



IMPORTED MATERIALS MANAGEMENT PLAN

Imported Topsoil for Site Rehabilitation Purposes at Pakenham Quarry

Revision 2 - June 2026

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REVISION HISTORY

Revision	Summary of Amendments	Reviewed By	Issued By	Issue Date
R0	Draft for Review	G. Pirie	M Dodd	20/02/2026
R1	Issued	M. Dodd	G. Pirie	27/04/2026
R2	Inclusion of confirmation monitoring	G. Pirie	G. Pirie	19/06/2026

BACKGROUND

This Imported Materials Management Plan has been prepared to meet the requirements of the Imported Materials Management Guidelines for Mines and Quarry Operations, published by Earth Resources Regulation (ERR), and provides the framework to manage imported in the form of soil for the specific purposes of Rehabilitation for the Pakenham Quarry, WA174.

The rehabilitation plan for the Pakenham quarry requires a minimum 150mm of topsoil to be spread over backfilled batters and the quarry floor.

This Imported Materials Management Plan documents and formalises the process of receiving imported materials that are brought onto the Work Authority for use in Rehabilitation. If necessary, there may be short-term stockpiling of material until a sufficient quantity is held prior to a rehabilitation campaign. There is no intent to process or sell this imported material.

OBJECTIVES

The objectives of this Imported Materials Management Plan are to:

- Define the types of material and source controls that may be imported to the work authority for use in rehabilitation of the Pakenham Quarry.
- Document the procedures to be implemented to ensure that only those materials the work authority is authorised to receive are imported to the work authority.
- Document the procedures to be implemented for the acceptance, handling, processing, and stockpiling of materials imported to the work authority.

WASTE CLASSIFICATION

The *Environment Protection Act 2017* requires that any producer of industrial waste, or those in management or control of industrial waste, must classify the waste in accordance with the Act and the *Environment Protection Regulations 2021*.

The *Environment Protection Act 2017* defines 'Industrial waste' as all "waste arising from commercial, industrial or trade activities or from laboratories" or as prescribed. Waste being defined as any "matter that is discarded, rejected, abandoned, unwanted or surplus, irrespective of any potential use or value" and includes matter "intended for, or is undergoing, resource recovery". Under this broad definition 'industrial waste' includes paddock rock and concrete materials being imported to the work authority.

Clean Fill (Topsoil and compost (compliant with AS 4454) for the purpose of this plan) Category 'D' are classified as industrial waste (non-priority)', in accordance with EPA Publication 1968.1 *Guide to Classifying Industrial Waste* drawing on the waste classification table listed as Schedule 5 in the *Victorian Environment Protection Regulations 2021*.

The *Environment Protection Act 2017* requires that anyone who is transporting industrial waste, must before relinquishing management or control of that waste, take all reasonable steps to ensure that it will be

delivered to a site that is authorised to receive that waste. This requirement ensures that relevant information is passed on through the waste supply chain, so it can be determined where the waste can be lawfully taken for resource recovery, reuse or disposal, and those receiving the waste can manage any associated risks.

It is an offence under the *Environment Protection Act 2017* for a person who has the management or control of industrial waste to provide false or misleading information or documents in connection with the type, properties and classification of the industrial waste, or to conceal such information or documents.

APPROVALS REQUIRED

In accordance with ERR (2017), Imported Materials Management Guidelines – For Mine and Quarry Operations, The Work Authority holder must seek written advice from Earth Resources Regulation for the use of imported soil for rehabilitation Purposes. The record of this must be uploaded into ICARE.

SOURCE SELECTION

The Quarry Manager or Operations Manager are the only roles that can approve a source of topsoil/compost. The source selection is critical to minimise any risk of contamination or low quality rehabilitation outcomes due to incorrect soil properties.

Evidence that the soil has been tested and complies with the requirements of AS4419:2018 Soils for 'landscaping and garden use' must be received prior to acceptance. Where possible the soil should come from local sources and be comparable with the in situ topsoil. Compost must be fully pasteurised and compliant to AS4454 and classified as a product.

