



Holcim (Australia) Pty Ltd

Jandra Quarry  
Possum Brush, NSW

Independent Environmental Audit

September 2025





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## 1. Executive Summary

4Pillars Environmental Consulting (**4Pillars**) was engaged by Holcim (Australia) Pty Ltd (**Holcim, the Client**) to undertake an Independent Environmental Audit (**IEA**) at Jandra Quarry (**the Site**). Jandra is a hard rock quarry, located on the Pacific Highway at Possum Brush approximately 17 kilometres south of Taree. The Site falls within the Mid-Coast Council Local Government Area (**LGA**).

This IEA Report has been prepared as required by the Project Approval DA 213-10-99 (MOD 5) (**PA or the Consent**) (see Appendix 2) Condition 5.8. This is the fourth IEA to be undertaken for the project since Modification 5 was approved in 2015. Condition 5.8 of the Consent as modified requires that an IEA be undertaken *“By 31 March 2016, and every three years thereafter, unless the Secretary directs otherwise”*.

The Audit Team was approved by DPHI on 10 June 2025 (NSW Planning ref: DA231-10-99-PA-21 (see Appendix 1). This IEA was conducted in accordance with DA 213-10-99 (MOD 5) Condition 5.8 and the NSW Independent Audit Post Approval Requirements, May 2020 (**IAPAR 2020**). The site inspection was conducted on Monday 7 July 2025 and the Site inspection included a site tour and management interview.

### *Audit Findings Summary*

In total, 155 conditions of the Consent and EPL were assessed as part of this IEA. Of the 155 conditions, 108 were found to be compliant, 10 were non-compliant, and 37 were not triggered. Based on this audit, the Site has a 94% compliance rating.

### *Key strengths*

- Operations-related documentation and records management were maintained to a good standard.
- The Site was operating within the approved boundaries and required export/production limits per year.
- No environmental incidents or complaints were recorded during the audit period.
- Environmental mitigation measures were effectively implemented, including water sprays, water cart, etc.
- Water management and quality of runoff was of an acceptable standard.
- Real time continuous air quality (dust) monitoring was conducted, which allows the Site to identify issues quickly and be responsive in the mitigation of airborne particulate matter.
- Standards of chemical and liquid storage was of a good standard.
- Personnel had a sound working knowledge of environmental obligations and procedures.

### *Recommendations and observations*

Eight (8) recommendations have been raised to address non-compliances and five (5) observations and opportunities for improvement have also been identified.

### *Conclusion*

The Holcim Jandra Quarry 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 fourth conducted under DA 231-10-99 MODs 5. It was required within three years of the previous audit. The Consent states that subsequent IEAs are to be conducted every three years following this IEA. To ensure compliance with this requirement, **the next IEA should be scheduled to occur prior to 7 July 2028.**



## 2. Introduction

4Pillars Environmental Consulting (**4Pillars**) was engaged by Holcim (Australia) Pty Ltd (**Holcim, the Client**) to undertake an Independent Environmental Audit (**IEA**) at Jandra Quarry (**the Site**). Jandra is a hard rock quarry, located on the Pacific Highway at Possum Brush approximately 17 kilometres south of Taree. The Site falls within the Mid-Coast Council Local Government Area (**LGA**).

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The Audit Team was approved by DPHI on 10 June 2025 (NSW Planning ref: DA231-10-99-PA-21 (see Appendix 1). This IEA was conducted in accordance with DA 213-10-99 (MOD 5) Condition 5.8 and the NSW Independent Audit Post Approval Requirements, May 2020 (**IAPAR 2020**). The site inspection was conducted on Monday 7 July 2025 and the Site inspection included a site tour and management interview.

### 2.1 Project Background

Jandra Quarry supplies construction materials used to make concrete, roads, bridges, and asphalt across the Mid North Coast. The closest village to the site is Nabad, located approximately 10 kilometres to the southwest of the Site.

The land immediately surrounding Jandra Quarry is well vegetated. The site is bound by privately owned land to the south, north and east (refer to Figure 4). Residences are located to the northeast (approximately 350 metres), east (approximately 850 metres), southeast (approximately 1.45 kilometres) and southwest (approximately 800 metres) of the operational areas of the site. The surrounding land is characterised by cleared agricultural land on the lower slopes and moderate to heavily vegetated land on the steeper areas. The lower slopes to the south and east of the site have been extensively cleared and are predominately used for cattle grazing. The topography of the site and surrounding area is generally undulating with rolling hills and valleys. The existing quarry is cut into the northern face of the hillside and extends from the ridgeline in an easterly direction (refer to Figures 2 and 5). The upper section of the existing working face is visible from the north, however, the remainder of the quarry facilities are not visible from surrounding areas.

The site is located within the headwaters of Talawahl Creek. Talawahl Creek joins with Bungwahl Creek, which subsequently joins the Wallamba River, approximately 5.5 kilometres to the south of the site (refer to Figures 1 and 4). The area is underlain by an undifferentiated sequence of Devonian sediments that are approximately 345 to 395 million years old. The sequence consists of interbedded mudstone, sandstone, conglomerate, tuff and chert with local greywacke beds. A major greywacke bed is present within the site and is the target of the quarry operations.

The previous development consent for Jandra Quarry was granted on 30 March 2000 (DA 231-10-99). Jandra Quarry sought a modification to this Development Consent under Section 75W of the *Environmental Planning and Assessment Act 1979 (EP&A Act)* to provide for an increase in production and transportation of quarry products, in order to meet current and forecast market demands. The Jandra Quarry Intensification in Production Development Consent was granted on 13 March 2015 by the NSW Minister for Planning (DA 231-10-99 MOD 5).

All land located within the development consent boundary is owned by Holcim. Holcim also owns Lot 10, DP790056, which is located immediately south of the development consent boundary. The remaining surrounding land is primarily privately owned, with a State Forest located to the northwest of the quarry on the opposite side of the Pacific Highway.

### 2.2 Environmental Approvals

#### 2.2.1 Development Consent(s)

The audit team understands there is one development consent active at the Subject Site.

State significant development consent DA 213-10-99 (MOD 5) (**the Consent or the PA**) was approved on 13 March 2015. The common name of the project is the ‘*the Jandra Quarry*’.

The Consent permits the following key activities:

- Operation of the Site as a hard rock quarry until 2045;
- Extraction of up to 490,000 tonnes of quarry products per annum;
- Transport of up to 475,000 tonnes of quarry products per annum;



- Storage of various aggregates and quarry materials awaiting export;
- Operation of a mobile asphalt plant on a campaign basis 24 hours a day (note this plant was decommissioned in late 2023 and is not carried on at the time this audit was conducted);
- Operation of a crushing and screening plant;
- Blasting activities to access rock resources and facilitate extraction;
- Overburden storage, truck parking and facilities, Site offices, truck washdown and refuelling areas, weighbridges and workshop.

The approved site layout is shown in Figure 1.

### 2.2.1 Current modifications

No current modifications to the Consent are shown in the Major Projects portal at the time of writing this report.

The approved Air Quality Management Plan references an intended modification to be submitted in late 2021/early 2022, which was to harmonise 'inconsistencies' between the Consent and EPL. However, the Proponent determined that the existing Conditions of Consent gave adequate scope to comply with the EPL. This audit team agrees with this conclusion.

### 2.2.2 Environment Protection Licence

The Site conducts several 'Scheduled Activities' under the *Protection of the Environment Operations Act 1997* and holds EPA Licence no. 2796.

### 2.2.3 Other documents – assessments, strategies, plans or programs

The following documents 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 and Blast Management Plan Rev D dated 20/8/2018	SSD Consent (Cond. 3.4 and 3.9)
Aboriginal Cultural Heritage Management Plan Rev C Final Draft dated 31/8/2015	SSD Consent (Cond 3.29)
Air Quality Management Plan Version 2 dated 11/2021	SSD Consent (Cond 3.14)
Biodiversity and Rehabilitation Management Plan Final V5 dated 20/8/2018	SSD Consent (Cond 3.25)
Environmental Management Strategy UNDATED	SSD Consent (Cond 5.1)
Soil and Water Management Plan UNDATED	SSD Consent (Cond 3.19)
Pollution Incident Response Management Plan Revision 11 dated 11/2024	POEO Act (s153A)

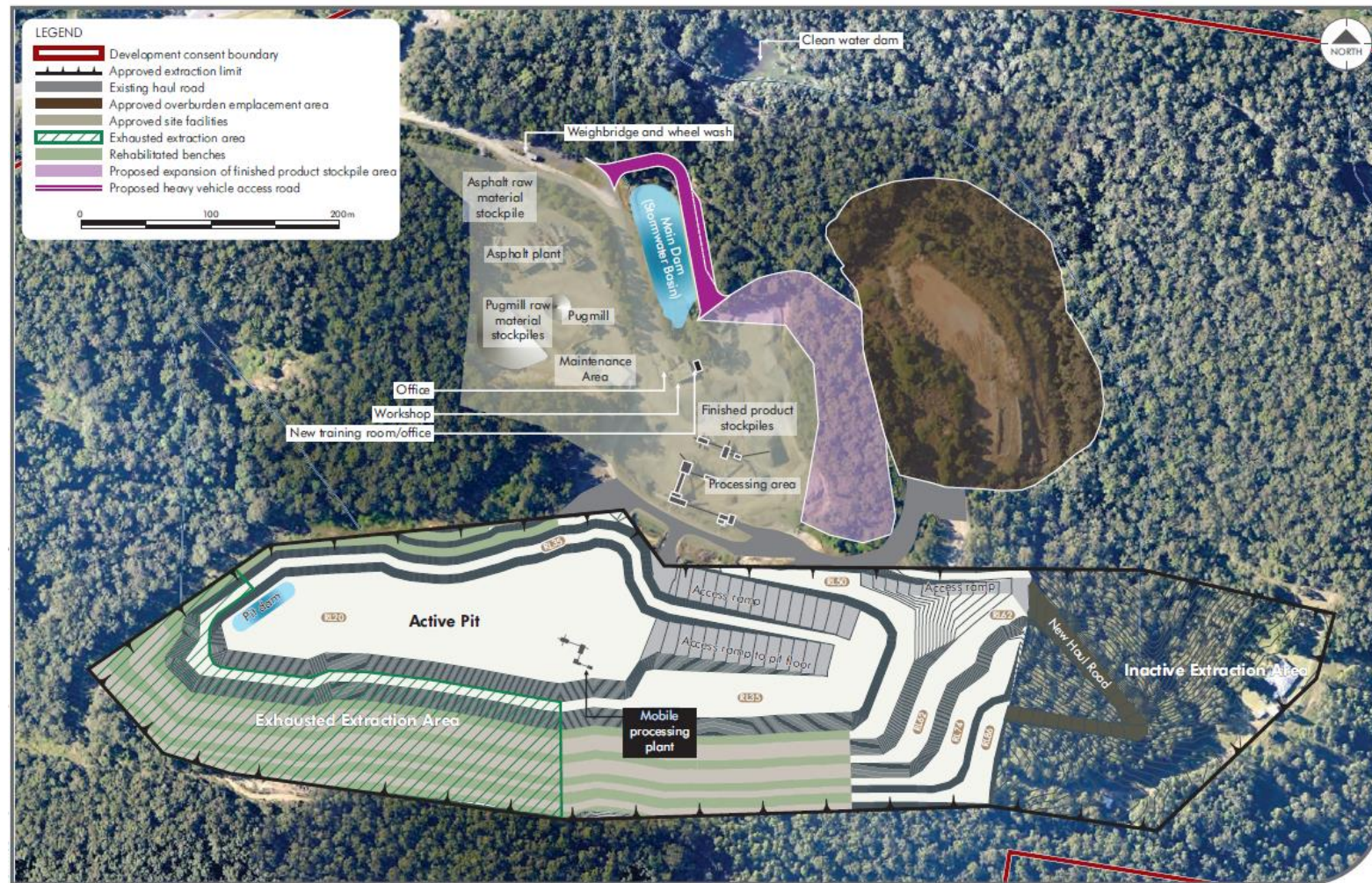
## 2.3 Audit Team

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	<ul style="list-style-type: none"> <li>• Bachelor of Science – Chemical Engineering</li> <li>• Exemplar Global Certified Master Environmental Auditor and Quality Auditor (#119536)</li> </ul>
James Hammond	4Pillars Environmental Consulting Pty Ltd	Technical Specialist	<ul style="list-style-type: none"> <li>• Bachelor of Science</li> <li>• Master of Wildlife Habitat Management</li> <li>• EIANZ Certified Environmental Practitioner (#794)</li> </ul>
Rhys Thompson	4Pillars Environmental Consulting Pty Ltd	Audit Support	<ul style="list-style-type: none"> <li>• Bachelor of Environmental Systems</li> <li>• Master of Environmental Science</li> <li>• Master of Agriculture</li> <li>• EIANZ Certified Environmental Practitioner (#1718)</li> </ul>





#### PROPOSED STAGE 2 EXTRACTION

Environmental Assessment  
Jandra Quarry  
Possum Brush, New South Wales 2430

FIGURE 7

Figure 1: Approved development layout from the Consent (Stage 2 extraction, representing site conditions during this audit period, noting that Stage 2 is progressing and current Site conditions do not yet match the final landform of Stage 2. Map credit: Element Environment.





Figure 2: Oblique aerial image of the Jandra Quarry. Source: Nearmap 2024.



## 2.4 Audit Objectives

The primary objective of this IEA is to fulfil the requirements outlined in Condition 5.8A of the PA, which details that the Applicant must commission and pay the full cost of an IEA by 31 March 2016, and every three years thereafter, unless the Secretary directs otherwise. The Audit must be conducted in accordance with Condition 5.8 of the PA and ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing.

Although not explicitly stated in the PA, DPHI confirmed that the IEA is to be conducted with due regard to IAPAR 2020.

## 2.5 Audit Scope

The scope of this IEA was as per the PA and IAPAR 2020, 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 PA and any assessment, strategy, plan or program required under the abovementioned approval;
- A review of the adequacy of any approved strategy, plan or program required by the PA and the other abovementioned approval(s).
- A recommendation of appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required by the PA 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 development's past performance and comparison to industry best practices.

## 2.6 Audit Period

This IEA covers the period between **13 July 2022 – 7 July 2025**, which is the period from the last IEA to the date of the audit inspection for this audit.

## 2.7 Project activities

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

- Blasting and excavation of resources;
- Crushing, grinding and screening;
- Operation of the mobile asphalt plant, prior to its decommissioning in 2023;
- Transport of quarry materials;
- Storage of overburden and progressive rehabilitation.

Since the last audit, the finished product stockpile area has been expanded, the quarry pit has continued to extend to the east, the overburden emplacement area has been expanded and storage has increased and the asphalt plant has been removed.

# 3. Audit Methodology

## 3.1 Selection and Endorsement of Audit Team

In accordance with Section 3.1 of IAPAR 2020, Independent Audits must only be undertaken by a suitably qualified, experienced and independent auditor. The PA states the appointment of the auditor, technical experts, and supporting personnel (i.e. all members of the audit team) must be agreed in writing by the Planning Secretary before each audit is commissioned.

The Audit Team was approved by DPHI on 10 June 2025 (NSW Planning ref: DA231-10-99-PA-21 (see Appendix 1).



### 3.2 Audit Scope Development

The audit scope and table were developed by 4Pillars based on the conditions of the PA and other approval documents, as well as the feedback obtained during consultation, which is further discussed in Section 3.5. 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 7 July 2025 at 11:00 am and 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 regulator inspections, 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 2020, 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 including DPHI, NSW EPA, and Mid-Coast Council. Specific details regarding consultation are provided in Section 3.5.
- A detailed review of the PA, including the development of the audit table.
- Issuing Holcim with a document request for evidence required to assess compliance with the conditions of the PA.
- 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 interviews 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 via videoconference on 5 September 2025, attended by the same personnel as the opening meeting. Audit findings were presented, recommendations were discussed, and post-audit actions were confirmed.

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

#### 3.3.4 Audit Attendance and Site personnel interviewed

The Site 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
David Saville	Holcim	Quarry Manager – Jandra
Peter Wilson	Holcim	Site Supervisor
Peter Lovell	Holcim	Site Foreman
Dozie Egeonu (via video link)	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. Activities observed included:

- Operation of excavators and loading of quarry trucks.
- Weighbridge operation and outgoing trucks being weighed and exiting the Site.
- Road haulage operation and activity of trucks on local roads.
- Operation of the crushing and screening plant and the Front End Loader moving stockpiled material.
- Operation of Site pumps and other small, fixed plant. Activities in the workshop (welding, etc.).

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

### 3.5 Consultation

On 24 June 2025, consultation via email was undertaken with DPHI, NSW EPA, and Mid-Coast 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. Council responded prior to the audit and NSW EPA issued a nil response after the date of the audit.

DPHI was further asked to provide any additional parties or agencies for which consultation was suggested, as per Section 3.2 of IAPAR 2020. No response was received from DPHI.

A summary of the outcomes of consultation with the above agencies is presented in Section 5.7, with full records (i.e. email correspondence) included in Appendix 6.

### 3.6 Compliance Status Descriptors

The compliance status of each requirement in the audit table was assessed in accordance with Section 3.8 of IAPAR 2020, 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
<b>Compliant</b>	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
<b>Non-compliant</b>	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
<b>Not triggered</b>	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 pieces of documentary evidence 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.

## 4. Previous Audit findings

A summary of the conditions where a non-compliance was recorded during the Jandra Quarry 2022 IEA is provided in Table 12. An update has been provided for each item, including whether the condition was compliant in the 2025 audit, or not.

## 5. 2025 Audit Findings

### 5.1 Summary of compliance

The level of compliance with requirements assessed in this independent environmental audit is of a goods standard, with 94% of requirements 'compliant' or 'not triggered'.



Table 5: Summary of compliance.

Compliance status	Count	%
Compliant	108	70%
Non-compliant	10	6%
Not triggered	37	24%
<b>TOTAL</b>	<b>155</b>	<b>100%</b>

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:

- **DA 231-10-99 MOD 5:**
  - Schedule 1 – Preamble – Not Applicable.
  - Schedule 2 – Administrative Conditions.
  - Schedule 3 – Environmental Performance Conditions.
  - Schedule 4 – Additional Procedures.
  - Schedule 5 – Environmental Management Conditions.

Table 6: Breakdown of compliance status with DA 231-10-99 MOD 5.

SSD Project Approval	Compliant	Non-compliant	Not triggered	TOTAL
Administrative conditions	12	0	6	18
Environmental Performance Conditions	31	3	5	39
Additional Procedures	0	0	5	5
Environmental Management Conditions	6	3	1	10
<b>TOTAL</b>	<b>49</b>	<b>6</b>	<b>17</b>	<b>72</b>
<b>Proportion</b>	<b>68%</b>	<b>8%</b>	<b>24%</b>	<b>NA</b>

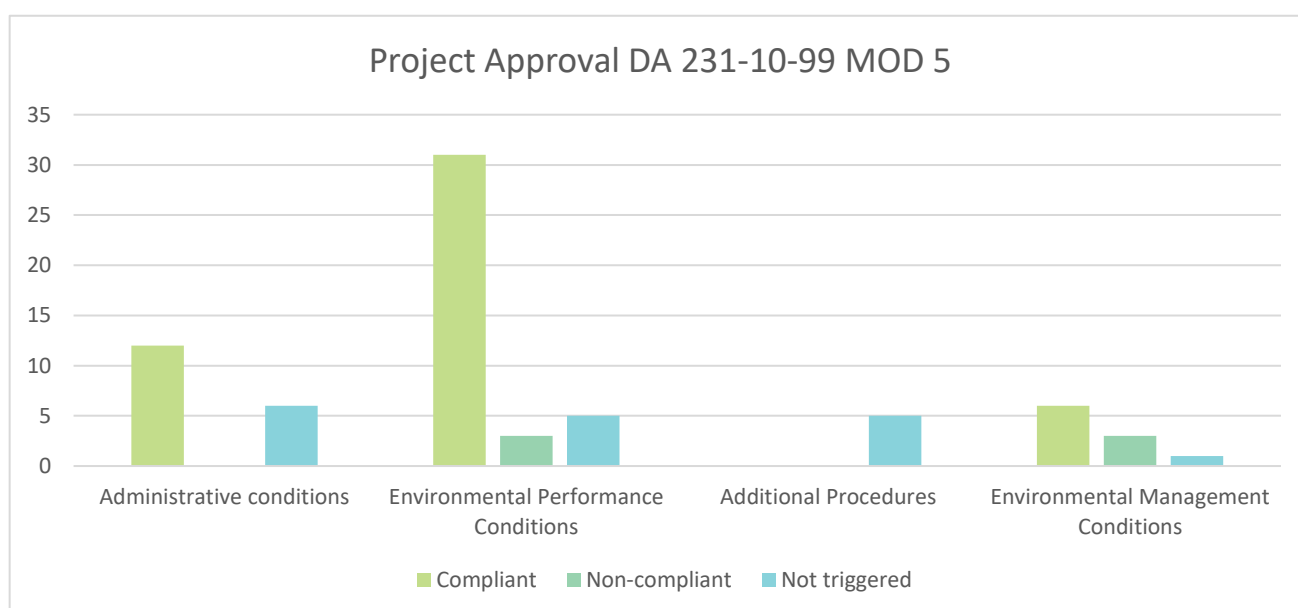


Figure 3: Summary of compliance – conditions of Consent.



Table 7: Breakdown of compliance status with EPL 2796.

EPL Requirements	Compliant	Non-compliant	Not triggered	TOTAL
Administrative Conditions	4	0	0	4
Discharges to Air and Water and Applications to Land	3	0	1	4
General Conditions	2	0	2	4
Limit Conditions	21	1	6	28
Monitoring and Recording Conditions	17	1	2	20
Operating Conditions	6	0	0	6
Other reporting conditions	1	2	0	3
Reporting Conditions	5	0	9	14
<b>TOTAL</b>	<b>59</b>	<b>4</b>	<b>20</b>	<b>83</b>
<b>Proportion</b>	<b>71%</b>	<b>5%</b>	<b>24%</b>	<b>NA</b>

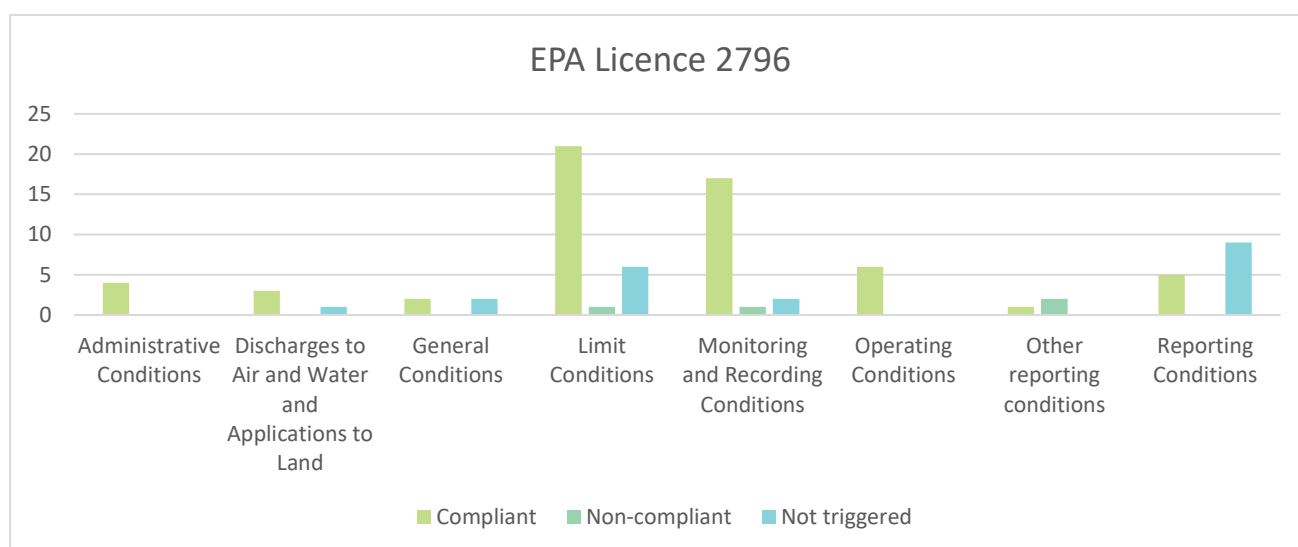


Figure 4: Summary of compliance – EPA Licence.

## 5.2 Summary of non-compliances during the Audit Period

There were ten (10) 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 issued during the Audit Period.

There was one (1) Official Caution issued by DPHI, on 13 March 2025, relating to failure to notify the Planning Secretary of an exceedance of the annual blast overpressure criterion, and to provide a detailed report.

## 5.4 Complaints

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

No complaints were recorded on the register during the Audit Period.



## 5.5 Incidents

There were zero (0) 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 7.

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 Condition 5.5 of the PA, all management plans and programs are to be reviewed within three months of:

- a) the submission of an incident report under condition 5.6;
- b) the submission of an Annual Review under condition 5.4;
- c) the submission of an Independent Environmental Audit under condition 5.8; or
- d) the approval of any modification of the conditions of this consent.

During the audit period, an IEA report was submitted and three Annual Reviews were submitted (four triggers). No other triggers were identified. Management plans were reviewed following these triggers and the audit team has sighted this correspondence.

However, despite reviews being conducted by the Proponent as required, the audit team questions the decision that no change(s) were warranted for the Management Plans. The Audit team has made an observation that the Proponent should consider revision of the SWMP, ACHMP and NMP at a minimum, or otherwise supplement them (for example, with an addendum) to ensure they reflect current Site conditions, current statutory requirements and current best practice and state of knowledge.

The environmental performance of the Site is of a good standard and the implementation of the current management plans is supporting this outcome. Monitoring data, the standard of environmental controls (as demonstrated through site observations) and the lack of community complaints and regulatory action is also a testament to this.

## 5.7 Consultation with the Department and stakeholders

Table 8, below, presents the results of the consultation process and the feedback received from the contacted stakeholders, including those requested by DPHI. Initial consultation emails were issued on 24 June 2025. A copy of the stakeholder feedback is provided in Appendix 6. The aspects requested to be assessed by the stakeholders were taken into consideration during the completion of the audit. Where they were additional to items covered in other requirements (i.e. the Consent) they have been added to the audit table in Appendix 5.

*Table 8: Summary of consultation undertaken.*

Stakeholder	Main aspects raised	Response to comments
DPHI	No response was received from DPHI before the completion of the IEA.	NA
Mid Coast Council	a. Water quality- <i>A review to ensure that there is appropriate monitoring of water quality for water leaving the site. This would be applicable for all stages of the works, construction phase, operational phase and rehabilitation phase. Implementation and monitoring of erosion and sediment control measures to assist in water quality matters should be investigated. It is also advisable to ensure that the site is not polluting the environment and there are adequate controls and monitoring in place.</i>	a. Section 7.3 of the 2022–2024 Annual Reviews outlines surface water discharge activity from the site. No discharges occurred in 2022 or 2023. In 2024, two discharge events were recorded in September and October, both compliant with the concentration limits specified under Condition L2.4 of the Environment Protection Licence (EPL). Year-to-date records for 2025 indicate discharge occurred on 11 days, with all monitored parameters meeting regulatory requirements. Monitoring results confirm that discharge quality remains within acceptable limits and aligns with obligations under Section 120



Stakeholder	Main aspects raised	Response to comments
	b. <i>Ecology - Council requires an update on the implementation of the attached Biodiversity &amp; Rehabilitation Management Plan particularly details on the agreed location and long-term land conservation mechanism for the required Biodiversity Offset Area, which was not finalised at the time the Plan was approved.</i>	<p>of the Protection of the Environment Operations (POEO) Act.</p> <p>b. Ongoing rehabilitation activities were observed across the site. Works have been completed on pit bench areas, the upper boundary zone, and the lower sections of the spoil stockpile area. Weed management is actively being carried out, noting there are some parts of the Site where weeds are established but difficult to control due to access and safety concerns.</p> <p>Per the 2022 IEA- As reported in the 2016 and 2019 IEAs, correspondence between Holcim and DPIE confirming DPIE's acceptance of a section 88b Covenant being implemented has been previously sighted. As specified in Section 8.1 of the 2021 Annual Review, instruments for protection of the Offset Area were secured in 2020.</p>
NSW EPA	<p>No response prior to audit inspection.</p> <p>Response received on 25 July 2025 – “EPA has no comment to provide for this request”.</p>	No matters were raised by NSW EPA.

## 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 2015 environmental assessment (modification report) for the project covered only those issues relevant to the modification scope. Therefore, the assessment of predicted impacts has been based on a review of available environmental impact assessment documents and the scope of controls included in EA.

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

Aspect	Summary of key potential impacts	Summary of actual impacts during the audit period	Consistent (yes/no?)
Noise and Blasting	The noise and blasting impact assessment evaluated potential effects of the proposed modification on nearby residences. With operational restrictions in place, early morning noise levels are expected to remain below project criteria. However, daytime noise may exceed limits by up to 5 dBA at three locations, though not anticipated to cause nuisance. Asphalt production could exceed criteria by up to 7 dBA at one residence, requiring either a negotiated agreement or a noise barrier. Road traffic noise increases are below threshold levels. Blasting impacts will be controlled through charge limits and monitored to ensure compliance with regulatory conditions.	Noise monitoring confirmed compliance with all relevant criteria, supported by the absence of complaints and the observations of the audit team on site. A negotiated agreement exists with receiver R1 and several of the nearest properties are owned by the Proponent. Blasting was generally compliant, though two exceedances occurred in 2023—one for overpressure and one for vibration—both investigated and attributed to technical issues. No exceedances were recorded in 2024 or 2025. Overall, noise and blasting impacts were minimal and consistent with predicted levels, with corrective actions and monitoring systems in place to manage risks effectively.	YES
Air quality	The assessment found that with current and additional controls, air quality impacts from the proposed modification would meet all relevant criteria at nearby residences. Odour modelling indicated that the mobile asphalt plant is	Air quality performance was assessed as compliant with all relevant criteria. Dust suppression measures—including water carts, chemical sprays, and physical barriers—are effectively implemented, and no off-site dust	YES



Aspect	Summary of key potential impacts	Summary of actual impacts during the audit period	Consistent (yes/no?)
	unlikely to cause nuisance at surrounding sensitive locations.	emissions or complaints were recorded. Routine monitoring of PM10 and depositional dust confirmed compliance with standards. Odour impacts were minimal, with no complaints and no offensive emissions observed. A brief monitoring gap occurred in 2024 due to equipment failure, but noting the performance trend of the Site, it is unlikely that exceedances occurred in that period. Overall, the quarry's air quality impacts remained low and consistent with predicted levels in the environmental assessment.	
<b>Biodiversity</b>	The proposed new access road and stockpile expansion extended beyond the approved disturbance area, requiring the clearing of 1.284 hectares of native vegetation. The increased production was expected to expose local fauna to prolonged noise, light, and road-kill risk. While no significant impacts on threatened flora or fauna were predicted, the potential presence of the Eastern Underground Orchid warranted further investigation. If found, impacts could be significant. Koalas were not detected, and core habitat was not confirmed. Hollow-bearing trees would be removed and offset with nesting boxes. Overall, no significant biodiversity impacts were anticipated with mitigation measures in place.	Biodiversity and rehabilitation performance aligns with predicted impacts. The site is undergoing progressive rehabilitation, with pit benches, spoil stockpiles, and perimeter areas stabilised and revegetated. Weed control is actively managed, though some difficult to access areas do have weeds present. Hollow-bearing trees have been removed, with mitigation through nest box installation. There have been no identified road kill incidents or other direct harm of threatened fauna.	YES
<b>Water Resources</b>	The surface water management assessment confirmed that existing infrastructure met current needs, with potential shortfalls during extreme dry conditions. Up to 5 ML annually could be sourced from the clean water dam under existing licence provisions. Additional pit dam storage was identified as a feasible option to improve water availability. No further approvals were required under the Water Act or Water Management Act. With the implemented water management measures, no significant downstream environmental impacts were predicted. The quarry is not subject to groundwater flow.	Water resource management at Jandra Quarry aligns with predicted impacts. Majority of the Site drains to the pit, which is contained and does not passively discharge to the off-site environment. The site maintains sufficient water storage to meet operational needs under normal conditions. Surface water discharge monitoring confirms compliance with licence limits. No significant downstream impacts have been identified through monitoring and inspections. If needed the Site has the option of increasing pit dam storage, to enhance water availability during dry conditions.	YES
<b>Traffic</b>	While the proposed modification will increase the overall daily volume of vehicle movements, peak hourly traffic volumes were expected to remain unchanged. The traffic impact assessment determined that the existing intersection at Pacific Highway and Jandra Quarry Access Road had adequate capacity, is appropriately designed, and did not require upgrades to safely accommodate the proposed changes.	Traffic-related environmental performance remains compliant with expected impacts. The intersection of the Pacific Highway and Jandra Quarry Access Road is maintained in good condition, with no identified impacts or upgrade requirements. RMS re-sealed the intersection approximately 18 months ago, and the audit team observes it to be in satisfactory condition. No concerns or complaints were raised regarding traffic safety or infrastructure during the audit period, suggesting that the quarry's transport activities are not causing adverse environmental or community impacts.	YES
<b>Greenhouse</b>	A greenhouse gas (GHG) emissions assessment was conducted to quantify the expected increase in emissions from the proposed modification and identify mitigation options. While annual GHG emissions were projected to rise due to intensified production, total	Greenhouse gas emissions performance aligns with predicted impacts. GHG mitigation measures are being identified by the Proponent and implemented to reduce annual emissions.	YES



Aspect	Summary of key potential impacts	Summary of actual impacts during the audit period	Consistent (yes/no?)
	emissions over the quarry's life were not expected to increase, as the resource would be extracted over a shorter timeframe. The assessment recommended feasible management actions to reduce operational GHG emissions		
Heritage	The proposed new access road and stockpile expansion were located outside the approved disturbance area. An Aboriginal heritage due diligence assessment confirmed no Aboriginal or historic heritage sites were present in the new disturbance zone, and no heritage impacts were expected. Existing heritage sites within the consent boundary continued to be managed under the Aboriginal Heritage Impact Permit and the Jandra Quarry Environmental Management Plan.	Existing Aboriginal heritage sites within the development consent boundary continue to be managed in accordance with the Aboriginal Heritage Impact Permit and the Jandra Quarry Environmental Management Plan. No non-compliances or adverse heritage-related issues are identified during the audit period.	YES

### 5.10 Site Inspection Commentary

Commentary and observations from the Site Inspection conducted on 7 July 2025 are provided in Appendix 5 as they relate to specific requirements. Relevant photographs taken during the inspection are provided in Appendix 7.

