

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 EMP Audit	Enviorisk 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	Enviorisk 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 "Meeting the environmental values for noise 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	Enviorisk 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 EMP Audit	Enviorisk 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	Enviorisk 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	Enviorisk 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	Enviorisk 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	Enviorisk 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 EMP Audit	Enviorisk 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	Enviorisk 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	Enviorisk 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