

Holcim (Australia) Pty Ltd

Rooty Hill Regional
Distribution Centre,
Rooty Hill, NSW

Independent Environmental Audit

March 2025



Document Information

Report Reference: 20241016HOL-RH_IEA

Version: V1.0

Published: 24 March 2025

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Document control

Version	Status	Date
0.1	Final Draft for Client review	13 March 2025
1.0	Final for issue	24 March 2025
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1. Executive Summary

4Pillars Environmental Consulting (**4Pillars**) was engaged by Holcim (Australia) Pty Ltd (**Holcim, the Client**) to undertake an Independent Environmental Audit (**IEA**) at the Rooty Hill Regional Distribution Centre (**the Centre, the RHDC or the Site**), which is a distribution centre for quarried materials located at 21 Kellogg Road, Rooty Hill, NSW, approximately 42 km west of the Sydney CBD. The Site falls within the City of Blacktown Local Government Area (**LGA**).

This IEA Report has been prepared as required by the Project Approval MP05_0051-Mod-2 (see Appendix 2) Condition 3.5A. This is the fourth IEA to be undertaken for the project, and the second for Modification 2 (Mod 2), with previous reports published in 2016, 2018, and 2022 (Mod 2). Condition 3.5A of the Consent as modified requires that an IEA be undertaken *“within a year of the date of the approval of MOD 2, and every three years thereafter, unless the Secretary directs otherwise”*.

The Audit Team was approved by DPHI on 20 November 2024 (NSW Planning ref: MP05_0051-PA-31 (see Appendix 1). This IEA was conducted in accordance with MP05_0051-Mod-2 Condition 3.5A and the NSW Independent Audit Post Approval Requirements, May 2020 (**IAPAR 2020**). The site inspection was conducted on 12 December 2024 and the Site inspection included a records review and key personnel interviews.

Audit Findings Summary

In total, 94 conditions in MP05_0051 MOD2 were assessed as part of this IEA. Of the 94 conditions, 55 were found to be compliant, 3 were non-compliant, and 36 were not triggered.

Key strengths

- Operations-related documentation and record management were-maintained.
- The Site was operating within the approved boundaries and required export/production limits per year.
- No environmental incidents or complaints were recorded during the audit period.
- Environmental mitigation measures were effectively implemented, including water sprays, water cart, sweeping, etc.
- Water management and quality of runoff into Angus and Eastern Creek was of a high standard.
- Real time continuous air quality (dust) monitoring was conducted, demonstrating compliance with air quality management standards and helping to mitigate airborne particulate matter.
- Standards of chemical and liquid storage was of a very high standard and should be commended.
- The design and operation of the refuelling area (diesel tank) was of a high standard. Spill kits were stocked and well maintained.
- Personnel had a sound working knowledge of environmental obligations and procedures.

Recommendations and observations

Three (3) recommendations have been raised to address non-compliances and two (2) observations and opportunities for improvement have also been identified.

Conclusion

The RHDC project is being implemented with a high standard of environmental management. The project is compliant with the vast majority of its approval and operational requirements and the project has a good standing with regulators and the community. The proponent is resourcing the project well and has highly capable personnel overseeing operations and environmental management.

This IEA is the third conducted under MP05_0051 MOD2. It was required within three years of the previous audit. The Consent currently states that subsequent IEAs are to be conducted every three years following this IEA. To ensure compliance with this requirement, **the next IEA should be scheduled to occur prior to 12 December 2027**.

2. Introduction

4Pillars Environmental Consulting (**4Pillars**) was engaged by Holcim (Australia) Pty Ltd (**Holcim, the Client**) to undertake an Independent Environmental Audit (**IEA**) at the Rooty Hill Regional Distribution Centre (**the Centre, the RHDC or the Site**), which is a distribution centre for quarried materials located at 21 Kellogg Road, Rooty Hill, NSW, approximately 42 km west of the Sydney CBD. The Site falls within the City of Blacktown Local Government Area (**LGA**).

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2.1 Project Background

Holcim operates and owns the Rooty Hill Regional Distribution Centre, which is an aggregate storage and distribution facility, primarily for the distribution of construction material into the Greater Sydney market. The construction materials handled include aggregate, sand and concrete, which are sourced from Holcim’s Lynwood Quarry, in Marulan, NSW.

The Major Project (Part 3A) Development Consent (MP05_0051) was granted in 2006 by the Land and Environment Court to construct and operate a distribution centre to receive aggregates by rail from Holcim’s Lynwood Quarry, with operations officially commencing on 1 October 2015. Since this time, two modifications to the original project approval have been approved, in 2011 (MOD 1) and 29 June 2017 (MOD 2). The modifications relate to alterations to the site layout and expansion of the material storage and handling area, respectively. The Mod 2 Consent is active and in force.

2.1.1 Humes Site excluded

Holcim also owns the Site identified as Part Lot 1 DP 582388, which is north of the Site, off Kellogg Road, and identified as the ‘Humes Site’. This Site has a separate Consent (DA05_005) and is operated as a distinct and separate Site to the RHDC. Although certain conditions cross over to the Humes Site (i.e. Condition 2.21), the Humes Site is out of scope for this audit. The physical scope of this Audit and the boundary of the RHDC Site is taken to be the spatial extent of land defined in DA05_0051 Appendix A, Attachment 2, Approved Site Layout (see Figure 1).

2.2 Environmental Approvals

2.2.1 Development Consent(s)

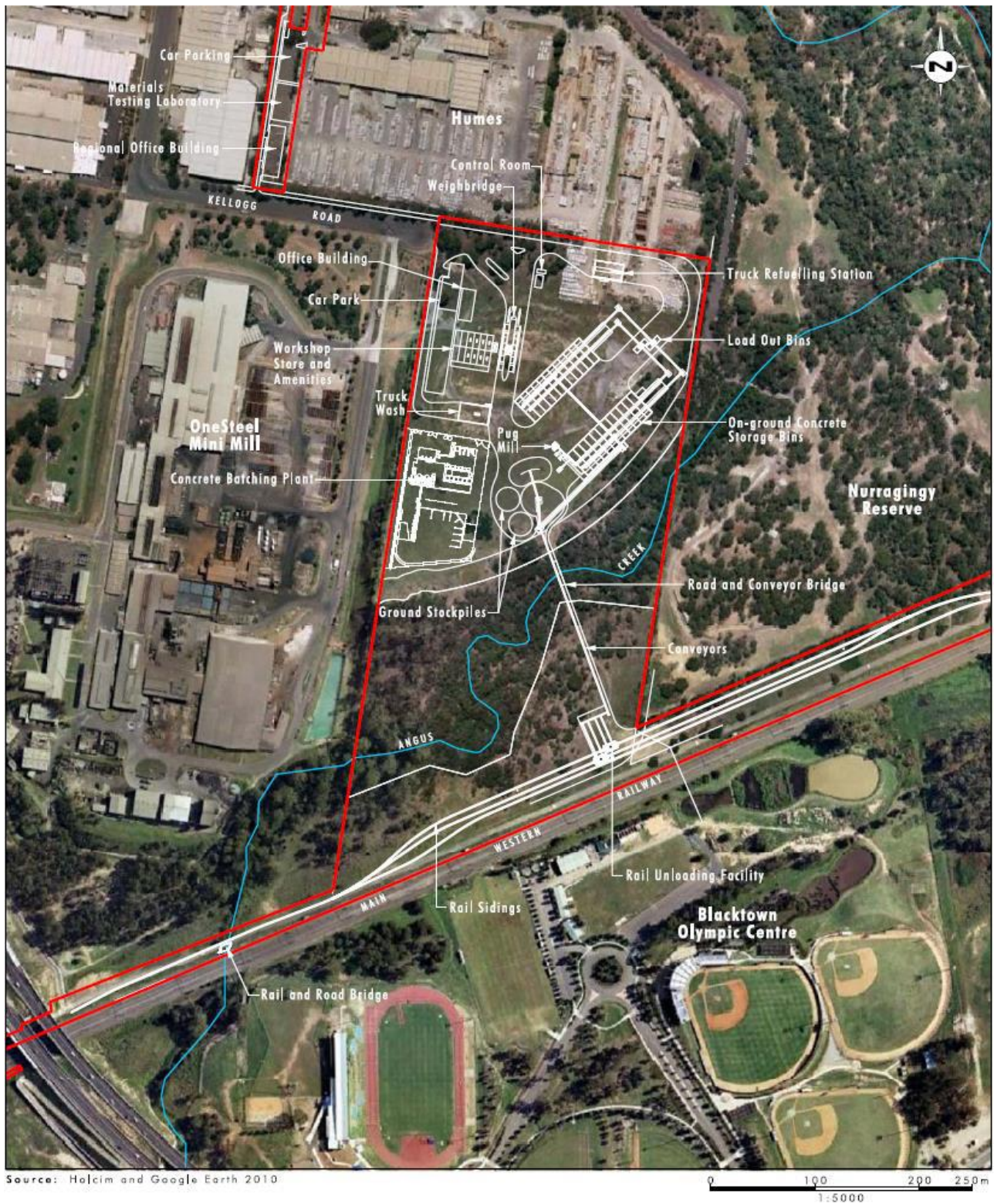
There is one development consent active at the Subject Site.