### 5.11 Key Strengths and Environmental Performance

- Operations-related documentation and records management were maintained to a good standard.
- The Site was operating within the approved boundaries and required export/production limits per year.
- No environmental incidents or complaints were recorded during the audit period.
- Environmental mitigation measures were effectively implemented, including water sprays, water cart, etc.
- Water management and quality of runoff was of an acceptable standard.
- Real time continuous air quality (dust) monitoring was conducted, which allows the Site to identify issues quickly and be responsive in the mitigation of airborne particulate matter.
- Standards of chemical and liquid storage was of a good standard.
- Personnel had a sound working knowledge of environmental obligations and procedures.

## 6. Observations and Recommendations

In total, 155 conditions of the Consent and EPL were assessed as part of this IEA. Of the 155 conditions, 108 were found to be compliant, 10 were non-compliant, and 37 were not triggered. Based on this audit, the Site has a 94% compliance rating.

This IEA is the fourth conducted under DA 231-10-99 MODs 5. It was required within three years of the previous audit. The Consent states that subsequent IEAs are to be conducted every three years following this IEA. To ensure compliance with this requirement, **the next IEA should be scheduled to occur prior to 7 July 2028.**

### 6.1 Conclusion

The Holcim Jandra Quarry 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.

Continued attention to detail in implementing the Consent 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.



## 6.2 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 collected (refer to Appendix 7)	Comments/Findings	Compliance status	Observation	Observation detail
DA 231-10-99 MOD 5s						
Schedule 2 Condition 9	The Applicant shall not transport more than 475,000 tonnes of quarry products from the site in any calendar year.	3.01, 3.02, 3.03, 3.07	Based on TRANSPORT Truck movement summaries reviewed for data during the audit period. Total volume of material transported in each calendar year as follows: 2022 - 440,987 t. (Annual Review says 415,433 t). <b>440,987 Confirmed.</b> 2023 - 412,909 t. 2024 - 380,550 t. Confirm 2025 YTD: Approx 180,199	Compliant	Observation 1.	Lodge a correction or addendum to the 2022 AEMR to correct the transported material figure.
Schedule 3 Condition 19	The Applicant shall prepare and implement a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with the Council and NOW, by suitably qualified and experience person/s whose appointment has been approved by the Secretary, and be submitted to the Secretary for approval by 31 August 2015. In addition to the standard requirements for management plans (see condition 3 of Schedule 5) this plan must include a: (a) Site Water Balance that: • includes details of: o sources and security of water supply, including contingency planning to ensure demand will be met under all climatic conditions; o the site water storage capacity and licensing requirements for all stages of the development, o water use and management on site; and (b) Surface Water Management Plan that includes: • a detailed description of the surface water management system for the development, including the: o clean water diversion system; o erosion and sediment controls; and o the water storages required for each stage of the development; • identification of all reasonable and feasible measures to improve the quality of surface water on the site, particularly those measures required to improve the water quality in the main dam, and a timeframe for the implementation of any identified improvements; • the measures that would be implemented to minimise water use on site; • surface water impact assessment criteria, • a program to monitor surface water quality, and • a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the development; and • reporting procedures.	13.02, 13.03, 10.06, 7.06	Audit reference materials made publicly available did not display author or document approval markings; however, such approvals and the Department's approval of this Management Plan were verified during prior Independent Environmental Audits.  Section 6 of the Site Water Management Plan (SWMP) provides a thorough analysis of water supply sources, site consumption patterns, storage infrastructure, operational water use, management procedures, and environmental water loss.  The 2019 and 2022 IEAs found the Management Plan to be non-compliant with the requirement to include a 'plan to respond to any exceedances of the performance criteria and mitigate adverse surface water impacts of the development'.  The Management Plan has not been updated since the 2022 IEA. However, the audit team refers to Table 8 of the plan, which notes flocculant is to be added following any exceedance of the TSS criterion. The audit team does consider this to be a response to exceedance, as required by the Condition, although there is an opportunity to expand this to other pollutants. The Plan does not explicitly discuss how to respond to downstream impacts in the event of a release of water outside of criteria. Further supporting the decision to find this condition compliant, the audit team notes that the Department's approval of this Management Plan could be taken as endorsement that the Proponent has met these requirements in preparing the plan.	Compliant	Observation 2.	The Proponent may choose to implement one of the following options, presented in this audit team's suggested order of likelihood to achieve future compliance with this condition. 1. Revise the Soil and Water Management Plan. 2. Prepare an addendum to the management plan, and submit to the Department for approval 3. Include a sediment-laden water overflow action plan in the PIRMP.s



Condition of consent	Requirement	Evidence collected (refer to Appendix 7)	Comments/Findings	Compliance status	Observation	Observation detail
Schedule 3 Condition 29	The Applicant shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with Aboriginal stakeholders; (b) be submitted to the Secretary for approval by 31 August 2015; (c) describe the measures that would be implemented to: • manage known Aboriginal objects and sites; • monitor all new surface disturbance on site for unidentified Aboriginal objects; • manage the discovery of any human remains or previously unidentified Aboriginal objects on site; and (d) ensure ongoing consultation with Aboriginal stakeholders in the management of any Aboriginal cultural heritage values on site.	8.03, 4.02, 10.02, 13.03	Activities are operated in accordance with the Aboriginal Cultural Heritage Management Plan (ACHMP) (31/08/2018). a) An attempt to consult with LALCs was made in 2015 but no responses were received. No ongoing consultation has been carried out and none has been required as the defined triggers in the management plan have not occurred. b) The Plan is dated 31 August 2015 and we understand was submitted by this date, but it is outside of this audit period. c) Current extraction area far from sites. they are physically marked. d) The ongoing consultation triggers in the plan have not occurred.  2022 IEA: Non-compliant - "A review of the ACHMP shows that recommendations from the 2016 and 2019 IEAs have not been adopted, as no updates to the consultation section of the ACHMP have been made and no evidence available to indicate that Holcim have tried to close out this lack of consultation in the ACHMP. Forster LALC and Purfleet-Taree LALC have both been attempted to be contacted as per the ACHMP Rev B. Additionally, no approval of the ACHMP is evident within the document, however the requirement for Department approval is noted in Section 1.4"  This audit team has a different view on this condition to the previous two audit teams. The audit team has not been provided evidence of Departmental approval of the plan; however, other lines of evidence (i.e. AEMRs and annual review correspondence for management plans) indicate the Department has received and approved the ACHMP. Noting that, this audit team believes the requirement to prepare the ACHMP in consultation with aboriginal stakeholders has been met via the attempt to consult and the Department's endorsement of the level of consultation that is evidenced in its acceptance of the plan. In terms of strict compliance with the requirements of this Condition, this audit team believes the Proponent is compliant. However, there is opportunity for improvement in this aspect and an observation has been raised for action.	Compliant	Observation 3.	1. The Proponent shall contact Forster LALC and Purfleet-Taree LALC (or alternative LALCs as appropriate and reflecting current management structures) and provide the approved ACHMP, the most recent AEMR and this 2025 audit report. The Proponent is to invite comment from the aboriginal stakeholders on these documents. Any comments received are to be considered in future management of the Site and any revision of the approved ACHMP.
Schedule 3 Condition 29	As above.	As above.	As above.	As above	Observation 4.	The cultural heritage sites identified on the Site should be added as a layer in Propeller so they are visible to users when using the system for planning and review of activities.
Schedule 5 Condition 5	Within 3 months of the submission of an: (a) annual review under condition 4 above; (b) incident report under condition 6 below; (c) audit report under condition 8 below; and (d) any modifications to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary. <b>Note:</b> This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any	4.01, 4.02	Correspondence has been obtained to demonstrate the Proponent reviewed the management plans following the 2022 IEA, and 2022 and 2023 annual reviews. The submission timeframe for these letters complies with the 3 month period specified in this condition. We note the recommendations of previous IEAs regarding management plans. This audit team does not necessarily agree with the Proponent's conclusion in their reviews that the management plans do not require revision; however, strict compliance with this condition relates to the administrative process of reviewing the plans. This audit team believes that	Compliant	Observation 5.	The Proponent should consider revision of the SWMP, ACHMP and NMP at a minimum, or otherwise supplement them (for example, with an addendum) to ensure they reflect current Site conditions, current statutory requirements and current best practice and state of knowledge.



Condition of consent	Requirement	Evidence collected (refer to Appendix 7)	Comments/Findings	Compliance status	Observation	Observation detail
	recommended measures to improve the environmental performance of the development.		several of the plans, such as the SWMP, ACHMP, and noise management plan should be revised to reflect changes in legislation, recommendations from previous IEAs and changed conditions (i.e. pit expansion, layout changes and removal of the asphalt plant). However, it is the professional opinion of this audit team that the management plans are broadly fit for purpose and their ongoing use does not create any major inconsistencies or risk of environmental harm. The audit team does not have sufficient evidence to take a contrary position to the Proponent and find that their conclusions regarding adequacy of plans is incorrect.			

### 6.3 Recommendations

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

Table 11: Non-compliances raised during this audit.

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail
DA 231-10-99 MOD 5						
Schedule 3 Condition 5	The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 4. However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 4, and the Applicant has advised the Department in writing of the terms of this agreement.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal.  Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation sequence and/or offset delay being too small. Exceedance on 28 April 2023 of 6.1 mm/sec at R2 (reported to EPA and DPHI). On 10 May 2023 Holcim provided an additional Blast Exceedance Result Report to the Department as per Schedule 5 Condition 6 of the development consent. The finding of this report determined that the use of soil spikes likely lead to unreliable results. This result was then excluded from maximum values going forward.  No exceedances from 2024 and 2025. DPHI issued an official caution in March 2025 for failure to report the exceedances in 2023.	Non-compliant	Recommendation 1.	Continue monitoring blasts and follow blasting contractor recommendations for location of blast holes and sequence timing. Continue monitoring and if further exceedances occur, consider the need to modify blasting methodology.
Schedule 3 Condition 14	The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval by 31 August 2015; (b) describe the measures that would be implemented to ensure: • compliance with the relevant conditions of this consent; • best practice management is employed; and • the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;	8.01, 8.02, 8.03, 7.09, 10.08	Activities are operated in accordance with the Air Quality Management Plan (AQMP) Version 2 (November 2021). Submission date outside of this audit period and Departmental approval of the AQMP has been sighted dated 1 March 2022. Section 15 of the AQMP notes that Version 1 was updated in October 2016 for the Mod 5 Modification. a) 2016 IEA marks as compliant "Sighted letter of submission to the Secretary of DP&E dated 31 August 2015". DPE approved Version 2 of the AQMP in 1/3/2022. b) Sections 3 and 7 describe the measures to be implemented. c) Section 9 details the procedures for evaluating the results, notifying exceedances, external reporting etc. Section 10 and Table 13 detail the	Non-compliant	Recommendation 2.	The Proponent must implement a procedure whereby any breakdown or failure of the continuous monitoring device is checked on a weekly basis at a minimum. A contingency must be in place so that any equipment breakdown can be rectified, either with a replacement monitoring device or similar action.



Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail
	(c) describe the proposed air quality management system; and (d) include an air quality monitoring program that: • is capable of evaluating the performance of the development; • includes a protocol for determining any exceedances of the relevant conditions of consent; • effectively supports the air quality management system; and • evaluates and reports on the adequacy of the air quality management system.		actions to be taken dependent on monitoring results. d) The air quality monitoring program is detailed in Section 8, with locations shown in Figure 1.  Implementation not fully complied with due to monitoring gap due to equipment failure in data 2024. Self-reported non-compliance. This was reported in late 2024 once the failure and inability to obtain data had crystallised. As the continuous air quality nephelometer is the only monitoring device for PM10 and TSP, for a 2 month period, the Site was not able to effectively evaluate the performance of the development or determine whether exceedances occurred.			
<b>Schedule 3 Condition 28</b>	Within 3 months of each independent Environmental Audit (see condition 8 of Schedule 5), the Applicant shall review, and if necessary revise, the sum of the Rehabilitation and Conservation Bond to the satisfaction of the Secretary. This review must consider the: (a) effects of inflation; (b) likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development) and implementing the biodiversity offset strategy; and (c) performance of the implementation of the rehabilitation of the site and the biodiversity offset strategy to date.	13.03, 5.01	The 2022 IEA was submitted on 27/3/2023. There is a record of a bond update being submitted on 27/7/2023, four months after the latest date that could be considered 'completion' of the 2022 IEA.	Non-compliant	Recommendation 3.	Within 3 months of the next IEA, Proponent may seek an extension of time from the Department to submit the review, due to the amount of time necessary to prepare it.
<b>Schedule 5 Condition 2</b>	The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant shall, at the earliest opportunity: (a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur, (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.	1.01, 1.02, 9.02	The audit team concludes that, on the few occasions where exceedances of site criteria have occurred (or other issues, such as equipment failure) have occurred, the Proponent has taken appropriate steps to rectify the issue and made reasonable efforts to prevent future non-compliance. In terms of compliance with requirement (b) regarding notification of the Department 'at the earliest opportunity', the Department issued an official caution in March 2025 for failure to report the blasting exceedances in 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasting overpressure limit had crystallised, a precautionary notification should have been made to the Department. The exceedances were discussed in the 2023 AEMR submitted in Q2 2024, but the AEMR is not considered an appropriate vehicle for notification of individual exceedances.	Non-compliant	Recommendation 4.	The Proponent is to assess its internal procedures for the identification and notification of exceedances of environmental performance criteria, to ensure they are fit for purpose. Notifications of exceedances should occur, regardless of whether the Proponent disputes the veracity of the exceedance. Any dispute or mitigating circumstances can simply be discussed in the notification.
<b>Schedule 5 Condition 6</b>	The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.	1.02, 8.02, 8.03	There were no incidents within audit period that caused material harm and no notifications of that type were required.  Dust Sentry Pro sensor failed. 6 day dust results - did not cause material harm, but still required notification. The data was not available from 28 June 2024 and 13 Sep 2024. Notification was made to the Department 19 September 2024. Proponent was advised by the consultant that the data was retrievable, but this was not the case. This notification complied with the requirement to notify as soon as practicable.  An official caution was received in March 2025 for failure to notify	Non-compliant	NA	Refer to Recommendation 4.



Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail
			exceedances of overblast pressure in April and June 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasting overpressure limit had crystallised, a precautionary notification should have been made to the Department.			
<b>Schedule 5 Condition 9</b>	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	13.03, 13.04	Department approval of the audit team was received on 27 June 2022, three months since this date is 27 September 2022, which is taken as the due date for submission. Final Report v1.0 is dated 2 March 2023, outside of the due date. Submission date was 27/3/2023 as confirmed in correspondence from the Department dated 3/8/2023. This condition was not complied with for the 2022 audit, the submission deadline for which fell within this audit period. We note that due to the date on the 2022 IEA audit report, the Consultant engaged did not provide the report in a timely manner to allow the Proponent to comply with this condition.	Non-compliant	Recommendation 5.	Future IEAs to be prepared and submitted within the 3 month timeframe, or the audit team is to write to the Department and seek an extension, setting out the reasons as to why an extension should be granted.
<b>EPL 2796</b>						
<b>L5.2</b>	The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal. Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation sequence and/or offset delay being too small. No exceedances from 2024 and 2025.	Non-compliant	Recommendation 6.	Continue monitoring blasts and follow blasting contractor recommendations for location of blast holes and sequence timing. Continue monitoring and if further exceedances occur, consider the need to modify blasting methodology.
<b>M8.1</b>	To assess compliance with the noise limits of this licence, attend noise monitoring must be undertaken in accordance with the conditions of this licence and: a) during a period of normal quarry operations; b) at each one of the noise monitoring locations listed in the noise limits table of this licence; c) occur once annually in the reporting period; and d) occur during the night period as defined in the NSW Noise Policy for Industry, and in conjunction with an asphalt campaign if any such campaign occurs within the quarterly monitoring period. <b>Note:</b> The extent and frequency of noise monitoring required by this licence will be reviewed upon request after eight quarterly monitoring campaigns.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Noise monitoring generally complied with this requirement, but monitoring could not be conducted at point 13 due to refusal of access.	Non-compliant	Recommendation 7.	Holcim should review options for relocation of the monitoring location which will be updated in the Noise Management Plan. Holcim to seek approval for the updated monitoring location with DPHI and EPA.  The audit team is advised this process is already underway at the time of finalising this IEA.
<b>R4.2</b>	The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return: a) the date and time of the blast; b) the location of the blast on the premises; c) the blast monitoring results at each blast monitoring station; and d) an explanation for any missing blast monitoring results.	1.02, 14.05, 8.05, 8.06, 8.07	"Anecdotal evidence suggests these reports are emailed directly to the EPA following submission of each annual return, as they cannot be uploaded into the econnect system along with an annual return.  Documentary evidence regarding submission of the blasting reports was not provided to the audit team during this IEA."	Non-compliant	Recommendation 8.	Ensure that a Blast Monitoring Report is provided to the EPA with each Annual Return. Ensure documentary evidence is saved to file and made available for future IEAs.
<b>R4.3</b>	The licensee must report any exceedance of the licence blasting limits to the EPA's Environment Line as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.	1.02	No records could be produced to demonstrate that the blasting exceedances during the audit period were reported to the NSW EPA as soon as practicable. They were reported via annual returns, but that pathway does not comply with this condition.	Non-compliant	NA	Refer to Recommendation 4.



Table 12: Assessment of previous audit non-compliance.

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
<b>DA213-10-99 (MOD 5)</b>					
Schedule 2, Condition 4	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; (b) any reviews, reports or audits, commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents.	(2019) During the preparation of the 2016 IEA, OPIE indicated they would like the EMS to be resubmitted following the completion of the 2 No evidence was supplied during the 2022 IEA to suggest that the EMS has been updated since this recommendation.016 IEA.	Non-compliant	Compliant	EPA site inspection 7 April 2025 - checking PIRMP process - no follow up. 16 March 2022 and earlier. Department of planning last inspection 16 April 2024. Correspondence and requests from DPPI - requested that the implementation of the 2022 IEA be reported on in the following AEMR - this request was complied with in 2023 AEMR.
Schedule 2, Condition 18	The Applicant shall provide annual quarry production data to DRE using the standard form for that purpose; and report these data in the Annual Review (see condition 4 of Schedule 5).	Evidence of submission of annual quarry production data to DRE using the standard form was not able to be supplied during the audit process.	Non-compliant	Compliant	Evidence of submission to DRE / Resources Regulator was sighted on a central (corporate) spreadsheet (2025 - ticket number ROY000885). Spreadsheet for internal tracking of submissions etc. sighted. Production data (extracted total) is presented in the Annual Reviews: 2022 (calendar year) - 465,466 t. 2022-23 (financial year) - 419,158.1 t. 2023-24 (financial year) - 443,485 t.
Schedule 3, Condition 1	The Applicant shall ensure that the noise generated by the development does not exceed the criteria in Table 2 or Table 3 at any residence on privately-owned land. Notes: • Receiver locations are shown on the figure in Appendix 2. • Condition 10 of Schedule 2 prohibits quarrying operations during the hours 10 pm- 6 am. Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW industrial Noise Policy (as may be updated from time-to-time). Appendix 3 details the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria. However, these criteria do not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.	One non-compliance was recorded during noise monitoring within the reporting period. An exceedance of 3dB was recorded due to a bulldozer conducting overburden maintenance during the morning shoulder period. The bulldozer was immediately relocated to a lower level within the pit and a long-term management measure was implemented to ensure that overburden maintenance is not conducted within the morning shoulder period.	Non-compliant	Compliant	Holcim have a negotiated agreement with the property owner of R1, excluding this receptor from the approved noise criteria. Receivers R8, R9 and R10 are Holcim-owned, also excluded from approved criteria. Evidence of advising DPE was provided in the 2019 IEA.  Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period. Site management also discussed corrective action taken following a noise exceedance in the previous audit period. The available lines of evidence suggest the Site has met these criteria.
Schedule 3, Condition 5	The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 4. However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 4, and the Applicant has advised the Department in writing of the terms of this agreement.	One blast on 27/01/2022 exceeded the allowable airblast overpressure dB limit of 115. The blast was measured at 119.1 dB at monitoring point R2 (112 Spicers Road). No agreement exists with this receiver and as such this remains a non-compliance.	Non-compliant	Non-compliant	Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal.  Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
					<p>sequence and/or offset delay being too small.</p> <p>Exceedance on 28 April 2023 of 6.1 mm/sec at R2 (reported to EPA and DPHI). On 10 May 2023 Holcim provided an additional Blast Exceedance Result Report to the Department as per Schedule 5 Condition 6 of the development consent. The finding of this report determined that the use of soil spikes likely lead to unreliable results. This result was then excluded from maximum values going forward.</p> <p>No exceedances from 2024 and 2025. DPHI issued an official caution in March 2025 for failure to report the exceedances in 2023.</p>
Schedule 3, Condition 19(b)	<p>(b) Surface Water Management Plan that includes:</p> <ul style="list-style-type: none"> <li>• a detailed description of the surface water management system for the development, including the: <ul style="list-style-type: none"> <li>o clean water diversion system;</li> <li>o erosion and sediment controls; and</li> <li>o the water storages required for each stage of the development;</li> </ul> </li> <li>• identification of all reasonable and feasible measures to improve the quality of surface water on the site, particularly those measures required to improve the water quality in the main dam, and a timeframe for the implementation of any identified improvements;</li> <li>• the measures that would be implemented to minimise water use on site;</li> <li>• surface water impact assessment criteria,</li> <li>• a program to monitor surface water quality, and</li> <li>• a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the development; and</li> <li>• reporting procedures.</li> </ul>	<p>2019) Updates to the SWMP may be required following completion of construction of the dish drain and sump along the Main Access Road (at the western base of the Main Dam) (see Condition 18 of Schedule 3 for discussion in Table 3-2). Review of available documentation indicates that recommendations from the 2016 IEA relating to the SWMP have not been actioned. Therefore, non-compliance has been found and these recommendations remain relevant</p> <p>(2022) As outlined in the 2019 IEA, the SWMP does not provide a response procedure for exceedance events nor does it provide a reporting procedure for exceedance events. The plan has not been updated since the 2019 IEA and as such remains non-compliant.</p>	Non-compliant	Compliant (Observation raised)	<p>Audit reference materials made publicly available did not display author or document approval markings; however, such approvals and the Department's approval of this Management Plan were verified during prior Independent Environmental Audits.</p> <p>Section 6 of the Site Water Management Plan (SWMP) provides a thorough analysis of water supply sources, site consumption patterns, storage infrastructure, operational water use, management procedures, and environmental water loss.</p> <p>The 2019 and 2022 IEAs found the Management Plan to be non-compliant with the requirement to include a 'plan to respond to any exceedances of the performance criteria and mitigate adverse surface water impacts of the development'.</p> <p>The Management Plan has not been updated since the 2022 IEA. However, the audit team refers to Table 8 of the plan, which notes flocculant is to be added following any exceedance of the TSS criterion. The audit team does consider this to be a response to exceedance, as required by the Condition, although there is an opportunity to expand this to other pollutants. The Plan does not explicitly discuss how to respond to downstream impacts in the event of a release of water outside of criteria. Further supporting the decision to find this condition compliant, the audit team notes that the Department's approval of this Management Plan could be taken as endorsement that the Proponent has met these requirements in preparing the plan.</p>
Schedule 3, Condition 23(a)	<p>By 31 March 2016, the Applicant shall implement a strategy to offset the impacts of clearing 1.28 ha of Small-fruited Grey Gum- Tallowwood shrubby open forest on coastal foothills of the southern North Coast vegetation community by either:</p> <p>(a) entering into a Biobanking agreement under the Threatened Species Conservation Act 1995 to retire at least the number of Ecosystem Credits assessed using the Biobanking Credit Calculator; or (b) implementing a strategy to provide a Biodiversity Offset Area of at least 7 ha of Small-fruited Grey Gum - Tallowwood shrubby open forest on coastal foothills of the southern North Coast vegetation community,</p>	<p>The BRMP was generally implemented throughout the reporting period with the exception of one penalty notice issued by DPE on 21 May 2021. Holcim failed to undertake a pre-clearance survey prior to clearing vegetation in 2019 and failed to appropriately monitor and assess rehabilitated areas during 2019.</p>	Non-compliant	Not triggered	<p>Per the 2022 IEA - As reported in the 2016 and 2019 IEAs, correspondence between Holcim and DPIE confirming DPIE's acceptance of a section 88b Covenant being implemented has been previously sighted. As specified in Section 8.1 of the 2021 AR, instruments for protection of the Offset Area were secured in 2020. Holcim have elected to offset impacts through the selection of 23 (b).</p>



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
	in consultation with OEH and to the satisfaction of the Secretary.				
Schedule 3, Condition 27	<p>Within 12 months of the approval of the Biodiversity and Rehabilitation Management Plan, the Applicant shall lodge a Rehabilitation and Conservation Bond with the Department to ensure that the biodiversity offset strategy and the rehabilitation of the site is implemented in accordance with the performance and completion Criteria set out in the Biodiversity and Rehabilitation Management Plan. The sum of the bond shall be determined by:</p> <p>(a) calculating the cost of implementing the biodiversity offset strategy and rehabilitating the site, and</p> <p>(b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary.</p> <p><b>Note:</b> If the rehabilitation of the site and the implementation of the biodiversity offset strategy is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site and the implementation of the biodiversity strategy is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.</p>	Payment of the Rehabilitation and Conservation Bond was due in August 2019 however was not paid until 1/06/2020. The 2019 IEA identified this as a non-compliance and after discussions with DPE, the bond payment was made by Holcim.	Non-compliant	Not triggered	<p>2022 IEA: Non-compliant - "Payment of the Rehabilitation and Conservation Bond was due in August 2019 however was not paid until 1/06/2020. The 2019 IEA identified this as a non-compliance and after discussions with DPE, the bond payment was made by Holcim. The DPE approval letter includes approval of suitably qualified experts to undertake the cost calculation. This will remain as a non-compliance as it relates to initial timing of bond payment."</p> <p>Considered Not Triggered in this audit period. There is a bond in place.</p>
Schedule 3, Condition 28	<p>Within 3 months of each Independent Environmental Audit (see condition 8 of Schedule 5), the Applicant shall review, and if necessary revise, the sum of the Rehabilitation and Conservation Bond to the satisfaction of the Secretary. This review must consider the:</p> <p>(a) effects of inflation;</p> <p>(b) likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development) and implementing the biodiversity offset strategy; and</p> <p>(c) performance of the implementation of the rehabilitation of the site and the biodiversity offset strategy to date.</p>	As the initial payment of the RC Bond was not made until June 2020, this is outside of the 3 month timeframe following the Independent Audit undertaken in September 2019 during which the sum must be reviewed and revised (if required). A review was not able to be undertaken within the timeframe as initial submission had not yet been completed.	Non-compliant	Non-compliant	The 2022 IEA was submitted on 27/3/2023. There is a record of a bond update being submitted on 27/7/2023, four months after the latest date that could be considered 'completion' of the 2022 IEA.
Schedule 3, Condition 29(a)	<p>The Applicant shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with Aboriginal stakeholders;</p> <p>(b) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(c) describe the measures that would be implemented to:</p>	A review of the ACHMP shows that recommendations from the 2016 and 2019 IEAs have not been adopted, as no updates to the consultation section of the ACHMP have been made and no evidence available to indicate that Holcim have tried to close out this lack of consultation in the ACHMP. Forster LALC and Purfleet-Taree LALC have both been attempted to be contacted as per the ACHMP Rev B. Additionally, no approval of the ACHMP is evident within the document, however the requirement for Department approval is noted in Section 1.4	Non-compliant	Compliant	<p>Activities are operated in accordance with the Aboriginal Cultural Heritage Management Plan (ACHMP) (31/08/2018).</p> <p>a) An attempt to consult with LALCs was made in 2015 but no responses were received. No ongoing consultation has been carried out and none has been required as the defined triggers in the management plan have not occurred.</p> <p>b) The Plan is dated 31 August 2015 and we understand was submitted by this date, but it is outside of this audit period.</p> <p>c) Current extraction area far from sites. they are physically marked.</p>



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
	<ul style="list-style-type: none"> <li>manage known Aboriginal objects and sites;</li> <li>monitor all new surface disturbance on site for unidentified Aboriginal objects;</li> <li>manage the discovery of any human remains or previously unidentified Aboriginal objects on site; and</li> </ul> (d) ensure ongoing consultation with Aboriginal stakeholders in the management of any Aboriginal cultural heritage values on site.				<p>d) The ongoing consultation triggers in the plan have not occurred.</p> <p>2022 IEA: Non-compliant - "A review of the ACHMP shows that recommendations from the 2016 and 2019 IEAs have not been adopted, as no updates to the consultation section of the ACHMP have been made and no evidence available to indicate that Holcim have tried to close out this lack of consultation in the ACHMP. Forster LALC and Purfleet-Taree LALC have both been attempted to be contacted as per the ACHMP Rev B. Additionally, no approval of the ACHMP is evident within the document, however the requirement for Department approval is noted in Section 1.4"</p> <p>This audit team has a different view on this condition to the previous two audit teams. The audit team has not been provided evidence of Departmental approval of the plan; however, other lines of evidence (i.e. AEMRs and annual review correspondence for management plans) indicate the Department has received and approved the ACHMP. Noting that, this audit team believes the requirement to prepare the ACHMP in consultation with aboriginal stakeholders has been met via the attempt to consult and the Department's endorsement of the level of consultation that is evidenced in its acceptance of the plan. In terms of strict compliance with the requirements of this Condition, this audit team believes the Proponent is compliant. However, there is opportunity for improvement in this aspect and an observation has been raised for action.</p>
Schedule 3, Condition 33(c)	The Applicant shall keep accurate records of: (a) the amount of quarry products, including asphalt, transported from the site (calendar month and Year); (b) the number of laden vehicle movements to and from the site (day, calendar month and year); and (c) publish these records on its website at the end of each calendar quarter.	At time of the audit, no truck movement data has been posted on the site website since 2020. Records are required to be posted to the website at the end of each calendar quarter.	Non-compliant	Compliant	<p>Annual truck movement summaries reviewed for data during the audit period (2022, 2023, 2024 and YTD 2025).</p> <p>a) Tonnage of transported products transported from the site for each calendar month, quarter, and year are included in the summaries.</p> <p>b) Number of laden vehicle movements per day is presented in these summaries.</p> <p>c) Website was accessed August 2025 and up to date truck data for 2025 was available.</p>
Schedule 4, Condition 1	As soon as practicable after obtaining monitoring results showing an exceedance of any relevant criteria in Schedule 3, the Applicant shall notify affected landowners in writing of the exceedance, except where a negotiated agreement has been entered into in relation to that impact, and provide regular monitoring results to each affected landowner until the development is complying with the relevant criteria.	One over pressure exceedance from a discreet blasting event in Feb 2022 occurred. A discussion was held with an affected sensitive receiver who was not disaffected. Subsequent blasts have not resulted in overpressure exceedances due to a change in blasting subcontractors. Exceedance was minor and would have been negated if annual blast numbers had exceeded 20. EPA did not take action against Holcim and incident reported to the EPA.	Non-compliant	Not triggered	<p>The blast exceedance in April 2023 was found to be caused by improper monitoring device installation and hence was not considered an exceedance and highly questionable, therefore, if any resident was 'affected'.</p> <p>For the 6 June 2023 exceedance - Blast overpressure of 115.4 dB (limit of 115 dB), which was 6.25% of annual blasts (limit of 5%) - it was unclear whether the individual exceedance would be outside the 5% allowance for non-conforming results within the year. Once 2023 had ended and it was apparent the 5% allowance was exceeded, the Proponent determined that due to (a) the size of the exceedance, (b) the context of other complying results and (c) the lack of complaints or negative feedback from neighbours suggested the landowner was not 'affected' and hence were not affected.</p> <p>The audit team accepts this position and cannot conclude, with a high degree of certainty, that the landowner was 'affected'. Therefore the audit team accepts that the requirement to notify was not triggered in this audit period.</p>



