Holcim (Australia) Pty Limited

Dunloe Park Sand Project

Pottsville, NSW 2489

Independent Environmental Audit 2026



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1. Executive Summary

4Pillars Environmental Consulting (**4Pillars**) was engaged by Holcim (Australia) Pty Limited (**Holcim**, **the Client**) to undertake an Independent Environmental Audit (**IEA**) at the Dunloe Park Sand Project (**the Quarry** or **the Site**), which is an operational quarry located on Pottsville Road, Pottsville, NSW 2489. The Site falls within the Tweed Shire Local Government Area (**LGA**).

This IEA Report has been prepared as required by Project Approval 06_0030 (**the Consent** or **Project Approval** see Appendix 2) Schedule 5, Condition 6. This is the third IEA to be undertaken for the project since quarrying operations commenced in 2008, with previous IEAs conducted in 2016 and 2021. Schedule 5, Condition 6 of the Project Approval requires that an IEA be conducted "w*ithin 2 years of the start of quarrying operations on site, and every 5 years thereafter, unless the Secretary directs otherwise*". It is noted that the initial audit conducted in 2016 was therefore outside of the intended timeframe.

The Audit Team was approved by DPHI on 22 June 2026 (NSW Planning ref: MP06_0030-PA-40, see Appendix 1). This IEA was conducted in accordance with PA 06_0030 Schedule 5, Condition 6 and the NSW Independent Audit Post Approval Requirements, March 2026 (**IAPAR 2026**).

The audit commenced with the opening meeting and subsequent site inspection on Monday 13 July 2026 and included a records review and key personnel interviews.

Audit Findings Summary

In total, 148 conditions of the Project Approval and EPL were assessed as part of this IEA. Of the 148 conditions, 105 were found to be compliant, 5 were non-compliant, and 38 were not triggered.

Based on this audit, the Site has a 97% compliance rate.

Key strengths

- The Site was operating within the approved boundaries and required export/production limits per year.
- No environmental incidents and no complaints were recorded during the audit period.
- Environmental mitigation measures were effectively implemented, including water sprays, water cart, bunding, wash plant management, fines management, etc.
- Water management was of a good standard and no uncontrolled discharges occurred, except for extreme weather events.
- Hydrocarbon management was of a very high standard.
- Site Management were very well educated in environmental matters and systems to manage various environmental requirements and triggers were of a good standard.

Recommendations and observations

Five (5) recommendations have been raised to address non-compliances and five (5) observations and opportunities for improvement have also been identified.

Conclusion

The Dunloe Park Sand Project is being implemented with a good standard of environmental management. The project is compliant with the vast majority of its approval and operational requirements, and the project has a good standing with regulators and the community. The Proponent is resourcing the project well and has highly capable personnel overseeing operations and environmental management.

This IEA is the third conducted under PA 06_0030. It was required within five years of the previous audit (dated 20 July 2021). The Project Approval states that subsequent IEAs are to be conducted every five years following this IEA. To ensure compliance with this requirement, **the next IEA should be scheduled to commence by 13 July 2031**.

2. Introduction

4Pillars Environmental Consulting (**4Pillars**) was engaged by Holcim (Australia) Pty Limited (**Holcim**, **the Client**) to undertake an Independent Environmental Audit (**IEA**) at the Dunloe Park Sand Project (**the Quarry** or **the Site**), which is an operational quarry located on Pottsville Road, Pottsville, NSW 2489. The Site falls within the Tweed Shire Local Government Area (**LGA**).

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The audit commenced with the opening meeting and subsequent site inspection on Monday 13 July 2026 and included a records review and key personnel interviews.

2.1 Project Background

The Dunloe Park Sand Project is an operating sand extraction and processing facility located at Dunloe Park, on Pottsville Road near Pottsville in the Tweed Shire of north-eastern New South Wales. The Quarry is approximately 4.5 km south of Pottsville and around 1 km west of the Pacific Ocean, approximately 25 km south of the NSW–Queensland border.

The site occupies predominantly flat, low-lying land associated with the Mooball Creek floodplain and Sheens Creek sub-catchment. Surrounding land uses are predominantly rural and agricultural, including cattle grazing and sugar cane farming.

The Proponent of the project is Ramtech Pty Ltd, who obtained the initial approval for the development under Project Approval PA 06_0030, granted by the NSW Minister for Planning on 24 November 2008. The approval was subsequently modified in August 2009 (MOD 1) and November 2018 (MOD 2). Ramtech was responsible for the establishment, commissioning and early operation of the quarry before Holcim Australia assumed management of the operation on 1 August 2016. Holcim leases the Site from Ramtech and the lease delegates the vast majority of requirements under the project approval to Holcim.

The quarry extracts predominantly fine sand using a suction dredge, with the recovered material subsequently processed, washed, graded and stockpiled for sale. The site produces high-quality fine concrete sand together with other products including plasterer sand, bunker sand, fill sand, brickies loam and topsoil. The original Environmental Assessment identified the Quarry as a source of construction materials for local and regional markets, particularly concrete batchers, landscapers and builders within the Tweed region and surrounding growth areas, including the Gold Coast to the north and the Byron, Ballina and Lismore areas to the south.

The current operation comprises an extraction or dredge pond (Pond 2), a settlement/fines pond (Pond 1), sand processing (wash plant) and stockpiling areas, associated mobile plant and machinery, site buildings, an unsealed internal haul road and a sealed access road of approximately 2.7 km connecting the quarry with Pottsville-Mooball Road. There is a second approved extraction pond to the south of the current operation (Stage 2).

Under the Consent, sand extraction may continue until 1 January 2035. The approval does not specify an overall tonnage limit for the life of the Quarry, but limits the transport of quarry products from the site to 300,000 tonnes in any financial year and limits extraction depth to generally no more than 12 m below natural ground surface.

2.2 Environmental Approvals

2.2.1 Development Consent(s)

There is one development consent active at the Subject Site – Project Approval 06_0030. The Project Approval was granted on 24 November 2008. The common name of the project is the 'Dunloe Sand Quarry'.

The Project Approval permits the following key activities:

- Extraction, processing and transportation of up to 300,000 tonnes per annum (financial year) of quarry products;

The general layout of the project is shown in Figure 1, and a recent aerial image shown in Figure 2.

The Project Approval has been modified twice at the date of writing this audit, as below:

- MOD 1 (September 2009): Addition of a machinery shed to store machinery and equipment associated with the sand quarry.
- MOD 2 (November 2018): Increase in hourly truck movements.

2.2.1 Current modifications

There are no modifications to the Project Approval currently shown in the Major Projects portal at the time of writing this report.

2.2.2 Environment Protection Licence

The Site conducts the 'Scheduled Activity' under the *Protection of the Environment Operations Act 1997* of Extractive Activities and is covered by Environment Protection Licence (EPL) 13077 (see Appendix 3). The licence version as of the preparation of this Audit Report is dated 5 June 2026.



Figure 1: Approved development layout from the Project Approval.



Figure 2: Aerial image of the Site dated May 2025. Source: Nearmap 2025.

2.2.3 Other documents – assessments, strategies, plans or programs

The following management plans are required under Site approvals. All documents are provided in Appendix 8.

Table 1: Documents required under Site approvals and assessed as part of the audit scope.

Document	Parent approval
Noise Management Plan - July 2020	PA 06_0030
Air Quality Management Plan - February 2020	PA 06_0030
Soil and Water Management Plan - March 2026	PA 06_0030
Landscape Management Plan - April 2022	PA 06_0030
Aboriginal CHMP – December 2019	PA 06_0030
Traffic Management Plan - May 2019	PA 06_0030
Waste Management Plan - July 2020	PA 06_0030
Environmental Management Strategy - July 2021	PA 06_0030
Environmental Monitoring Program - July 2021	PA 06_0030
Pollution Incident Response Management Plan – September 2025	EPL 13077

2.3 Audit Team

The Audit Team is presented in Table 2.

Table 2: Audit Team personnel – roles and qualifications.

Name	Company	Role	Qualifications
Annabelle Tungol	Artea Green Ventures Pty Ltd	Lead Auditor	• Bachelor of Science – Chemical Engineering • Exemplar Global Certified Master Environmental Auditor and Quality Auditor (#119536)
James Hammond	4Pillars Environmental Consulting Pty Ltd	Support Auditor	• Bachelor of Science • Master of Wildlife Habitat Management • EIANZ Certified Environmental Practitioner (#794)
Rhys Thompson	4Pillars Environmental Consulting Pty Ltd	Support Auditor	• Bachelor of Environmental Systems • Master of Environmental Science • Master of Agriculture • EIANZ Certified Environmental Practitioner (#1718)

2.4 Audit Objectives

The primary objective of this IEA is to fulfil the requirements outlined in Schedule 5 Condition 6 of the Project Approval, which details that the Applicant must commission, commence and pay the full cost of an IEA within 2 years of the start of quarrying operations on site, and every 5 years thereafter. The Audit must be conducted in accordance with Schedule 5 Condition 6 of the Project Approval.

Although not explicitly stated in the Project Approval, DPHI required the IEA to be undertaken and finalised in accordance with the IAPAR 2026.

2.5 Audit Scope

The scope of this IEA was as per the Project Approval and IAPAR 2026, and included the following:

- Consultation with relevant parties.
- An assessment of the environmental performance of the development during the audit period and whether it is complying with the relevant requirements in the Project Approval and the EPA Licence;
- An assessment of any assessment, strategy, plan or program required under the abovementioned approvals.
- A review of the adequacy of any approved strategy, plan or program required by the Project Approval and the other abovementioned approval(s).

- Recommendation(s) of appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required by the Project Approval and the other abovementioned approvals.
- The status of implementation of previous IEA findings, recommendations and actions (if any).
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- Any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the Project's past performance and comparison to industry best practices.

2.6 Audit Period

This IEA covers the period between **21 July 2021 – 13 July 2026**, which is the period from the last IEA inspection to the date of commencement of this audit.

2.7 Project activities

Key activities that were carried out during the audit period included:

- Excavation of resources by suction dredge;
- Washing and screening sand materials; and
- Storage and transport of quarry materials.

There have been no changes to the general Site layout since the last audit. Stage 2 is not yet commenced, but is likely to commence in the coming years, as the Stage 1 extraction dam nears completion. The wash plant infrastructure was replaced during the audit period.

3. Audit Methodology

3.1 Selection and Endorsement of Audit Team

In accordance with Section 3.1 of IAPAR 2026, Independent Audits must only be undertaken by a suitably qualified, experienced and independent person(s) whose appointment has been approved by the Secretary.

The Audit Team was approved by DPHI on 22 June 2026 (NSW Planning ref: MP06_0030-PA-40 (see Appendix 1).

3.2 Audit Scope Development

The audit scope and table were developed by 4Pillars based on the conditions of the Project Approval and other approval documents.

No consultation responses were received prior to the site inspection, and therefore could not be taken into consideration while determining the audit scope. The full audit table is presented in Appendix 5.

3.3 Audit Process

3.3.1 Opening Meeting

The opening meeting took place on-site on 13 July 2026 at approximately 10:00 am. Lead Auditor Annabelle Tungol chaired the meeting. The opening meeting was attended by the personnel identified in Section 3.3.4. During the meeting, the discussion encompassed:

- Introductions.
- A confirmation of the objectives and scope of the Audit.
- The resources required to conduct the audit.
- The methodology to be applied during the audit, including the three possible compliance status descriptors.
- An update on the current status of the Project and operations;
- An overview of monitoring and reporting requirements; and

- Any environmental incidents, non-compliances raised, or complaints received.

3.3.2 Conduct of Audit

The IEA was conducted in accordance with the guidance presented in IAPAR 2026, with the intent of obtaining an independent and objective assessment of the environmental performance and compliance status of the Project. The following activities were undertaken:

- Request for approval of the Audit Team by DPHI.
- Consultation with three parties: DPHI, NSW EPA, and Tweed Shire Council. Specific details regarding consultation are provided in Section 3.5.
- A detailed review of the Project Approval, including the development of the audit table.
- Issuing Holcim with a document request for evidence required to assess compliance with the conditions of the Project Approval.
- Reviewing of the provided documentation, including management plans and any information available online, such as the Major Projects portal, POEO Public Register, Nearmap/aerial imagery, etc. (the Desktop assessment).
- Conducting a thorough site inspection and interview with site personnel to further assess compliance.
- Completion of the audit table based on the findings of the document review, site inspection, and interviews.
- Drafting of the audit report (this report), and discussion of findings with the Client, including communication of recommended actions.
- Completion of the audit report, following the addressing of any comments received from the Client.

3.3.3 Closing Meeting

A closing meeting for the audit was conducted on 13 July 2026 at approximately 2:00 pm, attended by the same personnel as the opening meeting. Initial Audit findings were presented, recommendations were discussed (where they had been identified), and post-audit actions were confirmed.

The audit team expressed appreciation to the Proponent and site personnel for their cooperation during the audit process.

3.3.4 Audit Attendance and Site personnel interviewed

The Project personnel present during the site inspection, records review and interview are presented in Table 3. The Audit Team personnel present were Annabelle Tungol and James Hammond, as presented in Table 2.

Table 3: Project personnel present during audit.

Name	Company	Position
Matt Kelly	Holcim	Quarry Manager
Dozie Egeonu	Holcim	Environment Manager, NSW & ACT

3.4 Site Inspection

The Site inspection involved a comprehensive review of the entire Site and operations, to assess whether the conditions identified in the audit table and through consultation had been complied with. Aspects that were assessed included (but were not limited to):

- Air quality;
- Soil and water management;
- Biodiversity;
- Noise and vibration management;
- Waste management; and
- Traffic.

Activities at the Site were being carried out during the site inspection. Observations included:

- Suction dredge was not operational.
- Weighbridge operation and outgoing trucks being weighed and exiting the Site.
- Road haulage operation and activity of trucks on local roads.
- Operation of the wash plant and the Front End Loader moving stockpiled material.
- Operation of Site pumps and other small, fixed plant. Activities in the workshop (maintenance, welding, etc.).

The findings of the site inspection are elaborated upon in the audit table Appendix 5.

3.5 Consultation

On 24 June 2026, consultation via email was undertaken with DPHI, NSW EPA, and Tweed Shire Council (**Council**), to understand whether there were any specific aspects or key focus areas that they wanted to be prioritised or further assessed during the audit.

As at the completion date of this Audit Report, no responses to consultation had been received (except for automated replies). Therefore, no further matters have been identified via consultation.

3.6 Compliance Status Descriptors

The compliance status of each requirement in the audit table was assessed in accordance with Section 3.6 of IAPAR 2026, with each status and its corresponding description presented in Table 4.

No other terms may be used to describe the compliance status of a requirement (e.g. partially compliant, administrative non-compliance etc.), however observations – including identifying opportunities for improvement – may be noted in the audit table in addition to the compliance status descriptor.

Table 4: Compliance Status Descriptors used in the audit.

Status	Description
Compliant	The lead 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 lead 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.

3.7 Evaluation of compliance

Audit findings are based on verifiable evidence. Multiple lines of evidence are preferable, where they are available (i.e. documents, site observations and interview/anecdotal evidence all indicating the same compliance status). Where there is a discrepancy between different pieces of evidence (i.e. a photo in a report indicates compliance but the site inspection indicates non-compliance) then a 'weight of evidence' approach will be taken, whereby the more compelling or more numerous evidence will be accepted.

Acceptable forms of evidence are:

- Documents, records and reports.
- Correspondence.
- Interviews of Site personnel.
- Anecdotal evidence.
- Photographs (must be able to be dated).
- GIS data, maps and aerial/satellite imagery.
- Site inspections and observations.
- Monitoring data and analysis.

- Delivery records, invoices, receipts and other financial records.

3.8 Documentary evidence file

All items of documentary evidence – except for those considered confidential – gathered during the audit are presented in Appendix 8. A list of the documents forming the evidence file is provided in the appendix. The evidence file includes many different formats of information and is provided as a digital file. A reader who does not have access to the digital file should contact 4Pillars to request access.

3.9 Use of Generative Artificial Intelligence

Some elements of this audit report and its appendices have been prepared with the assistance of generative artificial intelligence (Gen AI) tools. Gen AI may have been used to support drafting, structuring and summarisation of information. The use of such tools was limited to administrative and editorial functions and did not replace the professional judgement, expertise or independence of the audit team.

In accordance with the Independent Audit Post-Approval Requirements, all compliance assessments and audit findings are derived from the lead auditor's independent professional judgement and review of verifiable evidence. AI tools were not used to determine compliance outcomes or replace lead auditor decision-making. The auditor remains fully responsible for the content and conclusions of this report.

4. Previous Audit findings

A summary of the conditions where a non-compliance was recorded during the 2021 IEA is provided in Table 12. An update has been provided for each item, including whether the condition was found to be complied with in this audit.

5. 2026 Audit Findings

5.1 Summary of compliance

The level of compliance with requirements assessed in this independent environmental audit is of a high standard, with 97% of requirements 'compliant' or 'not triggered'.

Table 5: Summary of compliance.

Compliance status	Count	%
Compliant	105	71%
Non-compliant	5	3%
Not triggered	38	26%
TOTAL	**148**	**100%**

A breakdown of the compliance status of the Project is presented in figures and tables below. The data have been separated into the following parts:

- PA 06_0030
  - Schedule 1 – Details, Table of Contents, and Definitions.
  - Schedule 2 – Administrative Conditions.
  - Schedule 3 – Environmental Performance Conditions.
  - Schedule 4 – Additional Procedures.
  - Schedule 5 – Environmental Management and Monitoring Conditions.

Table 6: Breakdown of compliance status with PA 06_0030.

SSD Project Approval	Compliant	Non-compliant	Not triggered	TOTAL
Administrative Conditions	14	0	4	18
Environmental Performance Conditions	40	2	6	48
Additional Procedures	1	0	4	5
Environmental Management and Monitoring Conditions	9	2	3	14
TOTAL	**64**	**4**	**17**	**85**
Proportion	**75%**	**5%**	**20%**	**NA**

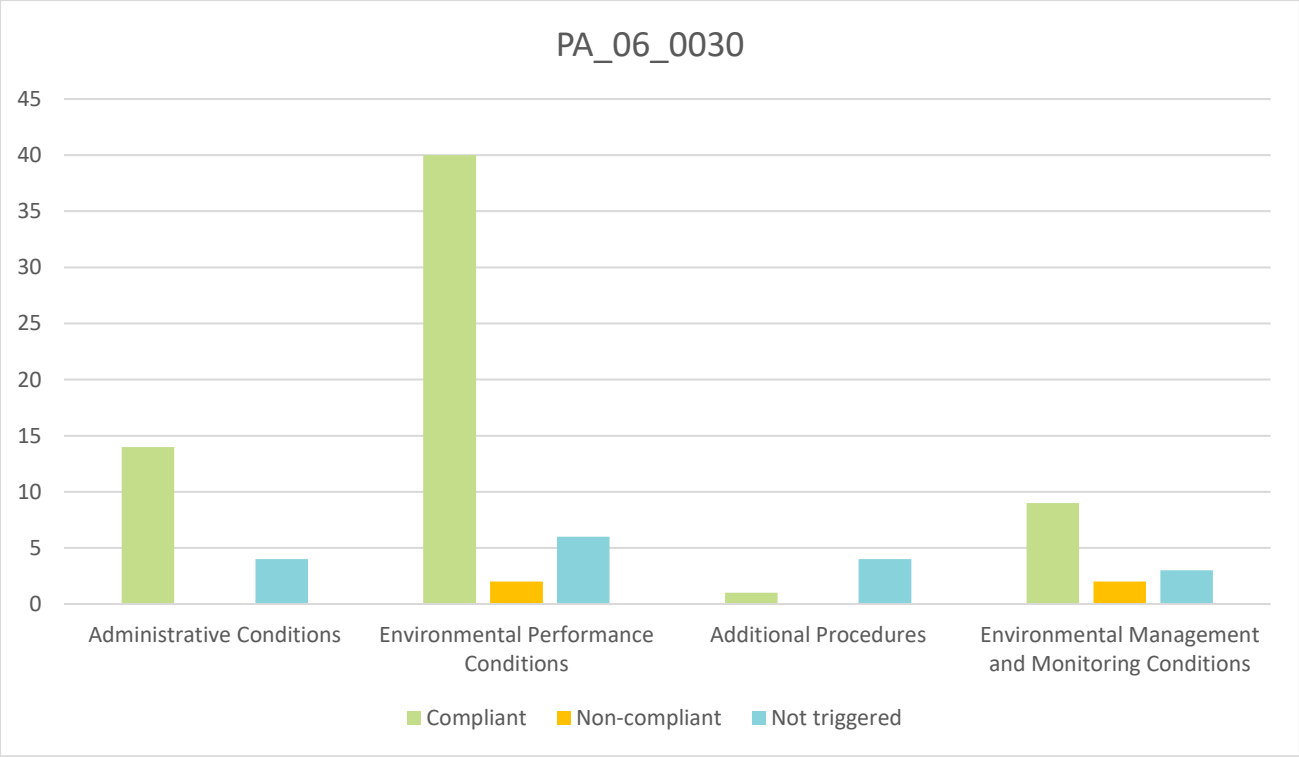


Figure 3: Summary of compliance – Conditions of Project Approval.

Table 7: Breakdown of compliance status with EPL 13077.

EPL Requirements	Compliant	Non-compliant	Not triggered	TOTAL
Administrative Conditions	5	0	0	5
Discharges to Air and Water and Applications to Land	1	0	1	2
General Conditions	3	0	0	3
Limit Conditions	8	0	5	13
Monitoring and Recording Conditions	13	0	5	18
Operating Conditions	10	0	0	10
Reporting Conditions	1	0	10	11
Reporting Documents	0	1	0	1
TOTAL	**41**	**1**	**21**	**63**
Proportion	**65%**	**2%**	**33%**	**NA**

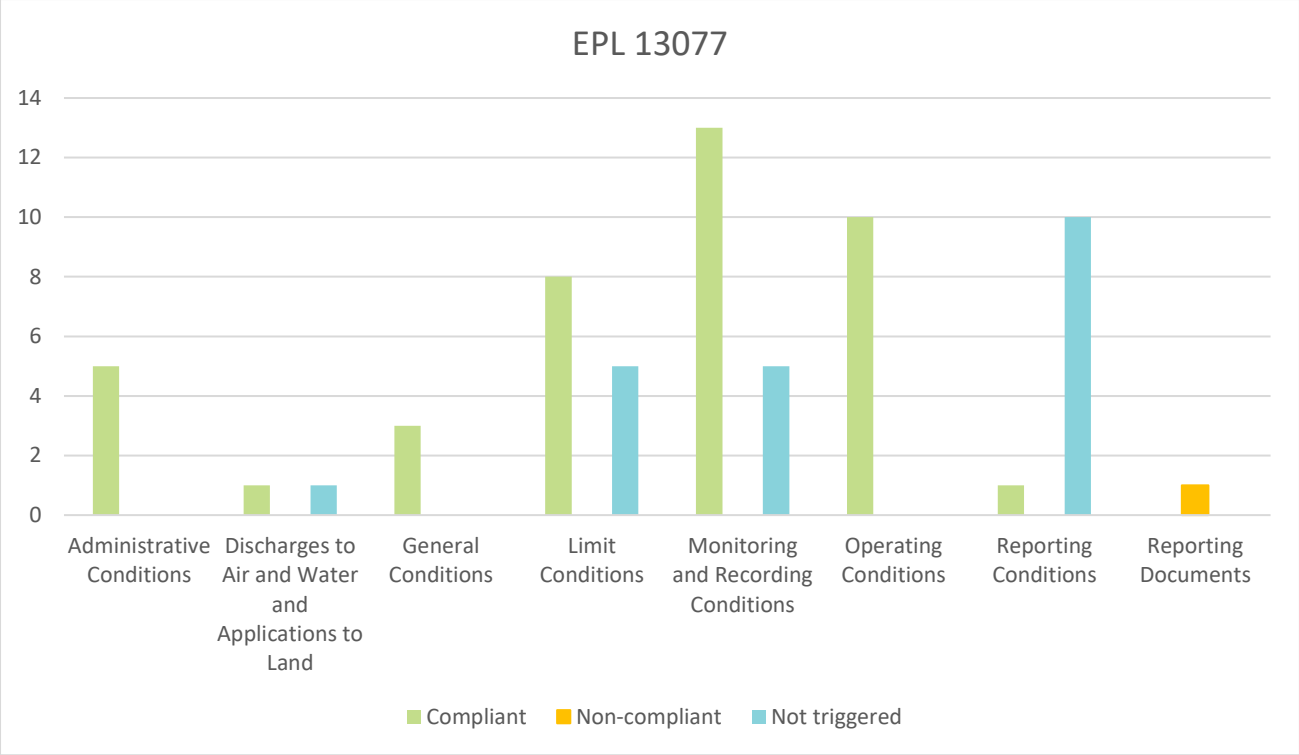


Figure 4: Summary of compliance – EPL 13077.

5.2 Summary of non-compliances during the Audit Period

There were five (5) non-compliances identified during the Audit Period. Further commentary is provided in the 'Recommendations' Section later in this Report.

5.3 Notices, Orders, Penalty Notices or Prosecutions

There were zero (0) notices, orders, penalty notices, or prosecutions during the Audit Period.

There were no formal warnings, official cautions or other similar alerts.

5.4 Complaints

A complaints register is maintained by the Proponent and updated on their website monthly, as required.

No complaints were received during the Audit Period.

5.5 Incidents

There were zero (0) environmental incidents during the Audit Period.

5.6 Environmental management plans, sub-plans and compliance documents

Approved environmental management plan(s) were assessed as part of this IEA. The management plans are referenced in the audit table and itemised in Section 2.2.3 above and the evidence file at Appendix 8.

The appropriate implementation of the approved management plan(s) for the project has been verified during this audit through multiple lines of evidence, which are detailed for specific management plans in Appendix 5.

In accordance with the Project Approval, all management plans and programs are to be reviewed within three months of:

a) the submission of an incident report under condition 4;

b) the submission of an Annual Review under condition 5;

c) the submission of an Independent Environmental Audit under condition 6; or

d) any modifications to the approval.

During the Audit Period, five Annual Reviews were submitted (2021, 2022, 2023, 2024, and 2025), and one IEA report was submitted (the 2021 IEA), a total of six triggers. No other triggers were identified. The audit team is satisfied that the Proponent has sound understanding and procedures in place to ensure management plans are reviewed following these triggers. The audit team has sighted supporting evidence for four triggers, but no evidence has been sighted for a review following the 2021 IEA in early 2022 or following submission of the 2021 Annual Review.

Despite this minor non-compliance, the management plans are considered to be fit for purpose and are being implemented effectively.

5.7 Matters raised in consultation

Table 8: Summary of consultation undertaken.

Stakeholder	Main aspects raised	Response to comments
DPHI	No response	NA
NSW EPA	No response	NA
Tweed Shire Council	No response	NA

5.8 Other matters considered relevant by the Auditor or the Department

No other matters have been identified in the course of the audit.

5.9 Assessment of actual and predicted impacts

As an older major project approval, the September 2007 environmental assessment (EIS) for the project did not include an explicit schedule of predicted impacts. Therefore, the assessment of predicted impacts has been based on a review of the impact assessment documents and the scope of controls included in the EA.

Table 9: Assessment of actual impacts, based on controls specified in the Schedule of Commitments.

