

# **Cooma Road Quarry**

## **Independent Environmental Audit 2024**

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Prepared for Holcim (Australia) Pty Ltd

April 2024

# Cooma Road Quarry

## Independent Environmental Audit 2024

Holcim (Australia) Pty Ltd

E231329 RP#1

April 2024

Version	Date	Prepared by	Approved by	Comments
V1	30 April 2024	Thomas Frankham	Thomas Frankham	Final

Approved by



**Thomas Frankham**  
Associate Environmental Scientist (Lead Auditor Certification No. 207528)  
30 April 2024

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Newcastle NSW 2300

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# Independent Audit Report Declaration Form


Project name	Cooma Road Quarry
Consent number	SSD 5109
Description of project	Cooma Road hard rock quarry and associated infrastructure
Project address	Cooma Road, Queanbeyan, NSW, 2620
Proponent	Holcim (Australia) Pty Ltd
Title of Audit	Cooma Road Quarry Independent Environmental Audit 2024
Date	30 April 2024

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:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the *Independent Audit Compliance Requirements* (Department 2019)
- ii. the findings of the audit are reported truthfully, accurately and completely
- iii. I have exercised due diligence and professional judgement in conducting the audit
- iv. I have acted professionally, objectively and in an unbiased manner
- v. 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
- vi. 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
- vii. 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
- viii. 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.

Note.

- 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.
- 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	Thomas Frankham
Signature	
Qualification	BEnvSc, Certified Lead Environmental Auditor (Exemplar Global - Certification No. 207528)
Company	EMM Consulting
Company address	Level 3, 175 Scott Street, Newcastle NSW 2300

# 1 Introduction

## 1.1 Background

Holcim (Australia) Pty Ltd (Holcim) operates the Cooma Road Quarry, located at 501 Old Cooma Road, Googong, approximately 6 kilometres (km) from Queanbeyan in the Southern Tablelands region of New South Wales (NSW).

Cooma Road Quarry operates under development consent SSD\_5109, granted by the (then) NSW Minister for Planning and Infrastructure on 27 September 2013 under Part 4 of the *Environmental Planning and Assessment Act 1979* (EP&A Act). The consent has been modified twice.

The approved operations at the site include the extraction and processing of hard rock of up to 1.5 million tonnes per annum (Mtpa) and transportation of quarry products by road. The quarry is approved to operate until 31 October 2035.

The layout of the quarry is shown in Figure 1.1.

Cooma Road Quarry also operates pursuant to Environment Protection Licence (EPL) 1453 which authorises scheduled activities being extractive activities and crushing, grinding and separating processes. The permitted scale of these activities is prescribed as >500,000–2,000,000 tonnes annual extraction and processing.

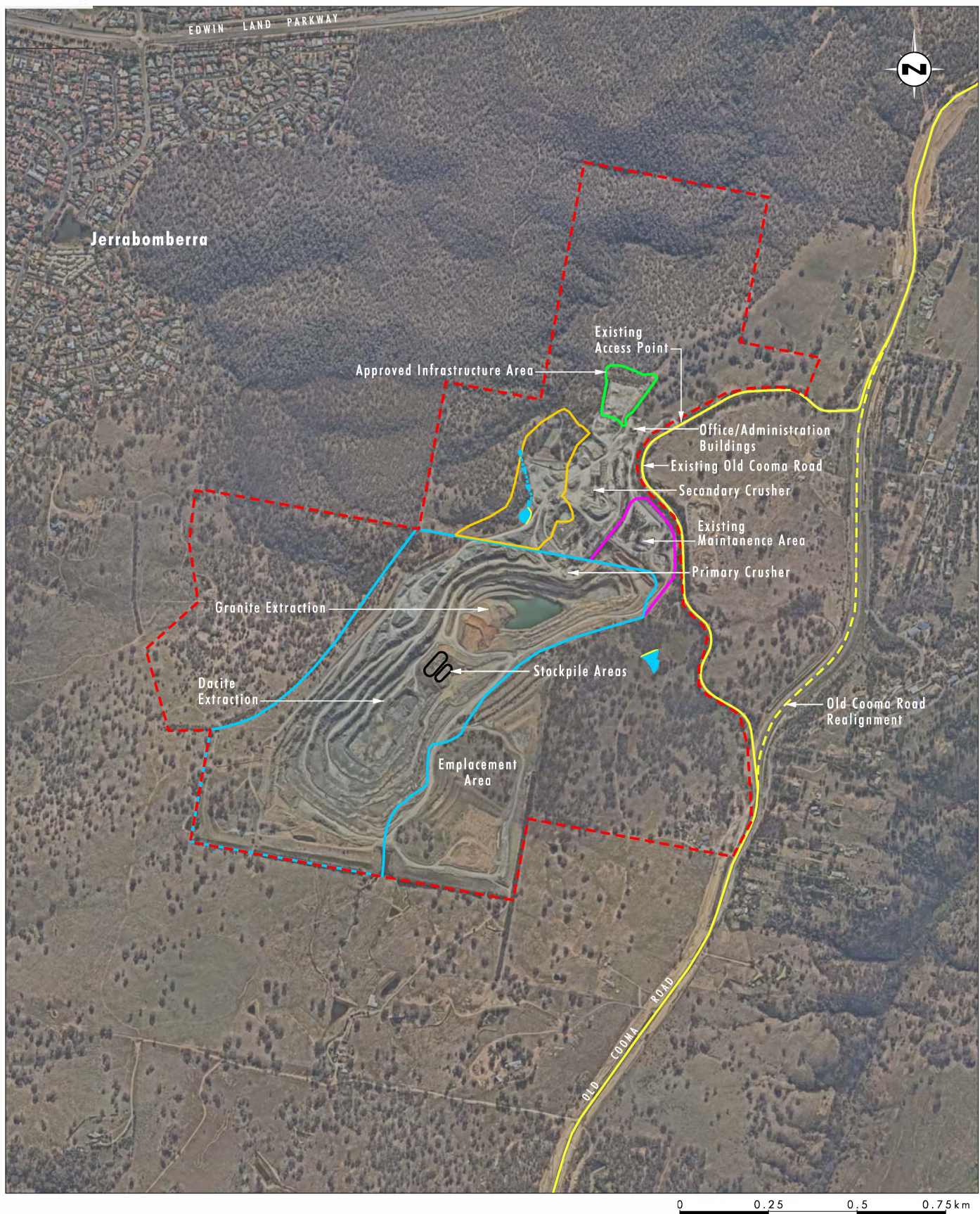


Image Source: Nearmap (May 2019)  
Data Source: Holcim (2019)

1:15 000

#### Legend

- Approved Project Area
- Approved Extraction Area
- Approved Additional Extraction Area
- Approved Disturbance Area - Workshop
- Approved Disturbance Area - Overburden Emplacement
- Approved Dam
- Clean Drain
- Old Cooma Road
- Old Cooma Road Realignment

File Name (A4): R03/4649\_002.dgn  
20190708 15.27

Figure 1.1

**Cooma Road Quarry  
Continued Operations Project**

## 1.2 Audit team

The Independent Environmental Audit (IEA) team includes the team detailed in Table 1.1.

**Table 1.1** IEA team

Name	Role	Company	Qualifications	Experience
Thomas Frankham	Lead auditor (Lead Auditor Certification No. 207528)	EMM	BEnvSc, Certified Lead Environmental Auditor (Exemplar Global - Certification No. 207528)	Associate Consultant 12 years' experience
Allan Young	Strategic advisor and project director	EMM	Master of Urban and Regional Planning Registered Environmental Assessment Practitioner Registered Planner (PIA)	Associate Director 27 years' experience

The engagement of Mr Thomas Frankham as lead auditor was endorsed by the Department of Planning, Housing and Infrastructure (DPHI, formerly the Department of Planning and Environment) on 8 January 2024. A copy of the DPHI endorsement is provided within Appendix A.

## 1.3 Audit objectives

The objective of the IEA is to determine the operational compliance of Cooma Road Quarry against the relevant regulatory approvals applicable to the site. The Audit findings are detailed in Section 3.

## 1.4 Audit scope

The IEA has been completed in accordance with Schedule 5, Condition 10 of development consent SSD\_5109 which states:

Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, The Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
- include consultation with the relevant agencies;
- 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 Licence (including any assessment, plan or program required under these approvals);
- review the adequacy of any approved strategy, plan or program required under these approvals;
- recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals; and
- be conducted and reported to the satisfaction of the Secretary.

Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.

Schedule 5, condition 11 of SSD\_5109 states:

Within 10 weeks of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report.

The IEA has also been prepared in accordance with Section 3.3. of the DPHI *Independent Audit – Post Approval Requirements* (May 2020).

## 1.5 Audit period

The audit period for this IEA covers the period between **1 January 2021 to 2 February 2024**. This represents a period commencing the day after the 2021 IEA declared the end of the previous audit period, through to the final day of the 2024 IEA inspection.

It is noted that this period exceeds 3 years following the previous IEA. This was a result of personal circumstances of the audit team and the date on which EMM Consulting Pty Limited (EMM) was engaged to undertake the IEA. The exceedance of the 3 year period is recorded as a non-compliance within this IEA and discussed further in Section 3.4. Furthermore, DPHI approve a 4 week extension to the submission date of the IEA following the site visit. This allowing additional time for consultation in accordance with the DPHI *Independent Audit – Post Approval Requirements* (May 2020), evidence of this approval is provided in Appendix A.

## 2 Audit methodology

### 2.1 Selection and endorsement of audit team

Holcim contacted DPHI the week of the 1 January 2024 seeking endorsement of the proposed audit team. On 8 January 2024, DPHI responded endorsing the audit team (identified in Section 1.2).

DPHI did not identify that any further technical experts were required to be engaged to inform the audit.

### 2.2 Audit scope development

The IEA scope was developed in accordance with the DPE *Independent Audit – Post Approval Requirements* (May 2020).

On 2 April 2024, EMM requested from DPHI confirmation of any parties or agencies that are required to be consulted with as part of the IEA, in excess then that consulted prior to confirmation from DPHI. It is noted that EMM consulted the Environmental Protection Agency (EPA), Cooma Road Community Consultative Committee (CCC), Queanbeyan-Palerang Regional Council (Council) and the Department of Climate Change, Energy, Environment and Water – Water (DCCEEW – Water) proactively prior to confirmation of agencies to consultant by DPHI. All agencies consulted are confirmed in Section 2.6.

In its correspondence dated 8 April 2024, DPHI did not identify any areas of compliance or environmental management that DPHI would like EMM to focus on.

### 2.3 Compliance evaluation

Compliance of the operations of Cooma Road Quarry were assessed against the approvals and documents listed in Section 3.1.

The process of compliance evaluation involved the following steps:

- review of all approvals applicable to Cooma Road Quarry operations
- development of spreadsheet of all relevant conditions
- site visit including:
  - opening meeting with applicable site personnel (Section 3.13)
  - site inspections (Section 3.11)
  - interviews of relevant site personnel (Section 3.12)
  - closing meeting (Section 3.13)
- requesting additional information from site, where required
- review of all information provided by site, site photos taken during the site inspection (Appendix E) and any notes taken during the site inspection
- further discussions with site personnel, as required.

## 2.4 Site interviews

Cooma Road Quarry personnel interviewed as part of the IEA are noted in Table 2.1.

**Table 2.1** Cooma Road Quarry site personnel interviews

Name	Role
David Manning	Cooma Road Quarry Manager
Dozie Egeonu	Planning and Environment Manager NSW/ACT

## 2.5 Site inspection

The site inspection of Cooma Road Quarry was completed 1 February 2024. EMM consulting observed the following locations during the site inspection:

- Access road.
- Infrastructure area (including administration area, workshops, fuel storage, waste management area).
- Processing plant.
- Stockpile areas.
- Road transport load out facilities.
- Emplacement area.
- Granite and Dacite Extraction areas (pits).
- Insitu environmental monitoring locations.
- Northwest Dam and SIP Dam.
- Recycled concrete stockpile area.

## 2.6 Consultation

Consultation was completed with various government agencies and the community consultative committee (CCC), including:

- Council
- DCCEEW – Biodiversity Conservation Division (BCD)
- DCCEEW – Heritage NSW
- DCCEEW – Water
- DPHI
- EPA

- Ngambri Local Aboriginal Lands Council
- NSW Natural Resource Access Regulator (NRAR)
- NSW Resource Regulator (RR)
- Peter Gordon, Chair of the CCC and associated members
- Transport for NSW (TfNSW).

A summary of the consultation is included in Section 3.7, with evidence of consultation attached as Appendix B and Appendix C.

## 2.7 Compliance status descriptors

The compliance status of each compliance requirement in the audit table (Appendix D) has been determined using the relevant descriptors in Table 2.2.

**Table 2.2** Compliance status descriptors

Status	Description
Compliant	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.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

## 3 Audit findings

### 3.1 Approval and document list

The approvals and documents audited as part of this IEA include:

- Development Consent SSD\_5109
- Environment Protection Licence (EPL) 1453
- water supply works approval 40WA413082 and WAL 33412
- Annual Reviews for 2021, 2022 and 2023
- environmental management plans (required under SSD\_5109)
- non-compliances of the 2021 IEA.

### 3.2 Compliance performance

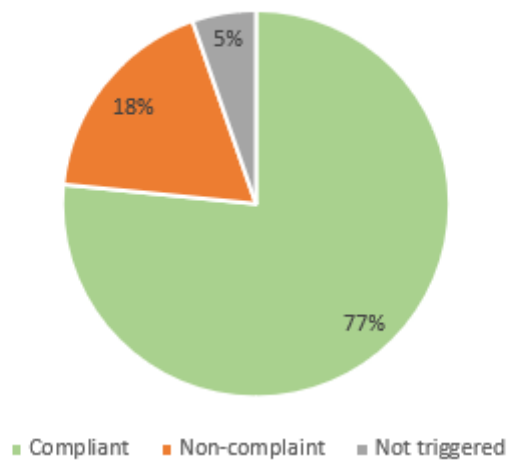
Table 3.1 list the total number of compliance requirements assessed as part of this IEA including the total number of compliant, non-compliant and not triggered conditions.

Figure 3.1 shows the project performance in relation to compliance requirements assessed.

**Table 3.1** Compliance performance

Aspect	Number
Compliance requirements	165
Compliant	132
Non-compliant	23
Not triggered	10

### Compliance Performance



**Figure 3.1** Compliance performance

### 3.3 Summary of agency notices, orders, penalty notices or prosecutions

No orders, penalty notices or prosecutions have been issued during the audit period as reported in the Annual Reviews, EPL register or as advised during site interviews.

### 3.4 Non compliances

A summary of the non-compliances determined as part of the 2024 IEA are provided in Table 3.2.

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
<b>SSD 5109</b>				
Schedule 2, Condition 18	<p>The Applicant must ensure that any 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.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>Under Part 4A of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</li> <li>Part 8 of the EP&amp;A Regulation sets out the requirements for the certification of the development.</li> </ul>	<p>Site interviews</p> <p>Site observations</p>	<p>During the audit period infrastructure was constructed within the relocated infrastructure area approved under SSD5109.</p> <p>No construction or occupation certificates were acquired for the constructed buildings. Holcim is aware of the issue and is in consultation with Queanbeyan City Council to address the matter.</p> <p><b>NC1 Recommendation</b></p> <p>Holcim is aware of the issue and has commenced consultation with Queanbeyan City Council to address the matter. Holcim are to close this matter out in consultation with Queanbeyan City Council during the subsequent audit period.</p>	NC1
Schedule 2, Condition 23	<p>By 31 December 2013, the Applicant must:</p> <ul style="list-style-type: none"> <li>engage a registered surveyor to mark out the boundaries of the approved limits of extraction within the development area</li> <li>submit a survey plan of these boundaries with applicable GPS coordinates to the Secretary.</li> </ul>	<p>Survey plan – Limits of extraction</p> <p>Site inspection of boundary pegs</p>	<p>No evidence of submission of the survey plan to the Secretary was provided.</p> <p><b>NC2 Recommendation</b></p> <p>Submit survey plan of quarry boundaries to the Secretary in accordance with the Consent.</p>	NC2
Schedule 3, Condition 1	<p>The Applicant must keep accurate records of:</p> <ol style="list-style-type: none"> <li>the amount of quarry products, ENM or VENM transported to or from the site (monthly and annually) and publish these records on its website on a quarterly basis</li> <li>the quantity, destination and source of all laden truck movements to and from the site (hourly, daily, weekly, monthly and annually).</li> </ol>	<p>Holcim website - Environmental Truck Movement Data</p> <p>Holcim product database</p>	<ol style="list-style-type: none"> <li>Total quarterly tonnages of product transported from site are made available on the Holcim Cooma Road website. No tonnages for ENM or VENM identified.</li> <li>Sighted Holcim product tracking database records in real time all laden truck movements to and from the site.</li> </ol> <p><b>NC3 Recommendation</b></p> <p>Updated Holcim website to note tonnages of ENM and/or VENM in accordance with the Consent.</p>	NC3

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 3, Condition 14	The Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not exceed the criteria in Tables 4 to 6 at any residence on privately- owned land.	Air Quality Management Plan (September 2019) Annual Review 2021, 2022 and 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))	A total of 9 air quality monitoring non-compliance were reported within the Annual Reviews covering the audit period. Of which 7 related to contamination of samples, missed samples or vandalism of equipment. Two incidents are noted to have been contributed to by quarry operations. <b>NC4 Recommendation</b> a) Review location of air quality monitoring sampling locations and determine if appropriate to re locate to minimise risk of contamination and/or vandalism. b) Review air quality monitoring data and ensure contaminated samples are not included within annual averages, incorrectly influencing data trends.	NC4
Schedule 3, Condition 24	The Applicant must prepare and implement a Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must: a) be prepared in consultation with DRG, DPI, DoI – Water and Council b) be submitted to the Secretary for approval within 12 months of the date of this consent c) describe the short, medium and long term measures that would be implemented to: – manage remnant vegetation and habitat on site – ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent d) include detailed performance and completion criteria for evaluating the performance of the	Rehabilitation Management Plan 2019	A Rehabilitation Management Plan was prepared in September 2019. A copy is available on the Holcim Cooma Road Quarry website. The plan was submitted to DPIE on 10 September 2019 and largely addresses the requirements of the condition. A letter confirming consultation with DPI-Water is provided at Appendix 2 of the RMP. A note at Section 2.2 of the RMP states that a copy of the report was provided to DRG, DPI, DoI-Water and Council. Also noted is that DPIE advised on 7 August 2019 that the update of the management plan could occur without the need to consult with nominated agencies in the Development Consent. Regarding requirement (e) the Rehabilitation Management Plan includes a rehabilitation strategy for the next three years being 2019–2021. As such the plan does not provide a strategy covering the audit period or future years. <b>NC5 Recommendation</b> The Rehabilitation Management Plan is to be updated to reflect the next 3-year period.	NC5

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
	<p>rehabilitation of the site, including triggering remedial action (if necessary)</p> <p>e) include a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for:</p> <ul style="list-style-type: none"> <li>– ensuring compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent</li> <li>– enhancing the quality of remnant vegetation and fauna habitat</li> <li>– establishing vegetation screening to minimise the visual impacts of the site on surrounding receivers</li> <li>– restoring native endemic vegetation and fauna habitat within the rehabilitation area</li> <li>– maximising the salvage of environmental resources within the approved disturbance area, including tree hollows, vegetative and soil resources, for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area</li> <li>– collecting and propagating seed</li> <li>– minimising the impacts on native fauna on site</li> <li>– controlling weeds and feral pests</li> <li>– controlling erosion</li> <li>– controlling access</li> <li>– bushfire management</li> </ul> <p>f) include a program to monitor and report on the effectiveness of these measures, and progress</p>			

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
	<p>against the performance and completion criteria</p> <p>g) include details of who would be responsible for monitoring, reviewing, and implementing the plan</p> <p>h) provide details of the conceptual final landform and associated land uses</p> <p>i) provide details of water management requirements and details of the final void in relation to water storage.</p>			
Schedule 3, Condition 26	<p>Within 3 months of each Independent Environmental Audit (see condition 9 of schedule 5), the Applicant must review, and if necessary revise, the sum of the Rehabilitation 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)</p> <p>c) performance of the implementation of the rehabilitation of the site to date.</p>	Rehabilitation Management Plan 2020	<p>No evidence of review following the July 2021 Independent Environmental Audit.</p> <p><b>NC6 Recommendation</b></p> <p>Ensure management plans are reviewed post Independent Environmental Audits and incidents. Following reviews, correspondence to DPHI to be issued reviews confirming have occurred.</p>	NC6

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 5, Condition 4	<p>Within 3 months of the submission of an:</p> <ul style="list-style-type: none"> <li>j) incident report under condition 7 below</li> <li>k) Annual Review under condition 9 below</li> <li>l) audit report under condition 10 below</li> <li>m) any modifications to this consent,</li> </ul> <p>the Applicant must review, and if necessary revise, the strategies, plans, and programs required under this consent, to the satisfaction of the Secretary.</p> <p>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.</p>	<p>Sighted examples of correspondence from Holcim to DPHI regarding management plan reviews (Holcim letter dated 30 June 2023)</p>	<p>Correspondence sighted confirm management plan reviews post Annual Returns.</p> <p>No evidence of reviews post incidents or audits.</p> <p>No modification occurred during the audit period.</p> <p><b>Recommendation NC7</b></p> <p>As per NC6</p>	NC7

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 5, Condition 5	<p>The Applicant must 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&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity:</p> <ol style="list-style-type: none"> <li>take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur</li> <li>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</li> <li>implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</li> </ol>	Annual Review 2021, 2022 and 2023	<p>A number of exceedances of criteria are noted within the annual reports, including a brief discussion on what caused the exceedance and if DPHI was notified.</p> <p>It is noted that the 2023 Annual Review confirms that an air quality exceedance which occurred in October 2023 was not reported to DPHI. The exceedance related to the loss of a filter paper from a High Volume Air Sampler, not an exceedance of criteria.</p> <p><b>NC8 Recommendation</b></p> <p>Ensure all exceedances and or incidents are report to DPHI. Inclusive of measures taken to stop and or prevent the exceedances from occurring in future, remediation options and adequately report the findings to DPHI.</p> <p>It is noted the exceedances noted in October 2023 related to the loss of a HVAS sample paper, not the exceedance of criteria.</p>	NC8

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 5, Condition 6	<p>The Applicant must establish and operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Community Consultative Committee Guidelines: State Significant Projects (2019), and be operating within 6 months of the date of this consent.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</li> <li>In accordance with the guideline, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council, recognised environmental groups and the local community.</li> </ul>	<p>Annual Review 2021, 2022 and 2023</p> <p>CCC Meeting minutes</p>	<p>The Cooma Road Quarry Community Consultative Committee (CCC) established in 2014.</p> <p>Meetings held 6 monthly and occurred on the following dates during the audit period; April 2021, July 2021, February 2022, 29 November 2022, April 2023 and August 2023.</p> <p>2022 Meeting minutes are not available on the Holcim website, as such is not complaint with the requirements Community Consultative Committee Guidelines: State Significant Projects as updated.</p> <p><b>NC9 Recommendation</b></p> <p>Upload the 2022 CCC meeting minutes to the Holcim website for community access.</p>	NC9
Schedule 5, Condition 7	<p>The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> and identify the development (including the development application number and name) and set out the location and nature of the incident.</p>	<p>Annual Review 2021, 2022 and 2023</p>	<p>A number of exceedances of criteria are noted within the annual reports, including a brief discussion on what caused the exceedance and if DPHI was notified.</p> <p>It is noted that the 2023 Annual Review confirms that an air quality exceedance which occurred in October 2023 was not reported to DPHI. The exceedance related to the loss of a filter paper from a High Volume Air Sampler, not an exceedance of criteria.</p> <p><b>NC10 Recommendation</b></p> <p>As per NC8</p>	NC10

