

Document	Consultant	Item #	Nonconformance/Opportunity for improvement	Recommendation description	Comments by Holcim	Status
2022 EMP Audit	Envirorisk Management	1	Opportunity for improvement	All new employees be provided with an overview summary of the important elements of the EMP and its origin from the legislated EES process, in lieu of the full induction at a later date.	EMP overview to be converted into a Work Procedure	In-progress
2022 EMP Audit	Envirorisk Management	2	Opportunity for improvement	Consider converting the Compliance Planner into (or replacing it with) a more interactive real time software platform that shows the status of compliance at any given time, automatic reminders sent to key personnel, overdue notices, etc.	Considered not viable at this stage. Will continue to adopt as business introduces new technology platforms.	Complete
2022 EMP Audit	Envirorisk Management	3	Opportunity for improvement	A potential contributing factor to the elevated pH of the surface water discharge is run-off from the cement mixing area. Where measured discharge pH is consistently above 8 this should be investigated further and measures put in place to mitigate the impact if it is found to be significant.	Internal testing has indicated that cement mixing area is not a significant contributor to pH of the surface water.	Complete
2022 EMP Audit	Envirorisk Management	4	Opportunity for improvement	Develop clear instructions on how to check dam/pit water for the presence of toxic algae during the weekly inspections. If toxic algae are suspected, waters need to be sampled and sent for laboratory analysis.	Water colour especially in-pit appears to be reflective of fines/mineral content, not algae presence. Eurofins sampled the two pit water storage location and Donnazans dam 26/7/22. Results were that "Current levels are unlikely to influence water quality."	Complete
2022 EMP Audit	Envirorisk Management	5	Opportunity for improvement	Holcim should implement the recommendations of the AECOM Groundwater and Spring Review letter report of 3/3/22.	Agreed	In-progress
2022 EMP Audit	Envirorisk Management	6	Opportunity for improvement	Consideration of a peer review (by an agreed independent hydrogeologist) of the spring water report be revisited should concern continue to be raised by neighbours following the winter period.	Discussions as per ERC meeting minutes.	In-progress
2022 EMP Audit	Envirorisk Management	7	Opportunity for improvement	The recommendations of the AECOM report dated 2/12/21 should be implemented where applicable to land under Holcim's control.	See Mt. Shamrock Quarry - Toomuc Valley Slope Inspection, December 2021 section of this list	In-progress
2022 EMP Audit	Envirorisk Management	8	Opportunity for improvement	Relocate a larger version of the 7am truck arrival warning sign to the left hand side of Mt Shamrock Road.	Council Request - CR22290410. Requested with the council that the sign be relocated. Council said that the sign was not permitted on Mount Shamrock road and removed it	Complete
2022 EMP Audit	Envirorisk Management	9	Opportunity for improvement	Reinstate the sign at the southern gate of the larger NGO site.	Agreed	In-progress
2022 EMP Audit	Envirorisk Management	10	Opportunity for improvement	An additional clear label should be fixed above the oil drum collection bin identifying its correct contents (e.g. "Chemical Containers (Reportable Priority Waste)").	Agreed	In-progress
2022 EMP Audit	Envirorisk Management	11	Opportunity for improvement	Provide site personnel awareness training (including penalties for non-compliance) regarding priority waste, reportable priority waste, and the new EPA requirements for correct segregation, storage and disposal from the site .	Penalties to be included in the "EMP Overview" Work Procedure	In-progress
2022 EMP Audit	Envirorisk Management	12	Opportunity for improvement	The spill kit in blue barrel at main quarry pit, and the kit at the crusher plant, should be checked for complete contents.	Agreed	Complete
2022 EMP Audit	Envirorisk Management	13	Opportunity for improvement	Investigate with the owner of the on-site electrical transformer unit regarding its polychlorinated biphenyls (PCB) status. If residual PCBs are present a clean up of leaked oil will likely be required.	New transformer has been ordered by Ausnet and will be replaced	In-progress