Aspect	Summary of key potential impacts and controls	Summary of actual impacts during the audit period	Consistent (yes/no?)
Air quality	Dust impacts were predicted primarily from haulage vehicles, exposed surfaces and stockpiles, with potential PM10 and deposited dust impacts at nearby receivers. Controls include sealed haul roads, watering disturbed areas and stockpiles, vegetated buffers, covered truck loads, limiting stripping during high winds, road cleaning and ongoing air quality monitoring.	Air quality impacts were generally minor and consistent with predictions. Dust controls such as sealed access roads, wetting, covered loads, shaker grids and vegetation buffers were implemented. Annual-average deposited dust results were generally compliant. Some samples were missed or invalid, resulting in monitoring non-compliances. The 2021 DDG4 exceedance was considered unlikely to have been caused by quarry operations. No dust complaints were recorded.	YES
Groundwater	Extraction below the water table had potential to affect groundwater levels and quality, including through disturbance of acid sulfate soils. Modelling predicted no significant adverse effects. Controls include groundwater monitoring, no dewatering of extraction ponds, returning PASS fines below the water table, water quality monitoring and implementation of the Soil and Water Management Plan.	Groundwater monitoring identified periodic exceedances of site-specific groundwater quality objectives, particularly for some metals, salinity and other naturally variable parameters. However, the approval requires the site to strive to achieve these objectives rather than achieve absolute compliance. Improved fines management has reduced the potential for acid sulfate soil oxidation, with pond pH generally neutral to slightly alkaline and no evidence of acute acid sulfate soil impacts during the audit.	YES
Surface water	Potential impacts included erosion, sediment transport, altered drainage and flooding, contaminated runoff, processing water and acid sulfate soil impacts. Controls include perimeter bunding and drainage, sediment controls, staged disturbance, retention of groundcover, internal drainage to quarry ponds, surface water monitoring, maintenance of flood storage and restrictions on discharges.	Surface water monitoring recorded exceedances of some target values, particularly turbidity associated with dredging and storm events. However, these waters were retained within the quarry water-management system and no active discharge occurred during the audit period. Overflow events were associated with extreme rainfall conditions permitted under the EPL. Overall, no evidence of material off-site surface water impacts was identified.	YES

Aspect	Summary of key potential impacts and controls	Summary of actual impacts during the audit period	Consistent (yes/no?)
Noise	Potential noise sources included dredging, screening, loaders and haulage vehicles. Minor exceedances were predicted for some operations without mitigation. Controls include acoustic treatment of plant, earth mounds, equipment maintenance, truck mufflers, speed restrictions, limited operating hours and monitoring. MOD 2 predicted increased truck movements would remain within applicable noise criteria.	Noise impacts were lower than or consistent with those predicted. Quarterly attended monitoring was undertaken throughout the audit period and demonstrated compliance at the assessed residential receivers. Quarry operations were generally inaudible and, when audible, remained below applicable criteria. No noise exceedances or noise-related complaints were identified. The mitigation and operational controls proposed for the project have therefore been effective.	YES
Traffic	Potential impacts included increased heavy vehicle movements, road safety, intersection performance and local amenity. Controls include a dedicated sealed haul road, routing trucks away from Pottsville village, speed restrictions, covered and clean vehicles, intersection safety improvements, signage and line marking, a Traffic Management Plan and Drivers' Code of Conduct.	Quarry-related traffic remained substantially within approved limits. Truck records reviewed during the audit showed hourly movements generally well below the permitted 24 heavy-vehicle movements per hour. The approved haul route, Traffic Management Plan and driver controls remain in place, and loaded trucks were observed covered and the access road free of loose material. No traffic-related complaints or material impacts were identified.	YES
Greenhouse	Greenhouse gas emissions were not identified as a key environmental impact requiring detailed assessment. The original EIA noted that quarry operations would not rely on substantial energy use. Relevant controls include efficient operation and maintenance of plant and equipment and management of vehicle movements. No specific greenhouse mitigation program was proposed.	Greenhouse gas emissions were not identified in the EIA as a significant project impact and no specific greenhouse performance criteria apply to the operation. The audit did not identify evidence of a material change in the nature or intensity of operations that would indicate greenhouse impacts materially different from those anticipated. Plant and equipment were observed to be appropriately maintained and operated.	YES
Ecology	Potential impacts included vegetation disturbance, minor habitat loss and impacts to threatened fauna, including potential koala vehicle strike. Extraction areas were principally disturbed pasture and avoided sensitive vegetation. Controls include disturbance limits, vegetation protection, rehabilitation and revegetation, wildlife corridors, weed management, fauna habitat measures, ecological monitoring and koala management measures.	Biodiversity and rehabilitation management continued throughout the audit period, including vegetation monitoring, weed management, rehabilitation maintenance and koala monitoring. Established rehabilitation areas were generally reported to contain healthy and resilient vegetation. Koala activity remained low, and no quarry-related koala vehicle strikes were identified. Operations also remained within the existing disturbance footprint. Overall ecological impacts remain consistent with the predicted and approved project impacts.	YES
Visual	Quarry infrastructure, extraction areas and stockpiles had potential to alter the rural landscape and views from surrounding properties. Impacts were reduced by separation distances, topography and existing vegetation. Controls include earth mounds, vegetated screening and buffers, retention of vegetation, progressive rehabilitation and landscaping around extraction and operational areas.	Visual impacts remain limited and consistent with the predicted impacts. Vegetated buffers around the Stage 1 extraction area are established and maintained, together with rehabilitation plantings to the north and east. Site observations and aerial imagery confirmed the continued presence of these buffers. No complaints or concerns regarding visual amenity were identified during the audit period, indicating the existing screening measures remain effective.	YES

Aspect	Summary of key potential impacts and controls	Summary of actual impacts during the audit period	Consistent (yes/no?)
Aboriginal heritage	Initial assessment identified no Aboriginal heritage sites within proposed disturbance areas, although potentially sensitive areas and unexpected subsurface material were recognised. Controls include protection of sensitive areas, archaeological investigation where required, consultation, staff induction, an Aboriginal Cultural Heritage Management Plan and stop-work and unexpected-find procedures if cultural material is encountered.	No Aboriginal objects, sites, skeletal remains or other unexpected cultural heritage finds were identified during the audit period. Operations continued under the approved Aboriginal Cultural Heritage Management Plan, with ongoing requirements principally relating to unexpected finds procedures. The absence of recorded disturbance to heritage items is consistent with the EIA findings that significant impacts to Aboriginal cultural heritage were unlikely.	YES

5.10 Level of compliance with schedule of commitments

Appendix 3 of PA_06_0030 is the schedule of commitments for the project. These commitments remain part of the approved project framework, although the conditions of approval prevail where an inconsistency exists.

The project is substantially implementing the environmental intent of the Schedule of Commitments. Physical controls, approved management plans, monitoring and reporting systems are well established, and environmental performance is generally satisfactory.

The principal matters requiring ongoing attention are the reliability and consistency of deposited-dust monitoring, outstanding groundwater take and licensing investigations, and verification of progressive rehabilitation progress.

Several original commitments relate to pre-commencement activities or have been superseded by more detailed contemporary approval requirements and management plans, and should be interpreted in that context.

5.11 Site Inspection Commentary

Commentary and observations from the Site Inspection conducted on 13 July 2026 are provided in Appendix 5 as they relate to specific requirements. Relevant photographs taken during the inspection are provided in Appendix 7.

5.12 Key Strengths and Environmental Performance

- The Site was operating within the approved boundaries and required export/production limits per year.
- No environmental incidents and no complaints were recorded during the audit period.
- Environmental mitigation measures were effectively implemented, including water sprays, water cart, bunding, wash plant management, fines management, etc.
- Water management was of a good standard and no uncontrolled discharges occurred, except for extreme weather events.
- Hydrocarbon management was of a very high standard.
- Site Management were very well educated in environmental matters and systems to manage various environmental requirements and triggers were of a good standard.

6. Observations and Recommendations

In total, 148 conditions of the Project Approval and EPL were assessed as part of this IEA. Of the 148 conditions, 105 were found to be compliant, 5 were non-compliant, and 38 were not triggered.

Based on this audit, the Site has a 97% compliance rate.

Five (5) recommendations have been raised to address non-compliances and five (5) observations and opportunities for improvement have also been identified.

6.1 Observations and opportunities for improvement

The below observations are made for the Proponent's consideration.

Table 10: Observations raised during this audit.

Condition of Consent	Requirement	Evidence file (Appendix 8)	Comments/Findings	Compliance status	Observation	Observation detail
Project Approval 06_0030						
Sch 2 (4)	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with the conditions of this approval; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the conditions of this approval; and (c) the implementation of any actions or measures contained in these documents.	4.02, 8.04, 8.05	The Department's response to the 2023 Annual Review directed Holcim to split out Incidents and Non-compliances in future Annual Reviews. The 2024 AR acknowledged this requirement and referred to sections 6 and 12. 2025 did not explicitly reference the requirement but followed the same format at 2024. Section 6 (Environmental Performance) notes and discusses non-compliances where they occur. Section 12 continues to be referenced as 'Incidents and Non-compliances'. In 2024, section 12 lists invalidated dust samples and 2025 also lists invalidated dust results. An 'Incident' is defined in the Consent. A missed measurement is not an 'incident' and should be reported as a non-compliance only. Although the Department's direction has been acknowledged and complied with, in that a change has been made to future reports, the response could be improved. No other directions or requests have been identified. The previous audit identified this condition as non-compliant on the basis of previous audit recommendations not being implemented. This audit team's view of this condition is that unless the Secretary has instructed Holcim to implement the findings of previous audits, non completion of previous recommendations would not trigger a non-compliance with this particular condition. We are not aware of any such specific instruction from the Planning Secretary following the 2021 audit.	Compliant	Observation 1.	Section 12 should be revised in future Annual Reviews to be titled 'Incidents' and the corresponding table should contain Incidents as defined in the Consent only. A separate table in Section 6 or elsewhere could be used for tabulating non-compliances that do not meet the criteria for an 'Incident'. The Department has specified that missed measurements are not 'incidents'. Refer to the latest version of the Post Approval Compliance Reporting Guideline (March 2026 at the time of writing).
Sch 5 (10)	Within 1 month of the approval of any plan/strategy/program required under this approval (or any subsequent revision of these plans/strategies/programs), or the completion of any independent environmental audit or Annual Review, the Proponent must: (a) provide a copy of the relevant document/s to Tweed Shire Council and relevant agencies; and (b) ensure that a copy of the relevant document/s is made publicly available on site and/or at the Proponent's regional office, to the satisfaction of the Secretary.	8.06, 8.07, 10.11	a) Evidence has been sighted of submission of the 2025 Annual Review and the 2026 Soil and Water Management Plan to Tweed Shire Council and the 2023 Annual Review to the NSW EPA. Anecdotal evidence suggests that previous annual reviews and updated plans were also submitted, however every instance has not been verified with documentary evidence. Council is engaged in the project and the website provides a sound and up to date record of documents. b) Documents are available on the Company website. RFI: Evidence of provision within 1-month timeframe.	Compliant	Observation 2.	Review internal processes and reminders/automations to ensure that Council and other relevant agencies are provided copies of updated plans, audits and Annual reviews. Consider a checklist or similar standardised form for managing administrative requirements for these documents.
EPL 13077						
O4.4	The licensee must ensure that sampling point(s) for water discharged from the Silt Pond(s) or Dredge Pond(s) are provided and maintained in an appropriate condition to permit: a) the clear identification of each Dredge Pond and Sediment Dam and discharge point(s); b) the collection of representative samples of the water discharged from the Silt Pond(s) and Dredge Pond(s); and, c) access to the sampling points(s) at all times by an authorised officer of the EPA.	10.03, 10.09, 1.01, 1.03	There is no requirement to physically mark the sample/discharge points in the ponds. They are marked on site maps, notably the map in the approved 2026 SWMP. However, no signage or physical marker was observed on Site. A physical marker would be a helpful addition for SIte management. The locations are readily accessible and identifiable and can be accessed easily by any EPA officer.	Compliant	Observation 3.	Consider physical markers/signage identifying the two surface water sampling/discharge locations.
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	9.01, 9.02, 9.03, 9.04, 9.05, 9.06	No complaints were made during the audit period and hence, the requirement to capture these details has not been triggered. However, the register/complaints form do not appear to have the requisite fields to meet the EPL requirements in the event that a complaint was received.	Compliant	Observation 4.	Revise the Complaint Register and/or the complaint record form to include all fields and details required by the EPA licence.

Condition of Consent	Requirement	Evidence file (Appendix 8)	Comments/Findings	Compliance status	Observation	Observation detail
R1.5	If the licensee undertakes monitoring as a result of a licence condition, the licensee must supply to the EPA a summary of the results of the pollution monitoring data in respect of each reporting period. The summary must be provided as a Microsoft Excel file, formatted with the following column headings: a.EPA point identification number; b.pollutant; c.unit of measure; d.number of samples required; e.number of samples collected and analysed; f.lowest sample value; g.mean of sample values; and h.highest sample value. The pollution monitoring data summary for the reporting period must be supplied to the EPA via the EPA's online digital portal by the "due date", as defined in the dictionary at the end of this licence.	1.03, 14.04	The 'Due date' as defined in the EPL is 60 days after the end of each 'Reporting period', which is defined as the annual anniversary date after the licence issue date. This means that the monitoring summary must be submitted in accordance with condition R1.5 within 60 days of the anniversary date each year (10 June). The first monitoring summary under this new condition was therefore due by 10 August 2026, which is outside of the audit period.	Not triggered	Observation 5.	Review reporting system reminders and processes to ensure that triggers are set to send the annual monitoring summary to the NSW EPA by no later than 10 August each year.

6.2 Recommendations

To address non-compliances, the following recommendations are made.

Table 11: Non-compliances raised during this audit.

Condition of Consent	Requirement	Evidence file (Appendix 8)	Comments/Findings	Compliance status	Recommendation	Recommendation detail
Project Approval 06_0030						
Sch 3 (7A)	Within three months of the approval of Modification 2, the Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with the EPA; (c) describe the measures to be implemented to ensure: (i) compliance with the air quality criteria and operating conditions in this approval; (ii) best practice management is being employed; and (iii) air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events; (d) describe the air quality management system; and (e) include an air quality monitoring program that: (i) is capable of evaluating the performance of the project against the air quality criteria; (ii) adequately supports the air quality management system; and (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. The Project must implement the Air Quality Management Plan as approved by the Secretary.	10.02, 13.01, 1.03, 7.06, 7.07, 7.08, 7.09, 7.1, 10.11, 10.02, 8.01, 8.05, 1.01, 1.02	Operations are conducted in accordance with the February 2020 Air Quality Management Plan (the AQMP). The AQMP was previously assessed (in the 2021 IEA) to satisfy the requirements of this Condition, however was not submitted within three months of the approval of Modification 2 (approved in November 2018) and this Condition was therefore considered Non-compliant. Noting that the timeframe for submission falls outside (prior to) this Audit Period, this is considered not triggered for this Audit Period. Implementation of the AQMP has been broadly achieved, however there were a number of instances where samples were contaminated, unable to be collected due to damage to gauges etc. Instances where the averaging period was extended due to inability to collect gauges due to extreme weather etc. are not regarded as non compliances, as a monitoring result could still be obtained. A strict view of compliance with implementing the AQMP would require a valid result to be collected each month. It is arguable that damage to gauges and cross-contamination are not 'non-compliances' with implementation as Holcim made all reasonable efforts to implement the AQMP. However, considering Holcim has self-reported and identified these missed measurements as non-compliances in Annual Reviews and the Department has accepted/reiterated them as non compliances in their reply correspondence, the audit team records the 13 missed measurements (13 out of 240; 5.5% of required measurements) in the audit period as a non-compliance. Holcim achieved almost 95% compliance with measurement frequency.	Non-compliant	Recommendation 1.	Continue to implement the AQMP, including making best efforts to ensure dust gauges maintained and protected from contamination, noting some damage and contamination events are unavoidable. Consider in future whether such events are in fact a non-compliance for the purpose of Annual Reviews.
Sch 3 (12)	The Proponent must manage on-site sewage to the satisfaction of Council and EPA. The facility must comply with the requirements of the *Environment and Health Protection Guidelines – On-site Sewage Management for Single Households (1998)*.	13.01, 6.01	Tweed Shire Council issued an approval for the On-Site Sewage system in July 2017, however the approval lapsed around 2023. Since then, we are advised the SIte has been working with Council to reinstate the approval. Plumber is now preparing documents for Council to get a renewed permit/approval for the OSSS. The system tanks were observed to be above ground with no evidence of leakage. The disposal area showed no signs of effluent on the surface and vegetation was maintained. There is insufficient evidence that Holcim is managing on-site sewage to the	Non-compliant	Recommendation 2.	The audit team notes that the AWTS approval has been granted dated 15/9/2026. This audit recommendation has been closed out prior to the audit report being finalised.

Condition of Consent	Requirement	Evidence file (Appendix 8)	Comments/Findings	Compliance status	Recommendation	Recommendation detail
			'satisfaction' of Council and the NSW EPA. A permit/approval for the OSSS is the appropriate mechanism to demonstrate this and should be reinstated as soon as possible.			
Sch 5 (1B)	Within 3 months of the submission of: (a) an incident report under condition 4 below; (b) an Annual Review under condition 5 below; (c) an audit report under condition 6 below; and (d) any modifications to this approval, the Proponent must review the strategies, plans and programs required under this approval, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary. *Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the project.*	8.01, 8.02, 8.03, 8.04, 8.05, 4.04, 4.06, 4.07	Five Annual Reviews were submitted during the Audit Period, for 2021-2025. The 2021 Audit Report was completed in February 2022 and submitted shortly after. No incidents occurred in the audit period and there were no further modifications to the Consent. Evidence has been provided of review of management plans and notification of the Department following the 2022, 2024 and 2025 Annual Reviews. No evidence has been sighted in relation to review of management plans specifically following submission of the 2021 IEA in early 2022 or following submission of the 2021 Annual Review.	Non-compliant	Recommendation 3.	Ensure that management plans are appropriately reviewed following all triggers, including audits and annual reviews.
Sch 5 (7)	Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Secretary, the Proponent 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, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.	13.01	The 2021 IEA was commenced (as per the explanation above) on 20 July 2021. Therefore, in order to comply with this condition, the report would need to be submitted to the Department by 20 October 2021. The 2021 IEA report was not completed until February 2022. No extension correspondence or other evidence has been sighted that confirms more time was allowed for submission. The 2026 IEA was commenced on 13 July 2026 and is due 13 October 2026.	Non-compliant	Recommendation 4.	Ensure that future audit reports are complete and submitted within 3 months of commencement of the audit (commencement taken to be the date on which the site inspection is completed).
EPL 13077						
R2.1	The licensee must also include the following information with the Annual Return: •A statement detailing the total volume of material extracted from the quarry for the reporting period; and •The total volume of extracted material transported from the premises for the reporting period.	1.03, 14.04, 8.08, 8.09, 8.1, 8.11	No evidence has been provided to confirm that this information was provided to the EPA with annual returns, in a format that aligned with the EPL reporting year. There is no standard field in the Annual Return for this information, and it would need to be supplied as a separate email or other correspondence. Links were given in the annual return to the company website, which contain calendar year production data; however, no data was available to the EPA to confirm production for the EPL reporting year. This condition no longer appears to be relevant as Annual Returns are no longer required by the EPA. This condition should be reworded by the EPA to align with the monitoring summary at Condition R1.5. The Proponent should submit the data required by this condition along with the monitoring summary required at R1.5.	Non-compliant	Recommendation 5.	The Proponent has already clarified the requirements of this condition, now that Annual Returns are no longer required. The EPA notes that this information should be submitted by the 'licence due date' as defined in the EPL and should be submitted via the EPA Econnect system.

6.3 Assessment of previous non-compliances

Table 12: Assessment of previous audit non-compliance.

Non-compliance ID	Condition of Approval	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2026 IEA
Project Approval 06_0030					
06-0030 Mod2 2021/A	Schedule 2 CoA 4(b & c)	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the conditions of this approval; and (c) the implementation of any actions or measures contained in these documents.	Several actions from the previous audit are still open (Table 3-2). **Recommended Action**: Address and close actions from the previous audit.	Non-compliant	Compliant
06-0030 Mod2 2021/B	Schedule 3 CoA 5	Within three months of the approval of Modification 2, the Proponent must prepare a Noise Management Plan for the project to the satisfaction of the Secretary.	Mod 2 approved Nov 2018, consultation with EPA in Aug 2019, DPIE approval of NMP July 2020. As such the plan was not prepared within three months of Mod 2 approval. **Recommended Action**: Nil. Plan now developed and approved.	Non-compliant	Compliant
06-0030 Mod2 2021/C	Schedule 3 CoA 7(a)	Within three months of the approval of Modification 2, the Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary.	Mod 2 approved Nov 2018, consultation with EPA in Aug 2019, DPIE approval of plan Feb 2020. As such the plan was not prepared within three months of Mod 2 approval. **Recommended Action**: Nil. Plan now developed and approved.	Non-compliant	Compliant
06-0030 Mod2 2021/D	Schedule 3 CoA 9	The Proponent must aim to meet the water quality objectives (WQO) in Table 4 for water in the dredge ponds and in groundwater adjacent the dredge ponds, unless otherwise approved by the Secretary.	Pond turbidity levels exceeded the WQO for Turbidity in 2017 and 2018, likely due to 90% rainfall/flooding. Pond pH levels are consistently below (more acid) the WQO, however they are within the range for upgradient groundwater. In bore hole six ground water levels of pH, sulphate, aluminium and Iron are outside the nominated levels and the levels measured in other bores. The exceedances were major in 2015-2018 but have improved in recent years. **Recommended Action**: Stockpiling of screened material should be managed to reduce the transmission to ground water of stormwater that infiltrates the stockpile. Investigate forming stockpile areas so they drain to the ponds, lining the stockpile areas with a barrier to prevent seepage to groundwater and lining drains to the ponds with limestone or similar.	Non-compliant	Compliant
06-0030 Mod2 2021/E	Schedule 3 CoA 17	The Proponent must ensure that the flood storage capacity of the site is no less than the pre-existing flood storage capacity at all stages of the project. Details of the available flood storage capacity must be reported in the Annual Review.	Flood storage capacity not reported in the Annual Review for 2018 to 2020. **Recommended Action**: Report on flood storage capacity in the Annual Review.	Non-compliant	Compliant
06-0030 Mod2 2021/F	Schedule 3 CoA 18(b)	The Acid Sulphate Soil Management Plan (ASSMP) specifies the use of lime in the wash plant to adjust pH.	The site is using granular sodium bicarbonate in the wash plant to adjust pH. This is not documented in the plan. **Recommended Action**: Document the use of a range of alkalis in the wash plant to allow flexible pH management.	Non-compliant	Compliant
06-0030 Mod2 2021/G	Schedule 3 CoA 18(c)	The Proponent must implement the plan as approved by the Secretary.	Some historic actions were not completed for monitoring (accidental) and changes have occurred without being documented or approved. **Recommended Action**: Update the management plan to include current and planned actions that deviate from the SWMP.	Non-compliant	Compliant
06-0030 Mod2 2021/H	Schedule 3 CoA 35(b)	Traffic Management Plan (TMP) and driver code of conduct to include; complaint resolution procedures and consultation measures for peak haulage periods.	Code of conduct does not include complaint resolution procedures or consultation measures for peak haulage periods. **Recommended Action**: Insert cross reference to EMS for complaint resolution. Insert cross reference to TMP for community consultation.	Non-compliant	Compliant
06-0030 Mod2 2021/I	Schedule 5 CoA 1(b)	…prepare an Environmental Management Strategy (EMS) for the project.. (b)… in consultation with the relevant agencies	The EMS 2020 notes agency consultation but it is not appended to the plan on the web site. **Recommended Action**: Add agency consultation to EMS.	Non-compliant	Compliant
06-0030 Mod2 2021/J	Schedule 5 CoA 1(f)	…prepare an EMS for the project.. (f) describe the procedures that would be implemented to: manage cumulative impacts;	Cumulative impacts are not specifically addressed.	Non-compliant	Compliant

Non-compliance ID	Condition of Approval	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2026 IEA
			Recommended Action: Include a statement addressing cumulative impact for multiple issues or singular repeat issues.		
06-0030 Mod2 2021/K	Appendix 3 SoC	Surface water quality monitoring shall be … as outlined in the draft EMP App. G	Some water quality monitoring was not completed due to subcontractor errors. This has subsequently been rectified. **Recommended Action**: Ensure subcontractors complete monitoring as required.	Non-compliant	Compliant
06-0030 Mod2 2021/L	Appendix 3 SoC	Provision of in situ monitoring equipment at all times for use by Quarry Staff. This Equipment will be calibrated at least monthly	All monitoring completed by contractors at the required frequency. For ad hoc issues pH strips are available on site. **Recommended Action**: Redundant statements of commitment need to be removed from Schedule 3	Non-compliant	Compliant
06-0030 Mod2 2021/M	Appendix 3 SoC	Groundwater monitoring bores are to be licensed with DIPNR (Water NSW)	License details could not be located on Water NSW Website. **Recommended Action**: Register monitoring bores with Water NSW.	Non-compliant	Non-compliant
06-0030 Mod2 2021/N	Appendix 3 SoC	Contour profiling of groundwater head data will be undertaken as part of site monitoring and reporting procedure.	Head data assessed based on AHD. Contouring not available in the reporting period, Rambolt Report dated September 2021. **Recommended Action**: Ground water head data assessed in Ramboll Report September 2021. Issue Closed.	Non-compliant	Non-compliant
06-0030 Mod2 2021/O	Appendix 3 SoC	All operations to be limited to 7am to 6pm Monday to Friday and 7am to 12am Saturday.	Truck loaded 15 minutes early. **Recommended Action**: Issue closed out, no further action required.	Non-compliant	Compliant

7. Conclusion

The Dunloe Park Sand Project is being implemented with a good standard of environmental management. The project is compliant with the vast majority of its approval and operational requirements, and the project has a good standing with regulators and the community. The Proponent is resourcing the project well and has highly capable personnel overseeing operations and environmental management.

This IEA is the third conducted under PA 06_0030. It was required within five years of the previous audit (dated 20 July 2021). The Project Approval states that subsequent IEAs are to be conducted every five years following this IEA. To ensure compliance with this requirement, **the next IEA should be scheduled to commence by 13 July 2031**.

Continued attention to detail in implementing the Project Approval and broader environmental requirements will ensure a continued good standard of performance in the future.

Implementation of the recommendations and observations from this audit will assist in further improving levels of compliance and audit performance in the future.

8. List of appendices

Appendix 1. Audit Team Endorsement.

Appendix 2. Project Approval.

Appendix 3. Environment Protection Licence.

Appendix 4. Independent Audit Declaration Form.

Appendix 5. Audit Table.

Appendix 6. Not used.

Appendix 7. Photo log of Site Inspection.

Appendix 8. Documentary Evidence File.

Appendix 1 Audit Team Endorsement

Department of Planning, Housing and Infrastructure

Reference: MP06_0030-PA-40

Dozie Egeonu
Environmental Manager – NSW & ACT
Holcim (Australia) Pty Ltd
22/06/2026

Sent via the Major Projects Portal only

Subject: Dunloe Quarry – 2026 Independent Auditor Nomination

Dear Mr Egeonu,

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person(s) to conduct an Independent Audit of the Dunloe Quarry (**Project**). The request was submitted as required by Schedule 5, Condition 6 of MP06_0030, as modified (**Approval**) to NSW Department of Planning, Housing and Infrastructure (**Department**) on 17 June 2026.

The Department has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed person(s) are suitably qualified, experienced, and independent.

In accordance with Schedule 5, Condition 6 of the Approval and the Department's *Independent Audit Post Approval Requirements* (2026) (the **IAPAR**), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Annabelle Tungol, Artea Green Ventures Pty Ltd (Lead Auditor)
- James Hammond, 4 Pillars Environmental Consulting (Support Auditor)
- Rhys Thompson, 4 Pillars Environmental Consulting (Support Auditor)

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Independent Audit must be prepared, undertaken, and finalised in accordance with the conditions of approval and the IAPAR. Failure to meet these requirements will require revision and resubmission.
- The above audit team is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development. Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.
- The Lead Auditor must attend the site inspection component of the audit.

- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact Astrid Christensen, Senior Compliance Officer via email: compliance@planning.nsw.gov.au.

Yours sincerely

Nick Ballard

Nick Ballard
Team Leader – Far North Region
Compliance

As nominee of the Planning Secretary

Appendix 2 Project Approval

Project Approval

Section 75J of the *Environmental Planning and Assessment Act 1979*

I approve the project application referred to in schedule 1, subject to the conditions in schedules 2 to 5.

The reason for these conditions is to:
- prevent, minimise, and/or offset adverse environmental impacts;
- set standards and performance measures for acceptable environmental performance;
- require regular monitoring and reporting; and
- provide for the on-going environmental management of the project.

The Hon Kristina Keneally MP
Minister for Planning

Sydney 2008

SCHEDULE 1

Project Application:	06_0030
Proponent:	Ramtech Pty Ltd
Approval Authority:	Minister for Planning
Land:	Lot 1 DP208249; Lot 182 DP755721; Lot 183 DP755721; Lot 44 DP755721; Lot 81 DP755721; Lot 162 DP755721; Lot 2 DP 780199; Lot 1 DP780199; Lot 1 DP780200; Lot 2 DP785895
Project:	Dunloe Park Sand Project

Blue text represents the Machinery Shed Modification MOD 1 – September 2009
Green text represents the increase in hourly truck movements modification MOD 2 – November 2018

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DEFINITIONS

Annual Review	The review required by condition 5 of Schedule 5
AHD	Australian Height Datum
BCA	Building Code of Australia
CCC	Community Consultative Committee
Conditions of approval	Conditions contained in Schedules 2 to 5 inclusive
Council	Tweed Shire Council
Day	The period from 7.00am to 5.00pm, Monday to Friday, and 8.00am to 1.00pm on Saturdays
Department	Department of Planning and Environment
DoI	Department of Industry – Lands and Water
DPI Fisheries	Fisheries Division of the Department of Primary Industries
DRG	Division of Resources and Geoscience of the Department
EA	Environmental Assessment of the project titled *Environmental Assessment Part 3A – Environmental Planning and Assessment Act, 1979, Dunloe Sands – Ramtech P/L, prepared by PLANIT Consulting dated 17 September 2007*, including the response to issues raised in submissions, dated March 2008
EA (MOD 1)	Environmental Assessment of the project titled 'Environmental Assessment - Proposed Machinery Shed Minor Modification to Project Approval 06_0030, August 2009'
EA (MOD 2)	Environmental Assessment of the project titled 'Dunloe Sands Quarry Modification to Project Approval 06/`-0030 Environmental Assessment', dated July 2017 and the Proponent's response to submissions document dated November 2017
EPA	Environment Protection Authority
EP&A Act	*Environmental Planning and Assessment Act 1979*
EP&A Regulation	*Environmental Planning and Assessment Regulation 2000*
EPL	Environment Protection Licence under the *Protection of the Environment Operations Act 1997 (POEO Act)*
Feasible	Feasible relates to engineering considerations and what is practical to build
Heavy Vehicle	A vehicle that has a Gross Vehicle Mass or Aggregate Trailer Mass of more than 4.5 tonnes
Incident	A set of circumstances that: • causes or threatens to cause material harm to the environment; and/or • breaches or exceeds the limits or performance measures/criteria in this approval
Land	As defined in the EP&A Act, except where the term is used in the noise and air quality conditions in Schedules 3 and 4 of this approval, where it is defined as the whole of a lot, or contiguous lots owned by the same landowner, in a current plan registered at the Land Titles Office at the date of this approval
Material harm to the environment	Is harm that: • involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial, or • results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding $10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment) This definition excludes "harm" that is authorised under either this approval or any other statutory approval
Minister	Minister for Planning, or delegate
Mitigation	Activities associated with reducing the impacts of the project
Modification 2	The modification to the project as described in EA (MOD 2)
POEO Act	*Protection of the Environment Operations Act 1997*

Privately-owned land		Land that is not owned by a public agency or a quarrying company
Project		The development as described in the EA
Proponent		Ramtech Pty Ltd, or its successors in title
Quarrying operations		The extraction, processing, stockpiling and transportation of extractive materials carried out on the site and the associated removal of vegetation, topsoil and overburden
Quarry products		Includes all saleable quarry products, but excludes tailings, other wastes and rehabilitation material
Reasonable		Reasonable relates to the application of judgement in arriving at a decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements
Rehabilitation		The restoration of land disturbed by the development to a good condition and for the purpose of establishing a safe, stable and non-polluting environment
RMS		Roads and Maritime Services
Secretary		Planning Secretary under the EP&A Act, or nominee
SEPP		State Environmental Planning Policy
Statement of Commitments		The Proponent's commitments in Appendix 3
Site		Land to which the Project Approval applies

SCHEDULE 2
ADMINISTRATIVE CONDITIONS

Obligation to Minimise Harm to the Environment

1. In addition to meeting the specific performance measures and criteria established under this approval, the Proponent must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the project, and any rehabilitation required under this approval.