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 5, Condition 7a	<p>Within 7 days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing to <a href="mailto:compliance@planning.nsw.gov.au">compliance@planning.nsw.gov.au</a> and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</p> <p>Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance</p>	Annual Review 2021, 2022 and 2023	<p>A number of exceedances of criteria are noted within the annual reports, including a brief discussion on what caused the exceedance and if DPHI was notified.</p> <p>It is noted that the 2023 Annual Review confirms that an air quality exceedance which occurred in October 2023 was not reported to DPHI. The exceedance related to the loss of a filter paper from a High Volume Air Sampler, not an exceedance of criteria.</p> <p><b>NC11 Recommendation</b></p> <p>As per NC8</p>	NC11
Schedule 5, Condition 8	The Applicant must 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.	Holcim website: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a>	<p>All quarterly noise and truck movement data is available on the Holcim website.</p> <p><b>NC12 Recommendation</b></p> <p>Ensure all environmental performance data required to be reported under the Consent is made publicly available on the Holcim website in accordance with the Consent.</p>	NC12
Schedule 5, Condition 9	<p>By the end of March each year, or other timing as may be agreed by the Secretary, the Applicant must submit a report to the Department reviewing 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>	Annual Review 2021, 2022 and 2023	<p>Sighted evidence of submission of Annual Reviews to DPHI, prior to end of March each year of the audit period.</p> <p>Annual Reviews are available on the Holcim website and CCC provided an updated regarding the Annual Reviews at 6-monthly meetings.</p> <p>No evidence provided of submission of the Annual Review to Council.</p> <p><b>NC13 Recommendation</b></p> <p>Ensure Annual Reviews are issued to Council.</p>	NC13

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
	<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"> <li>– the relevant statutory requirements, limits or performance measures/criteria</li> <li>– requirements of any plan or program required under this consent</li> <li>– the monitoring results of previous years</li> <li>– the relevant predictions in the documents listed in condition 2(a) of Schedule 2</li> </ul> <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</p> <p>f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the development.</p> <p>The Applicant must ensure that copies of the Annual Review are submitted to Council and are available to the Community Consultative Committee (see condition 6 of Schedule 5) and any interested person upon request.</p>			

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 5, Condition 10	<p>Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, The Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ul style="list-style-type: none"> <li>a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary</li> <li>b) include consultation with the relevant agencies</li> <li>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 Licence (including any assessment, plan or program required under these approvals)</li> <li>d) review the adequacy of any approved strategy, plan or program required under these approvals</li> <li>e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals</li> <li>f) be conducted and reported to the satisfaction of the Secretary.</li> </ul> <p>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</p>	<p>2021 Independent Environmental Audit</p> <p>Current audit is the 4th IEA</p>	<p>Previous audit period completed on the 31 December 2020, as such current audit period extends over the 3-year period. Being completed on 2 February 2024.</p> <p><b>NC14 Recommendation</b></p> <p>Ensure IEA lead auditor engaged sufficiently prior to the end of the audit period in future.</p>	NC14

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
Schedule 5, Condition 12	<p>By 30 September 2016, unless otherwise agreed by the Secretary, the Applicant must:</p> <p>a) make the following information publicly available on its website:</p> <ul style="list-style-type: none"> <li>– the documents listed in condition 2(a) of Schedule 2</li> <li>– current statutory approvals for the development</li> <li>– approved strategies, plans or programs</li> <li>– 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</li> <li>– a complaints register, which is to be updated on a quarterly basis</li> <li>– the Annual Reviews (over the last 5 years)</li> <li>– any independent environmental audit, and the Applicant's response to the recommendations in any audit</li> <li>– any other matter required by the Secretary</li> </ul> <p>b) keep this information up-to-date, to the satisfaction of the Secretary.</p>	<p>Holcim Cooma Road website:  <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a></p> <p>Annual Review 2021, 2022 and 2023</p>	<p>The SSD Consent Schedule 2 relates to Administrative Conditions. Condition 2(a) was changed as part of the 2016 Modification, however at the time of the determination in 2013, condition 2(a) referred to the EIS. The EIS is published on the Holcim Cooma Road Quarry website.</p> <p>Strategies, plans and programs (whether approved or otherwise) are available on the Holcim Cooma Road Quarry website.</p> <p>Noise monitoring assessment results are published for the period 2019–2023 on the website.</p> <p>Truck movement data results are published for the period 2016–2023 on the website.</p> <p>EPL and SSD consent are published on the website.</p> <p>EIS is published on the website.</p> <p>Annual Reviews are published for the period 2013–2022.</p> <p>Previous IEA reports for the period 2015–2021 are published on the website.</p> <p>Incident register (which appears to include complaints) is published on the website.</p> <p>Quarterly complaints for 2023 are published on the website. It is noted that the complaints register is not reflective of the complaints data in the Annual Review.</p> <p><b>NC15 Recommendation</b></p> <p>Update complaints register on the Holcim website to accurately record complaints received.</p>	NC15

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
<b>Statement of commitments</b>				
11	Holcim Australia will inspect the physical condition of the Moses Morley's Lime Kiln site on a 6-monthly basis and compare the condition with the photographs contained in this report. The results of these inspections will be reported in the site's Annual Review.	Site Interview (D Manning) Annual Review 2021, 2022 and 2023	Site interviews confirmed Kiln site is inspected 6-monthly, however this is not reported within the Annual Reviews.  <b>NC16 Recommendation</b> Formalise 6-monthly inspections of the Moses Morley's Lime Kiln site are documented and outcomes are reported within the Annual Reviews.	NC16
12	Prior to any blasting or construction activities, photographic/archival recording of the Moses Morley's Lime Kiln site will be undertaken in accordance with Heritage Branch, OEH guidelines Photographic Recording of Heritage Items Using Film or Digital Capture (2006). The photographic/archival record will be updated every five years until the cessation of quarrying activities.	Previous audits	Previous audits confirm initial archival recording of the Moses Morley's Lime Kiln site. No evidence provided of updates to the archival recording.  <b>NC17 Recommendation</b> Update the archival recording of the Moses Morley's Lime Kiln site as per Consent.	NC17

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
<b>EPL 1453</b>				
P1.1	<p>P1 Location of monitoring/discharge points and areas.</p> <p>The following points referred to in the table are identified in the licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to air from the point.</p>	<p>Annual Review, 2021, 2022, 2023.</p> <p>(Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).</p> <p>2021 - PM10 and DDG1-5 monitored (Cooma Road annual review 2021).</p> <p>2022 - PM10 and DDG1-5 monitored (Cooma Road annual review 2022).</p> <p>2023 - PM10 and DDG1-5 monitored (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).</p>	<p>Monitoring undertaken included:</p> <ul style="list-style-type: none"> <li>• 2021 - PM10 and DDG1-5 monitored (Cooma Road annual review 2021).</li> <li>• 2022 - PM10 and DDG1-5 monitored (Cooma Road annual review 2022).</li> <li>• 2023 - PM10 and DDG1-5 monitored (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).</li> </ul> <p>Noted non-compliances:</p> <p>2021: The July 2021 result could not be retrieved from DDG4 due to the funnel being missing from this gauge when sampling was attempted. This was suspected to be the result of vandalism. Therefore, the annual DDG4 average is calculated from less than 12 sampling months.</p> <p>2022: Two DDG samples were missed in April (one lost filter and one invalidated sample).</p> <p>2023: DDG4 April 2023 result exceeded assessment criteria. October 2023 a filter paper of EPA Identification 2 was lost.</p> <p><b>NC18 Recommendation</b></p> <p>Exceedances of criteria have been investigated and associated actions closed as reported in Annual Returns. Site interviews demonstrated the Holcim staff are aware of compliance conditions and appropriate actions to minimise potential exceedance (i.e. modifying operations) no further actions are recommended.</p>	NC18

**Table 3.2**      **Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
L5.3	<p>To determine compliance with condition(s) L3.1 and L3.2:</p> <p>a) air blast overpressure and ground vibration levels must be measured at the "New Blast Monitor" location as shown on the map titled "Cooma Road Quarry Resource Definition Work Program" dated 12 August 2004 for all blasts carried out in or on the premises</p> <p>b) instrumentation used to measure the air blast overpressure and ground vibration levels must meet the requirements of Australian Standard 2187.2 of 1993.</p>	<p>Blast Management Plan (2019)</p>	<p>Blast management plan defines standards required to be satisfied and location of blast monitoring location, which was sighted during audit.</p> <p>No evidence provided that blast monitoring occurs in accordance with Australian Standard 2187.2 of 1993.</p> <p><b>NC19 Recommendation</b></p> <p>Ensure blast monitoring occurs in accordance with Australian Standard 2187.2 of 1993 (as updated) and provide assurance with Annual Reviews.</p>	NC19
M4.1	<p>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.</p>	<p>Holcim Cooma Road website:  <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a>  Annual Review 2021, 2022 and 2023</p>	<p>EIS is published on the website.</p> <p>Annual Reviews are published for the period 2013–2022.</p> <p>Incident register (which appears to include complaints) is published on the website.</p> <p>Quarterly complaints for 2023 are published on the website. It is noted that the complaints register is not reflective of the complaints data in the Annual Review.</p> <p><b>NC20 Recommendation</b></p> <p>As per NC12.</p>	NC20

**Table 3.2 Non-compliances**

Section	Requirement	Evidence	Findings/recommendations	Unique non-compliance identification number
M5.1	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.	Holcim Cooma Road website: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a>	The Cooma Road Website has a phone Number on it: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a> Community Enquiries Phone 0437 427 607 However it is not referenced as Community Complaints line for ease of reference. <b>NC21 Recommendation</b> Holcim to display a number on their website that is easily identifiable as a number for the public to register complaints associated with Holcim's activities.	NC21
M5.2	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.	Holcim Cooma Road website: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a>	The Cooma Road Website has a phone Number on it: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a> Community Enquiries Phone 0437 427 607 However it is not referenced as Community Complaints line for ease of reference. <b>NC22 Recommendation</b> As per NC21 Recommendation	NC22
M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence	Holcim Cooma Road website: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a>	The Cooma Road Website has a phone Number on it: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a> Community Enquiries Phone 0437 427 607 However it is not referenced as Community Complaints line for ease of reference. <b>NC23 Recommendation</b> As per NC21 Recommendation	NC23

### 3.5 Previous audit recommendations

Table 3.3 outlines the previous 2021 audit recommendations and confirmation of action taken to address matters raised during the audit period.

**Table 3.3**      **2021 IEA – Summary of non-compliance findings**

Schedule	Condition	Audit finding 2021	Comments and recommendations from 2021 audit	Status update (2024)
<b>State Significant Development Consent SSD 5109</b>				
Schedule 2, Condition 17	<p>The Applicant must:</p> <ul style="list-style-type: none"> <li>provide annual quarry production data to DRG using the standard form for that purpose; and include a copy of this data in the Annual Review (see condition 4 of schedule 5).</li> </ul>	Non-compliance	<p>No evidence of information provided to Division of Resources and Geoscience provided.</p> <p>Total product distributed provided in Annual Review 2018, 2019 and 2020.</p>	<p><b>Compliant</b> - Quarry production data is reported within the Annual Reviews.</p> <p>Sighted annual mining returns submitted to MEG (formally DRG).</p>
Schedule 2, Condition 23	<p>By 31 December 2013, the Applicant must:</p> <ul style="list-style-type: none"> <li>engage a registered surveyor to mark out the boundaries of the approved limits of extraction within the development area; and submit a survey plan of these boundaries with applicable GPS coordinates to the Secretary.</li> </ul>	Non-compliance	<p>Sighted survey plan showing site boundary and limits of extraction dated May 2021.</p> <p>Evidence has not been provided to indicate that the survey plan has been submitted to the Secretary.</p>	<b>Non-compliant</b> – see NC2.
Schedule 5, Condition 9	<p>By the end of March each year, or other timing as may be agreed by the Secretary, the Applicant must submit a report to the Department reviewing the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <ul style="list-style-type: none"> <li>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</li> <li>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: <ul style="list-style-type: none"> <li>the relevant statutory requirements, limits or performance measures/criteria</li> <li>requirements of any plan or program required under this consent</li> <li>the monitoring results of previous years</li> </ul> </li> </ul>	Non-compliance	<p>Department letters providing feedback of Annual Review sighted for 2018 (23/04/19), 2019 (01/06/20) &amp; 2020 (10/06/21).</p> <p>No evidence Annual reviews submitted to council as requested by the Department.</p>	<b>Non-compliant</b> – see NC13

**Table 3.3**      **2021 IEA – Summary of non-compliance findings**

Schedule	Condition	Audit finding 2021	Comments and recommendations from 2021 audit	Status update (2024)
	<ul style="list-style-type: none"> <li>– the relevant predictions in the documents listed in condition 2(a) of Schedule 2</li> <li>• identify any Non-Compliance over the last year, and describe what actions were (or are being) taken to ensure compliance</li> <li>• identify any trends in the monitoring data over the life of the development</li> <li>• identify any discrepancies between the predicted and actual impacts of the development, and analyse the Potential cause of any significant discrepancies</li> <li>• describe what measures will be implemented over the current calendar year to improve the environmental performance of the development.</li> </ul> <p>The Applicant must ensure that copies of the Annual Review are submitted to Council and are available to the Community Consultative Committee (see condition 6 of Schedule 5) and any interested person upon request.</p>			
<b>Environmental Protection Licence 1453</b>				
Condition M5.1	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.	Non-compliance	Holcim website does not advertise for an easily accessible 'Complaints' telephone number for complaints associated with the Cooma Road Quarry site	<b>Non-compliant</b> – see NC21
Condition M5.2	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.	Non-compliance	The 2017 (1 May 2016 – 30 Apr 2017) Annual Return Form G Statement of Compliance is incomplete. The blasting complaint of March 2017 (as noted in the INX extract) is not noted in the 2017 Annual Return (a similar complaint in 2014 was noted in the 2014 Annual Return).	<b>Non-compliant</b> – see NC22

**Table 3.3**      **2021 IEA – Summary of non-compliance findings**

Schedule	Condition	Audit finding 2021	Comments and recommendations from 2021 audit	Status update (2024)
Condition M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence	Non-compliance	Holcim website does not advertise for an easily accessible 'Complaints' telephone number for complaints associated with the Cooma Road Quarry site.	<b>Non-compliant</b> – see NC23

### 3.6 EMP, sub-plans and compliance documents

To determine the adequacy of the management plans applicable to the operation of Cooma Road Quarry, the EMM audit team conducted reviews of the following plans:

- Management plans and strategies:
  - Transport Management Plan (September 2019) (TMP 2019)
  - Noise Management Plan (September 2019) (NMP 2019)
  - Blast Management Plan (September 2019) (BMP 2019)
  - Air Quality Management Plan (September 2019) (AQMP 2019)
  - Water Management Plan (July 2019) (WMP 2019)
  - Heritage Management Plan (September 2019) (HMP 2019)
  - Rehabilitation Management Plan (September 2019) (RMP 2019)
  - Road Traffic Noise Assessment Report (2014)
  - Environmental Management Strategy (2014).
- Community Consultative Committee (CCC) meeting minutes for April 2021, July 2021, February 2022, November 2022, April 2023 and August 2023.
- Annual Review 2021.
- Annual Review 2022.
- Annual Review 2023

The adequacy and implementation of these plans were also assessed during the site inspection. EMM determined these plans to be adequate for operation and implemented appropriately.

Opportunities for improvement are discussed in detail in Section 3.14.

### 3.7 Consultation outcomes

Consultation was completed with the government agencies and the Chair of the community consultative committee as listed in Section 2.6. A summary of the consultation is included in Table 3.7 with evidence of consultation attached as Appendix B and Appendix C.

**Table 3.4**      **Summary of consultation**

Agency and contact	Method/ correspondence date	Comments (summary) <sup>1</sup>	Auditor response
Community Consultative Committee (CCC) Chair	Letter attached to email sent on 8 January 2024; Acknowledgement letter received on 9 January 2024; response received on 19 January 2024.	<ul style="list-style-type: none"> <li>• The quarry seeks to minimise carbon emissions but it is unclear whether Holcim monitors emissions. Holcim's Sustainability Unit may have information.</li> <li>• Need to assess the adequacy of the Traffic Management Plan (TMP) and the compliance of drivers with obligations under the TMP.</li> <li>• Performance against specific conditions is necessary and not a global assessment.</li> <li>• Statement of independence is required noting that EMM has prepared a SEE for this quarry.</li> <li>• The CCC would appreciate the opportunity to review the audit report.</li> </ul>	<ul style="list-style-type: none"> <li>• The IEA scope largely relates to the conditions of SSD_5109, in which no specific greenhouse gas emissions conditions are contained within. Interviews confirmed mine planning adopts sustainable principles within design, including minimising haul routes and effectively utilising equipment to reduce fuel burn. Any further assessment of 'carbon accounting', is not captured by the IEA scope.</li> <li>• The IEA assessed the adequacy of the TMP and related conditions within SSD_5109, see Appendix D. It is noted that both the quarry and drivers appear to generally operate in accordance with traffic related conditions and management strategies.</li> <li>• All conditions of the SSD_5109 are considered within the compliance table made available in Appendix D.</li> <li>• A statement of independence is provided at the beginning of this document. It is noted that any work historically performed by EMM was conducted outside of the audit period. Furthermore the lead auditor has not conducted any prior work at the operation.</li> </ul>
Queanbeyan-Palerang Regional Council (Council)	Letter attached to email sent on 8 January 2024; automated acknowledgement received on 8 January 2024.	<ul style="list-style-type: none"> <li>• No further comments received.</li> </ul>	No response required.

<sup>1</sup> For full details please refer to the responses which are provided in the appendices.

**Table 3.4**      **Summary of consultation**

Agency and contact	Method/ correspondence date	Comments (summary) <sup>1</sup>	Auditor response
NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water division	Letter attached to email sent on 8 January 2024; Response received on 11 January 2024.	<ul style="list-style-type: none"> <li>• DCCEEW requests that the audit address compliance with the requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation.</li> <li>• This includes water management plans and related subplans such as Site Water Balance, ESCP, Stormwater Management Plan, Groundwater Management Plan; Extraction Plans and related subplans; Water supply; Water take; Water metering; Water Access Licences; and annual reporting.</li> </ul>	<ul style="list-style-type: none"> <li>• Cooma Road Quarry operates under Water Management Plan (July 2019) (WMP 2019) approved July 2019 by DPHI.</li> <li>• Trigger action response plans are identified within the WMP.</li> <li>• Water supply is confirmed in Section 6 of the WMP.</li> <li>• Water take at Cooma Road Quarry is defined via the Water Balance discussed in Section 4 of the WMP. Take inconsideration of licenses held by Cooma Road Quarry is summarised in Annual Reviews.</li> <li>• Water meters are installed at all water extraction points. Recording date and time and the volume of water taken. This was confirmed via site interviews.</li> <li>• Annual reports confirm water take, use and source of water. In addition, Annual Reviews compare result to previous years and identify exceedances and proposed corrective measures as necessary.</li> </ul>
NSW Environment Protection Authority (EPA)	Letter attached to email sent on 8 January 2024; automated acknowledgement received on 8 January 2024	<ul style="list-style-type: none"> <li>• No further comments received.</li> </ul>	No response required.

**Table 3.4**      **Summary of consultation**

Agency and contact	Method/ correspondence date	Comments (summary) <sup>1</sup>	Auditor response
Transport for New South Wales (TfNSW)	Letter attached to email sent on 8 April 2024; Response received on 16 April 2024.	<ul style="list-style-type: none"> <li>TfNSW noted: <ul style="list-style-type: none"> <li>The nearest state road intersection is approximately 1.5 km away.</li> <li>An independent audit is required as part of the conditions of approval for the project.</li> <li>Through discussions with internal stakeholders, TfNSW confirmed that it had no comments or concerns to raise regarding the operation of the Cooma Road Quarry.</li> </ul> </li> <li>TfNSW recommended Council be contacted as the likely recipient of any community feedback.</li> </ul>	<p>No response required.</p> <p>It is noted Council, were consulted as part of the IEA consultation.</p>
NSW Resource Regulator	Letter attached to email sent on 8 April 2024; Response received on 9 April 2024.	<ul style="list-style-type: none"> <li>NSW Resources Regulator records indicate that there are no mining leases under the <i>Mining Act 1992</i> currently associated with the quarry. As such, the Regulator does not have any requirements for the independent audit.</li> </ul>	No response required.
NSW Natural Resource Access Regulator	Letter attached to email sent on 8 April 2024; Response received on 8 April 2024.	<ul style="list-style-type: none"> <li>Email response received differing the matter to DCCEEW – Water.</li> </ul>	<p>No response required.</p> <p>It is noted DCCEEW - Water were consulted as part of the IEA consultation.</p>
DCCEEW – Biodiversity Conservation Division (BCD)	Letter attached to email sent on 8 April 2024. No response received.	<ul style="list-style-type: none"> <li>No response received.</li> </ul>	No response required.
DCCEEW – Heritage NSW	Letter uploaded to the DPHI Major projects portal (reference number PAE – 69590207). No response received.	<ul style="list-style-type: none"> <li>No response received.</li> </ul>	No response required.
Ngambri Local Aboriginal Lands Council	Letter attached to email sent on 8 April 2024. No response received.	<ul style="list-style-type: none"> <li>No response received.</li> </ul>	No response required.

### 3.8 Complaints

A summary of the complaints received over the IEA period are outlined in Table 3.5.

**Table 3.5**      **Summary of complaints**

Aspect	2021	2022	2023
Traffic	1		
Blast		1	1
Noise/Blast			1
Noise			3

All complaints were satisfactorily followed up in accordance with the complaints management strategy outlined in Section 6.4 of the Environmental Management Strategy (EMS).

It is noted that incidents reported on the Holcim website and those reported within Annual reviews differ, this has been identified as per NC15 in Table 3.2. The total complaints as reported in Table 3.5, are based on a review of complaints received by site and confirmed via stie interviews.

### 3.9 Incidents and non-compliance

Table 3.6 provides a summary of the environmental incidents and non-compliance which occurred during the audit period, as reported within the Annual Reviews covering the audit period.

**Table 3.6 Incidents and non-compliance**

Date	Incident	Commentary – as per Annual Returns
January 2021	<b>Above Short Term PM<sub>10</sub> Criteria</b> The site was above the PM10 short term impact assessment criteria for one monitoring event on 2 January 2021. This has been recorded as an exceedance, but the site was not a big factor.	Contamination likely from stock mustering.
July 2021	<b>Air quality monitoring</b> DDG4 July 2021 result could not be retrieved.	Funnel was missing from this gauge when sampling was attempted. This was suspected to be the result of vandalism.
Q1 – 2021	<b>Groundwater monitoring</b> Groundwater monitoring was not undertaken in Quarter 1 2021.	This was due to planning and installation of bores still occurring at that time. Groundwater monitoring as per the WMP commenced in Quarter 2 2021.
April 2022	<b>Air Quality Monitoring</b> Cooma Road missed two samples during April. This has been recorded as a non-compliance. Cooma Road will continue to monitor Air Quality.	Sampling was missed due to a lost filter in once instance and an invalidated sample in the other instance.
November 2022	<b>Air Quality Monitoring</b> DDG4 November 2022 result exceeded assessment criteria This has been recorded as an exceedance; however, the site did not cause this exceedance.	Holcim notified DPE that DDG4 was impacted by organic matter from nearby flowering vegetation.
December 2022	<b>Air Quality Monitoring</b> DDG1 December 2022 result exceeded assessment This has been recorded as an exceedance; however, the site did not cause this exceedance.	Holcim notified DPE that DDG1 was impacted by organic matter from nearby flowering vegetation.
Annual Average	<b>Air Quality Monitoring</b> DDG4 recorded an exceedance over performance criteria. Cooma Road will continue to monitor Air Quality.	
April 2023	<b>Air Quality Monitoring</b> DDG4 April 2023 result exceeded assessment criteria This has been recorded as an exceedance; however, the site did not cause this exceedance.	DDG4 impacted by organic matter from nearby flowering vegetation. A notification was sent to the EPA.
October 2023	<b>Air Quality Criteria</b> On 1 October, a sample not taken due to a lost filter, resulting in a low non-compliance for Schedule 3, Condition 14.	Sample was not taken due to a lost filter.