2022 EMP Audit	Envirorisk Management	14	Opportunity for improvement	Include provision in the Weekly Inspection pro forma for entering piezo gauging results from Donazzan's Dam.	Agreed	Complete
2022 EMP Audit	Envirorisk Management	15	Opportunity for improvement	Naturelinks to include electronic confirmation of inspection via their in-house app for each occasion that their vehicles go on site.	Agreed	Complete
2022 EMP Audit	Envirorisk Management	16	Opportunity for improvement	Naturelinks to undertake a risk assessment of weed seed transfer via vehicles/equipment accessing the Holcim site and NGO areas for all works. Controls will include limiting the areas vehicles can go, dry cleaning equipment before leaving site, and if necessary cleaning vehicles at site workshop area with pressure equipment, with details of cleaning events logged in field notes diary or similar.	Included in the 2021/22 Rehabilitation report	Complete
2022 EMP Audit	Envirorisk Management	17	Opportunity for improvement	An area of pampas grass was noted adjacent to the main quarry pit. This should be treated if reasonably practical and in a way that avoids water contamination.	No safe way to spray this area of pampas grass.	Complete
2022 EMP Audit	Envirorisk Management	18	Opportunity for improvement	Seek clarification from Naturelinks that at all times only properly trained and currently licensed personnel undertake herbicide application activities at the site.		Complete
2021/22 Rehabilitation Report	Naturelinks	1	Opportunity for improvement	South-East Extraction Area - Herbicide application targeting Pigeon Grass in early summer	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	2	Opportunity for improvement	South-East Extraction Area - Continued herbicide application to Chilean needle grass	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	3	Opportunity for improvement	South-East Extraction Area - Continued slashing and selective herbicide application to perennial exotic grasses	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	4	Opportunity for improvement	South-East Extraction Area - Maintain broadleaf-selective herbicide application	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	5	Opportunity for improvement	South-East Extraction Area - Plantings of dry-tolerant mid and lower story species to increase diversity across the site (Table 1.)	Agreed	Complete
2021/22 Rehabilitation Report	Naturelinks	6	Opportunity for improvement	Southern Extraction Area- Continue targeting of Phalaris aquatica via slashing and follow up herbicide application in 2022 to encourage native germination.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	7	Opportunity for improvement	Southern Extraction Area - Plant more drought tolerant species, including Hakea ulicina and Hakea decurrens ssp. physocarpa.	Agreed	Complete
2021/22 Rehabilitation Report	Naturelinks	8	Opportunity for improvement	Southern Extraction Area - Continual management of broad-leaf exotic species with selective herbicide application.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	9	Opportunity for improvement	Southern Extraction Area - Continual management of Chilean needle grass via herbicide application.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	10	Opportunity for improvement	Southern Extraction Area - Infill plantings of tree and shrub species to increase diversity within the site (Table 3)	Agreed	Complete

Document	Consultant	Item #	Nonconformance/Opportunity for improvement	Recommendation description	Comments by Holcim	Status
2021/22 Rehabilitation Report	Naturelinks	11	Opportunity for improvement	Extraction Site - Further planting to increase native species diversity (Table 5.).	Agreed	Complete
2021/22 Rehabilitation Report	Naturelinks	12	Opportunity for improvement	Extraction Site - Targeting broad leaf exotic species and blackberry with herbicide application by knapsack	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	13	Opportunity for improvement	Phase A & B Site - Follow up annual targeted herbicide application of Chilean Needle Grass with the aim of eventual elimination is recommended.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	14	Opportunity for improvement	Phase A & B Site - Herbicide application targeting blackberry in this area is recommended in the Autumn of 2022.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	15	Opportunity for improvement	Phase A & B Site - Continued managing thistle species by herbicide application using knapsack and tanker spray units.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	16	Opportunity for improvement	Phase A & B Site - Continue to monitor Deer impact. Naturelinks to prepare a control plan for consultation with Holcim if damage continues	Monitoring	In-progress