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
Schedule 5, Condition 2	<p>The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant shall, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur,</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p>	Non-compliances under conditions in Schedule 3 were recorded during the reporting period. One penalty notice was issued during the reporting period for failing to comply with the BRMP (21 May 2021).	Non-compliant	Non-compliant	<p>The audit team concludes that, on the few occasions where exceedances of site criteria have occurred (or other issues, such as equipment failure) have occurred, the Proponent has taken appropriate steps to rectify the issue and made reasonable efforts to prevent future non-compliance.</p> <p>In terms of compliance with requirement (b) regarding notification of the Department 'at the earliest opportunity', the Department issued an official caution in March 2025 for failure to report the blasting exceedances in 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasting overpressure limit had crystallised, a precautionary notification should have been made to the Department. The exceedances were discussed in the 2023 AEMR submitted in Q2 2024, but the AEMR is not considered an appropriate vehicle for notification of individual exceedances.</p>
Schedule 5, Condition 3	The Applicant shall ensure that the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include (e) a contingency plan to manage any unpredicted impacts and their consequences;	The updated AQMP (2021), BRMP and ACHMP provide plan-specific Contingency Plans or similar, however the SWMP and NBMP do not provide a Contingency Plan or similar method for addressing unpredicted impacts.	Non-compliant	Not triggered	Points have been raised elsewhere, regarding adequacy of the preparation and implementation of specific management plans. However, noting that no management plans were prepared within this audit period, this condition is not triggered for the purposes of this audit.
Schedule 5, Condition 5	<p>Within 3 months of the submission of an:</p> <p>(a) annual review under condition 4 above;</p> <p>(b) incident report under condition 6 below;</p> <p>(c) audit report under condition 8 below; and</p> <p>(d) any modifications to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p><b>Note:</b> This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	With the exception of the AQMP, management plans have not been updated during the reporting period despite audit recommendations, some changes in site operations and changes in legislation.	Non-compliant	Compliant	<p>Correspondence has been obtained to demonstrate the Proponent reviewed the management plans following the 2022 IEA, and 2022 and 2023 annual reviews. The submission timeframe for these letters complies with the 3 month period specified in this condition.</p> <p>We note the recommendations of previous IEAs regarding management plans. This audit team does not necessarily agree with the Proponent's conclusion in their reviews that the management plans do not require revision; however, strict compliance with this condition relates to the administrative process of reviewing the plans. This audit team believes that several of the plans, such as the SWMP, ACHMP, and noise management plan should be revised to reflect changes in legislation, recommendations from previous IEAs and changed conditions (i.e. pit expansion, layout changes and removal of the asphalt plant).</p> <p>However, it is the professional opinion of this audit team that the management plans are broadly fit for purpose and their ongoing use does not create any major inconsistencies or risk of environmental harm. The audit team does not have sufficient evidence to take a contrary position to the Proponent and find that their conclusions regarding adequacy of plans is incorrect.</p>
Schedule 5, Condition 9	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	Due to unforeseen environmental and site staffing challenges within Holcim during the audit period, this audit report will not be finalised within 3 months of the site audit.	Non-compliant	Non-compliant	Department approval of the audit team was received on 27 June 2022, three months since this date is 27 September 2022, which is taken as the due date for submission. Final Report v1.0 is dated 2 March 2023, outside of the due date. Submission date was 27/3/2023 as confirmed in correspondence from the Department



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
					dated 3/8/2023. This condition was not complied with for the 2022 audit, the submission deadline for which fell within this audit period. We note that due to the date on the 2022 IEA audit report, the Consultant engaged did not provide the report in a timely manner to allow the Proponent to comply with this condition.
Schedule 5, Condition 10	By 31 August 2015, the Applicant shall: (a) make the following information publicly available on its website: <ul style="list-style-type: none"> <li>the documents listed in condition 2 of Schedule 2;</li> <li>current statutory approvals for the development;</li> <li>approved strategies, plans or programs;</li> <li>a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent;</li> <li>a complaints register, which is to be updated on a quarterly basis;</li> <li>the annual reviews (over the last 5 years);</li> <li>any independent environmental audit, and the Applicant's response to the recommendations in any audit; and</li> <li>any other matter required by the Secretary; and</li> </ul> (b) keep this information up-to-date, to the satisfaction of the Secretary.	No evidence is available on the website that plans are approved and 2021 Annual Review is not available on the website. Previous audit responses and recommendations are also not available.	Non-compliant	Compliant	Review of the website has confirmed: <ul style="list-style-type: none"> <li>documents listed in condition 2 of Schedule 2 are available.</li> <li>current statutory approvals are available.</li> <li>strategies, plans or programs are available - the website does not have departmental approval correspondence, but that is not essential.</li> <li>environmental monitoring data available.</li> <li>complaints register is available, current to Q2 of 2025.</li> <li>annual reviews since 2015 are available.</li> <li>2016, 2019, and 2022 independent environmental audits are available. However, only the 2016 report includes the Applicant's response to recommendations.</li> <li>it is unknown whether any other matter was required by the Secretary for publishing on the website.</li> </ul> b) some data/information is not up to date, as identified above.
Appendix 3, Condition 3	Unless otherwise directed by the Secretary, attended quarterly monitoring is to be used to evaluate compliance with the relevant conditions of this consent. Note: The Secretary may direct that the frequency of attended monitoring increase or decrease at any time during the life of the development.	On 27 August 2021, an EPL variation was issued to EPL 2796 allowing noise monitoring to be undertaken on an annual basis instead of quarterly, based on no noise complaints being received since 2016 and ongoing compliance of noise monitoring results. Noise monitoring was carried out quarterly until 2021. This condition under the Modified Consent still directs noise monitoring to be undertaken quarterly; no evidence of approval of this change in monitoring frequency by the Secretary has been sighted.	Non-compliant	Compliant	The Consent requires quarterly monitoring "unless otherwise directed by the Secretary". Noting that the approved Noise Management Plan specifies annual monitoring, the approval of that plan is taken to be approval of a less frequent monitoring regime.
<b>EPL 2796</b>					
EPL P1.4	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.	Noise and weather monitoring are being carried out at the specified locations. Airblast overpressure and ground vibration have only been undertaken at Receptor R2 (EPA ID 3) during blasting operations. During an interview with M Neil, it was discussed that the wording from L5.2 ad L5.3 "...at either monitoring point 2 or 3 of this licence" had been interpreted as only one of these monitoring points needing to be monitored during blasting activities. Subsequently, only R2 (112 Spicers Rd) has had airblast overpressure and vibration monitoring carried out during the reporting period.	Non-compliant	Compliant	The points are consistent with those identified in Site Management Plans and physically marked and identified on Site.
EPL L3.2	The licensee must not: <ul style="list-style-type: none"> <li>Process more than 3000 tonnes of concrete "wash-out" per annum;</li> <li>Store more than 1000 tonnes of concrete "wash-out" on the premises at any one time.</li> </ul>	Imported concrete washout waste tonnages are approximated as per correspondence with P Wilson. By tonnage approximations, concrete waste imported onto the site totalled 3600T in 2020, 1770T in 2021 and 2862.9T in 2022 up until the date of the audit. 2020 tonnages exceeds the annual limit of 3000T p.a. It is noted that tonnages recorded within the spreadsheet are seemingly non approximated as of April 2022.	Non-compliant	Compliant	The Site has complied with these limits.



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
EPL L4.1	Noise generated at the premises must not exceed the noise limits in the tables below. The locations referred to in the tables below are indicated in the document titled: "Jandra Quarry Intensification of Production Environmental Assessment (DA 231-10-99 MOD 5)" Dated July 2014	As per L4.2.	Non-compliant	Compliant	Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period.
EPL L4.2	Noise from the premises during quarrying operations only must not exceed the limits specified in the following table:	Noise at the site was generally compliant across all locations during the reporting period. One exceedance was recorded at R2 (EPA13) in March 2021, with <39 dB recorded at a location with a limit of 36dB. This exceedance was due to a bulldozer conducting overburden maintenance as required every two years; the bulldozer was immediately relocated to a lower level within the pit and Holcim implemented a long-term management measure to ensure overburden maintenance is not conducted within the morning shoulder period, when the exceedance was recorded.	Non-compliant	Compliant	Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period.
EPL 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.	Results not recorded and retained as per M1.3.	Non-compliant	Compliant	Records of monitoring are presented in annual reviews. Records are being retained as required.
EPL M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Raw monitoring data available included PM10 monitoring data, which included a column for time of sampling that was largely incomplete. Other monitoring data available did not include sample times.	Non-compliant	Compliant	The continuous particulate monitoring is considered to comply with these requirements, as the samples are taken continuously by the device and not 'sampled' by an individual. The requisite information is available regarding the person/contractor responsible for installation and maintenance of the unit. Noise monitoring data complies with these requirements.  Water monitoring data for the site for the 2025 YTD tracking sheet includes the time the sample was taken and the initials of the person who collected the sample.
EPL R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	Copies of Annual Returns within the reporting period were not able to be supplied by Holcim and as such their contents could not be verified.	Non-compliant	Compliant	Annual returns have been submitted as required during the audit period. A non compliance has been reported in each annual return.
EPL R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	Annual Return for 2019 - 2020 received by EPA 8th July 2020 - outside of 60 day timeframe Annual Return for 2020 - 2021 received by EPA 5th July 2021 - outside of 60 day timeframe	Non-compliant	Compliant	Annual returns have been completed as required and submitted on time.
EPL R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years	Copies of Annual Returns within the reporting period were not able to be supplied by Holcim and as such their retention periods were not able to be verified.	Non-compliant	Compliant	Annual returns are being retained in excess of the 4 year minimum period.



Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2022 IEA	Compliance status in 2025 IEA	Comments
	after the Annual Return was due to be supplied to the EPA.				
EPL R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Copies of Annual Returns within the reporting period were not able to be supplied by Holcim and as such their contents could not be verified.	Non-compliant	Compliant	Annual returns are signed by appropriate personnel of the company who have been delegated appropriate authority by company officeholders (i.e. CEO and General Counsel).
EPL R4.1(a) – (c)	A noise compliance assessment report(s) must be submitted to the EPA with each Annual Return. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) an assessment of compliance with noise limits detailed in the limit conditions of this licence; b) details of all quarrying activities that were occurring during each of the periods of monitoring, and c) an outline of any management actions taken within the monitoring period to address any exceedances of the limits detailed in the limit conditions of this licence.	Copies of Annual Returns within the reporting period were not able to be supplied by Holcim and as such their contents could not be verified.	Non-compliant	Compliant	Anecdotal evidence suggests these reports are emailed directly to the EPA following submission of each annual return, as they cannot be uploaded into the econnect system along with an annual return. Documentary evidence has been provided for the 2024-25 year confirming it was submitted to the EPA and a follow up question was clarified.
Consultation NSW DPE	NA	Changes to reporting and notification processes have not been updated following a failure to notify DPE of non-compliances in 2019, 2020 and 2021.	Non-compliant	Not assessed	NA



## 7. List of appendices

- Appendix 1. Audit team endorsement.
- Appendix 2. SSD Consent
- Appendix 3. EPA Licence.
- Appendix 4. Independent Audit Declaration Form.
- Appendix 5. Audit Table.
- Appendix 6. Consultation records.
- Appendix 7. Photo log of Site Inspection.
- Appendix 8. Documentary evidence file.







NSW Planning ref: DA231-10-99-PA-21

Mr David Saville  
HOLCIM (AUSTRALIA) PTY LTD  
Cammeraygal Country  
LEVEL 40, Northpoint Tower, 100 Miller Street  
North Sydney NSW 2060  
10/06/2025

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Sent via the Major Projects Portal only

Subject: Jandra Quarry – Independent Environmental Audit Team Endorsement - 2025

Dear Mr Saville

I refer to your request for the Planning Secretary's endorsement of suitably qualified, experienced, and independent persons to conduct an Independent Environmental Audit (IEA) of the Jandra Quarry, submitted as required by Schedule 5 Condition 8 of development consent DA231-10-99 as modified (the consent) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 5 June 2025.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

In accordance with Schedule 5 Condition 8 of the consent and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Annabelle Tungol – Lead Auditor
- James Hammond – Auditor
- Rhys Thompson – Auditor

Please note, the Lead Auditor must attend the site inspection.

The IEA must be prepared, undertaken, and finalised in accordance with the conditions of consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.

Please ensure this correspondence is appended to the IEA Report.



Should you wish to discuss the matter further, please contact me on 02 65753401 or email [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au)

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters  
Team Leader  
Compliance

As nominee of the Planning Secretary







# Notice of Modification

## Section 75W of the *Environmental Planning and Assessment Act 1979*

As delegate of the Minister for Planning, I modify the development consent referred to in Schedule 1, as set out in Schedule 2.



Oliver Holm  
Executive Director  
Resource Assessments & Compliance

Sydney

13 / 3 / 2015

### SCHEDULE 1

The development consent (DA 213-10-99) for the Jandra Quarry, granted by the Minister for Urban Affairs and Planning on 30 March 2000.

### SCHEDULE 2

1. In Schedule 1, delete the words "the Applicant", "the Minister" and "the development".
2. Delete Schedule 2 and Attachments 1 & 2, and insert the following:



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## DEFINITIONS

Aboriginal object	Any item that provides evidence of the use of an area by Aboriginal people, as defined under the <i>National Parks and Wildlife Act 1974</i>
Annual review	The review required by condition 4 of Schedule 5
Applicant	CSR Pty Limited, Holcim(Australia) Pty Limited or any other person or persons who rely on this consent to carry out the development that is subject to this consent
BCA	Building Code of Australia
Council	Greater Taree City Council
Day	The period from 7 am to 6 pm, Monday to Saturday, and 8 am to 6 pm Sunday and Public Holidays
Department	Department of Planning and Environment
DRE	Division of Resources and Energy (within the Department of Trade and Investment, Regional Infrastructure and Services)
Development	The development as described in the documents listed in condition 2 of Schedule 2
EA (Mod 5)	Modification Application DA 231-10-00 Mod 5 and accompanying Environmental Assessment entitled <i>Jandra Quarry Intensification in Production</i> , and dated June 2014, and the Response to Submissions entitled <i>Jandra Quarry Intensification in Production Submissions Report</i> , dated October 2014.
EPA	Environment Protection Authority
EP&A Act	<i>Environmental Planning and Assessment Act 1979</i>
EP&A Regulation	<i>Environmental Planning and Assessment Regulation 2000</i>
EPL	Environment Protection Licence issued under the POEO Act
Evening	The period from 6 pm to 10 pm
Feasible	Feasible relates to engineering considerations and what is practical to build or carry out
Incident	A set of circumstances that: <ul style="list-style-type: none"> <li>causes, or threatens to cause, material harm to the environment; and/or</li> <li>breaches or exceeds the limits or performance measures/criteria in this consent</li> </ul>
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 consent, 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 consent
Material harm to the environment	Actual or potential harm to the health or safety of human beings or to ecosystems that is not trivial
Minister	Minister for Planning, or delegate
Mitigation	Activities associated with reducing the impacts of the development
Morning Shoulder	The period from 6am to 7am, Monday to Saturday
NOW	NSW Office of Water
OEH	Office of Environment and Heritage
POEO Act	<i>Protection of the Environment Operations Act 1997</i>
Previous approvals	(a) Development Application No. 231-10-99 and the accompanying Environmental Impact Statement, dated October, 1999; (b) Statement of Environmental Effects titled <i>Jandra Quarry – The Enlargement of an Overburden Emplacement Area</i> , dated June 2002; (c) Modification Application MOD 199-6-2002; (d) Modification Application DA 231-10-99 Mod 3 and the accompanying report titled <i>Section 96 Report for Readymix – Jandra Quarry</i> , dated August 2007; and (e) Modification Application DA 231-10-99 Mod 4 and document entitled <i>Jandra Quarry Clarification of Production Limits Environmental Assessment</i> , dated February 2012.
Public infrastructure	Linear and related infrastructure that provides services to the general public, such as roads, railways, water supply, drainage, sewerage, gas supply, electricity, telephone, telecommunications, etc.
Quarrying operations	The extraction, processing and transportation of extractive materials on the site and the associated removal of vegetation, topsoil and overburden.
Quarry products	Includes all saleable quarry products, but excludes tailings and other wastes
Reasonable	Reasonable relates to the application of judgement in arriving at a



Rehabilitation

RL

RMS

Secretary

decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements

The restoration of land disturbed by the development to a good condition, ensuring it is safe, stable, non-polluting environment and appropriately vegetated.

Reduced level

Roads and Maritime Services

Secretary of the Department, or nominee



## SCHEDULE 2 ADMINISTRATIVE CONDITIONS

### OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT

1. In addition to meeting the specific criteria in this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.

### TERMS OF CONSENT

2. The Applicant shall carry out the development generally in accordance with the:
  - (a) previous approvals;
  - (b) EA (Mod 5); and
  - (c) conditions of this consent.

*Note: The general layout and stages of the development are shown on the plans in Appendix 1.*

3. If there is any inconsistency between the documents identified in condition 2, the more recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.
4. The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:
  - (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent;
  - (b) any reviews, reports or audits, commissioned by the Department regarding compliance with this consent; and
  - (c) the implementation of any actions or measures contained in these documents.

### LIMITS ON CONSENT

5. The Applicant may carry out quarrying operations on the site until 31 March 2045.

*Note: Under this consent, the Applicant is required to rehabilitate the site and carry out additional undertakings to the satisfaction of the Secretary. Consequently, this consent will continue to apply in all other respects other than the right to conduct quarrying operations until the rehabilitation of the site and those undertakings have been carried out to a satisfactory standard.*

6. The Applicant shall not carry out quarrying operations below a level of RL 20 m AHD.
7. The Applicant shall not extract more than 16.5 million tonnes of quarry products from the site under this consent.
8. The Applicant shall not extract more than 490,000 tonnes of quarry products from the site in any calendar year.
9. The Applicant shall not transport more than 475,000 tonnes of quarry products from the site in any calendar year.

### HOURS OF OPERATION

10. The Applicant shall comply with the operating hours in Table 1.

Table 1 - Operating Hours

Day	Extraction and processing operations	Transportation operations	Asphalt Plant and associated transport (on a campaign basis)
Monday – Friday	6 am to 10 pm	6 am to 10 pm	24 hours a day
Saturday	6 am to 6 pm	6 am to 10 pm	24 hours a day
Sundays and Public Holidays	None	None	24 hours a day

The following activities may be carried out on the site outside the hours specified in Table 1:

- (a) return of trucks to the site prior to 12 midnight Monday to Saturday;



- (b) delivery or dispatch of materials as requested by Police, Fire Brigade or other similar authorities; and
- (c) emergency work to avoid the loss of lives, property and/or to prevent environmental harm.

In circumstances outlined in (b) and (c), the Applicant shall notify the Secretary and affected residents prior to undertaking the activities, or as soon as is practical thereafter.

#### **STRUCTURAL ADEQUACY**

- 11. The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.

#### **DEMOLITION**

- 12. The Applicant shall ensure that all demolition work is carried out in accordance with *Australian Standard AS 2601-2001: The Demolition of Structures*, or its latest version.

#### **PROTECTION OF PUBLIC INFRASTRUCTURE**

- 13. The Applicant shall:
  - (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and
  - (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.

*Note: This condition does not apply to damage to roads caused as a result of general road usage.*

#### **OPERATION OF PLANT AND EQUIPMENT**

- 14. The Applicant shall ensure that all the plant and equipment used at the site is maintained and operated in a proper and efficient manner.

#### **STAGED SUBMISSION OF ANY STRATEGY, PLAN OR PROGRAM**

- 15. With the approval of the Secretary, the Applicant may:
  - (a) submit any strategy, plan or program required by this consent on a progressive basis; and
  - (b) combine any strategy, plan or program required by this consent with any similar strategy, plan or program required for the development.

To ensure these strategies, plans or programs are updated on a regular basis, the Applicant may at any time submit revised strategies, plans or programs to the Secretary for approval.

##### **Notes:**

- While any strategy, plan or program may be submitted on a progressive basis, the Applicant will need to ensure that the existing operations on site are covered by suitable strategies, plans or programs at all times.
- If the submission of any strategy, plan or program is to be staged, then the relevant strategy, plan or program must clearly describe the specific stage to which the strategy, plan or program applies, the relationship of this stage to any future stages, and the trigger for updating the strategy, plan or program.

#### **IDENTIFICATION OF APPROVED LIMITS OF EXTRACTION**

- 16. Prior to 31 August 2015, the Applicant shall:
  - (a) engage a registered surveyor to mark out the boundaries of the approved area of extraction and the boundaries of the approved infrastructure area; and
  - (b) submit a survey plan of these boundaries to the Secretary.
- 17. The Applicant shall ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify the location of these boundaries and that quarrying operations are contained within the approved areas.

#### **PRODUCTION DATA**

- 18. The Applicant shall provide annual quarry production data to DRE using the standard form for that purpose; and report these data in the Annual Review (see condition 4 of Schedule 5).



### SCHEDULE 3 ENVIRONMENTAL PERFORMANCE CONDITIONS

#### NOISE

##### Noise Criteria

- The Applicant shall ensure that the noise generated by the development does not exceed the criteria in Table 2 or Table 3 at any residence on privately-owned land.

Table 2: Noise criteria – quarrying operations only dB(A)

Location	6 am – 10 pm (L <sub>Aeq</sub> (15 min))
R1	46
R5	40
R2, R4, R6	36
R7	35

Table 3: Noise criteria – quarrying operations & asphalt plant production combined dB(A)

Location	6 am – 10 pm (L <sub>Aeq</sub> (15 min))	10 pm – 6 am	
		(L <sub>Aeq</sub> (15 min))	(L <sub>A1</sub> (1 min))
R1	48	46	51
R5	41	39	51
R4	40	39	51
R2, R6	40	35	48
R7	36	35	48

*Notes:*

- Receiver locations are shown on the figure in Appendix 2.
- Condition 10 of Schedule 2 prohibits quarrying operations during the hours 10 pm – 6 am.

Noise generated by the development is to be measured in accordance with the relevant requirements of the *NSW Industrial Noise Policy* (as may be updated from time-to-time). Appendix 3 details the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria.

However, these criteria do not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.

##### Additional Noise Mitigation Upon Request

- Upon receiving a written request from the owner of any residence on property R1 the Applicant shall implement additional noise mitigation measures (such as double glazing, insulation, or air conditioning) at the residence in consultation with the owner. These measures must be reasonable and feasible and directed towards reducing the noise impacts of the project on the residence.

If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.

However, the obligation to implement noise mitigation measures does not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land that sets aside noise mitigation measures under the terms of this consent, and the Applicant has advised the Department in writing of the terms of this agreement.



## Operating Conditions

3. The Applicant shall:
- implement best practice management to minimise the construction, operational and transportation noise of the development;
  - minimise the noise impacts of the development during meteorological conditions when the noise limits in this consent do not apply (see Appendix 3);
  - carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent; and
  - regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Secretary.

## Noise Management Plan

4. The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:
- be submitted to the Secretary for approval by 31 August 2015;
  - describe the measures that would be implemented to ensure:
    - compliance with the noise criteria in this consent;
    - best management noise minimisation practice is employed on site;
    - noise emissions from trucks on the site after 10 pm do not annoy neighbouring residents; and
    - the noise impacts of the development are minimised during any meteorological conditions when the noise limits in this consent do not apply; and
  - detail a monitoring program that will be put in place to measure noise from the development against the noise criteria in Table 2 and 3, and which:
    - includes quarterly attended monitoring for the first two years of each of the three Stages of the development, as shown in the three figures in Appendix 1 (this monitoring must take place within a 24 hour asphalt campaign, if any such campaign is conducted during the quarter), and thereafter annually unless the Secretary agrees otherwise; and
    - evaluates and reports on the effectiveness of the noise management system on site.

## BLASTING

### Blasting Impact Assessment Criteria

5. The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 4.

Table 4: Blasting criteria

Location	Airblast overpressure (dB(Lin Peak))	Ground vibration (mm/s)	Allowable exceedance
Any residence on privately owned land, or any public infrastructure	120	10	0%
	115	5	5% of the total number of blasts over a period of 12 months

However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 4, and the Applicant has advised the Department in writing of the terms of this agreement.

### Blasting Hours

6. The Applicant shall only carry out blasting on site between 9 am and 5 pm Monday to Friday and 9 am to 3 pm Saturday. No blasting is allowed on Sundays or public holidays, or at any other time without the written approval of the Secretary.

### Blasting Frequency

7. The Applicant may carry out a maximum of 2 blasts per month on site. This condition does not apply to blasts required to ensure the safety of the quarry or workers on site.

*Note: For the purposes of this condition a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the quarry.*



## Operating Conditions

8. The Applicant shall:
- implement best management practice to:
    - protect the safety of people and livestock in the areas surrounding blasting operations;
    - protect public or private infrastructure/property in the surrounding area from damage from blasting operations;
    - protect the Pacific Highway from flyrock from blasting operations; and
    - minimise the dust and fume emissions of any blasting;
  - operate a suitable system to enable the public to get up-to-date information on the proposed blasting schedule on site; and
  - carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.

## Blast Management Plan

9. The Applicant shall prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must:
- be submitted to the Secretary for approval by 31 August 2015;
  - describe the measures that would be implemented to ensure compliance with the blast criteria and operating conditions of this consent;
  - include a monitoring program for evaluating and reporting on compliance with the blasting criteria in this consent;
  - include a blast fume management protocol to demonstrate how emissions will be minimised including risk management strategies if blast fumes are generated;
  - include public notification procedures on the blasting schedule; and
  - include a protocol for investigating and responding to complaints.

## AIR QUALITY

### Air Quality Impact Assessment Criteria

10. The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Tables 5, 6 and 7 at any residence on privately-owned land

Table 5: Long-term impact assessment criteria for particulate matter

Pollutant	Averaging Period	<sup>d</sup> Criterion
Total suspended particulate (TSP) matter	Annual	<sup>a</sup> 90 µg/m <sup>3</sup>
Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a</sup> 30 µg/m <sup>3</sup>

Table 6: Short-term impact assessment criteria for particulate matter

Pollutant	Averaging Period	<sup>d</sup> Criterion
Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>a</sup> 50 µg/m <sup>3</sup>

Table 7: Long-term impact assessment criteria for deposited dust

Pollutant	Averaging Period	Maximum increase in deposited dust level	Maximum total deposited dust level
<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month	<sup>a</sup> 4 g/m <sup>2</sup> /month

Notes for Tables 5 to 7:

- Total impact (ie incremental increase in concentrations due to the development plus background concentrations due to all other sources);
- Incremental impact (ie incremental increase in concentrations due to the development on its own);
- Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and
- Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents, illegal activities or any other activity agreed to by the Secretary in consultation with the EPA.



## **Odour**

11. The Applicant shall not cause or permit the emission of offensive odour beyond the boundaries of the site.

## **Operating Conditions**

12. The Applicant shall:
- (a) implement best practice management to minimise the odour and dust emissions of the development;
  - (b) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent;
  - (c) regularly assess air quality monitoring data and relocate, modify and/or stop operations on site to ensure compliance with the air quality criteria in this consent;
  - (d) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see note d under Table 7); and
  - (e) minimise the area of surface disturbance and maximise progressive rehabilitation of the site, to the satisfaction of the Secretary.

## **Quarry-owned Land**

13. The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Tables 5, 6, and 7 at any occupied residence on quarry-owned land unless:
- (a) the tenant has been notified of any health risks associated with such exceedances in accordance with the notification requirements under Schedule 4 of this consent;
  - (b) the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice;
  - (c) air quality monitoring is regularly undertaken to inform the tenant of the actual particulate emissions at the residence; and
  - (d) data from this monitoring is presented to the tenant in an appropriate format for a medical practitioner to assist the tenant in making informed decisions on health risks associated with occupying the property, to the satisfaction of the Secretary.

## **Air Quality Management Plan**

14. The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:
- (a) be submitted to the Secretary for approval by 31 August 2015;
  - (b) describe the measures that would be implemented to ensure:
    - compliance with the relevant conditions of this consent;
    - best practice management is employed; and
    - the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;
  - (c) describe the proposed air quality management system; and
  - (d) include an air quality monitoring program that:
    - is capable of evaluating the performance of the development;
    - includes a protocol for determining any exceedances of the relevant conditions of consent;
    - effectively supports the air quality management system; and
    - evaluates and reports on the adequacy of the air quality management system.

## **Meteorological Monitoring**

15. For the life of the development, the Applicant shall ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the *Approved Methods for Sampling of Air Pollutants in New South Wales* guideline.

## **Greenhouse Gas Emissions**

16. The Applicant shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.



## SOIL AND WATER

### Water Supply

17. The Applicant shall ensure it has sufficient water for all stages of the development, and if necessary, adjust the scale of quarrying operations to match the available water supply.

### Surface Water Discharges

18. The Applicant shall ensure that all surface water discharges from the site comply with the discharge limits in any EPL which regulates water discharges from the site, or with section 120 of the POEO Act.

### Soil and Water Management Plan

19. The Applicant shall prepare and implement a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with the Council and NOW, by suitably qualified and experienced person/s whose appointment has been approved by the Secretary, and be submitted to the Secretary for approval by 31 August 2015.

In addition to the standard requirements for management plans (see condition 3 of Schedule 5) this plan must include a:

- (a) Site Water Balance that:
- includes details of:
    - sources and security of water supply, including contingency planning to ensure demand will be met under all climatic conditions;
    - the site water storage capacity and licensing requirements for all stages of the development;
    - water use and management on site; and
- (b) Surface Water Management Plan that includes:
- a detailed description of the surface water management system for the development, including the:
    - clean water diversion system;
    - erosion and sediment controls; and
    - the water storages required for each stage of the development;
  - identification of all reasonable and feasible measures to improve the quality of surface water on the site, particularly those measures required to improve the water quality in the main dam, and a timeframe for the implementation of any identified improvements;
  - the measures that would be implemented to minimise water use on site;
  - surface water impact assessment criteria;
  - a program to monitor surface water quality; and
  - a plan to respond to any exceedances of the performance criteria, and mitigate any adverse surface water impacts of the development; and
  - reporting procedures.

### On-Site Sewage Management

20. The Applicant shall manage on-site sewage to the satisfaction of Council and the EPA.

## BIODIVERSITY AND REHABILITATION

### Biodiversity and Rehabilitation Objectives

21. The Applicant shall implement a biodiversity offset strategy and rehabilitate the site to the satisfaction of the Secretary, in accordance with the rehabilitation strategy in the documents listed in condition 2 of Schedule 2 and the objectives in Table 8.

Table 8: Biodiversity and Rehabilitation objectives

Feature	Objective
Site (as a whole)	<ul style="list-style-type: none"><li>• Safe, stable and non-polluting.</li><li>• Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and has minimal visual impact when viewed from surrounding land.</li></ul>
Land identified in the biodiversity offset strategy and other vegetated land	<ul style="list-style-type: none"><li>• Conserved and enhanced with native, endemic vegetation.</li><li>• Containing self-sustaining ecosystems.</li></ul>



Surface Infrastructure	<ul style="list-style-type: none"> <li>Decommissioned and removed, unless the Secretary agrees otherwise.</li> </ul>
Quarry Benches	<ul style="list-style-type: none"> <li>Landscaped and vegetated using native tree and understorey species, to minimise the visual impact of the quarry.</li> </ul>
Quarry Pit Floor	<ul style="list-style-type: none"> <li>Landscaped and revegetated using native tree and understorey species.</li> </ul>

### Progressive Rehabilitation

22. The Applicant shall rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilisation measures must be implemented where reasonable and feasible to control dust emissions in disturbed areas that are not active and which are not ready for final rehabilitation.

*Note: It is accepted that parts of the site that are progressively rehabilitated may be subject to disturbance in the future.*

### Biodiversity Offset Strategy

23. By 31 March 2016, the Applicant shall implement a strategy to offset the impacts of clearing 1.28 ha of *Small-fruited Grey Gum - Tallowwood shrubby open forest on coastal foothills of the southern North Coast* vegetation community by either:
- entering into a Biobanking agreement under the *Threatened Species Conservation Act 1995* to retire at least the number of Ecosystem Credits assessed using the Biobanking Credit Calculator; or
  - implementing a strategy to provide a Biodiversity Offset Area of at least 7 ha of *Small-fruited Grey Gum - Tallowwood shrubby open forest on coastal foothills of the southern North Coast* vegetation community,
- in consultation with OEH and to the satisfaction of the Secretary.

### Long Term Security of Offset

24. By 30 September 2016, the Applicant shall make suitable arrangements to protect in perpetuity any Biodiversity Offset Area established under condition 23 above to the satisfaction of the Secretary.

*Note: For the purposes of this consent, suitable arrangements may include the use of Public Positive Covenants in combination with Restrictions on Use of Land on the land title/s of the Biodiversity Offset Area. Other arrangements such as the use of Biobanking Agreements or transfer of lands to the national parks estate would also be considered for their suitability.*

### Biodiversity and Rehabilitation Management Plan

25. The Applicant shall prepare and implement a Biodiversity and Rehabilitation Management Plan for the site to the satisfaction of the Secretary. This plan must:
- be prepared by suitably qualified person(s) whose appointment has been approved by the Secretary;
  - be prepared in consultation with OEH and Council, and submitted to the Secretary for approval by 31 August 2015;
  - describe the short, medium and long-term measures that would be implemented to:
    - manage the native vegetation and fauna habitat on the site;
    - implement the biodiversity offset strategy; and
    - ensure compliance with the biodiversity and rehabilitation objectives in Table 8, and progressive rehabilitation obligations in this consent;
  - include detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategy and the rehabilitation of the site, including triggers for any necessary remedial action;
  - include a detailed description of the measures that would be implemented to:
    - minimise impacts on threatened species, populations and habitats as a result of the quarrying activities on the site;
    - enhance the quality of native vegetation and fauna habitat across the site and in the biodiversity offset area;
    - landscape the site to minimise visual and lighting impacts;
    - minimise the impact of clearing on native fauna;
    - maximise the salvage of environmental resources from any area approved to be cleared – including tree hollows, vegetative and soil resources – for beneficial reuse;
    - provide two nest boxes for each tree-hollow destroyed by vegetation clearing;
    - control weeds and feral pests;
    - control erosion;



- control access; and
  - bushfire management;
- (f) include a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria;
  - (g) identify the potential risks to rehabilitation of the site and the implementation of the biodiversity offset strategy, and include a description of the contingency measures that would be implemented to mitigate these risks; and
  - (h) include details of who would be responsible for monitoring, reviewing, and implementing the plan.

#### **Habitat for Threatened Fauna Species**

26. The Applicant shall ensure that the Biodiversity Offset Area provides suitable habitat for all threatened fauna species that have potential habitat within the 1.28 ha of land proposed to be cleared under EA (Mod 5).