**Table 3.6**      **Incidents and non-compliance**

Date	Incident	Commentary – as per Annual Returns
October 2023	<b>Air Quality Management Plan</b> Holcim failed to notify the Department of this missed sample, resulting in an administrative non-compliance for Schedule 3, Condition 16.	
October 2023	<b>Non-Compliance Reporting</b> As Holcim failed to notify the Department of the missed sample in October, this is an administrative non-compliance for Schedule 5, Condition 7A.	

### 3.10 Actual verses predicted environmental impacts

The 2020, 2021, 2022 and 2023 annual reviews were reviewed in order to undertake an assessment of the compliance between actual and predicted impacts documented in relevant environmental assessments, including an assessment of the physical extent of the development in comparison with the approved boundary and any potential off-site impacts of the development required under the EP&A Act.

The annual reviews confirm the physical extent of Cooma Road Quarry lies within the approved boundary.

Section 3.9 outlines environmental incidents which occurred during the audit period, as outlined in annual reviews. The air quality incidents outlined in Section 3.9 demonstrate potential for off-site impacts in excess of predicted environmental impacts. The 2021, 2022 and 2023 annual reviews confirm corrective actions taken by Cooma Road Quarry to reduce the risk of reoccurrence. Recommendations are made within this audit, see Chapter 4, to address any further non-compliances identified as part of this audit.

### 3.11 Site inspection

Areas inspected during the site inspection are identified within Section 2.5, with evidence collected through the site inspection summarised below.

Photographs of the below noted areas inspected are available in Appendix E.

#### i Access road

Inspection of the access road was undertaken by the lead auditor during access to and leaving the Cooma Road Quarry. The Access Road was well sign posted and fenced. Appropriate signage identifying speed limits, travel routes, blasting activities and caution regarding animals was sighted.

#### ii Infrastructure area (including administration area, workshops, fuel storage, waste management area)

Inspection of the Infrastructure area was undertaken by the lead auditor under escort by Cooma Road Quarry representatives. The inspection included the site offices, carpark, workshop, wash down bays, store, fuel bay and sumps with waste oil separators. The inspection demonstrated that the infrastructure area was maintained generally in accordance with approved management plans, being well organised and positive segregation of waste streams.

#### iii Processing plant and stockpile areas

Inspection of the processing plant was undertaken by the lead under escort by Cooma Road Quarry representatives. The inspection included the Run of Mine (ROM) pad, ROM hopper, crusher, transfer conveyors, product stockpiles and associated laydown areas.

The inspection demonstrated that the processing plant, stockpiles and associated infrastructure was maintained generally in accordance with approved management plans, being well organised and maintained. Dust controls were in place including water cart and sprays at the time of inspection.

#### iv Road transport load out facilities

Inspection of the processing rail and road transport load out facilities was undertaken by the lead under escort by Cooma Road Quarry representatives. The inspection included areas in which trucks are loaded via loader and associated refuelling and washdown bay for trucks.

The inspection demonstrated that the load out facilities was maintained generally in accordance with approved management plans, being well organised and maintained. During the audit truck loading and washdown prior to leaving site was sighted.

#### v      **Emplacement area**

Inspection of the emplacement area was undertaken by the lead under escort by Cooma Road Quarry representatives. The inspection of the emplacement area demonstrated that the area is currently largely subject of rehabilitation undertaken generally in accordance with approved management plans. Rehabilitation works inspected demonstrated that plantings and seed areas had been successful with minor weed establishment.

#### vi      **Granite and Dacite Extraction areas (pits)**

Inspection of the Granite and Dacite Extraction areas was undertaken by the lead auditor and assistant auditor under escort by Cooma Road Quarry representatives.

The inspection demonstrated that mining activities within the Granite and Dacite Extraction areas was undertaken generally in accordance with approved management plans. At the time of inspection, active mining activities were located within the Dacite Extraction areas, with quarry product being transported to the processing plant. Preclearing was being undertaken on the bench above mining activities. Topsoil removal was being undertaken at the time of inspection and appropriately stockpiled.

#### vii      **Northwest Dam and SIP Dam**

Inspection of the Northwest Dam and SIP Dam was undertaken by the lead auditor under escort Cooma Road Quarry representatives.

The inspection demonstrated that the water storages were being operated in accordance with approved management plans.

#### viii      **Recycled concrete stockpile area**

Inspection of the recycled concrete stockpile area was undertaken by the lead auditor under escort Cooma Road Quarry representatives.

The inspection demonstrated that only recycled concrete was being received by the site. The area was well demarcated and banded. No other materials classified as waste were sighted within the stockpile area.

### 3.12      **Site interviews**

The audit site interviews were completed by the EMM audit team on 1 February 2024. Interviews were conducted with Cooma Road Quarry staff to verify compliance with relevant conditions. A summary of interviews conducted is outlined in Table 3.7.

**Table 3.7**      **Site interviews summary**

Name	Position	Interview matters
David Manning	Quarry Manager	<ul style="list-style-type: none"> <li>• Overview of activities undertaken during the audit period.</li> <li>• Overview of Cooma Road Quarry mining, processing and transport processes.</li> <li>• Overview of operational management systems to ensure environmental compliance.</li> <li>• Discussion on and provision of evidence to demonstrate compliance with relevant Development Consent and EPL.</li> <li>• Overview of how compliance conditions in regard to Aboriginal cultural heritage are satisfied.</li> <li>• Overview of Cooma Road Quarry operational water management systems.</li> <li>• Overview of ground disturbance procedures.</li> <li>• Overview of environmental compliance data.</li> <li>• Overview of rehabilitation and biodiversity management practices.</li> </ul>
Dozie Egeonu	Environment Manager NSW & ACT	<ul style="list-style-type: none"> <li>• Overview of operational management systems to ensure environmental compliance.</li> <li>• Discussion on and provision of evidence to demonstrate compliance with relevant Development Consent and EPL.</li> <li>• Discussion on and provision of evidence to demonstrate suitable corrective actions in regard to prior audit findings.</li> <li>• Overview of complaint management process and internal procedures to address.</li> <li>• Discussion on and provision of evidence in regard to preliminary non-compliances identified prior to the site visit and receipt of data.</li> </ul>

### 3.13 Opening and closing meetings

Opening and closing meetings were held at the commencement and closure of the site visit. Opening and closing meeting attendees are outlined in Table 3.8.

**Table 3.8**      **Opening and closing meeting attendance**

Name	Position
David Manning	Quarry Manager
Dozie Egeonu	Environment Manager NSW & ACT
Thomas Frankham	Lead Auditor and Associate Environmental Scientist

### 3.14 Improvement opportunities

Key opportunities for improvements identified during the audit are noted in the following sections.

#### 3.14.1 Air quality

Air quality monitoring during the audit period failed to capture a significant number of sampling events as required un the SSD 5109 and EPL 1453. Majority of failed data capture events relate to contamination and or vandalism.

It is recommended that Cooma Road Quarry, as outlined by the NC4 Recommendation:

- Review location of air quality monitoring sampling locations and determine if appropriate to re locate to minimise risk of contamination and /or vandalism.
- Review air quality monitoring data and ensure contaminated samples are included within annual averages, incorrectly influencing data trends.

On completion of the above, the risk of failed sampling events would be reduced.

### 3.14.2 Reporting

A number of non-compliances relate to the failure to report information in accordance with SSD 5109, examples include failure to notify of non-compliances or accurate report community complaint data on the Holcim website. It is recommended that Holcim develop improved systems to ensure when a reportable matter occurs it is accurately reported as required under SSD 5109.

## 3.15 Key strengths

Key strengths of Cooma Road Quarry's environmental management and performance identified during the audit are identified in the following sections.

### 3.15.1 Noise, blast and vibration

The NMP and BMP is generally consistent with current best practice, concluding that Cooma Road Quarry has been operated and managed in a competent manner from an acoustic perspective. This demonstrated by minimal non-compliances identified and minimal community complaints received during the audit period, when compared to prior IEAs,

### 3.15.2 Waste

Cooma Road Quarry's segregation of waste streams was noted as a key strength during the site inspection. A number of waste bins of numerous types (i.e. general, steel, paper, oily rags, etc.) were inspected during the audit, with no misplaced waste identified.

## 4 Recommendations

### 4.1 Non-compliances

Details of all non-compliances associated with this 2024 IEA can be found in Section 3.4. Where a non-compliance was identified, a recommendation for improvement was made. This is detailed below in Section 4.2.

### 4.2 Opportunities for improvement

Table 4.1 lists the recommendations made as part of the 2024 IEA.

**Table 4.1 Recommendations**

Recommendation number	Recommendations
<b>NC1 Recommendation</b>	<p>During the audit period infrastructure was constructed within the relocated infrastructure area approved under SSD5109.</p> <p>No construction or occupation certificates were acquired for the constructed buildings. Holcim is aware of the issue and is in consultation with Queanbeyan City Council to address the matter.</p> <p><b>NC1 Recommendation</b></p> <ul style="list-style-type: none"><li>• Holcim is aware of the issue and has commenced consultation with Queanbeyan City Council to address the matter. Holcim are to close this matter out in consultation with Queanbeyan City Council during the subsequent audit period.</li></ul>
<b>NC2 Recommendation</b>	<p>No evidence of submission of the survey plan to the Secretary was provided.</p> <p><b>NC2 Recommendation</b></p> <ul style="list-style-type: none"><li>• Submit survey plan of quarry boundaries to the Secretary in accordance with the Consent.</li></ul>
<b>NC3 Recommendation</b>	<p>a) Total quarterly tonnages of product transported from site are made available on the Holcim Cooma Road website. No tonnages for ENM or VENM identified.</p> <p>b) Sighted Holcim product tracking database records in real time all laden truck movements to and from the site.</p> <p><b>NC3 Recommendation</b></p> <ul style="list-style-type: none"><li>• Updated Holcim website to note tonnages of ENM and / or VENM in accordance with the Consent.</li></ul>
<b>NC4 Recommendation</b>	<p>A total of 9 air quality monitoring non-compliance were reported within the Annual Reviews covering the audit period. Of which 7 related to contamination of samples, missed samples or vandalism of equipment. Two incidents are noted to have been contributed to by quarry operations.</p> <p><b>NC4 Recommendation</b></p> <p>a) Review location of air quality monitoring sampling locations and determine if appropriate to relocate to minimise risk of contamination and /or vandalism.</p> <p>b) Review air quality monitoring data and ensure contaminated samples are included within annual averages, incorrectly influencing data trends."</p>
<b>NC5 Recommendation</b>	<ul style="list-style-type: none"><li>• The Rehabilitation Management Plan is to be updated to reflect the next 3-year period.</li></ul>
<b>NC6 Recommendation</b> (Note this recommendation also addresses NC7)	<ul style="list-style-type: none"><li>• Ensure management plans are reviewed post Independent Environmental Audits and incidents. Following reviews, correspondence to DPHI to be issued reviews confirming have occurred.</li></ul>

**Table 4.1 Recommendations**

Recommendation number	Recommendations
<b>NC8 Recommendation</b> (Note this recommendation also addresses NC10, NC11)	<ul style="list-style-type: none"> <li>Ensure all exceedances and or incidents are report to DPHI. Inclusive of measures taken to stop and or prevent the exceedances from occurring in future, remediation options and adequately report the findings to DPHI.</li> </ul> <p>It is noted the exceedances noted in October 2023 related to the loss of a HVAS sample paper, not the exceedance of criteria.</p>
<b>NC9 Recommendation</b>	<ul style="list-style-type: none"> <li>Upload the 2022 CCC meeting minutes to the Holcim website for community access.</li> </ul>
<b>NC12 Recommendation</b> (Note this recommendation also addresses NC20)	<ul style="list-style-type: none"> <li>Ensure all environmental performance data required to be reported under the Consent is made publicly available on the Holcim website in accordance with the Consent.</li> </ul>
<b>NC13 Recommendation</b>	<ul style="list-style-type: none"> <li>Ensure Annual Reviews are issued to Council.</li> </ul>
<b>NC14 Recommendation</b>	<ul style="list-style-type: none"> <li>Ensure IEA lead auditor engaged sufficiently prior to the end of the audit period in future as to avoid non-compliance with consent timeframes.</li> </ul>
<b>NC15 Recommendation</b>	<ul style="list-style-type: none"> <li>Update complaints register on the Holcim website to accurately record complaints received.</li> </ul>
<b>NC16 Recommendation</b>	<ul style="list-style-type: none"> <li>Formalise 6-monthly inspections of the Moses Morley's Lime Kiln site are documented and outcomes are reported within the Annual Reviews.</li> </ul>
<b>NC17 Recommendation</b>	<ul style="list-style-type: none"> <li>Update the archival recording of the Moses Morley's Lime Kiln site as per Consent.</li> </ul>
<b>NC18 Recommendation</b>	<ul style="list-style-type: none"> <li>As per Table 3.2, no further action is required to address NC18.</li> </ul>
<b>NC19 Recommendation</b>	<ul style="list-style-type: none"> <li>Ensure blast monitoring occurs in accordance with Australian Standard 2187.2 of 1993 (as updated) and provide assurance with Annual Reviews.</li> </ul>
<b>NC21 Recommendation</b> (Note this recommendation also addresses NC22, NC23)	<ul style="list-style-type: none"> <li>Holcim to display a number on their website that is easily identifiable as a number for the public to register complaints associated with Holcim's activities</li> </ul>

## 5 Conclusion

An independent environmental audit of Cooma Road Quarry was undertaken to meet the requirements of Schedule 5, Condition 11 of SSD\_5109 as modified and the relevant policies and guidelines.

Audit evidence was collected during a site inspection on 1 February 2024 and documents provided by Holcim before and after the inspection. The audit period was 30 September 2020 to 1 February 2024. During the audit period the quarry was in normal operational phase.

The matters raised during consultation with agencies at the start of the audit have generally been addressed.

The majority of non-compliances related to:

- documentation not meeting the requirements of SSD 5109 including:
  - notification of incidents or exceedances of criteria to relevant agencies within required timeframes
  - recording/filing of all information required to demonstrate compliance
  - ensuring that all management plans are reviewed and updated within the stipulated timeframes
  - ensuring that the Holcim (Australia) website is kept up to date with all of the required information
- there were also a number of air quality non-compliances during the audit period which have been subsequently addressed.

Overall, the quarry operation is generally being undertaken in a responsible manner and, with the exceptions noted above, in accordance with SSD\_5109 and EPL 1453.

The quarry personnel interviewed generally have a good appreciation of the quarry's development consent and EPL conditions, and the quarry's EMS. The requirements of these documents are being applied in a manner that considers protection of the environment within the context of the site.

Recommendations have been provided to address all non-compliances where further actions are considered to be required.

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# Appendix A

DPHI authorisation of lead auditor and consultation

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NSW Planning ref: SSD-5109-PA-19

Mr David Manning  
Quarry Manager  
HOLCIM (AUSTRALIA) PTY LTD  
LEVEL 8 - 799 PACIFIC HIGHWAY  
CHATSWOOD New South Wales 2067  
08/01/2024

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Sent via the Major Projects Portal only

**Subject: Cooma Road Quarry Continued Operations – Independent Environmental Audit  
2021-2023 Audit team approval request**

Dear Mr Manning

Reference is made to your post approval matter SSD 5109-PA-19 requesting approval of Mr Thomas Frankham (Team Lead) and Mr Allan Young of EMM Consulting Pty Limited (EMM) to undertake the upcoming Independent Environmental Audit (IEA) and prepare the IEA report for Cooma Road Quarry (the development), in accordance with Schedule 5, Condition 10 of State significant development SSD 5109, as modified (the consent).

Having considered the qualifications and experience of Mr Frankham and Mr Young of EMM, the Secretary endorses the appointment of Mr Frankham and Mr Young to undertake the IEA and prepare the IEA report in accordance with Schedule 5, Condition 10 of the consent. This approval is conditional on Mr Frankham and Mr Young being independent of the development.

The audit is to be conducted in accordance with AS/NZS ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing and you may wish to consider the Independent Audit Guideline dated October 2015. A copy of this guideline can be located at <http://planning.nsw.gov.au/Policy-and-Legislation/Mining-and-Resources/Integrated-Mining-Policy>.

The audit report is to include the following:

1. consultation with the relevant agencies;
2. a compliance table indicating the compliance status of each condition of approval and any relevant EPL;
3. not use the term “partial compliance”;
4. recommend actions in response to non-compliances;

5. review the adequacy of plans and programs required under this consent; and
6. identify opportunities for improved environmental management and performance.

Within 10 weeks of commissioning of this audit, Holcim is to submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report and a timetable to implement the recommendations. Prior to submitting the audit report to the Secretary, it is recommended that Holcim review the report to ensure it complies with the relevant consent condition.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

Notwithstanding the endorsement of the above independent audit team for the project, each respective project approval or consent requires a request for endorsement of the independent auditor or audit team be submitted to NSW Planning, for consideration of the Planning Secretary. Each request is reviewed and depending on the complexity of future projects, the suitability of a proposed auditor or audit team will be considered.

Should you wish to discuss the matter further, please contact me on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink, appearing to read "K O'Reilly".

Katrina O'Reilly  
Team Leader - Compliance  
Compliance

As nominee of the Planning Secretary

NSW Planning ref: SSD-5109-PA-23

Mr David Manning  
Quarry Manager  
HOLCIM (AUSTRALIA) PTY LTD  
LEVEL 8 - 799 PACIFIC HIGHWAY  
CHATSWOOD New South Wales 2067  
08/04/2024

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Sent via the Major Projects Portal only

Subject: Cooma Road Quarry Continued Operations - IEA agency consultation

Dear Mr Manning

Reference is made to your post approval matter, SSD-5109-PA-23, Independent Environmental Audit (IEA) agency consultation for Cooma Road Quarry Continued Operations SSD-5109 (as modified) to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 2 April 2024.

NSW Planning requests the below agencies (in addition to the ones mentioned your letter) are also consulted in relation to the IEA:

- Biodiversity Conservation Division
- Local Aboriginal Land Council/s
- NSW Heritage
- NRAR
- TfNSW
- Resource Regulator

Should you wish to discuss the matter further, please contact me on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly

# Department of Planning, Housing and Infrastructure



Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

NSW Planning ref: SSD-5109-PA-22

Mr David Manning  
Quarry Manager  
HOLCIM (AUSTRALIA) PTY LTD  
LEVEL 8 - 799 PACIFIC HIGHWAY  
CHATSWOOD New South Wales 2067  
08/04/2024

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Sent via the Major Projects Portal only

**Subject: Cooma Road Quarry Continued Operations - Independent Environmental Audit (IEA)  
2021-2024 extension to submit report**

Dear Mr. Manning

Reference is made to your post approval matter, SSD-5109-PA-22, request for an extension of time to submit the Independent Environmental Audit (IEA) report and Holcim's Response to Recommendations (RAR), submitted to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 2 April 2024.

NSW Planning has reviewed the letter and notes the reason for the extension request is to enable additional time for agency consultation in accordance with the IAPAR. In accordance with Schedule 5 Condition 10 of SSD 5109 (as modified), the Planning Secretary grants an extension in time to submit the IEA report and RAR until 2 May 2024.

Should you wish to discuss the matter further, please contact me on 0429400261 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely



Katrina O'Reilly  
Team Leader - Compliance  
Compliance  
As nominee of the Planning Secretary

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## Appendix B

### Consultation records – public authorities

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## Department of Climate Change, Energy, the Environment and Water

Our ref: OUT24/236

Allan Young  
EMM Consulting  
Email: [ayoung@emmconsulting.com.au](mailto:ayoung@emmconsulting.com.au)

Date: 11/01/2024

---

Subject: Cooma Road Quarry - Independent Environmental Audit (SSD-5109)

Dear Allan,

I refer to your request seeking advice from the Department of Climate Change, Energy, the Environment and Water on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

The department understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

The department requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
  - Water Management Plans and related sub-plans eg. Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.
  - Extraction Plans and related sub-plans eg. Water Management Plan, Subsidence Management Plan.

## Department of Climate Change, Energy, the Environment and Water

- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception, or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2018.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEE -Water Assessments at [water.assessments@dpie.nsw.gov.au](mailto:water.assessments@dpie.nsw.gov.au)

Yours sincerely,



Pana Panaretos  
A/ Senior Project Officer  
Water Assessments  
Department of Climate Change, Energy, the Environment and Water

8 April 2024

**Cooma Road Quarry – Independent Environmental Audit**  
**Natural Resources Access Regulator**  
**Via [nrar.enquiries@nrar.nsw.gov.au](mailto:nrar.enquiries@nrar.nsw.gov.au)**

Re: Cooma Road Quarry, Queanbeyan - Independent Environment Audit

Dear Officer

EMM Consulting (EMM) has been engaged by Holcim Australia Pty Ltd to undertake the 2024 Independent Environmental Audit (IEA) of the Cooma Road Quarry, Queanbeyan.

The three-yearly IEA is being undertaken to fulfil the requirements of Condition 10 of Schedule 5 of State Significant Development (SSD) Consent 5109. With the purpose of the IEA being to obtain an independent and objective assessment of the environmental performance and compliance status of the quarry.

In accordance with Section 3.2 of the Department of Planning, Housing and Infrastructure (the Department) *Independent Audit – Post Approval Requirements* (2020), EMM has sought advice from the Department in regard to other parties or agencies who should be consulted to assist in informing the scope of the IEA. The Department has advised that the Natural Access Resource Regulator (NRAR) be consulted and advice sort regarding any areas of compliance or environmental management at Cooma Road Quarry, that should be of particular focus and included within the IEA scope.

Broadly the current IEA scope includes:

- to assess the environmental performance of Cooma Road Quarry and its compliance with SSD-5109, Environment Protection Licence (EPL 12939), water supply works approval 40WA413082 and Water Access Licence WAL 33412;
- review the adequacy of strategies and all management plans or programs required under the consent; and
- if necessary, recommend appropriate measures or actions to improve the environmental performance.

Scope considerations received from the NRAR will be recorded and reported in the IEA, to be submitted to the Department and made publicly available.

It would be appreciated if the NRAR could advise EMM of any IEA scope considerations by 17 April 2024, via the contact details provided below.

Thank you for your assistance in this matter.

Yours sincerely



**Thomas Frankham**  
Associate Environmental Scientist | Certified Lead Auditor  
[tfrankham@emmconsulting.com.au](mailto:tfrankham@emmconsulting.com.au)

8 April 2024

**Cooma Road Quarry – Independent Environmental Audit**  
**Transport for New South Wales**  
**Via [development.south@transport.nsw.gov.au](mailto:development.south@transport.nsw.gov.au)**

Re: Cooma Road Quarry, Queanbeyan - Independent Environment Audit

Dear Officer

EMM Consulting (EMM) has been engaged by Holcim Australia Pty Ltd to undertake the 2024 Independent Environmental Audit (IEA) of the Cooma Road Quarry, Queanbeyan.

The three-yearly IEA is being undertaken to fulfil the requirements of Condition 10 of Schedule 5 of State Significant Development (SSD) Consent 5109. With the purpose of the IEA being to obtain an independent and objective assessment of the environmental performance and compliance status of the quarry.

In accordance with Section 3.2 of the Department of Planning, Housing and Infrastructure (the Department) *Independent Audit – Post Approval Requirements* (2020), EMM has sought advice from the Department in regard to other parties or agencies who should be consulted to assist in informing the scope of the IEA. The Department has advised that the Transport for New South Wales (TfNSW) be consulted and advice sort regarding any areas of compliance or environmental management at Cooma Road Quarry, that should be of particular focus and included within the IEA scope.

Broadly the current IEA scope includes:

- to assess the environmental performance of Cooma Road Quarry and its compliance with SSD-5109, Environment Protection Licence (EPL 12939), water supply works approval 40WA413082 and Water Access Licence WAL 33412;
- review the adequacy of strategies and all management plans or programs required under the consent; and
- if necessary, recommend appropriate measures or actions to improve the environmental performance.