2021/22 Rehabilitation Report	Naturelinks	17	Opportunity for improvement	Phase C Site - Continue targeting Blackberry, Common Pampas Grass and Thistle species by herbicide application by knapsack and further increasing accessibility to the site.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	18	Opportunity for improvement	Phase C Site - Planting of native tree, grass and lily species within wet areas north and south of the graveyard area to increase native diversity and canopy cover (Table 7.	Agreed	Complete
2021/22 Rehabilitation Report	Naturelinks	19	Opportunity for improvement	0.8 Hectare Revegetation Site - Continue targeting broadleaf exotic species with herbicide application.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	20	Opportunity for improvement	0.8 Hectare Revegetation Site - Begin targeting exotic grass species with herbicide application in 2022.	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	21	Opportunity for improvement	0.8 Hectare Revegetation Site - Second year planting to be completed in 2022 following the first-year planting done in 2021	Agreed	Complete
2021/22 Rehabilitation Report	Naturelinks	22	Opportunity for improvement	Net Gain Site - Managing problem exotic species with herbicide application and hand-weeding including Bishop's Weed (Ammi visnaga), English ivy (Hedera helix), Japanese Honeysuckle (Lonicera japonica) and St. Augustine Grass (Stenotaphrum secundatum).	Agreed. To be completed as part of normal weed management practices	Complete
2021/22 Rehabilitation Report	Naturelinks	23	Opportunity for improvement	Net Gain Site - Increasing native species diversity and canopy cover with further planting within wet areas in both the Northern and Southern sections of the site to be completed in 2022 (Table 12.).	Agreed	Complete
2021/22 Rehabilitation Report	Naturelinks	24	Opportunity for improvement	Net Gain Site - Continue to monitor Deer impact. Naturelinks to prepare a control plan for consultation with Holcim if damage continues	Monitoring	In-progress
2021 Groundwater and Spring Review	AECOM	1	Opportunity for improvement	During the June and December 2021 spring survey, it was noted that signage for the labels at spring locations SP01 and SP05, located on the southern and western sides of the quarry, were incorrectly labelled. This should be investigated to confirm the correct signage is in place.	Agreed	In-progress
2021 Groundwater and Spring Review	AECOM	2	Opportunity for improvement	Decrease the number of spring surveys to one event per annual review period. The spring survey should be completed during the same season to capture late spring and summer conditions, when springs are likely not affected by significant periods of rainfall (such as during winter conditions).	Considered, will maintain status quo in 2022 and give consideration in 2023	Complete
2021 Groundwater and Spring Review	AECOM	3	Opportunity for improvement	Remove spring locations from the monitoring program where the ground considerations have changed, such as at SP09 and SP10 due to the fire track construction.	Considered, will maintain status quo in 2022 and give consideration in 2023	Complete
2021 - Slope stability review	AECOM	1	Opportunity for improvement	Fill animal burrowing holes and revegetate scarps at Mass11	Agreed will complete when ground conditions permit	In-progress
2021 - Slope stability review	AECOM	2	Opportunity for improvement	Revegetation of scarp surfaces with grasses proposed at Mass05, Mass08 and Mass13; and	Agreed for Mass05 and Mass13. Mass08 is not on Holcim land	In-progress
2021 - Slope stability review	AECOM	3	Opportunity for improvement	Remedial treatments previous proposed for Mass 02, Mass04 and Mass13 Dam remain, as this has not yet been undertaken. These are aimed at establishing a permanent freeboard and reinstating the dam embankment. Whilst the dams are typically located remotely to existing downslope infrastructure, should failure occur, the potential for downslope damage exists. In the case of the dam at Mass13, more detailed assessment of runout paths should be undertaken to assess the risk, if any, to infrastructure.	Under review	
