

HOLCIM EMP CONSULTANT RECOMMENDATIONS

Document	Consultant	Item #	Nonconformance (NC) /Opportunity for improvement (OFI)/Business as Usual (BAU)	Recommendation description	Comments by Holcim	Status
2024 EMP Audit	Envirorisk Management	1	OFI	Update the EMP review procedure to include a mechanism to allow for updates of procedures/processes identified as a result of new legislation or identified risks within the annual LRMP review and the 5 year EMP review period. These could be presented to the ERC as there is regulatory representation at those meetings and then attached as appendices to the current EMP and LRMP, and to be included in future update of the EMP and LRMP.	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2024 EMP Audit	Envirorisk Management	15	OFI	Include appropriate waste management target(s) in the EMP after submission to ERC for comment, and Council for approval, as provided for in s.8.3 EMP Variation and Appendix 3 of the EMP, 2021.	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2024 EMP Audit	Envirorisk Management	17	OFI	Update the EMP to include a form of words that 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.	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2024 EMP Audit	Envirorisk Management	20	OFI	Update EMP to reflect correct reporting timing to align with LRMP or vice versa – 3 monthly to ERC, annually for rehab report and monthly for inspection checks.	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2024 EMP Audit	Envirorisk Management	22	OFI	Include in the next EMP and LRMP update undertaking a preliminary site investigation at completion of works and in accordance with the National Environment Protection Measure (Assessment of Site Contamination 1999 (as amended).	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2023 Rehab Report	Naturelinks	50	OFI	Chilean Needle Grass monitoring and control - Naturelinks recommends the use of the herbicide Tussock (active ingredient Flupropanate), this chemical will kill plants and prevent germination from existing seed for a number of years. This chemical has been engineered to specifically target the genus of grasses which Chilean Needle Grass belong (Nassella)	Due to the concern of stakeholders about the use of a residual herbicide and its longer term environmental impact and the required complication about stock exclusion from sprayed areas with Tussock herbicide, which is not required for glyphosate the continuation of just using glyphosate will be adopted.	Parked
2023 Toomuc Valley Slope Inspection	AECOM	5	OFI	8.0 Supplementary Comments – Presence of Farm Dams As part of the January 2024 inspection, the AECOM inspecting personnel was escorted by Holcim to three farm dams for inspection – the dam at the base of Mass 6, the dam southwest of Mass 5 and the dam immediately west of Mass 13. Attachment 3 shows the location of the three dams. It is noted that the presence of dams within landslide-prone slopes presents risks, including: <ul style="list-style-type: none"> • Water infiltration from standing water in dams increases the risk of landslide re-mobilisation. • Movement of the slope may have adverse effects on the performance of the dam to effectively retain water. • Deposition of re-mobilised landslide debris into the dam. These risks and related considerations are best informed by a site-specific assessment of the dam. When considering the risks associated with dam failure, the downslope consequences need to be assessed. This is particularly the case when there is a possibility of dam failure impacting people and property beyond the Holcim site. Aerial photos indicate that there is at least one location where a house is located downslope of a landslide mass and accompanying dam. It is our understanding that the monitoring requirements of Sub-section 2.5.4 of the EMP, which this report is intended to address, do not include inspection of the farm dams. The risks associated with the impacts of dam failure should be investigated by Holcim. We draw your attention to the DELWP publication “Your dam: Your responsibility. A guide to managing the safety of small dams” for further details (https://www.water.vic.gov.au/__data/assets/pdf_file/0027/668610/yourdam-your-responsibility.pdf).	Encompass Mining Solutions have undertaken a consequence category rating as per the ANCOLD Guidelines on Tailings Dams (2019) for the three dams in the Toomuc Valley Slope Inspection (2024) Report.	Complete
Pakenham Quarry Hydrogeological Review	GHD	1a	OFI	Improve the monitoring technique for the springs to allow a more quantitative and consistent measurements: <ul style="list-style-type: none"> • Establishment of v-notches and/or gauge boards / stilling wells at all sites (subject to ground truthing) is recommended, or at a minimum, two priority springs of flow and /or levels 	Basic mechanical metering devices have been fitted to Spring SP01 and SP02. SP03 still to be fitted with mechanical metering device. Survey pegs installed in standing water levels associated with SP04 and SP06 to measure level. SP08 and SP09 are large systems that will require capital works to install metering devices which are not being pursued at this point in time. SP05 and SP11 (new spring) have no free standing water. SP07 and SP10 are reclassified as a seeps.	In-progress
Pakenham Quarry Hydrogeological Review	GHD	3	OFI	Update the understanding of the estimated radius of influence of the quarry. This should be supported with site specific hydraulic conductivity data (slug testing), an update of the quarry water balance, and bore network recommendations noted above.	Access has been obtained to State Observation Network (SON) bore 84032, as recommended by GHD, which will commence being monitored on a monthly basis from November 2024. Slug testing completed Dec 2023. This is an ongoing action that should be captured as a part of the annual report.	In-progress
2023 EMP Audit	Envirorisk Management	3	OFI	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).	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2023 EMP Audit	Envirorisk Management	13	OFI	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.	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress

Recommendations are removed from sheet once shown as complete

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2023 EMP Audit	Envirorisk Management	15	OFI	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.	Included in Drafted changes in 2024 EMP. Submitted to Cardinia Shire Council in December 2024	In-progress
2022 Slope stability review	AECOM	4	OFI	Remedial treatment of Mass13 and Mass06 Dam with reinstatement of the dam crest	Agreed will complete when ground conditions permit	In-progress
2020 Die Back Report	Naturelinks	5	OFI	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