#### **Rehabilitation and Conservation Bond**

27. Within 12 months of the approval of the Biodiversity and Rehabilitation Management Plan, the Applicant shall lodge a Rehabilitation and Conservation Bond with the Department to ensure that the biodiversity offset strategy and the rehabilitation of the site is implemented in accordance with the performance and completion criteria set out in the Biodiversity and Rehabilitation Management Plan. The sum of the bond shall be determined by:
  - (a) calculating the cost of implementing the biodiversity offset strategy and rehabilitating the site, and
  - (b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary.

*Note: If the rehabilitation of the site and the implementation of the biodiversity offset strategy is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site and the implementation of the biodiversity strategy is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.*

28. Within 3 months of each Independent Environmental Audit (see condition 8 of Schedule 5), the Applicant shall review, and if necessary revise, the sum of the Rehabilitation and Conservation Bond to the satisfaction of the Secretary. This review must consider the:
  - (a) effects of inflation;
  - (b) likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development) and implementing the biodiversity offset strategy; and
  - (c) performance of the implementation of the rehabilitation of the site and the biodiversity offset strategy to date.

#### **ABORIGINAL CULTURAL HERITAGE**

29. The Applicant shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must:
  - (a) be prepared in consultation with Aboriginal stakeholders;
  - (b) be submitted to the Secretary for approval by 31 August 2015;
  - (c) describe the measures that would be implemented to:
    - manage known Aboriginal objects and sites;
    - monitor all new surface disturbance on site for unidentified Aboriginal objects;
    - manage the discovery of any human remains or previously unidentified Aboriginal objects on site; and
  - (d) ensure ongoing consultation with Aboriginal stakeholders in the management of any Aboriginal cultural heritage values on site.

#### **TRANSPORT**

##### **Operating Conditions**

30. The Applicant shall ensure that:
  - (a) all vehicles entering or leaving the site carrying material that is capable of generating wind-borne dust have their loads covered or suitably contained within the truck; and
  - (b) all laden vehicles leaving the site are cleaned of materials that may fall on the road, before leaving the site.



### **Pacific Highway Intersection**

31. The Applicant shall maintain the intersection of the Pacific Highway and the Jandra Quarry Access Road, for the duration of product transport from the site, to the satisfaction of the RMS.
32. The Applicant shall install and subsequently maintain street lighting at the intersection of the Pacific Highway and the Jandra Quarry Access Road, to the satisfaction of the RMS, prior to transporting quarry products from the site outside of the hours 7 am to 6 pm. Any works affecting the Pacific Highway must not take place without the prior approval of the RMS.

### **Monitoring of Product Transport**

33. The Applicant shall keep accurate records of:
  - (a) the amount of quarry products, including asphalt, transported from the site (calendar month and year);
  - (b) the number of laden vehicle movements to and from the site (day, calendar month and year); and
  - (c) publish these records on its website at the end of each calendar quarter.

### **VISUAL IMPACTS**

34. The Applicant shall:
  - (a) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development;
  - (b) ensure that all external lighting associated with the development complies with *Australian Standard AS4282 (INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting*, or its latest version; and
  - (c) take all practical measures to shield views of quarrying operations from users of public roads and privately-owned residences, to the satisfaction of the Secretary.

### **WASTE**

35. The Applicant shall:
  - (a) implement all reasonable and feasible measures to minimise the waste generated by the development;
  - (b) ensure that the waste generated by the development is appropriately stored, handled and disposed of; and
  - (c) monitor and report on effectiveness of the waste minimisation and management measures each calendar year, to the satisfaction of the Secretary.
36. Except as expressly permitted in an EPL, the Applicant must not receive waste at the site for storage, treatment, processing, reprocessing or disposal.

### **LIQUID STORAGE**

37. The Applicant shall ensure that all liquid storage facilities are protected by appropriate bunding, which must exceed 110% of the stored volume of the liquid.

### **DANGEROUS GOODS**

38. The Applicant shall ensure that the storage, handling, and transport of dangerous goods is done in accordance with the relevant *Australian Standards*, particularly AS1940 and AS1596, and the *Dangerous Goods Code*.

### **BUSHFIRE**

39. The Applicant shall:
  - (a) ensure that the development is suitably equipped to respond to any fires on site; and
  - (b) assist the Rural Fire Service, emergency services and National Parks and Wildlife Service as much as possible if there is a fire in the surrounding area.



## **SCHEDULE 4 ADDITIONAL PROCEDURES**

### **NOTIFICATION OF LANDOWNERS**

1. As soon as practicable after obtaining monitoring results showing an exceedance of any relevant criteria in Schedule 3, the Applicant shall notify affected landowners in writing of the exceedance, except where a negotiated agreement has been entered into in relation to that impact, and provide regular monitoring results to each affected landowner until the development is complying with the relevant criteria.

### **INDEPENDENT REVIEW**

2. If an owner of privately-owned land considers the development to be exceeding the relevant criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.
3. If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision the Applicant shall:
  - (a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to:
    - consult with the landowner to determine his/her concerns;
    - determine whether the development is complying with the relevant criteria in Schedule 3; and
    - if the development is not complying with these criteria then identify measures that could be implemented to ensure compliance with the relevant criteria; and
  - (b) give the Secretary and landowner a copy of the independent review.
4. If the independent review determines that the development is complying with the relevant criteria in Schedule 3, then the Applicant may discontinue the independent review with the approval of the Secretary.
5. If the independent review determines that the development is not complying with the relevant criteria in Schedule 3, then the Applicant shall:
  - (a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent expert, and conduct further monitoring to determine whether these measures ensure compliance; or
  - (b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.



## **SCHEDULE 5 ENVIRONMENTAL MANAGEMENT CONDITIONS**

### **Environmental Management Strategy**

1. The Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:
  - (a) be submitted to the Secretary for approval by 31 August 2015;
  - (b) provide the strategic framework for the environmental management of the development;
  - (c) identify the statutory approvals that apply to the development;
  - (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;
  - (e) describe the procedures that would be implemented to:
    - keep the local community and relevant agencies informed about the operation and environmental performance of the development;
    - receive, handle, respond to, and record complaints;
    - resolve any disputes that may arise during the course of the development;
    - respond to any non-compliance; and
    - respond to emergencies; and
  - (f) include:
    - copies of any strategies, plans and programs approved under the conditions of this development consent; and
    - a clear plan depicting all the monitoring required to be carried out under the conditions of this consent.

### **Adaptive Management**

2. The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation.

Where any exceedance of these criteria and/or performance measures has occurred, the Applicant shall, at the earliest opportunity:

- (a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur;
- (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and
- (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.

### **Management Plan Requirements**

3. The Applicant shall ensure that the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include:
  - (a) detailed 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 development or any management measures;
  - (c) a description of the measures that would 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 development; and
    - effectiveness of any management measures (see (c) above);
  - (e) a contingency plan to manage any unpredicted impacts and their consequences;
  - (f) a program to investigate and implement ways to improve the environmental performance of the development 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.*

#### **Annual Review**

4. By the end of March each year, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:
- (a) describe the development (including rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;
  - (b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against:
    - the relevant statutory requirements, limits or performance measures/criteria;
    - the monitoring results of previous years; and
    - the relevant predictions in the documents listed in condition 2 of Schedule 2;
  - (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;
  - (d) identify any trends in the monitoring data over the life of the development;
  - (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and
  - (f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the development.

#### **Revision of Strategies, Plans & Programs**

5. Within 3 months of the submission of an:
- (a) annual review under condition 4 above;
  - (b) incident report under condition 6 below;
  - (c) audit report under condition 8 below; and
  - (d) any modifications to this consent,
- the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.

*Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.*

#### **REPORTING**

##### **Incident Reporting**

6. The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.

##### **Regular Reporting**

7. The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.

#### **INDEPENDENT ENVIRONMENTAL AUDIT**

8. By 31 March 2016, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:
- (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
  - (b) include consultation with the relevant agencies;
  - (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);



- (d) review the adequacy of any approved strategy, plan or program required under the these approvals; and
- (e) recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals.

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

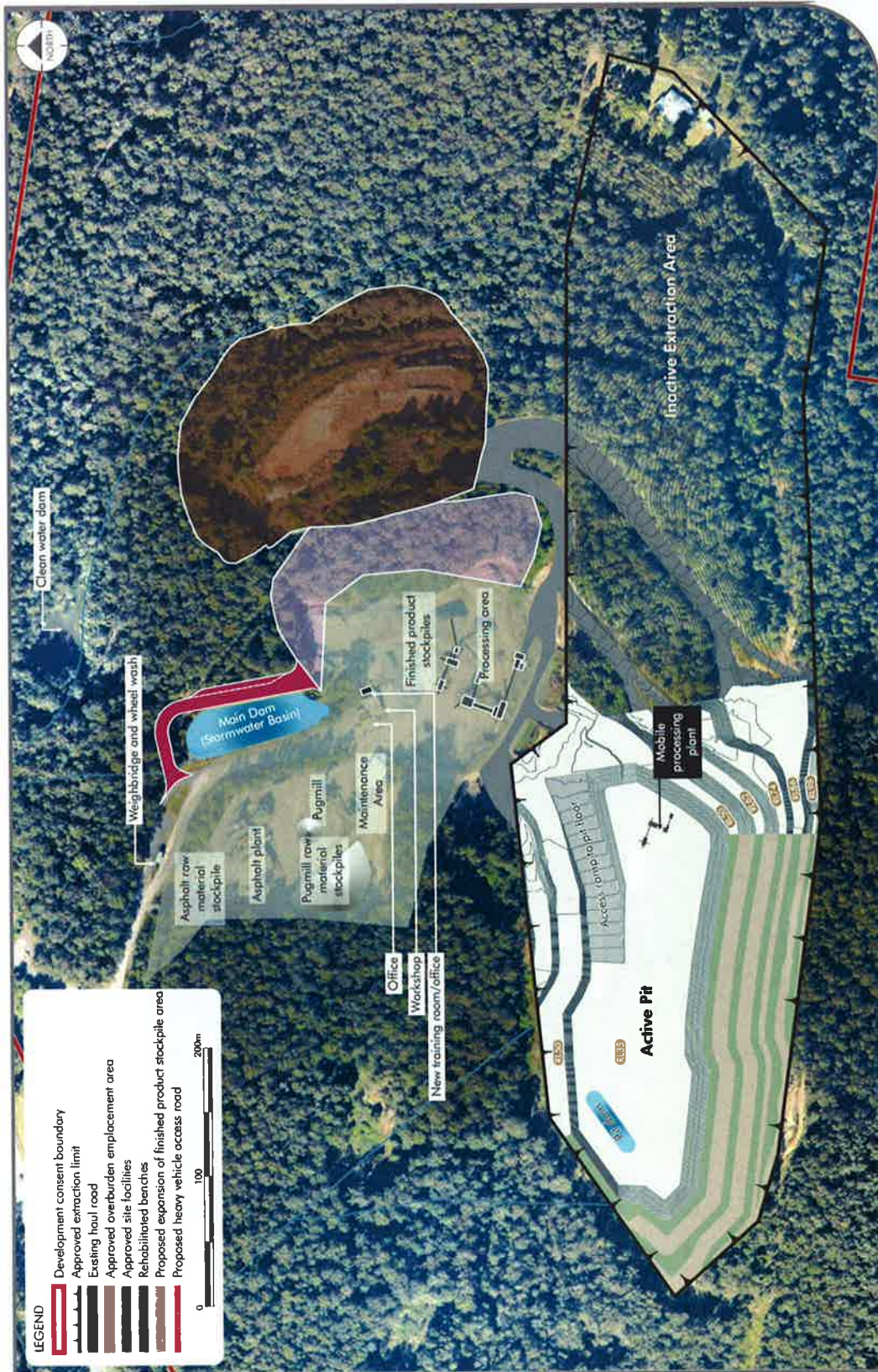
- 9. Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

#### **ACCESS TO INFORMATION**

- 10. By 31 August 2015, the Applicant shall:
  - (a) make the following information publicly available on its website:
    - the documents listed in condition 2 of Schedule 2;
    - current statutory approvals for the development;
    - approved strategies, plans or programs;
    - a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent;
    - a complaints register, which is to be updated on a quarterly basis;
    - the annual reviews (over the last 5 years);
    - any independent environmental audit, and the Applicant's response to the recommendations in any audit; and
    - any other matter required by the Secretary; and
  - (b) keep this information up-to-date, to the satisfaction of the Secretary.



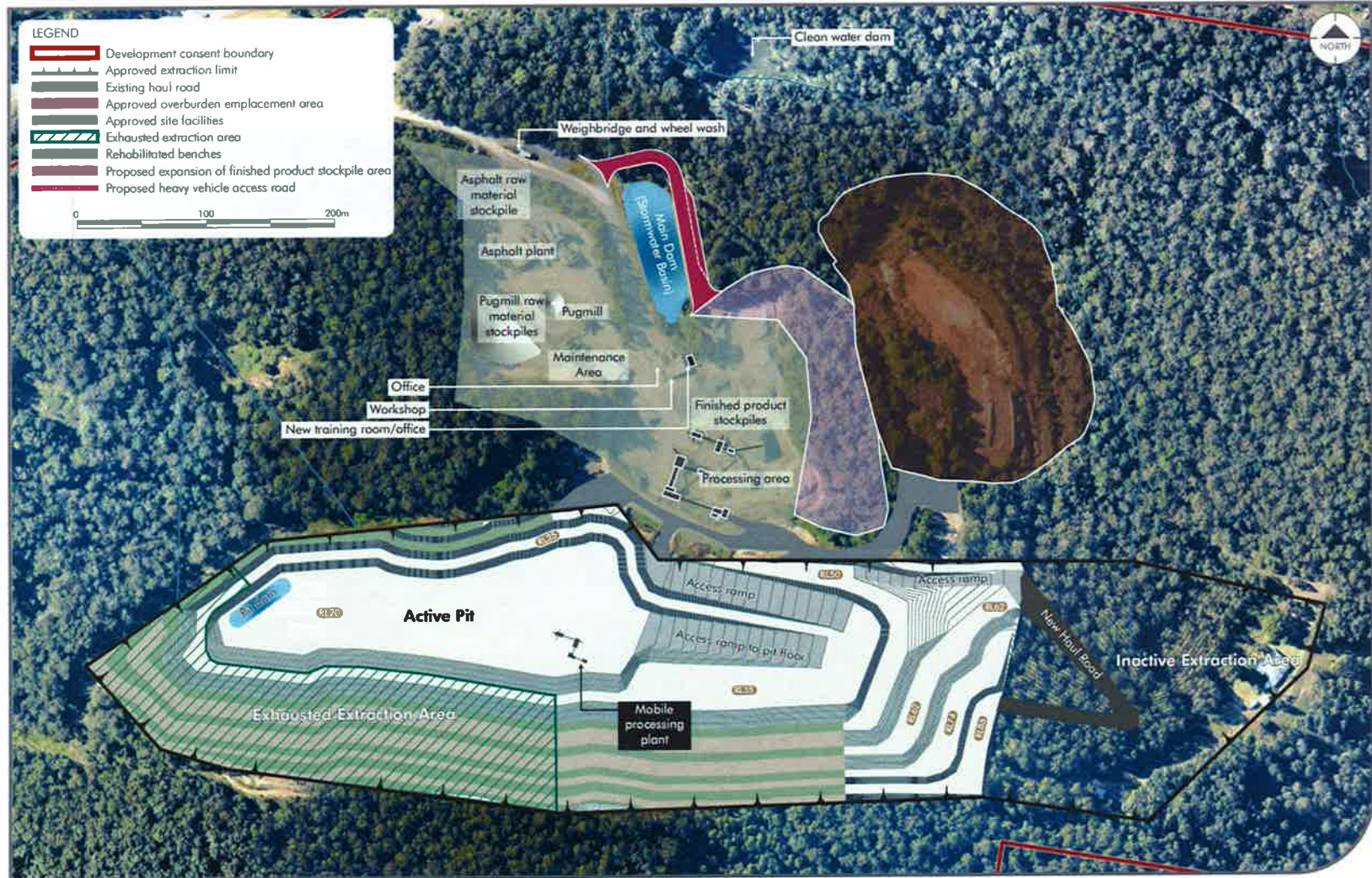
# APPENDIX 1: DEVELOPMENT PLANS – STAGES 1, 2 & 3



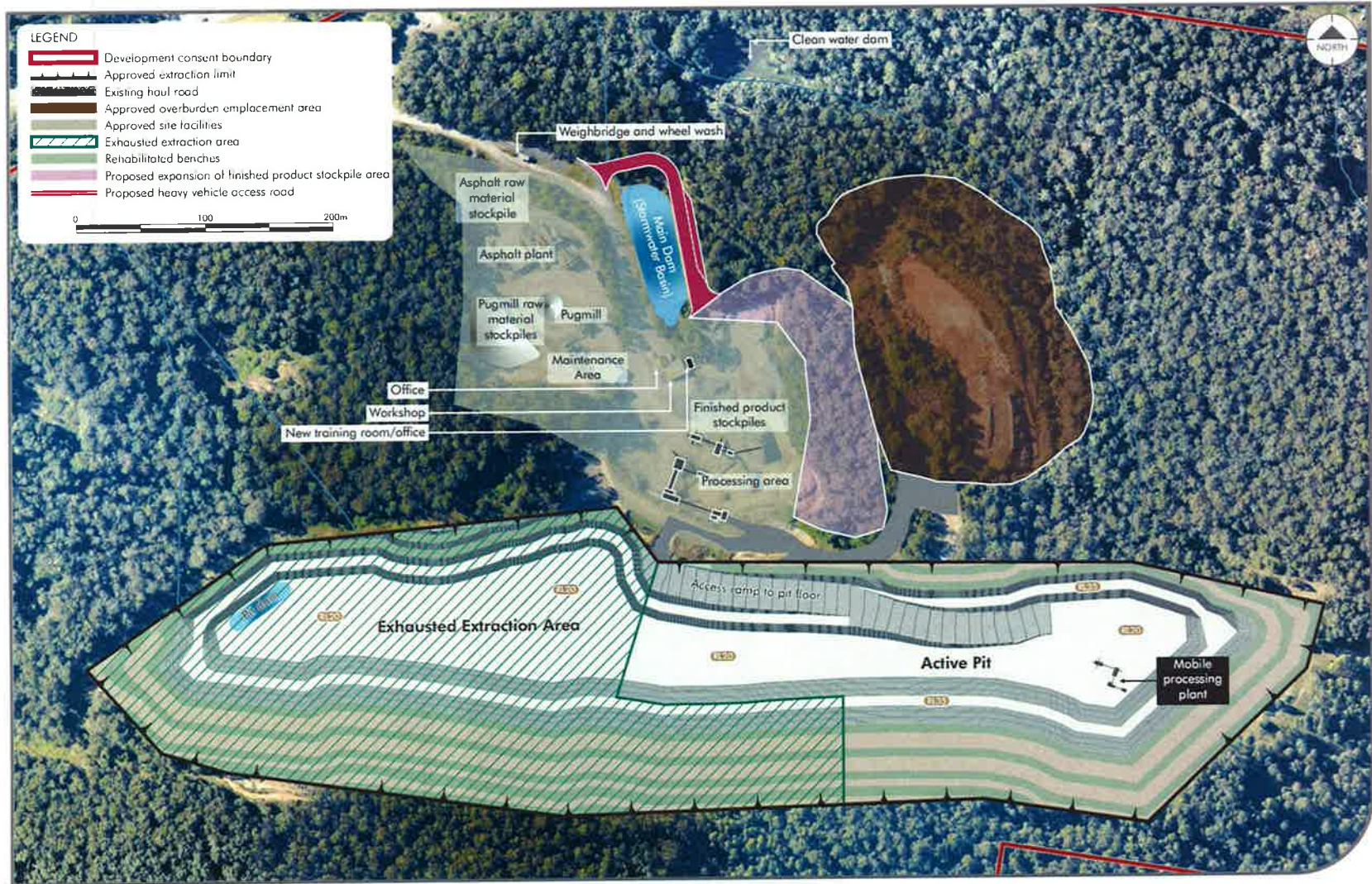
PROPOSED STAGE 1 EXTRACTION  
Environmental Assessment  
Jandra Quarry  
Possum Brush, New South Wales 2430











# PROPOSED STAGE 3 EXTRACTION

Environmental Assessment  
Jandra Quarry  
Possum Brush, New South Wales 2430



**APPENDIX 2:  
NOISE RECEIVER LOCATIONS**



- Blue circles show the location of privately-owned dwellings
- Orange circles show the location of company-owned dwellings



## APPENDIX 3 NOISE COMPLIANCE ASSESSMENT

### Applicable Meteorological Conditions

1. The noise criteria in Table 2 and 3 apply under all meteorological conditions except the following:
  - (a) wind speeds greater than 3 m/s at 10 m above ground level; or
  - (b) stability category F temperature inversion conditions and wind speeds greater than 2 m/s at 10 m above ground level; or
  - (c) stability category G temperature inversion conditions.

### Determination of Meteorological Conditions

2. Except for wind speed at microphone height, the data to be used for determining meteorological conditions shall be that recorded by the meteorological station required under condition 15 of Schedule 3.

### Compliance Monitoring

3. Unless otherwise directed by the Secretary, attended quarterly monitoring is to be used to evaluate compliance with the relevant conditions of this consent.

*Note: The Secretary may direct that the frequency of attended monitoring increase or decrease at any time during the life of the development.*

4. Unless otherwise agreed with the Secretary, this monitoring is to be carried out in accordance with the relevant requirements for reviewing performance set out in the *NSW Industrial Noise Policy* (as amended from time to time), in particular the requirements relating to:
  - (a) monitoring locations for the collection of representative noise data;
  - (b) meteorological conditions during which collection of noise data is not appropriate;
  - (c) equipment used to collect noise data, and conformity with Australian Standards relevant to such equipment; and
  - (d) modifications to noise data collected, including for the exclusion of extraneous noise and/or penalties for modifying factors apart from adjustments for duration.













# Environment Protection Licence

Licence - 2796

Licence Details	
Number:	2796
Anniversary Date:	01-May

Licensee
HOLCIM (AUSTRALIA) PTY LTD
LOCKED BAG 5007
BAULKHAM HILLS NSW 1755

Premises
JANDRA QUARRY
15312 PACIFIC HIGHWAY
POSSUM BRUSH NSW 2430

Scheduled Activity
Crushing, grinding or separating
Extractive activities
Resource recovery
Waste storage

Fee Based Activity	Scale
Crushing, grinding or separating	> 100000-500000 T annual processing capacity
Extractive activities	> 100000-500000 T annually extracted or processed
Recovery of general waste	Any general waste recovered
Waste storage - other types of waste	Any other types of waste stored

Contact Us
NSW EPA
4 Parramatta Square
12 Darcy Street
PARRAMATTA NSW 2150
Phone: 131 555
Email: <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a>
Locked Bag 5022
PARRAMATTA NSW 2124





# Environment Protection Licence

Licence - 2796

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# Environment Protection Licence

Licence - 2796

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# Environment Protection Licence

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Licence - 2796

## 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 annual return to be sent to the EPA

For each licence fee period you must pay:

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





# Environment Protection Licence

Licence - 2796

The EPA publication “A Guide to Licensing” contains information about how to calculate your licence fees. The licence requires that an Annual Return, comprising a Statement of Compliance and a summary of any monitoring required by the licence (including the recording of complaints), be submitted to the EPA. The Annual Return must be submitted within 60 days after the end of each reporting period. See condition R1 regarding the Annual Return reporting requirements.

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

### 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:

HOLCIM (AUSTRALIA) PTY LTD
LOCKED BAG 5007
BAULKHAM HILLS NSW 1755

subject to the conditions which follow.





# Environment Protection Licence

Licence - 2796

## 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 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.

Scheduled Activity	Fee Based Activity	Scale
Crushing, grinding or separating	Crushing, grinding or separating	> 100000 - 500000 T annual processing capacity
Extractive activities	Extractive activities	> 100000 - 500000 T annually extracted or processed
Resource recovery	Recovery of general waste	Any general waste recovered
Waste storage	Waste storage - other types of waste	Any other types of waste stored

Note: Waste conditions L3.1, L3.2 and L3.3 of this licence restrict the types of waste that may be received at the Premises.

A1.2 Notwithstanding the fee scales noted above, the licensee must not:

- (a) extract more than 490,000 tonnes of quarry products from the premises per calendar year; and
- (b) transport more than 475,000 tonnes of quarry products from the premises per calendar year

Note: This condition has been added to be consistent with development consent DA231-10-99 MOD 5.

### A2 Premises or plant to which this licence applies

A2.1 The licence applies to the following premises:

Premises Details
JANDRA QUARRY
15312 PACIFIC HIGHWAY
POSSUM BRUSH
NSW 2430
LOT 2 DP 255621, LOT 11 DP 790056, LOT 12 DP 790056, LOT 13 DP 790056, LOT 14 DP 790056, LOT 15 DP 790056

### A3 Information supplied to the EPA

A3.1 Works and activities must be carried out in accordance with the proposal contained in the licence application,



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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 points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.

<i>Air</i>			
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
11	Ambient PM10 monitoring		Receiver location R1 identified on map titled "Jandra Environmental Monitoring Locations" within the Holcim Environmental Management Strategy - Jandra Quarry. See EPA document DOC16/387391, EF13/3895.

- P1.2 The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.

- P1.3 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.

<i>Water and land</i>			
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description
1	Discharge quality monitoring	Discharge quality monitoring	Discharge from final sediment dam as shown in the CSR Readymix Site Photo - Jandra Quarry Water Monitoring Location Figure 1 provided to the EPA 13 May 2002

- P1.4 The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.



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## Noise/Weather

EPA identification no.	Type of monitoring point	Location description
2	Air blast overpressure & ground vibration peak particle velocity monitoring	Receiver location R4 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.
3	Air blast overpressure & ground vibration peak particle velocity monitoring	Receiver location R2 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residence and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.
4	Meteorological Station – to determine meteorological conditions for noise monitoring	Meteorological station adjacent to the "Main Dam" and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Air Quality Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.
13	Noise monitoring	Monitoring location R2 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.
14	Noise monitoring	Monitoring location R4 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.
15	Noise monitoring	Monitoring location R5 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.



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16	Noise monitoring	Monitoring location R6 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.
17	Noise monitoring	Monitoring location R7 in accordance with development consent 231-10-99 MOD 5 and identified on "Figure 1 Surrounding land use, residences and environmental monitoring locations" within the Holcim Noise and Blast Management Plan, Jandra Quarry 31/08/2015. See EPA document DOC16/387391, EF13/3895.

## 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.

### L2 Concentration limits

L2.1 For each monitoring/discharge point or utilisation area specified in the table\ 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\.

L2.4 Water and/or Land Concentration Limits

#### POINT 1

Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit
pH	pH				6.5-8.5



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Total suspended solids	milligrams per litre	50
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## L3 Waste

- L3.1 The licensee must not cause, permit or allow any waste to be received at the premises, except concrete "wash-out" waste from concrete batch plants. All other wastes are not permitted on the premises, except as expressly permitted by this licence.
- L3.2 The licensee must not:
- Process more than 3000 tonnes of concrete "wash-out" per annum;
  - Store more than 1000 tonnes of concrete "wash-out" on the premises at any one time.
- L3.3 Concrete 'wash-out' must be stockpiled on site in bunded areas and can be processed and blended with quarry raw product to produce quarry product(s).

## L4 Noise limits

- L4.1 Noise generated at the premises must not exceed the noise limits in the tables below. The locations referred to in the tables below are indicated in the document titled: "Jandra Quarry Intensification of Production Environmental Assessment (DA 231-10-99 MOD 5)" Dated July 2014
- L4.2 Noise from the premises during quarrying operations only must not exceed the limits specified in the following table:

EPA identification no.	Limit dB(A) LAeq(15 min) Shoulder, Day & Evening
15	40
13, 14, 16	36
17	35

- L4.3 Noise from the premises during operations including asphalt plant must not exceed the limits specified in the following table:

EPA identification no.	Limit dB(A) LAeq(15 min) Shoulder, Day & Evening	Limit dB(A) LAeq(15 minute) Night	Limit dB(A) LA1(1 minute) Night
15	41	39	51
14	40	39	51
13,16	40	35	48
17	36	35	48



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## Note:

1. *Condition 10 of Schedule 2 of development consent DA 213 -10-99 MOD 5 prohibits quarrying operations during the hours of 10 pm-6 am;*
2. *Receiver locations are shown on the figure in Appendix 2 of development consent DA 213-10-99 a copy of which has been filed as EPA document DOC15/85830;*
3. *Noise limits are in accordance with development consent DA 231-10-99 MOD 5;*
4. *A negotiated agreement is in place for Residence R1 as referred to in development consent DA 231-10-99 MOD 5 & any noise issues from this premises will be addressed by the Department of Planning and Environment.*

## L4.4 For the purpose of the conditions above:

- Shoulder, Day and Evening is defined as the period from 6am - 10pm
- Night is defined as the period from 10pm - 6am

## L4.5 Noise enhancing meteorological conditions

- a) The noise limits set out in condition L4.1. L4.2 and L4.3 apply under the following meteorological conditions specified in the table below.
- b) For those meteorological conditions not referred to in condition L4.5 a), the noise limits that apply are the noise limits in condition L4.1, L4.2 and L4.3 plus 5dB.

Assessment Period	Meteorological Conditions
Day	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Evening	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level.
Night	Stability Categories A, B, C and D with wind speeds up to and including 3m/s at 10m above ground level; or Stability category E and F with wind speeds up to and including 2m/s at 10m above ground level.

## L4.6 For the purposes of condition L4.5:

- a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as EPA monitoring point 4 (Condition P1.4).
- b) Stability category shall be determined using the following method from Fact Sheet D of the *Noise Policy for Industry* (NSW EPA, 2017);
  - i. Direct measurement of temperature lapse rate (section D1.2); or
  - ii. Use of sigma-theta data (section D1.4).

## L4.7 To assess compliance:



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a) with the LAeq(15 minute) or the LA1(1 minute) noise limits in condition L4.1, L4.2, L4.3 and L4.5, the noise measurement equipment must be located:

- (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to the premises; or where applicable,
- (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises, or, where applicable,
- (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve,
- (iv) at any other location identified in condition L4.

b) with the LAeq(15 minute) or the LA1 (1 minute) noise limits in condition L4.1, L4.2, L4.3 and L4.5, the noise measurement equipment must be located:

- (i) at the reasonably most affected point at a location where there is no residence at the location; or,
- (ii) at the reasonably most affected point within an area at a location prescribed by condition L4.7(a).

L4.8 A non-compliance of conditions L4.1, L4.2, L4.3 and L4.5 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L4.7(a) or L4.7(b).

Note: to L4.7 and L4.8: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.

L4.9 For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 on Fact Sheet C of the *Noise Policy for Industry* (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.

L4.10 Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.

## L5 Blasting

L5.1 Blasting in or on the premises must only be carried out between 9am and 5pm, Monday to Friday and 9am and 3pm, Saturday. Blasting in or on the premises must not take place on Sundays or Public Holidays without the prior approval of the EPA.

L5.2 The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.

L5.3 The airblast overpressure level from blasting operations in or on the premises must not exceed: 120 dB (Lin Peak) at any time; at either monitoring point 2 or 3 of this licence.

L5.4 The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed:





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5 mm/second for more than 5% of the total number of blasts during each reporting period;  
at either monitoring point 2 or 3 of this licence.

- L5.5 The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed:  
10 mm/second at any time;  
at either monitoring point 2 or 3 of this licence.
- L5.6 Error margins associated with any monitoring equipment used to measure blasts must not be taken into account when determining whether or not the limit has been exceeded.
- L5.7 Offensive blast fume must not be emitted from the premises.

*Definition:*

*Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances:*

- 1. *are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or*
- 2. *interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.*

## L6 Hours of operation

- L6.1 In accordance with development consent DA 231-10-99 MOD 5, hours of operation for the premises are specified in the table below:

Day	Extraction and processing operations	Transportation operations	Asphalt Plant & associated transport (campaigns)
Monday - Friday	6am to 10pm	6am to 10pm	24 hours a day
Saturday	6am to 6pm	6am to 10 pm	24 hours a day
Sunday and Public Holidays	None	None	24 hours a day

- L6.2 In accordance with development consent DA 231-10-99 MOD 5, the following activities may be conducted at the premises outside the hours specified in the table above:
  - (a) return of trucks to the premises prior to midnight Monday to Saturday;
  - (b) delivery or dispatch of materials as requested by Police, Fire Brigade or other similar authorities;
  - (c) emergency work to avoid the loss of lives, property and/or prevent environmental harm; and
  - (d) maintenance activities provided it is inaudible at residential premises.In circumstances outlines in (b) and (c), the Licensee shall notify affected residents prior to undertaking the activities, or as soon as practical thereafter



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## **L7 Potentially offensive odour**

- L7.1 The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.

## **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 The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.

### **O4 Emergency response**

Note: The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must be developed in accordance with the requirements in Part 5.7A of the POEO Act and Regulations.

The licensee must keep the PIRMP on the premises at all times. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with the activities that occur at the premises and which are likely to cause harm to the environment. The PIRMP must be tested at least annually or following a pollution incident.

### **O5 Processes and management**

- O5.1 The licensee must take all reasonable measures to prevent the tracking of mud and debris onto the Pacific Highway including, but not limited to, ensuring all vehicles leaving the premises pass through the vehicular wheel wash.





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## O6 Waste management

- O6.1 The licensee must comply with the conditions as specified in this licence or where no specific conditions outlined in this licence, this licensee must comply with the *Protection of the Environment Operations (Waste) Regulation 2014*.

## 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 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 Air Monitoring Requirements

POINT 11

Pollutant	Units of measure	Frequency	Sampling Method
PM10	micrograms per cubic metre	Continuous	Special Method 1

Note: Special Method 1 means sampling and analysis using the aeroqual Dust Sentry Pro particle monitor.