Scope considerations received from the TfNSW will be recorded and reported in the IEA, to be submitted to the Department and made publicly available.

It would be appreciated if the TfNSW could advise EMM of any IEA scope considerations by 17 April 2024, via the contact details provided below.

Thank you for your assistance in this matter.

Yours sincerely



**Thomas Frankham**  
Associate Environmental Scientist | Certified Lead Auditor  
[tfrankham@emmconsulting.com.au](mailto:tfrankham@emmconsulting.com.au)

AREQ0052853

Mr Tom Frankham  
EMM Consulting  
Level 3, 175 Scott Street  
Newcastle NSW 2300  
By email: tfrankham@emmconsulting.com.au

Dear Mr Frankham,

**Subject: Cooma Road Quarry – Independent Environmental Audit**

Thank you for your email and letter dated 8 April 2024 requesting consultation on the independent environmental audit to be undertaken of the Cooma Road Quarry.

Records held by the NSW Resources Regulator (the Regulator) indicate that there are no mining leases under the *Mining Act 1992* currently associated with the quarry. As such, the Regulator does not have any requirements for the independent audit.

Yours sincerely

**Jenny Ehmsen**  
Principal Compliance Auditor  
9 April 2024

## Thank you for contacting Queanbeyan-Palerang Regional Council

No-Reply CouncilMail <No-Reply.CouncilMail@qprc.nsw.gov.au>

Mon 1/8/2024 5:49 PM

To: Allan Young <ayoung@emmconsulting.com.au>

CAUTION: This email originated outside of the Organisation.

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Thank you for contacting Queanbeyan-Palerang Regional Council.

This is an acknowledgement that your email has been received and will be forwarded to the appropriate team within QPRC for action.

If you have emailed us about a service request (waste, road conditions, tree matters, sport fields etc) please be advised that next time you would like to raise a matter, you also have the option to lodge via [QPRC Online Services](#). We also highly recommend the free Snap Send Solve app that allows you to take a photo of an issue on your mobile device, upload location and contact details and lodge the matter directly with us easily and quickly.

If you would like to follow up on the progress of your email, please contact us on 1300 735 025 during business hours (8.30am-4.30pm Monday-Friday).

All development related applications must now be lodged via the NSW Planning Portal ([www.planningportal.nsw.gov.au](http://www.planningportal.nsw.gov.au)), including:

- DA / CC Modifications
- Subdivision Certificates
- Section 68 Local Government Approvals (Activity Approvals)
- Notice to Commence (NTC) and Appointment of Principal Certifier
- Document registration by private certifiers
- Occupation Certificates (OC)

Quick Reference Guides to assist with lodgement can be found at the following link:

<https://www.planningportal.nsw.gov.au/applicant-resources>

This is an auto response email. Please do not reply to this email.

### Queanbeyan-Palerang Regional Council

Tel: [1300 735 025](tel:1300735025)

Email: [council@qprc.nsw.gov.au](mailto:council@qprc.nsw.gov.au)

Web: [www.qprc.nsw.gov.au](http://www.qprc.nsw.gov.au)

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# Appendix C

## Consultation records – community

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## RE: E231329 Cooma Road Quarry IEA - Input requested

Peter Gordon <peter.gordon@charterpoint.com.au>

Fri 1/19/2024 11:29 AM

To: Allan Young <ayoung@emmconsulting.com.au>

Cc: Thomas Frankham <tfrankham@emmconsulting.com.au>

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Good morning Allan

Further to your request for input from the Cooma Road Quarry Community Consultative Committee, members offer the input as below:

Member:

There is one point that springs to mind. At the end of the last meeting (21 August?) in noting that the Quarry took steps to minimise Carbon Emissions, it was not clear whether Holcim monitor Carbon emissions. Kurt said he would talk to Holcim Sustainability unit about this.

Related to Carbon Accounting, I then explained about the concept of weathering of certain rocks which can absorb Carbon dioxide from the air, forming carbonates. Basalts/dacites are often basic, ie contain alkaline minerals and Carbon dioxide from the air is dissolved in rain, forming very weak carbonic acid, reacting with many forms of basic rocks. Weathering or crushing of the rocks into finer particles, exposing the grains, accelerates this process.

It might be interesting for the hard rock industry to obtain estimates of the quantities of Carbon dioxide extracted from the air through this process. There are more articles about this on the internet now. I mentioned Assoc Professor Bradley Opdyke from the ANU Research School of Earth Sciences might be able to help a bit here. He can be contacted on 0414 844928, [Bradley.Opdyke@anu.edu.au](mailto:Bradley.Opdyke@anu.edu.au)

Member:

The GRA is pleased to be afforded the opportunity to provide input into the forthcoming Cooma Road Quarry IEA.

I have read the NSW Planning and Environment State Significant Development Consent 5109 relating to the changes to the operating conditions (Modification 1) associated with the quarry as it is available via the internet - document being identified in its header as "Secretary's Environmental Assessment Report". Unfortunately the only signed copy available for perusal did not contain operational links to any of the appendices attached to said consent document. Other related documents include:

- a NSW Government document prepared by the Department of Planning and Infrastructure and entitled "Development Consent; Section 89E of the Environmental Planning and Assessment Act 1979; relating to SSD 5109 being the identification for the Holcim Cooma Road Quarry (this document indicates it was prepared in 2013 and thus it, presumably, relates to the initial application for the quarry). This is an unsigned document but it does contain draft Schedules 1- 5

- a NSW Government document prepared by the Department of Planning and Infrastructure and entitled "State Significant Development Assessment; Cooma Road Quarry Continued Operations Project (SSD 5109); prepared in September 2013; being also entitled the Director-General's Environmental Assessment Report. Whilst this document is signed by various departmental officers, the instrument of consent referred to in it at Section 8 (P 27) is not appended

- an EMM document entitled "Cooma Road Quarry; Statement of Environmental Effects; Modification 2 to Development Consent; February 2019; prepared by EMM for Holcim". \* refer to comments below.

These documents generally all require Holcim to "prepare and implement a detailed traffic management plan for the quarry, including a driver code of conduct". Thus it is probably safe to

assume (often a dangerous path) that the formal signed instrument contains a similar condition. The GRA would like the IEA to assess both the adequacy of the TMP and the drivers' adherence thereto with particular regard to the two issues listed below:

- the housekeeping requirements associated with loadout of the trucks to ensure no loose material is able to fall from the load during transport ex the quarry (we have observed not insignificant quantities of material on the roadway at the intersection of the quarry road and the Old Cooma Road and whilst this may well be removed by road/street sweepers, we are firmly of the view that prevention is much better than cure and that vehicles should not be permitted to exit the quarry without all material securely contained within the body of the tipper - vehicle inspection immediately prior to departure should remedy this issue);

- driver attitude to other road traffic as trucks merge at Old Cooma Road - some drivers have been observed to adopt a "might is right" attitude and say that I am coming across into your lane even when I have no legal right to so do - the code of conduct should address this issue, i.e. compliance with road rules.

I would have thought that the TMP should address both of these matters and seek an explicit comment that it does and that drivers are reminded, inter alia, of their obligations both with regard to security of their load and to the need to comply with the rules of the road. Verifiable observations to demonstrate the results of the audit should be undertaken rather than an acceptance of management assurances that all is okay.

I note that the IEA is to be conducted in accordance with the Independent Audit - Post Approval Requirements (DPE, 2020) and further note that, in accordance with this document, partial compliance is not an acceptable result - the proponent either does, or does not, comply with each condition. Whilst I have not studied these audit requirements in great detail, I would expect that each condition imposed as part of the above-referenced consent be commented upon in its particular application and not simply be part of an overall global assessment along the lines that "the proponent's operations have been audited and are deemed to comply with the consent requirements or conditions". From direct experience with major projects both within NSW and Queensland, I have noted that generic overarching motherhood statements are often included in audits and that whilst this may well be desirable from the proponent's perspective it does not demonstrate quantifiable proof of compliance with individual consent conditions. If it is currently the case within NSW that audits undertaken as described already have to analyse and comment on each aspect of all individual consent conditions, then the above comments may seem superfluous, but not being familiar with the process, it is considered necessary to outline expectations ahead of the audit parameters being established as it would be too late afterwards to try and make any other stipulations.

It is also noted at Section 3.1.1 (P6) of the requirements that the criteria for the independence of the auditors are listed and that the proposed auditor must declare any work it has undertaken on the project to be audited. The declaration of independence to be submitted by the auditor (example attached to the requirements as Appendix A) includes, inter alia, a statement that it is not an environmental representative for the project. Given that the statement of environmental effects associated with Modification 2 to the Development Consent SSD 5109 was prepared by EMM, the company proposed to carry out the audit, for Holcim, the prospect of a (perceived) conflict of interest must at least exist. Presumably a statement addressing this perceived conflict and the associated independence has been prepared and approved within governmental circles.

The GRA would also appreciate the opportunity to review the audit report, not from the perspective of the completeness of the report but merely to see how the audit has been arranged and reported and if any adverse findings have been determined and what corrective actions are deemed appropriate to remedy any such findings.

Happy to discuss any of these matters with you if you wish. Irrespective of the progress or findings of the audit, it is our intention that, as directed at our recent AGM, these matters be raised with Holcim

at the next CCC meeting.

Regards, for and on behalf of, the GRA.

All the best

Kind Regards

Peter Gordon

**charterpoint.**

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**From:** Allan Young <ayoung@emmconsulting.com.au>  
**Sent:** Monday, January 8, 2024 4:39 PM  
**To:** Peter Gordon <peter.gordon@charterpoint.com.au>  
**Cc:** Thomas Frankham <tfrankham@emmconsulting.com.au>  
**Subject:** E231329 Cooma Road Quarry IEA - Input requested

Peter

Please see attached correspondence seeking CCC input to the upcoming independent environmental audit of Holcim's Cooma Road Quarry.

This request is made in accordance with Section 3.2 of the Department of Planning and Environment's *Independent Audit – Post Approval Requirements* (2020).

Should you have any questions regarding this correspondence please do not hesitate to contact me via the below details.

Regards,

Allan

**Allan Young RPIA**

Technical Lead, Urban and Regional Planning



**T** 02 9493 9500  
**M** 0481 988 722  
**LI** [Connect on LinkedIn](#)  
[emmconsulting.com.au](http://emmconsulting.com.au)

**SYDNEY | Ground floor, 20 Chandos Street, St Leonards NSW 2065**

*Our offices will be closed from Friday 22 December 2023 and will reopen on Wednesday 3 January 2024.*



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# Appendix D

## Audit compliance tables

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Development Consent SSD 5109 (MOD2)						
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <del>Compliant</del> / <del>Non-compliant</del> / Not triggered)	Unique Identification Non-compliance	Recommendation
	Schedule 2 Administrative Conditions					
	Obligation to minimise harm to the environment					
1	In addition to meeting the specific performance criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent and/or minimise any material harm to the environment that may result from the construction, operation, or rehabilitation of the development.	EMM did not note any permanent environmental harm during the site inspection.	No material and environmental harm occurred during the audit period.	Compliant		
	Terms of consent					
2	The Applicant must carry out the development: (a) generally in accordance with the EIS, SEE (MOD 1), SEE (MOD 2) and the Development Layout Plan; and (b) in accordance with the conditions of this consent and Statement of Commitments.	EIS, SEE (MOD 1), SEE (MOD 2) Project layout plans. Statement of Commitments.	The development was carried out generally accordance with the approvals and Statement of Commitments.	Compliant		
3	If there is any inconsistency between the documents in condition 2(a), the most recent document must prevail to the extent of the inconsistency. However, the conditions of this consent must prevail to the extent of any inconsistency.	Review of approval documentation and consent.	EMM did not identify any inconsistencies with the requirements of the consent during the audit period.	Not triggered		
4	The Applicant must 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 (including any stages of these documents); (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.	Holcim confirmed that no requirements have been received from the Department during the audit period. Sighted evidence of submission of management plans to the Department annually during the audit period.	Holcim confirmed that no requirements have been received from the Department during the audit period. Sighted evidence of submission of management plans to the Department annually during the audit period.	Compliant		
	Limits on Consent					
5	The Applicant may carry out quarrying operations on the site until 31 October 2035. 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.	Site observation	Audit period within approved operating years.	Compliant		
6	The Applicant must not produce more than 1.5 million tonnes of quarry products at the site in a calendar year.	Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report.	2023 = 1,042,190 t 2022 = 899,442 t 2021 = 1,066,32 t	Compliant		
7	The Applicant must not carry out quarrying operations below 635 m AHD.	Site interviews	Quarry Manager David Manning confirmed quarry operations have not occurred below 635m AHD.	Compliant		
8	Prior to the commissioning of Stage 1 of the Old Cooma Road re-alignment, the Applicant must not transport more than 1 million tonnes of quarry products, ENM or VENM to or from the site in a calendar year.	Previous 2021 Independent Audits. Site interviews	Stage 1 of the Old Cooma Road Realignment has been completed, being opened in July 2020 . As such outside of the audit period, the condition is now redundant.	Compliant		
9	Following the commissioning of Stage 1 of the Old Cooma Road re-alignment, the Applicant must not transport more than a total of 1.5 million tonnes of quarry products, ENM or VENM to or from the site in a calendar year. Note: Stage 1 of the Old Cooma Road re-alignment is a 1.5km section of Old Cooma Road between Wickerslack Lane and Heights Road. Stage 2 is a 4.5km section of Old Cooma Road from Edwin Land Parkway south towards Googong Dam Road.	Previous 2021 Independent Audits. Site interviews Transport records Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report.	Stage 1 of the Old Cooma Road Realignment has been completed, being opened in July 2020 . As such outside of the audit period, the condition is now redundant. Total truck movements and tonnages reported on Holcim website confirm no more the 1.5 Million tonnes transported in calendar year.	Compliant		
10	Prior to the commissioning of the Ellerton Drive Extension, the Applicant must not exceed 50 heavy vehicle movements a day on the section of Cooma Street north of Edwin Land Parkway.	Previous 2021 Independent Audits. Site interviews	Stage 1 of the Old Cooma Road Realignment has been completed, being opened in July 2020 . As such outside of the audit period, the condition is now redundant.	Compliant		
11	Following the commissioning of the Ellerton Drive Extension, the Applicant must not use Cooma Street north of the Edwin Land Parkway as a heavy vehicle transport route to/from the site except for local deliveries to Queanbeyan. Notes: •Ellerton Drive Extension is shown as "Proposed Primary Haulage Route" in Appendix 6. •Other heavy vehicle haulage routes to/from the site are also shown in Appendix 6.	Transport Management Plan 2019 Site induction Site interviews Site observations Hawk eye software	Section 4.0 of the Transport Management Plan confirm transport routes. Site induction includes appropriate routes. Signage along site access roads confirms approved transport routes Holcim owned vehicles equipped with Hawkeye GPS tracking confirming truck locations.	Compliant		
12	The Applicant must not use the section of Crawford Street from Monaro Street to Morrisset Street as a heavy vehicle transport route except with the written permission of Council.	Transport Management Plan 2019 Site induction Site interviews Site observations Hawk eye software	Section 4.0 of the Transport Management Plan confirm transport routes. Site induction includes appropriate routes. Signage along site access roads confirms approved transport routes Holcim owned vehicles equipped with Hawkeye GPS tracking confirming truck locations.	Compliant		
13	For the life of the development, the Applicant must ensure that: a) no more than an average of 48 truck movements per hour occur collectively to and from the site on any day; and b) no more than 30 laden trucks per hour are dispatched from or received at the site collectively.	Annual Review, 2021, 2022, 2023 Sighted 2023 monthly truck tracking		Compliant		
14	The Applicant may receive and process up to 10,000 tonnes of recycled concrete on the site in a calendar year. No other materials classified as waste under the EPA Waste Classification Guidelines 2009 (or its latest version) may be received and processed on the site. Note: This condition does not apply to ENM, VENM or to routine deliveries of other materials to the site.	Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report.	2023 = 7,400 t 2022 = 3,492 t 2021 = 3,499 t	Compliant		
	Surrender of existing development consent					
15	By the end of June 2014 or as otherwise agreed by the Secretary, the Applicant must surrender the development consent (DA 371/94) for existing operations on the site in accordance with Section 104A of the EP&A Act.	Letter to Council surrendering development consent from Holcim (20/06/14) and J. Heffernan (29/05/14)	Compliant as per the previous audit.	Compliant		
16	Prior to the surrender of the existing development consent, the conditions of this consent (including any notes) must prevail to the extent of any inconsistency with the conditions of the existing development consent (DA 371/94). Notes: •This requirement does not extend to the surrender of construction and occupation certificates for existing and proposed building works under Part 4A of the EP&A Act. Surrender of a consent or approval should not be understood as implying that works legally constructed under a valid consent or approval can no longer be legally maintained or used. •The conditions or other requirements of this development consent do not prevent the continued carrying out of development which may be undertaken pursuant to DA 371/94, prior to the surrender of that consent	Letter to Council surrendering development consent from Holcim (20/06/14) and J. Heffernan (29/05/14)	Compliant as per the previous audit.	Compliant		
	Production Data					
17	The Applicant must: a) provide annual quarry production data to DRG using the standard form for that purpose; and b) include a copy of this data in the Annual Review (see condition 4 of schedule 5).	Annual Review, 2021, 2022, 2023 Annual mining returns 2021-22 (ROY0007216) and 2022-23 (ROY0007154)	Quarry production data is reported within the Annual Reviews. Sighted annual mining returns submitted to MEG (formally DRG)	Compliant		
	Structural adequacy					

Development Consent SSD 5109 (MOD2)						
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <del>Compliant</del> / <del>Non-compliant</del> / Not triggered)	Unique Identification Non-compliance	Recommendation
18	The Applicant must ensure that any 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. Notes: •Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works. •Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Site interviews Site observations	During the audit period infrastructure was constructed within the relocated infrastructure area approved under SSD5109. No construction or occupation certificates were acquired for the constructed buildings. Holcim is aware of the issue and is in consultation with Queanbeyan City Council to address the matter.	Non-compliant	NC1	Holcim is aware of the issue and has commenced consultation with Queanbeyan City Council to address the matter. Holcim are to close this matter out in consultation with Queanbeyan City Council during the subsequent audit period.
	Demolition					
19	The Applicant must ensure that all demolition work on site is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Site interviews Scope of works for demolition activities	Holcim engaged licensed demolition contractors to undertake demolition works within the audit period. Scope of works presented confirmed demolition activities occurred in accordance with AS 2601-2001: The Demolition of Structures.	Compliant		
	Protection of public infrastructure					
20	The Applicant must: 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	Annual Review, 2021, 2022, 2023 Site interviews	No incidents or damage reported to public infrastructure during reporting period.	Compliant		
	Operation of plant and equipment					
21	The Applicant must ensure that all plant and equipment used at the site is: a)maintained in a proper and efficient condition; and b)operated in a proper and efficient manner.	OEM maintained reports Equipment pre starts Operator Competency/Qualifications Matrix Site interviews	Sighted evidence of regular maintenance activities in accordance with equipment hours or identification of issue via prestart. Training provided to equipment operators to confirm competent operation.	Compliant		
22	Deleted	Note.				
	Identification of approved limits of extraction					
23	By 31 December 2013, the Applicant must: •engage a registered surveyor to mark out the boundaries of the approved limits of extraction within the development area; and •submit a survey plan of these boundaries with applicable GPS coordinates to the Secretary.	Survey plan – Limits of extraction Site inspection of boundary pegs	No evidence of submission of the survey plan to the Secretary was provided.	Non-compliant	NC2	Submit survey plan of quarry boundaries to the Secretary in accordance with the Consent.
24	While quarrying operations are being carried out, the Applicant must ensure that these boundaries are clearly marked at all times that allows operating staff and inspecting officers to clearly identify the approved limits of extraction.	Site interviews	Clearly visible tall white marker posts installed showing boundary.	Compliant		
	Developer contributions					
25	The Applicant must pay Council \$50,400 (indexed to CPI) for road/intersection upgrade works, in accordance with Council’s Section 94 Contributions Plan and the payment schedule in Appendix 4.	Sighted invoices	Quarry Manager David Manning provided evidence of payments to Council via means payment receipts covering the audit period.	Compliant		
26	The Applicant must pay Council road maintenance contributions of \$0.2911 per tonne for every tonne of quarry product, ENM, VENM or recycled concrete transported to and from the site in accordance with Council’s Section 94 Contributions Plan – No 2 Extractive Industry. Each payment must be: a)paid to Council at the end of each calendar year; and b)based on weighbridge records of the quantity of quarry products, ENM, VENM and recycled concrete transported to and from the site. Note: If the parties are not able to agree on any aspect of the road upgrade and maintenance contributions, either party may refer the matter to the Secretary for resolution.	Sighted invoices	Quarry Manager David Manning provided evidence of payments to Council via means payment receipts covering the audit period.	Compliant		
	Evidence of consultation					
27	Where conditions of this consent require consultation with an identified party, the Applicant must: (a) consult with the relevant party prior to submitting the subject document to the Secretary for approval; and (b) provide details of the consultation undertaken including: •the outcome of that consultation, matters resolved and unresolved; and •details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.	Correspondence Holcim to DPHI re Management Plan Reviews, dated 30 June 2023	June 2023 correspondence to DPHI advised of management plan reviews post 2022 Annual Review. Noting no updates were considered necessary.	Compliant		
	Compliance					
28	The Applicant must ensure that all employees, contractors and sub-contractors are made aware of, and instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the project.	Site induction Operator Competency/Qualifications Matrix	Site induction inclusive of key development consent aspects. Qualification matrix outlines further training requirements of more senior staff responsible for individual aspects of the consent.	Compliant		
	Applicability of guidelines					
29	References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, standards or policies in the form they are in as at the date of this consent.	Noted.				
30	However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, standard or policy	Noted.				
	Schedule 3 - Environmental Performance Standards					
	Monitoring of product transport					
1	The Applicant must keep accurate records of: (a) the amount of quarry products, ENM or VENM transported to or from the site (monthly and annually) and publish these records on its website on a quarterly basis; and (b) the quantity, destination and source of all laden truck movements to and from the site (hourly, daily, weekly, monthly and annually).	Holcim website - Environmental Truck Movement Data Holcim product database	a) Total quarterly tonnages of product transported from site are made available on the Holcim Cooma Road website. No tonnages for ENM or VENM identified. b) Sighted Holcim product tracking database records in real time all laden truck movements to and from the site	Non-compliant	NC3	Updated Holcim website to note tonnages of ENM and / or VENM in accordance with the Consent.
	Transport Management Plan					