INCOMING LOADS – RECORDING OF LOAD DETAILS

RECORDING INCOMING LOAD DETAILS

Tracking data will be recorded for all loads of imported materials. This data will be recorded in the Pakenham tab of the regional incoming waste register. The following details are to be recorded:

WEIGHT OF THE INCOMING LOAD

All trucks carrying imported materials must provide a weighbridge docket from the point of collection or be weighed over the Pakenham weighbridge upon arriving at site.

RECORD RECEIVER DETAILS

These details are automatically populated in the register by entering the sites SAP Plant number in the “Plant #” column.

CLASSIFY AND RECORD THE TYPE OF MATERIAL

Data relating to the waste category (selected from the dropdown list options), receipt date, quantity (weight) and method of determining the quantity data shall be recorded in the Waste Details section of the register. As all loads of imported materials are weighed the method shall always be “Measured”.

INCOMING INSPECTION DETAILS

In this section of the register the truck registration details are recorded along with the outcome of the stage 1 inspection (see below), the location where the material was tipped off, any appropriate comments about the load and a declaration of load acceptance is made (Load Accepted or Load Rejected). A rejected load is not to be tipped off and the driver directed to remove the load from the site.

An accepted load may later be rejected following the stage 2 inspection (see below). If this occurs it should be noted in the comments section of the register.

RECORD MATERIAL GENERATOR DETAILS

If the waste generator is a Holcim site, then record the waste generator details by entering the generators SAP Plant # in the “Holcim Site” table.

If the waste generator is a 3rd party, information including the waste generator's business name, address and ABN must be recorded. Make sure to record the details of the waste generator not the waste transporter unless they are also the waste generator. These details are entered into the “3rd Party Site” table.

INSPECTION OF THE INCOMING LOAD

A two stage inspection process, undertaken by trained personnel, has been implemented for incoming materials. The first stage takes place on receipt of the load, the second when the load is tipped and before it is included in a mass stockpile.

STAGE 1 INSPECTION

The stage 1 inspection is a visual inspection of the material in the truck directly and via weighbridge/office cameras. The purpose of the stage 1 inspection is to ensure the loaded truck is carrying a material the work authority is permitted to import and to check for any obvious signs of contamination.

If the load is found to be contaminated with any other materials including but not limited to, concrete, asbestos, asphalt, bricks, metal, chemicals or litter during the stage 1 inspection, the load should be immediately rejected and the driver directed to remove the load from the site.

STAGE 2 INSPECTION

If contamination is not sighted, the weighbridge operator will advise the front end loader operator and direct the driver to the tipoff area. Once tipped off, the material shall then be subject to a stage 2 inspection. The stage 2 inspection is more thorough and is carried out after the load has been partially spread out using the front end loader. A stage 2 inspection is carried out by trained personnel wearing appropriate PPE.



Example of a contaminated load

If contamination is detected from the stage 2 inspection, the load must be classified as rejected then quarantined until such time as the material can be reloaded onto the delivery truck for removal. Alternatively, the load can be transferred to an appropriately licensed landfill facility at the waste generator's cost.

QUARANTINE OF REJECTED LOADS

If any waste is received at the activity site that is not Topsoil/compost (or is contaminated) that waste is placed in a designated and clearly sign-posted temporary storage area and is transported to a site which is authorised to receive this waste within 21 days of the date it was received.

To meet this requirement the site has established a quarantine process as set out below.

1. Once a load has been identified as contaminated it shall be rejected.
2. A rejected load is to be reloaded onto the delivery truck if that truck is still available and returned to the waste generator.
3. If the load cannot be reloaded for immediate removal the load is to be isolated from other materials and clearly signposted as a quarantined / rejected load.
4. Depending on the nature of the contamination, the quarantined / rejected load may need to be kept moist. This is most likely to occur if the load was identified as containing friable asbestos or other fibrous contamination.

5. The quarantined / rejected load will be left undisturbed for a maximum of 21 days until the waste generator is able to send a truck for reloading and removal of the load from the site.
6. In the event that the waste generator has not removed the quarantined / rejected load before 21 days, the load will be transferred to an appropriately licensed landfill facility at the waste generator's cost.

HANDLING AND STORAGE OF THE SOIL

STOCKPILING

The Quarry Manager or delegate will nominate a designated stockpile location which will be located away from water courses & site drainage lines and as close to the end use point as possible to minimise double handling.

