

HOLCIM EMP CONSULTANT RECOMMENDATIONS

Document	Consultant	Item #	Nonconformance/Opportunity for improvement	Recommendation description	Comments by Holcim	Status
2023 EMP Audit	Envirorisk Management	1	Opportunity for improvement	Complete, issue and implement the Work Procedure being developed for waste management training.	Waste Management WP issued.	Complete
2023 EMP Audit	Envirorisk Management	2	Opportunity for improvement	Conduct an annual refresher induction for relevant Holcim employees, examining particular issues (beneficial and detrimental) that occurred over the preceding year as well as a reminder of the key environmental aspects of the site, highlighting any changes from the preceding year.	Agreed will commence Jan 2024	In-progress
2023 EMP Audit	Envirorisk Management	3	Opportunity for improvement	Prepare an EMP variation to pick up on items not corrected in the most recent 5 year review (e.g. some of the changes to EPA's legislation).	Agreed	In-progress
2023 EMP Audit	Envirorisk Management	4	Opportunity for improvement	Some dirt is being tracked onto the roadway at the truck pull-over area outside the main gate. This should be investigated as to whether this was a 'one off' situation or a consistent problem, and rectified if the latter.	Road sweeping conducted on a weekly basis including area adjacent to pull-over area	No further action
2023 EMP Audit	Envirorisk Management	5	Opportunity for improvement	Continue progressively replacing air monitors with new machines as a priority. Take any other necessary preventative measures to reduce the likelihood of data gaps occurring in future and respond to equipment outages, e.g. refurbishment or replacement of weather monitoring station (see Rec. 1), using BoM data from nearby representative monitoring station to cross-check site data.	All air monitors have now been replaced.	Complete
2023 EMP Audit	Envirorisk Management	6	Opportunity for improvement	Revise the sub-sections referring to fortnightly noise monitoring to incorporate the following methodology. All monitoring at resident locations should occur initially by measuring the 5 min LAeq (the 'noise level estimate'), with the measurer noting whether quarry noise is audible. Where a location registers a level estimate within 1 dB of the applicable EMP limit on two successive occasions where quarry noise is clearly audible, an expert with qualifications and experience in environmental noise measurement should be engaged to assess the noise level at that location in accordance with the published EPA Vic methodology current at the time to determine compliance with the EMP limit.	Noise monitoring work procedure to incorporate the new testing methodology	In-progress
2023 EMP Audit	Envirorisk Management	7	Opportunity for improvement	Where a distinction between the contributions of paddock runoff and quarry water needs to be made to help investigate inputs and sources, Dam water discharge should be field-tested at the end of the discharge pipe from the Dam (located at the toe of dam wall), not within the Dam itself.	Dam discharge is now measured at pipe from the dam not within the dam itself.	Complete
2023 EMP Audit	Envirorisk Management	8	Opportunity for improvement	Holcim should implement the two (2) recommendations of the AECOM Groundwater and Spring Review letter report of 15 March, 2023.	Winter survey has been removed. No change made to observation of SP09 and SP10.	Complete
2023 EMP Audit	Envirorisk Management	9	Opportunity for improvement	Holcim advises that it plans to install visual level gauges in each quarry pit/dam (northern and southern). These should be calibrated by survey so water levels can continue to be recorded as R.L.s (AHD).	Will continue to monitor with a surveyor until a practical way to install the level guages is established	Complete
2023 EMP Audit	Envirorisk Management	10	Opportunity for improvement	The AECOM slope inspection letter report (Feb, 2023) makes a number of recommendations for remedial works to mitigate the minor movements and other land stability issues observed. These recommendations should be entered into the ICARE 'action items' system and tracked to close out.	Actions entered into iCare	Complete
2023 EMP Audit	Envirorisk Management	11	Opportunity for improvement	Where early morning truck queuing adversely impacts local amenity, advisory measures such as signs at the bottom of Mt Shamrock Road should be considered and implemented in consultation with the responsible authority.	Early trucks will be captured in iCare as a hazard to capture occurrences. Responsible authority has declined re-instating signage on Mount Shamrock Rd.	Complete
2023 EMP Audit	Envirorisk Management	12	Opportunity for improvement	Holcim should update the smoke alarms and detectors inspection checksheet to remove reference to detectors with no remote indication.	Sheet updated	Complete
2023 EMP Audit	Envirorisk Management	13	Opportunity for improvement	As part of the EMP variation referenced in iii above, Holcim should draft appropriate waste management target(s) and submit to ERC for comment, and Council for approval, as provided for in s.8.3 EMP Variation and Appendix 3 of the EMP, 2021.	Agreed	In-progress
2023 EMP Audit	Envirorisk Management	14	Opportunity for improvement	Confirm with the priority waste removal contractor whether comingling of grease and silicon cartridges is acceptable practice. If not and the latter is a contaminant, toolbox relevant personnel on correct segregation of these items and put signs on containers to reinforce the message.	Waste comingling being checked during monthly "General Hazard & Housekeeping Inspection"	Complete
2023 EMP Audit	Envirorisk Management	15	Opportunity for improvement	As part of the EMP variation referenced in iii above, Holcim should revise the annual waste survey requirements of the EMP to a form of words that – a. best reflects a credible and effective waste minimisation and disposal strategy that aligns with the waste hierarchy and the circular economy principles of sustainable resource management, and b. provides a means of achieving the waste management targets.	Agreed	In-progress
2023 EMP Audit	Envirorisk Management	16	Opportunity for improvement	Progress all outstanding recommendations from the 5 yearly Dam integrity report that were contingent on completion of the consequence category assessment.	Agreed	In-progress
2023 EMP Audit	Envirorisk Management	17	Opportunity for improvement	Investigate and implement actions to mitigate the impacts of kangaroos and deer on the rehabilitation works.	Deer management is under consideration. Ongoing works to repair fencing to keep kangeroos out	In-progress
2023 EMP Audit	Envirorisk Management	18	Opportunity for improvement	The quarry boundary fence should be fixed if practical and effective to prevent feral animal damage and undermining.	Fence is repaired when damage is identified. However feral animal damage is ongoing issue.	No further action
2022 Groundwater and Spring Review	AECOM	2	Opportunity for improvement	Remove SP10 from ongoing monitoring where ground disturbance associated with the 2014 construction of the fire access track has stopped this seep from being a discrete groundwater discharge point separate from SP09.	No change made to observation of SP09 and SP10 for 2023 in line with discussions with ERC.	No further action