2021 - Slope stability review	AECOM	4	Opportunity for improvement	Remedial treatment of Mass06 Dam with reinstatement of the dam crest and construction of a barricade to prevent animal access to the dam crest.	Under review	
2021 - Slope stability review	AECOM	5	Opportunity for improvement	Holcim should notify the landowner of the dam located upstream of Mass 14 of the important seepage observed and recommend the dam be inspected by an experienced and qualified dams or geotechnical engineer.	Landowner has a copy of the report	Complete
2021 EMP Audit	EnviroRisk Management	2	Opportunity for improvement	A suitable qualified and experienced specialist, should be appointed to conduct all training of site personnel in surface and ground water quality monitoring activities, in accordance with EPA guidelines and industry best practise	As per 2021 audit - Holcim procedure developed internally using similar procedure from another Holcim site. Holcim considered it was not reasonable to get ALS to train employee in work that they could do themselves. New procedure developed for WQ tester to follow. Calibration of WQ equipment is done by QM.	Complete
2021 EMP Audit	EnviroRisk Management	9	Opportunity for improvement	On Page 9 of the ministers report, attached at Appendix 12, of the EMP, there is an incorrect reference to the noise limit descriptor, it should be Leq, but it is specified as La90. A note to reflect should be attached to future versions of the EMP to avoid confusion	2021 EMP review Section B - Operational Management and Monitoring correctly states Leq.	Complete
2021 EMP Audit	EnviroRisk Management	11	Opportunity for improvement	To ensure consistency and reliability in data gathering, Holcim should develop a noise monitoring procedure so that it is to be followed by all personnel conducting routine and periodic noise monitoring as specified in the monitoring section of the EMP	Drafted	In-progress

Document	Consultant	Item #	Nonconformance/Opportunity for improvement	Recommendation description	Comments by Holcim	Status
2021 EMP Audit	Envirorisk Management	16	Opportunity for improvement	Post a sign at the dual interceptor trap stating that the pump out service contractors must provide a copy of the EPA certificate within one week of collection or Holcim to access their portal	Not viable, Site management currently obtains EPA waste certificates from contractor	Complete
2021 EMP Audit	Envirorisk Management	17	Opportunity for improvement	Holcim should consider and implement the specialist Groundwater and Spring review letter dated 27/1/21	As per 2021 Groundwater and Spring recommendations	Complete
2021 EMP Audit	Envirorisk Management	18	Opportunity for improvement	The recommendations in the specialist slope stability inspection report should be entered into INX and actioned within appropriate time frames. Where recommendations are impracticable due to steepness and ground conditions, alternative strategies should be considered with specialists.	In Progress	In-progress
2021 EMP Audit	Envirorisk Management	19	Opportunity for improvement	Determine weather humane and appropriate deer control measures need to be implemented to avoid significant damage to vegetation and offset areas	Monitoring as per 2021/22 Rehabilitation Report.	Complete
2021 EMP Audit	Envirorisk Management	22	Opportunity for improvement	Progress the development of further waste reduction measures by engaging waste contractors to assist in the process	Some additional recycling streams introduced (E-Waste)	In-progress
2021 EMP Audit	Envirorisk Management	23	Opportunity for improvement	Develop and deliver a toolbox talk on waste management on the site, after further management measures have been agreed with the waste contractors	Not started	Not Complete
2021 EMP Audit	Envirorisk Management	25	Opportunity for improvement	Prescribed waste storage bins need to be more clearly signed to prevent co-mingling with all other wastes	Signage installed	Complete
2021 EMP Audit	Envirorisk Management	27	Opportunity for improvement	Site should have a map of the spill kits on site, kept up to date, This map should be provided to Absorb, (the kit service contractor) prior to each of their quarterly restock, to ensure all kits are checked	Complete	Complete
2021 EMP Audit	Envirorisk Management	34	Opportunity for improvement	Consider updating the signs on the boundary fence so they reference Holcim not Readymix	Not started	Not Complete