To minimise wind blown erosion, the stockpile shall not exceed 2m in height and will be wetted down by a water cart as required

The stockpile will be monitored for noxious weeds and treated accordingly in line with the sites weed management plan

TRANSFER OF MATERIAL TO USAGE POINT

Upon the commencement of a rehabilitation campaign, the topsoil/compost will be moved by quarry Heavy Earthmoving Machinery (i.e loader and dump truck) and tipped at the end use point and pushed out by a Dozer to the desired thickness over the rehabilitation area.

CONFIRMATION MONITORING

Material imported under this management plan will be subject to confirmation of compliance with relevant Australian Standards and as such these materials are unlikely to contain contaminant concentrations above fill material thresholds. To confirm that this is the case confirmatory sampling and analysis will be undertaken on incoming materials at a frequency of 1 sample for each 500m³ of imported material.

A minimum of 3 increments shall be collected in a zigzag pattern across the sampling area then mixed into a homogeneous sample. This sample will be used to fill sample bags and jars provided by the laboratory for the analysis. All data requirements on the laboratory provided sample bags and jars will be completed and will align with sample information set out on the laboratory chain of custody form.

The outcomes from this analysis will be compared to the limits set out in Table 3 of EPA publication 1828 - Waste disposal categories: characteristics and thresholds. A copy of this table has been provided as Appendix A to this management plan.

IMPORTED MATERIAL CONTROL PLAN

Activity / Process	Action	Responsibility	Timing
Sourcing the material	- Where possible, prior notification of delivery of material shall be arranged to determine the type of material, the expected quantity and origin of the material. - Material must be approved by the Quarry Manager or Operations Manager - Mixed loads of imported materials shall be rejected.	Weighbridge Operator	All Loads
Delivery to Site	- Prominent signage has been installed to direct all delivery truck drivers to report to the office/weighbridge on arrival. - All drivers are to provide their truck registration details. This data will be recorded in the incoming waste register. - A stage 1 inspection (visual inspection from the weighbridge/office) shall be carried out for each load with outcomes (Load Accepted / Load Rejected) recorded in the incoming waste register. - If the incoming load passes the stage 1 inspection, the gross weight of the incoming load shall be recorded and the driver directed to the tipoff location. - All drivers will be instructed to pass over the weighbridge to record their tare weight once the load has been tipped off, if a delivery docket with the weight of the load has not been provided with the incoming material. This data will be used to determine the net quantity of material delivered.	Weighbridge Operator	All Loads
Site Security	A CCTV camera has been installed to monitor traffic including imported loads going in and out of the site. Footage from this camera shall be used to investigate any instance of unauthorized dumping of materials.	Quarry Manager (or representative)	Needs Basis
Stockpiling Material	- The Material shall be stockpiled in a designated location away from water courses, drains and other saleable material. - Controls to manage erosion, runoff and dust from imported material stockpiles shall be undertaken in accordance with SHEMS requirements.	Quarry Manager (or representative)	Monthly
Contamination and Hazardous Materials Management	- If a contaminated load is discovered, the producer shall be contacted and directed to collect the load for removal from the work authority or the load shall be sent to an appropriate land fill facility at the cost of the producer. - If waste has been illegally dumped on site by unknown persons, an incident shall be raised in iCare and investigated. If the responsible person can be identified the details shall be reported to the EPA and Victorian Police. - If waste has been illegally dumped on site by unknown persons, and the responsible person cannot be identified, the management and clean-up of this material will become the responsibility of the work authority.	Quarry Manager (or representative)	Needs Basis
Environmental and Community Impacts	Environmental and community impacts are to be managed in accordance with the Pakenham Environmental Management Plan and Holcim SHEMS.	Quarry Manager (or representative)	At All Times

REFERENCES

ERR (2017), Imported Materials Management Guidelines – For Mine and Quarry Operations

EPA (2021), Guide to Classifying Industrial Waste. Publication No. IWRG631

Australian Standard AS 4419:2018 Soils for landscaping and garden use

AS 4454-2012 Composts, soil conditioners and mulches

Environmental Protection Act 2017 (Victoria)

Environmental Protection Regulations 2021 (Victoria)

Holcim Safety, Health and Environmental Standards

GLOSSARY OF TERMS

In Coming Waste Register: Electronic means of recording incoming materials including washout material and returned concrete

Outgoing Waste Register: Electronic means of recording outgoing waste materials including general waste, oily wastes, contaminated soil, etc.