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2022 Slope stability review	AECOM	4	Opportunity for improvement	Remedial treatment of Mass13 and Mass06 Dam with reinstatement of the dam crest	Agreed will complete when ground conditions permit	In-progress
2022 Rehabilitation Report	Naturelinks	4	Opportunity for improvement	South-East Extraction - Continuation of plantings of dry-tolerant mid and lower story species along ridgeline and back slope to expand revegetation zone and reduce weed coverage	Agreed - Naturelinks engaged to complete plantings	In-progress
2022 Rehabilitation Report	Naturelinks	8	Opportunity for improvement	Southern Extraction - Plant additional drought tolerant species		Complete
2022 Rehabilitation Report	Naturelinks	9	Opportunity for improvement	Extraction Site - Planting of small dry tolerant shrubs on rise below main access track		Complete
2022 Rehabilitation Report	Naturelinks	12	Opportunity for improvement	Phase A & B Site - Conduct off site survey on Holcim owned properties to better understand infestations of Chilean Needle Grass encroaching on Phase A & B's future impact on rehabilitation.	Agreed - Naturelinks engaged to complete this work	In-progress
2022 Rehabilitation Report	Naturelinks	15	Opportunity for improvement	Phase A & B Site - Additional plantings to be undertaken on the northern end of site to bolster screening for nearby stakeholders		Complete
2022 Rehabilitation Report	Naturelinks	16	Opportunity for improvement	Phase A & B Site - Recommend deer impact to be independently assessed by a pest management consultant and that repair of external fencing to be considered	Under review	
2022 Rehabilitation Report	Naturelinks	17	Opportunity for improvement	Phase A & B Site - Expand species diversity by planting a small number of over storey species		Complete
2022 Rehabilitation Report	Naturelinks	20	Opportunity for improvement	Phase C - Increasing species diversity by planting a small number of Powelltown Coreia reflexa var. lobatus		Complete
2022 Rehabilitation Report	Naturelinks	22	Opportunity for improvement	0.8 Hectare Revegetation Site - Continue expanding species diversity in particular shrub species more adapted to stabilised conditions		Complete
2022 Rehabilitation Report	Naturelinks	23	Opportunity for improvement	0.8 Hectare Revegetation Site - Lily plantings to be double staked and guarded in the same way as trees and shrubs		Complete
2022 Rehabilitation Report	Naturelinks	24	Opportunity for improvement	Landslip Sites - Due to extremely late planting monitor plant survival and possible plant replacement in 2023	Monitoring	In-progress
2022 Rehabilitation Report	Naturelinks	27	Opportunity for improvement	Net Gain Site - Increasing species diversity by planting a small number of Powelltown Coreia, Coreia reflexa var. lobatus		Complete
2022 Rehabilitation Report	Naturelinks	28	Opportunity for improvement	Net Gain Site - Recommend deer impact to be independently assessed by a pest management consultant	Under review	
2022 Rehabilitation Report	Naturelinks	31	Opportunity for improvement	1.2 Hectare Revegetation Site - Recommend deer impact to be independently assessed by a pest management consultant	Under review	
2022 Rehabilitation Report	Naturelinks	32	Opportunity for improvement	Paddock Replacement Site - Repair of damaged quadrants to exclude cattle		Complete
2022 Rehabilitation Report	Naturelinks	33	Opportunity for improvement	Paddock Replacement Site - Potential replacement of a small number of dead plantings in 2023	Monitoring	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.	GHD report distributed	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 Q3/Q4 2023	In-progress
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	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.	Carried over in the 2022 report actions.	Cancelled
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
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	Waste Management WP issued.	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.	Agreed will complete when ground conditions permit	In-progress