Terms of Approval

2. The Proponent must carry out the project generally in accordance with the:
   (a) EA, EA (MOD 1) and EA (MOD 2); and
   (b) Statement of Commitments.

   Notes:
   - *The general layout of the project is shown in Appendix 1; and*
   - *The Statement of Commitments is reproduced in Appendix 3.*

2A. The Proponent must carry out the project in accordance with the conditions of this approval.

3. If there is any inconsistency between the documents referred to above, the conditions of this approval shall prevail to the extent of any inconsistency.

4. The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:
   (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with the conditions of this approval;
   (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the conditions of this approval; and
   (c) the implementation of any actions or measures contained in these documents.

Limits on Approval

5. Sand extraction operations may take place until 1 January 2035.

   Note: Under this Approval, the Proponent is required to rehabilitate and revegetate the site to the satisfaction of the Secretary. Consequently this approval will continue to apply in all other respects other than the right to conduct quarrying operations until the site has been rehabilitated and revegetated to a satisfactory standard.

6. The Proponent must not extract to a depth of more than 12 m below the natural ground surface.

   Note: The Department acknowledges that this limit may have a variance of +/- 1m.

7. The Proponent must not transport more than 300,000 tonnes of quarry products in any financial year from the site.

8. The Proponent must ensure that heavy vehicle movements (in and out) associated with the project do not exceed 24 per hour.

Staging, Combining and Updating Strategies, Plans or Programs

9. With the approval of the Secretary, the Proponent may:
   (a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the project to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program);
   (b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and

(c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the project).

9A. If the Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.

Application of Existing Strategies, Plans or Programs

9B. The Proponent must continue to apply existing management strategies, plans or monitoring programs approved prior to the approval of Modification 2, until the approval of a similar plan, strategy or program following the approval of Modification 2.

Structural Adequacy

10. The Proponent 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 Proponent 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 project.*

Demolition

11. The Proponent must ensure that all demolition work is carried out in accordance with *AS 2601-2001: The Demolition of Structures*, or its latest version.

Operation of Plant and Equipment

12. The Proponent 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.

Road Maintenance Contributions

13. Prior to increasing heavy vehicle movements (in and out) above eight per hour, the Proponent must pay Council $182,280 in accordance with Council's Tweed Road Contribution Plan, unless a deferred payment agreement is executed under Council's Business Investment Policy, in which case contributions are to be paid in accordance with that agreement.

Compliance

14. The Proponent must ensure that all employees, contractors and sub-contractors are made aware of, and instructed to comply with, the conditions of this approval relevant to their respective activities.

Evidence of Consultation

15. Where consultation with any public authority is required by the conditions of this approval, the Proponent must:
    (a) consult with the relevant public authority prior to submitting the required document to the Secretary for approval;
    (b) submit evidence of this consultation as part of the relevant document; and
    (c) describe how matters raised by the authority have been addressed and any matters not resolved.

SCHEDULE 3
ENVIRONMENTAL PERFORMANCE CONDITIONS

GENERAL EXTRACTION AND PROCESSING PROVISIONS

Identification of Boundaries

1. Within 1 month of the date of approval of the Landscape Management Plan (see condition 27 below), the Proponent must:
   (a) engage a registered surveyor to mark out the boundaries of the approved limits of extraction;
   (b) submit a survey plan of these boundaries to the Secretary; and
   (c) ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits.

   Note: The limit of extraction includes the area described in the EA and shown conceptually on the plan in Appendix 1.

NOISE

Impact Assessment Criteria

2. The Proponent must ensure that the noise generated by the project does not exceed the criteria in Table 1 at any residence on privately-owned land.

Table 1: *Noise Impact Assessment Criteria*

Receiver Location	***Day $L_{Aeq\ (15\ min)}$ dB(A)***
R6 and R7	42
R8	48
All other residences	41

Noise generated by the project must be monitored and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the *NSW Noise Policy for Industry* (EPA, 2017).

The noise criteria in Table 1 do not apply if the Proponent has an agreement with the owner/s of the relevant residence or land to exceed the noise criteria, and the Proponent has advised the Department in writing of the terms of this agreement.

Hours of Operation

3. The Proponent must comply with the operating hours in Table 2.

Activity	***Day***	***Time***
Sand extraction and processing, delivery and distribution, and other quarry related activities	Monday – Friday	7:00am to 5:00pm
	Saturday	7:00am to 12:00pm
	Sunday and Public Holidays	Nil
Maintenance (if inaudible at neighbouring residences)	Any day	Any time

Table 2: Operating Hours

Noise Operating Conditions

4. The Proponent must:
   (a) implement best practice management to minimise the construction, operational and road transportation noise of the development;
   (b) minimise the noise impacts of the project during meteorological conditions when the noise criteria in this approval do not apply;

(c) carry out attended noise monitoring (at least every 3 months or as otherwise agreed by the Secretary) to determine whether the project is complying with the relevant conditions of this approval; and
(d) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval

to the satisfaction of the Secretary.

Note: *Monitoring under this approval is not required at all residences and the use of representative monitoring locations can be used to demonstrate compliance with criteria, if agreed to by the Secretary.*

Noise Management Plan

5. Within three months of the approval of Modification 2, the Proponent must prepare a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must:
   (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;
   (b) be prepared in consultation with the EPA;
   (c) describe the measures to be implemented to ensure:
      (i) compliance with the noise criteria and operating conditions in this approval;
      (ii) best practice management is being employed;
      (iii) noise impacts of the project are minimised during noise-enhancing meteorological conditions;
   (d) describe the noise management system; and
   (e) include a monitoring program to be implemented to measure noise from the project against the noise criteria in Table 1, and which evaluates and reports on the effectiveness of the noise management system on site.

   The Proponent must implement the Noise Management Plan as approved by the Secretary.

AIR QUALITY

Impact Assessment Criteria

6. The Proponent must ensure that particulate matter emissions generated by the project do not cause exceedances of the criteria in Table 3 at any residence on privately-owned land.

Table 3: *Air quality criteria*

Pollutant	***Averaging Period***	***Criterion***	
Particulate matter < 10 µm (PM_{10})	Annual	[a,c] 30 µg/m^3	
	24 hour	[b] 50 µg/m^3	
Total suspended particulates (TSP)	Annual	[a,c] 90 µg/m^3	
[d] Deposited dust	Annual	[b] 2 g/m^2/month	[a] 4 g/m^2/month

Notes:
[a] *Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources).*
[b] *Incremental impact (i.e. incremental increase in concentrations due to the project on its own).*
[c] *Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary.*
[d] *Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.*

Air Quality Operating Conditions

7. The Proponent must:
   (a) implement best management practice to minimise the dust emissions of the project, including routinely watering haul roads being used by heavy vehicles and equipment;
   (b) regularly assess meteorological and air quality monitoring data to guide the day-to-day planning of operations and implementation of air quality mitigation measures to ensure compliance with the relevant conditions of this approval;
   (c) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see Note c to Table 3 above);
   (d) monitor and report on compliance with the relevant air quality conditions in this approval; and
   (e) minimise surface disturbance of the site, other than as permitted under this approval,
   to the satisfaction of the Secretary.

Air Quality Management Plan

7A. Within three months of the approval of Modification 2, the Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must:
   (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary;
   (b) be prepared in consultation with the EPA;
   (c) describe the measures to be implemented to ensure:
      (i) compliance with the air quality criteria and operating conditions in this approval;
      (ii) best practice management is being employed; and
      (iii) air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events;
   (d) describe the air quality management system; and
   (e) include an air quality monitoring program that:
      (i) is capable of evaluating the performance of the project against the air quality criteria;
      (ii) adequately supports the air quality management system; and
      (iii) includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and for notifying the Department and relevant stakeholders of these events.

   The Project must implement the Air Quality Management Plan as approved by the Secretary.

SOIL AND WATER

Discharges

8. Except as may be expressly provided for by an EPL, the Proponent must not discharge any water from the project or ancillary operational areas. The Proponent must ensure that the extraction pit subject to dredging is maintained and operated to prevent discharges of any surface water from these ponds.

Water Quality Objectives

9. The Proponent must aim to meet the water quality objectives in Table 4 for water in the dredge ponds and in groundwater adjacent the dredge ponds, unless otherwise approved by the Secretary.

Pollutant	*Unit of Measure*	*Water Quality Objectives*
Turbidity	NTU	5 - 20
pH	pH	6.5 – 8.5
Oil and Grease	mg/L	10
Salinity	µS/cm	<3,000
Dissolved oxygen	mg/L	>6
Chorophyll-a	µg/L	2-10

Faecal coliforms	Median No./100mL	<1000
Enterococci	Median No./100mL	<230
Algae and blue-green algae	No.cells/mL (M.aeruginosa)	<50,000
	mm^3/L (total biovolume)	<4
Sodium	mg/L	500
Potassium ion	mg/L	40
Magnesium ion	mg/L	100
Chloride ion	mg/L	1000
Sulphate ion	mg/L	800
Bicarbonate ion	mg/L	400
Soluble Iron ion	mg/L	20
Soluable aluminium ion	mg/L	0.5
Ammonium ion	mg/L	20

Table 4: Water Quality Objectives

Notes:

- *The objectives for dissolved oxygen, turbidity and algae are relevant to surface water only.*
- *The Department acknowledges that short term exceedances of these objectives may occur during natural events such as flooding.*
- *The Department acknowledges that pre-existing water quality may not meet the objectives for some analytes, including salinity. The proponent must strive to meet the water quality objectives through implementation of the Soil and Water Management Plan (see condition 18 below), as far as is reasonable and feasible and within the Proponent's control, to the satisfaction of the Secretary.*

Fines Management

10. The Proponent must ensure that all excavated potential acid sulfate soil fines material is returned back to below the watertable as soon as possible to prevent oxidation. No potential acid sulfate soil must be removed from the site, unless adequately neutralised in accordance with methods approved under the Soil and Water Management Plan.

11. The Proponent must ensure that all potential acid sulfate soil fines material is discharged into the pond at a depth of no less than 3 metres from the water surface, and that all fines are deposited to a final depth of at least 8 metres from the water surface, unless an alternative method(s) is approved by DoI and the Secretary.

Wastewater Treatment

12. The Proponent must manage on-site sewage to the satisfaction of Council and EPA. The facility must comply with the requirements of the *Environment and Health Protection Guidelines – On-site Sewage Management for Single Households (1998)*.

Flood Management

13. The Proponent must ensure that flood bunding around the Stage 1 and Stage 2 works does not exceed 300 mm in height above natural surface level, to a maximum height of 2.0 m AHD, unless otherwise approved by the Secretary.

14. The Proponent must ensure that perimeter drainage must be installed and operational prior to the construction of bunding or the placement of fill on site.

15. All earthworks, including flood and acoustic bunding works, must be contained wholly within the site.

16. The Proponent must cease dredging and processing activities not less than 24 hours prior to the commencement of overflow from any dredge pond. No dredging or processing must occur when the dredge ponds are overflowing.

17. The Proponent must ensure that the flood storage capacity of the site is no less than the pre-existing flood storage capacity at all stages of the project. Details of the available flood storage capacity must be reported in the Annual Review.

Management and Monitoring

18. The Proponent must prepare a Soil and Water Management Plan for the project to the satisfaction of the Secretary. This plan must:
    (a) be prepared in consultation with DoI and EPA;
    (b) include a:
        - Water Balance;
        - Erosion and Sediment Control Plan;
        - Acid Sulfate Soil Management Plan;
        - Blue-Green Algae Management Plan;
        - Surface Water Monitoring Program; and
        - Groundwater Monitoring Program; and
    (c) be submitted to the Secretary prior to starting quarrying operations, and prior to carrying out any development on the site in the case of the Erosion and Sediment Control Plan.

    The Proponent must implement the plan as approved by the Secretary.

19. The Water Balance must include:
    (a) details of all water extracted, transferred, used and/or discharged by the quarry;
    (b) the source of all water collected or stored on the site, including rainfall, stormwater and groundwater; and
    (c) measures to minimise water use by the project.

20. The Erosion and Sediment Control Plan must:
    (a) be consistent with the requirements of *Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004* (Landcom), and Council's codes including its *Code of Practice for Soil and Water Management on Construction Sites, Development Design Specification D7 – Stormwater Quality and Tweed Urban Stormwater Quality Management Plan*;
    (b) identify activities that could cause soil erosion and generate sediment;
    (c) describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters;
    (d) describe the location, function, and capacity of erosion and sediment control structures; and
    (e) describe what measures would be implemented to maintain these structures over time.

21. The Acid Sulfate Soil Management Plan must:
    (a) be consistent with the *NSW Acid Sulphate Soil Advisory Committee's Acid Sulfate Soil Manual*; and
    (b) define procedures for managing the potential acid sulfate soils on the site, including sample testing and procedures.

22. The Blue-Green Algae Management Plan must:
    (a) be prepared by a suitably qualified blue-green algae expert, whose appointment has been approved by the Secretary;
    (b) be consistent with extant guidelines for blue-green algae management including the NHMRC's *Guidelines for Managing Risks in Recreational Water*;
    (c) describe the measures that would be implemented to prevent and control the sources of algal blooms over the short, medium and long term; and
    (d) define procedures for the management and notification of identified algal blooms.

23. The Surface Water Monitoring Program must include:
    (a) detailed baseline data on surface water quality;
    (b) surface water impact assessment criteria;
    (c) a program to monitor surface water flows and quality;
    (d) a program to manage water releases from the site;

(e) a program to monitor bank and bed stability; and
(f) a protocol for the investigation, notification and mitigation of identified exceedances of the surface water impact assessment criteria.

24. The Ground Water Monitoring Program must include:
(a) detailed baseline data on groundwater levels and quality, based on statistical analysis;
(b) groundwater impact assessment criteria;
(c) a program to monitor ground water levels and quality;
(d) a program to monitor ground water level effects on vegetation, and on ground water supply to adjoining properties; and
(e) a protocol for the investigation, notification and mitigation of identified exceedances of the groundwater impact assessment criteria.

REHABILITATION AND LANDSCAPING

Rehabilitation and Revegetation

25. The Proponent must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the proposed rehabilitation activities described in the documents listed in condition 2 of Schedule 2 and comply with the objectives in Table 5.

***Table 5**: Rehabilitation Objectives*

Feature	Objective
All areas of the site affected by the project	• Safe • Hydraulically and geotechnically stable • Non-polluting • Fit for the intended post-quarrying land use/s • Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land
Surface infrastructure	• Decommissioned and removed, unless otherwise agreed by the Planning Secretary
Void lake	• Water retained on the site maintains long-term water quality objectives fit for the intended post-mining purpose • Water discharged from the site is suitable for receiving waters, aquatic ecology and riparian vegetation

26. The Proponent must:
(a) rehabilitate and revegetate the 15 ha hectares of land identified in the EA (see the revegetation plan in Appendix 2); and
(b) within 12 months of the commencement of quarrying operations, make suitable arrangements to provide appropriate long term security for the revegetation area to ensure it is managed for conservation purposes,
to the satisfaction of the Secretary.

Landscape Management Plan

27. The Proponent must prepare a Landscape Management Plan for the project to the satisfaction of the Secretary. This plan must:
(a) be prepared:
- by suitably qualified consultants, including a specialist hydrologist, coastal engineer, wetlands ecologist and landscape architect;
- in consultation with Council, DoI, OEH, DPI Fisheries and the CCC; and
- in accordance with extant guidelines including the DoI's *Constructed Wetlands Manual, Volumes 1 and 2* and the DPI's *Policy and Guidelines: Aquatic Habitat Management, 1999*;

(b) be submitted to the Secretary prior to starting quarrying operations on the site; and
(c) include a:

- Rehabilitation and Revegetation Management Plan; and
- Long Term Management Strategy.

The Proponent must implement the plan as approved by the Secretary.

Note: The Department accepts that the initial Landscape Management Plan may not include the detailed Long Term Management Strategy. However, a conceptual strategy must be included in the initial plan, along with a timetable for augmentation of the strategy with each subsequent review of the plan.

28. The Rehabilitation and Revegetation Management Plan must include:
    (a) the rehabilitation objectives for the site and revegetation areas;
    (b) a description of the short, medium, and long term measures that would be implemented to:
        - rehabilitate and stabilise the site;
        - implement the revegetation strategy; and
        - manage the remnant vegetation and habitat on the site and in the revegetation areas;
    (c) detailed performance and completion criteria for the rehabilitation and stabilisation of the site and implementation of the revegetation strategy;
    (d) a detailed description of how the performance of the rehabilitation of the quarry and the revegetation areas would be monitored over time to achieve the stated objectives;
    (e) a detailed description of what measures would be implemented over the next 5 years to rehabilitate and manage the landscape of the site and revegetation areas including the procedures to be implemented for:
        - progressively rehabilitating and stabilising areas disturbed by quarrying;
        - implementing revegetation and regeneration within the disturbance areas and revegetation areas;
        - protecting areas outside the disturbance areas, including SEPP 14 wetlands and SEPP 26 littoral rainforests;
        - vegetation clearing protocols;
        - managing impacts on fauna;
        - controlling terrestrial and aquatic weeds and pests;
        - controlling access;
        - bushfire management; and
        - reducing the visual impacts of the project;
    (f) a description of the potential risks to successful rehabilitation and/or revegetation, and a description of the contingency measures that would be implemented to mitigate these risks;
    (g) details of who is responsible for monitoring, reviewing, and implementing the plan; and
    (h) a monitoring and reporting program of the project's impacts on Koalas, including road strike, to the satisfaction of the Secretary; and
    (i) adaptive management options for managing impacts on Koalas, including specific impact triggers, developed in consultation with Council.

29. The Long Term Management Strategy must:
    (a) define the objectives and criteria for quarry closure and post-extraction management;
    (b) investigate options for the future use of the site;
    (c) describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the project; and
    (d) describe how the performance of these measures would be monitored over time.

Rehabilitation Bond

30. Prior to starting quarrying operations on the site, the Proponent must lodge a rehabilitation bond for the project with the Secretary. The sum of the bond must be calculated at:
    (a) $\$2.50/m^2$ for the total area to be disturbed and/or revegetated in each 5 year review period (see condition 31 below); and
    (b) $\$1.50/m^2$ for the total area of land previously disturbed and/or rehabilitated by the project,

    to the satisfaction of the Secretary.

Notes:
- *If the rehabilitation and revegetation works are completed to the satisfaction of the Secretary, the Secretary will release the rehabilitation bond.*

- *If the rehabilitation and revegetation works are not completed to the satisfaction of the Secretary, the Secretary will call in all or part of the rehabilitation bond, and arrange for the satisfactory completion of the relevant works.*

31. Within 6 months of each Independent Environmental Audit (see condition 6 of schedule 5) excluding the inaugural audit, unless the Secretary directs otherwise, the Proponent must review, and if necessary revise, the sum of the rehabilitation bond to the satisfaction of the Secretary. This review must consider:
    (c) the effects of inflation;
    (d) any changes to the total area of disturbance; and
    (e) the performance of the rehabilitation and revegetation to date.

ABORIGINAL CULTURAL HERITAGE

Aboriginal Cultural Heritage Management Plan

32. The Proponent must prepare an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Secretary. This plan must:
    (a) be prepared in consultation with OEH and all relevant Aboriginal communities;
    (b) be submitted to the Secretary for approval prior to commencement of construction; and
    (c) include a:
        - program for additional archaeological survey/s of the disturbance area;
        - description of the measures that would be implemented to salvage any identified Aboriginal sites within the disturbance area;
        - description of the measures that would be implemented to protect any Aboriginal sites outside the disturbance area; and
        - description of the measures that would be implemented if any new Aboriginal objects or skeletal remains are discovered during the project.

    The Proponent must implement the plan as approved by the Secretary.

TRAFFIC AND TRANSPORTATION

Road Haulage

33. Prior to commencement of operations the Proponent must:
    (a) design and construct the haul road and its intersection with Pottsville-Mooball Road; and
    (b) install advanced truck turning warning signage along Pottsville-Mooball Road,
    to the satisfaction of Council.

34. The Proponent must ensure that all loaded vehicles entering or leaving the site have their loads covered.

35. The Proponent must ensure all loaded vehicles leaving the site are cleaned of materials that may fall on the road before they are allowed to leave the site.

Road Maintenance

35A. Within 12 months of approval of Modification 2, unless otherwise agreed by the Secretary, the Proponent must implement and pay the full cost of implementing the recommended treatments listed in Table 3 of the *Independent Road Safety Audit* prepared by Bitzios Consulting and dated 16 October 2017, and outlined in the Proponent's *Response to Road Safety Audit* dated March 2018, to the satisfaction of Council, including any additional line marking and signage requested by Council.

Note: The Proponent must obtain all necessary approvals under section 138 of the Roads Act 1993 from Council before implementing the recommended treatments.

Traffic Management Plan

35B. The Proponent must prepare a Traffic Management Plan for the project to the satisfaction of the Secretary. This plan must:
    (a) be prepared in consultation with RMS and Council;

(b) be submitted to the Secretary for approval prior to the commencement of operations under Modification 2, unless otherwise agreed by the Secretary;
(c) describe the processes in place for the management of trucks entering and exiting the site;
(d) include a Drivers' Code of Conduct that details:
- safe and quiet driving practices that must be used by drivers travelling to and from the quarry;
- a map of the primary haulage routes highlighting critical locations for application of safe and quiet driving practices, including residential areas and school bus routes;
- an induction process for drivers and regular toolbox meetings;
- complaint resolution procedures;
- any community consultation measures in respect of peak haulage periods; and
- consideration of seasonal traffic and events;

(e) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct; and
(f) propose measures to minimise the transmission of dust and tracking of material onto public roads from vehicles leaving the site.

The Proponent must implement the plan as approved by the Secretary.

Parking

36. The Proponent must provide sufficient parking on-site for all project-related traffic and visitors, in accordance with Council's parking codes and to the satisfaction of the Secretary. No on street parking must be undertaken.

VISUAL IMPACT

Visual Amenity

37. The Proponent must minimise the visual impacts of the project to the satisfaction of the Secretary.

38. The Proponent must establish and subsequently maintain the vegetated buffer around the extraction area within 12 months of the date of this approval.

Note: The vegetation buffer must be detailed in the Landscape Management Plan.

Lighting Emissions

39. The Proponent must:
(a) take all practicable measures to mitigate off-site lighting impacts from the project; and
(b) ensure that all external lighting associated with the project complies with *Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting,*
to the satisfaction of the Secretary.

Advertising

40. The Proponent must not erect or display any advertising structure(s) or signs on the site without the written approval of the Secretary.

Note: This does not include business identification, traffic management and safety or environmental signs.

WASTE MANAGEMENT

41. The Proponent must minimise the amount of waste generated by the project to the satisfaction of the Secretary.

EMERGENCY AND HAZARDS MANAGEMENT

Dangerous Goods

42. The Proponent must ensure that the storage, handling, and transport of dangerous goods are conducted in accordance with the relevant *Australian Standards*, particularly AS1940 and AS1596, and the *Dangerous Goods Code*.

Safety

43. The Proponent must secure the project to ensure public safety to the satisfaction of the Secretary.

Bushfire Management

44. The Proponent must:
    (a) ensure that the project is suitably equipped to respond to any fires on-site; and
    (b) assist the rural fire service and emergency services as much as possible if there is a fire on-site.

PRODUCTION DATA

45. The Proponent must:
    (a) provide annual production data to the DRG using the standard form for that purpose; and
    (b) include a copy of this data in the Annual Review.

SCHEDULE 4
ADDITIONAL PROCEDURES

NOTIFICATION OF LANDOWNERS

1. If the results of monitoring required in schedule 3 identify that impacts generated by the project are greater than the relevant impact assessment criteria, then the Proponent must notify the Secretary, affected landowners, and/or existing or future tenants accordingly, and provide quarterly monitoring results to each of these parties until the results show that the project is complying with the relevant criteria.

INDEPENDENT REVIEW

2. If a landowner considers that the project is exceeding the impact assessment criteria in schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land.

   If the Secretary is satisfied that an independent review is warranted, the Proponent must within 3 months of the Secretary advising that an independent review is warranted:
   (a) consult with the landowner to determine his/her concerns;
   (b) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to conduct monitoring on the land, to determine whether the project is complying with the relevant criteria in schedule 3, and identify the source(s) and scale of any impact on the land, and the project's contribution to this impact; and
   (c) give the Secretary and landowner a copy of the independent review.

3. If the independent review determines that the project is complying with the relevant criteria in schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary.

4. If the independent review determines that the project is not complying with the relevant criteria in schedule 3, and that the project is primarily responsible for this non-compliance, then the Proponent must:
   (a) implement all reasonable and feasible measures, in consultation with the landowner, to ensure that the project complies with the relevant criteria; and
   (b) conduct further monitoring to determine whether these measures ensure compliance; or
   (c) secure a written agreement with the landowner to allow exceedances of the relevant criteria in schedule 3,

   to the satisfaction of the Secretary.

   If the additional monitoring referred to above subsequently determines that the project is complying with the relevant criteria in schedule 3, or the Proponent and landowner enter into a negotiated agreement to allow these exceedances, then the Proponent may discontinue the independent review with the approval of the Secretary.

5. If the landowner disputes the results of the independent review, either the Proponent or the landowner may refer the matter to the Secretary for resolution.

SCHEDULE 5
ENVIRONMENTAL MANAGEMENT AND MONITORING CONDITIONS

ENVIRONMENTAL MANAGEMENT

Environmental Management Strategy

1. The Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:
   (a) be submitted to the Secretary prior to starting quarrying operations on the site;
   (b) be prepared in consultation with the relevant agencies;
   (c) provide the strategic context for environmental management of the project;
   (d) identify the statutory requirements that apply to the project;
   (e) describe in general how the environmental performance of the project would be monitored and managed;
   (f) describe the procedures that would be implemented to:
      - keep the local community and relevant agencies informed about the construction, operation and environmental performance of the project;
      - receive, handle, respond to, and record complaints;
      - resolve any disputes that may arise during the life of the project;
      - respond to any non-compliance;
      - manage cumulative impacts; and
      - respond to emergencies;
   (g) describe the role, responsibility, authority, and accountability of the key personnel involved in the environmental management of the project; and
   (h) include:
      - reference to any strategies, plans and programs approved under the conditions of this approval; and
      - a clear plan depicting all the monitoring to be carried out under the conditions of this approval.

   The Proponent must implement the strategy as approved by the Secretary.

Management Plan Requirements

1A. The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include:
   (a) a summary relevant background or baseline data;
   (b) a description of:
      - the relevant statutory requirements (including any relevant approval, licence or lease conditions);
      - any relevant limits or performance measures/criteria; and
      - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures;
   (c) a description of the measures that to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;
   (d) a program to monitor and report on the:
      - impacts and environmental performance of the project; and
      - effectiveness of any management measures (see (c) above);
   (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;
   (f) a program to investigate and implement ways to improve the environmental performance of the project over time;
   (g) a protocol for managing and reporting any:
      - incidents;
      - complaints;
      - non-compliances with statutory requirements; and
      - exceedances of the impact assessment criteria and/or performance criteria; and
   (h) a protocol for periodic review of the plan.

Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.

Revision of Strategies, Plans & Programs

1B. Within 3 months of the submission of:
(a) an incident report under condition 4 below;
(b) an Annual Review under condition 5 below;
(c) an audit report under condition 6 below; and
(d) any modifications to this approval,

the Proponent must review the strategies, plans and programs required under this approval, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary.

Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the project.

ENVIRONMENTAL MONITORING PROGRAM

2. The Proponent must prepare an Environmental Monitoring Program for the project to the satisfaction of the Secretary. This program must be submitted to the Secretary prior to starting quarrying operations on the site, and consolidate the various monitoring requirements in schedule 3 of this approval into a single document.

INCIDENT REPORTING

3. Within 24 hours of detecting an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent must notify the Department and other relevant agencies of the exceedance/incident.

4. Within 6 days of notifying the Department and other relevant agencies of an exceedance/incident, the Proponent must provide the Department and these agencies with a written report that:
(a) describes the date, time, and nature of the exceedance/incident;
(b) identifies the cause (or likely cause) of the exceedance/incident;
(c) describes what action has been taken to date; and
(d) describes the proposed measures to address the exceedance/incident.

REGULAR REPORTING

4A. The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.

ANNUAL REVIEW

5. Within 12 months of the date of this approval, and annually thereafter, the Proponent must submit an Annual Review to the Secretary and relevant agencies. This report must:
(a) identify the standards and performance measures that apply to the project;
(b) describe the works carried out in the last 12 months;
(c) describe the works that will be carried out in the next 12 months;
(d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years;
(e) include a summary of the monitoring results for the project during the past year;
(f) include an analysis of these monitoring results against the relevant:
- impact assessment criteria/limits;
- monitoring results from previous years; and
- predictions in the documents listed in condition 2 of Schedule 2;

(g) identify any trends in the monitoring results over the life of the project;
(h) identify any non-compliance during the previous year; and
(i) describe what actions were, or are being, taken to ensure compliance.

INDEPENDENT ENVIRONMENTAL AUDIT

6. Within 2 years of the start of quarrying operations on site, and every 5 years thereafter, unless the Secretary directs otherwise, the Proponent must commission, commence and pay the full cost of an Independent Environmental Audit of the project. This audit must:
   (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Secretary;
   (b) include consultation with the relevant agencies;
   (c) assess the environmental performance of the project, and its effects on the surrounding environment;
   (d) assess whether the project is complying with the relevant standards, performance measures and statutory requirements;
   (e) review the adequacy of any strategy/plan/program required under this approval;
   (f) recommend measures or actions to improve the environmental performance of the project, and/or any strategy/plan/program required under this approval; and
   (g) be conducted and reported to the satisfaction of the Secretary.

7. Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Secretary, the Proponent 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, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.

Monitoring and Environmental Audits

8. Any condition of this approval 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 project to provide data on compliance with the approval or on the environmental impact of the project, and an "environmental audit" is a periodic or particular documented evaluation of the project to provide information on compliance with the approval or the environmental management or impact of the project.*

COMMUNITY CONSULTATIVE COMMITTEE

9. Prior to starting quarrying operations on the site, the Proponent must establish a CCC for the project. This CCC must be established and operated in accordance with the Department's *Community Consultative Committee Guidelines: State Significant Projects* (2016), and to the satisfaction of the Secretary.

   Notes:
   - *The CCC is an advisory committee only.*
   - *In accordance with the guidelines, the committee should comprise an independent chair and appropriate representation from the Proponent, Council and the local community.*

ACCESS TO INFORMATION

10. Within 1 month of the approval of any plan/strategy/program required under this approval (or any subsequent revision of these plans/strategies/programs), or the completion of any independent environmental audit or Annual Review, the Proponent must:
    (a) provide a copy of the relevant document/s to Tweed Shire Council and relevant agencies; and
    (b) ensure that a copy of the relevant document/s is made publicly available on site and/or at the Proponent's regional office,
    to the satisfaction of the Secretary.

11. For the life of the project, the Proponent 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;
- all approved strategies, plans and programs required under the conditions of this consent;
- a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;
- a complaints register, updated monthly;
- the Annual Reviews of the project;
- any independent environmental audit as described in condition 6 above, and the Proponent's response to the recommendations in any audit; and

(b) any other matter required by the Secretary; and

(c) keep this information up-to-date,

to the satisfaction of the Secretary.

APPENDIX 1
PROJECT SITE



APPENDIX 2
REHABILITATION STAGING PLAN



APPENDIX 3
STATEMENT OF COMMITMENTS

Amended Statement of Commitments

The following sections summaries the commitments by Ramtech Pty Ltd regarding mitigations and control measures to be implemented for the proposal:

Sand Extraction

- Additional resource assessment works are to be undertaken in respect of two (2) key elements, being the extent of resource available for brickies loam and the extent of resource available with respect of mineral sands. Such assessments are to be undertaken in accord with the matters raised by the Department of Primary Industries in correspondence dated 21st December 2007.
- Annual production data will be made available in accord with DPI requirements.
- Extraction of marine clay will not be undertaken
- Sand extraction below the watertable will be by suction dredge only. No dry extraction of sand will occur on site, with the exception of the initial overburden and brickies loam.
- Prior to commencement of extraction, the extent of the approved extraction areas shall be clearly and permanently marked by a licensed surveyor with survey posts.
- Fines will be re-interred approximately below the watertable at approximately 10m below NSL.

Sediment and Erosion Control

- A perimeter bund and catch drain shall be constructed around each dredge pond and processing areas. The bund is to be vegetated.
- Installation of sediment control fences at the downslope perimeter of cleared or disturbed land. These are to be functional before clearing commences.
- A negative grade will be maintained around the dredge ponds within the bunded perimeter.
- Additional Erosion and sediment control devices shall be installed on an 'as required' basis. Such measures will be installed in accordance with the "Soils and Construction Guidelines – Managing Urban Stormwater".
- Where practical, surface waters from undisturbed areas shall be diverted away from extraction/works areas.
- All processing areas will drain towards the onsite water bodies. No discharge of processing waters from the site shall occur under normal conditions (ie. Not flooded).
- Topsoil stripping will be undertaken in sub-stages of 1 hectare or less
- All existing ground cover around the site is to remain and be maintained to limit sediment and erosion.
- Any on-site stockpiles of commercial sand shall remain damp and will have appropriate sediment and erosion control devices installed at all times.
- Stockpiled topsoil shall be seeded so as to achieve adequate vegetation cover and sediment and erosion devices will be installed around all stockpiles at all times.
- No discharge of processing water from the site shall occur under normal conditions (ie. not flooded)

Surface Water Control & Quality

- Installation of surface and ground water monitoring devices as located on figure GJ0400.9.2 (Appendix Q)
- Surface water monitoring shall be undertaken in accordance with requirements as outlined with the draft EMP under Appendix G.

- All processing areas will drain towards the onsite water bodies. No discharge of processing waters from the site shall occur under normal conditions (ie. not flooded).
- Provision of reliable *in situ* monitoring equipment at all times for use by Quarry staff. This equipment will be calibrated at least monthly.
- All effluent generated will be pumped off site for treatment at Council facility.

Groundwater Movement and Quality

- Installation of ground water monitoring devices as located on figure GJ0400.8.1 (Appendix Q)
- Ground water monitoring shall be undertaken in accordance with the requirements as outlined within the draft EMP under Appendix G.
- Provision of reliable *in situ* monitoring equipment at all times for use by Quarry staff. This equipment will be calibrated at least monthly.
- All groundwater bores will be licensed by DIPNR.
- Dewatering from on site water bodies will not be undertaken
- Contour profiling of groundwater head data will be undertaken as part of site monitoring and reporting procedures.

Fuel Management and Land Contamination

- Fuel storage is to be contained within a bund area, and protected form the elements. Bunding will be sufficient to contain 110% of the volume of fuel storage.
- Operating procedures for containing and cleaning up oil spills on water to be established and implemented on site, with all staff to be trained in these procedures. Such measures are to form part of the site EMP.
- Products designed to contain and absorb oil spills on water will be available on site. Quantity and type of product will be monitored and will be available in sufficient quantities to deal with any potential spill on site.
- Materials stored on site will be limited to
  - One (1) month supply of diesel
  - Machine and equipment oils and grease
  - limited quantities of petrol

Air Quality

- The full length of internal haulage roadways will be sealed.
- A vegetation barrier for dust control along the southern boundary adjoining Warwick Park Road will be established (species and planting in accordance with rehabilitation plan, Appendix H).
- Topsoil stripping will be undertaken in sub-stages of 1 hectare of less.
- Topsoil stripping will not be undertaken on day with excess winds.
- All trucks entering/leaving the site shall be covered.
- Stockpiled topsoil shall be seeded so as to achieve adequate vegetation cover and sediment and erosion devices will be installed around all stockpiles.
- Any disturbed or unsealed movement areas will be watered by an onsite cart to ensure that such areas remain damp. Watering rates shall not be less than 2.5l/m^2/hour.

Noise

- Construction of a 4m high earth mound shielding the operational areas. This mound shall form part of the stockpile and be lightly top soiled, seeded and maintained with native grasses.

- The earth mound is to be constructed between 7.30am and 5pm. The occupants of the nearest dwellings to the site be notified as to the hours of operation for the mound construction, and be provided with a contact telephone number should they have concerns regarding noise from this stage of the operation;

- The bulldozer used to construct the earth barriers should be well maintained, and fitted with residential mufflers;

- Upon plant dredge pump selection, noise levels should be less than or equal to 88dB(A) at 1m from the plant. If this level is not achievable, further acoustic treatment in the form of a semi enclosure will be required to reduce source noise levels to within the acceptable range;

- Upon sand screening plant selection, noise levels should be less than or equal to 80dB(A) at 1m from the plant. If this level is not achievable, further acoustic treatment in the form of a semi enclosure will be required to reduce source noise levels to within the acceptable range;

- Haulage trucks and the wheeled loader should be well maintained, and fitted with residential mufflers;

- Internal haulage route and the crossover to Pottsville Road be as smooth as possible, and well maintained;

- Prior to commencement of operations, an acoustic test be conducted to ensure compliance with the noise limit criteria;

- All operations to be limited to 7am to 6pm, Monday to Friday, and 7am to midday, Saturdays.

Flora & Fauna

- A detailed regeneration and rehabilitation plan is to be prepared and approved by the DECCC prior to the issue of a construction certificate.
- Removal of existing weed species (particularly infestations of Bitou Bush and Lantana).
- Revegetation of disturbed areas within existing native vegetation communities with plants endemic to the locality. Revegetation areas will total approximately 15ha in area. No clearing of vegetation is required with the exception of approximately 20 Casuarina trees lining minor drainage channels in the extraction areas.
- Revegetation of nominated areas within the rehabilitation plan as attached under Appendix H to strengthen potential habitat corridors, extend the distribution of Swamp Sclerophyll and Littoral Rainforest environments and to extend the perimeter of the narrowest portions of the eastern forest to provide long-term mitigation against potential edge effects.
- A monitoring program will be implemented in respect of the rehabilitation areas external to the extraction areas. Such program will be subject to final approval by the DECCC and will contain consideration of additional rehabilitation / regeneration areas at the expense of implementation of the nest boxes. Consideration will also be given to strengthening corridor linkages where possible.
- Incorporation of potential foraging resources for threatened fauna species within landscaping/revegetation areas including:
  - *Allocasuarina littoralis, A. torulosa* for Glossy Black Cockatoos
  - Flowering species (Eucalypts, Corymbians, Melaleuca, Banksia) for flying fox/bat species
  - Littoral Rainforest fruiting species for Fruit-doves/Rainforest Pigeons
  - Favoured Eucalypts for Koalas
- Installation of nest boxes within the existing vegetation communities.

Waste

- All soil waste will be disposed of by licensed contractor in accordance with the *Protection of Environmental Operations Act 1997* (POEO Act 1997) & *Waste Minimisation Act 1995*.
- All solid wastes are to be managed in accord with the attached HMC Solid Waste Management Plan.
- Effluent will be treated on site in accord with the attached HMC report.

Flooding

- Adoption of a maximum 300mm bund height to all levels below 2m AHD.

Cultural Heritage

- The proponent will undertake additional archaeological surveys of the proposed extraction areas prior to works commencing to provide assurance that no aboriginal sites exist within the extraction areas
- If aboriginal sites are found within the extraction areas the proponent must undertake surveys / assessment to determine the cultural heritage values of the site and report how those values might be impacted upon and provide appropriate avoidance, mitigation or compensatory measures. Such additional assessments must be in accord with guidelines and requirements of the DECCC.

Views and Landscapes

- 5m to 10m vegetated buffers will be established around the extraction areas in accordance with the rehabilitation plan attached under Appendix H. The objectives of these areas are for visual protection primarily.
- A detailed rehabilitation plan will be prepared for those areas external to the extraction areas.

Monitoring, Reporting and Consultation

- Reporting and consultation measures will be implemented as outlined with the draft EMP under Appendix G.

Licensing

- The proponent will commit to gaining an Environmental Protection Licence from DECCC.

APPENDIX 4
Deleted

Appendix 3 Environment Protection Licence

Section 55 Protection of the Environment Operations Act 1997

Environment Protection Licence

Licence Details	
Number:	13077
Anniversary Date:	10-June

Licensee
HOLCIM (AUSTRALIA) PTY LTD
PO BOX 189
NORTH SYDNEY NSW 2059

Premises
Dunloe Park
Pottsville-Mooball Road
MOOBALL NSW 2483

Scheduled Activity (Act)	Licensing Fee Category (Regulation)	Scale
Extractive activities	Other extractive activities	> 100000 - 500000 T annually extracted or processed

Environment Protection Licence

Contact Us

NSW EPA
6 Parramatta Square
10 Darcy Street
PARRAMATTA NSW 2150
Phone: 131 555
Email: info@epa.nsw.gov.au
Locked Bag 5022
PARRAMATTA NSW 2124

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Information about this licence

Dictionary

A definition of terms used in the licence can be found in the dictionary at the end of this licence.

Responsibilities of licensee

Separate to the requirements of this licence, general obligations of licensees are set out in the Protection of the Environment Operations Act 1997 ("the Act") and the Regulations made under the Act. These include obligations to:

- ensure persons associated with you comply with this licence, as set out in section 64 of the Act;
- control the pollution of waters and the pollution of air (see for example sections 120 - 132 of the Act);
- report incidents causing or threatening material environmental harm to the environment, as set out in Part 5.7 of the Act.

Variation of licence conditions

The licence holder can apply to vary the conditions of this licence. An application form for this purpose is available from the EPA.

The EPA may also vary the conditions of the licence at any time by written notice without an application being made.

Where a licence has been granted in relation to development which was assessed under the Environmental Planning and Assessment Act 1979 in accordance with the procedures applying to integrated development, the EPA may not impose conditions which are inconsistent with the development consent conditions until the licence is first reviewed under Part 3.6 of the Act.

Duration of licence

This licence will remain in force until the licence is surrendered by the licence holder or until it is suspended or revoked by the EPA or the Minister. A licence may only be surrendered with the written approval of the EPA.

Licence review

The Act requires that the EPA review your licence at least every 5 years after the issue of the licence, as set out in Part 3.6 and Schedule 5 of the Act. You will receive advance notice of the licence review.

Fees and information to be sent to the EPA

For each licence fee period you must pay:

- an administrative fee; and
- a load-based fee (if applicable).

Usually, the licence fee period is the same as the reporting period.

The EPA publication "A Guide to Licensing" contains information about how to calculate your licence fees.

A licence subject to load-based licensing (LBL) requires an Annual Return to be submitted to the EPA, comprising a Statement of Compliance for Load Based Fee Calculation for each assessable pollutant required by the licence. The Annual Return must be submitted by the "due date", as defined in the dictionary at the end of the licence. Refer to the Annual Return reporting requirements under Section 6 "Reporting Conditions".

Transfer of licence

The licence holder can apply to transfer the licence to another person. An application form for this purpose is available from the EPA.

Public register and access to monitoring data

Part 9.5 of the Act requires the EPA to keep a public register of details and decisions of the EPA in relation to, for example:

- licence applications;
- licence conditions and variations;
- statements of compliance;
- load based licensing information; and
- load reduction agreements.

Under s320 of the Act application can be made to the EPA for access to monitoring data which has been submitted to the EPA by licensees.

This licence is issued to:

Licensee
HOLCIM (AUSTRALIA) PTY LTD
PO BOX 189
NORTH SYDNEY NSW 2059

subject to the conditions which follow.

1 Administrative Conditions

A1 What the licence authorises and regulates

A1.1 This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their Scheduled Activity (Act) classification, Licensing Fee Category (Regulation) classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.

Scheduled Activity (Act)	Licensing Fee Category (Regulation)	Scale
Extractive activities	Other extractive activities	> 100000 - 500000 T annually extracted or processed

A1.2 Notwithstanding A1.1, the scale of the land-based extractive activity authorised under this licence must not exceed 300,000 tonnes per annum, being the amount equivalent to the extraction limit approved by the Project Approval granted under Section 75J of the Environmental Planning and Assessment Act 1979 for Project Application 06_0030 on 24 November 2008 for the premises specified in A2.

A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
Dunloe Park
Pottsville-Mooball Road
MOOBALL NSW 2483
LOT //DP
Lot 162 DP 755721

A3 Other activities

A3.1 This licence applies to all other activities carried on at the premises, including:

Ancillary activity
crushing, grinding or separating

A4 Information supplied to the EPA

A4.1 Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence.

In this condition the reference to "the licence application" includes a reference to:
a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and
b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.

2 Discharges to Air and Water and Applications to Land

P1 Location of monitoring/discharge points and areas

P1.1 The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.

P1.2 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.
Water and Land

EPA Identification Number	Type of Monitoring Point	Type of Discharge Point	Location Description
1	Silt Pond discharge and monitoring point	Silt Pond discharge and monitoring point	South-west corner of Silt Pond. Refer to map titled 'Holcim Pty Ltd Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.
2	Dredge Pond discharge and monitoring point	Dredge Pond discharge and monitoring point	Southern most point of Dredge pond. Refer to map titled 'Holcim Pty

			Ltd Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.
3	Groundwater Monitoring - DLP1		Refer to map titled 'Holcim Pty Ltd Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.
4	Groundwater Monitoring - DLP3		Refer to map titled 'Holcim Pty Ltd Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.
5	Groundwater Monitoring - DLP5		Refer to map titled 'Holcim Pty Ltd Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.
6	Groundwater Monitoring - DLP6		Refer to map titled 'Holcim Pty Ltd Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.
7	Groundwater Monitoring - DLP7		Refer to map titled 'Holcim Pty Ltd

			Boundary Survey Dunloe Sands Pottsville Rd Pottsville, NSW' attached to Holcim email sent to EPA dated 20 February 2018.

3 Limit Conditions

L1 Pollution of waters

L1.1 Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.

L1.2 Exceedance of a quality limit specified in this licence for the discharge of TSS, pH or Oil and Grease from Point 1 or 2 or a volume limit for discharge from Point 1 or 2 is permitted if the discharge from Point 1 or 2 occurs solely as a result of rainfall at the premises exceeding a total of 82.5 millimetres over any consecutive five day period.

L2 Concentration limits

L2.1 For each monitoring/discharge point or utilisation area specified in the table/s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.

L2.2 Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.

L2.3 To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.

L2.4 Water and/or Land Concentration Limits

POINT 1,2

Pollutant	UOM	50 Percentile concentration limit	90 Percentile concentration limit	3DGM concentration limit	100 percentile concentration limit
pH	pH				6.5 - 8.5
Oil and Grease	Visible				nil

TSS	milligrams per litre				50

L2.5 The concentration limits in the table above do not apply to any discharge from the sediment pond(s) solely arising from a rainfall event exceeding 82.5 mm (the 90 percentile 5 day rain event) in total falling over any consecutive five day period.

L3 Waste

L3.1 The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.

L4 Noise limits

L4.1 Noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of 48 dB(A), except as expressly provided by this licence.

L4.2 Noise from the premises is to be measured at the nearest noise sensitive location to determine compliance with this condition.

L4.3 The noise emission limits identified in this section apply under calm meteorological conditions of wind speeds up to 3m/s at 10 metres above ground level, and temperature inversion conditions.

Note: The modification factors presented in Fact Sheet C of the NSW EPA Noise Policy for Industry 2017 shall also be applied to the measured noise level where applicable.

Note: Noise sensitive locations means buildings used as a residence, hospital, school, childcare centre, places of public worship and nursing homes. A noise sensitive location includes the land within 30m of the building.

L5 Hours of operation

L5.1 Activities covered by this licence must only be carried out between the hours of 0700 hrs to 1700 hrs Monday to Friday, and 0700 hrs to 1200 hrs Saturday, and at no time on Sundays and Public Holidays.

L5.2 Exemptions to standard construction hours

a) any maintenance work that is inaudible from neighbouring residences;
b) emergency work to avoid the loss of lives or property, and/or to prevent environmental harm.

4 Operating Conditions

O1 Activities must be carried out in a competent manner

O1.1 Licensed activities must be carried out in a competent manner.
This includes:
a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and
b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.

O2 Maintenance of plant and equipment

O2.1 All plant and equipment installed at the premises or used in connection with the licensed activity:
a) must be maintained in a proper and efficient condition; and
b) must be operated in a proper and efficient manner.

O3 Dust

O3.1 All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.

O4 Processes and management

O4.1 Any pond subject to dredging, or containing turbid water due to recent dredging must be maintained and operated to prevent discharges of any water from these ponds. A vegetated barrier must be used at all times to ensure that the active dredge and fines placement area / pond are isolated from stormwater drainage channels.

O4.2 The licensee must maximise the diversion of run-on waters from lands upslope and around the site whilst land disturbance activities are being undertaken.

O4.3 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.

O4.4 The licensee must ensure that sampling point(s) for water discharged from the Silt Pond(s) or Dredge Pond(s) are provided and maintained in an appropriate condition to permit:
a) the clear identification of each Dredge Pond and Sediment Dam and discharge point(s);
b) the collection of representative samples of the water discharged from the Silt Pond(s) and Dredge Pond(s); and,
c) access to the sampling points(s) at all times by an authorised officer of the EPA.

O4.5 The licensee must maximise the diversion of stormwater runoff containing suspended solids to sediment basins installed on the premises.

O4.6 All liquid chemicals, fuels and oils must be stored in tanks or containers inside suitable bund(s). Bund(s) are to be designed, constructed and maintained in accordance with the relevant Australian Standard for the Storage and Handling of Flammable and Combustible Liquids.

O5 Other operating conditions

O5.1 The licensee must assess and manage any acid sulfate soil (ASS) and potential acid sulfate soil PASS) in accordance with the 1998 *Acid Sulfate Soils Manual* published by the NSW Acid Sulfate Soil Management Advisory Committee (ASSMAC).

5 Monitoring and Recording Conditions

M1 Monitoring records

M1.1 The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.

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.

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 EPA point identification number for the point at which the sample was taken; and
d) the name of the person who collected the sample

M2 Requirement to monitor concentration of pollutants discharged

M2.1 For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:

M2.2 Water and/ or Land Monitoring Requirements

POINT 1,2

Pollutant	UOM	Frequency	Sampling Methods
Oil and Grease	Visible	Special Frequency 1	Visual Inspection
pH	pH	Special Frequency 1	Probe
TSS	milligrams per litre	Special Frequency 1	Grab sample

POINT 3,4,5,6,7

Pollutant	UOM	Frequency	Sampling Methods
Ammonia	milligrams per litre	Yearly	Grab sample
Chloride	milligrams per litre	Yearly	Grab sample
Electrical conductivity	microsiemens per centimetre	Yearly	Grab sample
Oil and Grease	milligrams per litre	Yearly	Grab sample
pH	pH	Yearly	Grab sample
Standing Water Level	metres (Australian Height Datum)	Yearly	No method specified
Sulfate	milligrams per litre	Yearly	Grab sample

M2.3 Special Frequency 1 means: sampling once <24 hours prior to; and, sampling the discharge daily during, each discharge event arising from rainfall of less than 82.5mm falling in total over a period of up to five days duration.

M3 Testing methods - concentration limits

M3.1 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

M4 Environmental monitoring

M4.1 The licensee is required to install and maintain a rainfall depth measuring device.

M4.2 Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.

M4.3 The rainfall monitoring data collected in compliance with Condition M4.2 can be used to determine compliance with L1.2.

M5 Recording of pollution complaints

M5.1 The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.

M5.2 The record must include details of the following:
a) the date and time of the complaint;

b) the method by which the complaint was made;
c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
d) the nature of the complaint;
e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
f) if no action was taken by the licensee, the reasons why no action was taken.

M5.3 The record of a complaint must be kept for at least 4 years after the complaint was made.

M5.4 The record must be produced to any authorised officer of the EPA who asks to see them.

M6 Telephone complaints line

M6.1 The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.

M6.2 The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.

M6.3 The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.

M7 Other monitoring and recording conditions

M7.1 For the purposes of monitoring for compliance with the noise limit conditions of this licence (condition L4) noise emitted from the premises must be measured or computed at 30 metres from the nearest residential dwelling/s over a period of 15 minutes using the "FAST" response on the sound level meter. A modifying factor correction must be applied for tonal, impulsive, or intermittent noise in accordance with the document Noise Policy for Industry (NSW EPA, 2017).

6 Reporting Conditions

R1 Compliance, and annual reporting requirements

Compliance with licence conditions

R1.1 The licensee must supply the EPA, via the EPA's online digital portal, the following details of any non-compliance with the conditions of the licence within 21 days after the licensee becomes aware of the non-compliance:

a. the date the licensee became aware of the non-compliance;
b. the date(s) the non-compliance occurred, including if the non-compliance is continuing;
c. whether the non-compliance relates to air, water/land, noise or waste matters (if applicable);
d. whether the non-compliance relates to a pollution incident;
e. the licence condition(s) not complied with;
f. a summary of particulars of the non-compliance, including (if known):
    i. the location where the non-compliance occurred;
    ii. the duration of the non-compliance;

iii. if the non-compliance is continuing, the suspected end date of the non-compliance;
g. the cause or suspected cause of the non-compliance;
h. any action taken, or proposed to be taken, to mitigate the effects of the non-compliance; and
i. any action taken, or proposed to be taken, to prevent a recurrence of the non-compliance.

R1.2 The EPA may make a written request for further details in relation to each non-compliance reported in accordance with Condition R1.1. The licensee must provide such further details to the EPA, via the EPA's online digital portal, within the time specified in the request.

R1.3 Condition R1.1 does not apply where a non-compliance with a licence condition has been identified by the EPA as part of an EPA environmental compliance audit.

Reporting transition arrangements

R1.4 By 05 August 2026, the licensee must supply to the EPA, via the EPA's online digital portal the details required in Condition R1.1 for any non-compliance with the conditions of the licence that occurred:

i. after the date the licensee supplied their last Statement of Compliance - Licence Conditions to the EPA, and
ii. before the date of the notice of variation of licence that added this condition to this Licence.

Pollution monitoring data summary

R1.5 If the licensee undertakes monitoring as a result of a licence condition, the licensee must supply to the EPA a summary of the results of the pollution monitoring data in respect of each reporting period. The summary must be provided as a Microsoft Excel file, formatted with the following column headings:

a. EPA point identification number;
b. pollutant;
c. unit of measure;
d. number of samples required;
e. number of samples collected and analysed;
f. lowest sample value;
g. mean of sample values; and
h. highest sample value.

The pollution monitoring data summary for the reporting period must be supplied to the EPA via the EPA's online digital portal by the "due date", as defined in the dictionary at the end of this licence.

R2 Reporting documents

R2.1 The licensee must also include the following information with the Annual Return:

- A statement detailing the total volume of material extracted from the quarry for the reporting period; and
- The total volume of extracted material transported from the premises for the reporting period.

R3 Notification of environmental harm

R3.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R3.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which they became aware of the incident.

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.

R4 Written report

R4.1 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.

R4.2 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.

R4.3 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.

R4.4 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.

7 General Conditions

G1 Copy of licence kept at the premises or plant

G1.1 A copy of this licence must be kept at the premises to which the licence applies.

G1.2 The licence must be produced to any authorised officer of the EPA who asks to see it.

G1.3 The licence must be available for inspection by any employee or agent of the licensee working at the premises.

Dictionary

General Dictionary

3DGM [in relation to a concentration limit]	Means the three day geometric mean, which is calculated by multiplying the results of the analysis of three samples collected on consecutive days and then taking the cubed root of that amount. Where one or more of the samples is zero or below the detection limit for the analysis, then 1 or the detection limit respectively should be used in place of those samples
Act	Means the Protection of the Environment Operations Act 1997
activity	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
actual load	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2022
AM	Together with a number, means an ambient air monitoring method of that number prescribed by the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.
AMG	Australian Map Grid
anniversary date	The anniversary date is the anniversary each year of the date of issue of the licence. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.
Approved Methods Publication	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2022
assessable pollutants	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2022
BOD	Means biochemical oxygen demand
CEM	Together with a number, means a continuous emission monitoring method of that number prescribed by the *Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales*.

COD	Means chemical oxygen demand
composite sample	Unless otherwise specifically approved in writing by the EPA, a sample consisting of 24 individual samples collected at hourly intervals and each having an equivalent volume.
cond.	Means conductivity
due date	Means: i) not later than 60 days after the end of each reporting period; or ii) in the case of a transferring licence - not later than 60 days after the date the transfer was granted.
environment	Has the same meaning as in the Protection of the Environment Operations Act 1997
environment protection legislation	Has the same meaning as in the Protection of the Environment Administration Act 1991
EPA	Means the Environment Protection Authority of New South Wales.
EPA Online digital portal	Means eConnect EPA
general solid waste (non-putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
flow weighted composite sample	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
general solid waste (putrescible)	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
grab sample	Means a single sample taken at a point at a single time
hazardous waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
licensee	Means the licence holder described at the front of this licence
Licensing Fee Category (Regulation)	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2022.
load calculation protocol	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2022

local authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
material harm	Has the same meaning as in section 147 of the Protection of the Environment Operations Act 1997
MBAS	Means methylene blue active substances
Minister	Means the Minister administering the Protection of the Environment Operations Act 1997
mobile plant	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
motor vehicle	Has the same meaning as in the Protection of the Environment Operations Act 1997
O&G	Means oil and grease
Percentile [in relation to a concentration limit of a sample]	Means that percentage [eg.50%] of the number of samples taken that must meet the concentration limit specified in the licence for that pollutant over a specified period of time. In this licence, the specified period of time is the Reporting Period unless otherwise stated in this licence.
plant	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
pollution incident	Has the same meaning as in the Protection of the Environment Operations Act 1997
Pollution of waters [or water pollution]	Has the same meaning as in the Protection of the Environment Operations Act 1997
premises	Means the premises described in condition A2.1
public authority	Has the same meaning as in the Protection of the Environment Operations Act 1997
regional office	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
reporting period	For the purposes of this licence, the reporting period means the period of 12 months after the issue of the licence, and each subsequent period of 12 months. In the case of a licence continued in force by the Protection of the Environment Operations Act 1997, the date of issue of the licence is the first anniversary of the date of issue or last renewal of the licence following the commencement of the Act.

restricted solid waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
scheduled activity	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
special waste	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
TM	Together with a number, means a test method of that number prescribed by the Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales.
TSP	Means total suspended particles
TSS	Means total suspended solids
Type 1 substance	Means the elements antimony, arsenic, cadmium, lead or mercury or any compound containing one or more of those elements
Type 2 substance	Means the elements beryllium, chromium, cobalt, manganese, nickel, selenium, tin or vanadium or any compound containing one or more of those elements
utilisation area	Means any area shown as a utilisation area on a map submitted with the application for this licence
waste	Has the same meaning as in the Protection of the Environment Operations Act 1997
waste type	Means liquid, restricted solid waste, general solid waste (putrescible), general solid waste (non - putrescible), special waste or hazardous waste
wellhead	Has the same meaning as in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2022

Stephen Beaman

Executive Director Regulatory Operations

NSW Environment Protection Authority

End Notes

Licence varied by notice POEO-1769, issued on 05-06-2026

Licence varied by notice 1599399 issued on 20-Oct-2020

Licence varied by notice 1552463 issued on 20-Feb-2018

Licence transferred through application 1547043 approved on 19-Dec-2016 , which came into effect on 30-Dec-2016

Licence varied by notice 1531255 issued on 11-Jun-2015

Licence varied by notice 1522252 issued on 03-Jun-2014

Licence varied by notice 1510788 issued on 20-Dec-2012

Appendix 4 Independent Audit Declaration Form

Project name	Dunloe Park Sand Project
Consent	PA 06_0030
Description of project	Extractive industries
Site Address	Pottsville Rd, Pottsville NSW 2485
Proponent	Holcim Australia Pty Ltd as lessee of Ramtech Pty Ltd
Date	12 October 2026

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 Post Approval Requirements (IAPAR 2026).