Development Consent SSD 5109 (MOD2)																													
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation																							
2	<p>The Applicant must prepare and implement a Transport Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>a)be prepared in consultation with the RMS and Council, and submitted to the Secretary for approval within 6 months of the date of this consent;</p> <p>b)include a drivers’ code of conduct for the development;</p> <p>c)identify and prioritise the haul routes to be used by heavy vehicles, including those roads which are planned but not yet constructed;</p> <p>d)describe the measures that would be implemented to ensure drivers of development-related vehicles comply with the drivers’ code of conduct;</p> <p>e)include a program to monitor the effectiveness of the implementation of these measures; and</p> <p>f)be updated within 3 months of the Applicant identifying a new importation source of ENM or VENM that requires the use of alternate transport route to those identified in Appendix 6.</p> <p>The Applicant must implement the approved management plan as approved from time to time by the Secretary.</p>	<p>Transport Management Plan 2019</p> <p>Site interviews</p>	<p>A Transport Management Plan dated September 2019 sighted.</p> <p>a) Consultation detailed within Section 2.2</p> <p>b) TMP inclusive of drivers code of conduct, see Section 4.3.2</p> <p>c) Prioritised haul routes outlined in Section 4.1.2</p> <p>d) Management controls for implementing drivers code of conduct outlined in Section 4.3 of the TMP</p> <p>e) Section 5 of the TMP outlines program to monitor effectiveness.</p> <p>f) Section 7 of the TMP outlines review requirements including this condition, site interviews did not identify any additional ENM or VENM transport routes to that considered within the consent.</p>	Compliant																									
Independent traffic audit																													
3	<p>If the Ellerton Drive Extension has not been commissioned within 5 years from the date of this consent, unless the Secretary directs otherwise, the Applicant must commission a suitably qualified person, to conduct an Independent Traffic Audit of the heavy vehicle routes associated with the development. This audit must:</p> <p>a)be undertaken in consultation with RMS and Council;</p> <p>b)assess the impact of the development on the performance and safety of the road network, including key intersections compared to the predictions made in the EIS; and</p> <p>c)assess whether an alternative distribution of heavy vehicles and/or additional measures to reduce or mitigate any adverse (or potentially adverse) impacts on the local and regional road network is warranted, to the satisfaction of the Secretary.</p> <p>Within 2 months of receiving the audit report, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the report to the Secretary, with a detailed response to any of the recommendations contained in the audit report, including a timetable for the implementation of any reasonable and feasible measures proposed to address the recommendations in the audit report. The Applicant must then implement the measures identified by the Secretary, to the satisfaction of the Secretary.</p>	<p>Previous 2021 Independent Audits.</p> <p>Site interviews</p>	<p>Ellerton Drive Extension was completed in July 2020.</p>	Compliant																									
Noise																													
4	<p>The Applicant must ensure that the noise generated by the development does not exceed the criteria in Table 1 at any residence on privately-owned land</p> <p>Table 1: Noise criteria dB(A)</p> <table><tr><th rowspan="2">Receiver</th><th>Day Shoulder 6 – 7 am</th><th>Day 7 am – 6 pm</th><th>Evening 6 – 10 pm</th></tr><tr><th>L<sub>Aeq</sub>(15 min)</th><th>L<sub>Aeq</sub>(15 min)</th><th>L<sub>Aeq</sub>(15 min)</th></tr><tr><td>N1, N7, N8, N56, N57, N59, N63, N64, N65</td><td>40</td><td>44</td><td>39</td></tr><tr><td>N67</td><td>36</td><td>41</td><td>35</td></tr><tr><td>All other receivers between N9 and N71 inclusive</td><td>36</td><td>38</td><td>35</td></tr><tr><td>All other receivers</td><td>35</td><td>35</td><td>35</td></tr></table> <p>Notes:</p> <p>To locate the receivers referred to in Table 1 refer to Appendix 5.</p> <p>After the first review on any EPL granted for this development under Section 78 of the POEO Act, nothing in this approval prevents the EPA from imposing stricter noise limits on the quarrying operations on site under the EPL.</p> <p>Appendix 9 sets out the metrological 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 written agreement with the relevant landowner/s to generate</p>	Receiver	Day Shoulder 6 – 7 am	Day 7 am – 6 pm	Evening 6 – 10 pm	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (15 min)	N1, N7, N8, N56, N57, N59, N63, N64, N65	40	44	39	N67	36	41	35	All other receivers between N9 and N71 inclusive	36	38	35	All other receivers	35	35	35	<p>Annual Reviews for 2021, 2022 and 2023</p>	<p>Annual Reviews for 2021, 2022 and 2023 include a summary of quarterly compliance monitoring at 5 representative locations. No exceedances of criteria identified.</p>	Compliant		
Receiver	Day Shoulder 6 – 7 am		Day 7 am – 6 pm	Evening 6 – 10 pm																									
	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (15 min)	L <sub>Aeq</sub> (15 min)																										
N1, N7, N8, N56, N57, N59, N63, N64, N65	40	44	39																										
N67	36	41	35																										
All other receivers between N9 and N71 inclusive	36	38	35																										
All other receivers	35	35	35																										
5	<p>The Applicant must comply with the operating hours set out in Table 2.</p> <table><tr><th rowspan="2">Activity</th><th colspan="3">Operating Hours</th></tr><tr><th>Monday – Friday</th><th>Saturday</th><th>Sundays and Public Holidays</th></tr><tr><td>Primary Crushing, Truck Departures</td><td>6 am – 6 pm</td><td>6 am – 6 pm</td><td rowspan="4">None</td></tr><tr><td>Construction Operations</td><td>7 am – 6 pm</td><td>8 am – 1 pm</td></tr><tr><td>Return Truck Movements</td><td>6 am – 8 pm</td><td>6 am – 8 pm</td></tr><tr><td>Other Operations</td><td>6 am – 10 pm</td><td>6 am – 10 pm</td></tr></table> <p>Note: Maintenance activities may occur at any time provided they are inaudible at privately-owned residences.</p>	Activity	Operating Hours			Monday – Friday	Saturday	Sundays and Public Holidays	Primary Crushing, Truck Departures	6 am – 6 pm	6 am – 6 pm	None	Construction Operations	7 am – 6 pm	8 am – 1 pm	Return Truck Movements	6 am – 8 pm	6 am – 8 pm	Other Operations	6 am – 10 pm	6 am – 10 pm	<p>Annual Reviews for 2021, 2022 and 2023</p> <p>Site interviews</p> <p>Site observations</p>	<p>Annual Reviews for 2021, 2022 and 2023 include a statement that all activities took place within the approved operating hours.</p> <p>Site interviews and observations confirmed operations occurring within approved hours at time of site inspection.</p>	Compliant					
Activity	Operating Hours																												
	Monday – Friday	Saturday	Sundays and Public Holidays																										
Primary Crushing, Truck Departures	6 am – 6 pm	6 am – 6 pm	None																										
Construction Operations	7 am – 6 pm	8 am – 1 pm																											
Return Truck Movements	6 am – 8 pm	6 am – 8 pm																											
Other Operations	6 am – 10 pm	6 am – 10 pm																											
6	<p>The Applicant must:</p> <p>a)implement best management practice to minimise the construction, operational and traffic 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;</p> <p>c)maintain the effectiveness of any noise attenuation on equipment to ensure consistency with the benchmark sound power levels presented in the EIS; and</p> <p>d)regularly assess the results of noise monitoring to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Secretary</p>	<p>Noise Management Plan (September 2019)</p> <p>Annual Reviews for 2021, 2022 and 2023</p> <p>Site interviews</p>	<p>a) The Noise Management Plan (2019) describes best management practice to minimise the construction, operational and traffic noise.</p> <p>(b) As per (a)</p> <p>(c) Section 5.3.3 Sound Power Level Maintenance Testing section of the NMP 2019 states that a Sound Power Level (SWL) testing program will be implemented to ensure compliance with the sound power levels for equipment outlined in the EIS. In addition to regular maintenance of plant and equipment to ensure effective controls are maintained, a Sound Power Audit was undertaken by Muller Acoustic Consulting in December 2018. As confirmed by Site Interviews with David Manning, no new equipment has been purchased since this time. Equipment is maintained as per OEM specifications.</p> <p>(d) Quarterly noise monitoring of operations is undertaken. Reported in 2021, 2022 and 2023 Annual reviews. At the time of audit the Q1 2024 noise monitoring report was not available.</p>	Compliant																									

Development Consent SSD 5109 (MOD2)																	
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <del>Compliant</del> / <del>Non-compliant</del> / Not triggered)	Unique Identification Non-compliance	Recommendation											
7	The Applicant must prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must: a)be prepared in consultation with Council and the EPA, and submitted to the Secretary for approval within 6 months of this consent; b)describe the measures that would be implemented to comply with the: •noise criteria in Table 1; •hours of operation in Table 2; and •operating conditions in Condition 7 above; c)include a monitoring program that: •incorporates quarterly (or as otherwise agreed by the Secretary) attended noise monitoring to evaluate the performance of the development against the noise criteria in Table 1; •includes a protocol for determining exceedances of the noise criteria in Table 1; and •assesses the sound power levels of the equipment on site, compares it with the benchmark levels used in the EIS, and evaluates the effectiveness of any attenuation. The Applicant must implement the approved management plan as approved from time to time by the Secretary.	Noise Management Plan (September 2019)	A Noise Management Plan (September 2019) has been prepared and is published on Holcim website. The Noise Management Plan, was developed in 2014, the latest revision was submitted to (then) DPIE on 24 September 2019. a) No record of Secretary approval is noted within the NMP however this has been found compliant in previous Independent Environmental Audits, NMP states that copies were provided to EPA and Council for comment on 14 March 2014. Section 2.3 of the NMP notes how agency feedback has been incorporated. b) NMP includes criteria and performance measures. See Sections 4, 5 and 5.1. c) Section 6 of the NMP includes noise monitoring and reporting regime, and protocols for exceedances.	Compliant													
8	Within 6 months from the date of this consent, the Applicant must commission a suitably qualified person, to conduct an Independent Road Noise Audit of the Edwin Land Parkway. This audit must: a)be undertaken in consultation with Council and the EPA; b)assess the noise generated by heavy vehicles generated by the development on the Edwin Land Parkway against the relevant criteria under the NSW Road Noise Policy; and c)consider whether additional mitigation measures are required to address any potential exceedances under the criteria specified in the NSW Road Noise Policy, to the satisfaction of the Secretary. Within 2 months of receiving the audit report, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the report to the Secretary, with a detailed response to any of the recommendations contained in the audit report, including a timetable for the implementation of any reasonable and feasible measures proposed to address the recommendations in the audit report. The Applicant shall then implement the measures identified by the Secretary, to the	Previous 2021 Independent Audit. Site interviews	Found to be compliant as per previous IEA - Independent Road Noise Audit of the Edwin Lane Parkway (Rudds 2014).	Compliant													
Blasting																	
9	The Applicant must ensure that the blasting on the site does not cause exceedances of the criteria in Table 3. <table><tr><th>Location</th><th>Airblast overpressure (dB(Lin Peak))</th><th>Ground vibration (mm/s)</th><th>Allowable exceedance</th></tr><tr><td rowspan="2">Any residence on privately-owned land</td><td>120</td><td>10</td><td>0%</td></tr><tr><td>115</td><td>5</td><td>5% of the total number of blasts over a period of 12 months</td></tr></table> However, these criteria do not apply if the Applicant has a written agreement with the relevant owner or infrastructure provider/owner, and the Applicant has advised the Department in writing of the terms of this agreement.	Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance	Any residence on privately-owned land	120	10	0%	115	5	5% of the total number of blasts over a period of 12 months	Annual Reviews 2021, 2022 and 2023 2023 - Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))	Annual Reviews 2021, 2022 and 2023 and associated monitoring data confirm all blast within criteria.	Compliant		
Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance														
Any residence on privately-owned land	120	10	0%														
	115	5	5% of the total number of blasts over a period of 12 months														
10	The Applicant must: a)not carry out blasting on site on weekends or public holidays; and b)only carry out blasting on site between 9 am and 3 pm Monday to Friday.	Annual Reviews 2021, 2022 and 2023 2023 - Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))	Annual Reviews 2021, 2022 and 2023 and associated monitoring data confirm all blast within criteria.	Compliant													
11	The Applicant may carry out a maximum of 1 blast a day unless an additional blast is required following a blast misfire. <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 mine.</i>	Annual Reviews 2021, 2022 and 2023 2023 - Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))	Annual Reviews 2021, 2022 and 2023 and associated monitoring data confirm all blast within criteria.	Compliant													
12	During blasting operations, the Applicant must: a)not cause any adverse blasting impacts on the Moses Morley Kiln Site; b)implement best management practice to: •protect the safety of people and livestock in the surrounding area; •protect public or private infrastructure/property in the surrounding area from any damage; and •minimise the dust and fume emissions of any blasting; and c)operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site, to the satisfaction of the Secretary.	Blast Management Plan (September 2019) Annual Review 2021, 2022 and 2023	Blasting records indicate compliance. Annual Review reports state that a text message is sent to neighbouring properties 24 hours before a blast. Proposed blast particulars advertised when on signage when accessing site.	Compliant													
13	The Applicant must prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must: a)be prepared in consultation with Council and the EPA, and submitted to the Secretary for approval within 6 months of the date of this consent; b)describe the measures that would be implemented to ensure: •best management practice is being employed; •the protection of road users and infrastructure when blasting within 500 metres of Old Cooma Road; and •compliance with the relevant conditions of this consent; c)include a specific blast fume management protocol to demonstrate how emissions will be minimised including risk management strategies if blast fumes are generated; and d)include a monitoring program for evaluating the performance of the development including: •compliance with the blasting criteria; and •minimising blasting fume emissions from the site. The Applicant must implement the approved management plan as approved from time to time by the Secretary.	Blast Management Plan (September 2019) Annual Review 2021, 2022 and 2023	a) Sighted consultation letters in Appendix 2 – Stakeholder Consultation of Blast Management Plan 2019. DPIE’s consultation letter dated 07/08/2019 notes that the Secretary has agreed that the company’s revision of management plans, triggered by the approval of Mod 2, may occur without consulting the agencies nominated in the relevant conditions of consent, with the exception of one plan not relevant to this condition. DPIE’s approval of the Blast Management plan - letter dated 31/10/2019. (b), (c) and (d) are addressed on Blast Management Plan 2019. (d) There were no overpressure or vibration exceedances, as per Annual Review 2021, 2022 and 2023. It is noted that there were two community complaints received for blasting, however blast were demonstrated to be within compliance.	Compliant													
Air Quality																	

Development Consent SSD 5109 (MOD2)																													
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <del>Compliant</del> / <del>Non-compliant</del> / Not triggered)	Unique Identification Non-compliance	Recommendation																							
14	<p>The Applicant must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not exceed the criteria in Tables 4 to 6 at any residence on privately- owned land</p> <p>Table 4: Long-Term Impact Assessment Criteria for Particulate Matter</p> <table><tr><th>Pollutant</th><th>Averaging period</th><th><sup>d</sup> Criterion</th></tr><tr><td>Total suspended particulates (TSP)</td><td>Annual</td><td>≈ 90 µg/m<sup>3</sup></td></tr><tr><td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td><td>Annual</td><td>≈ 30 µg/m<sup>3</sup></td></tr></table> <p>Table 5: Short Term Impact Assessment Criteria for Particulate Matter</p> <table><tr><th>Pollutant</th><th>Averaging period</th><th><sup>d</sup> Criterion</th></tr><tr><td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td><td>24 hour</td><td>≈ 50 µg/m<sup>3</sup></td></tr></table> <p>Table 6: Long-Term Impact Assessment Criteria for Deposited Dust</p> <table><tr><th>Pollutant</th><th>Averaging period</th><th>Maximum increase in deposited dust level</th><th>Maximum total deposited dust level</th></tr><tr><td>≈ Deposited dust</td><td>Annual</td><td>≈ <sup>b</sup> 2 g/m<sup>2</sup>/month</td><td>≈ <sup>a</sup> 4 g/m<sup>2</sup>/month</td></tr></table>	Pollutant	Averaging period	<sup>d</sup> Criterion	Total suspended particulates (TSP)	Annual	≈ 90 µg/m <sup>3</sup>	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	≈ 30 µg/m <sup>3</sup>	Pollutant	Averaging period	<sup>d</sup> Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	≈ 50 µg/m <sup>3</sup>	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	≈ Deposited dust	Annual	≈ <sup>b</sup> 2 g/m <sup>2</sup> /month	≈ <sup>a</sup> 4 g/m <sup>2</sup> /month	<p>Air Quality Management Plan (September 2019) Annual Review 2021, 2022 and 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023)))</p>	<p>A total of 9 air quality monitoring non-compliance were reported within the Annual Reviews covering the audit period. Of which 7 related to contamination of samples, missed samples or vandalism of equipment. Two incidents are noted to have been contributed to by quarry operations.</p>	Non-compliant	NC4	<p>a) Review location of air quality monitoring sampling locations and determine if appropriate to re locate to minimise risk of contamination and /or vandalism. B) Review air quality monitoring data and ensure contaminated samples are included within annual averages, incorrectly influencing data trends.</p>
Pollutant	Averaging period	<sup>d</sup> Criterion																											
Total suspended particulates (TSP)	Annual	≈ 90 µg/m <sup>3</sup>																											
Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	≈ 30 µg/m <sup>3</sup>																											
Pollutant	Averaging period	<sup>d</sup> Criterion																											
Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	≈ 50 µg/m <sup>3</sup>																											
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level																										
≈ Deposited dust	Annual	≈ <sup>b</sup> 2 g/m <sup>2</sup> /month	≈ <sup>a</sup> 4 g/m <sup>2</sup> /month																										
15	<p>The Applicant must:</p> <p>(a) take all reasonable steps to:</p> <p>(i) minimise odour, fume, greenhouse gas and dust (including PM10 and PM2.5) emissions generated by the development;</p> <p>(ii) minimise any visible off-site air pollution generated by the development; and</p> <p>(iii) minimise the extent of potential dust generating surfaces exposed on the site at any given point in time;</p> <p>(b) operate an air quality management system to guide the day to day planning of quarrying operations and implementation of both proactive and reactive air quality mitigation measures to ensure compliance with the relevant conditions of this consent;</p> <p>(c) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note d for Tables 4 – 6 above);</p> <p>(d) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions in this consent; and</p> <p>(e) regularly assess meteorological and air quality monitoring data and relocate, modify or stop operations on the site to ensure compliance with the relevant conditions of this consent.</p>	<p>Air Quality Management Plan 2019 Annual Review 2021, 2022 and 2023 Site inspection Site interviews (D Manning)</p>	<p>a) (i), (ii) and (iii) Requirements are addressed by the Air Quality Management Plan Sections 5 and 6 and implementation confirmed via stie inspection. b) Requirement addressed by the Air Quality Management Plan Sections 5 and implementation confirmed via stie inspection and interviews. c) as per (b) d) Air quality monitoring is carried out as per Section 6 of the Air Quality Management Plan, noting non-compliance against criteria did occur within the audit period. e) Quarry Manager aware of consent obligations and manages quarry production to ensure compliance is continued.</p>	Compliant																									
16	<p>the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary;</p> <p>(b) be prepared in consultation with the EPA;</p> <p>(c) describe the measures to be implemented to ensure:</p> <p>(i) compliance with the air quality criteria and operating conditions in this consent;</p> <p>(ii) best practice management is being employed; and</p> <p>(iii) air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;</p> <p>(d) describe the air quality management system; and</p> <p>(e) include an air quality monitoring program that:</p> <p>(i) is capable of evaluating the performance of the development against the air quality criteria;</p> <p>(ii) adequately supports the air quality management system; and</p> <p>(iii) includes a protocol for identifying any air quality-related exceedance, incident or noncompliance and for notifying the Department and relevant stakeholders of these events.</p>	<p>Air Quality Management Plan 2019</p>	<p>Approval of MOD2 occurred Air Quality Management Plan reviewed by auditor confirming it generally contains the nominated list of inclusions. Department of Planning, Industry &amp; Environmental approval letter for Noise, Blast, Air Quality, Heritage &amp; Rehabilitation Management Plans dated 31/10/19 sighted.</p>	Compliant																									
Meteorological Monitoring																													
17	<p>For the life of the development, the Applicant must ensure that there is a suitable meteorological monitoring station operating in the vicinity of the site that:</p> <ul style="list-style-type: none"><li>•complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales guideline; and</li><li>•is capable of continuous measurement of stability class, in accordance with the NSW Industrial Noise Policy, or as otherwise approved by EPA.</li></ul>	<p>Air Quality Management Plan (2019)</p>	<p>Section 6.4 of the Air Quality Management Plan 2019 notes that a meteorological station has been installed at Cooma Road Quarry as detailed in Figure 6-1 of the plan. The meteorological monitoring data is obtained from the station in accordance with this condition.</p>	Compliant																									
Soil & Water																													
<p>Note: The Applicant is required to obtain the necessary water licences for the development under the Water Act 1912 and/or the Water Management Act 2000.</p>		<p>Water Access Licence: WAL33412 Water supply works approval: 40WA413082</p>	<p>Water license issued under Water Management Act 2000, sighted on site as extract from NSW Water Register.</p>	Compliant																									
18	<p>The Applicant must ensure it has sufficient water during all stages of the development, and if necessary, adjust the scale of quarrying operations on site to match its available supply and licensed water entitlements.</p>	<p>Site inspection Site interviews (D Manning) Water Management Plan (July 2019)</p>	<p>Section 4 of the Water Management Plan, includes the site water balance and confirmation of water source and use. Site inspection and site interviews confirmed ample water was available on site to support operation.</p>	Compliant																									
19	<p>The Applicant must comply with the discharge limits in any EPL or with Section 120 of the POEO Act.</p>	<p>Water Management Plan (July 2019) Annual Review 2021, 2022 and 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))) Site inspection</p>	<p>Monitoring of the Licensed Discharge Point (LDP1), within Barracks Creek occurred within the 2021, 2022 and 2023 as outlined in the Annual Reviews and the (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))). A number of exceedances of criteria where recorded within the audit period. However it is noted all Annual Reviews confirm no discharge occurred during the relevant years, as such Cooma Road Quarry believe that these exceedances originate offsite and upstream of Barracks Creek sampling area.</p>	Compliant																									