State significant development consent MP05_0051 MOD 2 (**the Consent or the PA**) was approved on 29 June 2017. The common name of the project is the ‘*Rooty Hill Regional Distribution Centre*’.

The Consent permits the following key activities:

- 4 million tonnes per year of production (aggregates and sands);
- Storage of various aggregates and sand materials awaiting export;
- 200,000 m³ of readymix concrete from an on-site permanent Concrete Batching Plant (**CBP**). The CBP was first established as a temporary facility in 2016 and converted to a permanent facility in 2019.
- 24 hour a day operation.
- Rail siding and unloading facility, with conveyor system.
- Truck parking and facilities, Site offices, truck washdown and refuelling areas, weighbridges and workshop.

The approved site layout is shown in Figure 1.



Legend

Approved RDC Site Boundary

Indicative Modified RDC Layout

FIGURE 1.3
Indicative Modified RDC Layout

Figure 1: Approved development layout from the Consent.

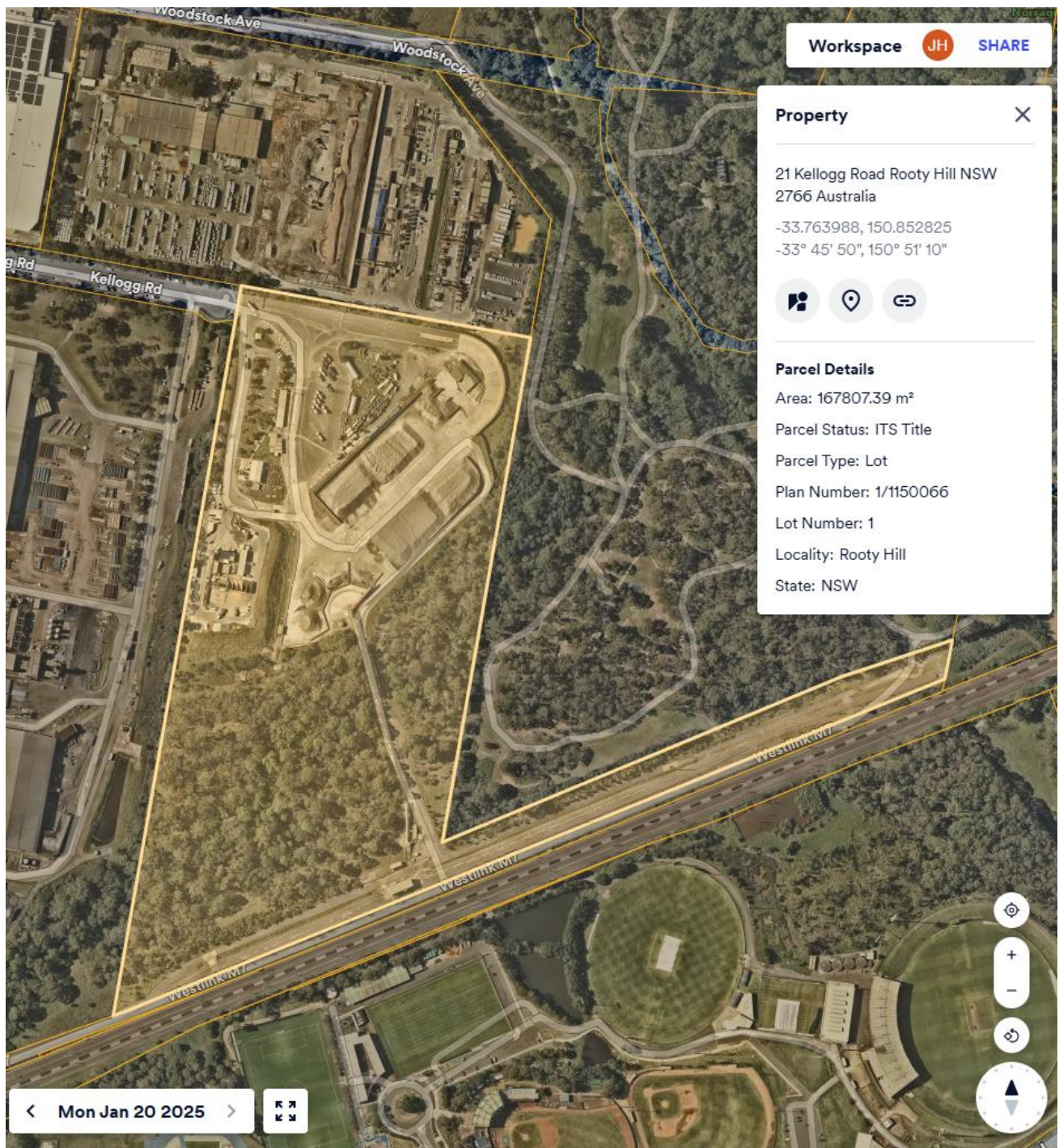


Figure 2: Current aerial imagery of the RHDC and subject lands for this audit.



Figure 3: The northern section of the RHDC, showing the Site entrance, car park, office, truck parking and stockpiles.
Source: Nearmap 2025.



Figure 4: The Southern section of the RHDC, showing the distribution conveyer, holding bays, stockpiles and CBP.
Source: Nearmap 2025.

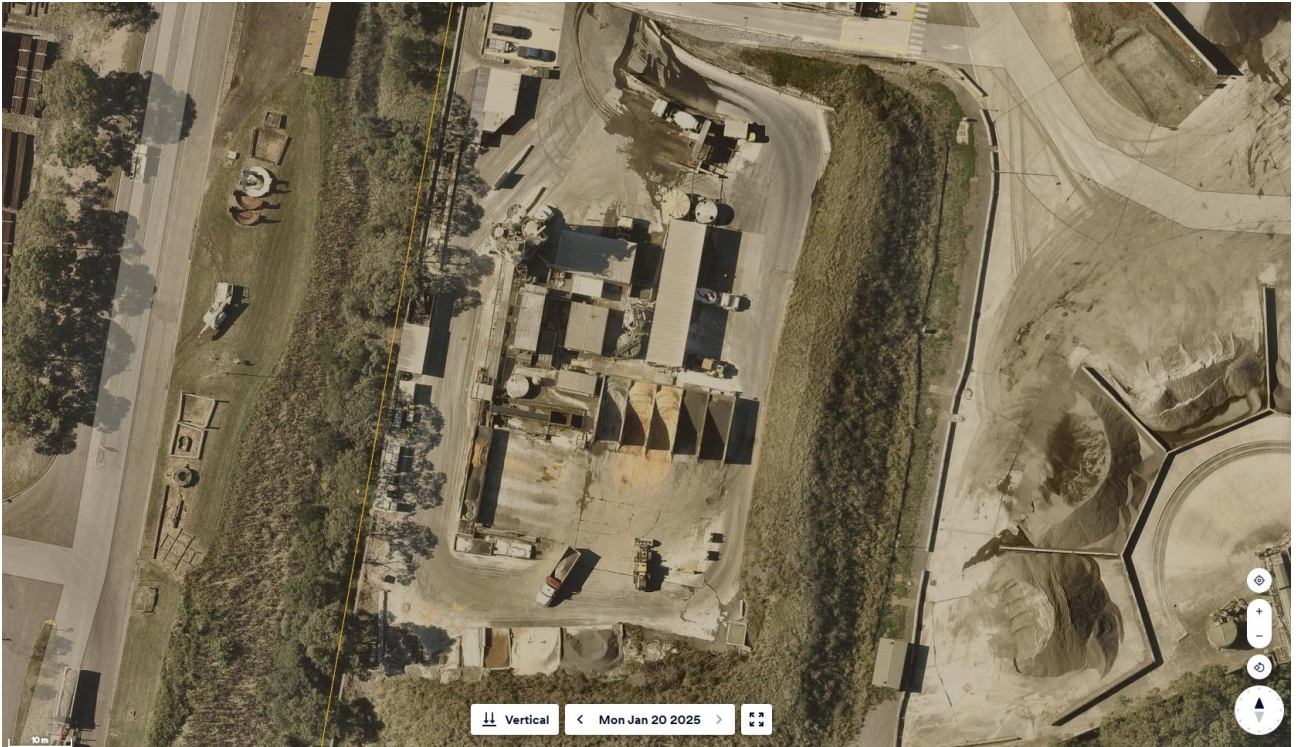


Figure 5: The Concrete Batching Plan (CBP). Source: Nearmap 2025.