M2.3 Water and/ or Land Monitoring Requirements



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## POINT 1

Pollutant	Units of measure	Frequency	Sampling Method
pH	pH	Each overflow event	Grab sample
Total suspended solids	milligrams per litre	2 times daily during discharge	Grab sample
Turbidity	nephelometric turbidity units	2 times daily during discharge	Grab sample

### M3 Testing methods - concentration limits

- M3.1 Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:
- any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or
  - if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or
  - if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.

- M3.2 Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.

Note: The *Protection of the Environment Operations (Clean Air) Regulation 2010* requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".

### M4 Weather monitoring

- M4.1 At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.



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## POINT 4

Parameter	Sampling method	Units of measure	Averaging period	Frequency
Temperature at 10 metres	AM-4	degrees Celsius	1 hour	Continuous
Wind Direction at 10 metres	AM-2 & AM-4	Degrees	15 minutes	Continuous
Wind Speed	AM-2 & AM-4	metres per second	15 minutes	Continuous
Sigma Theta	AM-2 & AM-4	Degrees	15 minutes	Continuous
Rainfall	AM-4	millimetres	15 minutes	Continuous
Relative humidity	AM-4	percent	1 hour	Continuous

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

Note: The rainfall monitoring data collected in compliance with the above condition will assist in interpreting the effectiveness of stormwater management at the quarry.

## 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:

- the date and time of the complaint;
- the method by which the complaint was made;
- any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;
- the nature of the complaint;
- the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and
- 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.



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

## M7 Blasting

M7.1 To determine compliance with the blasting limits of this licence:

- a) Airblast overpressure and ground vibration levels must be measured and electronically recorded for monitoring points 2 and 3 for the parameters specified in Column 1 of the table below; and
- b) The licensee must use the units of measure, sampling method, and sample at the frequency specified opposite in the other columns.

Parameters	Units of Measure	Frequency	Sampling Method
Airblast Overpressure	Decibels (Linear Peak)	All blasts	Australian Standard AS 2187.2-2006
Ground Vibration Peak Particle Velocity	millimetres/second	All blasts	Australian Standard AS 2187.2-2006

## M8 Noise monitoring

M8.1 To assess compliance with the noise limits of this licence, attend noise monitoring must be undertaken in accordance with the conditions of this licence and:

- a) during a period of normal quarry operations;
- b) at each one of the noise monitoring locations listed in the noise limits table of this licence;
- c) occur once annually in the reporting period; and
- d) occur during the night period as defined in the NSW Noise Policy for Industry, and in conjunction with an asphalt campaign if any such campaign occurs within the quarterly monitoring period.

Note: The extent and frequency of noise monitoring required by this licence will be reviewed upon request after eight quarterly monitoring campaigns.

M8.2 Noise monitoring must be carried out in accordance with Australian Standard AS 2659.1 - 1998: Guide to the use of sound measuring equipment - Portable sound level metres and in accordance with any relevant factors provided in the NSW Noise Policy for Industry.

## 6 Reporting Conditions

### R1 Annual return documents

R1.1 The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:

1. a Statement of Compliance,
2. a Monitoring and Complaints Summary,
3. a Statement of Compliance - Licence Conditions,
4. a Statement of Compliance - Load based Fee,
5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan,





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- 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and
- 7. a Statement of Compliance - Environmental Management Systems and Practices.

At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.

R1.2 An Annual Return must be prepared in respect of each reporting period, except as provided below.

Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.

R1.3 Where this licence is transferred from the licensee to a new licensee:

- a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and
- b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.

Note: An application to transfer a licence must be made in the approved form for this purpose.

R1.4 Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on:

- a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or
- b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.

R1.5 The Annual Return for the reporting period must be supplied to the EPA via eConnect *EPA* or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').

R1.6 The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.

R1.7 Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by:

- a) the licence holder; or
- b) by a person approved in writing by the EPA to sign on behalf of the licence holder.

## R2 Notification of environmental harm

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.

R2.1 Notifications must be made by telephoning the Environment Line service on 131 555.

R2.2 The licensee must provide written details of the notification to the EPA within 7 days of the date on which the



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incident occurred.

## R3 Written report

- R3.1 Where an authorised officer of the EPA suspects on reasonable grounds that:
- a) where this licence applies to premises, an event has occurred at the premises; or
  - b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence,
- and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), the authorised officer may request a written report of the event.
- R3.2 The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.
- R3.3 The request may require a report which includes any or all of the following information:
- a) the cause, time and duration of the event;
  - b) the type, volume and concentration of every pollutant discharged as a result of the event;
  - c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event;
  - d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort;
  - e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;
  - f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and
  - g) any other relevant matters.
- R3.4 The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.

## R4 Other reporting conditions

### R4.1 Noise Compliance Assessment Report

A noise compliance assessment report(s) must be submitted to the EPA with each Annual Return. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include:

- a) an assessment of compliance with noise limits detailed in the limit conditions of this licence;
- b) details of all quarrying activities that were occurring during each of the periods of monitoring, and
- c) an outline of any management actions taken within the monitoring period to address any exceedences of the limits detailed in the limit conditions of this licence.

### R4.2 Blast Monitoring Report

The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return:

- a) the date and time of the blast;
- b) the location of the blast on the premises;
- c) the blast monitoring results at each blast monitoring station; and





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d) an explanation for any missing blast monitoring results.

R4.3 The licensee must report any exceedence of the licence blasting limits to the EPA's Environment Line as soon as practicable after the exceedence becomes known to the licensee or to one of the licensee's employees or agents.

## 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.

### G2 Other general conditions

#### G2.1 Completed Programs

Program	Description	Completed Date
PRP 1: Installation and Use of a Wheel Wash at the Premises	Contruction and Utilisation of a vehicular wheel wash for all vehicles exiting the premises.	28-October-2011



# Environment Protection Licence

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## Dictionary

### General Dictionary

<b>3DGM [in relation to a concentration limit]</b>	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
<b>Act</b>	Means the Protection of the Environment Operations Act 1997
<b>activity</b>	Means a scheduled or non-scheduled activity within the meaning of the Protection of the Environment Operations Act 1997
<b>actual load</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
<b>AM</b>	Together with a number, means an ambient air monitoring method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> .
<b>AMG</b>	Australian Map Grid
<b>anniversary date</b>	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.
<b>annual return</b>	Is defined in R1.1
<b>Approved Methods Publication</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
<b>assessable pollutants</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
<b>BOD</b>	Means biochemical oxygen demand
<b>CEM</b>	Together with a number, means a continuous emission monitoring method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> .
<b>COD</b>	Means chemical oxygen demand
<b>composite sample</b>	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.
<b>cond.</b>	Means conductivity
<b>environment</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>environment protection legislation</b>	Has the same meaning as in the Protection of the Environment Administration Act 1991
<b>EPA</b>	Means Environment Protection Authority of New South Wales.
<b>fee-based activity classification</b>	Means the numbered short descriptions in Schedule 1 of the Protection of the Environment Operations (General) Regulation 2009.
<b>general solid waste (non-putrescible)</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997



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<b>flow weighted composite sample</b>	Means a sample whose composites are sized in proportion to the flow at each composites time of collection.
<b>general solid waste (putrescible)</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>grab sample</b>	Means a single sample taken at a point at a single time
<b>hazardous waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>licensee</b>	Means the licence holder described at the front of this licence
<b>load calculation protocol</b>	Has the same meaning as in the Protection of the Environment Operations (General) Regulation 2009
<b>local authority</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>material harm</b>	Has the same meaning as in section 147 Protection of the Environment Operations Act 1997
<b>MBAS</b>	Means methylene blue active substances
<b>Minister</b>	Means the Minister administering the Protection of the Environment Operations Act 1997
<b>mobile plant</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>motor vehicle</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>O&amp;G</b>	Means oil and grease
<b>percentile [in relation to a concentration limit of a sample]</b>	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.
<b>plant</b>	Includes all plant within the meaning of the Protection of the Environment Operations Act 1997 as well as motor vehicles.
<b>pollution of waters [or water pollution]</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>premises</b>	Means the premises described in condition A2.1
<b>public authority</b>	Has the same meaning as in the Protection of the Environment Operations Act 1997
<b>regional office</b>	Means the relevant EPA office referred to in the Contacting the EPA document accompanying this licence
<b>reporting period</b>	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.
<b>restricted solid waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>scheduled activity</b>	Means an activity listed in Schedule 1 of the Protection of the Environment Operations Act 1997
<b>special waste</b>	Has the same meaning as in Part 3 of Schedule 1 of the Protection of the Environment Operations Act 1997
<b>TM</b>	Together with a number, means a test method of that number prescribed by the <i>Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales</i> .





# Environment Protection Licence

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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

Mr Nigel Sargent

Environment Protection Authority

(By Delegation)

Date of this edition: 10-March-2000





# Environment Protection Licence

Licence - 2796

End Notes	
1	Licence varied by notice 1006152, issued on 21-Feb-2002, which came into effect on 18-Mar-2002.
2	Licence varied by notice 1016675, issued on 20-Jun-2002, which came into effect on 15-Jul-2002.
3	Licence transferred through application 141653, approved on 19-Dec-2002, which came into effect on 01-Oct-2002.
4	Licence varied by notice 1042128, issued on 14-Jan-2005, which came into effect on 08-Feb-2005.
5	Condition A1.3 Not applicable varied by notice issued on <issue date> which came into effect on <effective date>
6	Licence varied by notice 1106247, issued on 08-Sep-2009, which came into effect on 08-Sep-2009.
7	Licence varied by notice 1503538 issued on 04-Jan-2012
8	Licence varied by notice 1507470 issued on 26-Sep-2012
9	Licence varied by notice 1535107 issued on 17-Oct-2016
10	Licence varied by notice 1577456 issued on 12-Jun-2019
11	Licence format updated on 18-Jul-2019
12	Licence varied by notice 1585343 issued on 06-Nov-2019
13	Licence varied by notice 1609049 issued on 27-Aug-2021



## Appendix 4 Independent audit declaration form


<b>Project name</b>	<b>Jandra Quarry</b>
<b>Consent</b>	DA 231-10-99 MOD 5
<b>Description of project</b>	Extractive Industries
<b>Site Address</b>	15284 Pacific Highway, Possum Bruch, NSW, 2430
<b>Proponent</b>	Holcim (Australia) Pty Ltd
<b>Date</b>	9 September 2025

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 2020).
- 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)

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







Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	2	1	Obligation to Minimise Harm to the Environment	In addition to meeting the specific criteria in this consent, the Applicant shall implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.	1.02, 1.01, 8.01, 8.02, 8.03	On review of the documentation set out in the evidence file, and based on the auditor's observations on Site, the audit team is satisfied the Site is operated in an environmentally responsible manner and the Proponent is implementing reasonable and feasible measures to minimise harm to the environment. Note the listed evidence file references are not exhaustive for this broad compliance requirement.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	2	Terms of Consent	The Applicant shall carry out the development generally in accordance with the (a) previous approvals; (b) EA (Mod 5); and (c) conditions of this consent. <b>Note:</b> The general layout and stages of the development are shown on the plans in Appendix 1.	1.02, 1.01, 8.01, 8.02, 8.03	On review of the documentation set out in the evidence file, and based on the auditor's observations on Site, the audit team is satisfied the Site is operated generally in accordance with the EA and conditions of consent, despite some non-compliance with specific conditions. Note the listed evidence file references are not exhaustive for this broad compliance requirement.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	3	Terms of Consent	If there is any inconsistency between the documents identified in condition 2, the more recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail over all other documents to the extent of any inconsistency.	1.02	No inconsistencies have been identified in this audit.	Not triggered	NA	NA
DA 231-10-99 MOD 5	2	4	Terms of Consent	The Applicant shall comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent; (b) any reviews, reports or audits, commissioned by the Department regarding compliance with this consent; and (c) the implementation of any actions or measures contained in these documents.	1.02, 13.04, 8.02	EPA site inspection 7 April 2025 - checking PIRMP process - no follow up. 16 March 2022 and earlier. Department of planning last inspection 16 April 2024. Correspondence and requests from DPHI - requested that the implementation of the 2022 IEA be reported on in the following AEMR - this request was complied with in 2023 AEMR.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	5	Limits on Consent	The Applicant may carry out quarrying operations on the site until 31 March 2045. <b>Note:</b> Under this consent, the Applicant is required to rehabilitate the site and carry out additional undertakings to the satisfaction of the Secretary. Consequently, this consent will continue to apply in all other respects other than the right to conduct quarrying operations until the rehabilitation of the site and those undertakings have been carried out to a satisfactory standard.	1.01, 1.02	The deadline has not been triggered in this audit period.	Not triggered	NA	NA
DA 231-10-99 MOD 5	2	6	Limits on Consent	The Applicant shall not carry out quarrying operations below a level of RL 20 m AHD.	1.02, 2.03	Current quarry floor is RL 50. Blast plans etc reviewed. RL21 at floor of western pit - observed in propellar. Discussed with Proponent what is done proactively to avoid non-compliance with this condition - including ensuring the drill and charge depths by Orica are correct on blasting plans etc (all done through BlastIQ). Processes to avoid non compliance are robust.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	7	Limits on Consent	The Applicant shall not extract more than 16.5 million tonnes of quarry products from the site under this consent.	7.03	Section 4.4 of the 2024 Annual Review states that from the start of 2015 to the end of 2024, the site has extracted approximately 2,574,082 tonnes. This is well within the limits. This has been cross checked with previous audits and is also within the expected range based on the cubic m of extracted material from the quarry void in the life of the project.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	8	Limits on Consent	The Applicant shall not extract more than 490,000 tonnes of quarry products from the site in any calendar year.	8.01, 8.02, 8.03, 8.04	Based on YIELD. Section 4.4 of the 2024 Annual Review notes the total volume of material extracted in each calendar year as follows: 2022 - 465,466 t. 2023 - 461,521 t. 2024 - 417,269 t. 2025 YTD - 208,713 This has been cross-checked with yield tracking data.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	2	9	Limits on Consent	The Applicant shall not transport more than 475,000 tonnes of quarry products from the site in any calendar year.	3.01, 3.02, 3.03, 3.07	Based on TRANSPORT Truck movement summaries reviewed for data during the audit period. Total volume of material transported in each calendar year as follows: 2022 - 440,987 t. (Annual Review says 415,433 t). <b>440,987 Confirmed.</b> 2023 - 412,909 t. 2024 - 380,550 t. Confirm 2025 YTD: Approx 180,199	Compliant	Lodge a correction or addendum to the 2022 AEMR to correct the transported material figure.	NA
DA 231-10-99 MOD 5	2	10	Hours of Operation	The Applicant shall comply with the operating hours in Table 1. See table >> The following activities may be carried out on the site outside the hours specified in Table 1. (a) return of trucks to the site prior to 12 midnight Monday to Saturday; (b) delivery or dispatch of materials as requested by Police, Fire Brigade or other similar authorities; and (c) emergency work to avoid the loss of lives, property and/or to prevent environmental harm. In circumstances outlined in (b) and (c), the Applicant shall notify the Secretary and affected residents prior to undertaking the activities, or as soon as is practical thereafter.	1.02, 8.01, 8.02, 8.03	s4.4. of ARs 2022 Annual Review - "Site has not operated outside the hours of 7am and 6pm". 2023 Annual Review - "Site does not operate outside the hours of 7am and 6pm". 2024 - no detail regarding compliance with hours 2025 - 6am to 6pm. But restrictions before 7am on RL 50 and above. Operating hours were discussed in the Site interview. Staff noted that there had been an issue in the previous audit period regarding operation of mobile plant in the morning shoulder period, but this learning had been taken on board and that activity no longer occurred. The asphalt plant activity was ceased.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	11	Structural Adequacy	The Applicant shall ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.	1.02, 2.01, 2.02, 2.03	Interview with Site management and review of aerial images does not indicate any building works or new structures during the audit period.	Not triggered	NA	NA
DA 231-10-99 MOD 5	2	12	Demolition	The Applicant shall ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	2.01, 2.02, 2.03, 14.06, 1.01, 1.02	The audit team has sighted the SWMS provided by the contractor engaged to remove the mobile asphalt plant. The SWMS confirms compliance with the AS and is considered to be of a suitable level of detail and quality. Further lines of evidence include anecdotal evidence by site management and the audit team's observations of the state the asphalt plant footprint has been left (i.e. no staining or structures remaining, effectively returned to pre-lease condition)	Compliant	NA	NA
DA 231-10-99 MOD 5	2	13	Protection of Public Infrastructure	The Applicant shall: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <b>Note:</b> This condition does not apply to damage to roads caused as a result of general road usage.	1.02, 1.01	No damage to public infrastructure has been identified through site inspection observations, interview, correspondence review, complaints etc.	Not triggered	NA	NA
DA 231-10-99 MOD 5	2	14	Operation of Plant and Equipment	The Applicant shall ensure that all the plant and equipment used at the site is maintained and operated in a proper and efficient manner.	1.01, 1.02	Plant and equipment was observed to be operating effectively on the day of the audit inspections. No breakdowns, noisy plant or other issues were observed. Site Management explained in detail the maintenance planning process and provided documents to illustrate the robust system for maintenance management at the Site. The audit team has not identified any evidence that would suggest plant it not being maintained to the required standard.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	15	Staged Submission of any Strategy, Plan or Program	With the approval of the Secretary, the Applicant may: (a) submit any strategy, plan or program required by this consent on a progressive basis; and (b) combine any strategy, plan or program required by this consent with any similar strategy, plan or program required for the development. <del>To ensure these strategies, plans or programs are updated on a</del>	1.02	No plans have been prepared on a staged or progressive basis.	Not triggered	NA	NA
DA 231-10-99 MOD 5	2	16	Identification of Approved Limits of Extraction	Prior to 31 August 2015, the Applicant shall: (a) engage a registered surveyor to mark out the boundaries of the approved area of extraction and the boundaries of the approved infrastructure area; and (b) submit a survey plan of these boundaries to the Secretary.	1.02, 13.01	Not triggered in 2025 audit period. 2022 IEA considered it compliant as it had been previously addressed. However it was submitted late, and therefore was an "administrative non-compliance" in the 2015 IEA.	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	2	17	Identification of Approved Limits of Extraction	The Applicant shall ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify the location of these boundaries and that quarrying operations are contained within the approved areas.	1.01, 1.02, 2.03	Physical markers and the use of propeller system in planning etc. observed by audit team.	Compliant	NA	NA
DA 231-10-99 MOD 5	2	18	Production Data	The Applicant shall provide annual quarry production data to DRE using the standard form for that purpose; and report these data in the Annual Review (see condition 4 of Schedule 5).	8.04, 3.09	Evidence of submission to DRE / Resources Regulator was sighted on a central (corporate) spreadsheet (2025 - ticket number ROY000885). Spreadsheet for internal tracking of submissions etc. sighted. Production data (extracted total) is presented in the Annual Reviews: 2022 (calendar year) - 465,466 t. 2022-23 (financial year) - 419,158.1 t. 2023-24 (financial year) - 443,485 t.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	1	NOISE - Noise Criteria	<p>The Applicant shall ensure that the noise generated by the development does not exceed the criteria in Table 2 or Table 3 at any residence on privately-owned land.</p> <p><b>Notes:</b></p> <ul style="list-style-type: none"> <li>Receiver locations are shown on the figure in Appendix 2.</li> <li>Condition 10 of Schedule 2 prohibits quarrying operations during the hours 10 pm - 6 am.</li> </ul> <p>Noise generated by the development is to be measured in accordance with the relevant requirements of the NSW Industrial Noise Policy (as may be updated from time-to-time). Appendix 3 details the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria.</p> <p>However, these criteria do not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05, 13.02	<p>Holcim have a negotiated agreement with the property owner of R1, excluding this receptor from the approved noise criteria. Receivers R8, R9 and R10 are Holcim-owned, also excluded from approved criteria. Evidence of advising DPE was provided in the 2019 IEA.</p> <p>Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period. Site management also discussed corrective action taken following a noise exceedance in the previous audit period.</p> <p>The available lines of evidence suggest the Site has met these criteria.</p>	Compliant	NA	NA
DA 231-10-99 MOD 5	3	2	NOISE - Additional Noise Mitigation Upon Request	<p>Upon receiving a written request from the owner of any residence on property R1 the Applicant shall implement additional noise mitigation measures (such as double glazing, insulation, or air conditioning) at the residence in consultation with the owner. These measures must be reasonable and feasible and directed towards reducing the noise impacts of the project on the residence.</p> <p>If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.</p> <p>However, the obligation to implement noise mitigation measures does not apply if the Applicant has a negotiated agreement with the owner/s of the relevant residence or land that sets aside noise mitigation measures under the terms of this consent, and the Applicant has advised the Department in writing of the terms of this agreement.</p>	1.02	No correspondence or complaints from R1.	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	3	NOISE - Operating Conditions	The Applicant shall: (a) implement best practice management to minimise the construction, operational and transportation noise of the development; (b) minimise the noise impacts of the development during meteorological conditions when the noise limits in this consent do not apply (see Appendix 3); (c) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent; and (d) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Secretary.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period. Site management also discussed corrective action taken following a noise exceedance in the previous period. The available lines of evidence suggest the Site has met these criteria.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	4	NOISE - Noise Management Plan	The Applicant shall prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval by 31 August 2015; (b) describe the measures that would be implemented to ensure: • compliance with the noise criteria in this consent; • best management noise minimisation practice is employed on site; • noise emissions from trucks on the site after 10 pm do not annoy neighbouring residents; and • the noise impacts of the development are minimised during any meteorological conditions when the noise limits in this consent do not apply; and (c) detail a monitoring program that will be put in place to measure noise from the development against the noise criteria in Table 2 and 3, and which: • includes quarterly attended monitoring for the first two years of each of the three Stages of the development, as shown in the three figures in Appendix 1 (this monitoring must take place within a 24 hour asphalt campaign, if any such campaign is conducted during the quarter), and thereafter annually unless the Secretary agrees otherwise; and • evaluates and reports on the effectiveness of the noise management system on site.	10.01	Noise and Blast Management Plan rev D (20/08/2018) is in force. No record of submission, however acceptance by the Department has been sighted. No longer able to access R2. RFQ underway and ready to resubmit by 11/7/2025. Management plans reviewed following the 2022 and 2023 annual reviews. Letter submitted following review and no updates required.  Management plan currently requires annual routine monitoring, with ad hoc monitoring if asphalt production re-commences. We note that Appendix 3 states quarterly monitoring is required unless agreed by the Planning Secretary. The audit team considers that approval of the NMP with an annual monitoring requirement is equivalent to Secretary agreement to annual monitoring and therefore Appendix 3 is complied with under the existing noise monitoring program.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	5	BLASTING - Blasting Impact Assessment Criteria	The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 4. However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 4, and the Applicant has advised the Department in writing of the terms of this agreement.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal.  Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation sequence and/or offset delay being too small.  Exceedance on 28 April 2023 of 6.1 mm/sec at R2 (reported to EPA and DPHI). On 10 May 2023 Holcim provided an additional Blast Exceedance Result Report to the Department as per Schedule 5 Condition 6 of the development consent. The finding of this report determined that the use of soil spikes likely lead to unreliable results. This result was then excluded from maximum values going forward.  No exceedances from 2024 and 2025. DPHI issued an official caution in March 2025 for failure to report the exceedances in 2023.	Non-compliant	NA	Continue monitoring blasts and follow blasting contractor recommendations for location of blast holes and sequence timing. Continue monitoring and if further exceedances occur, consider the need to modify blasting methodology.



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	6	BLASTING - Blasting Hours	The Applicant shall only carry out blasting on site between 9 am and 5 pm Monday to Friday and 9 am to 3 pm Saturday. No blasting is allowed on Sundays or public holidays, or at any other time without the written approval of the Secretary	7.03, 7.04	Blast records indicate that all blasts were carried out within the approved hours.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	7	BLASTING - Blasting Frequency	The Applicant may carry out a maximum of 2 blasts per month on site. This condition does not apply to blasts required to ensure the safety of the quarry or workers on site. <b>Note:</b> For the purposes of this condition a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the quarry.	7.01, 7.02, 7.03	2022-24 Annual Reviews reviewed. No months recorded more than two blasts. Also confirmed for 2025	Compliant	NA	NA
DA 231-10-99 MOD 5	3	8	BLASTING - Operating Conditions	The Applicant shall: (a) implement best management practice to: • protect the safety of people and livestock in the areas surrounding blasting operations, • protect public or private infrastructure/property in the surrounding area from damage from blasting operations; • protect the Pacific Highway from flyrock from blasting operations; and • minimise the dust and fume emissions of any blasting; (b) operate a suitable system to enable the public to get up to-date information on the proposed blasting schedule on site; and (c) carry out regular monitoring to determine whether the development is complying with the relevant conditions of this consent, to the satisfaction of the Secretary.	7.03, 7.04, 9.01, 9.02, 9.03, 9.04, 10.01, 1.02	a) Discussion during the Site interview and review of blast documentation supports compliance with this requirement. b) Section 5.2 of NMBP notes the process as weighbridge staff or their delegates sending a text message to sensitive receivers near the quarry the day before a planned blast is to be undertaken. Sighted records from P Wilson. c) Blast records observed for 2024 and 2025 for every blast conducted.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	9	BLASTING - Blast Management Plan	The Applicant shall prepare and implement a Blast Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval by 31 August 2015; (b) describe the measures that would be implemented to ensure compliance with the blast criteria and operating conditions of this consent; (c) include a monitoring program for evaluating and reporting on compliance with the blasting criteria in this consent; (d) include a blast fume management protocol to demonstrate how emissions will be minimised including risk management strategies if blast fumes are generated; (e) include public notification procedures on the blasting schedule; and (f) include a protocol for investigating and responding to complaints.	7.03, 7.04, 9.01, 9.02, 9.03, 9.04, 10.01, 1.02	Activities are operated in accordance with the Noise and Blast Management Plan (NMBP) rev D (20/08/2018). a) Final Draft of the NMBP was "Approved for Issue" on 31/08/2015. Submission and approval by the department confirmed in previous IEA. b) Section 5.2 of the NMBP includes measures to ensure compliance - operating hours, detailed blast designs, exclusion zones, blast monitoring, video recording. c) Section 6 of the NMBP includes monitoring programs. d) Section 5.3 of the NMBP includes the blast fume management protocol. e) Section 5.2 of NMBP notes the process as weighbridge staff or their delegates sending a text message to sensitive receivers near the quarry the day before a planned blast is to be undertaken. Evidence sighted during interview. f) Section 7.2 of the NMBP includes the protocol for investigating and responding to complaints.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	10	AIR QUALITY - Air Quality Impact Assessment Criteria	<p>The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria listed in Tables 5, 6 and 7 at any residence on privately-owned land.</p> <p><b>Notes for Tables 5 to 7:</b></p> <p>a. Total impact (ie incremental increase in concentrations due to the development plus background concentrations due to all other sources);</p> <p>b. Incremental impact (ie incremental increase in concentrations due to the development on its own);</p> <p>c. Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580 10 1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method; and</p> <p>d. Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents, illegal activities or any other activity agreed to by the Secretary in consultation with the EPA.</p>	8.01, 8.02, 8.03, 1.01, 7.03	<p>Mitigation measures implemented as noted in the 2022-2024 Annual Reviews include the following:</p> <ul style="list-style-type: none"> <li>- Use of a watercart following specified procedures</li> <li>- Use of installed sprinkler systems along primary haul road</li> <li>- Sprays throughout the plant</li> <li>- Speed limits across the site</li> <li>- Dust covers in place across the screening building</li> <li>- Daily inspections</li> <li>- Monitoring for air quality and meteorological conditions</li> <li>- Training of staff and contractors</li> </ul> <p>Particulate matter emissions monitoring results showed that criteria for both PM10 and TSP were complied with throughout the audit period for both short-term and long-term criteria.</p> <p>2025 data also compliant.</p> <p>Non compliance in 2024 for conduct of monitoring reported elsewhere - not considered to be an 'exceedance' of criteria rather a failure to implement air monitoring as required.</p>	Compliant	NA	NA
DA 231-10-99 MOD 5	3	11	AIR QUALITY - Odour	The Applicant shall not cause or permit the emission of offensive odour beyond the boundaries of the site.	1.01, 1.02, 9	No odours observed on site during the audit. No odour complaints over the last three years. Downer batching plant not operational during the audit period.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	12	AIR QUALITY - Operating Conditions	<p>The Applicant shall:</p> <p>(a) implement best practice management to minimise the odour and dust emissions of the development;</p> <p>(b) carry out regular air quality monitoring to determine whether the development is complying with the relevant conditions of this consent;</p> <p>(c) regularly assess air quality monitoring data and relocate, modify and/or stop operations on site to ensure compliance with the air quality criteria in this consent;</p> <p>(d) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see note d under Table 7); and</p> <p>(e) minimise the area of surface disturbance and maximise progressive rehabilitation of the site, to the satisfaction of the Secretary.</p>	1.01, 1.02, 9, 8.01, 8.02, 8.03, 7.03	<p>Dust suppression measures were found to be in place and functioning effectively. These included the deployment of water carts along haul routes, the use of chemical suppressants during material processing, and the installation of physical barriers on crushing and sorting equipment. No off-site dust emissions were detected, and no complaints related to dust were recorded during the review period.</p> <p>Odour management was also assessed as satisfactory. No odours were identified during site inspections, and no odour-related complaints were received.</p> <p>Air quality monitoring is conducted routinely, covering both PM10 concentrations and depositional dust levels. The Quarry Manager oversees the review of monitoring data, and both the manager and site staff conduct ongoing visual assessments of air quality. Operational adjustments are made as needed, including the use of water trucks to mitigate visible dust emissions.</p> <p>Evidence of progressive rehabilitation was observed. Specific areas such as pit benches, the upper boundary of the site, and the lower sections of spoil stockpiles have undergone rehabilitation. Weed control measures are actively being implemented.</p> <p>No extraordinary events were reported during the audit timeframe.</p>	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	13	AIR QUALITY - Quarry-owned Land	The Applicant shall ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Tables 5, 6, and 7 at any occupied residence on quarry-owned land unless: (a) the tenant has been notified of any health risks associated with such exceedances in accordance with the notification requirements under Schedule 4 of this consent; (b) the tenant of any land owned by the Applicant can terminate their tenancy agreement without penalty at any time, subject to giving reasonable notice; (c) air quality monitoring is regularly undertaken to inform the tenant of the actual particulate emissions at the residence; and (d) data from this monitoring is presented to the tenant in an appropriate format for a medical practitioner to assist the tenant in making informed decisions on health risks associated with occupying the property, to the satisfaction of the Secretary.	1.01, 1.02	No residences on quarry land are occupied.	Not triggered	NA	NA
DA 231-10-99 MOD 5	3	14	AIR QUALITY - Air Quality Management Plan	The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval by 31 August 2015; (b) describe the measures that would be implemented to ensure: • compliance with the relevant conditions of this consent; • best practice management is employed; and • the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events; (c) describe the proposed air quality management system; and (d) include an air quality monitoring program that: • is capable of evaluating the performance of the development; • includes a protocol for determining any exceedances of the relevant conditions of consent; • effectively supports the air quality management system; and • evaluates and reports on the adequacy of the air quality management system.	8.01, 8.02, 8.03, 7.09, 10.08	Activities are operated in accordance with the Air Quality Management Plan (AQMP) Version 2 (November 2021). Submission date outside of this audit period and Departmental approval of the AQMP has been sighted dated 1 March 2022. Section 15 of the AQMP notes that Version 1 was updated in October 2016 for the Mod 5 Modification. a) 2016 IEA marks as compliant "Sighted letter of submission to the Secretary of DP&E dated 31 August 2015". DPE approved Version 2 of the AQMP in 1/3/2022. b) Sections 3 and 7 describe the measures to be implemented. c) Section 9 details the procedures for evaluating the results, notifying exceedances, external reporting etc. Section 10 and Table 13 detail the actions to be taken dependent on monitoring results. d) The air quality monitoring program is detailed in Section 8, with locations shown in Figure 1.  Implementation not fully complied with due to monitoring gap due to equipment failure in data 2024. Self-reported non-compliance. This was reported in late 2024 once the failure and inability to obtain data had crystallised. As the continuous air quality nephelometer is the only monitoring device for PM10 and TSP, for a 2 month period, the Site was not able to effectively evaluate the performance of the development or determine whether exceedances occurred.  The audit team is advised that the Department has indicated their preference for data to be presented on a 6 day rolling basis rather than daily average 24 hour measurements. Hence the audit team accepts the presentation of data in the Site monitoring summary.	Non-compliant	NA	The Proponent must implement a procedure whereby any breakdown or failure of the continuous monitoring device is checked on a weekly basis at a minimum. A contingency must be in place so that any equipment breakdown can be rectified, either with a replacement monitoring device or similar action.
DA 231-10-99 MOD 5	3	15	AIR QUALITY - Meteorological Monitoring	For the life of the development, the Applicant shall ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in The Approved Methods for Sampling of Air Pollutants in New South Wales guideline.	1.01, 1.02, 7.08	Section 8.4 of the AQMP notes that Holcim have installed a weather station at the dam within the Jandra Quarry, to be operated for the life of the development. A summary of meteorological monitoring results is presented in the Annual Reviews. Confirm on site observations. Located on Office block on the roof. Observed by audit team and output station observed operational. Except of data output also obtained.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	16	AIR QUALITY - Greenhouse Gas Emissions	The Applicant shall implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.	1.01, 1.02, 14.07	2022 IEA: Compliant - "A new, more efficient crusher has been installed in 2021. All waste products on site are reused as saleable products from general fill to quarried rock. Routine maintenance and overhaul of machinery is carried out as required."  Corporate measures for NGERS and GHS reduction exist and are managed through Holcim Head Office. The Site recently updated mobile plant several in last few years. Ad blue on new machines (4 machines). High efficiency diesel used on Site	Compliant	NA	NA
DA 231-10-99 MOD 5	3	17	SOIL AND WATER - Water Supply	The Applicant shall ensure it has sufficient water for all stages of the development, and if necessary, adjust the scale of quarrying operations to match the available water supply.	1.01, 1.02, 2.02, 2.04	2022 IEA: Compliant - "Water supply is sourced from rainfall in the quarry area of operations. 40ML of storage is available on site."  Approximately 40 ML of storage still exists in the bottom dam/quarry sump (likely to be a conservative estimate). The top dam discharges occasionally during wet weather, as this catchment can periodically overtop the dam and storage in the bottom pit can be at capacity.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	18	SOIL AND WATER - Surface Water Discharges	The Applicant shall ensure that all surface water discharges from the site comply with the discharge limits in any EPL which regulates water discharges from the site, or with section 120 of the POEO Act.	1.01, 1.02, 2.04, 8.01, 8.02, 8.03, 7.06	Section 7.3 of the 2022-2024 Annual Reviews discuss surface water discharges from the site. 2022 - No discharges. 2023 - No discharges. 2024 - Two discharges, in September and October 2024. Water was within the concentration limits specified in Condition L2.4 of the EPL. 2025 - 11 days of discharge identified in YTD records. All monitoring parameters were compliant	Compliant	NA	NA
DA 231-10-99 MOD 5	3	19	SOIL AND WATER - Soil and Water Management Plan	The Applicant shall prepare and implement a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with the Council and NOW, by suitably qualified and experience person/s whose appointment has been approved by the Secretary, and be submitted to the Secretary for approval by 31 August 2015. In addition to the standard requirements for management plans (see condition 3 of Schedule 5) this plan must include a: (a) Site Water Balance that: • includes details of: o sources and security of water supply, including contingency planning to ensure demand will be met under all climatic conditions; o the site water storage capacity and licensing requirements for all stages of the development, o water use and management on site; and (b) Surface Water Management Plan that includes: • a detailed description of the surface water management system for the development, including the: o clean water diversion system; o erosion and sediment controls; and o the water storages required for each stage of the development; • identification of all reasonable and feasible measures to improve the quality of surface water on the site, particularly those measures required to improve the water quality in the main dam, and a timeframe for the implementation of any identified improvements; • the measures that would be implemented to minimise water use on site; • surface water impact assessment criteria	13.02, 13.03, 10.06, 7.06	Audit reference materials made publicly available did not display author or document approval markings; however, such approvals and the Department's approval of this Management Plan were verified during prior Independent Environmental Audits.  Section 6 of the Site Water Management Plan (SWMP) provides a thorough analysis of water supply sources, site consumption patterns, storage infrastructure, operational water use, management procedures, and environmental water loss.  The 2019 and 2022 IEAs found the Management Plan to be non-compliant with the requirement to include a 'plan to respond to any exceedances of the performance criteria and mitigate adverse surface water impacts of the development'.  The Management Plan has not been updated since the 2022 IEA. However, the audit team refers to Table 8 of the plan, which notes flocculant is to be added following any exceedance of the TSS criterion. The audit team does consider this to be a response to exceedance, as required by the Condition, although there is an opportunity to expand this to other pollutants. The Plan does not explicitly discuss how to respond to downstream impacts in the event of a release of water outside of criteria. Further supporting the decision to find this condition compliant, the audit team notes that the Department's approval of this Management Plan could be taken as endorsement that the Proponent has met these requirements in preparing the plan.	Compliant	The Proponent may choose to implement one of the following options, presented in this audit team's suggested order of likelihood to achieve future compliance with this condition. 1. Revise the Soil and Water Management Plan. 2. Prepare an addendum to the management plan, and submit to the Department for approval 3. Include a sediment-laden water overflow action plan in the PIRMP.	NA
DA 231-10-99 MOD 5	3	20	SOIL AND WATER - On-Site Sewage Management	The Applicant shall manage on-site sewage to the satisfaction of Council and the EPA.	1.01, 1.02	On site septic serviced quarterly. Records on hand and sighted. Irrigation area - Hold point 3 sign and drains to the west.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	21	BIODIVERSITY AND REHABILITATION - Biodiversity and Rehabilitation Objectives	The Applicant shall implement a biodiversity offset strategy and rehabilitate the site to the satisfaction of the Secretary, in accordance with the rehabilitation strategy in the documents listed in condition 2 of Schedule 2 and the objectives in Table 8.	10.04, 1.01, 1.02, 8.01, 8.02, 8.03	The BRMP includes the specified objectives as objectives of rehabilitation works on site. Site observations and review of quarterly biodiversity monitoring reports by Kleinfelder indicate general compliance with these requirements. Upper benches have established trees present. A Weed Management Plan is in place at Jandra Quarry to manage exotic species at the site and weeds were observed to be infrequent.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	22	BIODIVERSITY AND REHABILITATION - Progressive Rehabilitation	The Applicant shall rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilisation measures must be implemented where reasonable and feasible to control dust emissions in disturbed areas that are not active and which are not ready for final rehabilitation. <b>Note:</b> It is accepted that parts of the site that are progressively rehabilitated may be subject to disturbance in the future.	10.04, 1.01, 1.02, 8.01, 8.02, 8.03	Ongoing rehabilitation activities were observed across the site. Works have been completed on pit bench areas, the upper boundary zone, and the lower sections of the spoil stockpile area. Weed management is actively being carried out, noting there are some parts of the Site where weeds are established but difficult to control due to access and safety concerns.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	23	BIODIVERSITY AND REHABILITATION - Biodiversity Offset Strategy	By 31 March 2016, the Applicant shall implement a strategy to offset the impacts of clearing 1.28 ha of Small-fruited Grey Gum - Tallowwood shrubby open forest on coastal foothills of the southern North Coast vegetation community by either: (a) entering into a Biobanking agreement under the Threatened Species Conservation Act 1995 to retire at least the number of Ecosystem Credits assessed using the Biobanking Credit Calculator; or (b) implementing a strategy to provide a Biodiversity Offset Area of at least 7 ha of Small-fruited Grey Gum - Tallowwood shrubby open forest on coastal foothills of the southern North Coast vegetation community, in consultation with OEH and to the satisfaction of the Secretary.	13.03	Per the 2022 IEA - As reported in the 2016 and 2019 IEAs, correspondence between Holcim and DPIE confirming DPIE's acceptance of a section 88b Covenant being implemented has been previously sighted. As specified in Section 8.1 of the 2021 AR, instruments for protection of the Offset Area were secured in 2020. Holcim have elected to offset impacts through the selection of 23 (b).	Not triggered	NA	NA
DA 231-10-99 MOD 5	3	24	BIODIVERSITY AND REHABILITATION - Long Term Security of Offset	By 30 September 2016, the Applicant shall make suitable arrangements to protect in perpetuity any Biodiversity Offset Area established under condition 23 above to the satisfaction of the Secretary. <b>Note:</b> For the purposes of this consent, suitable arrangements may include the use of Public Positive Covenants in combination with Restrictions on Use of Land on the land title/s of the Biodiversity Offset Area. Other arrangements such as the use of Biobanking Agreements or transfer of lands to the national parks estate would also be considered for their suitability.	13.03	Per the 2022 IEA - As specified in Section 8.1 of the 2021 AR, instruments for protection of the Offset Area were secured in 2020.	Not triggered	NA	NA
				The Applicant shall prepare and implement a Biodiversity and Rehabilitation Management Plan for the site to the satisfaction of the Secretary. This plan must: (a) be prepared by suitably qualified person(s) whose appointment has been approved by the Secretary; (b) be prepared in consultation with OEH and Council, and submitted to the Secretary for approval by 31 August 2015; (c) describe the short, medium and long-term measures that would be implemented to: • manage the native vegetation and fauna habitat on the site; • implement the biodiversity offset strategy; and • ensure compliance with the biodiversity and rehabilitation objectives in Table 8, and progressive rehabilitation obligations in this consent; (d) include detailed performance and completion criteria for evaluating the performance of the biodiversity offset strategy		Activities are operated in accordance with the Biodiversity and Rehabilitation Management Plan (BRMP) V5 (20/08/2018). a) Appendix 1 includes the Secretary's approval of the proposed author(s). b) Consultation was undertaken, as noted in Section 2.3. The BRMP was not submitted by 31 August 2015. - Consultation was undertaken Dec 2015, so can't have been submitted by the due date? c) Table 4.1 and Section 5 describe the measures to be implemented in the short, medium and long-term. d) Sections 4.2 and 4.3 include detailed performance and completion criteria for evaluating performance, with supporting monitoring presented in Section 6.2, and triggers for action included in Section 7.	Compliant		