Development Consent SSD 5109 (MOD2)																				
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation														
20	<p>The Applicant shall prepare and implement a Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with the EPA and DoI -- Water by suitably qualified and experienced person/s whose appointment has been approved by the Secretary and be submitted to the Secretary for approval within 6 months of the date of this consent. This plan must include a:</p> <p>a)Site Water Balance that includes details of:</p> <ul style="list-style-type: none"><li>•sources and security of water supply, including contingency planning;</li><li>•water use on site; and</li><li>•measures that would be implemented to minimise use of clean water and maximise recycling of dirty water on the site;</li></ul> <p>b)Surface Water Management Plan that includes:</p> <ul style="list-style-type: none"><li>•baseline data on surface water flows and quality in the watercourses that could be affected by the development;</li><li>•a detailed description of the surface water management system on site, including the design objectives and performance criteria for the: –clean water diversions; –erosion and sediment controls; –water storages (including Maximum Harvestable Rights requirements); and –control of water pollution from areas of the site that have been rehabilitated;</li><li>•performance criteria, including trigger levels for investigating any potentially adverse surface water quality impacts;</li><li>•a program to monitor: –any surface water discharges; –the effectiveness of the water management system; –surface water flows and quality in local watercourses; and –ecosystem health of local watercourses;</li></ul> <p>c)Groundwater Monitoring Program that includes:</p> <ul style="list-style-type: none"><li>•baseline data of groundwater levels surrounding the development;</li><li>•groundwater assessment criteria based upon analysis of baseline data for groundwater, including trigger levels for investigating any potentially adverse groundwater impacts; and</li><li>•a program to monitor and/or validate the impacts of the development on groundwater resources;</li></ul> <p>d)Surface and Ground Water Response Plan that describes the measures and/or procedures that would be implemented to:</p> <ul style="list-style-type: none"><li>•respond to any exceedances of the surface water and groundwater assessment criteria; and</li></ul>	Water Management Plan (July 2019)	A Water Management Plan was prepared in July 2019. A copy is available on the Holcim Cooma Road Quarry website and includes the requirements of the condition. Appendix 1 to the WMP includes endorsement by DPE of the WMP author as suitable qualified. Water Management Plan approved by DPE 12/08/19.	Compliant																
mitigate and/or offset any adverse impacts on surface water and groundwater resources located within and adjacent to the Heritage																				
21	<p>The Applicant must prepare and implement a Heritage Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>a)be prepared in consultation with Aboriginal stakeholders for matters relating to Aboriginal heritage values and Council for matters relating to non-Aboriginal heritage;</p> <p>b)be submitted to the Secretary for approval within 6 months of the date of this consent;</p> <p>c)describe the measures that would be implemented for:</p> <ul style="list-style-type: none"><li>•monitoring, maintaining and protecting the Moses Morley Lime Kiln site;</li><li>•managing the discovery of any human remains or previously unidentified heritage objects on site;</li><li>•ensuring ongoing consultation with Aboriginal stakeholders in the conservation and management of any Aboriginal cultural heritage values on site; and</li><li>•protecting sites identified adjacent to the development.</li></ul> <p>The Applicant must implement the approved management plan as approved from time to time by the Secretary.</p>	Heritage Management Plan (2019) Annual Review 2021, 2022 and 2023 Site inspection	A Heritage Management Plan was prepared in September 2019 and provided to DPIE on 24 September 2019. The plan includes the requirements of the condition. Department of Planning, Industry & Environmental approval letter for Noise, Blast, Air Quality, Heritage & Rehabilitation Management Plans dated 31/10/19 sighted. Section 2.3.1 of the Heritage Management Plan identifies that the previous version of the HMP was sent to Ngambri Elders/Ngambri Local Aboriginal Land Council (NLALC) on 24 February 2014 for review and cultural input. NLALC responded on 4 March 2014 with minor changes to the document requested. There were no objections to the management strategy in the HMP.	Compliant																
Rehabilitation																				
22	<p>The Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the proposed rehabilitation strategy in the EIS and Appendix 7, and comply with the objectives in Table 7.</p> <p>Table 7: Rehabilitation Objectives</p> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>Site (as a whole)</td><td>Safe, stable and non-polluting</td></tr><tr><td>Surface Infrastructure</td><td>To be decommissioned and removed (unless otherwise agreed with the Secretary)</td></tr><tr><td>Benched Quarry Walls</td><td>Landscaped and revegetated utilising native tree and understorey species, ensuring that the tree canopy is restored and integrated with the surrounding canopy to minimise visual impacts</td></tr><tr><td>Quarry Pit Floors</td><td>Landscaped and revegetated utilising native flora species, above the anticipated final void water level</td></tr><tr><td>Other land affected by the development</td><td>Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprised of:<ul style="list-style-type: none"><li>- native endemic species; and</li><li>- a landform consistent with Appendix 7 and the surrounding environment.</li></ul></td></tr><tr><td>Community</td><td><ul style="list-style-type: none"><li>• Ensure public safety</li><li>• Minimise the adverse socio-economic effects associated with the closure of the development</li></ul></td></tr></table> <p>Note: Revegetation of existing and proposed industrial areas is not required.</p>	Feature	Objective	Site (as a whole)	Safe, stable and non-polluting	Surface Infrastructure	To be decommissioned and removed (unless otherwise agreed with the Secretary)	Benched Quarry Walls	Landscaped and revegetated utilising native tree and understorey species, ensuring that the tree canopy is restored and integrated with the surrounding canopy to minimise visual impacts	Quarry Pit Floors	Landscaped and revegetated utilising native flora species, above the anticipated final void water level	Other land affected by the development	Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprised of: <ul style="list-style-type: none"><li>- native endemic species; and</li><li>- a landform consistent with Appendix 7 and the surrounding environment.</li></ul>	Community	<ul style="list-style-type: none"><li>• Ensure public safety</li><li>• Minimise the adverse socio-economic effects associated with the closure of the development</li></ul>	Rehabilitation strategy in EIS Rehabilitation Management Plan 2019 Annual Review 2021, 2022 and 2023 Site inspection Site interviews	Rehabilitation activities where appropriate have occurred in accordance with the Rehabilitation Strategy outlined in the EIS and constant with the principles of the Rehabilitation Management Plan, reflective of Table 7 of the Consent, as confirmed via Site Interviews and Observations. Annual reviews report rehabilitation activities undertaken during the audit period.	Compliant		
Feature	Objective																			
Site (as a whole)	Safe, stable and non-polluting																			
Surface Infrastructure	To be decommissioned and removed (unless otherwise agreed with the Secretary)																			
Benched Quarry Walls	Landscaped and revegetated utilising native tree and understorey species, ensuring that the tree canopy is restored and integrated with the surrounding canopy to minimise visual impacts																			
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Other land affected by the development	Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprised of: <ul style="list-style-type: none"><li>- native endemic species; and</li><li>- a landform consistent with Appendix 7 and the surrounding environment.</li></ul>																			
Community	<ul style="list-style-type: none"><li>• Ensure public safety</li><li>• Minimise the adverse socio-economic effects associated with the closure of the development</li></ul>																			
23	<p>The Applicant must 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>	Rehabilitation Management Plan 2019 Site inspection Site interviews	Rehabilitation activities where appropriate have occurred in accordance with the Rehabilitation Strategy outlined in the EIS and constant with the principles of the Rehabilitation Management Plan, reflective of Table 7 of the Consent, as confirmed via Site Interviews and Observations. Annual reviews report rehabilitation activities undertaken during the audit period. Site observations confirmed land disturbance is maintained to a minimum and temporary stabilisation methods are adopted.	Compliant																

Development Consent SSD 5109 (MOD2)						
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation
24	The Applicant must prepare and implement a Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with DRG, DPI, DoI – Water and Council; (b) be submitted to the Secretary for approval within 12 months of the date of this consent; (c) describe the short, medium and long term measures that would be implemented to: - manage remnant vegetation and habitat on site; - ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent; (d) include detailed performance and completion criteria for evaluating the performance of the rehabilitation of the site, including triggering remedial action (if necessary); (e) include a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for: - ensuring compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent; - enhancing the quality of remnant vegetation and fauna habitat; - establishing vegetation screening to minimise the visual impacts of the site on surrounding receivers; - restoring native endemic vegetation and fauna habitat within the rehabilitation area; - maximising the salvage of environmental resources within the approved disturbance area – including tree hollows, vegetative and soil resources – for beneficial reuse in the enhancement of the biodiversity areas or rehabilitation area; - collecting and propagating seed; - minimising the impacts on native fauna on site; - controlling weeds and feral pests; - controlling erosion; - controlling access; and - bushfire management;	Rehabilitation Management Plan 2019	A Rehabilitation Management Plan was prepared in September 2019. A copy is available on the Holcim Cooma Road Quarry website. The plan was submitted to DPIE on 10 September 2019 and largely addresses the requirements of the condition. A letter confirming consultation with DPI-Water is provided at Appendix 2 of the RMP. A note at section 2.2 of the RMP states that a copy of the report was provided to DRG, DPI, DoI-Water and Council. Also noted is that DPIE advised on 7 August 2019 that the update of the management plan could occur without the need to consult with nominated agencies in the Development Consent. Regarding requirement (e) the Rehabilitation Management Plan includes a rehabilitation strategy for the next three years being 2019 - 2021. As such the plan does not provide a strategy covering the audit period or future years.	Non-compliant	NC5	The Rehabilitation Management Plan is to be updated to reflect the next 3 year period.
25	Within 12 months of the approval of the Rehabilitation Management Plan, the Applicant must lodge a Rehabilitation Bond with the Department to ensure that the rehabilitation of the site is implemented in accordance with the performance and completion criteria set out in the Rehabilitation Management Plan.	Rehabilitation Management Plan 2019	Site interview with D Manning confirmed Holcim has an Rehabilitation Plan approved by DPIE 29/07/20. Rehabilitation Bond lodged and approved (DPIE letter 21/06/21)	Compliant		
26	Within 3 months of each Independent Environmental Audit (see condition 9 of schedule 5), the Applicant must review, and if necessary revise, the sum of the Rehabilitation Bond to the satisfaction of the Secretary. This review must consider the: a)effects of inflation; b)likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development); and c)performance of the implementation of the rehabilitation of the site to date.	Rehabilitation Management Plan 2020	No evidence of review following the July 2021 Independent Environmental Audit.	Non-compliant	NC6	Ensure management plans are reviewed post Independent Environmental Audits and incidents. Following reviews, correspondence to DPHI to be issued reviews confirming have occurred.
27	Within 12 months of the date of this consent, the Applicant must establish a vegetation screen to minimise visibility of site infrastructure from outside the development area. Following establishment, the Applicant must maintain the vegetation screen, to the satisfaction of the Secretary.	Site inspection	Vegetation Screen, sighted during site inspection.	Compliant		
28	The Applicant must implement all reasonable and feasible measures to minimise the off-site lighting impacts of the development.	Site inspection	Vegetation screen established. Lights are timer-controlled and directional. Minimal night-time operations	Compliant		
29	The Applicant must: 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 practicable if there is a fire in the surrounding area.	Site inspection Site specific induction discusses process to be followed in the event of a fire	Water cart equipped with hose for fire fighting Standpipe compatible with RFS is available on site	Compliant		
30	Prior to importing onto the site any recycled concrete or any other material that may be classified as a waste under the EPA Waste Classification Guidelines 2009 (or its latest version), the Applicant must obtain a ‘resource recovery exemption’ under the POEO Act and provide evidence of this exemption to the Department. <i>Note: This condition does not apply to routine deliveries to the site.</i>	Site Interviews (D Manning) Concrete waste records Resource recovery exemption	Concrete received as spadable (ie wet cement - not free flowing) and stockpiled on site. Concrete (non spadable) waste was not received or processed on site during the audit period.	Compliant		
31	The Applicant must: a)minimise the waste generated by the development; and b)ensure that the waste generated by the development is appropriately stored, handled, and disposed of, to the satisfaction of the Secretary.	Site inspection Waste management procedures	Waste is separate by waste stream and removed from site by licensed waste contractor. Waste oil and oil soaked filter are stored in a bunded designated area and collected by licenced contractor. The site is free of general litter and all waste types are stored in designated areas (ie oil waste, scrap metal and general waste). Bunded and waste hydrocarbon areas where well maintained. Minimal waste liquid identified within bunded areas.	Compliant		
<b>Schedule 4</b>						
1	As soon as practicable after obtaining monitoring results showing an: a)exceedance of any relevant criteria in Schedule 3, the Applicant must notify affected landowners in writing of the exceedance, and provide regular monitoring results to each affected landowner until the development is again complying with relevant criteria; and b)an exceedance of the relevant air quality criteria in schedule 3, the Applicant must send a copy of the NSW Health fact sheet entitled “Mine Dust and You” (as may be updated from time to time) to the affected landowners and/or existing tenants of the land.	Site Interviews (D Manning) Annual Review 2021, 2022 and 2023	Exceedances reported in Annual Reviews, did not result in impacts to neighbouring landholders.	Not triggered		

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CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation
2	<p>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. If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary decision the Applicant must:</p> <p>a)commission a suitably qualified, experienced and independent expert, whose appointment has been approved by the Secretary, to:</p> <ul style="list-style-type: none"><li>•consult with the landowner to determine his/her concerns;</li><li>•conduct monitoring to determine whether the development is complying with the relevant criteria in schedule 3; and</li><li>•if the development is not complying with these criteria, then identify the measures that could be implemented to ensure compliance with the relevant criteria; and</li></ul> <p>b)give the Secretary and landowner a copy of the independent review.</p>	<p>Site Interviews (D Manning)</p> <p>Annual Review 2021, 2022 and 2023</p>	<p>Holcim is not aware of any such request being made to the Secretary.</p> <p>Exceedances reported in Annual Reviews, did not result in impacts to neighbouring landholders.</p>	Not triggered		
<i>Schedule 5</i>						
Environmental Management						
1	<p>If the Secretary requires, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>a)be submitted to the Secretary for approval within 6 months of the Secretary requiring preparation of the strategy by notice to the Applicant;</p> <p>b)provide the strategic framework for the environmental management of the development;</p> <p>c)identify the statutory approvals that apply to the development;</p> <p>d)describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;</p> <p>e)describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"><li>•keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li><li>•receive, handle, respond to, and record complaints;</li><li>•resolve any disputes that may arise during the course of the development;</li><li>•respond to any non-compliance; and</li><li>•respond to emergencies; and</li></ul> <p>f)include:</p> <ul style="list-style-type: none"><li>•copies of any strategies, plans and programs approved under the conditions of this development consent; and</li><li>•a clear plan depicting all the monitoring required to be carried out under the conditions of this consent.</li></ul> <p>The Applicant must implement any Environmental Management Strategy as approved from time to time by the Secretary</p>	<p>Letter from DP&amp;E dated 08/10/14</p> <p>DPIE's consultation letter dated 07/08/2019.</p> <p>Environmental Management Strategy (March 2014)</p>	<p>Found to be compliant at last Audit.</p> <p>Review confirms Strategy generally addresses requirement of the condition.</p>	Compliant		
2	<p>The Applicant must 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"><li>•the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li><li>•any relevant limits or performance measures/criteria; and</li><li>•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;</li></ul> <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"><li>•impacts and environmental performance of the development; and</li><li>•effectiveness of any management measures (see (c) above);</li></ul> <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"><li>•incidents;</li><li>•complaints;</li><li>•Non Compliance with statutory requirements; and</li><li>•exceedances of the impact assessment criteria and/or performance criteria; and</li></ul> <p>h)a protocol for periodic review of the plan.</p> <p>i)a document control table that includes version numbers, dates when the management plan was prepared and reviewed, names and positions of people who prepared and reviewed the management plan, a description of any revisions made and the date of the Secretary's approval.</p> <p>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans</p>	<p>Transport Management Plan (September 2019) (TMP 2019)</p> <p>Noise Management Plan (September 2019) (NMP 2019)</p> <p>Blast Management Plan (September 2019) (BMP 2019)</p> <p>Air Quality Management Plan (September 2019) (AQMP 2019)</p> <p>Water Management Plan (July 2019) (WMP 2019)</p> <p>Heritage Management Plan (September 2019) (HMP 2019)</p> <p>Rehabilitation Management Plan (September 2019) (RMP 2019)</p> <p>Environmental Management Strategy (2014)</p>	<p>Management plans reviewed, those which are listed under the consent are available and demonstrate to general satisfy the requirements of the condition.</p>	Compliant		
3	<p>To ensure the strategies, plans or programs under this consent are updated on a regular basis, and that they incorporate any appropriate mitigation measures to improve the environmental performance of the development, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval. With the agreement of the Secretary, the Applicant may also submit any strategy, plan or program required by this consent on a staged basis.</p> <p>With the agreement of the Secretary, the Applicant may revise any strategy, plan or program approved under this consent without consulting with all the parties nominated under the applicable conditions of consent.</p>	<p>Site interviews</p> <p>Transport Management Plan (September 2019) (TMP 2019)</p> <p>Noise Management Plan (September 2019) (NMP 2019)</p> <p>Blast Management Plan (September 2019) (BMP 2019)</p> <p>Air Quality Management Plan (September 2019) (AQMP 2019)</p> <p>Water Management Plan (July 2019) (WMP 2019)</p> <p>Heritage Management Plan (September 2019) (HMP 2019)</p> <p>Rehabilitation Management Plan (September 2019) (RMP 2019)</p>	<p>Management plans reviewed as required by updates to operations or as required under the Consent. Sighted Department of Planning, Industry &amp; Environmental approval letter for Noise, Blast, Air Quality, Heritage &amp; Rehabilitation Management Plans dated 31/10/19 and Water Management Plan approval letter dated 12/08/19.</p>	Compliant		
4	<p>Within 3 months of the submission of an:</p> <p>a)incident report under condition 7 below;</p> <p>b)Annual Review under condition 9 below;</p> <p>c)audit report under condition 10 below; and</p> <p>d)any modifications to this consent,</p> <p>the Applicant must 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>	<p>Sighted examples of correspondence from Holcim to DPHI regarding management plan reviews (Holcim letter dated 30 June 2023)</p>	<p>Correspondence sighted confirm management plan reviews post Annual Returns.</p> <p>No evidence of reviews post incidents or audits.</p> <p>No modification occurred during the audit period.</p>	Non-compliant	NC7	As per NC6

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CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation
5	The Applicant must 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. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity: a)take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur; 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 c)implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.	Annual Review 2021, 2022 and 2023	A number of exceedances of criteria are noted within the annual reports, including a brief discussion on what caused the exceedance and if DPHI was notified. It is noted that 2023 Annual Review confirm an air quality exceedance occurring in October 2023 was note reported to DPHI.	Non-compliant	NC8	Ensure all exceedances and or incidents are report to DPHI. Inclusive of measures taken to stop and or prevent the exceedances from occurring in future, remediation options and adequately report the findings to DPHI. It is noted the exceedances noted in October 2023 related to the loss of a HVAS sample paper, not the exceedance of criteria.
6	The Applicant must establish and operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary. This CCC must be operated in general accordance with the Community Consultative Committee Guidelines: State Significant Projects (2019), and be operating within 6 months of the date of this consent. <i>Notes:</i> • <i>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</i> • <i>In accordance with the guideline, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council, recognised environmental groups and the local community.</i>	Annual Review 2021, 2022 and 2023 CCC Meeting minutes	The Cooma Road Quarry Community Consultative Committee (CCC) established in 2014. Meetings held 6 monthly and occurred on the following dates during the audit period; April 2021, July 2021, February 2022, 29 November 2022, April 2023 and August 2023. 2022 Meeting minutes are not available on the Holcim website, as such is not complaint with the requirements Community Consultative Committee Guidelines: State Significant Projects as updated.	Non-compliant	NC9	Upload the 2022 CCC meeting minutes to the Holcim website for community access.
Incident notification						
7	The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing to compliance@planning.nsw.gov.au and identify the development (including the development application number and name) and set out the location and nature of the incident.	Annual Review 2021, 2022 and 2023	A number of exceedances of criteria are noted within the annual reports, including a brief discussion on what caused the exceedance and if DPHI was notified. It is noted that 2023 Annual Review confirm an air quality exceedance occurring in October 2023 was note reported to DPHI.	Non-compliant	NC10	As per NC8
7A	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing to compliance@planning.nsw.gov.au and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. <i>Note: A non-compliance which has been notified as an incident does not need to also be notified as a noncompliance</i>	Annual Review 2021, 2022 and 2023	A number of exceedances of criteria are noted within the annual reports, including a brief discussion on what caused the exceedance and if DPHI was notified. It is noted that 2023 Annual Review confirm an air quality exceedance occurring in October 2023 was note reported to DPHI.	Non-compliant	NC11	As per NC8
Reporting						
8	The Applicant must 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.	Holcim website: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a>	All quarterly noise and truck movement data is available on the Holcim website. No blasting data is presented on the website for the audit period.	Non-compliant	NC12	Ensure all environmental performance data required to be reported under the Consent is made publicly available on the Holcim website in accordance with the Consent.
9	By the end of March each year, or other timing as may be agreed by the Secretary, the Applicant must submit a report to the Department reviewing the environmental performance of the development to the satisfaction of the Secretary. This review must: 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; 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: •the relevant statutory requirements, limits or performance measures/criteria; •requirements of any plan or program required under this consent; •the monitoring results of previous years; and •the relevant predictions in the documents listed in condition 2(a) of Schedule 2; c)identify any Non-Compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; d)identify any trends in the monitoring data over the life of the development; e)identify any discrepancies between the predicted and actual impacts of the development, and analyse the Potential cause of any significant discrepancies; and f)describe what measures will be implemented over the current calendar year to improve the environmental performance of the development. The Applicant must ensure that copies of the Annual Review are submitted to Council and are available to the Community	Annual Review 2021, 2022 and 2023	Sighted evidence of submission of Annual Reviews to DPHI, prior to end of March each year of the audit period. Annual Reviews are available on the Holcim website and CCC provided an updated regarding the Annual Reviews at 6-monthly meetings. No evidence provided of submission of the Annual Review to Council	Non-compliant	NC13	Ensure Annual Reviews are issued to Council.
Independent environmental audit						
10	Within a year of the date of this consent, and every 3 years thereafter, unless the Secretary directs otherwise, The Applicant must 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 Licence (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; (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals; and (f) be conducted and reported to the satisfaction of the Secretary.  <i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</i>	2021 Independent Environmental Audit Current audit is the 4th IEA	Previous audit period completed on the 31 December 2020, as such current audit period extends over the 3 year period. Being completed on 2 February 2024.	Non-compliant	NC14	Ensure IEA lead auditor engaged suficently prior to the end of the audit period in future.
11	Within 10 weeks of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report.	Noted.				

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CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <del>Compliant</del> / <del>Non-compliant</del> / Not triggered)	Unique Identification Non-compliance	Recommendation
11A	Any condition of this consent that requires the carrying out of monitoring or an environmental audit, whether directly or by way of a plan, strategy or program, is taken to be a condition requiring monitoring or an environmental audit under Division 9.4 of Part 9 of the EP&A Act. This includes conditions in respect of incident notification, reporting and response, non-compliance notification, compliance report and independent audit.  Note: For the purposes of this condition, as set out in the EP&A Act, “monitoring” is monitoring of the development to provide data on compliance with the consent or on the environmental impact of the development, and an “environmental audit” is a periodic or particular documented evaluation of the development to provide information on compliance with the consent or the environmental management or impact of the development.	Noted.				
12	By 30 September 2016, unless otherwise agreed by the Secretary, the Applicant must: a)make the following information publicly available on its website: •the documents listed in condition 2(a) 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; •any other matter required by the Secretary; and b)Keep this information up-to-date, to the satisfaction of the Secretary.	Holcim Cooma Road website: <a href="https://www.holcim.com.au/cooma-road">https://www.holcim.com.au/cooma-road</a> Annual Review 2021, 2022 and 2023	The SSD Consent Schedule 2 relates to Administrative Conditions. Condition 2(a) was changed as part of the 2016 Modification, however at the time of the determination in 2013, condition 2(a) referred to the EIS. The EIS is published on the Holcim Cooma Road Quarry website. Strategies, plans and programs (whether approved or otherwise) are available on the Holcim Cooma Road Quarry website. Noise monitoring assessment results are published for the period 2019-2023 on the website. Truck movement data results are published for the period 2016 - 2023 on the website. EPL and SSD consent are published on the website. EIS is published on the website. Annual Reviews are published for the period 2013 - 2022. Previous IEA reports forth period 2015-2021 are published on the website. Incident register (which appears to include complaints) is published on the website. Quarterly complaints for 2023 are published on the website. It is noted that the complaints register is not reflective of the complaints data in the Annual Review.	Non-compliant	NC15	Update complaints register on the Holcim website to accurately record complaints received.
Statement of commitments (EIS)						
1	The receipt and processing of clean excess concrete from approved suppliers for recycling as product. Proof of origin of the concrete and validation of recycled concrete material received (to confirm it is free of general waste materials, wood, paper and metals) will apply to the concrete recycling process. No demolition wastes, or similar, will be accepted.	Site Interview (D Manning) 'Cement Received' spreadsheet Holcim internal database software	Cement received by quarry is recorded in both the Cement Received Spreadsheet and the Holcim Internal Database Software. Auditor sighted both confirming which both tracking and inspection of cement consistent with the requirements of the condition.	Compliant		
2	Holcim Australia will visibly delineate the northern boundary of Lot 1 DP 808393 to identify the location of the adjacent Crown land road reserve	Site inspection	Sighted survey pegs of all Quarry boundaries.	Compliant		
3	No overburden associated with the Development will be placed within the previously approved overburden emplacement area to the west of the extraction area, identified as ‘Approved Disturbance Area – Overburden Emplacement’ on Figure 2.1 Cooma Road Quarry Existing Operations.	Site inspection	Overburden placed in designated area separate to the previously approved overburden emplacement area	Compliant		
4	The walls of all water management dams will be inspected biennially (every two years) for their structural integrity and for any maintenance requirements. The walls of the water management dams will be grassed and kept free of any trees and shrubs.	Site inspection	Water storage main dam wall is rock and cannot be vegetated. Side walls are sufficiently vegetated and show minimal signs of erosion.	Compliant		
5	All Holcim Australia employees and contractors accessing Cooma Road Quarry will be made aware of the presence of archaeological sites Cooma Quarry 1 and Cooma Quarry 2, and the need to avoid impacts on these sites.	Site Induction	Covered in Section 14. of Holcim’s Standard 2.3 Induction – Site Specific Safety Rules and conditions: Cooma Road Quarry Employee & Contractor Site Rules.	Compliant		
6	Cooma Quarry 2 will be fenced during the construction phase to avoid any unintended impacts to the site.	Site Interview (D Manning)	Task complete no longer relevant.	Not triggered		
7	Consultation with local Aboriginal community representatives will be undertaken to develop a culturally appropriate ongoing management strategy to avoid unintended impacts to Cooma Quarry 1 and Cooma Quarry 2	Aboriginal Heritage Management Plans	Management plans are complete and in place	Compliant		
8	An exclusion zone of at least 20 metres will be established around the Moses Morley’s Lime Kiln site and associated buildings during the construction of the Eastern Dam.	Site Interview (D Manning)	Site interviews confirmed fencing around the Moses Morley’s Lime Kiln site and associated buildings is in place and in good condition	Compliant		
9	The existing fence around the Moses Morley’s Lime Kiln site and associated buildings will be maintained and the opportunity for extending the fencing out to include the exclusion zone will be investigated.	Site Interview (D Manning)	Site interviews confirm maintenance activities carried out.	Compliant		
10	Vegetation within the existing fenced area of the Moses Morley’s Lime Kiln site will be managed to limit adverse impacts on the kiln site associated with vegetation growth.	Site Interview (D Manning)	Site interviews confirm maintenance activities carried out.	Compliant		
11	Holcim Australia will inspect the physical condition of the Moses Morley’s Lime Kiln site on a 6-monthly basis and compare the condition with the photographs contained in this report. The results of these inspections will be reported in the site’s Annual Review.	Site Interview (D Manning) Annual Review 2021, 2022 and 2023	Site interviews confirmed Kiln site is inspected 6-monthly, however this is not reported within the Annual Reviews.	Non-compliant	NC16	Formalise 6-monthly inspections of the Moses Morley’s Lime Kiln site are documented and outcomes are reported within the Annual Reviews.
12	Prior to any blasting or construction activities, photographic/archival recording of the Moses Morley’s Lime Kiln site will be undertaken in accordance with Heritage Branch, OEH guidelines Photographic Recording of Heritage Items Using Film or Digital Capture (2006). The photographic/archival record will be updated every five years until the cessation of quarrying activities	Previous audits	Previous audits confirm initial archival recording of the Moses Morley’s Lime Kiln site. No evidence provided of updates to the archival recording.	Non-compliant	NC17	Update the archival recording of the Moses Morley’s Lime Kiln site as per Consent.
13	Holcim Australia will make good/repair any damage to the Moses Morley Kiln site which occurs due to Cooma Road Quarry operations. Any repairs will be undertaken in a suitable manner using appropriate fabric and by an appropriately skilled heritage professional.	Site Interview (D Manning) Annual Review 2021, 2022 and 2023	Site interviews noted that no damage as result of quarrying operations has occurred at the Moses Morley’s Lime Kiln site. In addition the Annual Reviews do not identify any damage to the site.	Not triggered		
14	The existing dust control measures will continue to be implemented on site, including: •minimisations of the total disturbed/working areas at any one time; •dust collection during drilling operations; •enclosure of the primary and secondary crushing plants and screening transfer points; •watering of unsealed roads, working areas and stockpiles; •water sprays on the conveyors; •dust extraction system within the secondary crushing plant; and •truck wheel wash facility.	Air Quality Management Plan 2019 Site inspection Site interviews (D Manning)	Air Quality Management Plan 2019, Site inspection, Site interviews (D Manning) all confirm noted dust control measures are implemented on site.	Compliant		
15	As per Holcim’s Environmental Management Plan (Corkery 2008), deposited dust levels will be monitored at five sensitive receiver locations on a monthly basis	Air Quality Management Plan 2019 Annual Review 2021, 2022 and 2023 Site inspection Site interviews (D Manning)	Monthly monitoring data provided in Annual Review reports for audit period includes data for five monitoring locations (DDG1 – DDG5).	Compliant		
16	Holcim Australia will monitor diesel usage and seek opportunities for further efficiency, including consideration of fuel efficiency in equipment selection.	Site interviews (A Bertram)	Fuel usage is recorded in daily pre-start checks (checklist sighted) Fuel is tracked via an internal spreadsheet used for NPI reporting purposes. All Plant and Equipment is maintained to ensure good working order.	Compliant		