Figure 6: The southern area of the RHDC, the rail siding facility and conveyor. Source: Nearmap 2025.



Figure 7: Oblique aerial image of the RHDC main Site and CBP. Source: Nearmap 2024.

2.2.2 Current modifications

No new modifications to the Consent are shown in the Major Projects portal at the time of writing this report.

2.2.3 Environment Protection Licence

The Site does not involve a 'Scheduled Activity' under the *Protection of the Environment Operations Act 1997* and does not currently hold an EPA Licence.

The previous licence for the Site, EPL 20672, was surrendered effective 18 June 2020.

2.2.4 Other documents – assessments, strategies, plans or programs

The following documents are required under Site approvals. All documents are provided as Appendices in Appendix 7.

Table 1: Documents required under Site approvals and assessed as part of the audit scope.

Document	Parent approval
RHDC Operational Environmental Management Plan (OEMP) June 2023 (REV 3.3)	SSD Consent (Various Conditions)

2.3 Audit Team

The Audit Team is presented in Table 2.

Table 2: Audit Team personnel – roles and qualifications.

Name	Company	Role	Qualifications
Annabelle Tungol	Artea Green Ventures Pty Ltd	Lead Auditor	<ul style="list-style-type: none">Bachelor of Science – Chemical EngineeringExemplar Global Certified Master Environmental Auditor and Quality Auditor (#119536)
James Hammond	4Pillars Environmental Consulting Pty Ltd	Technical Specialist	<ul style="list-style-type: none">Bachelor of ScienceMaster of Wildlife Habitat ManagementEIANZ Certified Environmental Practitioner (#794)
Rhys Thompson	4Pillars Environmental Consulting Pty Ltd	Audit Support	<ul style="list-style-type: none">Bachelor of Environmental SystemsMaster of Environmental ScienceMaster of AgricultureEIANZ Certified Environmental Practitioner (#1718)

2.4 Audit Objectives

The primary objective of this IEA is to fulfil the requirements outlined in Condition 3.5A of the PA, which details that the Applicant must commission and pay the full cost of an IEA within one year of the date of approval of MOD2 (29 June 2017) and every three years thereafter. The Audit must be conducted in accordance with Condition 3.5A of the PA and *ISO 19011 Australian/New Zealand Standard: Guidelines for quality and/or environmental management systems auditing*.

Although not explicitly stated in the PA, DPHI confirmed that the IEA is to be conducted with due regard to IAPAR 2020.

2.5 Audit Scope

The scope of this IEA as per the PA and IAPAR 2020, and included the following:

- Consultation with relevant parties.
- An assessment of the environmental performance of the development during the audit period and whether it is complying with the relevant requirements in the PA;
- any assessment, strategy, plan or program required under the abovementioned approval.
- A review of the adequacy of any approved strategy, plan or program required by the PA and the other abovementioned approval(s).

- A recommendation of appropriate measures or actions to improve the environmental performance of the development and any assessment, strategy, plan or program required by the PA and the other abovementioned approvals.
- The status of implementation of previous IEA findings, recommendations and actions (if any).
- A high-level assessment of whether Environmental Management Plans and Sub-plans are adequate; and
- Any other matters considered relevant by the auditor or the Department, considering relevant regulatory requirements and legislation, knowledge of the development's past performance and comparison to industry best practices.

2.6 Audit Period

This IEA covers the period between **18 November 2021 – 12 December 2024**, which is the period from the last IEA to the date of the audit inspection for this audit.

2.7 Project activities

Key project activities that were carried out during the audit period included:

- Receipt and stockpiling of materials;
- Handling of materials and export in heavy vehicles;
- Operation of the CBP; and
- Operation of the rail siding infrastructure.

There have been no changes to the Site layout and no upgrades or modifications to the operating equipment since the last audit.

3. Audit Methodology

3.1 Selection and Endorsement of Audit Team

In accordance with Section 3.1 of IAPAR 2020, Independent Audits must only be undertaken by a suitably qualified, experienced and independent auditor. The PA states the appointment of the auditor, technical experts, and supporting personnel (i.e. all members of the audit team) must be agreed in writing by the Planning Secretary before each audit is commissioned.

The Audit Team was approved by DPHI on 20 November 2024 (NSW Planning ref: MP05_0051-PA-31 (see Appendix 1).

3.2 Audit Scope Development

The audit scope and table were developed by 4Pillars based on the conditions of the PA and other approval documents, as well as the feedback obtained during consultation, which is further discussed in Section 3.5. The full audit table is presented in Appendix 5.

3.3 Audit Process

3.3.1 Opening Meeting

The opening meeting took place on-site on 12 December 2024 at 10:00 am and was attended by the personnel identified in Section 3.3.4. During the meeting, the discussion encompassed:

- Introductions.
- A confirmation of the objectives and scope of the Audit.
- The resources required to conduct the audit.
- The methodology to be applied during the audit, including the three possible compliance status descriptors.
- An update on the current status of the Project and operations;
- An overview of monitoring and reporting requirements; and

- Any environmental incidents, non-compliances raised, or complaints received.

3.3.2 Conduct of Audit

The IEA was conducted in accordance with the guidance presented in IAPAR 2020, with the intent of obtaining an independent and objective assessment of the environmental performance and compliance status of the Project. The following activities were undertaken:

- Request for approval of the Audit Team by DPHI.
- Consultation with three parties including DPHI, NSW EPA, and Blacktown City Council. Specific details regarding consultation are provided in Section 3.5.
- A detailed review of the PA, including the development of the audit table.
- Issuing Holcim with a document request for evidence required to assess compliance with the conditions of the PA.
- Reviewing of the provided documentation, including management plans and any information available online, such as the Major Projects portal, POEO Public Register, Nearmap/aerial imagery, etc. (the **Desktop assessment**).
- Conducting a thorough site inspection and interviews with site personnel to further assess compliance.
- Completion of the audit table based on the findings of the document review, site inspection, and interviews.
- Drafting of the audit report (this report), and discussion of findings with the Client, including communication of recommended actions.
- Completion of the audit report, following the addressing of any comments received from the Client.

3.3.3 Closing Meeting

A closing meeting for the audit was conducted via videoconference on 12 March 2025, attended by the same personnel as the opening meeting. Audit findings were presented, recommendations were discussed, and post-audit actions were confirmed.

The audit team expressed their appreciation to the Client and site personnel for their cooperation during the audit process.

3.3.4 Audit Attendance and Site personnel interviewed

The personnel present during the site inspection, records review and interview are presented in Table 3. The Audit Team personnel present were Annabelle Tungol and James Hammond, as presented in Table 2.

Table 3: Project personnel present during audit.

Name	Company	Position
Michael Ensor	Holcim	Manager, Holcim – RHDC
Dozie Egeonu	Holcim	Environment Manager, NSW & ACT

3.4 Site Inspection

The Site inspection involved a comprehensive review of the entire Site and operations, to assess whether the conditions identified in the audit table and through consultation had been complied with. Aspects that were assessed included (but were not limited to):

- Air quality;
- Soil and water management;
- Biodiversity;
- Noise and vibration management;
- Waste management; and
- Traffic.

Activities at the Site were being carried out during the site inspection. Activities observed included:

- Loading of road trucks.
- Weighbridge operation and outgoing trucks being weighed and exiting the Site.
- Road haulage operation and activity of trucks on local roads.
- Operation of conveyors and the Front End Loader moving stockpiled material.
- Operation of the CBP, filling agitator trucks and blending material in silos.

The findings of the site inspection are elaborated upon in the audit table Appendix 5.

3.5 Consultation

On 22 November 2024, consultation via email was undertaken with DPPI, NSW EPA, and Blacktown City Council (**Council**), to understand whether there were any specific aspects or key focus areas that they wanted to be prioritised or further assessed during the audit.

DPPI was further asked to provide any additional parties or agencies for which consultation was suggested, as per Section 3.2 of IAPAR 2020. No response was DPPI subsequently requested consultation with the Local Aboriginal Land Council/s/Registered Aboriginal Parties, the Former Biodiversity, Conservation and Science Directorate (now proposed to consult with Department of Climate Change, Energy, the Environment and Water (**DECCW**), Transport for NSW (**TfNSW**), Natural Resources Access Regulator (**NRAR**), and Water NSW. These parties were accordingly contacted via email on 3 and 4 December 2024.

A summary of the outcomes of consultation with the above agencies is presented in Section 5.7, with full records (i.e. email correspondence) included in Appendix 6.