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; and

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.

Notes:

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

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

Auditor Name	Annabelle Tungol
Signature	
Qualifications	Master Environmental Auditor (Exemplar Global) Certificate No. 119536 Bachelor of Science in Chemical Engineering 1998
Company	Artea Green Ventures for 4Pillars Environmental Consulting

Appendix 5 Audit Table

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	2	1	OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT	In addition to meeting the specific performance measures and criteria established under this approval, the Proponent must implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise any material harm to the environment that may result from the construction and operation of the project, and any rehabilitation required under this approval.	1.01, 1.02, 1.03, 7.01-7.15, 8.01-8.05, 9.01-9.06, 10.01-10.09	Monitoring results generally met applicable criteria, no incidents involving material environmental harm were identified, and the site inspection found no evidence of material harm. The isolated non-compliances identified elsewhere in this audit are administrative or monitoring-frequency matters and do not indicate material environmental harm. Accordingly, this condition is considered compliant.	Compliant	NA	NA
PA_06_0030	2	2	TERMS OF APPROVAL	The Proponent must carry out the project generally in accordance with the: (a) EA, EA (MOD 1) and EA (MOD 2); and (b) Statement of Commitments. *Notes:* *- The general layout of the project is shown in Appendix 1; and* *- The Statement of Commitments is reproduced in Appendix 3.*	12.01, 12.02, 12.03, 12.04, 1.01, 1.02, 1.03, 2.01, 2.02, 8.01-8.05, 13.01	Site inspection observations, aerial imagery, survey information and Annual Reviews indicate that the project layout, extraction activities and environmental management arrangements are generally consistent with those approval documents and the Statement of Commitments (see Section 5.10 of the audit report). No material departure from the approved project was identified during the audit period. Accordingly, this condition is considered compliant.	Compliant	NA	NA
PA_06_0030	2	2A	TERMS OF APPROVAL	The Proponent must carry out the project in accordance with the conditions of this approval.	1.01, 1.02, 1.03, 4.02-4.07, 7.01-7.15, 8.01-8.05, 9.01-9.06, 10.01-10.09, 13.01	The multiple lines of evidence available confirm that the project was carried out substantially in accordance with the approval. Specific minor non-compliances relating to missed dust monitoring, the on-site sewage approval, evidence of management-plan reviews and timing of the 2021 audit submission are recorded against the relevant conditions and should be addressed separately. These isolated findings do not demonstrate a general failure to carry out the project in accordance with the approval. Accordingly, this overarching condition is considered compliant.	Compliant	NA	NA
PA_06_0030	2	3	TERMS OF APPROVAL	If there is any inconsistency between the documents referred to above, the conditions of this approval shall prevail to the extent of any inconsistency.	1.03, 1.02, 1.01	No significant inconsistencies have been identified during this audit.	Not triggered	NA	NA
PA_06_0030	2	4	TERMS OF APPROVAL	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with the conditions of this approval; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the conditions of this approval; and (c) the implementation of any actions or measures contained in these documents.	4.02, 8.04, 8.05	The Department's response to the 2023 Annual Review directed Holcim to split out Incidents and Non-compliances in future Annual Reviews. The 2024 AR acknowleged this requirement and referred to sections 6 and 12. 2025 did not explicitly reference the requirement but followed the same format at 2024. Section 6 (Environemental Performance) notes and discusses non-compliances where they occur. Section 12 continues to be referenced as 'Incidents and Non-compliances'. In 2024, section 12 lists invalidated dust samples and 2025 also lists invalidated dust results. An 'Incident' is defined in the Consent. A missed measurement is not an 'incident' and should be reported as a non-compliance only. Although the Department's direction has been acknowledged and complied with, in that a change has been made to future reports, the response could be improved. No other directions or requests have been identified. The previous audit identified this condition as non-compliant on the basis of previous audit recommendations not being implemented. This audit team's view of this condition is that unless the Secretary has instructed Holcim to implement the findings of previous audits, non completion of previous recommendations would not trigger a non-compliance with this particular condition. We are not aware of any such specific instruction from the Planning Secretary following the 2021 audit.	Compliant	Section 12 should be revised in future Annual Reviews to be titled 'Incidents' and the corresponding table should contain Incidents as defined in the Consent only. A separate table in Section 6 or elsewhere could be used for tabulating non-compliances that do not meet the criteria for an 'Incident'. The Department has specified that missed measurements are not 'incidents'. Refer to the latest version of the Post Approval Compliance Reporting Guideline (March 2026 at the time of writing).	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	2	5	LIMITS ON APPROVAL	Sand extraction operations may take place until 1 January 2035. *Note: Under this Approval, the Proponent is required to rehabilitate and revegetate the site to the satisfaction of the Secretary. Consequently this approval will continue to apply in all other respects other than the right to conduct quarrying operations until the site has been rehabilitated and revegetated to a satisfactory standard.*	1.01, 1.02	Sand extraction operations are within the timeframe specified in this Condition.	Compliant	NA	NA
PA_06_0030	2	6	LIMITS ON APPROVAL	The Proponent must not extract to a depth of more than 12 m below the natural ground surface. *Note: The Department acknowledges that this limit may have a variance of +/- 1m.*	1.03, 2.02	Propellar system for the Site observed during inspection, which shows Site boundaries, other key features and multiple layers of topgraphy and bathymetry, with all surveys loaded into the database for review. The most recent survey was observed. Survey confirms 12 m bgl limit not exceeded. The most recent (2025) survey indicates a small area of the dredge pond is at 12-12.3 m depth. Noting the +/- 1 m variance on this condition, the hard limit of 13 m bgl has not ben exceeded.	Compliant	NA	NA
PA_06_0030	2	7	LIMITS ON APPROVAL	The Proponent must not transport more than 300,000 tonnes of quarry products in any financial year from the site.	8.05, 1.03, 7.14, 8.01, 8.02, 8.03, 8.04	Section 4.4 of the 2025 Annual Review presents data for the total product distributed from the Quarry annually during the Audit Period, as follows: 2021: 127,515 t 2022: 175,010 t 2023: 153,044 t 2024: 137,445 t 2025: 157,740 t 2026 YTD is projected to be <160,000 t. Weighbridge data sighted during inspection. The Site continues to operate well within its permitted throughput limit. The average daily trucks for 2026 has been 19 JAN, 22 FEB, 23 MAR, 21 APR, 13 MAY, 20 JUN. Improvements underway include an AI camera coming in for tracking trucks. To date its been a manual process. A live tracking function is being trialled at the moment, which will alert managers if a Site is getting close to truck or tonnage limites. Being trialled at the moment and if successful will be rolled out, including at Dunloe.	Compliant	NA	NA
PA_06_0030	2	8	LIMITS ON APPROVAL	The Proponent must ensure that heavy vehicle movements (in and out) associated with the project do not exceed 24 per hour.	1.03, 1.03, 7.14, 8.01, 8.02, 8.03, 8.04, 7.12, 7.13	Daily truck sheets are manually entered by Holcim. Truck sheet samples for 2024 and 2025 observed during inspection. Hourly truck numbers are generally <7-8. Daily truck numbers typically around 15-25. Truck numbers are limited by the loading capacity of plant on Site and based on observations it would not be physically possible to breach 24 per hour with one front end loader and typical loading time.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	2	9	STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS	With the approval of the Secretary, the Proponent may: (a) prepare and submit any strategy, plan or program required by this approval on a staged basis (if a clear description is provided as to the specific stage and scope of the project to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); (b) combine any strategy, plan or program required by this approval (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); and (c) update any strategy, plan or program required by this approval (to ensure the strategies, plans and programs required under this approval are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the project)	1.03, 2.01	No Management Plans or strategies are staged. The project itself identifies two 'Stages' and the current operations are within Stage 1. Stage 2 relates to a second dredge pit to be opened at a later date. Despite this, no plans are 'staged' as per the intent of this condition in that they have been prepared in full for the current scope of works and will be revised in full at such time as Stage 2 of the project commences.	Not triggered	NA	NA
PA_06_0030	2	9A	STAGING, COMBINING AND UPDATING STRATEGIES, PLANS OR PROGRAMS	If the Secretary agrees, a strategy, plan or program may be staged or updated without consultation being undertaken with all parties required to be consulted in the relevant condition in this approval.	1.03, 2.01	As above, no plans or strategies are staged.	Not triggered	NA	NA
PA_06_0030	2	9B	APPLICATION OF EXISTING STRATEGIES, PLANS OR PROGRAMS	The Proponent must continue to apply existing management strategies, plans or monitoring programs approved prior to the approval of Modification 2, until the approval of a similar plan, strategy or program following the approval of Modification 2.	10.01, 10.02, 10.03, 10.04, 10.05, 10.06, 10.07, 10.09	Modification 2 was approved in November 2018, prior to this Audit Period. All management strategies, plans, and monitoring programs implemented during the Audit Period were approved following the approval of Modification 2 (2019 or later).	Not triggered	NA	NA
PA_06_0030	2	10	STRUCTURAL ADEQUACY	The Proponent 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 Proponent 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 project.*	8.01, 8.02, 8.03, 8.04, 8.05, 14.05, 14.06, 14.07, 14.08, 14.09, 14.1	No new buildings and structures were constructed or altered during majority of the Audit Period, as reported in Section 8.1 of the 2021-2024 Annual Reviews. The audit interview and inspection also confirmed this was the case for 2026 YTD. The previous sand washing plant was decommissioned in 2025 and the new sand washing plant was installed in early 2025 and completed in October 2025. The wash plant was installed in the same general location as the previous plant (25 m south). Industrial plants that are not buildings and are not Class 10b structures fall outside the technical remit of the NCC (BCA). Based on discussion and documentation provided by Holcim, the wash plant was installed in accordance with manufacturer specifications and relevant australian standards. No construction or occupation certificate is required as the structure is not a 'building work or building' that requires certification under the EP&A Regulation. The EP&A Regulation also does not specify that such a structure requires a compliance certificate. However, an occupation certificate was obtained (document 14.06) and all relevant engineering documents have been provided to the audit team. Electrical and structural certificates have also been provided.	Compliant	NA	NA
PA_06_0030	2	11	DEMOLITION	The Proponent must ensure that all demolition work is carried out in accordance with *AS 2601-2001: The Demolition of Structures* , or its latest version.	8.01, 8.02, 8.03, 8.04, 8.05	The previous wash plant was decommissioned in early 2025. Demolition was carried out in accordance with contractor SWMS and the requirements of AS2601.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	2	12	OPERATION OF PLANT AND EQUIPMENT	The Proponent 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.	1.01, 1.02, 1.03	All plant was observed to be operating in a proper an efficient manner and no contrary evidence has been encountered in the review of previous information related to the audit period. All mobile plant appeared to be well maintained, with no leaks or damage visible. The dredge had been recently upgraded. Fuel lines and pipework was all in good operating condition with no leaks or breaks identified. Equipment and critical spares were available on Site. The new wash plant was operating at the time of the inspection and was observed to be relatively quiet and free of damage, leaks or other evidence of poor operation. Maintenance records and pre-start documents were observed on Site.	Compliant	NA	NA
PA_06_0030	2	13	ROAD MAINTENANCE CONTRIBUTIONS	Prior to increasing heavy vehicle movements (in and out) above eight per hour, the Proponent must pay Council $182,280 in accordance with Council's Tweed Road Contribution Plan, unless a deferred payment agreement is executed under Council's Business Investment Policy, in which case contributions are to be paid in accordance with that agreement.	14.11, 14.12, 14.13, 14.14, 1.03	A deferred payment plan was agreed and payment were made in six installments of $30,380 over six years. The sixth and final pyment was paid in 2025.	Compliant	NA	NA
PA_06_0030	2	14	COMPLIANCE	The Proponent must ensure that all employees, contractors and sub-contractors are made aware of, and instructed to comply with, the conditions of this approval relevant to their respective activities.	1.03	Due to the low number of staff who are required to run the Site, the Site induction is the primary means of training and communicating environmental controls. Evidence indicates that site personnel receive induction and training covering vehicle movement requirements, incident reporting, emergency response procedures and environmental responsibilities, including the consequences of non-compliance. Signage and other phsyical controls supplement training by creating physical reminders or barriers to help staff comply with requirements.	Compliant	NA	NA
PA_06_0030	2	15	EVIDENCE OF CONSULTATION	Where consultation with any public authority is required by the conditions of this approval, the Proponent must: (a) consult with the relevant public authority prior to submitting the required document to the Secretary for approval; (b) submit evidence of this consultation as part of the relevant document; and (c) describe how matters raised by the authority have been addressed and any matters not resolved.	10.03, 10.04, 10.08, 10.09, 10.1	The SWMP, LMP, EMS and EMP were the only management plans revised during the audit period. Review of each of these plans confirms that the consultation with agencies required by each requisite consent condition has been completed and documented in the management plan. DPHI has endorsed/approved these revised plans.	Compliant	NA	NA
PA_06_0030	3	1	GENERAL EXTRACTION AND PROCESSING PROVISIONS - Identification of Boundaries	Within 1 month of the date of approval of the Landscape Management Plan (see condition 27 below), the Proponent must: (a) engage a registered surveyor to mark out the boundaries of the approved limits of extraction; (b) submit a survey plan of these boundaries to the Secretary; and (c) ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits. *Note: The limit of extraction includes the area described in the EA and shown conceptually on the plan in Appendix 1.*	13.02, 10.04, 1.03	The original approval falls outside this audit period. This condition was noted as complied with in the 2016 IEA. The 2022 LMP update did not change the boundary of the Site or approved limit of extraction and hence no update is necessary.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	2	NOISE - Impact Assessment Criteria	The Proponent must ensure that the noise generated by the project does not exceed the criteria in Table 1 at any residence on privately-owned land. Noise generated by the project must be monitored and measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the *NSW Noise Policy for Industry* (EPA, 2017). The noise criteria in Table 1 do not apply if the Proponent has an agreement with the owner/s of the relevant residence or land to exceed the noise criteria, and the Proponent has advised the Department in writing of the terms of this agreement	7.01, 0.02, 7.03, 7.04, 7.05, 7.15, 7.16	Quarterly noise monitoring was conducted throughout the Audit Period. Quarterly Noise Monitoring Reports showed compliance with the criteria during all monitoring sessions. There is no evidence of missed noise monitoring, noise exceedances, or noise-related non-compliances. Quarterly attended noise monitoring indicates that quarry noise emissions met the applicable criteria at all monitored receivers and were generally inaudible. Even when quarry operations were audible (for example a bulldozer in July 2023), the estimated quarry contribution remained below the approved limits.	Compliant	NA	NA
PA_06_0030	3	3	NOISE - Hours of Operation	The Proponent must comply with the operating hours in Table 2.	8.01, 8.02, 8.03, 8.04, 8.05	Section 4.4 of the 2021-2025 Annual Reviews report that all activities during the reporting period took place within the approved operating hours. G-tick operating hours are noted on outbound records. Records inspected on Site, including dockets and spreadsheet. Site Staff have a good awareness of operating hours. Signage and Site closure procedures also contribute to maintaining compliance. No complaints or other evidence contrary to observations.	Compliant	NA	NA
PA_06_0030	3	4	NOISE - Noise Operating Conditions	The Proponent must: (a) implement best practice management to minimise the construction, operational and road transportation noise of the development; (b) minimise the noise impacts of the project during meteorological conditions when the noise criteria in this approval do not apply; (c) carry out attended noise monitoring (at least every 3 months or as otherwise agreed by the Secretary) to determine whether the project is complying with the relevant conditions of this approval; and (d) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval to the satisfaction of the Secretary. *Note: Monitoring under this approval is not required at all residences and the use of representative monitoring locations can be used to demonstrate compliance with criteria, if agreed to by the Secretary.*	7.01, 0.02, 7.03, 7.04, 7.05	a) Quarterly Noise Monitoring Reports showed compliance with noise criteria and no noise-related complaints were received during the Audit Period. As such, this condition is considered complied with. b) Meteorological conditions were discussed in each Noise Monitoring Report, and taken into account during the assessment of compliance. Noting that no non-compliances were observed, and no noise-related complaints received, this condition is considered complied with. c) Quarterly noise monitoring was conducted throughout the Audit Period. Quarterly Noise Monitoring Reports showed compliance with the criteria during all monitoring sessions. d) Quarterly Noise Monitoring Reports showed compliance with the criteria during all monitoring sessions and therefore no modifications or stopping of operations on site were required.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	5	NOISE - Noise Management Plan	Within three months of the approval of Modification 2, the Proponent must prepare a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with the EPA; (c) describe the measures to be implemented to ensure: (i) compliance with the noise criteria and operating conditions in this approval; (ii) best practice management is being employed; (iii) noise impacts of the project are minimised during noise-enhancing meteorological conditions; (d) describe the noise management system; and (e) include a monitoring program to be implemented to measure noise from the project against the noise criteria in Table 1, and which evaluates and reports on the effectiveness of the noise management system on site. The Proponent must implement the Noise Management Plan as approved by the Secretary.	10.01, 13.01	Operations are conducted in accordance with the July 2020 Noise Management Plan (the NMP). The NMP was previously assessed (in the 2021 IEA) to satisfy the requirements of this Condition, however was not submitted within three months of the approval of Modification 2 (approved in November 2018) and this Condition was therefore considered Non-compliant. Noting that the timeframe for submission falls outside (prior to) this Audit Period, this is considered not triggered for this Audit Period. Implementation of the NMP has been broadly achieved and compliant.	Compliant	NA	NA
PA_06_0030	3	6	AIR QUALITY - Impact Assessment Criteria	The Proponent must ensure that particulate matter emissions generated by the project do not cause exceedances of the criteria in Table 3 at any residence on privately-owned land. Notes: a Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources). b Incremental impact (i.e. incremental increase in concentrations due to the project on its own). c Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Secretary. d Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.	1.03, 7.06, 7.07, 7.08, 7.09, 7.1, 10.11, 10.02, 8.01, 8.05	Holcim carries out deposited dust sampling at four locations surrounding the site on a monthly basis. Throughout the audit perioid, some individual samples were above 4g/m2/month, however compliance is to be assessed on an "annual average" basis, for which all annual results were compliant, except for the annual result for DDG4 (Black Rock) in the 2021 calendar year. 2021 straddles the audit period but the 2021 Annual Review was published in 2022 which falls within the audit period and is therefore in scope. The DDG4 2021 result was averaged at 6.6 g/m2/month. The commentary regarding this result noted that it was likely affected by the activities of neighbouring properties. The audit team's assessment of potential contributing factors and prevailing winds etc suggest this could be the case. In assessing this condition, a measured exceedance does not necessarily mean non-compliance. The exceedance must also be generated by the project and cause a corresponding exceedance at privately owned land. The first of these two elements is hard to determine due to the imprecise nature of deposited dust monitoring. The second element is considered highly unlikely due to the distance of residences from the DDG4 location. DDG4 is approximately 500 m north-east of the potential dust generating area of the Site and the nearest residence is a further 850 m north-east of DDG4. Considering other lines of evidence, such as the lack of complaints, extent of buffer land, moisture content of material handled and the large particle size and resistance to airborne erosion, the audit team considers it extremely unlikely that the Project was the cause of the annual exceedance in 2021 and hence consider this condition to have been complied with. The 2025 Annual Review recorded a non-compliance against this condition due to missed samples. This is not correct - Condition 3(6) relates to the performance criteria themselves. There was no exceedance in 2025 but rather missed samples, which is a non-compliance with the frequency of monitoring specified in the Air Quality Management PLan and hence instead is a non compliance with Condition 3(7A).	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	7	AIR QUALITY - Air Quality Operating Conditions	The Proponent must: (a) implement best management practice to minimise the dust emissions of the project, including routinely watering haul roads being used by heavy vehicles and equipment; (b) regularly assess meteorological and air quality monitoring data to guide the day-to-day planning of operations and implementation of air quality mitigation measures to ensure compliance with the relevant conditions of this approval; (c) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see Note c to Table 3 above); (d) monitor and report on compliance with the relevant air quality conditions in this approval; and (e) minimise surface disturbance of the site, other than as permitted under this approval, to the satisfaction of the Secretary.	1.03, 7.06, 7.07, 7.08, 7.09, 7.1, 10.11, 10.02, 8.01, 8.05, 1.01, 1.02	Holcim has implemented a range of dust management measures to minimise particulate emissions from the site. The site access road is sealed, all outgoing loads are covered, and a shaker grid is installed to reduce the tracking of material onto public roads. Quarry plant movement areas are wet down regularly, while sand is kept wet throughout the processing operation, reducing the potential for dust generation. Staff induction and training include requirements for dust monitoring and management, and personnel have access to weather forecasting information and are trained to interpret local weather conditions to proactively manage dust risks. Internal and perimeter vegetated soil bunds, together with vegetation buffer strips, are used to reduce wind speeds and limit the movement of wind-blown dust from stockpiles. At the time of the audit, disturbance was limited to areas required for dredging, processing and material storage, further reducing the potential for dust emissions.	Compliant	NA	NA
PA_06_0030	3	7A	AIR QUALITY - Air Quality Management Plan	Within three months of the approval of Modification 2, the Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with the EPA; (c) describe the measures to be implemented to ensure: (i) compliance with the air quality criteria and operating conditions in this approval; (ii) best practice management is being employed; and (iii) air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events; (d) describe the air quality management system; and (e) include an air quality monitoring program that: (i) is capable of evaluating the performance of the project against the air quality criteria; (ii) adequately supports the air quality management system; and (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	10.02, 13.01, 1.03, 7.06, 7.07, 7.08, 7.09, 7.1, 10.11, 10.02, 8.01, 8.05, 1.01, 1.02	Operations are conducted in accordance with the February 2020 Air Quality Management Plan (the AQMP). The AQMP was previously assessed (in the 2021 IEA) to satisfy the requirements of this Condition, however was not submitted within three months of the approval of Modification 2 (approved in November 2018) and this Condition was therefore considered Non-compliant. Noting that the timeframe for submission falls outside (prior to) this Audit Period, this is considered not triggered for this Audit Period. Implementation of the AQMP has been broadly achieved, however there were a number of instances where samples were contaminated, unable to be collected due to damage to gauges etc. Instances where the averaging period was extended due to inability to collect gauges due to extreme weather etc. are not regarded as non compliances, as a monitoring result could still be obtained. A strict view of compliance with implementing the AQMP would require a valid result to be collected each month. It is arguable that damage to gauges and cross-contamination are not 'non-compliances' with implementation as Holcim made all reasonable efforts to implement the AQMP. However, considering Holcim has self-reported and identified these missed measurements as non-compliances in Annual Reviews and the Department has accepted/reiterated them as non compliances in their reply correspondence, the audit team records the 13 missed measurements (13 out of 240; 5.5% of required measurements) in the audit period as a non-compliance. Holcim achieved almost 95% compliance with measurement frequency.	Non-compliant	NA	Continue to implement the AQMP, including making best efforts to ensure dust gauges maintained and protected from contamination, noting some damage and contamination events are unavoidable. Consider in future whether such events are in fact a non-compliance for the purpose of Annual Reviews.