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	25	BIODIVERSITY AND REHABILITATION - Biodiversity and Rehabilitation Management Plan	<p>(e) include a detailed description of the measures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• minimise impacts on threatened species, populations and habitats as a result of the quarrying activities on the site;</li> <li>• enhance the quality of native vegetation and fauna habitat across the site and in the biodiversity offset area;</li> <li>• landscape the site to minimise visual and lighting impacts;</li> <li>• minimise the impact of clearing on native fauna;</li> <li>• maximise the salvage of environmental resources from any area approved to be cleared -including tree hollows, vegetative and soil resources - for beneficial reuse;</li> <li>• provide two nest boxes for each tree-hollow destroyed by vegetation clearing;</li> <li>• control weeds and feral pests;</li> <li>• control erosion;</li> <li>• control access, and</li> <li>• bushfire management;</li> </ul> <p>(f) include a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria;</p> <p>(g) identify the potential risks to rehabilitation of the site and the implementation of the biodiversity offset strategy, and include a description of the contingency measures that would be implemented to mitigate these risks; and</p> <p>(h) include details of who would be responsible for monitoring, reviewing, and implementing the plan.</p>	10.04, 1.01, 1.02, 8.01, 8.02, 8.03, 3.06	<p>e) Section 5 addresses the listed measures.</p> <p>f) Section 6 includes a detailed monitoring program with regard to the measures listed in 3(25)(e).</p> <p>g) Sections 7.1 and 7.2 present the risk assessment for identified risks and the corrective actions to be implemented to mitigate these risks.</p> <p>h) Table 10.1 presents the roles and responsibilities for key staff related to BRMP activities.</p> <p>Stripping (topsoil and overburden) activities took place in the eastern side of the pit in early 2024. A permit for these activities was sighted, confirming log salvage and other controls per the management plan.</p>	As above	NA	NA
DA 231-10-99 MOD 5	3	26	BIODIVERSITY AND REHABILITATION - Habitat for Threatened Fauna Species	The Applicant shall ensure that the Biodiversity Offset Area provides suitable habitat for all threatened fauna species that have potential habitat within the 1 .28 ha of land proposed to be cleared under EA (Mod 5).	8.01, 8.02, 8.03	Nominated Biodiversity Offset area described in the BRMP and covered by the Sect 888 Covenant has not been subject to grazing or clearing. Offset monitoring. Biodiversity monitoring every quarter by Klienfelder. Recovery from the impacts of the 2019 bushfires is progressing well and has been assisted by good rainfall conditions in recent years.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	27	BIODIVERSITY AND REHABILITATION - Rehabilitation and Conservation Bond	<p>Within 12 months of the approval of the Biodiversity and Rehabilitation Management Plan, the Applicant shall lodge a Rehabilitation and Conservation Bond with the Department to ensure that the biodiversity offset strategy and the rehabilitation of the site is implemented in accordance with the performance and completion Criteria set out in the Biodiversity and Rehabilitation Management Plan. The sum of the bond shall be determined by:</p> <p>(a) calculating the cost of implementing the biodiversity offset strategy and rehabilitating the site, and</p> <p>(b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary.</p> <p><b>Note:</b> If the rehabilitation of the site and the implementation of the biodiversity offset strategy is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site and the implementation of the biodiversity strategy is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.</p>	13.03	<p>2022 IEA: Non-compliant - "Payment of the Rehabilitation and Conservation Bond was due in August 2019 however was not paid until 1/06/2020. The 2019 IEA identified this as a non-compliance and after discussions with DPE, the bond payment was made by Holcim. The DPE approval letter includes approval of suitably qualified experts to undertake the cost calculation. This will remain as a non-compliance as it relates to initial timing of bond payment."</p> <p>Considered Not Triggered in this audit period. There is a bond in place.</p>	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	28	BIODIVERSITY AND REHABILITATION - Rehabilitation and Conservation Bond	Within 3 months of each Independent Environmental Audit (see condition 8 of Schedule 5), the Applicant shall review, and if necessary revise, the sum of the Rehabilitation and Conservation Bond to the satisfaction of the Secretary. This review must consider the: (a) effects of inflation; (b) likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development) and implementing the biodiversity offset strategy; and (c) performance of the implementation of the rehabilitation of the site and the biodiversity offset strategy to date.	13.03, 5.01	The 2022 IEA was submitted on 27/3/2023. There is a record of a bond update being submitted on 27/7/2023, four months after the latest date that could be considered 'completion' of the 2022 IEA.	Non-compliant	NA	Within 3 months of the next IEA, Proponent may seek an extension of time from the Department to submit the review, due to the amount of time necessary to prepare it.
DA 231-10-99 MOD 5	3	29	ABORIGINAL CULTURAL HERITAGE	The Applicant shall prepare and implement an Aboriginal Cultural Heritage Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with Aboriginal stakeholders; (b) be submitted to the Secretary for approval by 31 August 2015; (c) describe the measures that would be implemented to: • manage known Aboriginal objects and sites; • monitor all new surface disturbance on site for unidentified Aboriginal objects; • manage the discovery of any human remains or previously unidentified Aboriginal objects on site; and (d) ensure ongoing consultation with Aboriginal stakeholders in the management of any Aboriginal cultural heritage values on site.	8.03, 4.02, 10.02, 13.03	Activities are operated in accordance with the Aboriginal Cultural Heritage Management Plan (ACHMP) (31/08/2018). a) An attempt to consult with LALCs was made in 2015 but no responses were received. No ongoing consultation has been carried out and none has been required as the defined triggers in the management plan have not occurred. b) The Plan is dated 31 August 2015 and we understand was submitted by this date, but it is outside of this audit period. c) Current extraction area far from sites. they are physically marked. d) The ongoing consultation triggers in the plan have not occurred.  2022 IEA: Non-compliant - "A review of the ACHMP shows that recommendations from the 2016 and 2019 IEAs have not been adopted, as no updates to the consultation section of the ACHMP have been made and no evidence available to indicate that Holcim have tried to close out this lack of consultation in the ACHMP. Forster LALC and Purfleet-Taree LALC have both been attempted to be contacted as per the ACHMP Rev B. Additionally, no approval of the ACHMP is evident within the document, however the requirement for Department approval is noted in Section 1.4"  This audit team has a different view on this condition to the previous two audit teams. The audit team has not been provided evidence of Departmental approval of the plan; however, other lines of evidence (i.e. AEMRs and annual review correspondence for management plans) indicate the Department has received and approved the ACHMP. Noting that, this audit team believes the requirement to prepare the ACHMP in consultation with aboriginal stakeholders has been met via the attempt to consult and the Department's endorsement of the level of consultation that is evidenced in its acceptance of the plan. In terms of strict compliance with the requirements of this Condition, this audit team	Compliant	1. The Proponent shall contact Forster LALC and Purfleet-Taree LALC (or alternative LALCs as appropriate and reflecting current management structures) and provide the approved ACHMP, the most recent AEMR and this 2025 audit report. The Proponent is to invite comment from the aboriginal stakeholders on these documents. Any comments received are to be considered in future management of the Site and any revision of the approved ACHMP.  2. The cultural heritage sites identified on the Site should be added as a layer in Propellar so they are visible to users when using the system for planning and review of activities.	NA
DA 231-10-99 MOD 5	3	30	TRANSPORT - Operating Conditions	The Applicant shall ensure that: (a) all vehicles entering or leaving the site carrying material that is capable of generating wind-borne dust have their loads covered or suitably contained within the truck; and (b) all laden vehicles leaving the site are cleaned of materials that may fall on the road, before leaving the site.	14.02, 8.03, 3.01, 3.02, 3.03	Inspections at weighbridge - cameras on weighbridge. Non compliance reports go into icare. All vehicles are contract trucks - Holcim tier 1 and then additional trucks. All drivers undergo induction and toolbox. There is an inspection and tarping bay where proper tarping can be observed. Wheel wash at exit.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	31	TRANSPORT - Pacific Highway intersection	The Applicant shall maintain the intersection of the Pacific Highway and the Jandra Quarry Access Road, for the duration of product transport from the site, to the satisfaction of the RMS.	1.01, 1.02, 8.03	Section 6.5.3 of the 2022-2024 Annual Reviews discuss maintenance of this intersection. The Annual Reviews reported that the site has maintained the intersection at the Pacific Highway and Quarry Access Road as required, and that no impacts to the intersection were identified. The intersection was re-sealed 18 months ago by RMS and the audit team observed the intersection to be in good condition.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	32	TRANSPORT - Pacific Highway intersection	The Applicant shall install and subsequently maintain street lighting at the intersection of the Pacific Highway and the Jandra Quarry Access Road, to the satisfaction of the RMS, prior to transporting quarry products from the site outside of the hours 7 am to 6 pm. Any works affecting the Pacific Highway must not take place without the prior approval of the RMS.	1.01, 1.02, 8.03	There are two light towers in place at the intersection, which appear to be adequate.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	3	33	TRANSPORT - Monitoring of Product Transport	The Applicant shall keep accurate records of: (a) the amount of quarry products, including asphalt, transported from the site (calendar month and Year); (b) the number of laden vehicle movements to and from the site (day, calendar month and year); and (c) publish these records on its website at the end of each calendar quarter.	3.01, 3.02, 3.03, 3.07, 14.04	Annual truck movement summaries reviewed for data during the audit period (2022, 2023, 2024 and YTD 2025). a) Tonnage of transported products transported from the site for each calendar month, quarter, and year are included in the summaries. b) Number of laden vehicle movements per day is presented in these summaries. c) Website was accessed August 2025 and up to date truck data for 2025 was available.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	34	VISUAL IMPACTS	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development; (b) ensure that all external lighting associated with the development complies with Australian Standard AS4282 (INT) 1997 - Control of Obtrusive Effects of Outdoor Lighting, or its latest version; and (c) take all practical measures to shield views of quarrying operations from users of public roads and privately-owned residences, to the satisfaction of the Secretary.	1.01, 1.02, 9	All lighting directed into the site, no visibility from highway. No lighting or visual amenity complaints have been received and no concerns raised by regulatory agencies.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	35	WASTE	The Applicant shall: (a) implement all reasonable and feasible measures to minimise the waste generated by the development; (b) ensure that the waste generated by the development is appropriately stored, handled and disposed of; and (c) monitor and report on effectiveness of the waste minimisation and management measures each calendar year, to the satisfaction of the Secretary.	1.01, 1.02, 8.01, 8.02, 8.03	a) The Annual Reviews prepared during the audit period (2022, 2023, 2024) discuss measures taken to minimise the waste generated by the development. These include - wherever possible - minimising general waste, and sorting all oil, cardboard, paper and steel on site prior to fortnightly removal to recycling facilities in the region. Tyres from machinery are re-used for traffic management, garden edging and signage stabilisers. b) Adequate waste receptacles are available on Site and were observed to be used well. c) Reporting on waste minimisation and management measures is included in each Annual Review prepared during the audit period (2022, 2023, 2024). It is understood that these reports were approved by the Secretary prior to website upload.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	36	WASTE	Except as expressly permitted in an EPL, the Applicant must not receive waste at the site for storage, treatment, processing, reprocessing or disposal.	3.05	The EPL only allows concrete washout to be accepted. This material is received and tracked on the weighbridge. A tracking sheet has been sighted and no significant stockpile(s) of concrete washout waste were observed on site during the inspection, or review of aerial images. There is no evidence to suggest other waste streams are being received.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	37	LIQUID STORAGE	The Applicant shall ensure that all liquid storage facilities are protected by appropriate bunding, which must exceed 110% of the stored volume of the liquid.		The standard of bunding at the site and liquid storage was of a good standard. Bunding exceeded 110% of the largest container.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	38	DANGEROUS GOODS	The Applicant shall ensure that the storage, handling, and transport of dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.	1.01, 1.02, 10.07	Compressed gasses, fuels and paints stored and labelled in secure locations. Diesel and aggregate precoat stored in banded position. Fire fighting equipment located near by and appropriately labelled. Spill kits available at various logical positions on site. Emergency response plan available and located on site. MSDS folder sighted.	Compliant	NA	NA
DA 231-10-99 MOD 5	3	39	BUSHFIRE	The Applicant shall: (a) ensure that the development is suitably equipped to respond to any fires on site; and (b) assist the Rural Fire Service, emergency services and National Parks and Wildlife Service as much as possible if there is a fire in the surrounding area.	1.01, 1.02	a) The site has firefighting pumps and hoses available for use as needed and has demonstrated ability to provide access, egress and access to water for RFS and others (such as neighbours) in previous fires (i.e. 2019). b) No assistance was requested during this audit period.  Fires occurred in 2019 and the emergency evacuation plan was implemented and site was vacant.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	4	1	NOTIFICATION OF LANDOWNERS	As soon as practicable after obtaining monitoring results showing an exceedance of any relevant criteria in Schedule 3, the Applicant shall notify affected landowners in writing of the exceedance, except where a negotiated agreement has been entered into in relation to that impact, and provide regular monitoring results to each affected landowner until the development is complying with the relevant criteria.	1.01, 1.02, 8.02	<p>The blast exceedance in April 2023 was found to be caused by improper monitoring device installation and hence was not considered an exceedance and highly questionable, therefore, if any resident was 'affected'.</p> <p>For the 6 June 2023 exceedance - Blast overpressure of 115.4 dB (limit of 115 dB), which was 6.25% of annual blasts (limit of 5%) - it was unclear whether the individual exceedance would be outside the 5% allowance for non-conforming results within the year. Once 2023 had ended and it was apparent the 5% allowance was exceeded, the Proponent determined that due to (a) the size of the exceedance, (b) the context of other complying results and (c) the lack of complaints or negative feedback from neighbours suggested the landowner was not 'affected' and hence were not affected.</p> <p>The audit team accepts this position and cannot conclude, with a high degree of certainty, that the landowner was 'affected'. Therefore the</p>	Not triggered	NA	NA
DA 231-10-99 MOD 5	4	2	INDEPENDENT REVIEW	If an owner of privately-owned land considers the development to be exceeding the relevant criteria in Schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land.	1.01, 1.02	No such requests have been made.	Not triggered	NA	NA
DA 231-10-99 MOD 5	4	3	INDEPENDENT REVIEW	<p>If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision the Applicant shall:</p> <ul style="list-style-type: none"> <li>(a) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to:</li> <li>• consult with the landowner to determine his/her concerns;</li> <li>• determine whether the development is complying with the relevant criteria in Schedule 3; and</li> <li>• if the development is not complying with these criteria then identify measures that could be implemented to ensure compliance with the relevant criteria; and</li> <li>(b) give the Secretary and landowner a copy of the independent review.</li> </ul>	1.01, 1.03	No such requests have been made.	Not triggered	NA	NA
DA 231-10-99 MOD 5	4	4	INDEPENDENT REVIEW	If the independent review determines that the development is complying with the relevant criteria in Schedule 3, then the Applicant may discontinue the independent review with the approval of the Secretary.	1.01, 1.04	No such requests have been made.	Not triggered	NA	NA
DA 231-10-99 MOD 5	4	5	INDEPENDENT REVIEW	<p>If the independent review determines that the development is not complying with the relevant criteria in Schedule 3, then the Applicant shall:</p> <ul style="list-style-type: none"> <li>(a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent expert, and conduct further monitoring to determine whether these measures ensure compliance; or</li> <li>(b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.</li> </ul>	1.01, 1.05	No such requests have been made.	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	5	1	ENVIRONMENTAL MANAGEMENT CONDITIONS - Environmental Management Strategy	<p>The Applicant shall prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:</p> <p>(a) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(b) provide the strategic framework for the environmental management of the development;</p> <p>(c) identify the statutory approvals that apply to the development;</p> <p>(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development,</p> <p>(e) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>• receive, handle, respond to, and record complaints;</li> <li>• resolve any disputes that may arise during the course of the development;</li> <li>• respond to any non-compliance; and</li> <li>• respond to emergencies; and</li> </ul> <p>(f) include:</p> <ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this development consent; and</li> <li>• a clear plan depicting all the monitoring required to be carried out under the conditions of this consent.</li> </ul>	1.01, 1.02, 8.01, 8.02, 8.03, 10.05	<p>Activities are operated in accordance with the Environmental Management Strategy (EMS) (undated).</p> <p>a) The management plan was submitted prior to this audit period and several lines of evidence suggest it was approved by the Department.</p> <p>b) Section 3 provides the strategic framework for environmental management.</p> <p>c) The Permits and Obligations Register in Appendix A1 identifies the legislation relevant for the operations, as well as the specific statutory approvals arising from each of these pieces of legislation.</p> <p>d) Resources, roles and responsibilities of key personnel are presented in Section 5.2.</p> <p>e) These procedures are covered as follows: local community and relevant agencies (Section 7.2), complaints management (Section 7.3.2), dispute resolution (Section 7.3.3), non-compliances (Section 9.4), and emergency response (Section 8).</p> <p>f) Table 5 in Section 5.1.2 details the specific environmental management plans that support the EMS. Table 6 in Section 9.2 presents the types of monitoring required and the relevant management plans where specific details of the monitoring is included. However, the specific details are not presented in the EMS.</p>	Compliant	NA	NA
DA 231-10-99 MOD 5	5	2	ENVIRONMENTAL MANAGEMENT CONDITIONS - Adaptive Management	<p>The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant shall, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur,</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p>	1.01, 1.02, 9.02	<p>The audit team concludes that, on the few occasions where exceedances of site criteria have occurred (or other issues, such as equipment failure) have occurred, the Proponent has taken appropriate steps to rectify the issue and made reasonable efforts to prevent future non-compliance.</p> <p>In terms of compliance with requirement (b) regarding notification of the Department 'at the earliest opportunity', the Department issued an official caution in March 2025 for failure to report the blasting exceedances in 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasing overpressure limit had crystallised, a precautionary notification should have been made to the Department. The exceedances were discussed in the 2023 AEMR submitted in Q2 2024, but the AEMR is not considered an appropriate vehicle for notification of individual exceedances.</p>	Non-compliant	NA	The Proponent is to assess its internal procedures for the identification and notification of exceedances of environmental performance criteria, to ensure they are fit for purpose. Notifications of exceedances should occur, regardless of whether the Proponent disputes the veracity of the exceedance. Any dispute or mitigating circumstances can simply be discussed in the notification.