3.6 Compliance Status Descriptors

The compliance status of each requirement in the audit table was assessed in accordance with Section 3.8 of IAPAR 2020, with each status and its corresponding description presented in Table 4.

No other terms may be used to describe the compliance status of a requirement (e.g. partially compliant, administrative non-compliance etc.), however observations – including identifying opportunities for improvement – may be noted in the audit table in addition to the compliance status descriptor.

Table 4: Compliance Status Descriptors used in the audit.

Status	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

3.7 Evaluation of compliance

Audit findings are based on verifiable evidence. Multiple lines of evidence are preferable, where they are available (i.e. documents, site observations and interview/anecdotal evidence all indicating the same compliance status). Where there is a discrepancy between different pieces of evidence (i.e. a photo in a report indicates compliance but the site inspection indicates non-compliance) then a 'weight of evidence' approach will be taken, whereby the more compelling or more numerous evidence will be accepted.

Acceptable forms of evidence are:

- Documents, records and reports.
- Correspondence.
- Interviews of Site personnel.
- Anecdotal evidence.

- Photographs (must be able to be dated).
- GIS data, maps and aerial/satellite imagery.
- Site inspections and observations.
- Monitoring data and analysis.
- Delivery records, invoices, receipts and other financial records.

3.8 Documentary evidence file

All pieces of documentary evidence gathered during the audit are presented in Appendix 7. A list of the documents forming the evidence file is provided in the appendix. The evidence file includes many different formats of information and is provided as a digital file. A reader who does not have access to the digital file should contact 4Pillars to request access.

4. Previous Audit findings

A summary of the conditions where a non-compliance was recorded during either the RHDC 2018 IEA or the RHDC 2021 IEA, which were not resolved and remained non-compliant in the 2021 audit, is provided in Table 6. An update has been provided for each item, including whether the condition was found to be complied with in the 2024 audit.

5. 2024 Audit Findings

5.1 Summary of compliance

The level of compliance with requirements assessed in this independent environmental audit is of a high standard, with 97% of requirements 'compliant' or 'not triggered'.

Table 5: Summary of compliance.

Compliance status	Count	%
Compliant	55	59%
Non-compliant	3	3%
Not triggered	36	38%
TOTAL	94	100%

A breakdown of the compliance status of the Project is presented in figures and tables below. The data have been separated into the following parts:

- **MP05_0051 MOD 2**
 - Part 1 – Administrative Conditions
 - Part 2 – Specific Environmental Conditions
 - Part 3 – Environmental Monitoring and Auditing
 - Part 4 – Community information, consultation and involvement
 - Part 5 – Environmental Management
 - Part 6 – Environmental Reporting
 - Attachment 1 – Schedule of Commitments.

Table 6: Assessment of previous audit non-compliance.

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
MP05_0051					
1.1	<p>Terms of approval</p> <p>The Proponent must carry out the project generally in accordance with the:</p> <ul style="list-style-type: none"> a) Project Application 05_0051; b) Environmental Assessment Report ... October 2005; c) Response to Issues Raised in Submissions to EAR...February 2006; d) the final Statement of Commitments, submitted by the Proponent to the Department on 17 March 2006; e) the Environmental Assessment Report – Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), ... October 2010, including the Response to Submissions... 9 December 2010, and the March 2011 Modification Statement of Commitments...; f) the Environmental Assessment Report... February 2017; including the Response to Submissions...16 May 2017; and the conditions of this approval. g) Note: The general layout of the project is shown in Attachment 3. 	<p>2018</p> <p>The CBP and the aggregate storage areas are substantially different from the approved facilities. See Section 4.4 (of the RHDC IEA 2018) for details.</p> <p>Recommendation: actions are taken to ensure that material storage and handling facilities, and the CBP, are constructed and operated as approved. This could be through:</p> <ul style="list-style-type: none"> • amending existing site components and layout to comply with DA 05_0051 (as modified); and/or • seeking advice from relevant government agencies, including DPE and EPA, on achieving compliance with Condition 1.1 of DA 05_0051 (as modified). <p>2021</p> <p>Non-compliant.</p> <p>RHDC IEA 2018 identified that the CBP and the aggregate storage areas are substantially different from the approved facilities. A key issue has been the construction and operation of a temporary mobile CBP, which was inconsistent with approval documentation (refer to Section 5.2.2). Since then, Holcim and DPIE have liaised regarding this matter and Holcim has attempted to rectify this issue. Holcim obtained a Building Certificate for the operation of a mobile/temporary CBP issued by Blacktown City Council on 8 November 2018, as per DPIE's instructions. Subsequently, a Construction Certificate was issued for the permanent CBP on 8 November 2018, after which the permanent CBP was constructed and commissioned. The issue of a Construction Certificate is taken to have resolved the issue of the previously reported difference between the consent drawings and the proposed layout of the CBP, however, an Occupation Certificate has not been sighted during this audit. Aggregate storage areas remain unchanged from the last audit, and it is not clear whether this issue has been resolved.</p> <p>Recommendation: Actions are taken to ensure that material storage and handling facilities are constructed and operated as approved. This could be through:</p> <ul style="list-style-type: none"> • amending existing site components and layout to comply with DA05_0051 (as modified); and or • seeking advice from relevant regulatory agencies, including DPIE and EPA, on reconciling current operations and site infrastructure with Condition 1.1 of DA05_0051 (as modified). The non-enclosure of the materials storage bins is the primary anomaly. This option may include the further modification of the Project Approval. <p>Occupation Certificate must be obtained in order to operate the CBP and associated buildings.</p>	Non-compliant	Compliant	<p>Some non-compliances identified below. Refer to individual conditions. The development is being carried out generally in accordance with the EIS and Development Layout.</p> <p>In line with Department advice regarding this kind of general condition, despite non-compliances with later conditions, we have not noted a non-compliance with this general condition as well. To do so would be to penalise the Proponent twice for the same non-compliance and hence bias the results of the audit.</p>
1.3	<p>The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of:</p> <ul style="list-style-type: none"> a) any reports, plans or correspondence that are submitted by the Proponent in accordance with this approval; and b) the implementation of any actions or measures contained in those reports, plans or correspondence submitted by the Proponent. 	<p>2021</p> <p>Holcim's audit team confirmed that there were no site requirements relating to reports or plans from the Secretary's office that have been issued within the current audit period (29 November 2018- 29 November 2021). Correspondence sighted between DPIE and Holcim regarding the temporary and mobile, as well as permanent, CBP noted requirements to obtain a Building Certificate from Blacktown City Council for the temporary and mobile CBP and a Construction and subsequent Occupation Certificate from a private certifier for the permanent CBP. A Building Certificate was issued for the mobile and temporary CBP by Blacktown City Council on 9 November 2018. A Construction Certificate No. 20190116 was issued on 8 November 2018 by Essential Certifiers for the permanent CBP. However, no Occupation Certificate was sighted as noted in Condition 1.1.</p> <p>Recommendation: refer to Condition 1.1.</p>	Non-compliant	Compliant	<p>Non compliant in previous audit. Holcim's team confirmed that there were no actions arising from the Department's assessment of plans and correspondence.</p>

