	Site interviews Agency consultation	Not applicable, no request for a written report received. Consultation with the EPA during the completion of this audit did not identify any relevant concerns.
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.	Not Triggered	Site interviews Agency consultation	Not applicable, not request for a written report received. Consultation with the EPA during the completion of this audit did not identify any relevant concerns.

Number	Condition	Compliance	Evidence	Comments			
R4	Other operating conditions						
R4.1	Noise Compliance Assessment Report A noise compliance assessment report must be submitted to the EPA with each Annual Return. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) an assessment of compliance with noise limits detailed in the limit conditions of this licence; and b) an outline of any management actions taken within the monitoring period to address any exceedences of the limits detailed in the limit conditions of this licence.	Non-compliant (ANC)	2018 Annual Return	An Annual Return for 2018 was sighted; however, Annual Returns for 2016 and 2017 have not been sighted for the audit. Review of the 2018 Annual Return indicated a Noise Compliance Assessment Report and Blast Monitoring Report were not submitted with the 2018 Annual Return. Therefore, a non-compliance has been made in relation to this finding. Recommendation 21: Ensure Annual Returns submitted to EPA by the due date and including a noise compliance assessment report and a blast monitoring report in accordance with Condition R4.1 and R4.2 of the EPL.			
R4.2	Blast Monitoring Report The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return: a) the date and time of the blast; b) the location of the blast on the premises; c) the blast monitoring results at each blast monitoring station; and d) an explanation for any missing blast monitoring results.	Non-compliant (ANC)	2018 Annual Return	See Condition R4.1.			
R4.3	The licensee must report any exceedence of the licence blasting limits to the regional office of the EPA as soon as practicable after the exceedence becomes known to the licensee or to one of the licensee's employees or agents.	Not triggered	Annual Reviews for 2016, 2017 and 2018	Review of available documentation indicates this condition has not been triggered.			
7	GENERAL CONDITIONS						
G1	Copy of licence kept at the premises or plant						
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliant	Site visit Documentation – EPL	Kept in hard copy in a permit compliance folder on-site. Sighted during the site inspection.			
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Compliant	Site interview	EPA visited for a visual site inspection two weeks prior to the audit inspection (3 September 2019), due to their risk based licensing for Jandra Quarry as part of their annual inspection. There has been no follow up correspondence with the EPA since their inspection.			
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliant	Site visit Documentation – EPL	Kept in hard copy in a permit compliance folder on-site. Sighted during the site inspection.			
G2	Other general conditions						
G2.1	Completed Pollution Studies and Reduction Programs (PRPs)	Compliant		Noted. Sighted the operation of the wheel wash during the site inspection.			
	<table border="1"> <thead> <tr> <th>PRP</th> <th>Description</th> <th>Completed</th> </tr> </thead> <tbody> <tr> <td>PRP 1: Installation and Use of a Wheel Wash at the Premises</td> <td>Construction and Utilisation of a vehicular wheel wash for all vehicles exiting the premises.</td> <td>28 October 2011</td> </tr> </tbody> </table>				PRP	Description	Completed
PRP	Description	Completed					
PRP 1: Installation and Use of a Wheel Wash at the Premises	Construction and Utilisation of a vehicular wheel wash for all vehicles exiting the premises.	28 October 2011					

GHD

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Document Status

Revision	Author	Reviewer		Approved for Issue		
		Name	Signature	Name	Signature	Date
0	E Holland	B Bracken		B Bracken		05/12/2019

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