

Document	Consultant	Item #	Nonconformance (NC) /Opportunity for improvement (OFI)/Business as Usual (BAU)	Recommendation description	Comments by Holcim	Status
2024/25 EMP Audit	Envirorisk Management	1	OFI	Display current copies of the SIT Minutes on Noticeboards	Updated	Complete
2024/25 EMP Audit	Envirorisk Management	2	OFI	The PM10 monitoring targets specified within the EMP (currently states 64 µg/ m3) need to be updated to align with the new PM10 value of 50 g/m3 (1 day average) as specified in the Environment Reference Standard 2021. Suggest engaging an air specialist to assist in determining a real time action threshold (e.g. 80-90% of the limit) that may assist with compliance on this issue	Daily PM10 results have been reported against the Environment Reference Standard 2021 value of 50 µg/m3 since June 2024 with no exceedances of the limit. Reporting against this daily limit will continue in the Monthly Dust Reports. The current EMP PM10 target (1 hour ave.) – 64µg/m3 will be used as a real time action threshold, which will allow for timely response to comply with the daily target. The EMP Monitoring target will be updated with the new PM10 value of 50 µg/m3 (1 day average) as specified in the Environment Reference Standard 2021 if/when the 2024 EMP is approved by the Cardinia Shire Council.	In-progress
2024/25 EMP Audit	Envirorisk Management	3	OFI	Obtain an internet service provider that can provide internet coverage to the site to allow for the tablet in the plant operators hut to effectively monitor PM10 emissions.	Site has reverted back to Telstra	Complete
2024/25 EMP Audit	Envirorisk Management	4	OFI	Update noise section of EMP to state objective of meeting environmental values for noise as specified in the Environment Reference Standard 2021.	Noise objective to be updated to include " <i>Meeting the environmental values for noise as specified in the Environment Reference Standard 2021</i> " if/when the 2024 EMP is approved by the Cardinia Shire Council.	In-progress
2024/25 EMP Audit	Envirorisk Management	5	OFI	Review and as appropriate progress recommendations within the ENGENY Surface Water Assessment.	Holcim will proceed to work through the detail design stages of this project (geotechnical risks, potential clean/dirty water diversions, costs, etc).	In-progress
2024/25 EMP Audit	Envirorisk Management	6	OFI	Review and as appropriate implement the six (6) recommendations of the 2024 GHD Groundwater and Spring Review Monitoring report.	Agreed. Actions to be monitored via EMP consultant action sheet (this sheet)	No new/further action
2024/25 EMP Audit	Envirorisk Management	7	OFI	The recommendations from the Toomuc Valley 2024 Slope Stability Inspection Report, ENCOMPASS Mining Solutions should be implemented through the ICARE system.	Agreed. Actions to be monitored via EMP consultant action sheet (this sheet)	No new/further action
2024/25 EMP Audit	Envirorisk Management	8	OFI	Review and as appropriate progress the recommendations in 2024 Naturelinks report.	Agreed. Actions to be monitored via EMP consultant action sheet (this sheet)	No new/further action
2024/25 Annual Report	GHD	1	BAU	Continue with groundwater and spring monitoring as per the approved EMP.	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	GHD	2	BAU	Include identified new spring SP11 in the monitoring	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	GHD	3	BAU	Undertake regular measurements of the flow meters at springs SP01 and SP02.	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	GHD	4	BAU	Continue with groundwater monitoring from SON bore 84032.	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	GHD	5	BAU	Complete ongoing inspection and maintenance of the monitoring bore headworks (for all monitoring bores).	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	GHD	6	OFI	Label bores so they can be identified by field staff. Consider securing (locking) bores to prevent unauthorised access.	Bores have all been labelled.	Complete
2024/25 Rehab Report	Naturelinks	1	BAU	South-East Extraction Area - Maintain broadleaf-selective herbicide application. • Continued slashing and herbicide application of perennial exotic grasses. • Continued hand-weeding and disposal of seeding Chilean Needle Grass followed up by herbicide spraying of younger plants. • Continue to monitor rabbit activity and report any suspected rabbit burrows to quarry management • Continue to monitor tree and shrub plantings, in particular those planted on the ridgeline. • Plant additional dry-tolerant species for in-fill plantings to expand diversity and reduce weed coverage (Table 3).	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	2	BAU	Southern Extraction Area - Maintain broadleaf-selective herbicide application. • Continued slashing and herbicide application of perennial exotic grasses. • Continued hand-weeding and disposal of seeding Chilean Needle Grass followed up by herbicide spraying of younger plants. • Spot spray with knapsack weedy grass species growing amongst and near Weeping Grass (Microlaena stipoides) to reduce competition and encourage Weeping Grass recruitment and spread. • Plant additional drought-tolerant shrub species (Table 5).	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	3	BAU	Extraction Site - Targeting broad leaf exotic species with herbicide application by knapsack. • Targeting blackberry with herbicide application by knapsack and cut and paint with glyphosate where there is a risk of damage to native vegetation. • Hand-weeding and disposal of any seeding Chilean Needle Grass and Serrated Tussock followed up by herbicide spraying of younger plants. Maintain vigilance for any new infestations • Removal of Coastal wattle (Acacia longifolia) along with any germinates and hybrids.	Agreed. Inline with current practices and to be continued.	No new/further action