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
1.8	Management Plans/Monitoring Programs With the approval of the Secretary, the Proponent may prepare and submit any management plan or monitoring program required by this approval on a progressive basis. Where a management plan or monitoring program is required before carrying out the project, or any stage of the project, the plans/ programs may be prepared and submitted in relation to either discrete components of the project or for a specified time period.	2021- See conditions relevant to management plans in regard to compliance relevant to preparation and submission of management plans. It is important to note that both OEMP 2019 and OEMP 2021 were provided during the audit period, however at different stages throughout the audit period, and therefore both have been considered for audit outcomes. It is our understanding that the latest OEMP 2021 was with DPIE for review/approval in accordance with conditions of consent, at the time of this audit. However, correspondence regarding this process has not been sighted during the audit and therefore cannot be verified. OEMP 2021 under the section 'Stakeholder Consultation' notes "during the review and revision of the 2015 OEMP, a draft OEMP was sent to DPIE for approval. Feedback on this Draft OEMP was received on 18 June 2021 and incorporated into this October 2021 OEMP as outlined in Appendix 9." Appendix 9 shows that DPIE comments were addressed. However, any correspondence regarding the OEMP submission or approval have not been verified. Recommendation: refer to response for Condition 5.6.	Non-compliant	Not triggered	Management plans were not completed on a progressive basis during the audit period.
1.13	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA. Notes: Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Project.	2018 The CBP was constructed without a construction certificate and is being operated without an occupation certificate. Holcim has advised that it considers the CBP to be a 'temporary/mobile' plant and plans to install a permanent CBP within the next two years. However, this does not remove the requirement for development approval for the 'temporary/mobile/ CBP. Recommendation: advice is sought from DPE regarding addressing this non-compliance. See Section 4.5 [of RHDC IEA 2018] for details. 2021 Non compliant.	Non-compliant	Compliant	The Occupation Certificate for the CPB has been obtained in this audit. The preceding CC as dated 8/11/2018 and the OC is dated 30/9/2019. No other buildings, temporary or permanent, have been built during the audit period.
2.8	The Proponent must design, construct, commission, operate and maintain the project in a manner that minimises dust emissions from the site, as specified in paragraph of the final Statement of Commitments submitted by the Proponent to the Department on 17 March 2006, including:... b) all storage bins must be enclosed;	2018 The majority of these measures are complied with, however all storage bins are not enclosed. This is addressed in regards to Condition 1.1. Recommendation: see Condition 1.1. 2021 Non-compliant. Storage bins remain open. Site visit observations: a) dust control systems in place, including rail unloading building and dust monitoring stations; b) storage bins are not enclosed as identified and discussed in Condition 1.1; c) water spray system operating over stockpiles; d) street sweeper stationary during visit but trafficable areas generally free of loose material; and e) regular operation of water cart for dust suppression and systems for 3% water addition to incoming raw materials observed. Recommendation: see Condition 1.1 (as relevant to bin enclosure).	Non-compliant	Non-compliant	There continues to be a discrepancy in item (b) the 'enclosure of storage bins'. This is not considered to have a significant environmental impact, as monitoring data is compliant, no dust complaints etc. However, 'bins' as envisaged in the MOD 2 application and other plans were never implemented (we understand there was a design change). This should be addressed, as the Site does not comply with this condition as written. The reference to 'storage bins' has some applicability in the context of the CBP, but is unclear- does it include silos and bays, or both? The 'Indicative Modified RHDC' layout map in Attachment 2 of the consent envisages a pug mill, storage bins in the main yard, conveyors and automated truck loading. The approach that has been taken involves large, open storage bins and manual loading of trucks via FEL. The monitoring data and other lines of evidence (i.e. lack of complaints, observations etc.) suggest the air quality outcomes required at the Site can be achieved based on the current layout; therefore the non-compliance appears to be an administrative one of difference between indicative plans in the Consent and the actual development. This discrepancy should be addressed to minimise regulatory risk for the Proponent.
2.8A	The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 2 at any residence on privately-owned land. Table 2 within Consent.	2021 Holcim operate two HVAS PM10 monitors for the site, which are shown in site photographs of the RHDC IEA 2021 report. The available monitoring reports did not cover the entire audit period (December 2017 – July 2018 and December 2020 to present). However, July 2018 – December 2020 were reported in the 2020 Annual Review. Air quality parameters were exceeded on a few occasions within the audit period: <ul style="list-style-type: none"> 3 and 9 April 2018 as recorded in the INX register. PM10 criteria was exceeded at HVAS 1 on six occasions in 2020, as per the correspondence with DPIE dated 23 August 2021. DPIE noted that several air quality sampling events in 2019 were missed. 2020 Annual Review notes that in 2019, the annual average PM10 at HVAS 1 was greater than the Project Approval criteria, and reported a non-compliance with this condition. 	Non-compliant	Compliant	No exceedances were identified in dust sentry data for 2023 and 2024. However, HVAS results from 2022 and 2023 exceeded criteria on several occasions. In most cases, other evidence (i.e. meteorological conditions) indicate that the RHDC did not, or was unlikely to have, contributed to the exceedances. The audit team also notes that the criteria apply at residences on privately owned land. The closes residence is several hundred meters away from the Site. No attenuation has been incorporated into the analysis of data that is obtained at the boundary of the Site, so we note that the approach to assessing compliance with this condition is conservative. Noting the discrepancy regarding 'bin enclosure' per Condition 2.8, the design of the Site has not progressed as envisaged in the initial RHDC design. This broader matter of compliance with the general design of the facility has been addressed above in a non-

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
		<ul style="list-style-type: none"> A few incidents of excessive dust were recorded in the INX register (6 September 2019, 17 October 2019), however no air quality or dust complaints were received during the audit period. <p>Recommendations: continue with best practice dust and air quality management onsite and look into options to enclose product bin storage areas as conceptualised in the initial RHDC design. Refer to Condition 1.1 for further details.</p>			<p>compliance with Condition 2.8. On the weight of evidence, the reasonable and feasible mitigation measures that can be implemented at the Site are being implemented and the audit team is satisfied this condition and its intent is complied with.</p> <p>Observation: Continue with best practice dust and air quality management on-site, and look into options to enclose product bin storage areas as conceptualised in the initial RHDC design, or modify the project approval to remove this requirement. Refer to Condition 2.8 for further details.</p>
2.21A	<p>The number of on-site and truck parking spaces to be provided for the project must be in accordance with Sections 5.4.3, 5.4.4 and 5.4.6 of the EAR as follows:</p> <ol style="list-style-type: none"> Truck parking: 50 spaces (truck and dog configuration); Car parking: a total of 310 spaces on the project site and Humes site, as follows: Project site: 121 spaces; Regional office and laboratory: 189 spaces, of which 84 are to be allocated to the project site staff and visitors and 105 are to be allocated to the staff and visitors to the existing Humes site. All car parking spaces must be marked/signposted in accordance with the above allocations. All visitor spaces must be located conveniently in relation to the various administrative offices on the site and must be clearly marked and signposted. All car and truck parking spaces must be sealed in a hardstanding material and drained in accordance with the approved stormwater management plan for the project; The design and dimensions of all truck and car parking spaces, together with all associated roads and manoeuvring areas, must be in accordance with AS2890.2 (2002); A detailed car and truck parking plan, at a scale of 1:200, and incorporating the above requirements, must be submitted for the approval of the Secretary prior to the commencement of any works. 	<p>2018 This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit on 12 December 2017. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> there are approximately 14 delineated truck (and dog) parking spaces currently, with some provision for more parking once construction of the remaining components are completed; there are approximately 38 delineated car parking spaces provided adjacent the site office/administration; all light vehicle parking spaces are clearly delineated; all parking areas sealed and drained to the site stormwater system; there are no dedicated parking spaces for trucks in the CBP area; and truck and vehicle turning and manoeuvring areas appear to be constructed in accordance with the AS2890.2 (2002). A letter from Department of Planning and Infrastructure (7 December 2012, ref- 10/22440) approves truck and car space requirement reductions, however this predates the MOD2 condition. Holcim is reducing its vehicle fleet and using contractor-owned and contractor-operated heavy vehicles- these do not park at the RHDC. <p>Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently. It is understood that Holcim do not propose to develop the regional office and laboratory site. Therefore, these 189 spaces will not be required.</p> <p>Recommendation: the number of required parking sites should be modified.</p> <p>2021 This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit on 17 November 2021. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> there are approximately 14 delineated truck (and dog) parking spaces currently; there are approximately 38 delineated car parking spaces provided adjacent the site office/administration (including 2 disabled); all parking areas sealed and drained to the site stormwater system; truck and vehicle turning and manoeuvring areas appear to be constructed in accordance with the AS2890.2 (2002). Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently. It is understood that Holcim do not propose to develop the regional office and laboratory site. Therefore the 189 spaces will not be required. <p>Recommendation: the Project Approval should be modified to reflect the number of required parking sites in the absence of a laboratory facility being constructed on site.</p> <p>Recommendation: the Project Approval should be modified to reflect the number of required parking sites in the absence of a laboratory facility being constructed on site.</p>	Non-compliant	Non-compliant	<p>This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit on 17 November 2021. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> there are approximately 14 delineated truck (and dog) parking spaces currently; there are approximately 38 delineated car parking spaces provided adjacent the site office/administration (including 2 disabled); all parking areas sealed and drained to the site stormwater system; truck and vehicle turning and manoeuvring areas appear to be constructed in accordance with the AS2890.2 (2002). Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently. <p>It is understood that Holcim do not propose to develop the Regional office and laboratory site. Therefore the 189 spaces will not be required.</p>