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	8	SOIL AND WATER - Discharges	Except as may be expressly provided for by an EPL, the Proponent must not discharge any water from the project or ancillary operational areas. The Proponent must ensure that the extraction pit subject to dredging is maintained and operated to prevent discharges of any surface water from these ponds.	8.01, 8.02, 8.03, 8.04, 8.05	Section 7.3 of the 2021-2025 Annual Reviews report that no surface water discharges occurred during the reporting periods. Observation of the ponds and discussion with staff at the site inspection indicates that the only time that ponds overtop is during extreme events such as cyclones and floods. The 2022 flood was the last recorded on the site. Cyclone Alfred (late february-early march 2025) was the last cyclone event. This condition requires discharges to be in accordance with the EPL. The EPL permits active discharge so long as certain water quality criteria are met. No active discharge has occurred in the audit period. The EPL also allows for the water quality and volume limits to be exceeded if discharge occurs due to rainfall that exceeds 82.5 mm over a five day period. This trigger occurred in the above mentioned flood/cyclone conditions and therefore the PA condition is complied with as the uncontrolled discharges occurred in a manner permitted by the EPL. During these overflow events the PIRMP was not triggered due to special dispensations. In 2022 the NSW EPA provided dispensations for not conducting testing (anecdotal evidence only, not verified) however this is consistent with the audit team's experience in similar situations on other sites and general advice issued by the NSW EPA. The audit team does not consider PIRMP activation necessary in such circumstances.	Compliant	NA	NA
PA_06_0030	3	9	SOIL AND WATER - Water Quality Objectives	The Proponent must aim to meet the water quality objectives in Table 4 for water in the dredge ponds and in groundwater adjacent the dredge ponds, unless otherwise approved by the Secretary. *Notes:* *- The objectives for dissolved oxygen, turbidity and algae are relevant to surface water only.* *- The Department acknowledges that short term exceedances of these objectives may occur during natural events such as flooding.* *- The Department acknowledges that pre-existing water quality may not meet the objectives for some analytes, including salinity. The proponent must strive to meet the water quality objectives through implementation of the Soil and Water Management Plan (see condition 18 below), as far as is reasonable and feasible and within the Proponent's control, to the satisfaction of the Secretary.*	7.06, 7.07, 7.08, 7.09, 7.1, 7.11	Holcim has generally complied with this condition by implementing the monitoring and management measures required under the Soil and Water Management Plan and regularly assessing water quality in the dredge ponds and adjacent groundwater against the approved objectives. Importantly, the development consent requires Holcim to"strive to meet" the water quality objectives through implementation of the Soil and Water Management Plan, to the extent that is reasonable and feasible, rather than achieve 100 per cent compliance with every objective at all times. PA_06_0030 acknowledges that short-term exceedances may occur due to natural events and that pre-existing water quality may not meet all objectives for some analytes. Monitoring results demonstrate that many parameters, including electrical conductivity, dissolved oxygen, pathogens, algae and most metals, were generally within objective values or exhibited only occasional exceedances. For example, no EC exceedances were recorded in the dredge or silt ponds during 2024 and 2025, while pathogen and algae results remained consistently low. However, turbidity objectives were exceeded on multiple occasions, with elevated levels associated with active dredging operations and storm events. Annual reviews also note that some groundwater parameters, including iron, aluminium and salinity in certain bores, have historically exceeded objectives, reflecting site-specific background conditions. Despite these exceedances, Holcim continued to undertake monitoring, report results, investigate trends and implement management measures in accordance with the approved plans. On this basis, the available evidence supports a finding of general compliance with the requirement to strive to meet the water quality objectives.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	10	SOIL AND WATER - Fines Management	The Proponent must ensure that all excavated potential acid sulfate soil fines material is returned back to below the water table as soon as possible to prevent oxidation. No potential acid sulfate soil must be removed from the site, unless adequately neutralised in accordance with methods approved under the Soil and Water Management Plan.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 1.03, 8.05	Improvements to fines management indicate that potential acid sulfate soil (PASS) fines are being transferred more rapidly and effectively back into the pond system, reducing the opportunity for oxidation. Previous audits noted significant improvements resulting from fines being piped directly to Pond 1, rather than being exposed for extended periods during handling. This has improved both the speed of fines deposition and the depth at which fines are returned to the waterbody. Water quality monitoring also demonstrates generally favourable pH conditions within the dredge and silt ponds, with annual average pH results of approximately 6.5 to 7.8 in recent years, indicating neutral to slightly alkaline conditions rather than the acidic conditions typically associated with oxidised acid sulfate soils. Improvements to wash plant efficiency have further reduced the accumulation and handling of fines by facilitating more direct return of fine materials to the pond system. Topsoil (overburden) materials are limed during excavation and windrowing prior to storage. There was no evidence of oxidised material or PASS/AASS on Site. There was no evidence of fish kills or other acute impacts of AASS. These lines of evidence indicate that Holcim is managing PASS fines in a manner consistent with the requirement to return excavated potential acid sulfate soil fines material below the water table as soon as possible to prevent oxidation.	Compliant	NA	NA
PA_06_0030	3	11	SOIL AND WATER - Fines Management	The Proponent must ensure that all potential acid sulfate soil fines material is discharged into the pond at a depth of no less than 3 metres from the water surface, and that all fines are deposited to a final depth of at least 8 metres from the water surface, unless an alternative method(s) is approved by DoI and the Secretary.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 1.03, 8.05, 2.01, 2.02	Observations on Site and discussions with Site management confirm that the discharge point into the silt pond is set at 3m and this has been achieved through an engineered pipeline with a set depth. The dredge is sometimes brought to the silt pond for reclaim, with undersize fines discharged back to 8m depth. The bathymetric survey indicated that available depth in silt pond (1) was now approaching 7.5m. We understand there is transfer of fines to the dredge pond for final placement and there is ample depth in the dredge pond >8 m to ensure the balance of fines are placed at a final depth of >8 m.	Compliant	NA	NA
PA_06_0030	3	12	SOIL AND WATER - Wastewater Treatment	The Proponent must manage on-site sewage to the satisfaction of Council and EPA. The facility must comply with the requirements of the *Environment and Health Protection Guidelines – On-site Sewage Management for Single Households (1998)* .	13.01, 6.01	Tweed Shire Council issued an approval for the On-Site Sewage system in July 2017, however the approval lapsed around 2023. Since then, we are advised the SIte has been working with Council to resinstate the approval. Plumber is now preparing documents for Council to get a renewed permit/approval for the OSSS. The system tanks were observewd to be above ground with no evidence of leakage. The disposal area showed no signs of effluent on the surface and vegetation was maintained. There is insufficient evidence that Holcim is managing on-site sewage to the 'satisfaction' of Council and the NSW EPA. A permit/approval for the OSSS is the appropriate mechanism to demonstrate this and should be reinstated as soon as possible.	Non-compliant	NA	The audit team notes that the AWTS approval has been granted dated 15/9/2026. This audit recommendation has been closed out prior to the audit report being finalised.
PA_06_0030	3	13	SOIL AND WATER - Flood Management	The Proponent must ensure that flood bunding around the Stage 1 and Stage 2 works does not exceed 300 mm in height above natural surface level, to a maximum height of 2.0 m AHD, unless otherwise approved by the Secretary.	1.03, 2.01	Bunding was observed to be generally between 0.3 m and 0.6 m. Flood dividers and gaps are used to allow for flood egress.	Compliant	NA	NA
PA_06_0030	3	14	SOIL AND WATER - Flood Management	The Proponent must ensure that perimeter drainage must be installed and operational prior to the construction of bunding or the placement of fill on site.	13.01, 13.02, 1.03	The timeframe for this Condition has been passed, noting that operations on the Site commenced in 2010. Assessed in 2016 EIA as compliant.	Not triggered	NA	NA
PA_06_0030	3	15	SOIL AND WATER - Flood Management	All earthworks, including flood and acoustic bunding works, must be contained wholly within the site.	1.03, 1.02, 2.01	All works were fully within the site, based on observations, boundary marking and aerial imagery.	Compliant	NA	NA
PA_06_0030	3	16	SOIL AND WATER - Flood Management	The Proponent must cease dredging and processing activities not less than 24 hours prior to the commencement of overflow from any dredge pond. No dredging or processing must occur when the dredge ponds are overflowing.	1.03	All dredging works were stopped >24 hours prior to any extreme weather event that caused an uncontrolled overflow of the dam(s) due to early warning systems and the need for a controlled shutdown of the Site. No active discharges occurred during the audit period.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	17	SOIL AND WATER - Flood Management	The Proponent must ensure that the flood storage capacity of the site is no less than the pre-existing flood storage capacity at all stages of the project. Details of the available flood storage capacity must be reported in the Annual Review.	8.01, 8.02, 8.03, 8.04, 8.05	Section 7.6 of the 2021-2025 Annual Reviews report that the site was constructed in accordance with the approved plans, and that as there were no significant changes to the infrastructure or landform of the site during each reporting period, that there were no changes to the flood storage capacity. Accordingly, the flood capacity at the site would be no less than the capacity at the commencement of the project. Flood storage is being reported on in the Annual Review, which satisfies the administrative requirement of this condition. The audit team is in agreement with Holcim's assessment that, based on an observational/qualitative assessment of topography and volume available on Site, it is likely the available flood storage is unchanged from the pre-development conditions at the Site.	Compliant	NA	NA
PA_06_0030	3	18	SOIL AND WATER - Management and Monitoring	The Proponent must prepare a Soil and Water Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with DoI and EPA; (b) include a: - Water Balance; - Erosion and Sediment Control Plan; - Acid Sulfate Soil Management Plan; - Blue-Green Algae Management Plan; - Surface Water Monitoring Program; and - Groundwater Monitoring Program; and (c) be submitted to the Secretary prior to starting quarrying operations, and prior to carrying out any development on the site in the case of the Erosion and Sediment Control Plan. The Proponent must implement the plan as approved by the Secretary.	10.03, 10.03, 8.01, 8.02, 8.03, 8.04, 8.05	The SWMP has been updated and revised multiple times throughout the audit period. The latest version is dated March 2026 and has been accepted by DPHI. The available evidence indicates Holcim has implemented the various versions of the SWMP appropriately during the audit period. Holcim has continued to improve the management of fines and potential acid sulfate soil (PASS) materials during the audit period. Previous audits identified significant improvements through the direct piping of fines to Pond 1, allowing fine materials to be deposited more rapidly and at greater depth below the water table, thereby reducing the risk of oxidation. Improvements to wash plant efficiency have further reduced fines handling and facilitated the prompt return of fine material to the pond system. Water quality monitoring indicates that pond pH has generally remained neutral to slightly alkaline, with annual average pH values typically between 6.5 and 7.8, demonstrating there is no evidence of a trend of acidic conditions associated with oxidised PASS. In addition, the historical practice of using sodium carbonate ($NaCO_3$) to buffer white sands in the wash plant has been replaced, where required, with agricultural lime, reducing sodium inputs while maintaining pH neutralising capacity.	Compliant	NA	NA
PA_06_0030	3	19	SOIL AND WATER - Management and Monitoring	The Water Balance must include: (a) details of all water extracted, transferred, used and/or discharged by the quarry; (b) the source of all water collected or stored on the site, including rainfall, stormwater and groundwater; and (c) measures to minimise water use by the project.	10.03, 13.01	These details are provided in Section 4 of the SWMP. This Condition was considered compliant in the 2021 IEA.	Compliant	NA	NA
PA_06_0030	3	20	SOIL AND WATER - Management and Monitoring	The Erosion and Sediment Control Plan must: (a) be consistent with the requirements of Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom), and Council's codes including its Code of Practice for Soil and Water Management on Construction Sites, Development Design Specification D7 – Stormwater Quality and Tweed Urban Stormwater Quality Management Plan; (b) identify activities that could cause soil erosion and generate sediment; (c) describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters; (d) describe the location, function, and capacity of erosion and sediment control structures; and (e) describe what measures would be implemented to maintain these structures over time.	10.03, 13.01	These requirements are satisfied by the SWMP. This Condition was also considered compliant in the 2021 IEA.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	21	SOIL AND WATER - Management and Monitoring	The Acid Sulfate Soil Management Plan must: (a) be consistent with the NSW Acid Sulphate Soil Advisory Committee's Acid Sulfate Soil Manual; and (b) define procedures for managing the potential acid sulfate soils on the site, including sample testing and procedures.	10.03, 13.01	These requirements are satisfied by the SWMP. This Condition was also considered compliant in the 2021 IEA.	Compliant	NA	NA
PA_06_0030	3	22	SOIL AND WATER - Management and Monitoring	The Blue-Green Algae Management Plan must: (a) be prepared by a suitably qualified blue-green algae expert, whose appointment has been approved by the Secretary; (b) be consistent with extant guidelines for blue-green algae management including the NHMRC's Guidelines for Managing Risks in Recreational Water; (c) describe the measures that would be implemented to prevent and control the sources of algal blooms over the short, medium and long term; and (d) define procedures for the management and notification of identified algal blooms.	10.03, 13.01	These requirements are satisfied by the SWMP. This Condition was also considered compliant in the 2021 IEA.	Compliant	NA	NA
PA_06_0030	3	23	SOIL AND WATER - Management and Monitoring	The Surface Water Monitoring Program must include: (a) detailed baseline data on surface water quality; (b) surface water impact assessment criteria; (c) a program to monitor surface water flows and quality; (d) a program to manage water releases from the site; (e) a program to monitor bank and bed stability; and (f) a protocol for the investigation, notification and mitigation of identified exceedances of the surface water impact assessment criteria.	10.03, 13.01	These requirements are satisfied by the SWMP. This Condition was also considered compliant in the 2021 IEA.	Compliant	NA	NA
PA_06_0030	3	24	SOIL AND WATER - Management and Monitoring	The Ground Water Monitoring Program must include: (a) detailed baseline data on groundwater levels and quality, based on statistical analysis; (b) groundwater impact assessment criteria; (c) a program to monitor ground water levels and quality; (d) a program to monitor ground water level effects on vegetation, and on ground water supply to adjoining properties; and (e) a protocol for the investigation, notification and mitigation of identified exceedances of the groundwater impact assessment criteria.	10.03, 13.01	These requirements are satisfied by the SWMP. This Condition was also considered compliant in the 2021 IEA.	Compliant	NA	NA
PA_06_0030	3	25	REHABILITATION AND LANDSCAPING - Rehabilitation and Revegetation	The Proponent must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the proposed rehabilitation activities described in the documents listed in condition 2 of Schedule 2 and comply with the objectives in Table 5.	8.01, 8.02, 8.03, 8.04, 8.05	Section 8.1 of the 2021-2025 Annual Reviews report that no rehabilitation activities were conducted during each reporting period except for monitoring. Holcim leases the Site from the named Proponent (Ramtech Pty Ltd) and the lease delegates the vast majority of requirements under the project approval to Holcim. Responsibility to rehabilitate the land remains with Ramtech Pty Ltd and Holcim has limited ability conduct rehab work (none was required during the audit period). Holcim is responsible for rehabiliation monitoring etc. and this is clearly delegated through the terms of the lease agreement. Progressive rehabilitation can be carried out, but final rehabilitation is not yet triggered.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	26	REHABILITATION AND LANDSCAPING - Rehabilitation and Revegetation	The Proponent must: (a) rehabilitate and revegetate the 15 ha hectares of land identified in the EA (see the revegetation plan in Appendix 2); and (b) within 12 months of the commencement of quarrying operations, make suitable arrangements to provide appropriate long term security for the revegetation area to ensure it is managed for conservation purposes, to the satisfaction of the Secretary.	2.01	a) Aerial imagery from 2025 shows the areas identified in Appendix 2 of the PA as succesfully rehabilitated/revegetated. b) This timeframe is outside of (prior to) the Audit Period for this audit.	Not triggered	NA	NA
PA_06_0030	3	27	REHABILITATION AND LANDSCAPING - Landscape Management Plan	The Proponent must prepare a Landscape Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared: - by suitably qualified consultants, including a specialist hydrologist, coastal engineer, wetlands ecologist and landscape architect; - in consultation with Council, DoI, OEH, DPI Fisheries and the CCC; and - in accordance with extant guidelines including the DoI's Constructed Wetlands Manual, Volumes 1 and 2 and the DPI's Policy and Guidelines: Aquatic Habitat Management, 1999; (b) be submitted to the Secretary prior to starting quarrying operations on the site; and (c) include a: - Rehabilitation and Revegetation Management Plan; and - Long Term Management Strategy. The Proponent must implement the plan as approved by the Secretary. *Note: The Department accepts that the initial Landscape Management Plan may not include the detailed Long Term Management Strategy. However, a conceptual strategy must be included in the initial plan, along with a timetable for augmentation of the strategy with each subsequent review of the plan.*	10.04	Operations are conducted in accordance with the April 2022 Landscape Management Plan (the LMP). The 2022 plan meets these requirements. Evidence of implementation identified during the audit consists of: Completion of the required rehabilitation monitoring inspections. Weed and pest management activities. Maintenance of rehabilitation areas and vegetation buffers. Ecological monitoring records and monitoring forms. Ongoing management of the three rehabilitation zones and native vegetation areas.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	28	REHABILITATION AND LANDSCAPING - Landscape Management Plan	The Rehabilitation and Revegetation Management Plan must include: (a) the rehabilitation objectives for the site and revegetation areas; (b) a description of the short, medium, and long term measures that would be implemented to: - rehabilitate and stabilise the site; - implement the revegetation strategy; and - manage the remnant vegetation and habitat on the site and in the revegetation areas; (c) detailed performance and completion criteria for the rehabilitation and stabilisation of the site and implementation of the revegetation strategy; (d) a detailed description of how the performance of the rehabilitation of the quarry and the revegetation areas would be monitored over time to achieve the stated objectives; (e) a detailed description of what measures would be implemented over the next 5 years to rehabilitate and manage the landscape of the site and revegetation areas including the procedures to be implemented for: - progressively rehabilitating and stabilising areas disturbed by quarrying; - implementing revegetation and regeneration within the disturbance areas and revegetation areas; - protecting areas outside the disturbance areas, including SEPP 14 wetlands and SEPP 26 littoral rainforests;	10.04, 1.03	The 2022 LMP meets these requirements and has been accepted by the Department.	Compliant	NA	NA
PA_06_0030	3	29	REHABILITATION AND LANDSCAPING - Landscape Management Plan	The Long Term Management Strategy must: (a) define the objectives and criteria for quarry closure and post-extraction management; (b) investigate options for the future use of the site; (c) describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the project; and (d) describe how the performance of these measures would be monitored over time.	10.04, 13.01	These requirements are satisfied by the LMP.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	30	REHABILITATION AND LANDSCAPING - Rehabilitation Bond	Prior to starting quarrying operations on the site, the Proponent must lodge a rehabilitation bond for the project with the Secretary. The sum of the bond must be calculated at: (a) $2.50/m2 for the total area to be disturbed and/or revegetated in each 5 year review period (see condition 31 below); and (b) $1.50/m2 for the total area of land previously disturbed and/or rehabilitated by the project, to the satisfaction of the Secretary. *Notes:* *- If the rehabilitation and revegetation works are completed to the satisfaction of the Secretary, the Secretary will release the rehabilitation bond.* *- If the rehabilitation and revegetation works are not completed to the satisfaction of the Secretary, the Secretary will call in all or part of the rehabilitation bond, and arrange for the satisfactory completion of the relevant works*	13.02	This Condition was considered compliant in the 2016 IEA. The timeframe for this Condition falls outside (prior to) this Audit Period.	Not triggered	NA	NA
PA_06_0030	3	31	REHABILITATION AND LANDSCAPING - Rehabilitation Bond	Within 6 months of each Independent Environmental Audit (see condition 6 of schedule 5) excluding the inaugural audit, unless the Secretary directs otherwise, the Proponent must review, and if necessary revise, the sum of the rehabilitation bond to the satisfaction of the Secretary. This review must consider: (c) the effects of inflation; (d) any changes to the total area of disturbance; and (e) the performance of the rehabilitation and revegetation to date.	13.01, 14.01, 14.02, 4.02	The 2021 IEA was undertaken by NGH Pty Ltd on 20 July 2021. The report was not finalised until February 2022. Evidence has been sighted of a review submitted to DPHI dated May 2021 and a reply from DPHI dated September 2021. If we take the audit 'date' to be July 2021 then the review has been submitted and approved within 6 months of that audit. The fact the audit report was only completed at a later date is not considered to create a technical non-compliance. Holcim revised the rehabilitation bond at or around the same time as the 2021 audit, which aligns with the intent of the condtion - for timely review of the bond following audits.	Compliant	NA	NA
PA_06_0030	3	32	ABORIGINAL CULTURAL HERITAGE - Aboriginal Cultural Heritage Management Plan	The Proponent must prepare an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with OEH and all relevant Aboriginal communities; (b) be submitted to the Secretary for approval prior to commencement of construction; and (c) include a: - program for additional archaeological survey/s of the disturbance area; - description of the measures that would be implemented to salvage any identified Aboriginal sites within the disturbance area; - description of the measures that would be implemented to protect any Aboriginal sites outside the disturbance area; and - description of the measures that would be implemented if any new Aboriginal objects or skeletal remains are discovered during the project. The Proponent must implement the plan as approved by the Secretary	10.05, 13.01, 1.03	Operations are conducted in accordance with the Aboriginal Cultural Heritage Management Plan dated December 2019 (the ACHMP). The ACHMP was previously assessed (in the 2021 IEA) to satisfy the requirements of this Condition. The only ongoing provisions of the plan relate to the management of unexpected finds. There have been no unexpected finds in the audit period.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	33	TRAFFIC AND TRANSPORTATION - Road Haulage	Prior to commencement of operations the Proponent must: (a) design and construct the haul road and its intersection with Pottsville-Mooball Road; and (b) install advanced truck turning warning signage along Pottsville-Mooball Road, to the satisfaction of Council.	13.01	The timeframe for this Condition has been passed, noting that operations on the Site commenced in 2010. This Condition was considered compliant in the 2022 IEA.	Not triggered	NA	NA
PA_06_0030	3	34	TRAFFIC AND TRANSPORTATION - Road Haulage	The Proponent must ensure that all loaded vehicles entering or leaving the site have their loads covered.	1.03	All vehicles observed at the Site had their loads covered when leaving and entering. This is also addressed in the driver induction.	Compliant	NA	NA
PA_06_0030	3	35	TRAFFIC AND TRANSPORTATION - Road Haulage	The Proponent must ensure all loaded vehicles leaving the site are cleaned of materials that may fall on the road before they are allowed to leave the site.	1.03	All vehicles observed at the Site had their loads covered when leaving and entering. This is also addressed in the driver induction. No loose materials were observed on the entry or long asphalt haul road to the Site.	Compliant	NA	NA
PA_06_0030	3	35A	TRAFFIC AND TRANSPORTATION - Road Maintenance	Within 12 months of approval of Modification 2, unless otherwise agreed by the Secretary, the Proponent must implement and pay the full cost of implementing the recommended treatments listed in Table 3 of the Independent Road Safety Audit prepared by Bitzios Consulting and dated 16 October 2017, and outlined in the Proponent's Response to Road Safety Audit dated March 2018, to the satisfaction of Council, including any additional line marking and signage requested by Council. *Note: The Proponent must obtain all necessary approvals under section 138 of the Roads Act 1993 from Council before implementing the recommended treatments.*	13.01	The timeframe for this Condition has been passed, noting that Modification 2 was approved in November 2018. This Condition was considered compliant in the 2022 IEA.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	35B	TRAFFIC AND TRANSPORTATION - Traffic Management Plan	The Proponent must prepare a Traffic Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with RMS and Council; (b) be submitted to the Secretary for approval prior to the commencement of operations under Modification 2, unless otherwise agreed by the Secretary; (c) describe the processes in place for the management of trucks entering and exiting the site; (d) include a Drivers' Code of Conduct that details: - safe and quiet driving practices that must be used by drivers travelling to and from the quarry; - a map of the primary haulage routes highlighting critical locations for application of safe and quiet driving practices, including residential areas and school bus routes; - an induction process for drivers and regular toolbox meetings; - complaint resolution procedures; - any community consultation measures in respect of peak haulage periods; and - consideration of seasonal traffic and events; (e) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct; and	13.01	The TMP meets these requirements and appropriate cross-references have been inserted as per recommendations from 2021 IEA. Otherwise compliant as per assessment in 2021 IEA.	Compliant	NA	NA
PA_06_0030	3	36	TRAFFIC AND TRANSPORTATION - Parking	The Proponent must provide sufficient parking on-site for all project-related traffic and visitors, in accordance with Council's parking codes and to the satisfaction of the Secretary. No on street parking must be undertaken.	1.03, 2.01	Parking on site for Light vehicles and visitors up to 10 vehicles.Heavy vehicle parking ample on site.	Compliant	NA	NA
PA_06_0030	3	37	VISUAL IMPACT - Visual Amenity	The Proponent must minimise the visual impacts of the project to the satisfaction of the Secretary.	5, 1.03, 2.01, 9	Buffer plantings for stage 1 established and maintained. Rehab plantings to the north and east implemented and maintained. Visual impact and amenity has not been raised in complaints or in CCC minutes throughout the audit period. No evidence that visual impact is a concern for the Project.	Compliant	NA	NA
PA_06_0030	3	38	VISUAL IMPACT - Visual Amenity	The Proponent must establish and subsequently maintain the vegetated buffer around the extraction area within 12 months of the date of this approval. *Note: The vegetation buffer must be detailed in the Landscape Management Plan.*	5, 1.03, 2.01, 9	Buffer plantings are in place and maintained appropriately based on site observations and aerial images.	Compliant	NA	NA
PA_06_0030	3	39	VISUAL IMPACT -Lighting Emissions	The Proponent must: (a) take all practicable measures to mitigate off-site lighting impacts from the project; and (b) ensure that all external lighting associated with the project complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Secretary.	1.03, 5, 1.03, 2.01, 9	Minimal exterior lighting, no evidence to suggest lighting is a concern or is not meeting this conditon.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	3	40	VISUAL IMPACT -Advertising	The Proponent must not erect or display any advertising structure(s) or signs on the site without the written approval of the Secretary. *Note: This does not include business identification, traffic management and safety or environmental signs.*	1.03	There are no advertising signs in place at the Site.	Compliant	NA	NA
PA_06_0030	3	41	WASTE MANAGEMENT	The Proponent must minimise the amount of waste generated by the project to the satisfaction of the Secretary.	1.03	Operations are conducted in accordance with the 2020 Waste Management Plan (the WMP). Section 4 of the WMP details how the amount of waste generated by the project will be minimised. There is minimal waste generated on site due to the low staffing level. Where possible, wastes are recycled, for example, waste oils.	Compliant	NA	NA
PA_06_0030	3	42	EMERGENCY AND HAZARDS MANAGEMENT - Dangerous Goods	The Proponent must ensure that the storage, handling, and transport of dangerous goods are conducted in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.	1.03, 1.01, 1.02	The storage and management of liquids, lubricants and dangerous goods such as corrosive chemicals, fuels, etc. was of a very high standard at the Site. Bunds and isolation were used effectively and there was no evidence of any spills or leaks, including at the diesel bowser which is to be commended. Spill kits available where required, sign-posted and observed to be well stocked.	Compliant	NA	NA
PA_06_0030	3	43	EMERGENCY AND HAZARDS MANAGEMENT -Safety	The Proponent must secure the project to ensure public safety to the satisfaction of the Secretary.	1.03, 1.01, 1.02	The Site is fenced. The main entrance has a sturdy and lockable gate. There is ample signage around the Site to identify it.	Compliant	NA	NA
PA_06_0030	3	44	EMERGENCY AND HAZARDS MANAGEMENT -Bushfire Management	The Proponent must: (a) ensure that the project is suitably equipped to respond to any fires on-site; and (b) assist the rural fire service and emergency services as much as possible if there is a fire onsite.	1.03, 1.01, 1.02	Extinguishers located around the site. Fire suppression systems on equipment. In the process of using a water-based fire suppression system to the dredge.	Compliant	NA	NA
PA_06_0030	3	45	PRODUCTION DATA	The Proponent must: (a) provide annual production data to the DRG using the standard form for that purpose; and (b) include a copy of this data in the Annual Review.	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	Section 4.4 of the 2021-2025 Annual Review presents annual production data. Holcim manages submission of production data to DRE via a centralised corporate process.	Compliant	NA	NA
PA_06_0030	4	1	NOTIFICATION OF LANDOWNERS	If the results of monitoring required in schedule 3 identify that impacts generated by the project are greater than the relevant impact assessment criteria, then the Proponent must notify the Secretary, affected landowners, and/or existing or future tenants accordingly, and provide quarterly monitoring results to each of these parties until the results show that the project is complying with the relevant criteria.	8.01, 8.02, 8.03, 8.04, 8.05	Monitoring undertaken during the audit period identified some exceedances of approved environmental criteria, including deposited dust and water quality parameters. Where exceedances occurred, they were documented in annual reviews and, where required, reported to regulators. Monitoring results generally demonstrated compliance or improvement following the identified exceedances, satisfying the intent of the condition. There are no significant exceedances of impacts predicted in the EIS.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	4	2	INDEPENDENT REVIEW	If a landowner considers that the project is exceeding the impact assessment criteria in schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the project on his/her land. If the Secretary is satisfied that an independent review is warranted, the Proponent must within 3 months of the Secretary advising that an independent review is warranted: (a) consult with the landowner to determine his/her concerns; (b) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to conduct monitoring on the land, to determine whether the project is complying with the relevant criteria in schedule 3, and identify the source(s) and scale of any impact on the land, and the project's contribution to this impact; and (c) give the Secretary and landowner a copy of the independent review.	1.03	No such request has been made.	Not triggered	NA	NA
PA_06_0030	4	3	INDEPENDENT REVIEW	If the independent review determines that the project is complying with the relevant criteria in schedule 3, then the Proponent may discontinue the independent review with the approval of the Secretary.	1.03	As above.	Not triggered	NA	NA
PA_06_0030	4	4	INDEPENDENT REVIEW	If the independent review determines that the project is not complying with the relevant criteria in schedule 3, and that the project is primarily responsible for this non-compliance, then the Proponent must: (a) implement all reasonable and feasible measures, in consultation with the landowner, to ensure that the project complies with the relevant criteria; and (b) conduct further monitoring to determine whether these measures ensure compliance; or (c) secure a written agreement with the landowner to allow exceedances of the relevant criteria in schedule 3, to the satisfaction of the Secretary. If the additional monitoring referred to above subsequently determines that the project is complying with the relevant criteria in schedule 3, or the Proponent and landowner enter into a negotiated agreement to allow these exceedances, then the Proponent may discontinue the independent review with the approval of the Secretary.	1.03	As above.	Not triggered	NA	NA
PA_06_0030	4	5	INDEPENDENT REVIEW	If the landowner disputes the results of the independent review, either the Proponent or the landowner may refer the matter to the Secretary for resolution.	1.03	As above.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	5	1	ENVIRONMENTAL MANAGEMENT - Environmental Management Strategy	The Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary prior to starting quarrying operations on the site; (b) be prepared in consultation with the relevant agencies; (c) provide the strategic context for environmental management of the project; (d) identify the statutory requirements that apply to the project; (e) describe in general how the environmental performance of the project would be monitored and managed; (f) describe the procedures that would be implemented to: - keep the local community and relevant agencies informed about the construction, operation and environmental performance of the project; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise during the life of the project; - respond to any non-compliance; - manage cumulative impacts; and - respond to emergencies; (g) describe the role, responsibility, authority, and accountability of the key personnel involved in the environmental management of the project; and	10.08, 1.03	The previous IEA assessed the 2020 EMS and found it to be largely compliant. The July 2021 EMS satisfies the requirements of clauses (c) through (h) and provides the overarching framework for implementation of the site's environmental management system. It identifies the applicable statutory approvals, references all key management plans, allocates responsibilities, and incorporates a consolidated monitoring program covering air quality, noise, water quality, rehabilitation and biodiversity. The annual reviews further demonstrate that the EMS continues to be implemented through ongoing monitoring, reporting and periodic review of the management plans. Accordingly, based on the available evidence, I would assess the condition as Compliant, subject to confirmation that the original EMS was submitted before quarrying commenced and was prepared in consultation with the relevant agencies.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	5	1A	ENVIRONMENTAL MANAGEMENT -Management Plan Requirements	The Proponent must ensure that the management plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) a summary relevant background or baseline data; (b) a description of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions); - any relevant limits or performance measures/criteria; and - the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the project or any management measures; (c) a description of the measures that to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: - impacts and environmental performance of the project; and - effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (f) a program to investigate and implement ways	10.01, 10.02, 10.03, 10.04, 10.05, 10.06, 10.07, 10.08, 13.01	Seven sub-plans have been prepared, with the current versions as below: Noise Management Plan - July 2020 Air Quality Management Plan - February 2020 Soil and Water Management Plan - March 2026 Landscape Management Plan - April 2022 Aboriginal Cultural Heritage Management Plan - 2019 Traffic Management Plan - May 2019 Waste Management Plan - July 2020 All sub-plans have been assessed either in the previous (2021) EIA or this EIA as meeting the requirements of this Condition, whether directly, or by deferring to the EMS.	Compliant	NA	NA
PA_06_0030	5	1B	ENVIRONMENTAL MANAGEMENT -Revision of Strategies, Plans & Programs	Within 3 months of the submission of: (a) an incident report under condition 4 below; (b) an Annual Review under condition 5 below; (c) an audit report under condition 6 below; and (d) any modifications to this approval, the Proponent must review the strategies, plans and programs required under this approval, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary. *Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the project.*	8.01, 8.02, 8.03, 8.04, 8.05, 4.04, 4.06, 4.07	Five Annual Reviews were submitted during the Audit Period, for 2021-2025. The 2021 Audit Report was completed in February 2022 and submitted shortly after. No incidents occurred in the audit period and there were no further modifications to the Consent. Evidence has been provided of review of management plans and notification of the Department following the 2022, 2024 and 2025 Annual Reviews. No evidence has been sighted in relation to review of management plans specifically following submission of the 2021 IEA in early 2022 or following submission of the 2021 Annual Review.	Non-compliant	NA	Ensure that management plans are appropriately reviewed following all triggers, including audits and annual reviews.
PA_06_0030	5	2	ENVIRONMENTAL MONITORING PROGRAM	The Proponent must prepare an Environmental Monitoring Program for the project to the satisfaction of the Secretary. This program must be submitted to the Secretary prior to starting quarrying operations on the site, and consolidate the various monitoring requirements in schedule 3 of this approval into a single document.	10.09	The July 2021 Environmental Monitoring Program satsfies the requirements of this Condition.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	5	3	INCIDENT REPORTING	Within 24 hours of detecting an exceedance of the limits/performance criteria in this approval or the occurrence of an incident that causes (or may cause) material harm to the environment, the Proponent must notify the Department and other relevant agencies of the exceedance/incident.	1.03, 7, 8	Exceedances of water quality criteria are not considered to meet the definition of an incident as they are not strict performance criteria, rather they are values the Proponent is required to strive toward. Missed measurements etc. also do not constitute exceedance of criteria. No evidence of exceedance of criteria that would potentially threaten material harm.	Not triggered	NA	NA
PA_06_0030	5	4	INCIDENT REPORTING	Within 6 days of notifying the Department and other relevant agencies of an exceedance/incident, the Proponent must provide the Department and these agencies with a written report that: (a) describes the date, time, and nature of the exceedance/incident; (b) identifies the cause (or likely cause) of the exceedance/incident; (c) describes what action has been taken to date; and (d) describes the proposed measures to address the exceedance/incident.	1.03, 7, 8	As above.	Not triggered	NA	NA
PA_06_0030	5	4A	REGULAR REPORTING	The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	14.01	Holcim's website for the Project was reviewed and observed to contain up-to-date information/documentation.	Compliant	NA	NA
PA_06_0030	5	5	ANNUAL REVIEW	Within 12 months of the date of this approval, and annually thereafter, the Proponent must submit an Annual Review to the Secretary and relevant agencies. This report must: (a) identify the standards and performance measures that apply to the project; (b) describe the works carried out in the last 12 months; (c) describe the works that will be carried out in the next 12 months; (d) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; (e) include a summary of the monitoring results for the project during the past year; (f) include an analysis of these monitoring results against the relevant: - impact assessment criteria/limits; - monitoring results from previous years; and - predictions in the documents listed in	8.01, 8.02, 8.03, 8.04, 8.05	Annual Reviews prepared during the Audit Period (2021-2025) were considered to satisfy this Condition.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	5	6	INDEPENDENT ENVIRONMENTAL AUDIT	Within 2 years of the start of quarrying operations on site, and every 5 years thereafter, unless the Secretary directs otherwise, the Proponent must commission, commence and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the project, and its effects on the surrounding environment; (d) assess whether the project is complying with the relevant standards, performance measures and statutory requirements; (e) review the adequacy of any strategy/plan/program required under this approval; (f) recommend measures or actions to improve the environmental performance of the project.	13.01, 13.02	The 2021 IEA was undertaken by NGH Pty Ltd on 20 July 2021 and considered to satsisfy requirements (a)-(g) of this Condition. The previous IEA (2016 IEA) was undertaken by Mark Rigby & Associates on 30 May 2016. The 2021 IEA assessed that its timing was compliant with the 5 year timeframe from the previous 2016 audit. Although the Site inspection was conducted on 20 July, which is slightly outside of the 5-year timeframe from the date of the previous audit (30 May 2021) the audit team does not believe it is appropriate to overturn the compliance rating given in the 2021 audit and accepted by the Department. It may be that due to the wording of this condition, the 2021 IEA was *commissioned* within the appropriate timeframe and therefore can be considered compliant. This audit inspection was conducted on 13 July 2026, which is less than 5 years since the 20 July 2021 audit inspection. The audit team considers that the audit inspection date is the 'commencement' of the audit, as per established practice and norms in IEAs in NSW and consistent with the guidance in the *Independent Audit Post Approval Requirements* (March 2026). The IAPAR 2026 states that audit team approval is required prior to the 'commencement' of an audit. Also, it states that *"Independent Audits must commence with an opening meeting"* ; the opening meeting of this audit occurred on the day of the Site inspection, 13 July 2026. Therefore, the audit inspection date is the 'commencement date' for the 2026 IEA.	Compliant	NA	NA
PA_06_0030	5	7	INDEPENDENT ENVIRONMENTAL AUDIT	Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Secretary, the Proponent 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, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.	13.01	The 2021 IEA was commenced (as per the explanation above) on 20 July 2021. Therefore, in order to comply with this condition, the report would need to be submitted to the Department by 20 October 2021. The 2021 IEA report was not completed until February 2022. No extension correspondence or other evidence has been sighted that confirms more time was allowed for submission. The 2026 IEA was commenced on 13 July 2026 and is due 13 October 2026.	Non-compliant	NA	Ensure that future audit reports are complete and submitted within 3 months of commencement of the audit (commencement taken to be the date on which the site inspection is completed).
PA_06_0030	5	8	INDEPENDENT ENVIRONMENTAL AUDIT - Monitoring and Environmental Audits	Any condition of this approval 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 project to provide data on compliance with the approval or on the environmental impact of the project, and an "environmental audit" is a periodic or particular documented evaluation of the project to provide information on compliance with the approval or the environmental management or impact of the project.*	1.03	Noted.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
PA_06_0030	5	9	COMMUNITY CONSULTATIVE COMMITTEE	Prior to starting quarrying operations on the site, the Proponent must establish a CCC for the project. This CCC must be established and operated in accordance with the Department's Community Consultative Committee Guidelines: State Significant Projects (2016), and to the satisfaction of the Secretary. *Notes:* *- The CCC is an advisory committee only.* *- In accordance with the guidelines, the committee should comprise an independent chair and appropriate representation from the Proponent, Council and the local community.*	5.01, 5.02, 5.03, 5.04, 5.05, 5.06, 5.07	CCC Meetings were held during the Audit Period (or replaced with reports, due to COVID) on a roughly six-monthly basis, as follows: July 2021, December 2021, July 2022, February 2023, July 2023, February 2025, July 2025, February 2026. Minutes were uploaded to the Company website.	Compliant	NA	NA
PA_06_0030	5	10	ACCESS TO INFORMATION	Within 1 month of the approval of any plan/strategy/program required under this approval (or any subsequent revision of these plans/strategies/programs), or the completion of any independent environmental audit or Annual Review, the Proponent must: (a) provide a copy of the relevant document/s to Tweed Shire Council and relevant agencies; and (b) ensure that a copy of the relevant document/s is made publicly available on site and/or at the Proponent's regional office, to the satisfaction of the Secretary.	8.06, 8.07, 10.11	a) Evidence has been sighted of submission of the 2025 Annual Review and the 2026 Soil and Water Management Plan to Tweed Shire Council and the 2023 Annual Review to the NSW EPA. Anecdotal evidence suggests that previous annual reviews and updated plans were also submitted, however every instance has not been verified with documentary evidence. Council is engaged in the project and the website provides a sound and up to date record of documents. b) Documents are available on the Company website. RFI: Evidence of provision within 1-month timeframe.	Compliant	Review internal processes and reminders/automations to ensure that Council and other relevant agencies are provided copies of updated plans, audits and Annual reviews. Consider a checklist or similar standardised form for managing administrative requirements for these documents.	NA
PA_06_0030	5	11	ACCESS TO INFORMATION	For the life of the project, the Proponent 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; - all approved strategies, plans and programs required under the conditions of this consent; - a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; - a complaints register, updated monthly; - the Annual Reviews of the project; - any independent environmental audit as described in condition 6 above, and the Proponent's response to the recommendations in any audit; and (b) any other matter required by the Secretary; and (c) keep this information up-to-date, to the satisfaction of the Secretary.	14.01	All documents were observed to be present on the company website.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Administrative Conditions	A1.1	What the licence authorises and regulates	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.	8.01, 8.02, 8.03, 8.04, 8.05, 12.02, 12.03	The nature of the scheduled activity authorised and its scale is appropriate for the activities carried out on Site. No additional scheduled activities are triggered.	Compliant	NA	NA
EPL 13077	Administrative Conditions	A1.2	What the licence authorises and regulates	Notwithstanding A1.1, the scale of the land-based extractive activity authorised under this licence must not exceed 300,000 tonnes per annum, being the amount equivalent to the extraction limit approved by the Project Approval granted under Section 75J of the Environmental Planning and Assessment Act 1979 for Project Application 06_0030 on 24 November 2008 for the premises specified in A2.	8.01, 8.02, 8.03, 8.04, 8.05, 7.12, 7.13, 7.14	Reported annual production was 127,515–175,010 tonnes from 2021–2025, below the 300,000 tonne annual limit; 2026 YTD was projected below 160,000 tonnes.	Compliant	NA	NA
EPL 13077	Administrative Conditions	A2.1	Premises or plant to which this licence applies	The licence applies to the following premises: **Premises Details** **DUNLOE PARK** **POTTSVILLE-MOOBALL ROAD** **MOOBALL** **NSW 2483** **LOT 162 DP 755721**	1.01, 1.02, 2.01, 12.02	Site inspection, imagery and approval documents confirm operations were undertaken at the licensed Dunloe Park premises. The audit team notes that the 'Stage 2' area of the Site occur on Lots 1 and 2 DP780199. The EPL will need to be modified prior to Stage 2 commencing, to encompass the additional lots.	Compliant	NA	NA
EPL 13077	Administrative Conditions	A3.1	Other activities	This licence applies to all other activities carried on at the premises, including: **Ancillary Activity** crushing, grinding or separating	1.01, 1.02, 1.03	Extractive Activities' as a scheduled activity encompasses the extraction AND processing of extractive materials. The wash plant operation etc. would be covered by this scheduled activity. It is unclear what activity the 'Crushing, grinding and separating activities' and 'ancillary activities' relate to, however there is no harm to having these other parallel activities noted on the licence..	Compliant	NA	NA
EPL 13077	Administrative Conditions	A4.1	Information supplied to the EPA	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	1.01, 1.02, 1.03, 12.02, 12.03, 12.04	No material inconsistency was identified between observed operations and the approved proposal documents during the audit.	Compliant	NA	NA
EPL 13077	Discharges to Air and Water and Applications to Land	P1.1	Location of monitoring/discharge points and areas	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	1.03	Noted. No utilisation area(s) are specified.	Not triggered	NA	NA
EPL 13077	Discharges to Air and Water and Applications to Land	P1.2	Location of monitoring/discharge points and areas	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.	10.03, 10.09, 1.01, 2.01	The Soil and Water Management Plan, monitoring program and site records include the licensed water monitoring/discharge points. The points include two surface water discharge points and five groundwater monitoring points.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Limit Conditions	L1.1	Pollution of waters	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 8.01, 8.02, 8.03, 8.04, 8.05	Annual Reviews reported no surface-water discharges during 2021–2025, and no evidence of unlawful pollution of waters was identified.	Compliant	NA	NA
EPL 13077	Limit Conditions	L1.2	Pollution of waters	Exceedance of a quality limit specified in this licence for the discharge of TSS, pH or Oil and Grease from Point 1 or 2 or a volume limit for discharge from Point 1 or 2 is permitted if the discharge from Point 1 or 2 occurs solely as a result of rainfall at the premises exceeding a total of 82.5 millimetres over any consecutive five day period.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 8.01, 8.02, 8.03, 8.04, 8.05	There appears to have been two overflow events in the audit period where rainfall exceeded the trigger. No active/pumped discharges or discharges below the rainfall trigger occurred.	Compliant	NA	NA
EPL 13077	Limit Conditions	L2.1	Concentration limits	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.	10.03, 10.09, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11	No pumped/active discharge occurred during the audit period; therefore the discharge concentration limits were not triggered.	Not triggered	NA	NA
EPL 13077	Limit Conditions	L2.2	Concentration limits	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	10.03, 10.09, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11	No licensed discharge requiring assessment against the specified pH range was identified.	Not triggered	NA	NA
EPL 13077	Limit Conditions	L2.3	Concentration limits	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.	10.03, 10.09, 8.01, 8.02, 8.03, 8.04, 8.05	No discharge of an unlisted pollutant was identified during the audit period.	Not triggered	NA	NA
EPL 13077	Limit Conditions	L2.4	Concentration limits	Water and/or Land Concentration Limits	10.03, 10.09, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11	The water concentration limits were not triggered because no licensed discharge occurred during the audit period.	Not triggered	NA	NA
EPL 13077	Limit Conditions	L2.5	Concentration limits	The concentration limits in the table above do not apply to any discharge from the sediment pond(s) solely arising from a rainfall event exceeding 82.5 mm (the 90 percentile 5 day rain event) in total falling over any consecutive five day period.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 8.01, 8.02, 8.03, 8.04, 8.05	There appears to have been two overflow events in the audit period where rainfall exceeded the trigger. No active/pumped discharges or discharges below the rainfall trigger occurred.	Compliant	NA	NA
EPL 13077	Limit Conditions	L3.1	Waste	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	10.07, 1.01, 1.02, 1.03	No externally generated waste or resource-recovery material was received. Site-generated waste was managed off site; topsoil (when generated - no evidence of such during the audit period) is removed as a natural soil product following treatment for PASS and validation.	Compliant	NA	NA
EPL 13077	Limit Conditions	L4.1	Noise limits	Noise from the premises must not exceed an LAeq (15 minute) noise emission criterion of 48 dB(A), except as expressly provided by this licence.	7.01, 7.02, 7.03, 7.04, 7.05, 7.15, 10.01	Quarterly attended noise monitoring found compliance with the applicable criteria throughout the audit period, with no noise exceedance identified.	Compliant	NA	NA
EPL 13077	Limit Conditions	L4.2	Noise limits	Noise from the premises is to be measured at the nearest noise sensitive location to determine compliance with this condition.	7.01, 7.02, 7.03, 7.04, 7.05, 7.15, 10.01	Noise was assessed at the nearest relevant noise-sensitive receivers in accordance with the Noise Management Plan and monitoring reports.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Limit Conditions	L4.3	Noise limits	The noise emission limits identified in this section apply under calm meteorological conditions of wind speeds up to 3m/s at 10 metres above ground level, and temperature inversion conditions. *Note: The modification factors presented in Fact Sheet C of the NSW EPA Noise Policy for Industry 2017 shall also be applied to the measured noise level where applicable.* *Note: Noise sensitive locations means buildings used as a residence, hospital, school, childcare centre, places of public worship and nursing homes. A noise sensitive location includes the land within 30m of the building.*	7.01, 7.02, 7.03, 7.04, 7.05, 7.15, 10.01	Monitoring reports documented meteorological conditions and applied the relevant Noise Policy for Industry assessment requirements.	Compliant	NA	NA
EPL 13077	Limit Conditions	L5.1	Hours of operation	Activities covered by this licence must only be carried out between the hours of 0700 hrs to 1700 hrs Monday to Friday, and 0700 hrs to 1200 hrs Saturday, and at no time on Sundays and Public Holidays.	8.01, 8.02, 8.03, 8.04, 8.05, 7.12, 7.13, 7.14, 1.03	Annual Reviews, dispatch records and site interviews indicate activities were conducted within the licensed hours.	Compliant	NA	NA
EPL 13077	Limit Conditions	L5.2	Hours of operation	Exemptions to standard construction hours a) any maintenance work that is inaudible from neighbouring residences; b) emergency work to avoid the loss of lives or property, and/or to prevent environmental harm.	8.01, 8.02, 8.03, 8.04, 8.05, 1.03	No out-of-hours maintenance or emergency work relying on these exemptions was identified.	Not triggered	NA	NA
EPL 13077	Operating Conditions	O1.1	Activities must be carried out in a competent manner	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.	1.01, 1.02, 1.03, 10.07	Plant, materials and waste-management practices observed during the audit were orderly and competent, with no contrary evidence identified.	Compliant	NA	NA
EPL 13077	Operating Conditions	O2.1	Maintenance of plant and equipment	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.	1.01, 1.02, 1.03	Plant and equipment were observed to be well maintained and operating efficiently, with no material leaks or damage evident.	Compliant	NA	NA
EPL 13077	Operating Conditions	O3.1	Dust	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	1.01, 1.02, 1.03, 10.02, 7.06, 7.07, 7.08, 7.09, 7.1	Dust controls included sealed access, covered loads, a shaker grid and wet-down of trafficable areas. Annual-average deposited dust results were generally compliant.	Compliant	NA	NA
EPL 13077	Operating Conditions	O4.1	Processes and management	Any pond subject to dredging, or containing turbid water due to recent dredging must be maintained and operated to prevent discharges of any water from these ponds. A vegetated barrier must be used at all times to ensure that the active dredge and fines placement area / pond are isolated from stormwater drainage channels.	10.03, 1.01, 1.02, 1.03, 8.01, 8.02, 8.03, 8.04, 8.05	Pond management and flood procedures isolate active dredging and fines areas; operations are shut down before extreme events and no active discharge was identified. Bund walls between 0.3-0.6 m were in place between ponds.	Compliant	NA	NA
EPL 13077	Operating Conditions	O4.2	Processes and management	The licensee must maximise the diversion of run-on waters from lands upslope and around the site whilst land disturbance activities are being undertaken.	10.03, 1.01, 2.01	Site topographic data and observations on Site confirm that upslope run-on is diverted around disturbed areas where practicable.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Operating Conditions	O4.3	Processes and management	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.	1.01, 1.02, 1.03	Fuels, oils and liquid chemicals were observed in effective bunding, with spill controls and no evidence of leaks or spills.	Compliant	NA	NA
EPL 13077	Operating Conditions	O4.4	Processes and management	The licensee must ensure that sampling point(s) for water discharged from the Silt Pond(s) or Dredge Pond(s) are provided and maintained in an appropriate condition to permit: a) the clear identification of each Dredge Pond and Sediment Dam and discharge point(s); b) the collection of representative samples of the water discharged from the Silt Pond(s) and Dredge Pond(s); and, c) access to the sampling points(s) at all times by an authorised officer of the EPA.	10.03, 10.09, 1.01, 1.03	There is no requirement to physically mark the sample/discharge points in the ponds. They are marked on site maps, notably the map in the approved 2026 SWMP. However, no signage or physical marker was observed on Site. A physical marker would be a helpful addition for SIte management. The locations are readily accessible and identifiable and can be accessed easily by any EPA officer.	Compliant	Consider physical markers/signage identifying the two surface water sampling/discharge locations.	NA
EPL 13077	Operating Conditions	O4.5	Processes and management	The licensee must maximise the diversion of stormwater runoff containing suspended solids to sediment basins installed on the premises.	10.03, 1.01, 2.01	Runoff from within impacted/unsealed areas of the Site drain to the sediment basin (silt pond).	Compliant	NA	NA
EPL 13077	Operating Conditions	O4.6	Processes and management	All liquid chemicals, fuels and oils must be stored in tanks or containers inside suitable bund(s). Bund(s) are to be designed, constructed and maintained in accordance with the relevant Australian Standard for the Storage and Handling of Flammable and Combustible Liquids.	1.01, 1.02, 1.03	Fuels, oils and liquid chemicals were stored in suitable bunded areas consistent with the Australian Standard and maintained to a very high standard.	Compliant	NA	NA
EPL 13077	Operating Conditions	O5.1	Other operating conditions	The licensee must assess and manage any acid sulfate soil (ASS) and potential acid sulfate soil PASS) in accordance with the 1998 Acid Sulfate Soils Manual published by the NSW Acid Sulfate Soil Management Advisory Committee (ASSMAC).	10.03, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 1.03	Potential acid sulfate soil and fines are managed under the Soil and Water Management Plan, including prompt return of fines to the pond system to minimise oxidation. Reburial under the water table is a viable strategy under the ASS Manual that avoids the need for further assessment, treatment and validation.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M1.1	Monitoring records	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.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 10.09	Monitoring results required by the licence were recorded in the environmental monitoring datasets and reports.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M1.2	Monitoring records	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.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 10.09, 13.01	Monitoring records spanning the audit period were available and legible, demonstrating retention beyond four years for the earliest records.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M1.3	Monitoring records	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.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 10.09	Monitoring records include sample dates, locations and sampling details required to identify the collection event. Monitoring summaries do not include the name of the sampler but records are available.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Monitoring and Recording Conditions	M2.1	Requirement to monitor concentration of pollutants discharged	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:	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 10.09, 8.09	Special frequency 1' was not triggered during the audit period. Hence only the annual monitoring of groundwater bores was required. Annual monitoring (or, on occasions, higher frequency monitoring) has been completed throughout the audit period. The 2022 EPA Annual Return stated that a non compliance with this condition occurred. However, on review of the annual return, the 'non-compliance' reported related to exceedances of background water quality criteria for groundwater monitoring points. The EPL requires these points to be monitored, but does not place any water quality limits on them. Therefore, the non-compliance reported for the 2021-22 EPA Licence year is not a non-compliance for the purposes of this audit.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M2.2	Requirement to monitor concentration of pollutants discharged	Water and/ or Land Monitoring Requirements	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 10.03, 10.09	As above	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M2.3	Requirement to monitor concentration of pollutants discharged	Special Frequency 1 means: sampling once <24 hours prior to; and, sampling the discharge daily during, each discharge event arising from rainfall of less than 82.5mm falling in total over a period of up to five days duration.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 8.01, 8.02, 8.03, 8.04, 8.05	'Special frequency 1' was not triggered during the audit period.	Not triggered	NA	NA
EPL 13077	Monitoring and Recording Conditions	M3.1	Testing methods - concentration limits	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	7.06, 7.07, 7.08, 7.09, 7.1, 7.11, 10.09	The monitoring program and laboratory results provide evidence that water analyses were undertaken using the prescribed or approved methods.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M4.1	Environmental monitoring	The licensee is required to install and maintain a rainfall depth measuring device.	10.03, 10.09, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11	A rainfall measuring device is installed and maintained.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M4.2	Environmental monitoring	Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day.	10.03, 10.09, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11	Available monitoring records include daily rainfall information used for site water and discharge management.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M4.3	Environmental monitoring	The rainfall monitoring data collected in compliance with Condition M4.2 can be used to determine compliance with L1.2.	10.03, 10.09, 7.06, 7.07, 7.08, 7.09, 7.1, 7.11	This clause permits use of rainfall records for L1.2; no discharge relying on L1.2 was identified.	Not triggered	NA	NA
EPL 13077	Monitoring and Recording Conditions	M5.1	Recording of pollution complaints	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.	9.01, 9.02, 9.03, 9.04, 9.05, 9.06	Annual complaints registers were maintained for each year of the audit period and were available for review. No community complaints were received during the audit period.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M5.2	Recording of pollution complaints	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.	9.01, 9.02, 9.03, 9.04, 9.05, 9.06	No complaints were made during the audit period and hence, the requirement to capture these details has not been triggered. However, the register/complaints form do not appear to have the requisite fields to meet the EPL requirements in the event that a complaint was recieved.	Compliant	Revise the Complaint Register and/or the complaint record form to include all fields and details required by the EPA licence.	NA
EPL 13077	Monitoring and Recording Conditions	M5.3	Recording of pollution complaints	The record of a complaint must be kept for at least 4 years after the complaint was made.	9.01, 9.02, 9.03, 9.04, 9.05, 9.06	No complaints have been received.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Monitoring and Recording Conditions	M5.4	Recording of pollution complaints	The record must be produced to any authorised officer of the EPA who asks to see them.	9.01, 9.02, 9.03, 9.04, 9.05, 9.06	The complaints registers were available for audit and capable of being produced to an authorised EPA officer. No requests to produce complaints have been made.	Not triggered	NA	NA
EPL 13077	Monitoring and Recording Conditions	M6.1	Telephone complaints line	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.	1.01, 1.03, 14.01	A complaints telephone number was displayed on the site entrance sign and public website and was available during operating hours.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M6.2	Telephone complaints line	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.	1.01, 14.01	The site sign and public website notified the community of the complaints line and how to make a complaint.	Compliant	NA	NA
EPL 13077	Monitoring and Recording Conditions	M6.3	Telephone complaints line	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	13.02, 13.01	The three-month commencement period expired before this audit period; the ongoing requirements are assessed under M6.1 and M6.2.	Not triggered	NA	NA
EPL 13077	Monitoring and Recording Conditions	M7.1	Other monitoring and recording conditions	For the purposes of monitoring for compliance with the noise limit conditions of this licence (condition L4) noise emitted from the premises must be measured or computed at 30 metres from the nearest residential dwelling/s over a period of 15 minutes using the “FAST” response on the sound level meter. A modifying factor correction must be applied for tonal, impulsive, or intermittent noise in accordance with the document Noise Policy for Industry (NSW EPA, 2017).	7.01, 7.02, 7.03, 7.04, 7.05, 7.15, 10.01	Noise monitoring reports used 15-minute attended measurements, using the 'Fast' response on the meter. Measurements were taken at/in proximity to relevant receivers and applied modifying-factor and meteorological corrections.	Compliant	NA	NA
EPL 13077	Reporting Conditions	R1.1	Compliance, and annual reporting requirements	The licensee must supply the EPA, via the EPA's online digital portal, the following details of any non-compliance with the conditions of the licence within 21 days after the licensee becomes aware of the non-compliance: a.the date the licensee became aware of the non-compliance; b.the date(s) the non-compliance occurred, including if the non-compliance is continuing; c.whether the non-compliance relates to air, water/land, noise or waste matters (if applicable); d.whether the non-compliance relates to a pollution incident; e.the licence condition(s) not complied with; f.a summary of particulars of the non-compliance, including (if known): i.the location where the non-compliance occurred; ii.the duration of the non-compliance; iii. if the non-compliance is continuing, the suspected end date of the non-compliance; g.the cause or suspected cause of the non-compliance; h.any action taken, or proposed to be taken, to mitigate the effects of the non-compliance; and i.any action taken, or proposed to be taken, to prevent a recurrence of the non-compliance	8.01, 8.02, 8.03, 8.04, 8.05	**Previous requirement to submit annual returns:** We note that Condition R1.1 recently changed to align with the NSW EPA's new 'real-time' reporting of EPL non compliances. For the majority of the audit period (up to 4 June 2026), annual returns were required to be submitted each year. A review of the POEO public register confirms that for the period in which they were required, Annual Returns were submitted and submitted on time (by 9 August). **Current requirement - real time reporting:** Non-compliances with the EPL Conditions are to be reported within 21 days of becoming aware of the breach in future, rather than once at the end of the licence year. No non compliances requiring report occurred between 5 June 2026 (the date on which the current/varied EPL was issued) and the end of the audit period (13 July 2026).	Compliant	NA	NA