Document	Consultant	Item #	Nonconformance (NC) /Opportunity for improvement (OFI)/Business as Usual (BAU)	Recommendation description	Comments by Holcim	Status
2024/25 Rehab Report	Naturelinks	4	BAU	Phase A & B Site - Continue herbicide application by both knapsack and tanker spray unit targeting broadleaf weed species. • Continue herbicide application by knapsack targeting blackberry and small woody weeds. • Continue herbicide application of Chilean Needle Grass with the aim of eventual elimination. • Planting of additional trees to bolster screening for nearby stakeholders (Table 8). • Continue with deer control program.	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	5	BAU	Phase C Site - Continue control of broadleaf weeds, blackberry, English ivy and small woody weeds with herbicide. • Herbicide spray and hand weed all Ragwort when encountered. • Notify quarry management and those undertaking deer control location of fox den.	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	6	BAU	0.8 Hectare Revegetation Area - Continue targeting broadleaf exotic species with a combination of Kamba M & Associate (Associate at half standard rate). • Control Toowoomba Canary-grass (Phalaris aquatic) by brush cutting and follow up spraying with herbicide. • Continued hand-weeding and disposal of seeding Chilean Needle Grass followed up by herbicide spraying of younger plants. • Harvest Wallaby grass seed in December 2025 to be used for future direct seeding • Continue expanding species diversity by planting drought tolerant tree and shrub species (Table 10).	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	7	BAU	Landslip Sites - Herbicide treatment of blackberry stands and Spear thistles Mass 4. • Additional trees and shrubs to be planted throughout the site as per request from quarry management (Table 11). • Continue to monitor deer activity and any damage caused to plantings	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	8	BAU	Net Gain Site - Continue managing exotic broadleaf and grassy weeds via herbicide application. • Continue spraying Wild Carrot and Winter Heliotrope with Associate (metsulfuron methyl) herbicide. • Continue to control Ragwort by a combination of herbicide application and hand weeding. • Continue to monitor NE Corner of Northern Section for St. Augustine grass. • During summer months when water levels are the lowest brush cut access paths into the two main swamp areas of the Northern sections, allowing access for weed control. • Continue spraying of blackberry with herbicide, access blackberry in swamp areas by using brush cut paths. • Plant additional eucalyptus adapted to wet and swampy conditions in Northern and Southern zones (table 13). • Monitor Weeping grass seed development to determine optimal time for harvest. Attempt to harvest viable seed for future direct seeding. • Continue with deer control program and monitor species impact	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	9	BAU	1.2 Hectare Revegetation Site - Keeping broadleaf weeds controlled via selective herbicide application using tankers. • Control of Toowoomba Canary-grass by brush cutting and follow up spraying with herbicide. • Harvest Wallaby grass seed to be used for future direct seeding projects • Continue expanding species diversity by planting draught tolerant tree and shrub species (Table 16).	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	10	BAU	Paddock Replacement - Monitor plant survival and replace any dead plantings. • Notify quarry management if any additional quadrants need repair.	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	11	BAU	2023 Planting Area - Maintain control of broadleaf weeds with selective herbicide application by spray tanker for 2023 Planting Area and adjacent areas. • Monitor lower half of site recording the survival rates by species. • Plant additional species that are tolerant of both very wet and dry conditions to expand diversity and reduce weed coverage (Table 20).	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	12	BAU	South East Extraction Backslope - Regular control of all broadleaf and grassy weeds throughout the site with herbicide application via tanker. • Herbicide spraying of reshooting blackberry by knapsack on slope and immediate area • Continue careful spray works from ridgeline and down the slope to protect recruiting native Wallaby grass. • Maintenance of guards around plantings as frequent tanker spaying poses a higher risk of off-target damage • Undertake additional plantings prioritising species that are well suited to moist deep soils with high fertility	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	13	BAU	Southern Hillside - Control of blackberry by application of herbicide • Control of grassy weeds through herbicide application with an effort to protect and promote recruitment of native grass species • Control of broadleaf weeds across the site with care taken to limit off target damage to Austral bracken • Maintain seasonal brush cutting regime along quarry entrance road, collection and removal of woody debris to reduce fire risk and for aesthetic purposes. • Undertake additional plantings prioritising species suited for fertile deep soils	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	14	BAU	Northern Boundary - Replace dead plantings upon Quarry request • Stake and guard collection	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Rehab Report	Naturelinks	15	BAU	Lower Car Park - Replace dead plantings upon Quarry request • Stake and guard collection	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	Encompass Mining Solutions	1	BAU	Maintain existing regular visual inspection procedures by site personnel (i.e. maintain the approximately monthly to fortnightly inspections of each area as part of general operations, with additional visits to Farm Dam locations as identified in Section 4 of this report. If indications of slope instability are identified, notify a suitably experienced and qualified geotechnical engineer / engineering geologist for further assessment;	Agreed. Inline with current practices and to be continued.	No new/further action

HOLCIM EMP CONSULTANT RECOMMENDATIONS

Document	Consultant	Item #	Nonconformance (NC) /Opportunity for improvement (OFI)/Business as Usual (BAU)	Recommendation description	Comments by Holcim	Status
2024/25 Annual Report	Encompass Mining Solutions	2	BAU	Continue efforts to manage surface water runoff from the natural springs	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	Encompass Mining Solutions	3	BAU	Continue to undertake annual inspection	Agreed. Inline with current practices and to be continued.	No new/further action
2024/25 Annual Report	Encompass Mining Solutions	4	OFI	Remedial treatment of Farmers Dam 13 with revegetation of the small failure surface with grasses/shrubs to limit the ongoing rilling and erosion.	Agreed	In-progress
2024/25 Annual Report	Encompass Mining Solutions	5	OFI	Remedial treatment of lower Mass 05 backscarp areas with revegetation of grasses/shrubs to limit the ongoing erosion.	Agreed	In-progress
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
Pakenham Quarry Hydrogeological Review	GHD	1a	OFI	Improve the monitoring technique for the springs to allow a more quantitative and consistent measurements: • 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 will 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 seeps.	Complete
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.	Complete
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
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	Refer to actions from 2024/25 Annual Report	No new/further action
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.	50% complete as at May 2025	In-progress