Development Consent SSD 5109 (MOD2)						
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <del>Compliant</del> / <del>Non-compliant</del> / Not triggered)	Unique Identification Non-compliance	Recommendation
17	Holcim Australia is committed to managing the noise impact of the Development and will implement the following controls: •the attenuation of the primary crushing plant from a sound power level of 120 dB(A) to approximately 112 dB(A); •the management of loaders and road haulage trucks to minimise the number of machines running in exposed locations at any one point in time; •the management of the layout of the stockpiles and work areas to minimise the number of machines running in exposed locations; •the management of stockpiles to act as barriers between working machines and potential receiver areas (applicable to potential exposed areas higher within the quarry and product area); •not running the secondary crushing plant during the evenings (between 6.00 pm and 10.00 pm) if potentially adverse weather conditions aid in the propagation of noise to the receiver areas; and •the construction of an earth-berm situated along the eastern extent of the proposed infrastructure area.	Noise Management Plan (September 2019) Annual Reviews for 2021, 2022 and 2023 Site interviews	The Noise Management Plan (2019) describes best management practice to minimise the construction, operational and traffic noise.  Section 5.3.3 Sound Power Level Maintenance Testing section of the NMP 2019 states that a Sound Power Level (SWL) testing program will be implemented to ensure compliance with the sound power levels for equipment outlined in the EIS.  In addition to regular maintenance of plant and equipment to ensure effective controls are maintained, a Sound Power Audit was undertaken by Muller Acoustic Consulting in December 2018. As confirmed by Site Interviews with David Manning, no new equipment has been purchased since this time. Equipment is maintained as per OEM specifications.  Quarterly noise monitoring of operations is undertaken. Reported in 2021, 2022 and 2023 Annual reviews. At the time of audit the Q1 2024 noise monitoring report was not available.	Compliant		
18	Built elements of the new infrastructure area will be sympathetically coloured to blend into the environment, where feasible (eg use of green and brown tones).	Site inspection Site interviews (D Manning)	Newly constructed facilities are green and brown tones.	Compliant		
19	Holcim Australia will store all dangerous goods in accordance with dangerous goods storage requirements and relevant Australian Standards.	Site inspection Site interviews (D Manning)	Dangerous goods are stored in dedicated areas within the locked bunded dangerous goods area and managed as per Safety Data Sheets available on the Holcim website.	Compliant		
20	Holcim Australia will continue to implement the appropriate measures to reduce the risk of fire ignition and the spread of bushfire across the site in consultation with the RFS.	Site inspection Site interviews (D Manning)	Refer to Schedule 3, Condition 29	Compliant		
21	All waste materials removed from the site shall only be directed to a waste management facility or premises lawfully permitted to accept the materials.	Site inspection Site interviews (D Manning)	All waste removed from site via licensed waste contractor or Council to licensed facility. Sighted dockets and tracking information.	Compliant		

EPL 1453 - Crushing, grinding separating; extractive industries; Resource recovery																																						
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <span>Compliant</span> / <span>Non-compliant</span> / Not triggered)	Unique Identification Non-compliance																																	
Administrative Conditions																																						
A1.1	<p>The 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 the licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.</p> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Crushing, grinding or separating</td><td>Crushing, grinding or separating</td><td>&gt; 500000 - 2000000 T annual processing capacity</td></tr><tr><td>Extractive activities</td><td>Extractive activities</td><td>&gt; 500000 - 2000000 T annually extracted or processed</td></tr><tr><td>Resource recovery</td><td>Recovery of general waste</td><td>Any general waste recovered</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Crushing, grinding or separating	Crushing, grinding or separating	> 500000 - 2000000 T annual processing capacity	Extractive activities	Extractive activities	> 500000 - 2000000 T annually extracted or processed	Resource recovery	Recovery of general waste	Any general waste recovered	<p>Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report.</p>	<p>2023 = 1,042,190 t 2022 = 899,442 t 2021 = 1,066,32 t</p>	Compliant																						
Scheduled Activity	Fee Based Activity	Scale																																				
Crushing, grinding or separating	Crushing, grinding or separating	> 500000 - 2000000 T annual processing capacity																																				
Extractive activities	Extractive activities	> 500000 - 2000000 T annually extracted or processed																																				
Resource recovery	Recovery of general waste	Any general waste recovered																																				
A1.2	<p>Notwithstanding the fee scales noted above, the licensee must not:</p> <p>(a) produce more than 1.5 million tonnes of quarry products from the premises per calendar year; and</p> <p>(b) transport more than 1.5 million tonnes of quarry products, ENM or VENM to or from the premises per calendar year following the commissioning of Stage 1 of the Old Cooma Road re-alignment.</p> <p>Note: This condition has been added to be consistent with consolidated consent SSD-5109 (Cooma Road Quarry Continued Operations Project).</p>	<p>Previous 2021 Independent Audits. Site interviews Transport records Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report.</p>	<p>Stage 1 of the Old Cooma Road Realignment has been completed, being opened in July 2020 . As such outside of the audit period, the condition is now redundant. Total truck movements and tonnages reported on Holcim website confirm no more the 1.5 Million tonnes transported in calendar year.</p>	Compliant																																		
A2.1	<p>A2 Premises or plant to which the licence applies:</p> <p>Premises Details: COOMA ROAD QUARRY, COOMA ROAD, QUEANBEYAN NSW 2620 LOT 103 DP 754881, LOT 110 DP 754881, LOT 111 DP 754881, LOT 124 DP 754881, LOT 1 DP 808393 AND CROWN ROAD ADJACENT TO LOT 1 DP808393</p>	<p>Site interviews Site inspection</p>	<p>Operations carried on land consent with EPL</p>	Compliant																																		
A3.1	<p>A3 Information supplied to the EPA:</p> <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 the licence. In this condition the reference to "the licence application" includes a reference to:</p> <p>a)the applications for any licences (including former pollution control approvals) which the licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and</p> <p>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>	<p>Site interviews Site inspection</p>	<p>Operations appear to be undertaken generally in accordance with approved activities under SSD 5109 and EPL 1453</p>	Compliant																																		
Discharges to Air and Water and Applications to Land																																						
P1.1	<p>P1 Location of monitoring/discharge points and areas:</p> <p>The following points referred to in the table are identified in the licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to air from the point.</p> <table><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>2</td><td>PM10 Dust Monitoring</td><td></td><td>The dust monitor is labelled "PM10" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr><tr><td>8</td><td>Dust Monitoring</td><td></td><td>The dust deposition gauges as labelled "dg1" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr><tr><td>9</td><td>Dust monitoring</td><td></td><td>The dust deposition gauge as labelled "dg2" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr><tr><td>10</td><td>Dust Monitoring</td><td></td><td>The dust deposition gauge as labelled "dg3" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr><tr><td>11</td><td>Dust Monitoring</td><td></td><td>The dust deposition gauge as labelled "dg4" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr><tr><td>12</td><td>Dust Monitoring</td><td></td><td>The dust gauge as labelled "dg5" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr><tr><td>13</td><td>Air blast overpressure &amp; ground vibration peak particle velocity monitoring</td><td></td><td>Blast monitoring point as labelled "TBC" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr></table>	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	2	PM10 Dust Monitoring		The dust monitor is labelled "PM10" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	8	Dust Monitoring		The dust deposition gauges as labelled "dg1" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	9	Dust monitoring		The dust deposition gauge as labelled "dg2" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	10	Dust Monitoring		The dust deposition gauge as labelled "dg3" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	11	Dust Monitoring		The dust deposition gauge as labelled "dg4" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	12	Dust Monitoring		The dust gauge as labelled "dg5" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	13	Air blast overpressure & ground vibration peak particle velocity monitoring		Blast monitoring point as labelled "TBC" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	<p>Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))). 2021 - PM10 and DDG1-5 monitored (Cooma road annual review 2021). 2022 - PM10 and DDG1-5 monitored (Cooma road annual review 2022). 2022 - PM10 and DDG1-5 monitored (Cooma road annual review 2022). 2023 - PM10 and DDG1-5 monitored (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).</p>	<p>Monitoring undertaken included: 2021 - PM10 and DDG1-5 monitored (Cooma road annual review 2021). 2022 - PM10 and DDG1-5 monitored (Cooma road annual review 2022). 2023 - PM10 and DDG1-5 monitored (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))) Noted non-compliances: 2021: The July 2021 result could not be retrieved from DDG4 due to the funnel being missing from this gauge when sampling was attempted. This was suspected to be the result of vandalism. Therefore, the annual DDG4 average is calculated from less than 12 sampling months. 2022: Two DDG samples were missed in April (one lost filter and one invalidated sample). 2023: DDG4 April 2023 result exceeded assessment criteria. October 2023 a filter paper of EPA Identification 2 was lost</p>	Non-compliant	NC18	<p>Exceedances of criteria have been investigated and associated actions closed as reported in Annual Returns. Site interviews demonstrated the Holcim staff are aware of compliance conditions and appropriate actions to minimise potential exceedance (i.e. modifying operations) no further actions are recommended.</p>
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																																			
2	PM10 Dust Monitoring		The dust monitor is labelled "PM10" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).																																			
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13	Air blast overpressure & ground vibration peak particle velocity monitoring		Blast monitoring point as labelled "TBC" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).																																			
P1.2	<p>The following utilisation areas referred to in the table below are identified in the licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.</p>	-	-	Noted																																		
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> <p><b>Water and land</b></p> <table><tr><th>EPA Identification no.</th><th>Type of Monitoring Point</th><th>Type of Discharge Point</th><th>Location Description</th></tr><tr><td>1</td><td>Discharge to waters Discharge quality monitoring Volume monitoring</td><td>Discharge to waters Discharge quality monitoring Volume monitoring</td><td>Outlet from sediment interception pond to Barracks Creek labelled as "SIP Dam Sample Point" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).</td></tr></table>	EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Discharge to waters Discharge quality monitoring Volume monitoring	Discharge to waters Discharge quality monitoring Volume monitoring	Outlet from sediment interception pond to Barracks Creek labelled as "SIP Dam Sample Point" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).	<p>Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).</p>	<p>2022 - Monitoring occurred in Barracks Creek but there were no discharge events in 2021 (Cooma road annual review 2021). 2022 - Monitoring occurred in Barracks Creek but there were no discharge events in 2022 (Cooma road annual review 2022). 2023 - Monitoring occurred in Barracks Creek but were there discharge events in 2023 (Cooma road annual review 2022)</p>	Compliant																										
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																																			
1	Discharge to waters Discharge quality monitoring Volume monitoring	Discharge to waters Discharge quality monitoring Volume monitoring	Outlet from sediment interception pond to Barracks Creek labelled as "SIP Dam Sample Point" on map titled "Cooma Road Quarry Monitoring Locations Map" provided to the EPA on 16 July 2020 (DOC20/568222-1).																																			
Limit Conditions																																						
L1.1	<p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the <i>Protection of the Environment Operations Act 1997</i> .</p>	<p>Annual Review, 2021, 2022, 2023 2023 Quarterly Monitoring Reports Site inspection Site interviews - D Manning</p>	<p>No reportable incidents under the POEO Act reported in Annual Reviews or noted by site during interviews.</p>	Compliant																																		

EPL 1453 - Crushing, grinding separating; extractive industries; Resource recovery																														
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <span>Compliant</span> / <span>Non-compliant</span> / Not triggered)	Unique Identification Non-compliance	Recommendation																								
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.	Annual Review, 2021, 2022, 2023	Water monitoring results provided in Section 7 - Water Management in the Annual Reports. As there has been no discharge from site since 2010, water monitoring sampling and results reported in Annual Review are from within the creek (ie not at discharge point as no discharge). Recommendation:	Compliant																										
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Annual Review, 2021, 2022, 2023	Water monitoring results provided in Section 7 - Water Management in the Annual Reports. As there has been no discharge from site since 2010, water monitoring sampling and results reported in Annual Review are from within the creek (ie not at discharge point as no discharge). Recommendation: Investigate with EPA if instream monitoring is required if there is no discharge from site.	Compliant																										
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the tables.	Note.																												
L2.4	Water and/or Land Concentration Limits  <div>POINT 1<table><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><tr><td>Oil and Grease</td><td>milligrams per litre</td><td></td><td></td><td></td><td>10</td></tr><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></table></div>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	Oil and Grease	milligrams per litre				10	pH	pH				6.5-8.5	Total suspended solids	milligrams per litre				50	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	The following details of exceedances relate to Barrack Creek monitoring point not the discharge point, as no discharge has occurred from the Site during the audit period. As such no exceedance has occurred. Noting the Barrack Creek results are reported within the Annual Review they are reported below for context.  2022 - Monitoring occurred in Barracks Creek but there were no discharge events in 2021 (Cooma road annual review 2021). Average rates from annual monitoring complied with the criteria (36.95 mg/l (TSS); 8.26 pH; and 8.25 mg/l (Oil/Grease). There were monthly exceedance of TSS in 2 months (June / Dec); pH in 2 months (March / Nov) and Oil / Grease in 4 months (June, Aug, Sept and Oct).  2022 - Monitoring occurred in Barracks Creek but there were no discharge events in 2022 (Cooma road annual review 2022). Average rates from annual monitoring complied with the criteria (30.25 mg/l (TSS); 8.4 pH; and 7.5 mg/l (Oil/Grease). There were monthly exceedance of TSS in 2 months (Aug / Oct); pH in 3 months (May/ Sept / Dec) and Oil / Grease in 2 months (May / Dec).  2023- Monitoring occurred in Barracks Creek but there were no discharge (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))). Average rates from annual monitoring complied with the criteria (7.74 mg/l (TSS). However average rates for pH were 8.9; and 14.66mg/l for Oil/Grease which exceed criteria). There were no monthly exceedance of TSS. However pH exceeded in 8 months and Oil / Grease in 5 months.	Compliant		
Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																									
Oil and Grease	milligrams per litre				10																									
pH	pH				6.5-8.5																									
Total suspended solids	milligrams per litre				50																									
L3.1	Waste: 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. <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><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 92 of the Protection of the Environment Operations (Waste) Regulation 2014</td><td>As specified in each particular resource recovery exemption</td><td></td></tr><tr><td>NA</td><td>Concrete</td><td>Imported recycled concrete used for processing.</td><td>Resource recovery</td><td>10,000 tonnes per annum</td></tr></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 92 of the Protection of the Environment Operations (Waste) Regulation 2014	As specified in each particular resource recovery exemption		NA	Concrete	Imported recycled concrete used for processing.	Resource recovery	10,000 tonnes per annum	Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report.	Concrete waste the only waste imported to site during the audit period. Tonnages are reported below: 2023 = 7,400 t 2022 = 3,491.77 t 2021 = 3,491.8 t	Compliant											
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 92 of the Protection of the Environment Operations (Waste) Regulation 2014	As specified in each particular resource recovery exemption																											
NA	Concrete	Imported recycled concrete used for processing.	Resource recovery	10,000 tonnes per annum																										
L3.2	Concrete waste must be stockpiled on site in bunded areas and can be processed and blended with quarry raw product to produce quarry product(s).	Site inspection Site interviews - D Manning	Cement stockpiled in designated disturbed and bunded area.	Compliant																										
L3.3	The licensee must not: •Process more than 10,000 tonnes of concrete waste per annum; •Store more than 10,000 tonnes of concrete waste on the premises at any one time.	Annual Review, 2021, 2022, 2023 Sighted 2023 monthly tonnages report. Site interviews - D Manning	Concrete waste the only waste imported to site during the audit period. Tonnages are reported below: 2023 = 7,400 t 2022 = 3,491.77 t 2021 = 3,491.8 t Site interviews confirmed that waste is managed as no more then 10,000t is held on site	Compliant																										
L4.1	Noise Limits: <table><tr><th>Receiver</th><th>Day Shoulder 6 - 7 am (LAeq(15 min))</th><th>Day 7 am - 6 pm (LAeq (15 min))</th><th>Evening 6 - 10 pm (LAeq (15 min))</th></tr><tr><td>N1, N7, N8, N56, N57, N59, N63, N64, N65</td><td>40</td><td>44</td><td>39</td></tr><tr><td>N67</td><td>36</td><td>41</td><td>35</td></tr><tr><td>All other receivers between N9 and N71 inclusive</td><td>36</td><td>38</td><td>35</td></tr><tr><td>All other receivers</td><td>35</td><td>35</td><td>35</td></tr></table> Note: The above locations refer to the respective noise assessment locations detailed in Appendix 5 of the Consolidated Consent - SSD 5109 (DOC19/541449).  Note: The meteorological factors presented in Fact Sheet D of the NSW EPA Noise Policy for Industry 2017 shall also be applied to the measured noise level where applicable.	Receiver	Day Shoulder 6 - 7 am (LAeq(15 min))	Day 7 am - 6 pm (LAeq (15 min))	Evening 6 - 10 pm (LAeq (15 min))	N1, N7, N8, N56, N57, N59, N63, N64, N65	40	44	39	N67	36	41	35	All other receivers between N9 and N71 inclusive	36	38	35	All other receivers	35	35	35	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	2022 - no noise exceedances (Cooma road annual review 2021). 2022 - no noise exceedance due to the quarry (Cooma road annual review 2022). 2023 - no noise exceedance due to the quarry (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	Compliant						
Receiver	Day Shoulder 6 - 7 am (LAeq(15 min))	Day 7 am - 6 pm (LAeq (15 min))	Evening 6 - 10 pm (LAeq (15 min))																											
N1, N7, N8, N56, N57, N59, N63, N64, N65	40	44	39																											
N67	36	41	35																											
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	EPL 1453 - Crushing, grinding separating; extractive industries; Resource recovery					
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <span>Compliant</span> / <span>Non-compliant</span> / Not triggered)	Unique Identification Non-compliance	Recommendation
L5.1	Blasting: The air blast overpressure level from blasting operations in or on the premises must not exceed: a)115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; and b)120 dB (Lin Peak) at any time. At any point within 1 metre of any affected residential boundary or other noise sensitive location such as a school or hospital.	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	2021 - compliant - no exceedances (Cooma road annual review 2021). 2022 - compliant - no exceedances (Cooma road annual review 2022). 2023 - compliant - no exceedances (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	Compliant		
L5.2	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: a)5 mm/s for more than 5% of the total number of blasts carried out on the premises during each reporting period; and b)10mm/s at any time. At any point within 1 metre of any affected residential boundary or other noise sensitive location such as a school or hospital.	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	2022 - compliant - no exceedances (Cooma road annual review 2021). 2022- compliant - no exceedances (Cooma road annual review 2022). 2023 - compliant - no exceedances (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	Compliant		
L5.3	To determine compliance with condition(s) L3.1 and L3.2: a)air blast overpressure and ground vibration levels must be measured at the "New Blast Monitor" location as shown on the map titled "Cooma Road Quarry Resource Definition Work Program" dated 12 August 2004 for all blasts carried out in or on the premises; and b)instrumentation used to measure the air blast overpressure and ground vibration levels must meet the requirements of Australian Standard 2187.2 of 1993.	Blast Management Plan (2019)	Blast management plan defines standards required to be satisfied and location of blast monitoring location, which was sighted during audit. No evidence provided that blast monitoring occurs in accordance with Australian Standard 2187.2 of 1993.	Non-compliant	NC19	Ensure blast monitoring occurs in accordance with Australian Standard 2187.2 of 193 (as updated) and provide assurance with Annual Reviews.
L5.4	Blasting operations at the premises may only take place between 9:00am-3:00pm Monday to Friday. Blasting is not permitted on weekends or public holidays	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	2022 - Cooma Road Quarry 2021 Annual Review - 100% compliance with blasting days / time 2022 - Cooma Road Quarry 2022 Annual Review - 100% compliance with blasting days / time 2023 - Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023)) - 100% compliance with blasting days / time	Compliant		
L6.1	Hours of Operation: Standard construction hours Unless otherwise specified by any other condition of this licence, all construction activities are: a) restricted to between the hours of 7:00am and 6:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays	Annual Review, 2021, 2022, 2023	2022 - compliant (Cooma road annual review 2021). 2022- compliant (Cooma road annual review 2022). 2023- compliant (Cooma road annual review 2023).	Compliant		
L6.2	Operating Hours Unless otherwise specified by any other condition of this licence, operating hours are restricted to: a) Primary crushing, laden truck movements between the hours of 6:00am and 6:00pm Monday to Saturday; b) Unladen truck movements between the hours of 6:00am and 8:00pm Monday to Saturday; c) Other operations between the hours of 6:00am and 10:00pm Monday to Saturday; and d) No activities to be undertaken on Sundays and Public Holidays.	Annual Review, 2021, 2022, 2023	2022 - compliant (Cooma road annual review 2021). 2022- compliant (Cooma road annual review 2022). 2023- compliant (Cooma road annual review 2023).	Compliant		
Operating Conditions						
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.	Site inspection Site interviews - D Manning	Site Inspection showed environmental controls in place such as designated hardstand areas, purpose built wash down area where all runoff is collected and disposed of by licenced contractor. Designated areas for waste disposal, bunded areas for waste oil and chemical storage cabinets used. Site drainage exists to contain all water onsite with not offsite discharges. Site interviews with D Manning show an understanding of consents and licences and appropriate site management	Compliant		
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.	Sighted maintenance work orders Prestart checklists Site interviews Site Inspection	SAP system notifies for Fixed plant maintenance - generates WO to be completed Morning pre-start checks are completed by operators (sighted) to record running hours and general checks such as oil leaks. Supervisors enter run hours into spreadsheet which then triggers maintenance required based on run hours.	Compliant		
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Air Quality Management Plan 2019 Sight inspection Site interviews	Air Quality Management Plan defines management measures to minimise and prevent dust emissions. Water cart observed onsite and being utilised during audit. Dust stockpiles are sprayed to create a 'crust' which contains dust from stockpiled material. Disturbance minimised as far as practicable to reduce emission source.	Compliant		
O4.1	The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment. The PIRMP must be tested at least annually or following a pollution incident. The licensee must develop the Pollution Incident Response Management Plan in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations.	PIRMP Site interviews - D Manning	PIRMP Sighted - last updated September 2020 Interview identified yearly Training/PIRMP testing undertaken - different incident scenario conducted each year.	Compliant		
O5.1	All liquid chemicals, fuels and oils must be stored in tanks or containers inside suitable bund(s). Bunds are to be designed, constructed and maintained in accordance with AS1940-2004 Storage and Handling of Flammable and Combustible Liquids.	Site Inspection	Site inspection of designated areas for waste disposal (oily waste & scrap metal). Oily waste areas were bunded and stored in tanks and drums clearly marked as oily waste. Chemical storage cabinets used and located within a locked shed. The shed was also bunded and ventilated to ensure any spilt chemicals are fully contained and managed.	Compliant		
O6.1	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.	PIRMP Site interviews - D Manning	Staff aware of environmental obligations and site is managed to ensure all site controls are maintained	Compliant		
Monitoring and Recording Conditions						

