



**EnviroRisk**

APPROVALS - SUSTAINABILITY - COMPLIANCE

# **EMP COMPLIANCE AUDIT PLAN 2026**

**Holcim Pakenham Quarry  
Mt Shamrock Road, Pakenham Vic**

for

**Holcim (Australia) Pty Ltd**



# EnviroRisk

APPROVALS - SUSTAINABILITY - COMPLIANCE

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**Date:** 10 November 2025

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## 1.0 INTRODUCTION

EnviroRisk Pty Ltd (EnviroRisk) has been invited by Holcim (Australia) Pty Ltd (Holcim) to submit a proposal to conduct the annual independent compliance audit of their Environmental Management Plan (EMP) for the Mt Shamrock Quarry located in Pakenham, Victoria. The audit is due in February/March 2026 on dates to be confirmed by mutual agreement.

## 2.0 SCOPE AND OUTCOME

The Scope of this audit is to complete a detailed evaluation of compliance with the requirements of the current version of the '*Mt Shamrock Quarry – Environmental Management Plan*' (the EMP). The proposed audit program and timeframe is attached for review and comment by Holcim and the quarry's Environmental Review Committee (ERC).

The audit team will comprise two (2) Exemplar Global-certified auditors, Lok Nethercott (EMS Auditor and Project Director) and Stephen Jenkins (Auditor, Peer Review and QA). CVs are attached.

EnviroRisk will use an audit protocol based on the EMP referenced above. Upon completion of the audit, management will be briefed on the findings. A detailed audit report will be subsequently provided describing the processes and findings of the audit, including recommendations for any future management actions to correct non-compliances and improve environmental management at the quarry.

The audit will be conducted generally in accordance with the requirements of AS/NZS ISO 19011:2019 *Guidelines for auditing management systems*.

## 3.0 PROJECT AVAILABILITY

The auditors will be available to conduct the audit in late February/early March 2026 on dates to be confirmed by mutual agreement.

## 4.0 COMMUNICATIONS

For EnviroRisk, the principal point of contact will be: Lok Nethercott on 0447 009 905 and email [lnethercott@envirorisk.com.au](mailto:lnethercott@envirorisk.com.au)

## 5.0 AUDIT PROGRAM

The draft audit program is attached for review and comment.

## AUDIT PROGRAM 2026

TIME	TASK	DOCUMENTATION & EVIDENCE TO BE REVIEWED <sup>1</sup>
<b>DAY 1</b>		
<b>9:00am</b>	<b>Opening Meeting</b>	
9:30am	Desktop Overview of Site	<ul style="list-style-type: none"> <li>Site plan &amp; surrounding neighbour review including compliant/ incident history.</li> </ul> (Note: This may result in scheduling of meetings/ tele-calls with neighbours – this extra time is not scheduled here.)
10:00am	Evaluation of compliance <ul style="list-style-type: none"> <li>Air quality (Dust)</li> <li>Noise</li> <li>Blasting</li> <li>Surface water, drainage and groundwater</li> </ul>	<ul style="list-style-type: none"> <li>Significant Environmental Hazards Register</li> <li>Dust Management Procedure</li> <li>Noise Management Plan</li> <li>Quarry Blasting Procedure</li> </ul> Interviews with responsible personnel
<b>12:30pm</b>	<b>Lunch</b>	
1:00pm	Site Tour	Inspection of lay-out of facility
3:00pm	Evaluation of compliance (continued)	Interviews with responsible personnel
<b>4:00pm</b>	<b>Time for Auditor to review findings from Day 1</b>	
<b>5:00pm</b>	<b>Close of Day 1</b>	
<b>DAY 2</b>		
<b>9:00am</b>	<b>Follow up any outstanding Audit items from Day 1</b>	<ul style="list-style-type: none"> <li>Relevant records requested by Auditors</li> <li>Key personnel interviews</li> </ul>
9:30am	Evaluation of compliance (continued) <ul style="list-style-type: none"> <li>Slope stability</li> <li>Greenhouse gas emissions</li> <li>Traffic management</li> <li>Net gain management plan</li> <li>Cultural heritage</li> <li>Fire management</li> </ul>	<ul style="list-style-type: none"> <li>Significant Environmental Hazards Register</li> <li>Net Gain Off-set Management Plan</li> <li>Consent to disturb</li> </ul> Interviews with responsible personnel
<b>12:30pm</b>	<b>Lunch</b>	
1:00pm	Evaluation of compliance (continued) <ul style="list-style-type: none"> <li>Water conservation</li> <li>Waste management and minimisation</li> <li>Housekeeping/Preventative maintenance</li> <li>Storage and handling controls</li> <li>Donazzan’s dam integrity</li> <li>Rehabilitation and Revegetation</li> </ul>	<ul style="list-style-type: none"> <li>Significant Environmental Hazards Register</li> <li>Landscape and Rehabilitation Management Plan</li> </ul> Interviews with responsible personnel.
<b>4:00pm</b>	<b>Time for Auditor to review findings from Day 2</b>	
<b>5:00pm</b>	<b>Close of Day 3</b>	

DAY 3		
<b>9:00am</b>	<b>Follow up any outstanding Audit items from Day 2</b>	<ul style="list-style-type: none"> <li>▪ Relevant records requested by Auditors</li> <li>▪ Key personnel interviews</li> </ul>
9:30am	Evaluation of compliance with Licences, permits and other legal requirements	<ul style="list-style-type: none"> <li>▪ Cardinia Shire Council (Council), Planning Permit T050156</li> <li>▪ DPI Work Authority 174</li> <li>▪ EPA Licence No. OL000000544</li> <li>▪ Compliance Planner</li> </ul> Interviews with Site personnel, Council and other relevant Authorities (if required)
10:30am	Review Structure & Responsibility	<ul style="list-style-type: none"> <li>▪ Responsibilities matrix</li> <li>▪ Appointment of Specialists procedure</li> <li>▪ Job Descriptions &amp; Work Instructions</li> </ul>
	Review Training, Awareness & Competence	<ul style="list-style-type: none"> <li>▪ EMP monitoring,</li> <li>▪ Training against Matrix/ Plan,</li> <li>▪ Awareness of appropriate Guideline, Programs, and Records.</li> <li>▪ Employee/Contractor Inductions &amp; Records</li> </ul>
<b>12:30pm</b>	<b>Lunch</b>	
1:00pm	Review Communications	<ul style="list-style-type: none"> <li>▪ SIT and Toolbox meeting minutes,</li> <li>▪ ERC Meeting minutes,</li> <li>▪ Incident Notification Investigations,</li> <li>▪ Complaints Register</li> </ul>
	Monitoring & Measurement	<ul style="list-style-type: none"> <li>▪ Environmental Reporting Procedure</li> <li>▪ Environmental Monitoring Schedule and Records</li> </ul>
	Review of Control of Records	<ul style="list-style-type: none"> <li>▪ Applicable Environmental Records</li> </ul>
	Review of Audits	<ul style="list-style-type: none"> <li>▪ Internal and External Audit Reports / Records</li> </ul>
	Management Review	<ul style="list-style-type: none"> <li>▪ EMP Review Procedure</li> </ul>
<b>3:00pm</b>	<b>Time for Auditor to review findings from Day 2</b>	
<b>4:00pm</b>	<b>EMP Audit Close Out Meeting</b>	
<b>5:00pm</b>	<b>Close of Day 3</b>	

1. Any information/documentation that can be provided in advance of the audit may assist with minimising time spent on site