2020 rehabilitation progress report	Naturelinks	9	Opportunity for improvement	Provide mulch circles around all future plantings	Consider during each planting	Complete
2020 Die Back Report	Naturelinks	5	Opportunity for improvement	Access track provided through site to ensure access for future management vehicles, to ensure effective and efficient watering and weed control.	In review with Naturelinks - additional access gates may assist	In-progress
2020 Future works recommendations	Naturelinks	2	Opportunity for improvement	Pre-treat all Acacia seeds and use Wattle Grow to enhance seedling survival (Thrall et al, 2001 and Carr et al, 2007)	not specific to LRMP, but consider at the time of hydroseeding	In-progress
2020 Future works recommendations	Naturelinks	4	Opportunity for improvement	Install Mulch circles around each plant using recycled pallet mulch MR20 at a depth of 10mm at a 50cm radius around each individual plant (to be blown in)	Consider at each planting event where available	Complete
2020 Future works recommendations	Naturelinks	5	Opportunity for improvement	Stage all plantings for both understory and mid and upper story plantings over a minimum of 3-5 years following direct seeding. Both under and mid story plantings have increased success once an overstory is beginning to establish	Consider at each planting event where available	Complete
2020 EMP annual report	ERM	4	Opportunity for improvement	Review the dust monitoring trends year on year can be useful in determining whether further dust mitigation measures are warranted	Dust levels continue to be within compliance limits. Continue to monitor now dust deposition has changed to ash analysis.	Complete
2020 EMP annual report	ERM	6	Opportunity for improvement	Investigate relocating the surface water sampling point to avoid the influence of natural run off	Not seen as a viable option at this stage as the V-notch is the last point of discharge	Complete
2020 EMP annual report	ERM	8	Opportunity for improvement	Testing of running water downstream of the V-notch weir should also be conducted to confirm quality of runoff	Investigating	Not Complete
2020 EMP annual report	ERM	9	Opportunity for improvement	Provide inspection personnel with further information on what to look for when determining whether there is an algal bloom in the dam	Water colour especially in-pit appears to be reflective of fines/mineral content, not algae presence. Eurofins sampled the two pit water storage location and Donnazans dam 26/7/22. Results were that "Current levels are unlikely to influence water quality."	Complete
2020 EMP annual report	ERM	11	Opportunity for improvement	Implement the additional minor remedial measures recommended by the consultant report on the slope stability inspection	Superseded by 2021 slope stability report	Cancelled
2020 EMP annual report	ERM	15	Non Conformance	In assessing what further waste reductions might be achievable, Holcim should engage with other similar company sites within Australia and elsewhere	Extra recycling strategies in place	In-progress
2019 Slope stability review	AECOM	1	Opportunity for improvement	Introduce additional vegetation at the crest of a scarp at "Back scarp of large historical landslide" (refer Attachment 1), as it appeared to be freshly eroded and retreating	Superseded by 2021 report	Cancelled
2019 Slope stability review	AECOM	2	Opportunity for improvement	Fill animal burrowing holes and revegetate scarps at Mass11;	Superseded by 2021 report	Cancelled
2019 Slope stability review	AECOM	3	Opportunity for improvement	Revegetation of scarp surfaces with grasses proposed at Mass08 and Mass13; and	Superseded by 2021 report	Cancelled
2019 Slope stability review	AECOM	4	Opportunity for improvement	Remedial treatments previous proposed for Mass13 Dam remain, as this has not yet been undertaken. These are aimed at establishing a permanent freeboard and reinstating the dam embankment. Whilst the dams are typically located remotely to existing downslope infrastructure, should failure occur, the more detailed assessment of runout paths should be undertaken to assess the risk, if any, to potential for downslope damage exists. In the case of the dam at Mass13, more detailed assessment of runout paths should be undertaken to assess the risk, if any, to infrastructure.	Superseded by 2021 report	Cancelled