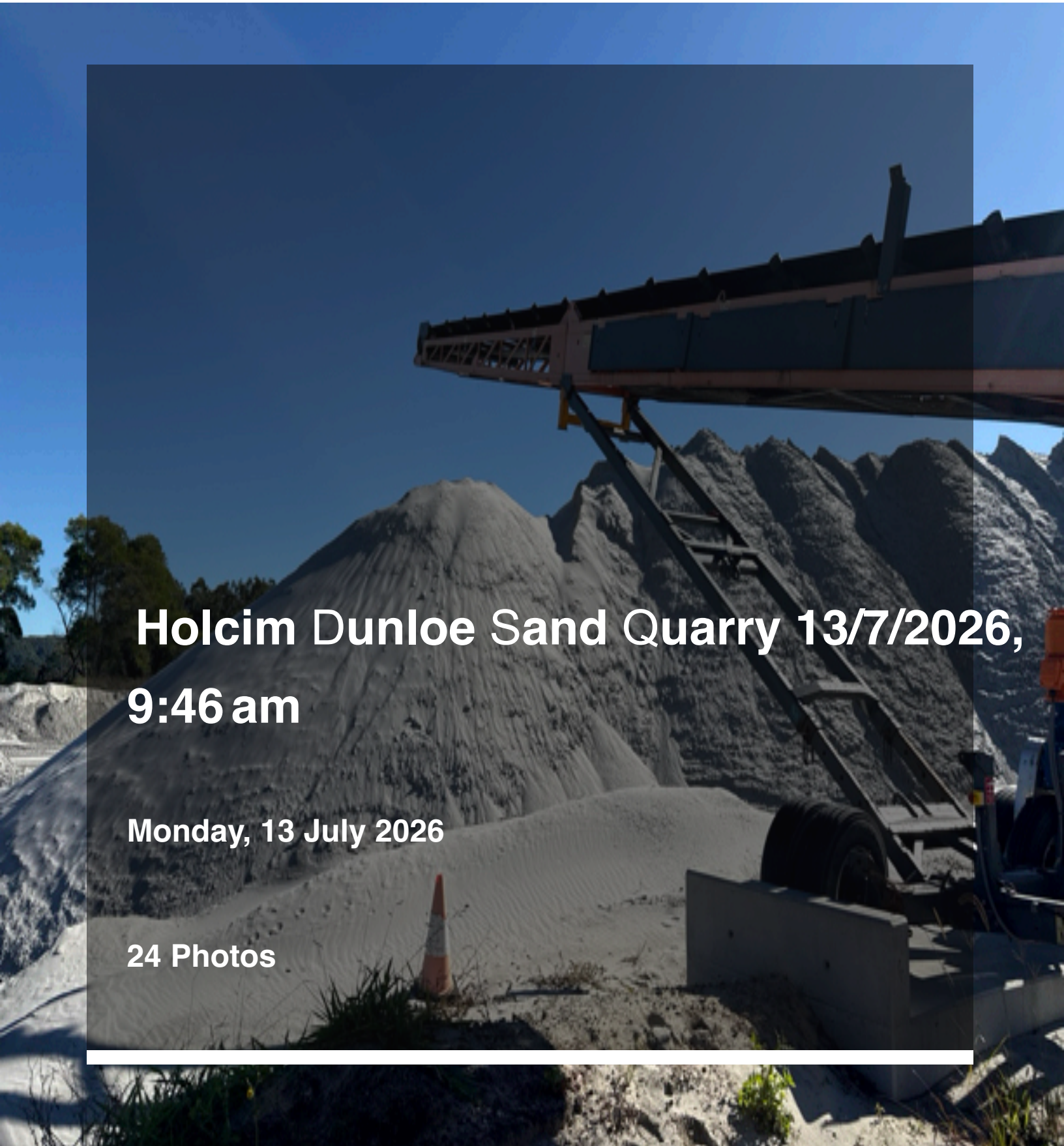
Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Reporting Conditions	R1.2	Compliance, and annual reporting requirements	The EPA may make a written request for further details in relation to each non-compliance reported in accordance with Condition R1.1. The licensee must provide such further details to the EPA, via the EPA's online digital portal, within the time specified in the request.	8.01, 8.02, 8.03, 8.04, 8.05	No such request has been made.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R1.3	Compliance, and annual reporting requirements	Condition R1.1 does not apply where a non-compliance with a licence condition has been identified by the EPA as part of an EPA environmental compliance audit.	1.03	No EPA compliance audit has occurred in the audit period.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R1.4	Compliance, and annual reporting requirements	By 05 August 2026, the licensee must supply to the EPA, via the EPA's online digital portal the details required in Condition R1.1 for any non-compliance with the conditions of the licence that occurred: i.after the date the licensee supplied their last Statement of Compliance - Licence Conditions to the EPA, and ii.before the date of the notice of variation of licence that added this condition to this Licence.	1.03	No non compliances requiring reporting have been identified in the transitional period to the end of the audit period.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R1.5	Compliance, and annual reporting requirements	If the licensee undertakes monitoring as a result of a licence condition, the licensee must supply to the EPA a summary of the results of the pollution monitoring data in respect of each reporting period. The summary must be provided as a Microsoft Excel file, formatted with the following column headings: a.EPA point identification number; b.pollutant; c.unit of measure; d.number of samples required; e.number of samples collected and analysed; f.lowest sample value; g.mean of sample values; and h.highest sample value. The pollution monitoring data summary for the reporting period must be supplied to the EPA via the EPA's online digital portal by the "due date", as defined in the dictionary at the end of this licence.	1.03, 14.04	The 'Due date' as defined in the EPL is 60 days after the end of each 'Reporting period', which is defined as the annual anniversary date after the licence issue date. This means that the monitoring summary must be submitted in accordance with condition R1.5 within 60 days of the anniversaty date each year (10 June). The first monitoring summary under this new condition was therefore due by 10 August 2026, which is outside of the audit period.	Not triggered	Review reporting system reminders and processes to ensure that triggers are set to send the annual monitoring summary to the NSW EPA by no later than 10 August each year.	NA
EPL 13077	Reporting Documents	R2.1	Reporting documents	The licensee must also include the following information with the Annual Return: •A statement detailing the total volume of material extracted from the quarry for the reporting period; and •The total volume of extracted material transported from the premises for the reporting period.	1.03, 14.04, 8.08, 8.09, 8.1, 8.11, 4.09	No evidence has been provided to confirm that this information was provided to the EPA with annual returns, in a format that aligned with the EPL reporting year. There is no standard field in the Annual Return for this information, and it would need to be supplied as a separate email or other correspondence. Links were given in the annual return to the company website, which contain calendar year production data; however, no data was available to the EPA to confirm production for the EPL reporting year. This condition no longer appears to be relevant as Annual Returns are no longer required by the EPA. This condition should be reworded by the EPA to align with the monitoring summary at Condition R1.5. The Proponent should submit the data required by this condition along with the monitoring summary required at R1.5.	Non-compliant	NA	The Proponent has already clarified the requirements of this condition, now that Annual Returns are no longer required. The EPA notes that this information should be submitted by the 'licence due date' as defined in the EPL and should be submitted via the EPA Econnect system.
EPL 13077	Reporting Conditions	R3.1	Notification of environmental harm	Notifications must be made by telephoning the Environment Line service on 131 555.	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	No incident causing or threatening material environmental harm was identified during the audit period; telephone notification was therefore not triggered.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	Reporting Conditions	R3.2	Notification of environmental harm	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.*	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	No incident causing or threatening material environmental harm was identified; the seven-day written notification requirement was not triggered.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R4.1	Written report	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.	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	No evidence was identified of an EPA request for a written report concerning an event causing or likely to cause material environmental harm.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R4.2	Written report	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.	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	No EPA written-report request was identified, so the inquiry and report-supply obligation was not triggered.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R4.3	Written report	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.	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	No EPA written-report request was identified during the audit period; prescribed report contents were therefore not triggered.	Not triggered	NA	NA
EPL 13077	Reporting Conditions	R4.4	Written report	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.	1.03, 8.01, 8.02, 8.03, 8.04, 8.05	No EPA request for further details was identified during the audit period.	Not triggered	NA	NA
EPL 13077	General Conditions	G1.1	Copy of licence kept at the premises or plant	A copy of this licence must be kept at the premises to which the licence applies.	1.01, 1.02, 1.03, 14.01	A current copy of EPL 13077 was available for the site audit and an EPA inspection occurred in 2025.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 13077	General Conditions	G1.2	Copy of licence kept at the premises or plant	The licence must be produced to any authorised officer of the EPA who asks to see it.	1.03	The site underwent an EPA inspection in 2025 and no evidence was identified that the licence was produced to EPA officers as requested.	Compliant	NA	NA
EPL 13077	General Conditions	G1.3	Copy of licence kept at the premises or plant	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	1.01, 1.03, 14.01	The current licence was available at the premises for inspection by site personnel and agents.	Compliant	NA	NA

Appendix 6 Not used

Appendix 7 Photo log of Site Inspection



Holcim Dunloe Sand Quarry 13/7/2026, 9:46 am

Monday, 13 July 2026

24 Photos



Photo 1 Extraction Area - Active extraction area observed with defined excavation boundaries. Working surfaces appeared stable with no evidence of uncontrolled sediment discharge or environmental harm. Extraction activities were contained within the approved operational area.