EPL 1453 - Crushing, grinding separating; extractive industries; Resource recovery																						
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation																
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.	Annual Reviews Holcim website	Annual Reviews containing monitoring data available on Holcim Cooma Road Quarry website dating back to 2013 https://www.holcim.com.au/about-us/community-link/cooma-road/planning-approvals	Compliant																		
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.	(Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023)	Spreadsheet is inclusive of data required of condition, excluding name of individual who took sample. The name of the individual is recorded within the Chain of Custody data sheets as appropriate.	Compliant																		
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:	Air Quality Management Plan (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023)	Air Quality Management Plan defines sampling methodology. Monitoring undertaken defined in Monitoring Worksheet.	Compliant																		
M2.2	Air Monitoring Requirements <b>POINT 2</b> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>PM10</td><td>micrograms per cubic metre</td><td>Continuous</td><td>AM-18</td></tr></table> <b>POINT 8,9,10,11,12</b> <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>Particulates - Deposited Matter</td><td>grams per square metre per month</td><td>Monthly</td><td>AM-19</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	AM-18	Pollutant	Units of measure	Frequency	Sampling Method	Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	2022 - PM10 and DDG1-5 monitored (Cooma road annual review 2021). 2022 - PM10 and DDG1-5 monitored (Cooma road annual review 2022). 2023 - PM10 and DDG1-5 monitored (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	Compliant		
Pollutant	Units of measure	Frequency	Sampling Method																			
PM10	micrograms per cubic metre	Continuous	AM-18																			
Pollutant	Units of measure	Frequency	Sampling Method																			
Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19																			
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 prior to the testing taking place. Note: 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".	Air Quality Management Plan (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023)	Air Quality Management Plan defines sampling methodology. Monitoring undertaken defined in Monitoring Worksheet.	Compliant																		
M4.1	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.	Holcim Cooma Road website: https://www.holcim.com.au/cooma-road Annual Review 2021, 2022 and 2023	EIS is published on the website. Annual Reviews are published for the period 2013 - 2022. Incident register (which appears to include complaints) is published on the website. Quarterly complaints for 2023 are published on the website. It is noted that the complaints register is not reflective of the complaints data in the Annual Review.	Non-compliant	NC20	As per NC13																
M4.2	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.	Site interview Holcim Complaints / Incidents database	Complaints/incidents register sighted for the reporting period. All incidents are logged with date, time, 'event type', Workgroup & Description of event. Events are given a reference number which can be reviewed to see details of outcomes and actions required.	Compliant																		
M4.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	The Holcim Community Complaint Register	The Holcim Community Complaint Register maintains records for Cooma Road Quarry from 2012 to present (inclusive)	Compliant																		
M4.4	The record must be produced to any authorised officer of the EPA who asks to see them.	Noted.																				
M5.1	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.	Holcim Cooma Road website: https://www.holcim.com.au/cooma-road	The Cooma Road Website has a phone Number on it: https://www.holcim.com.au/cooma-road Community Enquiries Phone 0437 427 607 However it is not referenced as Community Complaints line for ease of reference.	Non-compliant	NC21	Holcim to display a number on their website that is easily identifiable as a number for the public to register complaints associated with Holcim's activities																

	EPL 1453 - Crushing, grinding separating; extractive industries; Resource recovery					
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <span>compliant</span> / <span>Non-compliant</span> / Not triggered)	Unique Identification Non-compliance	Recommendation
M5.2	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.	Holcim Cooma Road website: https://www.holcim.com.au/cooma-road	The Cooma Road Website has a phone Number on it: https://www.holcim.com.au/cooma-road Community Enquiries Phone 0437 427 607 However it is not referenced as Community Complaints line for ease of reference.	Non-compliant	NC22	As per NC21
M5.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence	Holcim Cooma Road website: https://www.holcim.com.au/cooma-road	The Cooma Road Website has a phone Number on it: https://www.holcim.com.au/cooma-road Community Enquiries Phone 0437 427 607 However it is not referenced as Community Complaints line for ease of reference.	Non-compliant	NC23	As per NC21
	Reporting Conditions					
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	EPA Annual Returns 21, 22 and 22	EPA Annual Returns submitted and available on Public Register. Annual Returns for the Aduti period include: A complete EPA Annual Return From: 1-5-2022 To: 30-4-2023 - submitted on the 28 June 2023 A complete EPA Annual Return From: 1-5-2021To: 30-4-2022 - submitted on the 28 June 2022. A complete EPA Annual Return From: 1-5-2020 To: 30-4-2021 - submitted on the 28 June 2022.	Compliant		
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	EPA Annual Returns 21, 22 and 22	EPA Annual Returns submitted and available on Public Register. Annual Returns for the Aduti period include: A complete EPA Annual Return From: 1-5-2022 To: 30-4-2023 - submitted on the 28 June 2023 A complete EPA Annual Return From: 1-5-2021To: 30-4-2022 - submitted on the 28 June 2022. A complete EPA Annual Return From: 1-5-2020 To: 30-4-2021 - submitted on the 28 June 2022.	Compliant		
R1.3	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.	Site interview		Not triggered		
R1.4	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.	Site interview		Not triggered		
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or 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').	EPA Annual Returns 21, 22 and 22	EPA Annual Returns submitted and available on Public Register. Annual Returns for the Aduti period include: A complete EPA Annual Return From: 1-5-2022 To: 30-4-2023 - submitted on the 28 June 2023 A complete EPA Annual Return From: 1-5-2021To: 30-4-2022 - submitted on the 28 June 2022. A complete EPA Annual Return From: 1-5-2020 To: 30-4-2021 - submitted on the 28 June 2022.	Compliant		
R1.6	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.	EPA Annual Returns 20, 21, 22 and 22	EPA Annual Returns 20, 21, 22 and 22 available on site and sight on Holcim system during audit.	Compliant		
R1.7	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.	EPA Annual Returns 21, 22 and 22		Compliant		
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Noted.				
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. 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.	Incident Register Annual Review 2021, 2022 and 2023	No events during audit period reported to the EPA, with incidents largely relating to Air Quality criteria exceedances in which the EPL does not stipulate criteria. With the exception of an exceedance of criteria, as per the Air Quality Management Plan at DDG4 in April 2023, however as reported in the 2023 Annual Review site did not contribute to the exceedance.	Compliant		
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or 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.	Site interview	No requests made during audit period	Not triggered		
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.	Site interview	No requests made during audit period	Not triggered		

	EPL 1453 - Crushing, grinding separating; extractive industries; Resource recovery					
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <span>compliant</span> / <span>Non-compliant</span> / Not triggered)	Unique Identification Non-compliance	Recommendation
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; 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; 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; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Site interview	No requests made during audit period	Not triggered		
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.	Noted.				
R4.1	The licensee must report any exceedance of the licence blasting limits to the regional office of the EPA as soon as practicable, but no later than 48 hours, after the exceedance becomes known to the licensee or to one of the licensee’s employees or agents.	Annual Review, 2021, 2022, 2023 (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	2022 - compliant - no exceedances (Cooma road annual review 2021). 2022 - compliant - no exceedances (Cooma road annual review 2022). 2023 - compliant - no exceedances (Cooma Road (EPL 1453 Live Monitoring Worksheet (2021-2023))).	Compliant		
	General Conditions					
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Site Inspection	Copy of Licence kept in site office	Compliant		
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted				
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Site Inspection	Copy of Licence kept in site office and available to all staff	Compliant		

Water supply works approval: 40WA413082 (Work Type: Pump (80mm Centrifugal Pump) and Bywash Dam Lot 21, DP 1180981						
	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation
	Take of Water					
1	Any water supply work authorised by this approval must take water in compliance with the conditions of the access licence under which water is being taken	Water Access Licence WAL33412 sighted		Compliant		
	Water Management Works					
2	When a water supply work authorised by this approval is to be abandoned or replaced, the approval holder must contact the relevant licensor in writing to verify whether the work must be decommissioned. The work is to be decommissioned unless the approval holder receives notice from the Minister not to do so. Within sixty days of decommissioning, the approval holder must notify the relevant licensor in writing that the work has been decommissioned.	Noted				
	Monitoring and Recording					
3	Where a water meter is installed on a water supply work authorised by this approval, the meter reading must be recorded in the logbook before taking water. This reading must be recorded every time water is to be taken.	NSW Aggregates Water Report 2021, 2022, 2023	NSW Water Aggregates Report usage spreadsheets record end of month meter readings and monthly waster usage totals for each water usage and captured via Holcim SAP database. It is noted that due to significant rainfall during the audit period no water was required to be sourced under the water supply work and associated WAL during 2023. Water captured within the voids was relied upon.	Compliant		
4	Before water is taken through the water supply work authorised by this approval, confirmation must be recorded in the logbook that cease to take conditions do not apply and water may be taken. The method of confirming that water may be taken, such as visual inspection, internet search, must also be recorded in the logbook. If water may be taken, the: A. date, and B. time of the confirmation, and C. flow rate or water level at the reference point in the water source must be recorded in the logbook.	NSW Aggregates Water Report 2021, 2022, 2023 Site inspection Site interview (D Manning)	80mm pump located at bywash dam Discussion with Quarry manager indicated that daily inspections of bywash dam are undertaken to ensure sufficient water levels are maintained (inspection sheets sighted). Flow rates are not recorded as dam is supplied by rainwater only - not linked to a stream. Unused water from processing is returned to bywash dam for re-use. It is noted that due to significant rainfall during the audit period no water was required to be sourced under the water supply work and associated WAL during 2023. Water captured within the voids was relied upon.	Compliant		
5	The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planning and harvesting, must be recorded in the logbook each time water is taken	NSW Aggregates Water Report 2021, 2022, 2023	Spreadsheets show water usage types with monthly total of meter readings & monthly usage amounts for Standpipe usage, Plant usage and Water cart usage where applicable	Compliant		
6	A logbook must be kept, unless the work is metered and fitted with a data logger. The logbook must be produced for inspection when requested by the relevant licensor.	NSW Aggregates Water Report 2021, 2022, 2023	Water meter installed and monthly meter readings captured along with monthly and yearly water usage totals.	Compliant		
7	The completed logbook must be retained for five (5) years from the last date recorded in the logbook	NSW Aggregates Water Report 2021, 2022, 2023 Water usage and Rainfall spreadsheet data (holds data prior to 2021)	5 years of spreadsheets sighted	Compliant		
8	The following information must be recorded in the logbook for each period of time that water is taken: a)date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and b)the access licence number under which the water is taken, and c)the approval number under which the water is taken, and d)the volume of water taken for domestic consumption and/or stock watering.	NSW Aggregates Water Report 2021, 2022, 2023	Water meter installed and monthly meter readings captured along with monthly and yearly water usage totals. Spreadsheets show water usage types - Standpipe usage, Plant usage and Water cart usage where applicable	Compliant		
	Reporting					
9	Once the approval holder becomes aware of a breach of any condition on this approval, the approval holder must notify the minister as soon as practicable. the minister must be notified by: A.email: water.enquiries@dpi.nsw.gov.au, or B. telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call	Site interview (D Manning)	No incidents relating to Water Supply works during the audit period	Compliant		
	Other Conditions					
10	The approval holder must make all reasonable efforts not to allow any used water to discharge, by any means including surface or subsurface drains or pipes, into or onto: - any adjoining public or crown road; - any other person's land; - any Crown land; <del>- any river, creek or watercourse or aquifer</del>	Site interview (D Manning)	All water is contained within the Bywash dam. Water levels are maintained between the onsite dams to ensure water levels do not discharge to other areas of the site. No water has been discharged from site since 2009/2010	Compliant		
11	The location and specifications of the water supply work(s), as shown on the plan(s) held in the relevant licensor, Yanco Office, must not be altered	Site interview (D Manning)	Copy of the Site map located in site office and training room Location map (including Bywash dam location) included in site specific induction	Compliant		
12	Any water supply work authorised by this approval used for the purpose of conveying, diverting or storing water must be constructed or installed to allow free passage of floodwaters flowing into or from a river or lake.	Site interview (D Manning)	Bywash Dam is not located within a stream channel. The water onsite obtained by rainfall only and pumped from low points on site to the Bywash dam for use in quarry processing	Compliant		
13	The water supply work authorised by this approval must be constructed and maintained in a way that will: A. ensure the work's safe construction and operation, and B. prevent the possibility of damage being caused by the work, or resulting from the work, to any public or private interest.	Site interview (D Manning)	Bywash dam located within the boundary of the quarry site. Water from the Bywash dam does not discharge off site. (Site Photo)	Compliant		
	Water Access Licence: WAL33412 - Allocation 98ML					
CoA #	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation
	Take of Water					
1	Water must only be taken if there is visible flow in the water source at the location where water is to be taken. This restriction does not apply if water is to be taken from an in-river pool, an off-river pool, a runoff harvesting dam, an in-river dam pool or an off-river dam pool	Water is extracted from a site dam		Compliant		

Water supply works approval: 40WA413082 (Work Type: Pump (80mm Centrifugal Pump) and Bywash Dam Lot 21, DP 1180981						
	Requirement	Evidence collected	Audit findings and recommendations	EMM Compliance Status ( <i>Compliant</i> / <i>Non-compliant</i> / Not triggered)	Unique Identification Non-compliance	Recommendation
2	Water must not be taken from Queanbeyan Water Source when flows are in Very Low Flow Class, which means that the flow is 1 ML/day or less at Queanbeyan at the ACT Border gauge (No. 410770). The restriction does not apply if water is to be taken from an off-river pool, an off-river dam pool, a runoff harvesting dam or an in-river dam pool.	Noted				
3	The volume of water taken in any three consecutive years from 1 July 2013 must be recorded in the logbook at the end of those three water years. The maximum volume of water permitted to be taken in those years must also be recorded in the logbook.	Annual Review 2021, 2022 and 2023 NSW Aggregates Water Report 2021, 2022, 2023	(WAL33412 98ML) Total site water usage from dam 2021: 31 ML 2022 16.49 ML 2023: 0ML	Compliant		
4	If water is taken from an off-river pool, then water must only be taken from the pool when the volume of water in the pool exceeds 80% of the full capacity of that pool.	Noted				
5	From 1 July 2013, the total volume of water taken in any three (3) consecutive water years under this access licence must not exceed a volume which is equal to the lesser of either: A. the sum of: i.water in the account from the available water determinations in those 3 consecutive water years, plus ii.water in the account carried over from the water year prior to those 3 consecutive water years, plus iii.any net amount of water assigned to or from this account under a water allocation assignment in those 3 consecutive water years, plus iv.any water re-credited by the Minister to the account in those 3 consecutive water years, or B. the sum of: i.the share component of this licence at the beginning of the first year in those 3 consecutive water years, plus ii.the share component of this licence at the beginning of the second year in those 3 consecutive water years, plus iii.the share component of this licence at the beginning of the third year in those 3 consecutive water years, plus iv.any net amount of water assigned to or from this account under a water allocation assignment in those 3 consecutive water years, plus v.any water re-credited by the Minister to the account in those 3 consecutive water years.	Annual Review 2021, 2022 and 2023 NSW Aggregates Water Report 2021, 2022, 2023	(WAL33412 98ML) Total site water usage from dam 2018: 60.5 ML 2019: 70.8 ML 2020: 36.5ML	Compliant		
6	The maximum water allocation that may be carried over in the account for this access licence from one water year to the next water year is 1 ML/unit share of the share component of the licence	Noted				
Monitoring and Recording						
7	The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planting and harvesting, must be recorded in the logbook each time water is taken	Annual Review 2021, 2022 and 2023 NSW Aggregates Water Report 2021, 2022, 2023	Spreadsheets show water usage types. Standpipe usage, Plant usage and Water cart usage where applicable	Compliant		
8	A logbook must be kept, unless the work is metered and fitted with a data logger. The logbook must be produced for inspection when requested by the relevant licensor	Annual Review 2021, 2022 and 2023 NSW Aggregates Water Report 2021, 2022, 2023	Water meter installed and monthly meter readings captured along with monthly and yearly water usage totals.	Compliant		
9	The completed logbook must be retained for five (5) years from the last date recorded in the logbook.	Annual Review 2021, 2022 and 2023 NSW Aggregates Water Report 2021, 2022, 2023	5 years of spreadsheets sighted	Compliant		
10	The following information must be recorded in the logbook for each period of time that water is taken: a)date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and b)the access licence number under which the water is taken, and c)the approval number under which the water is taken, and d)the volume of water taken for domestic consumption and/or stock watering.	Annual Review 2021, 2022 and 2023 NSW Aggregates Water Report 2021, 2022, 2023	Water usage and rainfall spreadsheets contain usage type (ie. Standpipe or Plant usage), monthly start and end meter readings & monthly usage amounts. The spreadsheet also shows yearly totals for each item.	Compliant		
Reporting						
11	Once the approval holder becomes aware of a breach of any condition on this approval, the approval holder must notify the minister as soon as practicable. the minister must be notified by: A.email: water.enquiries@dpi.nsw.gov.au, or B. telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call	Site interview (D Manning)	No incidents relating to Water Access Licence during the audit period. Water extraction from Bywash dam has not exceeded 98ML during audit period	Compliant		

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# Appendix E

## Site inspection photographs

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Photograph E.1 Weigh station



Photograph E.2 Paper / cardboard waste bin



Photograph E.3 Weigh station and truck wash



Photograph E.4      Depositional dust gauge



Photograph E.5      Steel recycling bin



Photograph E.6      Bunded oil storage area



Photograph E.7      Bunded fuel and waste oil storage area



Photograph E.8 Diesel storage and pump facility



Photograph E.9 Evidence of maintenance of diesel bunded area



Photograph E.10 Spill kit



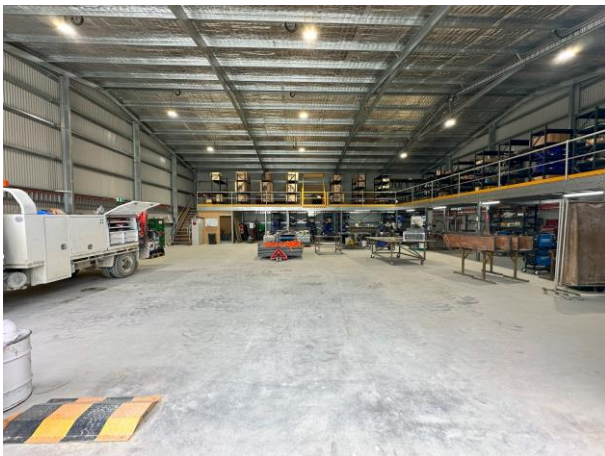
Photograph E.11 Bunded diesel storage area



Photograph E.12 Bunded oil storage



Photograph E.13 Oil separator



Photograph E.14 Workshop facility



Photograph E.15 Product bins



Photograph E.16 SIP Dam



Photograph E.17 ROM bin



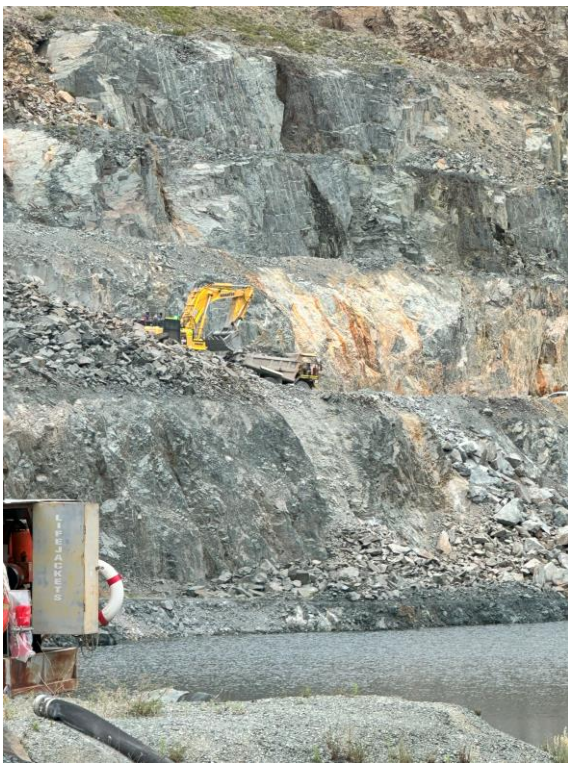
Photograph E.18 SIP Dam



Photograph E.19      Dacite Pit and water cart



Photograph E.20      Dacite Pit Sump



Photograph E.21      Dacite Pit active mining



Photograph E.22      Dacite Pit active mining



Photograph E.23

Dacite Pit active mining



Photograph E.24

Dacite Pit active mining



Photograph E.25

Granite hole



Photograph E.26      Emplacement area



Photograph E.27      Recycled concrete emplacement area



Photograph E.28      Overview of Dacite Pit



Photograph E.29      Dacite Pit active mining –  
Overburden removal



Photograph E.30      Recently topsoiled rehabilitation  
area



Photograph E.31      Rehabilitated emplacement area



Photograph E.32      Rehabilitated emplacement area



Photograph E.33      Rehabilitated emplacement area



Photograph E.34      Crushing and processing facility



Photograph E.35      Crushing and processing facility



**Photograph E.36**      **Depositional dust gauge**



**Photograph E.37**      **High volume air sampler**



**Photograph E.38**      **Water monitoring device**



**Photograph E.39**      **Crushing and processing facility**

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