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
2.26	Immediately after completion of initial planting/seeding and every year thereafter for the duration of the maintenance period the Proponent must submit to the Department a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.	<p>2018 It is unknown whether the required monitoring report has been submitted to DPE.</p> <p>Recommendation: the monitoring reports should be submitted to DPE, including certification that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.</p> <p>2021 There is no evidence that any of the monitoring reports were submitted to DPIE as per the requirement of this condition.</p>	Non-compliant	Compliant	Initial plantings were completed in October 2017. The five year minimum maintenance period, and associated conditions expired in October 2022. The Proponent may intend to continue to carry out maintenance and/or monitoring on a voluntary basis and can articulate this in later versions of the Vegetation Management Plan, contained in the OEMP. Reports available for 2022 confirm monitoring and maintenance was conducted until at least end of 2022. Revegetation monitoring reports for 2023 and 2024 were not sighted, but were not required to demonstrate compliance.
3.2	<p>The Proponent must review the Operational Monitoring Program referred to under Condition 3.1 on a six-monthly basis, and may, with the agreement of the Secretary, alter the frequency and/or scope of monitoring provided:</p> <ol style="list-style-type: none"> pollutant/perimeter monitoring has been undertaken for a period of no less than six months (measured from the commencement of operation of the project); there has been no exceedance of any limit placed on the subject pollutant or parameter, through this consent or any Environment Protection Licence under the <i>Protection of the Environment Operations Act 1997</i> within the preceding six-month period; there has been no reasonable complaint received from the public in relation to the subject pollutant/parameter within the preceding six-month period (refer to Condition 4.3 of this approval); and the EPA raises no objection to the proposed alteration to the frequency of pollutant/parameter monitoring. 	<p>2018 There is no evidence that the Operational Monitoring Program has been reviewed on a six-monthly basis.</p> <p>Recommendation: the Operational Monitoring Program should be reviewed following finalisation of this audit and every six months thereafter.</p> <p>2021 There is no evidence that the Operational Monitoring Program has been reviewed on a six-monthly basis. Same recommendation remains.</p>	Non-compliant	Compliant	<p>Anecdotal evidence from Holcim staff indicate that management plans are reviewed for any necessary changes on at least a 6 monthly basis. The audit team was able to obtain documentary evidence for some 6 monthly periods (i.e. July 2024), but not others.</p> <p>In some instances where a review is conducted and there are no changes needed, it appears that if the Proponent does not require any changes to the document, that a record is not created of that process. The audit team is satisfied that the documents are being regularly reviewed and updated, reflect the Site operations and better practice and are fit for purpose. An observation has been raised for this item that relates to improving documentation.</p> <p>Observation: Suggest a standard periodic review checklist or similar document is developed and used for any routine review of the approved management plans. Updating the version tracking within management plans is not recommended, as it will trigger a need to seek Department approval of the revised number plan again.</p>
3.5A	<p>Within a year of the date of the approval of MOD 2, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and commence, and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ol style="list-style-type: none"> be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; include consultation with the relevant agencies; assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals); 	<p>(a) to (e) has been fulfilled.</p> <p>MOD2 was approved on 29 June 2017. The previous audit (undertaken for the period 31 March 2016 to 12 December 2017) notes "Given that the majority of the audit period was prior to the approval of MOD2, Condition 3.5 has been applied. However, it is noted that agencies were consulted as part of this audit." There is no evidence that an audit was undertaken within a year of the date of the approval of MOD2, and thus the current audit period is from 13 December 2017 – 17 November 2021. No evidence of the Secretary making available alternative arrangements. EMM Consulting was commissioned to undertake this independent environmental audit on 19 May 2021 (purchase order 4520690232), and activities officially commenced in the week of 16 August 2021. The site inspection was delayed due to State Government public health orders issued during the Covid-19 pandemic lockdown in the Greater Sydney Area. Holcim emailed DPIE on 23 November 2021 notifying DPIE about the delay and seeking an extension for the audit.</p> <p>Recommendation: The next audit should take place three years after this audit (i.e. November 2024).</p>	Non-compliant	Compliant	<p>MOD2 was approved on 29 June 2017. The due date for the first audit was therefore 29 June 2018. An audit was conducted by EMM for the period to 12 December 2017 (published in 2018). MOD2 was approved on 29 June 2017. The previous audit (undertaken for the period 31 March 2016 to 12 December 2017) notes "Given that the majority of the audit period was prior to the approval of MOD2, Condition 3.5 has been applied. However, it is noted that agencies were consulted as part of this audit." The 2022 EIA found that this condition had not been complied with during that audit period.</p> <p>The due date for the next audit was 12 December 2020. However, the audit was delayed to 17 November 2021 due to Covid-19 restrictions. This was communicated to and agreed to by the Department. The 2022 IEA stated that the next audit was identified as falling due in November 2024.</p> <p>However, the audit team notes verbal advice from DPHI to the Proponent, and standard practice in other similar situations, is to revert to the original audit timing in the event of an interruption that causes an audit that is out of sync.</p>

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
	d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and f) f) be conducted and reported to the satisfaction of the Secretary.				When this is considered, the due date for completing the audit would be 3 years since the previous one, but reverting to the original date. This gives an audit due date of 12 December 2024. This audit was conducted on 12 December 2024, which is compliant with the Condition. Observation: The next audit should take place three years after this audit (ie on or before 12 December 2027).
3.5B	Within 12 weeks of commencing an audit under condition 3.5A, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.	2021 Site audit was delayed due to Covid-19 restrictions. Holcim emailed DPIE on 23 November 2021 notifying DPIE about the delay and seeking an extension for the audit.	Non-compliant	Non-compliant	The previous audit was conducted on 17 November 2021 and the report was finalised 22 March 2022. The date of the audit report is 4 months and 5 days after the audit was commenced. The previous audit refers to a letter sent to the Department in November 2021 requesting an extension- It has not been established whether that extension request included an extension to the due date for submission, or if another item of correspondence exists.
5.1	Prior to the commencement of site preparation works, the Proponent must nominate a suitably qualified and experienced Environmental Representative(s) whose appointment is to receive prior approval of the Secretary. The Proponent must employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary, during the operations at the site. The Environmental Representative must be: ...The Proponent must notify the Secretary of any changes to that appointment that may occur from time to time.	2018 During the previous audit, a letter from the Department of Planning and Infrastructure (19 November 2015) advising of approval for the appointment of Mr Brian Cassel as the new environmental representative for the site (previously Mr George Poljak) was sighted. The Secretary has not been informed of the change to Rochelle Zammit. Recommendation: the Secretary should be informed of changes to Environmental Representative(s) appointments. 2021 There is no evidence that DPIE has been advised of the approval of the appointment of the new site's environmental representative (Ms. S. Shashi and Ms. R. Flack). Same recommendation remains.	Non-compliant	Compliant	Environmental representatives have been nominated to the Department and acknowledgement received. The representatives nominated remain the representatives at the date of the audit.
5.2	The Proponent must prepare and implement a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during the site preparation and construction activities during each stage of the project....	2018 The Stage 2 CEMP indicates that possible future construction as Stage 3 includes the CBP and a blending/pug mill. Both of these facilities were constructed in the audit period but are not specifically covered by a CEMP. It is noted that no complaints were registered during the construction of these facilities. Recommendation: the CEMP should be updated prior to any future building works. 2021 There is no evidence that a CEMP was prepared for the construction of the permanent CBP.	Non-compliant	Not triggered	Previously, non-compliances were raised in relation to lack of evidence of CEMPs for activities (i.e. CBP construction). Any previous non compliances are taken to be closed. No construction was conducted during this audit period and therefore this condition has not been triggered for the purposes of this audit.
5.3	As part of the Construction Environmental Management Plan for the project, required under Condition 5.2 of this approval, the Proponent must prepare and implement the following Management Plans: (Refer to condition for full list)	2021 Refer to response to Condition 5.2.	Non-compliant	Not triggered	Previously, non-compliances were raised in relation to lack of evidence of CEMPs for activities (i.e. CBP construction). Any previous non compliances are taken to be closed. No construction was conducted during this audit period and therefore this condition has not been triggered for the purposes of this audit.
5.6	Within 3 months of the submission of an: a) incident report under condition 6.1 below; b) Annual Review under condition 6.3 below; c) Independent Environmental Audit under Condition 3.5 or condition 3.5B above; and d) any modifications to this consent, The Proponent must review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review	2021 OEMP 2021 is currently under review by DPIE and has not been endorsed yet. This audit has identified that management plan(s) and Annual Review(s) are not being completed and submitted to DPIE within the timeframes specified in the conditions. Recommendation: annual Reviews, management plans and monitoring programs need to be prepared and/or updated in accordance with the timeframes specified in conditions of consent. Annual Reviews, management plans and monitoring programs need to be submitted to DPIE and other relevant	Non-compliant	Compliant	There were no incidents during the audit period. There was a previous IEA and several annual reviews in the audit period that triggered this requirement. Anecdotal evidence from Holcim staff indicate that management plans are reviewed for any necessary changes on at least a 6 monthly basis. The audit team was able to obtain documentary evidence for some 6 monthly periods (i.e. July 2024), but not others. In some instances where a review is conducted and there are no changes needed, it appears that if the Proponent does not require any changes to the document, that a record is not created