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	5	3	ENVIRONMENTAL MANAGEMENT CONDITIONS - Management Plan Requirements	<p>The Applicant shall ensure that the Management Plans required under this consent are prepared in accordance with any relevant guidelines, and include</p> <p>(a) detailed baseline data;</p> <p>(b) a description of:</p> <ul style="list-style-type: none"> <li>the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>any relevant limits or performance measures/criteria; and</li> <li>the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures;</li> </ul> <p>(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;</p> <p>(d) a program to monitor and report on the:</p> <ul style="list-style-type: none"> <li>impacts and environmental performance of the development; and</li> <li>effectiveness of any management measures (see (c) above);</li> </ul> <p>(e) a contingency plan to manage any unpredicted impacts and their consequences;</p> <p>(f) a program to investigate and implement ways to improve the environmental performance of the development over time;</p> <p>(g) a protocol for managing and reporting any:</p> <ul style="list-style-type: none"> <li>incidents;</li> <li>complaints;</li> <li>non-compliances with statutory requirements; and</li> <li>exceedances of the impact assessment criteria and/or performance criteria; and</li> </ul> <p>(h) a protocol for periodic review of the plan.</p> <p><b>Note:</b> The Secretary may waive some of these requirements if they are unnecessary or unaffected for particular management plans.</p>	1.02, 10	Points have been raised elsewhere, regarding adequacy of the preparation and implementation of specific management plans. However, noting that no management plans were prepared within this audit period, this condition is not triggered for the purposes of this audit.	Not triggered	NA	NA
DA 231-10-99 MOD 5	5	4	ENVIRONMENTAL MANAGEMENT CONDITIONS - Annual Review	<p>By the end of March each year, the Applicant shall review the environmental performance of the development to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development (including rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against:</p> <ul style="list-style-type: none"> <li>the relevant statutory requirements, limits or performance measures/criteria;</li> <li>the monitoring results of previous years, and</li> <li>the relevant predictions in the documents listed in condition 2 of Schedule 2;</li> </ul> <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the development;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and</p> <p>(f) describe what measures will be implemented</p>	8.01, 8.02, 8.03	Annual reviews for 2022, 2023 and 2024 were obtained and reviewed. All reviews were dated prior to the end of March. Submission records were not sighted, but the audit team was advised that the AEMRs are submitted on the day they are approved by the Quarry Manager. The content of the annual reviews complies with this condition and no concerns have been raised by the Department or other Stakeholders regarding these reports.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	5	5	ENVIRONMENTAL MANAGEMENT CONDITIONS - Revision of Strategies, Plans & Programs	<p>Within 3 months of the submission of an:</p> <p>(a) annual review under condition 4 above;</p> <p>(b) incident report under condition 6 below;</p> <p>(c) audit report under condition 8 below; and</p> <p>(d) any modifications to this consent, the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this consent to the satisfaction of the Secretary.</p> <p><b>Note:</b> This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</p>	4.01, 4.02	<p>Correspondence has been obtained to demonstrate the Proponent reviewed the management plans following the 2022 IEA, and 2022 and 2023 annual reviews. The submission timeframe for these letters complies with the 3 month period specified in this condition.</p> <p>We note the recommendations of previous IEAs regarding management plans. This audit team does not necessarily agree with the Proponent's conclusion in their reviews that the management plans do not require revision; however, strict compliance with this condition relates to the administrative process of reviewing the plans. This audit team believes that several of the plans, such as the SWMP, ACHMP, and noise management plan should be revised to reflect changes in legislation, recommendations from previous IEAs and changed conditions (i.e. pit expansion, layout changes and removal of the asphalt plant).</p> <p>However, it is the professional opinion of this audit team that the management plans are broadly fit for purpose and their ongoing use does not create any major inconsistencies or risk of environmental harm. The audit team does not have sufficient evidence to take a contrary position to the Proponent and find that their conclusions regarding adequacy of</p>	Compliant	The Proponent should consider revision of the SWMP, ACHMP and NMP at a minimum, or otherwise supplement them (for example, with an addendum) to ensure they reflect current Site conditions, current statutory requirements and current best practice and state of knowledge.	NA
DA 231-10-99 MOD 5	5	6	REPORTING - Incident Reporting	<p>The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.</p>	1.02, 8.02, 8.03	<p>There were no incidents within audit period that caused material harm and no notifications of that type were required.</p> <p>Dust Sentry Pro sensor failed. 6 day dust results - did not cause material harm, but still required notification. The data was not available from 28 June 2024 and 13 Sep 2024. Notification was made to the Department 19 September 2024.</p> <p>Proponent was advised by th econsultant that the data was retrievable, but this was not the case.</p> <p>This notification complied with the requirement to notify as soon as practicable.</p> <p>An official caution was received in March 2025 for failure to notify exceedances of overblast pressure in April and June 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasing overpressure limit had crystallised, a precautionary notification should have been made to the Department.</p>	Non-compliant	NA	The Proponent is to assess its internal procedures for the identification and notification of exceedances of environmental performance criteria, to ensure they are fit for purpose. Notifications of exceedances should occur, regardless of whether the Proponent disputes the veracity of the exceedance. Any dispute or mitigating circumstances can simply be discussed in the notification.
DA 231-10-99 MOD 5	5	7	REPORTING - Regular Reporting	<p>The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this consent.</p>	14.04	<p>Website observed prior to the audit inspection and screenshot obtained in August during preparation of the report. The required reports and data are available on the Website.</p>	Compliant	NA	NA
DA 231-10-99 MOD 5	5	8	INDEPENDENT ENVIRONMENTAL AUDIT	<p>By 31 March 2016, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <p>(a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL and/or Water License (including any assessment, plan or program required under these approvals);</p> <p>(d) review the adequacy of any approved strategy, plan or program required under the these approvals; and</p> <p>(e) recommend measures or actions to improve the environmental performance of the development and/or any</p>	1.02, 13.03	<p>The most recent Independent Environmental Audit (IEA) was conducted by NGH Pty Ltd (NGH) and covered the audit period of 17 September 2019 to 13 July 2022 (the 2022 IEA).</p> <p>a) The Secretary's endorsement of the proposed team was provided on 27/06/2022, and is included as Appendix B of the 2022 IEA.</p> <p>b) Consultation conducted is included as Appendix C of the 2022 IEA.</p> <p>c) The Audit Scope in Section 1.4 confirmed that these aspects were covered.</p> <p>d) The Recommendations in Section 5 note that Environmental Management Plans should be updated as soon as practicable to incorporate recommendations from this and previous IEAs, i.e. inadequacies were observed.</p> <p>e) Recommendations are presented in Section 5.</p>	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
DA 231-10-99 MOD 5	5	9	INDEPENDENT ENVIRONMENTAL AUDIT	Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	13.03, 13.04	Department approval of the audit team was received on 27 June 2022, three months since this date is 27 September 2022, which is taken as the due date for submission. Final Report v1.0 is dated 2 March 2023, outside of the due date. Submission date was 27/3/2023 as confirmed in correspondence from the Department dated 3/8/2023. This condition was not complied with for the 2022 audit, the submission deadline for which fell within this audit period. We note that due to the date on the 2022 IEA audit report, the Consultant engaged did not provide the report in a timely manner to allow the Proponent to comply with this condition.	Non-compliant	NA	Future IEAs to be prepared and submitted within the 3 month timeframe, or the audit team is to write to the Department and seek an extension, setting out the reasons as to why an extension should be granted.
DA 231-10-99 MOD 5	5	10	ACCESS TO INFORMATION	By 31 August 2015, the Applicant shall: (a) make the following information publicly available on its website: • the documents listed in condition 2 of Schedule 2; • current statutory approvals for the development; • approved strategies, plans or programs; • a summary of the monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this consent; • a complaints register, which is to be updated on a quarterly basis; • the annual reviews (over the last 5 years); • any independent environmental audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary.	14.04	<ul style="list-style-type: none"> <li>documents listed in condition 2 of Schedule 2 are available.</li> <li>current statutory approvals are available.</li> <li>strategies, plans or programs are available - the website does not have departmental approval correspondence, but that is not essential.</li> <li>environmental monitoring data available.</li> <li>complaints register is available, current to Q2 of 2025.</li> <li>annual reviews since 2015 are available.</li> <li>2016, 2019, and 2022 independent environmental audits are available. However, only the 2016 report includes the Applicant's response to recommendations.</li> <li>it is unknown whether any other matter was required by the Secretary for publishing on the website.</li> </ul> b) some data/information is not up to date, as identified above.	Compliant	NA	NA
EPL 2796	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. <b>Note:</b> Waste conditions L3.1, L3.2 and L3.3 of this licence restrict the types of waste that may be received at the Premises.	1.01, 1.02, 14.05	No other scheduled activities are carried out except those listed.	Compliant	NA	NA
EPL 2796	Administrative Conditions	A1.2	What the licence authorises and regulates	Notwithstanding the fee scales noted above, the licensee must not: (a) extract more than 490,000 tonnes of quarry products from the premises per calendar year; and (b) transport more than 475,000 tonnes of quarry products from the premises per calendar year <b>Note:</b> This condition has been added to be consistent with development consent DA231-10-99 MOD 5.	8.01, 8.02, 8.03, 8.04, 3.01, 3.02, 3.03, 3.07	The fee paying activity scales are appropriate and the limits specified have been complied with during this audit period.	Compliant	NA	NA
EPL 2796	Administrative Conditions	A2.1	Premises or plant to which this licence applies	The licence applies to the following premises: Premises Details JANDRA QUARRY 15312 PACIFIC HIGHWAY POSSUM BRUSH NSW 2430 LOT 2 DP 255621, LOT 11 DP 790056, LOT 12 DP 790056, LOT 13 DP 790056, LOT 14 DP 790056, LOT 15 DP 790056	12.01	LOT 2 DP 255621, LOT 11 DP 790056, LOT 12 DP 790056, LOT 13 DP 790056, LOT 14 DP 790056, LOT 15 DP 790056. Confirmed these are the correct lots by cross referencing the EA and SixMaps cadastral layers.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Administrative Conditions	A3.1	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.	12.01	As integrated development, the licence application is based on the SSD EA. The development and activities are being conducted generally in accordance with the EA.	Compliant	NA	NA
EPL 2796	Discharges to Air and Water and Applications to Land	P1.1	Location of monitoring/discharge points and areas	The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.	1.01, 1.02	The points are consistent with those identified in Site Management Plans and physically marked and identified on Site.	Compliant	NA	NA
EPL 2796	Discharges to Air and Water and Applications to Land	P1.2	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.	1.02	No utilisation areas are defined.	Not triggered	NA	NA
EPL 2796	Discharges to Air and Water and Applications to Land	P1.3	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.	1.01, 1.02	The point is consistent with those identified in the Soil and Water Management Plan and physically marked and identified on Site.	Compliant	NA	NA
EPL 2796	Discharges to Air and Water and Applications to Land	P1.4	Location of monitoring/discharge points and areas	The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.	1.01, 1.02	The points are consistent with those identified in Site Management Plans and physically marked and identified on Site.	Compliant	NA	NA
EPL 2796	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, 8.01, 8.02, 8.03	Water discharge monitoring results confirm that discharge is within acceptable criteria and are consistent with the general obligations that exist under s120 of the POEO Act.	Compliant	NA	NA
EPL 2796	Limit Conditions	L2.1	Concentration limits	For each monitoring/discharge point or utilisation area specified in the tables 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.	7.06, 8.01, 8.02, 8.03	Discharge of surface water during the audit period complied with these limits.	Compliant	NA	NA
EPL 2796	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.	7.06, 8.01, 8.02, 8.03	pH results for discharge in the audit period is within the specified criteria.	Compliant	NA	NA
EPL 2796	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 tables.	7.06, 8.01, 8.02, 8.03, 1.01, 1.02	Considering the likely pollutant sources that may be present in runoff at the Site, and the good standard of liquid storage and general housekeeping, it is unlikely that contaminants other than suspended solids are present in surface waters at the Site.	Compliant	NA	NA
EPL 2796	Limit Conditions	L2.4	Concentration limits	Water and/or Land Concentration Limits	NA	No requirements - subheading only.	Not triggered	NA	NA
EPL 2796	Limit Conditions	L3.1	Waste	The licensee must not cause, permit or allow any waste to be received at the premises, except concrete "wash-out" waste from concrete batch plants. All other wastes are not permitted on the premises, except as expressly permitted by this licence.	1.01, 1.02, 3.05	Site observations, discussions with site personnel and review of records at the Site confirm that other waste types are not being received on Site.	Compliant	NA	NA
EPL 2796	Limit Conditions	L3.2	Waste	The licensee must not: • Process more than 3000 tonnes of concrete "wash-out" per annum; • Store more than 1000 tonnes of concrete "wash-out" on the premises at any one time.	8.01, 8.02, 8.03, 3.05, 1.01, 1.02	The Site has complied with these limits.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Limit Conditions	L3.3	Waste	Concrete 'wash-out' must be stockpiled on site in banded areas and can be processed and blended with quarry raw product to produce quarry product(s).	1.02	No concrete waste was present on site during the site inspection, however the allocated storage area was sighted and site management's description of the material receipt, storage and use were consistent with what the licence allows.	Compliant	NA	NA
EPL 2796	Limit Conditions	L4.1	Noise limits	Noise generated at the premises must not exceed the noise limits in the tables below. The locations referred to in the tables below are indicated in the document titled: "Jandra Quarry Intensification of Production Environmental Assessment (DA 231-10-99 MOD 5)" Dated July 2014	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period.	Compliant	NA	NA
EPL 2796	Limit Conditions	L4.2	Noise limits	Noise from the premises during quarrying operations only must not exceed the limits specified in the following table:	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Noise monitoring reports for the audit period demonstrate compliance with the specified limits. The annual reviews do not self-report any exceedances and there have been no complaints during the audit period.	Compliant	NA	NA
EPL 2796	Limit Conditions	L4.3	Noise limits	Noise from the premises during operations including asphalt plant must not exceed the limits specified in the following table: <b>Note:</b> 1. Condition 10 of Schedule 2 of development consent DA 213 - 10-99 MOD 5 prohibits quarrying operations during the hours of 10 pm-6 am; 2. Receiver locations are shown on the figure in Appendix 2 of development consent DA 213-10-99 a copy of which has been filed as EPA document DOC15/85830; 3. Noise limits are in accordance with development consent DA 231-10-99 MOD 5; 4. A negotiated agreement is in place for Residence R1 as referred to in development consent DA 231-10-99 MOD 5 & any noise issues from this premises will be addressed by the Department of Planning and Environment.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Note that no noise monitoring was conducted when an asphalt production campaign was underway. The asphalt plant was decommissioned during the audit period and these limits are no longer relevant for future monitoring, unless the plant is reinstated.	Not triggered	NA	NA
EPL 2796	Limit Conditions	L4.4	Noise limits	For the purpose of the conditions above: • Shoulder, Day and Evening is defined as the period from 6am - 10pm • Night is defined as the period from 10pm - 6am	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Noise reports use the correct terminology and periods consistent with this condition.	Compliant	NA	NA
EPL 2796	Limit Conditions	L4.5	Noise limits	Noise enhancing meteorological conditions a) The noise limits set out in condition L4.1, L4.2 and L4.3 apply under the following meteorological conditions specified in the table below. b) For those meteorological conditions not referred to in condition L4.5 a), the noise limits that apply are the noise limits in condition L4.1, L4.2 and L4.3 plus 5dB.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Monitoring was not conducted during noise enhancing conditions.	Not triggered	NA	NA
EPL 2796	Limit Conditions	L4.6	Noise limits	For the purposes of condition L4.5: a) The meteorological conditions are to be determined from meteorological data obtained from the meteorological weather station identified as EPA monitoring point 4 (Condition P1.4). b) Stability category shall be determined using the following method from Fact Sheet D of the Noise Policy for Industry (NSW EPA, 2017); i. Direct measurement of temperature lapse rate (section D1.2); or ii. Use of sigma-theta data (section D1.4).	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05, 1.04	Noise enhancing conditions were not identified during noise monitoring. However, the on site weather station has been confirmed as available for the purposes of calculating these parameters as needed.	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Limit Conditions	L4.7	Noise limits	To assess compliance: a) with the LAeq(15 minute) or the LA1(1 minute) noise limits in condition L4.1, L4.2, L4.3 and L4.5, the noise measurement equipment must be located: (i) approximately on the property boundary, where any residence is situated 30 metres or less from the property boundary closest to the premises; or where applicable, (ii) in an area within 30 metres of a residence façade, but not closer than 3 metres where any residence on the property is situated more than 30 metres from the property boundary closest to the premises, or, where applicable, (iii) in an area within 50 metres of the boundary of a National Park or Nature Reserve, (iv) at any other location identified in condition L4. b) with the LAeq(15 minute) or the LA1 (1 minute) noise limits in condition L4.1, L4.2, L4.3 and L4.5, the noise measurement equipment must be located: (i) at the reasonably most affected point at a location where there is no residence at the location; or, (ii) at the reasonably most affected point within an area at a location prescribed by condition L4.7(a).	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Where measurements were taken, they complied with this condition regarding placement/location of the measurements. In some instances, access could not be obtained and therefore monitoring could not be conducted. This is not a non-compliance with this condition, as failure to monitor at those locations is not a non-compliance with this provision of the EPL (monitoring frequency and location is dealt with by condition M8.1).	Compliant	NA	NA
EPL 2796	Limit Conditions	L4.8	Noise limits	A non-compliance of conditions L4.1, L4.2, L4.3 and L4.5 will still occur where noise generated from the premises is measured in excess of the noise limit at a point other than the reasonably most affected point at the locations referred to in condition L4.7(a) or L4.7(b). <b>Note:</b> to L4.7 and L4.8: The reasonably most affected point is a point at a location or within an area at a location experiencing or expected to experience the highest sound pressure level from the premises.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Not triggered, all measurements, where taken, were taken at the receiver and not at any other reasonably affected location.	Not triggered	NA	NA
EPL 2796	Limit Conditions	L4.9	Noise limits	For the purpose of determining the noise generated from the premises, the modifying factor corrections in Table C1 on Fact Sheet C of the Noise Policy for Industry (NSW EPA, 2017) may be applied, if appropriate, to the noise measurements by the noise monitoring equipment.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Corrective factors were not required.	Not triggered	NA	NA
EPL 2796	Limit Conditions	L4.10	Noise limits	Noise measurements must not be undertaken where rain or wind speed at microphone level will affect the acquisition of valid measurements.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Atmospheric and weather conditions during monitoring was acceptable and no rain or excessive wind speed was reported.	Compliant	NA	NA
EPL 2796	Limit Conditions	L5.1	Blasting	Blasting in or on the premises must only be carried out between 9am and 5pm, Monday to Friday and 9am and 3pm, Saturday. Blasting in or on the premises must not take place on Sundays or Public Holidays without the prior approval of the EPA.	7.03, 7.04	Blast records indicate that all blasts were carried out within the approved hours.	Compliant	NA	NA
EPL 2796	Limit Conditions	L5.2	Blasting	The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal.  Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation sequence and/or offset delay being too small.  No exceedances from 2024 and 2025.	Non-compliant	NA	Continue monitoring blasts and follow blasting contractor recommendations for location of blast holes and sequence timing. Continue monitoring and if further exceedances occur, consider the need to modify blasting methodology.
EPL 2796	Limit Conditions	L5.3	Blasting	The airblast overpressure level from blasting operations in or on the premises must not exceed: 120 dB (Lin Peak) at any time; at either monitoring point 2 or 3 of this licence.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Blasting results are compliant with this limit.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Limit Conditions	L5.4	Blasting	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 5 mm/second for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Exceedance on 28 April 2023 of 6.1 mm/sec at R2 (reported to EPA and DPHI). On 10 May 2023 Holcim provided an additional Blast Exceedance Result Report to the Department as per Schedule 5 Condition 6 of the development consent. The finding of this report determined that the use of soil spikes likely lead to unreliable results. This result was then excluded from maximum values going forward.	Compliant	NA	NA
EPL 2796	Limit Conditions	L5.5	Blasting	The ground vibration peak particle velocity from blasting operations carried out in or on the premises must not exceed: 10 mm/second at any time; at either monitoring point 2 or 3 of this licence.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Blasting results are compliant with this limit.	Compliant	NA	NA
EPL 2796	Limit Conditions	L5.6	Blasting	Error margins associated with any monitoring equipment used to measure blasts must not be taken into account when determining whether or not the limit has been exceeded.	7.01, 7.02, 7.03	Error margins have not been taken into account, however as detailed above, the incorrect installation of monitoring equipment was found to be the cause of a peak particle velocity exceedance.	Compliant	NA	NA
EPL 2796	Limit Conditions	L5.7	Blasting	Offensive blast fume must not be emitted from the premises. Definition: Offensive blast fume means post-blast gases from the detonation of explosives at the premises that by reason of their nature, duration, character or quality, or the time at which they are emitted, or any other circumstances: 1. are harmful to (or likely to be harmful to) a person that is outside the premises from which it is emitted, or 2. interferes unreasonably with (or is likely to interfere unreasonably with) the comfort or repose of a person who is outside the premises from which it is emitted.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	Available lines of evidence indicate that blast fume is not emitted in contradiction to this condition. No odour complaints were received during the audit period and no reports of excessive dust or particulate drift were included in blasting records.	Compliant	NA	NA
EPL 2796	Limit Conditions	L6.1	Hours of operation	In accordance with development consent DA 231-10-99 MOD 5, hours of operation for the premises are specified in the table below:	1.02, 8.01, 8.02, 8.03	Multiple lines of evidence indicate that operating hours were complied with during the audit period.	Compliant	NA	NA
EPL 2796	Limit Conditions	L6.2	Hours of operation	In accordance with development consent DA 231-10-99 MOD 5, the following activities may be conducted at the premises outside the hours specified in the table above: (a) return of trucks to the premises prior to midnight Monday to Saturday; (b) delivery or dispatch of materials as requested by Police, Fire Brigade or other similar authorities; (c) emergency work to avoid the loss of lives, property and/or prevent environmental harm; and (d) maintenance activities provided it is inaudible at residential premises. In circumstances outlined in (b) and (c), the Licensee shall notify affected residents prior to undertaking the activities, or as soon as practical thereafter.	1.02, 8.01, 8.02, 8.03	s4.4. of ARs 2022 Annual Review - "Site has not operated outside the hours of 7am and 6pm". 2023 Annual Review - "Site does not operate outside the hours of 7am and 6pm". 2024 - no detail regarding compliance with hours 2025 - 6am to 6pm. But restrictions before 7am on RL 50 and above. Operating hours were discussed in the Site interview. Staff noted that there had been an issue in the previous audit period regarding operation of mobile plant in the morning shoulder period, but this learning had been taken on board and that activity no longer occurred. The asphalt plant activity was ceased.	Compliant	NA	NA
EPL 2796	Limit Conditions	L7.1	Potentially offensive odour	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.	1.01, 1.02, 9	No odours observed on site during the audit. No odour complaints over the last three years. Downer batching plant not operational during the audit period.	Compliant	NA	NA
EPL 2796	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.	1.02, 1.01, 8.01, 8.02, 8.03	On review of the documentation set out in the evidence file, and based on the auditor's observations on Site, the audit team is satisfied the Site is operated in an environmentally responsible manner and the Proponent is implementing reasonable and feasible measures to minimise harm to the environment. Note the listed evidence file references are not exhaustive for this broad compliance requirement.	Compliant	NA	NA
EPL 2796	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	Plant and equipment was observed to be operating effectively on the day of the audit inspections. No breakdowns, noisy plant or other issues were observed. Site Management explained in detail the maintenance planning process and provided documents to illustrate the robust system for maintenance management at the Site. The audit team has not identified any evidence that would suggest plant it not being maintained to the required standard.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Operating Conditions	O3.1	Dust	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	1.01, 1.02, 9, 8.01, 8.02, 8.03, 7.03	<p>Dust suppression measures were found to be in place and functioning effectively. These included the deployment of water carts along haul routes, the use of chemical suppressants during material processing, and the installation of physical barriers on crushing and sorting equipment. No off-site dust emissions were detected, and no complaints related to dust were recorded during the review period.</p> <p>Odour management was also assessed as satisfactory. No odours were identified during site inspections, and no odour-related complaints were received.</p> <p>Air quality monitoring is conducted routinely, covering both PM10 concentrations and depositional dust levels. The Quarry Manager oversees the review of monitoring data, and both the manager and site staff conduct ongoing visual assessments of air quality. Operational adjustments are made as needed, including the use of water trucks to mitigate visible dust emissions.</p> <p>Evidence of progressive rehabilitation was observed. Specific areas such as pit benches, the upper boundary of the site, and the lower sections of spoil stockpiles have undergone rehabilitation. Weed control measures are actively being implemented.</p> <p>No extraordinary events were reported during the audit timeframe.</p>	Compliant	NA	NA
EPL 2796	Operating Conditions	O4	Emergency response	<p>Note: The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The PIRMP must be developed in accordance with the requirements in Part 5.7A of the POEO Act and Regulations.</p> <p>The licensee must keep the PIRMP on the premises at all times. The PIRMP must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with the activities that occur at the premises and which are likely to cause harm to the environment. The PIRMP must be tested at least annually or following a pollution incident.</p>	10.07	The Site PIRMP was inspected and complies with the requirements of the PIRMP Guidelines. The test and revision record confirms that the plan has been tested every 12 months at a minimum. No incidents that triggered activation of the PIRMP in the licence period occurred.	Compliant	NA	NA
EPL 2796	Operating Conditions	O5.1	Processes and management	The licensee must take all reasonable measures to prevent the tracking of mud and debris onto the Pacific Highway including, but not limited to, ensuring all vehicles leaving the premises pass through the vehicular wheel wash.	1.01, 1.02	A functional wheel wash and buffer roadway exists prior to entry onto the Pacific Highway. No mud or sediment tracking was observed during the site audit and no complaints or regulatory action regarding sediment tracking occurred in the audit period.	Compliant	NA	NA
EPL 2796	Operating Conditions	O6.1	Waste management	The licensee must comply with the conditions as specified in this licence or where no specific conditions outlined in this licence, this licensee must comply with the Protection of the Environment Operations (Waste) Regulation 2014.	8.01, 8.02, 8.03, 3.05, 1.01, 1.02	Waste management on site complies with earlier requirements of the EPL and the general requirements of the Regulation.	Compliant	NA	NA
EPL 2796	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, 8	Records of monitoring are presented in annual reviews. Records are being retained as required.	Compliant	NA	NA
EPL 2796	Monitoring and Recording Conditions	M1.2	Monitoring records	<p>All records required to be kept by this licence must be:</p> <p>a) in a legible form, or in a form that can readily be reduced to a legible form;</p> <p>b) kept for at least 4 years after the monitoring or event to which they relate took place; and</p> <p>c) produced in a legible form to any authorised officer of the EPA who asks to see them.</p>	7, 8	Records of monitoring are presented in annual reviews. Records are being retained as required. Records are being retained in excess of the minimum 4 year period.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	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, 8.01, 8.02, 8.04, 8.03, 7.01, 7.02, 7.05	The continuous particulate monitoring is considered to comply with these requirements, as the samples are taken continuously by the device and not 'sampled' by an individual. The requisite information is available regarding the person/contractor responsible for installation and maintenance of the unit. Noise monitoring data complies with these requirements.  Water monitoring data for the site for the 2025 YTD tracking sheet includes the time the sample was taken and the initials of the person who collected the sample.	Compliant	NA	NA
EPL 2796	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, 8.01, 8.02, 8.04, 8.03, 7.01, 7.02, 7.05	The points monitored comply with these requirements.	Compliant	NA	NA
EPL 2796	Monitoring and Recording Conditions	M2.2	Requirement to monitor concentration of pollutants discharged	Air Monitoring Requirements <b>Note:</b> Special Method 1 means sampling and analysis using the aeroqual Dust Sentry Pro particle monitor.	1.01, 1.02, 7.09	The Dust Sentry Pro unit was observed operational and is the monitoring device deployed at the Site.	Compliant	NA	NA
EPL 2796	Monitoring and Recording Conditions	M2.3	Requirement to monitor concentration of pollutants discharged	Water and/ or Land Monitoring Requirements	1.01, 1.02, 2.04, 8.01, 8.02, 8.03, 7.06	Water monitoring complies with these requirements.	Compliant	NA	NA
EPL 2796	Monitoring and Recording Conditions	M3.1	Testing methods - concentration limits	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.	7.06, 8.01, 8.02, 8.04, 8.03, 7.01, 7.02, 7.05	Monitoring for air, noise and water is being conducted in accordance with relevant EPA procedures and methods.	Compliant	NA	NA
EPL 2796	Monitoring and Recording Conditions	M3.2	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. <b>Note:</b> The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".	7.06, 8.01, 8.02, 8.04, 8.03, 7.01, 7.02, 7.06	Monitoring for air, noise and water is being conducted in accordance with relevant EPA procedures and methods.	Compliant	NA	NA
EPL 2796	Monitoring and Recording Conditions	M4.1	Weather monitoring	At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.	7.08, 8.01, 8.02, 8.03	All monitoring is being undertaken by the automatic weather monitoring station as per specified requirements.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Monitoring and Recording Conditions	M4.2	Weather monitoring	Rainfall at the premises must be measured and recorded in millimetres per 24 hour period, at the same time each day. <b>Note:</b> The rainfall monitoring data collected in compliance with the above condition will assist in interpreting the effectiveness of stormwater management at the quarry.	7.08, 8.01, 8.02, 8.03	All monitoring is being undertaken by the automatic weather monitoring station as per specified requirements.	Compliant	NA	NA
EPL 2796	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	Complaints registers covering the audit period have been obtained. No complaints have been received.	Compliant	NA	NA
EPL 2796	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	The complaints form includes relevant fields for the required information to be captured.	Compliant	NA	NA
EPL 2796	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	Complaints registers covering the audit period have been obtained. No complaints have been received. Complaints records are being held in excess of the 4 year minimum.	Compliant	NA	NA
EPL 2796	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.	1.02	No request has been received.	Not triggered	NA	NA
EPL 2796	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, 14.04	A phone number is publicly available on the site website for Environment or Community Enquiries. The contact number is also advertised on the front gate of the Site.	Compliant	NA	NA
EPL 2796	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, 14.04	A phone number is publicly available on the site website for Environment or Community Enquiries. The contact number is also advertised on the front gate of the Site.	Compliant	NA	NA
EPL 2796	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.	1.01, 14.04	This date was passed in a previous audit period.	Not triggered	NA	NA
EPL 2796	Monitoring and Recording Conditions	M7.1	Blasting	To determine compliance with the blasting limits of this licence: a) Airblast overpressure and ground vibration levels must be measured and electronically recorded for monitoring points 2 and 3 for the parameters specified in Column 1 of the table below; and b) The licensee must use the units of measure, sampling method, and sample at the frequency specified opposite in the	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	All airblast overpressure and ground vibration levels are being recorded as per specified parameters.	Compliant	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Monitoring and Recording Conditions	M8.1	Noise monitoring	To assess compliance with the noise limits of this licence, attend noise monitoring must be undertaken in accordance with the conditions of this licence and: a) during a period of normal quarry operations; b) at each one of the noise monitoring locations listed in the noise limits table of this licence; c) occur once annually in the reporting period; and d) occur during the night period as defined in the NSW Noise Policy for Industry, and in conjunction with an asphalt campaign if any such campaign occurs within the quarterly monitoring period. <b>Note:</b> The extent and frequency of noise monitoring required by this licence will be reviewed upon request after eight quarterly monitoring campaigns.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	Noise monitoring generally complied with this requirement, but monitoring could not be conducted at point 13 due to refusal of access.	Non-compliant	NA	Holcim should review options for relocation of the monitoring location which will be updated in the Noise Management Plan. Holcim to seek approval for the updated monitoring location with DPHI and EPA.  The audit team is advised this process is already underway at the time of finalising this IEA.
EPL 2796	Monitoring and Recording Conditions	M8.2	Noise monitoring	Noise monitoring must be carried out in accordance with Australian Standard AS 2659.1 - 1998: Guide to the use of sound measuring equipment - Portable sound level metres and in accordance with any relevant factors provided in the NSW Noise Policy for Industry.	7.01, 7.02, 7.03, 8.01, 8.02, 8.03, 7.05	The Australian standard is referenced in the noise monitoring reports.	Compliant	NA	NA
EPL 2796	Reporting Conditions	R1.1	Annual return documents	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.	14.05, 8.05, 8.06, 8.07	Annual returns have been submitted as required during the audit period. A non compliance has been reported in each annual return.	Compliant	NA	NA
EPL 2796	Reporting Conditions	R1.2	Annual return documents	An Annual Return must be prepared in respect of each reporting period, except as provided below. <b>Note:</b> The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period.	14.05	Annual returns have been completed as required and submitted on time.	Compliant	NA	NA
EPL 2796	Reporting Conditions	R1.3	Annual return documents	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period. <b>Note:</b> An application to transfer a licence must be made in the approved form for this purpose.	1.02, 14.05	The licence was not transferred during the audit period.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R1.4	Annual return documents	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.	1.02, 14.05	The Licence was not surrendered or revoked during the audit period.	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Reporting Conditions	R1.5	Annual return documents	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	14.05	Annual returns have been completed as required and submitted on time.	Compliant	NA	NA
EPL 2796	Reporting Conditions	R1.6	Annual return documents	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	1.02, 14.05, 8.05, 8.06, 8.07	Annual returns are being retained in excess of the 4 year minimum period.	Compliant	NA	NA
EPL 2796	Reporting Conditions	R1.7	Annual return documents	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) by a person approved in writing by the EPA to sign on behalf of the licence holder.	1.02, 14.05, 8.05, 8.06, 8.07	Annual returns are signed by appropriate personnel of the company who have been delegated appropriate authority by company officeholders (i.e. CEO and General Counsel).	Compliant	NA	NA
EPL 2796	Reporting Conditions	R2	Notification of environmental harm.	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.	1.02	No incidents requiring notification occurred during the audit period.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R2.1	Notification of environmental harm.	Notifications must be made by telephoning the Environment Line service on 131 555.	1.02	No incidents requiring notification occurred during the audit period.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R2.2	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.	1.02	No incidents requiring notification occurred during the audit period.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R3.1	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.	1.02	No such requests have been made.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R3.2	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.	1.02	No such requests have been made.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R3.3	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.	1.02	No such requests have been made.	Not triggered	NA	NA
EPL 2796	Reporting Conditions	R3.4	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.	1.02	No such requests have been made.	Not triggered	NA	NA



Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or opportunity for improvement	Recommendation
EPL 2796	Other reporting conditions	R4.1	Noise Compliance Assessment Report	A noise compliance assessment report(s) must be submitted to the EPA with each Annual Return. The assessment must be prepared by a suitably qualified and experienced acoustical consultant and include: a) an assessment of compliance with noise limits detailed in the limit conditions of this licence; b) details of all quarrying activities that were occurring during each of the periods of monitoring, and c) an outline of any management actions taken within the monitoring period to address any exceedances of the limits detailed in the limit conditions of this licence.	1.02, 14.05, 8.05, 8.06, 8.07, 4.03	Anecdotal evidence suggests these reports are emailed directly to the EPA following submission of each annual return, as they cannot be uploaded into the econnect system along with an annual return. Documentary evidence has been provided for the 2024-25 year confirming it was submitted to the EPA and a follow up question was clarified.	Compliant	NA	NA
EPL 2796	Other reporting conditions	R4.2	Blast Monitoring Report	The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return: a) the date and time of the blast; b) the location of the blast on the premises; c) the blast monitoring results at each blast monitoring station; and d) an explanation for any missing blast monitoring results.	1.02, 14.05, 8.05, 8.06, 8.07	Anecdotal evidence suggests these reports are emailed directly to the EPA following submission of each annual return, as they cannot be uploaded into the econnect system along with an annual return. Documentary evidence regarding submission of the blasting reports was not provided to the audit team during this IEA.	Non-compliant	NA	Ensure that a Blast Monitoring Report is provided to the EPA with each Annual Return. Ensure documentary evidence is saved to file and made available for future IEAs.
EPL 2796	Other reporting conditions	R4.3	Blast Monitoring Report	The licensee must report any exceedance of the licence blasting limits to the EPA's Environment Line as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.	1.02	No records could be produced to demonstrate that the blasting exceedances during the audit period were reported to the NSW EPA as soon as practicable. They were reported via annual returns, but that pathway does not comply with this condition.	Non-compliant	NA	Notify NSW EPA as soon as practicable following any blast exceedance. Consider modifying internal procedures following exceedance to include Environment Line notification.
EPL 2796	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.	1.02, 1.01	Hard copy of the current licence sighted in the main office folder.	Compliant	NA	NA
EPL 2796	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.	1.02	No request has been received.	Not triggered	NA	NA
EPL 2796	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.	1.02, 1.01	Hard copy of the current licence sighted in the main office folder.	Compliant	NA	NA
EPL 2796	General Conditions	G2.1	Other general conditions	Completed Programs	1.02	Noted	Not triggered	NA	NA







## Rhys Thompson

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**From:** Rhys Thompson  
**Sent:** Tuesday, 24 June 2025 1:47 PM  
**To:** 'council@midcoast.nsw.gov.au'  
**Subject:** Independent Environmental Audit Consultation - DA231-10-99  
**Attachments:** Appointment of Experts\_10062025\_045051.pdf

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Jandra Quarry (DA231-10-99).

Our site inspection for this audit is scheduled to be undertaken prior to 13 July 2025.

Accordingly, we are approaching Mid-Coast Council to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

- Department of Planning, Housing and Infrastructure (DPHI)
- Mid-Coast Council – this email, and
- The NSW Environment Protection Authority (EPA)

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP  
General Manager



📞 0481 982 049  
✉️ rhys@4pillars.com.au  
🌐 www.4Pillars.com.au  
📍 Level 1, 5 George Street  
North Strathfield NSW 2137





## Rhys Thompson

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**From:** Rhys Thompson  
**Sent:** Tuesday, 24 June 2025 1:40 PM  
**To:** DPE PSVC Compliance Mailbox  
**Cc:** James Hammond  
**Subject:** Independent Environmental Audit Consultation - DA231-10-99  
**Attachments:** Appointment of Experts\_10062025\_045051.pdf

Attn: Heidi Watters

Hi Heidi,

As you are aware and per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Jandra Quarry (DA231-10-99).

Our site inspection for this audit is scheduled to be undertaken prior to 13 July 2025.

In accordance with the 2020 *Independent Audit – Post Approval Requirements* (IAPAR), we are approaching you to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit. Your input and guidance would be greatly appreciated in ensuring that all relevant compliance aspects associated with the project are thoroughly assessed.

At present, we intend to undertake consultation with the following parties:

- Department of Planning, Housing and Infrastructure (DPHI) – this email
- Mid-Coast Council, and
- The NSW EPA

If there are any parties or agencies further to the above that you suggest we should engage with, please let us know.

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP

General Manager



0481 982 049  
rhys@4pillars.com.au  
www.4Pillars.com.au  
Level 1, 5 George Street  
North Strathfield NSW 2137









## Rhys Thompson

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**From:** Rhys Thompson  
**Sent:** Tuesday, 24 June 2025 1:50 PM  
**To:** info@epa.nsw.gov.au  
**Subject:** Independent Environmental Audit Consultation - EPL2796  
**Attachments:** Appointment of Experts\_10062025\_045051.pdf

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Jandra Quarry (DA231-10-99), covered by EPL 2796.

Our site inspection for this audit is scheduled to be undertaken prior to 13 July 2025.

Accordingly, we are approaching the EPA to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

- Department of Planning, Housing and Infrastructure (DPHI)
- Mid-Coast Council
- The NSW Environment Protection Authority (EPA) – this email

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP  
General Manager



📞 0481 982 049  
✉ rhys@4pillars.com.au  
🌐 www.4Pillars.com.au  
📍 Level 1, 5 George Street  
North Strathfield NSW 2137





## Rhys Thompson

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**From:** Craig Wilkinson <Craig.Wilkinson@MidCoast.nsw.gov.au>  
**Sent:** Friday, 27 June 2025 4:33 PM  
**To:** Rhys Thompson  
**Cc:** Bruce Moore; Adam Matlawski  
**Subject:** RE: Independent Environmental Audit Consultation - DA231-10-99  
**Attachments:** 3604\_Jandra BRMP\_V2 (1).pdf

Hi Rhys,

Following on from my below email, I have circulated this to our internal teams for comments. So far I have had comments back from our Ecology team and Water Quality team. They have noted the following:

**Water Quality:** A review to ensure that there is appropriate monitoring of water quality for water leaving the site. This would be applicable for all stages of the works, construction phase, operational phase and rehabilitation phase. Implementation and monitoring of erosion and sediment control measures to assist in water quality matters should be investigated. It is also advisable to ensure that the site is not polluting the environment and there are adequate controls and monitoring in place.

**Ecology:** Council requires an update on the implementation of the attached Biodiversity & Rehabilitation Management Plan particularly details on the agreed location and long-term land conservation mechanism for the required Biodiversity Offset Area, which was not finalised at the time the Plan was approved.

At this stage, I am still waiting on some comments from our Environmental Health team, but wanted to get these comments through to you as a priority.

I will pass on any other comments I receive.

Regards,  
Craig.