Photo 2 Extraction Area - Extraction face and haul road inspected. Site demonstrated good housekeeping with clearly defined operational areas and no evidence of erosion extending beyond the extraction footprint.



Photo 3 Extraction Area - View of the extraction area confirming active sand mining operations. Internal haul roads were maintained and no off-site sediment migration or dust accumulation was observed during the inspection.



Photo 4 Perimeter bund inspected and found to be well established, providing an effective barrier to contain stormwater runoff and sediment within the operational area. Vegetation on the outer batter contributes to long-term stability.



Photo 5 Additional view of the active extraction area confirming that sand extraction activities were being undertaken within the approved quarry footprint. Extraction batters appeared stable, operational surfaces were well maintained, and no evidence of uncontrolled erosion, sediment migration, or adverse environmental impacts was observed. The inspection confirmed that extraction activities remained contained within the designated operational area and were being managed in accordance with the site's environmental management requirements

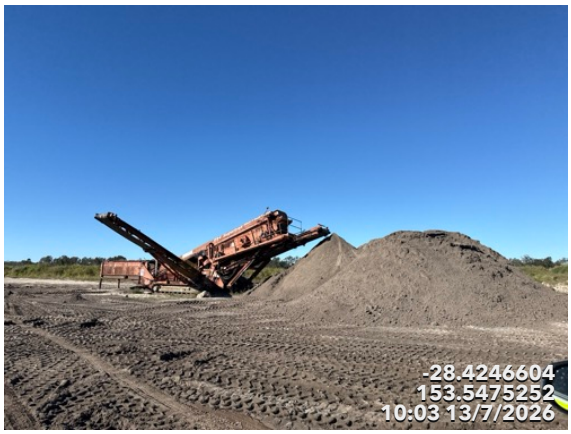


Photo 6 Topsoil product stockpile inspected. The stockpiled material is a processed topsoil product prepared for commercial sale and landscaping applications.



Photo 7 Diesel Fuel Tank for Dredging Activities - Diesel fuel storage tank supporting dredging operations was inspected. The fuel storage infrastructure appeared to be maintained in good condition and positioned within the designated operational area. No evidence of fuel leaks, staining, or environmental pollution was observed at the time of inspection, indicating that fuel storage was being managed in accordance with the site's environmental management requirements.



Photo 8 Concrete Sand Product Stockpile - The processed sand product was stored within the designated stockpile area for commercial distribution. Stockpile management was observed to be orderly, with well-defined storage areas and stable surfaces that minimise the potential for erosion, dust generation, and material loss.



Photo 9 Processing plant inspected. Material handling equipment was operating within designated infrastructure with no visible evidence of spills, excessive dust emissions or environmental impacts.



Photo 10 Plant infrastructure and wash plant area inspected. Pipes and associated plant equipment appeared maintained and operational. No leaks, spills or uncontrolled discharge were observed.



Photo 11 Silt Pond - Sediment retention pond inspected. Water quality appeared visually clear with sufficient storage capacity maintained. The pond was functioning as designed to retain suspended sediments. No discharge was noted as per the interview.



Photo 12 Silt Pond - Additional view of sediment pond confirming stable embankments, adequate freeboard and no evidence of erosion, overtopping or uncontrolled sediment release.



Photo 13 Conveyor and stockpile area inspected. Material transfer systems were operating within contained areas and stockpiles were managed to minimise dust generation and runoff.



Photo 14 Product stockpile beneath conveyor inspected. Stockpile management was satisfactory with material stored within designated operational areas. No evidence of off-site impacts was observed.



Photo 15 Site amenities and water storage area inspected. Rainwater tanks and site buildings were maintained in good condition with vegetation surrounding the area stabilised and well managed.



Photo 16 Spill KitSpill response equipment (spill kit) inspected. A fully stocked spill kit was observed strategically located within the operational area to provide a rapid response to potential fuel, oil or chemical spills. The spill kit was readily accessible to personnel and appropriately positioned near areas where hazardous substances are handled, demonstrating preparedness for pollution prevention and compliance with the site's spill response procedures and Environmental Management Plan.



Photo 17 Workshop and maintenance container inspected. General housekeeping was satisfactory with equipment organised to minimise environmental risks. No evidence of fluid leaks or uncontrolled waste storage was observed.



Photo 18 Fuel and chemical storage within maintenance facility inspected. Intermediate Bulk Container (IBC) and dispensing equipment appeared to be managed appropriately with spill response equipment available.

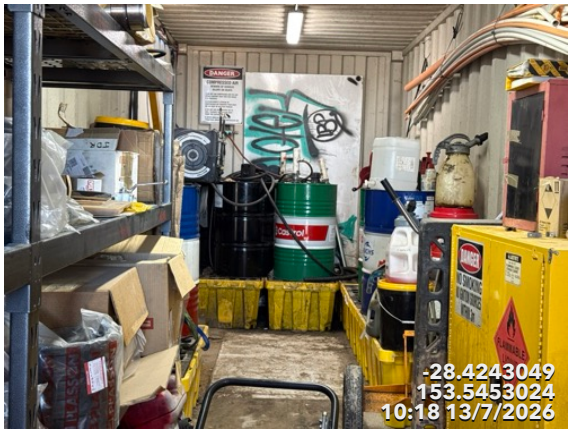


Photo 19 Dangerous goods and waste oil storage area inspected. Drums were stored within bunded spill containment capable of retaining potential leaks, demonstrating compliance with hazardous substance storage requirements



Photo 20 Product stockpile and operational yard inspected. Working surfaces were maintained in a stable condition with no visible evidence of excessive dust generation or sediment accumulation.



Photo 21 Operational stockpile area inspected. Stockpile management appeared consistent with approved site operations and maintained clear separation from surrounding vegetation and drainage areas.



Photo 22 Site water management infrastructure inspected. Rainwater tanks and associated drainage appeared functional with surrounding grounds stabilised and free from erosion.

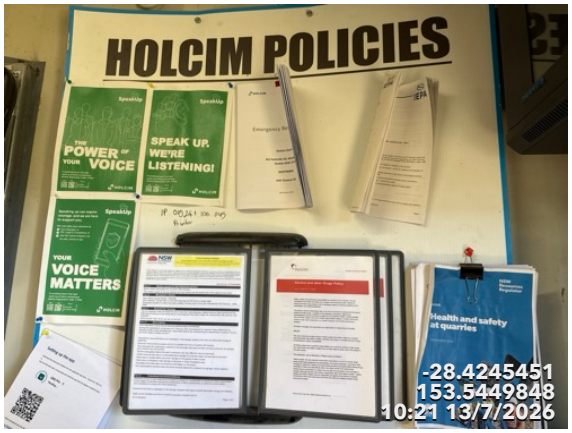


Photo 23 Environmental Compliance Noticeboard (EPL Display)- The site environmental compliance noticeboard was inspected and found to prominently display the Environment Protection Licence (EPL), together with other relevant environmental information, operational procedures and site notices. The EPL was readily accessible to site personnel and visitors, demonstrating compliance with licence display requirements and promoting awareness of environmental obligations.



Photo 24 Heavy vehicles exiting the site were observed with loads fully covered, demonstrating compliance with transport management requirements to prevent dust generation and material loss during transport.

Appendix 8 Documentary Evidence File

NOTE: We acknowledge the Department's preference regarding the presentation of evidence in audit tables – that relevant items of evidence are named in full in each row against the relevant condition. 4Pillars has taken a slightly different approach in this report – an index of evidence has been created and references in the audit table are to the Exhibit ID. The benefits in doing this are: no risk of typos/errors where the same piece of evidence is referred to in multiple conditions, creation of a data file for the audit that can be used as a point of reference in the future and improved legibility of the audit table.

The Evidence File

The Evidence File is provided as a OneDrive folder. **Specific recipients (including compliance@planning.nsw.gov.au) have been provided access** to this folder. Other recipients can be added on request. Please contact hello@4Pillars.com.au or visit www.4Pillars.com.au for alternative contact details.

Please note the items highlighted red below are commercially sensitive and are not provided in the shared file.

Evidence File Link: A_Evidence File- Dunloe

Exhibit ID	Description
1.00	**Photographs from site inspection**
1.01	Photo record of site inspection with notes
1.02	Collated photos from Site inspection
1.03	Site inspection and interview anecdotal evidence
2.00	**Surveys, maps and site plans**
2.01	Nearmap aerial imagery of the Site covering the Audit Period - 2021-2025
2.02	Topographic/bathymetric survey dated 20/5/2025
3.00	**Records, inspections, operational data**
3.01	Audit team observations of weather station and gauge on Site.
4.00	**Correspondence with regulatory agencies**
4.01	DPHI acceptance of rehab bond recalculation from May 2021. Letter dated 27/9/2021.
4.02	DPHI letter regarding Annual Review 2023. Dated 8/4/2024.
4.03	DPHI letter regarding Annual Review 2024. Dated 14/4/2025
4.04	Holcim letter to DPHI regarding Management Plan Review following submission of 2024 Annual Review. Dated 30/6/2025
4.05	DPHI letter regarding Annual Review 2025. Dated 5/5/2026
4.06	Holcim letter to DPHI regarding Management Plan Review following submission of 2025 Annual Review. Dated 29/6/2026
4.07	Holcim letter to DPHI regarding Management Plan Review following submission of 2022 Annual Review. Dated 30/6/2023
4.08	Portal submission record for the letter at item 4.06 above.
4.09	Email dated 23 July 2026 from NSW EPA to The Proponent explaining requirements for Condition R2.1
5.00	**CCC Documents**
5.01	CCC Minutes - July 2021
5.02	CCC Minutes - December 2021
5.03	CCC Minutes - July 2022
5.04	CCC Minutes - February 2023
5.05	CCC Minutes - July 2023
5.06	CCC Minutes - February 2025
5.07	CCC Minutes - July 2025
5.08	CCC Minutes - February 2026
5.09	CCC minutes June 2024
6.00	**Planning agreements, legal instruments and contracts**
6.01	Approval to Operate On-Site Sewage Management System at Lot 162 DP 755721; Warwick Park Road WOOYUNG 15/9/2026 exp 15/9/2032 or on transfer of property to another party.
7.00	**Environmental Monitoring Reports and Data**

Exhibit ID	Description
7.01	Noise Monitoring Reports - 2021
7.02	Noise Monitoring Reports - 2022
7.03	Noise Monitoring Reports - 2023
7.04	Noise Monitoring Reports - 2024
7.05	Noise Monitoring Reports - 2025
7.06	Environmental Monitoring Data - 2021
7.07	Environmental Monitoring Data - 2022
7.08	Environmental Monitoring Data - 2023
7.09	Environmental Monitoring Data - 2024
7.10	Environmental Monitoring Data - 2025
7.11	Environmental Monitoring Data - 2026 YTD
7.12	Truck movements - 2025 Q4
7.13	Truck movements - 2024 Calendar year
7.14	Truck movements - 2025 Calendar year
7.15	Noise Monitoring Report - monitoring date 30 June 2026. Report date 31/8/2026
7.16	Noise Monitoring Report - monitoring date 30 March 2026. Report date 21/8/2026
8.00	**Reports to regulatory authorities**
8.01	2021 Annual Review
8.02	2022 Annual Review
8.03	2023 Annual Review
8.04	2024 Annual Review
8.05	2025 Annual Review
8.06	Submission record to NSW EPA for 2023 Annual Review, sent to main mailbox. Dated 3/4/2024
8.07	Submission record to Tweed Council for 2025 Annual Review. Dated 26/6/2026
8.08	EPL Annual Return 2024-2025
8.09	EPL Annual Return 2021-2022
8.10	EPL Annual Return 2022-2023
8.11	EPL Annual Return 2023-2024
9.00	**Complaints and stakeholder management**
9.01	Complaints Register - 2021
9.02	Complaints Register - 2022
9.03	Complaints Register - 2023
9.04	Complaints Register - 2024
9.05	Complaints Register - 2025
9.06	Complaints Register - 2026
10.00	**Management Plans**
10.01	Noise Management Plan - July 2020
10.02	Air Quality Management Plan - February 2020
10.03	Soil and Water Management Plan - March 2026
10.04	Landscape Management Plan - April 2022
10.05	Aboriginal Cultural Heritage Management Plan, dated December 2019
10.06	Traffic Management Plan - May 2019
10.07	Waste Management Plan - July 2020
10.08	Environmental Management Strategy - July 2021
10.09	Environmental Monitoring Program - July 2021
10.10	DPHI Approval of Soil and Water Management Plan REV9 30/3/2026. Letter dated 9/4/2026.
10.11	Submission of Soil and Water Management Plan REV9 to Tweed Council for records. Email dated 31/8/2026 (outside of audit period)
10.12	Pollution Incident Response Management Plan dated September 2025
11.00	**Penalties, Fines or Notices**
NA	Not used

Exhibit ID	Description
12.00	**Environmental Impact Assessment documents**
12.01	MOD 1 Environmental Assessment report dated August 2009
12.02	Original DA Environmental Assessment report dated September 2007
12.03	MOD 2 Environmental Assessment report dated July 2017
12.04	MOD 2 Response to Submissions report dated November 2017
13.00	**Previous IEAs**
13.01	2021 IEA dated 14/02/2022
13.02	2016 IEA dated June 2016
14.00	**Miscellaneous documents**
14.01	Website export (https://www.holcim.com.au/dunloe-sand) - 9 July 2026
14.02	Calculation spreadsheet for rehabilitation bond dated 25/5/2021.
14.03	Not used
14.04	Export of POEO Public register
14.05	Wash Plant - Statement of Compliance - Electrical work - dated 21/7/2025
14.06	Wash Plant - Occupation Certificate no. 241450/01 - Construction of a sand washing plant - McKenzie Group dated 6/8/2025
14.07	Wash Plant - terex design drawings
14.08	Wash Plant - Certificate of structural compliance - footings, foundation, access stairway - dated 28/07/2025
14.09	Wash Plant - certificate of design compliance for screen structure with relevant AS - dated 21/3/2025
14.10	Wash Plant - certificate of design compliance for sand dewatering system with relevant AS - dated 21/3/2025
14.11	Sundry tax inovice dated 23/6/2025 for 'Sixth installment of deferred Tweed Roads Contribution Plan for DA08/1247.
14.12	Payment record for invoice at 14.11
14.13	Sundry tax inovice dated 15/06/2022 for 'Third installment of deferred Tweed Roads Contribution Plan for DA08/1247.
14.14	Payment record for invoice at 14.13
15.00	**Not used**

Proponent's response to audit recommendations and observations

Recommendations

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail	Proponent's Response
Project Approval 06_0030							
Sch 3 (7A)	Within three months of the approval of Modification 2, the Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared by a suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with the EPA; (c) describe the measures to be implemented to ensure: (i) compliance with the air quality criteria and operating conditions in this approval; (ii) best practice management is being employed; and (iii) air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events; (d) describe the air quality management system; and (e) include an air quality monitoring program that: (i) is capable of evaluating the performance of the project against the air quality criteria; (ii) adequately supports the air quality management system; and (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. The Project must implement the Air Quality Management Plan as approved by the Secretary.	10.02, 13.01, 1.03, 7.06, 7.07, 7.08, 7.09, 7.1, 10.11, 10.02, 8.01, 8.05, 1.01, 1.02	Operations are conducted in accordance with the February 2020 Air Quality Management Plan (the AQMP). The AQMP was previously assessed (in the 2021 IEA) to satisfy the requirements of this Condition, however was not submitted within three months of the approval of Modification 2 (approved in November 2018) and this Condition was therefore considered Non-compliant. Noting that the timeframe for submission falls outside (prior to) this Audit Period, this is considered not triggered for this Audit Period. Implementation of the AQMP has been broadly achieved, however there were a number of instances where samples were contaminated, unable to be collected due to damage to gauges etc. Instances where the averaging period was extended due to inability to collect gauges due to extreme weather etc. are not regarded as non compliances, as a monitoring result could still be obtained. A strict view of compliance with implementing the AQMP would require a valid result to be collected each month. It is arguable that damage to gauges and cross-contamination are not 'non-compliances' with implementation as Holcim made all reasonable efforts to implement the AQMP. However, considering Holcim has self-reported and identified these missed measurements as non-compliances in Annual Reviews and the Department has accepted/reiterated them as non compliances in their reply correspondence, the audit team records the 13 missed measurements (13 out of 240; 5.5% of required measurements) in the audit period as a non-compliance. Holcim achieved almost 95% compliance with measurement frequency.	Non-compliant	Recommendation 1.	Continue to implement the AQMP, including making best efforts to ensure dust gauges maintained and protected from contamination, noting some damage and contamination events are unavoidable. Consider in future whether such events are in fact a non-compliance for the purpose of Annual Reviews.	Holcim will seek advice from DPHI by 13/10/2027
Sch 3 (12)	The Proponent must manage on-site sewage to the satisfaction of Council and EPA. The facility must comply with the requirements of the *Environment and Health Protection Guidelines – On-site Sewage Management for Single Households (1998)*.	13.01, 6.01	Tweed Shire Council issued an approval for the On-Site Sewage system in July 2017, however the approval lapsed around 2023. Since then, we are advised the SIte has been working with Council to reinstate the approval. Plumber is now preparing documents for Council to get a renewed permit/approval for the OSSS. The system tanks were observed to be above ground with no evidence of leakage. The disposal area showed no signs of effluent on the surface and vegetation was maintained. There is insufficient evidence that Holcim is managing on-site sewage to the 'satisfaction' of Council and the NSW EPA. A permit/approval for the OSSS is the appropriate mechanism to demonstrate this and should be reinstated as soon as possible.	Non-compliant	Recommendation 2.	The audit team notes that the AWTS approval has been granted dated 15/9/2026. This audit recommendation has been closed out prior to the audit report being finalised.	Closed. AWT approval now granted by the council.
Sch 5 (1B)	Within 3 months of the submission of: (a) an incident report under condition 4 below; (b) an Annual Review under condition 5 below; (c) an audit report under condition 6 below; and (d) any modifications to this approval, the Proponent must review the strategies, plans and programs required under this approval, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary. *Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the project.*	8.01, 8.02, 8.03, 8.04, 8.05, 4.04, 4.06, 4.07	Five Annual Reviews were submitted during the Audit Period, for 2021-2025. The 2021 Audit Report was completed in February 2022 and submitted shortly after. No incidents occurred in the audit period and there were no further modifications to the Consent. Evidence has been provided of review of management plans and notification of the Department following the 2022, 2024 and 2025 Annual Reviews. No evidence has been sighted in relation to review of management plans specifically following submission of the 2021 IEA in early 2022 or following submission of the 2021 Annual Review.	Non-compliant	Recommendation 3.	Ensure that management plans are appropriately reviewed following all triggers, including audits and annual reviews.	Noted. Holcim will complete review of the management plans following the 2026 Annual Review.

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail	Proponent's Response
Sch 5 (7)	Within three months of commencing an Independent Environmental Audit, or within another timeframe agreed by the Secretary, the Proponent 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, and a timetable for the implementation of the recommendations. The recommendations must be implemented to the satisfaction of the Secretary.	13.01	The 2021 IEA was commenced (as per the explanation above) on 20 July 2021. Therefore, in order to comply with this condition, the report would need to be submitted to the Department by 20 October 2021. The 2021 IEA report was not completed until February 2022. No extension correspondence or other evidence has been sighted that confirms more time was allowed for submission. The 2026 IEA was commenced on 13 July 2026 and is due 13 October 2026.	Non-compliant	Recommendation 4.	Ensure that future audit reports are complete and submitted within 3 months of commencement of the audit (commencement taken to be the date on which the site inspection is completed).	Noted. This Audit is submitted on 13/10/2026 which aligns with Sch 5 (7).
EPL 13077							
R2.1	The licensee must also include the following information with the Annual Return: •A statement detailing the total volume of material extracted from the quarry for the reporting period; and •The total volume of extracted material transported from the premises for the reporting period.	1.03, 14.04, 8.08, 8.09, 8.1, 8.11	No evidence has been provided to confirm that this information was provided to the EPA with annual returns, in a format that aligned with the EPL reporting year. There is no standard field in the Annual Return for this information, and it would need to be supplied as a separate email or other correspondence. Links were given in the annual return to the company website, which contain calendar year production data; however, no data was available to the EPA to confirm production for the EPL reporting year. This condition no longer appears to be relevant as Annual Returns are no longer required by the EPA. This condition should be reworded by the EPA to align with the monitoring summary at Condition R1.5. The Proponent should submit the data required by this condition along with the monitoring summary required at R1.5.	Non-compliant	Recommendation 5.	The Proponent has already clarified the requirements of this condition, now that Annual Returns are no longer required. The EPA notes that this information should be submitted by the 'licence due date' as defined in the EPL and should be submitted via the EPA Econnect system.	Closed. On 23/07/26 the EPA via email to Holcim clarified that the Annual Return for the site is no longer required.
IEA OBSERVATIONS							
Project Approval 06_0030 **Sch 2 (4)**	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any reports, strategies, plans, programs, reviews, audits or correspondence that are submitted in accordance with the conditions of this approval; (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with the conditions of this approval; and (c) the implementation of any actions or measures contained in these documents.	4.02, 8.04, 8.05	The Department's response to the 2023 Annual Review directed Holcim to split out Incidents and Non-compliances in future Annual Reviews. The 2024 AR acknowledged this requirement and referred to sections 6 and 12. 2025 did not explicitly reference the requirement but followed the same format at 2024. Section 6 (Environmental Performance) notes and discusses non-compliances where they occur. Section 12 continues to be referenced as 'Incidents and Non-compliances'. In 2024, section 12 lists invalidated dust samples and 2025 also lists invalidated dust results. An 'Incident' is defined in the Consent. A missed measurement is not an 'incident' and should be reported as a non-compliance only. Although the Department's direction has been acknowledged and complied with, in that a change has been made to future reports, the response could be improved. No other directions or requests have been identified. The previous audit identified this condition as non-compliant on the basis of previous audit recommendations not being implemented. This audit team's view of this condition is that unless the Secretary has instructed Holcim to implement the findings of previous audits, non completion of previous recommendations would not trigger a non-compliance with this particular condition. We are not aware of any such specific instruction from the Planning Secretary following the 2021 audit.	Compliant	Observation 1.	Section 12 should be revised in future Annual Returns to be titled 'Incidents' and the corresponding table should contain Incidents as defined in the Consent only. A separate table in Section 6 or elsewhere could be used for tabulating non-compliances that do not meet the criteria for an 'Incident'. The Department has specified that missed measurements are not 'incidents'. Refer to the latest version of the Post Approval Compliance Reporting Guideline (March 2026 at the time of writing).	Holcim to revise section 12 of the AEMR in the next annual review due by 30/03/2027.
Project Approval 06_0030 **Sch 5 (10)**	Within 1 month of the approval of any plan/strategy/program required under this approval (or any subsequent revision of these plans/strategies/programs), or the completion of any independent environmental audit or Annual Review, the Proponent must: (a) provide a copy of the relevant document/s to Tweed Shire Council and relevant agencies; and (b) ensure that a copy of the relevant document/s is made publicly available on site and/or at the Proponent's regional office, to the satisfaction of the Secretary.	8.06, 8.07, 10.11	a) Evidence has been sighted of submission of the 2025 Annual Review and the 2026 Soil and Water Management Plan to Tweed Shire Council and the 2023 Annual Review to the NSW EPA. Anecdotal evidence suggests that previous annual reviews and updated plans were also submitted, however every instance has not been verified with documentary evidence. Council is engaged in the project and the website provides a sound and up to date record of documents. b) Documents are available on the Company website. RFI: Evidence of provision within 1-month timeframe.	Compliant	Observation 1.	Review internal processes and reminders/automations to ensure that Council and other relevant agencies are provided copies of updated plans, audits and Annual reviews. Consider a checklist or similar standardised form for managing administrative requirements for these documents.	Internal processes to be reviewed to improve documentation and ensure the relevant agencies are sent required documents. 4/11/2027
EPL 13077 O4.4	The licensee must ensure that sampling point(s) for water discharged from the Silt Pond(s) or Dredge Pond(s) are provided and maintained in an appropriate condition to permit:	10.03, 10.09,	There is no requirement to physically mark the sample/discharge points in the ponds. They are marked on site maps, notably the map in the approved 2026 SWMP. However, no signage or physical marker was observed on	Compliant	Observation 1.	Consider physical markers/signage identifying the two surface	Site to provide adequate markings/signages for the surface water locations.

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail	Proponent's Response
	a) the clear identification of each Dredge Pond and Sediment Dam and discharge point(s); b) the collection of representative samples of the water discharged from the Silt Pond(s) and Dredge Pond(s); and, c) access to the sampling points(s) at all times by an authorised officer of the EPA.	1.01, 1.03	Site. A physical marker would be a helpful addition for SIte management. The locations are readily accessible and identifiable and can be accessed easily by any EPA officer.			water sampling/discharge locations.	4/11/2027
EPL 13077 M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	9.01, 9.02, 9.03, 9.04, 9.05, 9.06	No complaints were made during the audit period and hence, the requirement to capture these details has not been triggered. However, the register/complaints form do not appear to have the requisite fields to meet the EPL requirements in the event that a complaint was received.	Compliant	Observation 2.	Revise the Complaint Register and/or the complaint record form to include <u>all</u> fields and details required by the EPA licence.	Review the complaint register and update to include fields and details required by the EPA licence. 31/03/2027
eviw	If the licensee undertakes monitoring as a result of a licence condition, the licensee must supply to the EPA a summary of the results of the pollution monitoring data in respect of each reporting period. The summary must be provided as a Microsoft Excel file, formatted with the following column headings: a.EPA point identification number; b.pollutant; c.unit of measure; d.number of samples required; e.number of samples collected and analysed; f.lowest sample value; g.mean of sample values; and h.highest sample value. The pollution monitoring data summary for the reporting period must be supplied to the EPA via the EPA's online digital portal by the "due date", as defined in the dictionary at the end of this licence.	1.03, 14.04	The 'Due date' as defined in the EPL is 60 days after the end of each 'Reporting period', which is defined as the annual anniversary date after the licence issue date. This means that the monitoring summary must be submitted in accordance with condition R1.5 within 60 days of the anniversary date each year (10 June). The first monitoring summary under this new condition was therefore due by 10 August 2026, which is outside of the audit period.	Not triggered	Observation 1.	Review reporting system reminders and processes to ensure that triggers are set to send the annual monitoring summary to the NSW EPA by no later than 10 August each year.	The first summary was submitted by the due date 10/08/2026. The Holcim NSW plan to be updated to include 10 August each year as a reminder. 31/01/2027