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
	being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary. Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.	government agencies, as specified in conditions of consent (and records kept regarding dates that documents were sent to DPIE).			of that process. The audit team is satisfied that the documents are being regularly reviewed and updated, reflect the Site operations and better practice and are fit for purpose. An observation has been raised for this item that relates to improving documentation. Observation: Refer to observation at Condition 3.2.
5.7	Where consultation with any public authority is required by the conditions of this consent, the Proponent must: a) consult with the relevant public authority prior to submitting the required document to the Secretary for approval; b) submit evidence of this consultation as part of the relevant document; c) describe how matters raised by the authority have been addressed and any matters not resolved; and d) include details of any outstanding issues raised by the authority and an explanation of disagreement between any public authority and the Proponent.	2021 As per outcomes of Condition 5.6, consultation has not taken place in accordance with timelines specified in the consent. There is no evidence of formal tracking system for matters raised by authorities.	Non-compliant	Compliant	There is no requirement within the consent or other approval documents for consultation with public authorities when developing the OEMP.
6.3	Annual Performance Reporting The Proponent must, throughout the life of the project, prepare and submit to the Secretary, an Annual Review. The Annual Review must review the performance of the project against the Operation Environmental Management Plan (refer to Condition 5.4 and Condition 5.5 of Annual Review must include, but not necessarily be limited to: a) details of compliance with the conditions of this approval; b) a copy of the Complaints Register (refer to condition 4.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were address and resolved; c) a comparison of the environmental impacts and performance of the project against the environmental impacts and performance predicted in those documents listed under Condition 1.1 of this approval; d) results of all environmental monitoring required under this approval and other approvals, including interpretations and discussion by a suitably qualified person; and e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the project have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident.	2021 DPIE noted that Holcim "failed to submit the Annual Review for the reporting periods from 1 July 2018 to 31 June 2019 and 1 July 2019 to 31 June 2020 in accordance with Condition 6.4 of the approval and advises that this non-compliance will be followed up separately by the Department." Recommendation: as per DPIE's advice, the Annual Reviews on the calendar year basis with the 2021 Annual Review should be submitted in March 2022.	Non-compliant	Compliant	As per DPIE's advice, the Annual Reviews on the calendar year basis. This has been the case with 2022 and 2023 annual reviews, and will be so for 2024.

Condition of consent	Requirement	Comments/Findings in previous audits	Compliance status in 2021 IEA	Compliance status in 2024 IEA	Comments
6.4	The Proponent must submit a copy of the Annual Review to the Secretary, EPA and Council every year, with: i. the first Annual Review to be submitted within twelve months after the commencement of operation of the project; and ii. the second and subsequent Annual Review to be submitted concurrently with the EPA's Annual Return.	2021 Refer to response to Condition 6.3.	Non-compliant	Compliant	There is no longer an EPL in force, hence the requirement to submit the annual review at the same time is not possible. Rather the proponent has fallen back on DPIE advice to submit on a calendar year basis, with the report due three months after year end.
6.4	The Proponent must make the Annual Review available to the public for inspection upon request.	2021 All Annual Review reports with the exception of Annual Review 2017 have been uploaded to the Holcim RHDC webpage. Recommendation: refer to Condition 4.1. (i.e. All Annual Review reports should be uploaded to the website).	Non-compliant	Compliant	The 2021, 2022 and 2023 reviews have been sighted on the Company Webpage.
6.5	The Secretary may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report in relation to compliance with this approval and any comments received from the EPA and/or Council. Any reasonable action required to be undertaken must be completed within such period as the Secretary may agree.	2021 DPIE notes the incidents regarding exceedance of air quality criteria, however no timelines are given for taking action. As per DPIE correspondence, "onsite monitoring is required to be undertaken in accordance with the approval and any associated Management Plans, as approved by the Planning Secretary. Any amendments to the parameters required to be monitored, including monitoring frequencies and locations are to be included in the amended respective Management Plans and submitted to the Planning Secretary for approval, prior to implementation." Recommendation: air quality non-compliances noted in the Annual Review 2020 and in DPIE's Letter should be addressed. Annual Reviews, management plans and monitoring programs need to be prepared and/or updated in accordance with the timeframes specified in conditions of consent. Annual Reviews, management plans and monitoring programs need to be submitted to DPIE and other relevant government agencies, as specified in conditions of consent (and records kept regarding dates that documents were sent to agencies).	Non-compliant	Not triggered	There have been no such requests from the Secretary during the audit period.
Schedule of Commitments					
1	To carry out the project generally in accordance with the documents listed in Condition 1.1.	2018 See DA 05_0051 Condition 1.1. 2021 Remains non-compliant. Refer to DA 05_0051 Condition 1.1	Non-compliant	Compliant	Some non-compliances identified below. Refer to individual conditions. The development is being carried out generally in accordance with the EIS and Development Layout. In line with Department advice regarding this kind of general condition, despite non-compliances with later conditions, we have not noted a non-compliance with this general condition as well. To do so would be to penalise the Proponent twice for the same non compliance and hence bias the results of the audit.
EPL Surrender					
2(c)	The content and form of the Annual Return must be in accordance with the applicable reporting conditions in the licence before it was surrendered.	2021 Not verified.	Non-compliant	Compliant	The POEO Public Register confirms that an annual return was submitted in the required form covering the period 28 September 2019 to 18 June 2020. It was received by the EPA on 10 August 2020. No non-compliances were reported in the return.
2(d)	The Annual Return must be signed in accordance with the applicable reporting conditions in the licence before it was surrendered.	2021 Not verified.	Non-compliant	Compliant	The POEO Public Register confirms that an annual return was submitted in the required form covering the period 28 September 2019 to 18 June 2020. It was received by the EPA on 10 August 2020. No non-compliances were reported in the return.

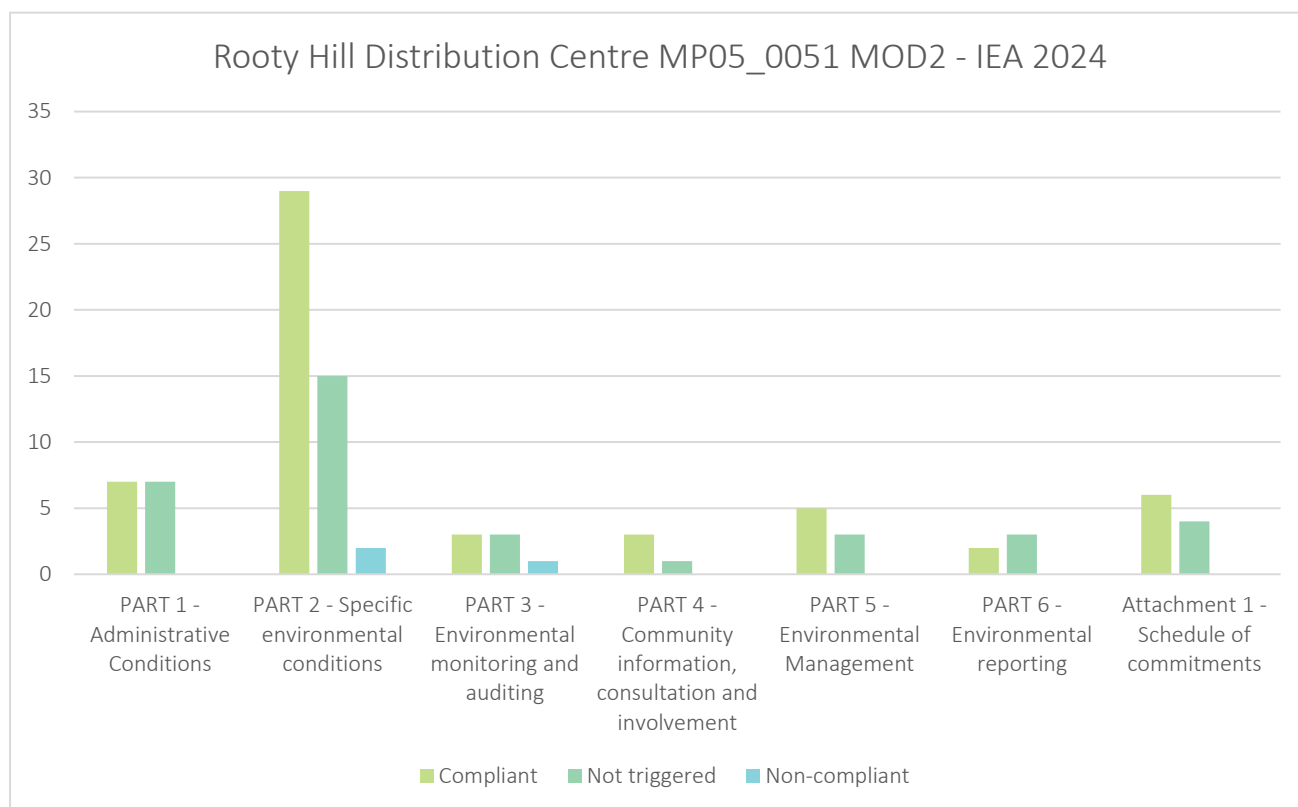


Figure 8: Summary of compliance –conditions of Consent.