Craig Wilkinson | Senior Development Planner

Direct +612 7955 7576

Email [Craig.Wilkinson@MidCoast.nsw.gov.au](mailto:Craig.Wilkinson@MidCoast.nsw.gov.au) | [midcoast.nsw.gov.au](http://midcoast.nsw.gov.au)







*We acknowledge the traditional custodians of the land on which we work and live, the Gathang-speaking people and pay our respects to all Aboriginal and Torres Strait Islander people who now reside in the MidCoast Council area. We extend our respect to Elders past and present, and to all future cultural-knowledge holders.*

**From:** Craig Wilkinson <Craig.Wilkinson@MidCoast.nsw.gov.au>  
**Sent:** Wednesday, 25 June 2025 7:53 AM  
**To:** Rhys Thompson <Rhys@4pillars.com.au>  
**Cc:** Bruce Moore <Bruce.Moore@MidCoast.nsw.gov.au>; Adam Matlawski <Adam.Matlawski@MidCoast.nsw.gov.au>  
**Subject:** RE: Independent Environmental Audit Consultation - DA231-10-99

Hi Rhys,

Thank you for the email. I have circulated the email to our internal teams (ecology, environmental health and water quality) for additional comments.

They may reach out to you directly for further information or to provide comments, however I have requested that they provide comments to myself and I can collate and send through.

Let me know if there are any issues or if you need to discuss anything further.

Regards,  
Craig.

Craig Wilkinson | Senior Development Planner

Direct +612 7955 7576  
Email [Craig.Wilkinson@MidCoast.nsw.gov.au](mailto:Craig.Wilkinson@MidCoast.nsw.gov.au) | [midcoast.nsw.gov.au](http://midcoast.nsw.gov.au)





# FLOOD RECOVERY HELP

Visit our Recovery Hub for support, updates,  
and assistance after the recent flooding.



*We acknowledge the traditional custodians of the land on which we work and live, the Gathang-speaking people and pay our respects to all Aboriginal and Torres Strait Islander people who now reside in the MidCoast Council area. We extend our respect to Elders past and present, and to all future cultural-knowledge holders.*

---

**From:** Rhys Thompson <[Rhys@4pillars.com.au](mailto:Rhys@4pillars.com.au)>

**Sent:** Tuesday, 24 June 2025 1:47 PM

**To:** MidCoast Council <[council@midcoast.nsw.gov.au](mailto:council@midcoast.nsw.gov.au)>

**Subject:** Independent Environmental Audit Consultation - DA231-10-99

This is the first time you received an email from this sender ([Rhys@4pillars.com.au](mailto:Rhys@4pillars.com.au)). Exercise caution when clicking links, opening attachments or taking further action, before validating its authenticity.

Your attachment(s) were cleaned by Check Point Sandblast Threat Extraction.

[Click here](#) to restore the original(s) or contact your system administrator.

You may be required to authenticate, in that case follow these instructions:

1. You will be directed to a page where you would be requested to specify your email address.
2. An email with verification code will be sent to you.
3. Copy the code and return to the attachment recovery page.
4. The email with original attachments will be released to your mailbox.

**Please exercise discretion when requesting to release suspicious attachments.**

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Jandra Quarry (DA231-10-99).

Our site inspection for this audit is scheduled to be undertaken prior to 13 July 2025.

Accordingly, we are approaching Mid-Coast Council to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

- Department of Planning, Housing and Infrastructure (DPHI)
- Mid-Coast Council – this email, and
- The NSW Environment Protection Authority (EPA)



We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP

General Manager



0481 982 049  
rhys@4pillars.com.au  
www.4Pillars.com.au  
Level 1, 5 George Street  
North Strathfield NSW 2137





## Rhys Thompson

---

**From:** Daniel Trotter <daniel.trotter@epa.nsw.gov.au>  
**Sent:** Friday, 25 July 2025 3:32 PM  
**To:** Rhys Thompson  
**Subject:** RE: Independent Environmental Audit Consultation - EPL2796

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Rhys Thompson  
4 Pillars Environmental Consulting  
Level 1, 5 George Street  
NORTH STRATHFIELD NSW 2137

By email: rhys@4pillars.com.au

### **Response to request for consultation as part of Independent Environmental Audit – DA231-10-99**

Dear Rhys

Sorry for the delay in responding to you. I refer to your email dated 24 June 2025 to the Environment Protection Authority (EPA) requesting consultation as part of an Independent Environmental Audit for Holcim (Australia) Pty Ltd as conditioned in DA231-10-99. The EPA regulates this premises referred to as Jandra Quarry located at 15312 Pacific Highway POSSUM BRUSH as part of the issued Environment Protection Licence 2796 (the Licence).

The EPA encourages the preparation of audits as useful tools for industry to determine how to meet statutory obligations and identify potential and actual environmental risks. As a regulatory authority, the EPA administers and regulates statutes for environmental management and protection. However, the EPA is not directly involved in carrying out audits and does not review or comment on such documents.

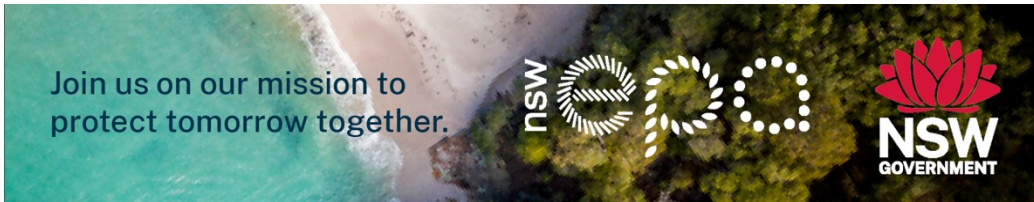
As a result, the EPA has no comment to provide for this request but directs you to the EPA's public register at <https://apps.epa.nsw.gov.au/prpoeoapp/> to view the Licence and associated notices.

If you have any further questions about this matter, please contact the EPA via email at [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au), cc [daniel.trotter@epa.nsw.gov.au](mailto:daniel.trotter@epa.nsw.gov.au).

Regards

**Daniel Trotter**  
Operations Officer  
North Coast - Operations  
NSW Environment Protection Authority  
T 02 5534 3007 | E [daniel.trotter@epa.nsw.gov.au](mailto:daniel.trotter@epa.nsw.gov.au) | [www.epa.nsw.gov.au](http://www.epa.nsw.gov.au)





The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

I work on Biripi Country

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

---

**From:** Rhys Thompson [rhys@4pillars.com.au]  
**Sent:** 24/06/2025 1:50 PM  
**To:** [info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)  
**Subject:** Independent Environmental Audit Consultation - EPL2796

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Jandra Quarry (DA231-10-99), covered by EPL 2796.

Our site inspection for this audit is scheduled to be undertaken prior to 13 July 2025.

Accordingly, we are approaching the EPA to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

1. Department of Planning, Housing and Infrastructure (DPHI)
2. Mid-Coast Council
3. The NSW Environment Protection Authority (EPA) – this email

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

**Rhys Thompson CEnvP**

General Manager





0481 982 049  
rhys@4pillars.com.au  
www.4Pillars.com.au  
Level 1, 5 George Street  
North Strathfield NSW 2137



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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

If you are not the intended recipient, please notify the sender and then delete it immediately.

Any views expressed in this email are those of the individual sender except where the sender expressly and with authority states them to be the views of the NSW Department of Climate Change, Energy, the Environment and Water.

PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL



ref:!00D7F06iTix.!500Mn0vPmrp:ref

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This email is intended for the addressee(s) named and may contain confidential and/or privileged information.

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL







A photograph of a quarry face, showing a steep, layered rock wall. The rock is dark grey and has distinct horizontal strata. Sparse green vegetation is visible on the upper parts of the cliff. A yellow excavator is partially visible on the left side of the quarry face. The sky is clear and blue. A semi-transparent black text box is overlaid on the lower half of the image.

# **Jandra Quarry Independent Audit 7/7/2025, 10:36 am**

**DA231-10-99**

**Monday, 7 July 2025**

**Prepared For Holcim**





Photo 1 Flammable Liquid Chemical Storage



Photo 2 Gas Tanks - Chained And Secured



Photo 3 Bunded - Diesel And Pre-coating Tanks





Photo 4 Site Haul Road - Stabilised And Sealed



Photo 5 Wheel Wash Prior to exit And Weigh Bridge



Photo 6 Secured Gate - Previously asphalt Operation Area





Photo 7. Site Entrance With Secured Gates



Photo 8. Discharge point - EPA Licensed Point  
With marker/signage.



Photo 9. Traffic And Speed Signage





Photo 10. Operations Area

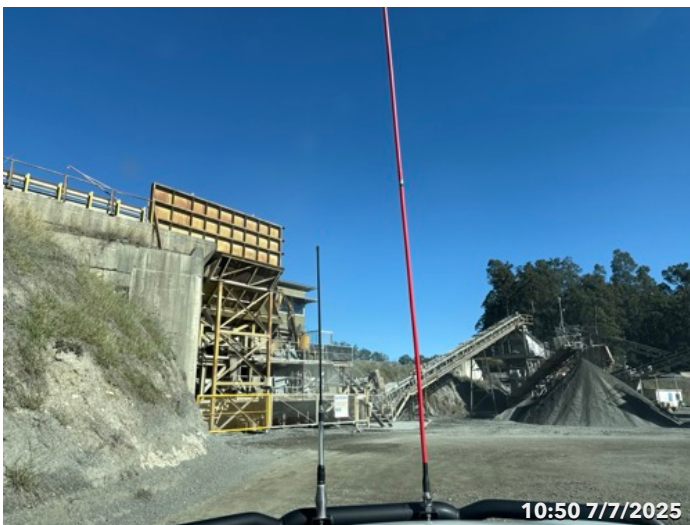


Photo 11. Crushing Machine



Photo 12. Processed Water Drain





Photo 13 The Pit



Photo 14. Water Cart In Action

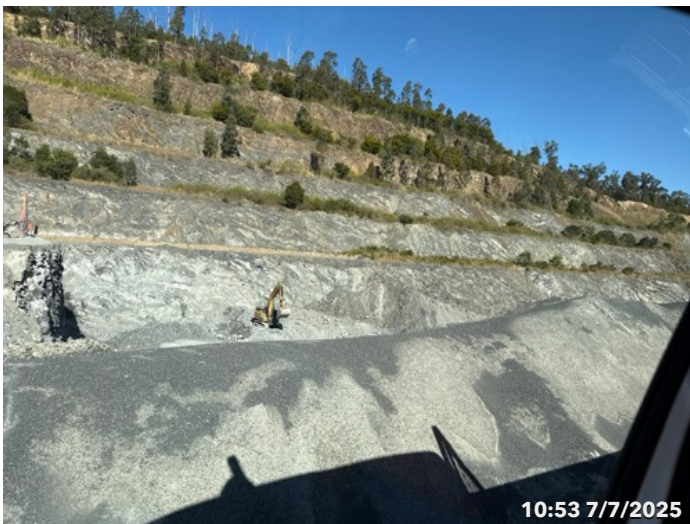


Photo 15. Excavator At the Pit





Photo 16 Drilling For The Next Blast



Photo 17 Concrete Waste Stockpile -  
Store Away From Waterways  
Allowed only 3000 tons per year



Photo 18 Settling Ponds





Photo 19 Silt Removed From The Dam



Photo 20 Over Burden Area



Photo 21 Rehabilitation Benches - Trees  
We're Planted





Photo 22 Precoate Mill



Photo 23 Spill Kits Were Available At Point Of Use



Photo 24 Bunded Area With Oil And Water Separator





Photo 25 Bunded IBC Storage



Photo 26 Oil And Water Separator



Photo 27 Bunded Diesel Tanks And Pre-coate Tank





Photo 28 Spill Containment Area



Photo 29 Processing Dam

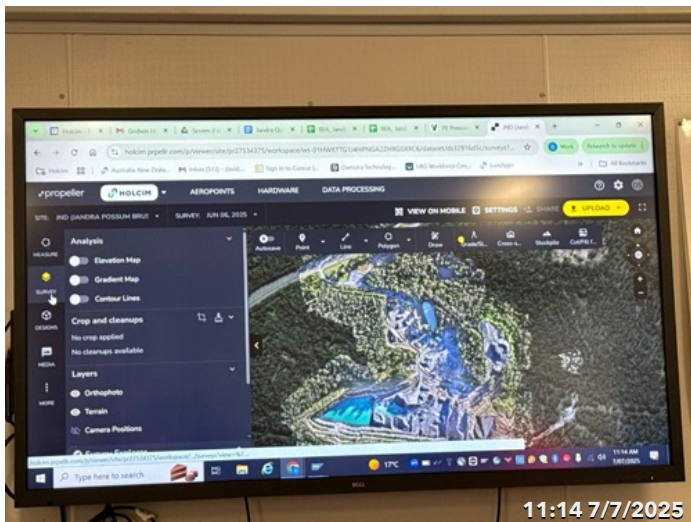


Photo 30 Propeller System Used For Monitoring The Actual Level And Boundary Surveys



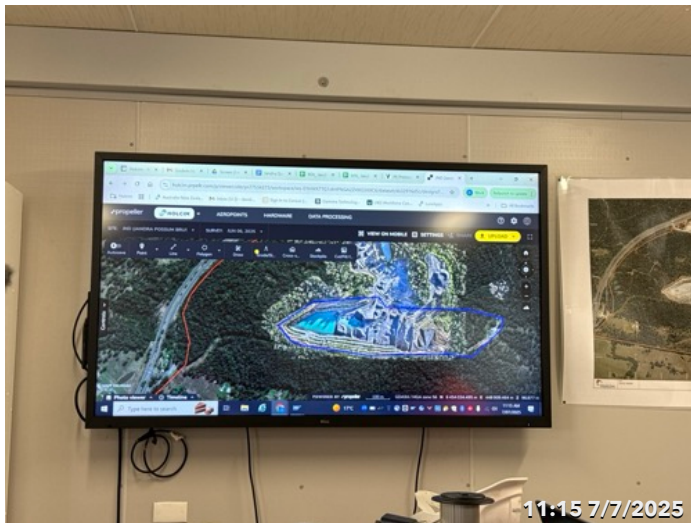


Photo 31 Extraction Boundary - Blue Marker

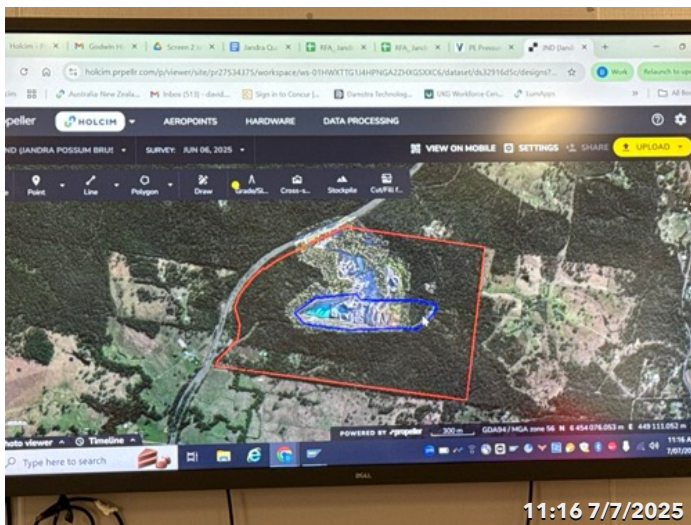


Photo 32 Red Line - Property Boundary



Photo 33 Traffic Control map





Photo 34 Boundary Marker



Photo 35 Dust Sentry pro



Photo 35 Abandoned Managers House  
Nearing the blasting area





Photo 36 Aboriginal Item Marker - J16



Photo 37 Weather Station

Annabelle Tungol - Lead Auditor  
4Pillars



## 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. However, if DPHI is not satisfied with this presentation of the data in the audit table, we will gladly amend the audit table and we welcome DPHI feedback on that point.

This is a decision that has been taken by 4Pillars and is not a decision of the Proponent. The Lead Auditor has noted DPHI's preference and 4Pillars has requested the opportunity to trial this approach and gauge DPHI's position on it. We found it to be a very helpful approach from an audit process perspective and we believe it greatly reduces the risk of transcription error and ultimately improves the precision of this audit report and the information available for DPHI to use for verification purposes.

### *The evidence file*

The Evidence File is provided as a OneDrive folder. Specific recipients have been provided access to this folder. Other recipients can be added on request. Please contact [hello@4Pillars.com.au](mailto:hello@4Pillars.com.au) or visit [www.4Pillars.com.au](http://www.4Pillars.com.au) for alternative contact details.

Evidence File Link: [CLICK HERE](#)

### INDEX TABLE

Exhibit ID	Description
<b>1.00</b>	<b>Documents from site inspection</b>
1.01	Collated photographic record of inspection 7/7/2025
1.02	File Note - Audit interview 7/7/2025
1.03	Front gate - environmental complaints and hazchem signage
1.04	Weather station
<b>2.00</b>	<b>Surveys, maps and site plans</b>
2.01	Nearmap image dated 4/6/2022
2.02	Nearmap image dated 4/2/2023
2.03	Nearmap image dated 10/8/2024
2.04	Nearmap image dated 23/2/2025
2.03	Propeller screen grab showing current pit floor at RL 20.39 m
<b>3.00</b>	<b>Records, inspections, operational data</b>
3.01	Truck movement summary - 2022
3.02	Truck movement summary - 2023
3.03	Truck movement summary - 2024
3.04	Collated maintenance and inspection forms - crushing plant inspection form, fixed plant pre-start, control room maintenance list, repair list.
3.05	Collated concrete waste received 2022-2025
3.06	Environmental permit to work dated 12/01/2024 for vegetation clearing works. Approved on 6/2/2024
3.07	Truck movement summary - 2025 YTD
3.08	SHE Schedule for Jandra quarry 2025 YTD
3.09	Email showing ticket (reference) numbers for Mineral Return submissions 2025
<b>4.00</b>	<b>Correspondence with regulatory agencies</b>
4.01	Letter to DPE regarding review of management plans following 2022 AEMR and 2022 IEA
4.02	Letter to DPE regarding review of management plans following 2023 AEMR
4.03	Email regarding submission of 2024-2025 annual noise assessment report alongside annual return.
<b>5.00</b>	<b>Bonds and financial documents</b>
5.01	Departmental record confirming lodgement of Rehabilitation bond for Condition 28 of the Consent. Dated 27/7/2023
<b>6.00</b>	<b>Planning agreements, legal instruments and contracts</b>
<b>7.00</b>	<b>Environmental Monitoring Reports and Data</b>
7.01	Annual Noise monitoring Assessment 29/3/2022
7.02	Annual Noise monitoring Assessment 06/2023
7.03	2025 YTD monitoring summary, air, noise, blasting
7.04	Collated blast monitoring data 2024 and 2025



Exhibit ID	Description
7.05	Annual Noise monitoring assessment 3/2025
7.06	Surface water discharge monitoring 2025 YTD
7.07	Vegetation pre-clearance inspection report - 20/2/2024
7.08	Excerpt output of the on-site weather station from 10-17 March 2025
7.09	2025 YTD particulate monitoring data from HVS
<b>8.00</b>	<b>Reports to regulatory authorities</b>
8.01	Annual Review - 2022 dated 31/03/2023
8.02	Annual Review - 2023 dated 28/03/2024
8.03	Annual Review - 2024 dated 27/03/2025
8.04	Internal spreadsheet for Resources Regulator annual return
8.05	2022-2023 EPL Annual Return
8.06	2023-24 EPL Annual Return
8.07	2024-25 EPL Annual Return
<b>9.00</b>	<b>Complaints and stakeholder management</b>
9.01	Complaints register 2022
9.02	Complaints register 2023
9.03	Complaints register 2024
9.04	Complaints register 2025 Q1
<b>10.00</b>	<b>Management Plans</b>
10.01	Noise and Blast Management Plan rev D dated 20/8/2018
10.02	Aboriginal Cultural Heritage Management Plan Rev C(?) Final Draft dated 31/8/2015
10.03	Air Quality Management Plan Version 2 dated 11/2021
10.04	Biodiversity and Rehabilitation Management Plan Final V5 dated 20/8/2018
10.05	Environmental Management Strategy UNDATED
10.06	Soil and Water Management Plan UNDATED
10.07	Pollution Incident Response Management Plan Revision 11 dated 11/2024
10.08	Department approval of Air Quality Management Plan Version 2
<b>11.00</b>	<b>Penalties, Fines or Notices</b>
11.01	Official caution from DPHI dated 13/3/2025 - sighted only, copy not obtained
<b>12.00</b>	<b>Environmental Impact Assessment documents</b>
12.01	MOD 5 Environmental Assessment main report
<b>13.00</b>	<b>Previous audits</b>
13.01	2016 IEA Report
13.02	2019 IEA Report
13.03	2022 IEA Report
13.04	DPE receipt of 2022 IEA dated 3/8/2023.
<b>14.00</b>	<b>Miscellaneous documents</b>
14.01	Excerpt from Encompass mining solutions report - Geotechnical Design Sheet showing design quarry depth of RL 20 m AHD.
14.02	Jandra quarry truck driver induction
14.03	Jandra general induction
14.04	Jandra Holcim webpage extracted 18/8/2025
14.05	POEO Summary Page - EPL
14.06	AMMANN Australia SWMS for decommissioning of the Downer asphalt plant
14.07	Holcim corporate web page Net Zero journey
<b>15.00</b>	<b>Not used</b>



## Jandra Quarry – 2025 IEA

### Response to Audit Recommendations

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail	Proponent's response
DA 231-10-99 MOD 5							
<b>Schedule 3 Condition 5</b>	The Applicant shall ensure that blasting on site does not cause any exceedance of the criteria in Table 4. However, these criteria do not apply if the Applicant has a written agreement with the relevant owner to exceed the limits in Table 4, and the Applicant has advised the Department in writing of the terms of this agreement.	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	<p>Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal.</p> <p>Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation sequence and/or offset delay being too small.</p> <p>Exceedance on 28 April 2023 of 6.1 mm/sec at R2 (reported to EPA and DPHI). On 10 May 2023 Holcim provided an additional Blast Exceedance Result Report to the Department as per Schedule 5 Condition 6 of the development consent. The finding of this report determined that the use of soil spikes likely lead to unreliable results. This result was then excluded from maximum values going forward.</p> <p>No exceedances from 2024 and 2025.</p> <p>DPHI issued an official caution in March 2025 for failure to report the exceedances in 2023.</p>	Non-compliant	Recommendation 1.	Continue monitoring blasts and follow blasting contractor recommendations for location of blast holes and sequence timing. Continue monitoring and if further exceedances occur, consider the need to modify blasting methodology.	Holcim to continue blasting in accordance to schedule 3, condition 5 and will ensure to follow best practice. Any exceedances will follow through investigation and relevant authorities notified.
<b>Schedule 3 Condition 14</b>	<p>The Applicant shall prepare and implement an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:</p> <p>(a) be submitted to the Secretary for approval by 31 August 2015;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> <li>• compliance with the relevant conditions of this consent;</li> <li>• best practice management is employed; and</li> <li>• the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;</li> </ul> <p>(c) describe the proposed air quality management system; and</p> <p>(d) include an air quality monitoring program that:</p> <ul style="list-style-type: none"> <li>• is capable of evaluating the performance of the development;</li> <li>• includes a protocol for determining any exceedances of the relevant conditions of consent;</li> <li>• effectively supports the air quality management system; and</li> <li>• evaluates and reports on the adequacy of the air quality management system.</li> </ul>	8.01, 8.02, 8.03, 7.09, 10.08	<p>Activities are operated in accordance with the Air Quality Management Plan (AQMP) Version 2 (November 2021).</p> <p>Submission date outside of this audit period and Departmental approval of the AQMP has been sighted dated 1 March 2022.</p> <p>Section 15 of the AQMP notes that Version 1 was updated in October 2016 for the Mod 5 Modification.</p> <p>a) 2016 IEA marks as compliant "Sighted letter of submission to the Secretary of DP&amp;E dated 31 August 2015". DPE approved Version 2 of the AQMP in 1/3/2022.</p> <p>b) Sections 3 and 7 describe the measures to be implemented.</p> <p>c) Section 9 details the procedures for evaluating the results, notifying exceedances, external reporting etc. Section 10 and Table 13 detail the actions to be taken dependent on monitoring results.</p> <p>d) The air quality monitoring program is detailed in Section 8, with locations shown in Figure 1.</p> <p>Implementation not fully complied with due to monitoring gap due to equipment failure in data 2024. Self-reported non-compliance. This was reported in late 2024 once the failure and inability to obtain data had crystallised. As the continuous air quality nephelometer is the only monitoring device for PM10 and TSP, for a 2 month period, the Site was not able to effectively evaluate the performance of the development or determine whether exceedances occurred.</p>	Non-compliant	Recommendation 2.	<p>The Proponent must implement a procedure whereby any breakdown or failure of the continuous monitoring device is checked on a weekly basis at a minimum.</p> <p>A contingency must be in place so that any equipment breakdown can be rectified, either with a replacement monitoring device or similar action.</p>	Broken equipment, replaced. Holcim to complete routine checks on equipment and weekly review of data to mitigate any gaps.
<b>Schedule 3 Condition 28</b>	<p>Within 3 months of each independent Environmental Audit (see condition 8 of Schedule 5), the Applicant shall review, and if necessary revise, the sum of the Rehabilitation and Conservation Bond to the satisfaction of the Secretary. This review must consider the:</p> <p>(a) effects of inflation;</p> <p>(b) likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development) and implementing the biodiversity offset strategy; and</p>	13.03, 5.01	<p>The 2022 IEA was submitted on 27/3/2023. There is a record of a bond update being submitted on 27/7/2023, four months after the latest date that could be considered 'completion' of the 2022 IEA.</p>	Non-compliant	Recommendation 3.	<p>Within 3 months of the next IEA, Proponent may seek an extension of time from the Department to submit the review, due to the amount of time necessary to prepare it.</p>	Holcim to ensure the bond review and submission triggered by this IEA will be submitted to the DPHI on time. Any delays, Holcim will seek extension as recommended.



Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail	Proponent's response
	(c) performance of the implementation of the rehabilitation of the site and the biodiversity offset strategy to date.						
<b>Schedule 5 Condition 2</b>	<p>The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria and/or performance measures has occurred, the Applicant shall, at the earliest opportunity:</p> <p>(a) take all reasonable and feasible measures to ensure that the exceedance ceases and does not recur,</p> <p>(b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and</p> <p>(c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.</p>	1.01, 1.02, 9.02	<p>The audit team concludes that, on the few occasions where exceedances of site criteria have occurred (or other issues, such as equipment failure) have occurred, the Proponent has taken appropriate steps to rectify the issue and made reasonable efforts to prevent future non-compliance.</p> <p>In terms of compliance with requirement (b) regarding notification of the Department 'at the earliest opportunity', the Department issued an official caution in March 2025 for failure to report the blasting exceedances in 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasting overpressure limit had crystallised, a precautionary notification should have been made to the Department. The exceedances were discussed in the 2023 AEMR submitted in Q2 2024, but the AEMR is not considered an appropriate vehicle for notification of individual exceedances.</p>	Non-compliant	Recommendation 4.	<p>The Proponent is to assess its internal procedures for the identification and notification of exceedances of environmental performance criteria, to ensure they are fit for purpose.</p> <p>Notifications of exceedances should occur, regardless of whether the Proponent disputes the veracity of the exceedance.</p> <p>Any dispute or mitigating circumstances can simply be discussed in the notification.</p>	<p>Noted. Holcim has systems to notify of any exceedances – this includes the ArcGis electronic dashboards and monitoring sheets. Holcim to notify relevant authorities of all exceedances.</p>
<b>Schedule 5 Condition 6</b>	<p>The Applicant shall notify, at the earliest opportunity, the Secretary and any other relevant agencies of any incident that has caused, or threatens to cause, material harm to the environment. For any other incident associated with the development, the Applicant shall notify the Secretary and any other relevant agencies as soon as practicable after the Applicant becomes aware of the incident. Within 7 days of the date of the incident, the Applicant shall provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested.</p>	1.02, 8.02, 8.03	<p>There were no incidents within audit period that caused material harm and no notifications of that type were required.</p> <p>Dust Sentry Pro sensor failed. 6 day dust results - did not cause material harm, but still required notification. The data was not available from 28 June 2024 and 13 Sep 2024. Notification was made to the Department 19 September 2024.</p> <p>Proponent was advised by the consultant that the data was retrievable, but this was not the case.</p> <p>This notification complied with the requirement to notify as soon as practicable.</p> <p>An official caution was received in March 2025 for failure to notify exceedances of overblast pressure in April and June 2023. Although the Proponent does not necessarily accept those exceedances, at a minimum, the audit team considers that following the end of 2023 when the exceedance of the 5% blasting overpressure limit had crystallised, a precautionary notification should have been made to the Department.</p>	Non-compliant	NA	Refer to Recommendation 4.	As above
<b>Schedule 5 Condition 9</b>	<p>Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</p>	13.03, 13.04	<p>Department approval of the audit team was received on 27 June 2022, three months since this date is 27 September 2022, which is taken as the due date for submission. Final Report v1.0 is dated 2 March 2023, outside of the due date. Submission date was 27/3/2023 as confirmed in correspondence from the Department dated 3/8/2023.</p> <p>This condition was not complied with for the 2022 audit, the submission deadline for which fell within this audit period. We note that due to the date on the 2022 IEA audit report, the Consultant engaged did not provide the report in a timely manner to allow the Proponent to comply with this condition.</p>	Non-compliant	Recommendation 5.	<p>Future IEAs to be prepared and submitted within the 3 month timeframe, or the audit team is to write to the Department and seek an extension, setting out the reasons as to why an extension should be granted.</p>	<p>Holcim has implemented an audit register to track and plan audits. All future audits will be submitted on time per this condition.</p>
<b>EPL 2796</b>							
<b>L5.2</b>	<p>The airblast overpressure level from blasting operations in or on the premises must not exceed: 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; at either monitoring point 2 or 3 of this licence.</p>	7.04, 8.03, 8.04, 8.02, 8.07, 7.04, 8.03, 8.04, 8.02, 8.05	<p>Current production requires 1-2 blasts a month, more often 1 per month. Monitoring is conducted for all blasts. All is centralised through the BlastIQ portal.</p> <p>Exceedance on 6 June 2023 of 115.4 dB overblast pressure (6.25% of total blasts exceeds 5% threshold). This non-compliance was noted in an Overpressure Investigation Report (Orica 2023) which concluded that the result was due to the pressure generated by multiple face holes firing in close succession due to the V initiation sequence and/or offset delay being too small.</p> <p>No exceedances from 2024 and 2025.</p>	Non-compliant	Recommendation 6.	<p>Continue monitoring blasts and follow blasting contractor recommendations for location of blast holes and sequence timing.</p> <p>Continue monitoring and if further exceedances occur, consider the need to modify blasting methodology.</p>	<p>Holcim to continue blasting in accordance to schedule 3, condition 5 and will ensure to follow best practice. Any exceedances will follow through investigation and relevant authorities notified.</p>
<b>M8.1</b>	<p>To assess compliance with the noise limits of this licence, attend noise monitoring must be undertaken in accordance</p>	7.01, 7.02, 7.03, 8.01,	Noise monitoring generally complied with this requirement, but monitoring could not be conducted at point 13 due to refusal of access.	Non-compliant	Recommendation 7.	<p>Holcim should review options for relocation of the monitoring</p>	<p>Alternative location has been identified. Holcim has submitted</p>



Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation	Recommendation detail	Proponent's response
	<p>with the conditions of this licence and:</p> <p>a) during a period of normal quarry operations;</p> <p>b) at each one of the noise monitoring locations listed in the noise limits table of this licence;</p> <p>c) occur once annually in the reporting period; and</p> <p>d) occur during the night period as defined in the NSW Noise Policy for Industry, and in conjunction with an asphalt campaign if any such campaign occurs within the quarterly monitoring period.</p> <p><b>Note:</b> The extent and frequency of noise monitoring required by this licence will be reviewed upon request after eight quarterly monitoring campaigns.</p>	8.02, 8.03, 7.05				<p>location which will be updated in the Noise Management Plan. Holcim to seek approval for the updated monitoring location with DPHI and EPA.</p> <p>The audit team is advised this process is already underway at the time of finalising this IEA.</p>	revised NBMP to the DPHI for approval following consultations with EPA.
<b>R4.2</b>	<p>The licensee must supply, with each Annual Return, a Blast Monitoring Report which must include the following information relating to each blast carried out within the premises during the reporting period covered by the Annual Return:</p> <p>a) the date and time of the blast;</p> <p>b) the location of the blast on the premises;</p> <p>c) the blast monitoring results at each blast monitoring station; and</p> <p>d) an explanation for any missing blast monitoring results.</p>	1.02, 14.05, 8.05, 8.06, 8.07	<p>"Anecdotal evidence suggests these reports are emailed directly to the EPA following submission of each annual return, as they cannot be uploaded into the econnect system along with an annual return.</p> <p>Documentary evidence regarding submission of the blasting reports was not provided to the audit team during this IEA."</p>	Non-compliant	Recommendation 8.	Ensure that a Blast Monitoring Report is provided to the EPA with each Annual Return. Ensure documentary evidence is saved to file and made available for future IEAs.	Noted. Holcim to submit blast report to the EPA on each annual return.
<b>R4.3</b>	The licensee must report any exceedance of the licence blasting limits to the EPA's Environment Line as soon as practicable after the exceedance becomes known to the licensee or to one of the licensee's employees or agents.	1.02	No records could be produced to demonstrate that the blasting exceedances during the audit period were reported to the NSW EPA as soon as practicable. They were reported via annual returns, but that pathway does not comply with this condition.	Non-compliant	NA	Refer to Recommendation 4.	Holcim to continue blasting in accordance to schedule 3, condition 5 and will ensure to follow best practice. Any exceedances will follow through investigation and relevant authorities notified.