Front End Loader: Tractor used for the purpose of loading/carrying materials and pushing/toeing up stockpiles.

APPENDIX A

TABLE 3 OF EPA PUBLICATION 1828 - WASTE DISPOSAL CATEGORIES: CHARACTERISTICS AND THRESHOLDS.

Table 3: Fill material contamination total concentration upper limit

For the purposes of the definition of fill material in the Regulations, the total concentration thresholds in Table 3 below are the upper limit for industrial waste that is soil.

Soil that exceeds the total concentration threshold of any contaminant in Table 3 is a priority waste unless designated otherwise by EPA. In circumstances that you are aware of known or likely contaminants not included in this table please contact EPA for further guidance or a designation.

Contaminant	Fill material upper limit TC as dry weight (mg/kg)
Inorganic species	
Arsenic	20
Cadmium	3
Chromium (VI)	1
Copper	100
Lead	300
Mercury	1
Molybdenum	40
Nickel	60
Tin	50
Selenium	10
Silver	10
Zinc	200
Anions	
Cyanide	50
Fluoride	450
Organic species	
Phenols (halogenated) ¹	1
Phenols (non-halogenated) ²	60
Monocyclic aromatic hydrocarbons ³	7
Benzene	1
Polycyclic aromatic hydrocarbons ⁴	20
Benzo(a)pyrene	1
C6-C9 petroleum hydrocarbons	100
C10-C36 petroleum hydrocarbons	1000
Polychlorinated biphenyls	2
Chlorinated hydrocarbons ⁵	1
Perfluorooctanesulfonic acid (PFOS)	0.002
Perfluorohexanesulfonic acid (PFHxS)	0.001
Perfluorooctanoic acid (PFOA)	0.001

Pesticides	
Organochlorine pesticides ⁶	1

Notes for Table 3

1. Total sum of 4-chloro-3-methylphenol, 2-chlorophenol, 2,4-dichlorophenol, 2,6-dichlorophenol, pentachlorophenol, 2,3,4,5-tetrachlorophenol, 2,3,4,6-tetrachlorophenol, 2,3,5,6-tetrachlorophenol, 2,4,5-trichlorophenol, and 2,4,6-trichlorophenol.
2. Total sum of phenol, 2-methylphenol (o-cresol), 3-methylphenol (m-cresol), 4-methylphenol (p-cresol), 2,4-dimethylphenol, 2,4-dinitrophenol, 2-methyl-4,6-dinitrophenol, 2-nitrophenol, 4-nitrophenol, 2-cyclohexyl-4,6-dinitrophenol and dinoseb.
3. Total sum of benzene, toluene, ethyl benzene, xylenes (includes ortho, para and meta xylenes) and styrene.
4. Total sum of naphthalene, acenaphthylene, acenaphthene, anthracene, benzo(a)anthracene, benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(g,h,i)perylene, benzo(a)pyrene, chrysene, dibenzo(a,h)anthracene, fluorene, fluoranthene, indeno(1,2,3-c,d)pyrene, phenanthrene and pyrene.
5. Total sum of carbon tetrachloride, chlorobenzene, chloroform, 1,2-dichlorobenzene, 1,4-dichlorobenzene, 1,2-dichloroethane, 1,1-dichloroethene, 1,2-dichloroethene, dichloromethane (methylene chloride), 1,1,1,2-tetrachloroethane, 1,1,2,2-tetrachloroethane, 1,2,4-trichlorobenzene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, trichloroethene, tetrachloroethene, vinyl chloride and hexachlorobutadiene.
6. Total sum of aldrin, hexachlorobenzene, alpha BHC, beta BHC, gamma BHC (lindane), delta BHC, chlordane, DDT, DDD, DDE, dieldrin, endrin, endrin aldehyde, heptachlor, heptachlor epoxide, methoxychlor and endosulfan (includes endosulfan I, endosulfan II and endosulfan sulphate).