Table 7: Breakdown of compliance status MP05_0051 MOD 2.

SSD Project Approval	Compliant	Not triggered	Non-compliant	TOTAL
PART 1	7	7	0	14
PART 2	29	15	2	46
PART 3	3	3	1	7
PART 4	3	1	0	4
PART 5	5	3	0	8
PART 6	2	3	0	5
Schedule of commitments	6	4	0	10
TOTAL	55	36	3	94
%	59%	38%	3%	100%

5.2 Summary of non-compliances during the Audit Period

There were three (3) non-compliances identified during the Audit Period. Further commentary is provided below.

5.2.1 MP05_0051 MOD 2 Condition 2.8

There continues to be a discrepancy in item (b) the 'enclosure of storage bins'. This is not considered to have a significant environmental impact, as monitoring data is compliant, no dust complaints etc. However, 'bins' as envisaged in the MOD 2 application and other plans were never implemented (we understand there was a design change). This should be addressed, as the Site does not comply with this condition as written. This condition relates to air quality and although actual air quality performance of the Site is compliant with outcome-based conditions of consent, this condition mandates a specific form of mitigation.

Recommendation 1. The Proponent should consider the most appropriate method to comply with the requirements of this condition. The key options include installation of equipment (i.e. bays/bins, conveyors etc) as envisaged in the Consent, formal communication with the Department regarding the works as executed plan for the Site, or modify the project approval to remove this requirement.

5.2.2 MP05_0051 MOD 2 Condition 2.21A

This condition has not been met at this stage, as construction of all approved components (eg laboratory) has not been completed. The number of car spaces on the RHDC Site is also lower than specified in this condition. The audit team understands the Proponent does not have any need or intention to install the additional car spaces as originally envisaged in the Consent. The number of spaces provided for the Site are adequate and the last three years of aerial imagery suggests there are generally ample excess spaces for both cars and trucks.

Recommendation 2. The Proponent should consider the most appropriate method to comply with the requirements of this condition. The key options include installation of equipment (i.e. bays/bins, conveyors etc) as envisaged in the Consent, formal communication with the Department regarding the works as executed plan for the Site or modify the project approval to remove this requirement. See also Recommendation 1.

5.2.3 MP05_0051 MOD 2 Condition 3.5B

The previous audit was conducted on 17 November 2021 and the report was finalised 22 March 2022. The date of the audit report is 4 months and 5 days after the audit was commenced. The previous audit refers to a letter sent to the Department in November 2021 requesting an extension- It has not been established whether that extension request included an extension to the due date for submission, or if another item of correspondence exists.

Recommendation 3. Future audit lodgements to be within 12-week period, or as otherwise agreed by the Secretary.

5.3 Notices, Orders, Penalty Notices or Prosecutions

There were zero (0) notices, orders, penalty notices, or prosecutions issued during the Audit Period.

5.4 Complaints

A complaints register is maintained by the Proponent and published on their website quarterly, as required.

No complaints were recorded on the register during the Audit Period.

5.5 Incidents

There were zero (0) incidents during the Audit Period.

5.6 Environmental management plans, sub-plans and compliance documents

Approved environmental management plan(s) were assessed as part of this IEA. The management plans are referenced in the audit table and itemised in Section 2.2.4 above and the evidence file at Appendix 7. The sub plans referenced in the PA are integrated into the Operational Environmental Management Plan (OEMP).

The appropriate implementation of the approved management plan(s) for the project has been verified during this audit through multiple lines of evidence, which are detailed for specific management plans in Appendix 5.

In accordance with Condition 5.6 of the PA, all management plans and programs are to be reviewed within three months of:

- a) the submission of an incident report under condition 6.1;
- b) the submission of an Annual Review under condition 6.3;
- c) the submission of an Independent Environmental Audit under condition 3.5 or 3.5B; or
- d) the approval of any modification of the conditions of this consent.

During the audit period, an IEA report was submitted and three Annual Reviews were submitted (four triggers). No other triggers were identified. We understand that plans were reviewed following these triggers. Although the audit team is satisfied that review points are occurring, documentary evidence would eliminate any risk of uncertainty in any future audits or a different audit team having a differing opinion (refer to the observation in Table 10 relating to reviews).

The environmental performance of the Site is of a high standard and the proper and efficient implementation of the management plans is supporting this outcome. Monitoring data, the standard of environmental controls (as demonstrated through site observations) and the lack of community complaints and regulatory action is also a testament to this.

5.7 Consultation with the Department and stakeholders

Table 8, below, presents the results of the consultation process and the feedback received from the contacted stakeholders, including those requested by DPHI. Initial consultation emails were issued on 22 November 2024. A copy of the stakeholder feedback is provided in Appendix 6. The aspects requested to be assessed by the stakeholders were taken into consideration during the completion of the audit. Where they were additional to items covered in other requirements (i.e. the Consent) they have been added to the audit table in Appendix 5.

Table 8: Summary of consultation undertaken.

Stakeholder	Main aspects raised	Response to comments
DPHI	No response was received from DPHI before the completion of the IEA.	NA
Blacktown City Council	a. Council had no additional focus areas or matters requiring prioritisation, other than the prescribed Audit Scope and relevant legislative requirements. b. Council did request confirmation of conditions from a 2 August 2024 letter, however on review it was identified that this was for a neighbouring site (OneSteel) and therefore not relevant to the IEA.	NA
NSW EPA	a. The NSW EPA noted that the EPL for the site had been surrendered in 2020, and that it holds no recent information about its environmental performance. The EPA noted that it generally does not provide input to IEAs, and that we were engaging with Council, who are the appropriate regulatory authority.	NA

5.8 Other matters considered relevant by the Auditor or the Department

No other matters have been identified in the course of the audit.

5.9 Assessment of actual and predicted impacts

As an older Part 3A approval, the original 2005 environmental impact assessment for the project was not available to the audit team for review and the MOD 2 environmental assessment covered only those issues relevant to the modification scope. Therefore, the assessment of predicted impacts has been based on a review of available environmental impact assessment documents and the scope of controls included in the Schedule of Commitments appended to the PA.

Table 9: Assessment of actual impacts, based on controls specified in the Schedule of Commitments.

Aspect	Summary of key potential impacts	Summary of actual impacts during the audit period	Consistent (yes/no?)
Noise	Minimal risk of impacts on residential receivers and no sleep disturbance expected. Minimal or no nuisance impacts on users of the nearby Nurrangy Reserve.	There is no evidence of noise impacts on the surrounding community. Routine noise monitoring is compliant, there have been no issues relating to noise raised by regulatory authorities and no noise complaints. No complaints relating to sleep disturbance or audible noise at night, or due to road/truck noise.	YES
Air quality	No dust or particulate impacts on nearby residential receivers or recreational receivers.	Air quality monitoring demonstrates a good compliance record. The use of real-time monitors allows alerts to be sent to the Site Manager in the event of exceedances, so corrective action can be taken as needed. No air quality or dust complaints have been received and air quality controls, such as misting systems and the water cart were observed to be operating during the Site inspection. The hardstand areas are visibly moist in some aerial images from prior years.	YES

Aspect	Summary of key potential impacts	Summary of actual impacts during the audit period	Consistent (yes/no?)
Ecology	Minimal disturbance of vegetation, net improvement to vegetation condition around the site through revegetation and maintenance, offsets to address the residual impact of clearing.	Plantings have been well established and the required 5-year maintenance period has now been completed. The Proponent may consider what future vegetation management measures are appropriate in future revisions of the OEMP. The project has not exceeded its approved clearing footprint and no observable impacts on water quality and aquatic biota have been reported in specialist monitoring reports.	YES
Water Resources	Minimal impact on water quality of Angus Creek and downstream at Eastern Creek. No impediment of flow or aquatic fauna movement and habitat.	Water quality does fluctuate in Angus Creek, however, there are no observable impacts due to the Site. The creek crossing is well maintained and culverts are free of debris and other material that may impede flow. Water quality continues to be monitored on a regular frequency.	YES
Greenhouse	Reduction in greenhouse gas footprint compared to baseline do nothing scenario, by implementing viable reduction measures.	Holcim has a broader greenhouse gas and sustainability framework that encompasses the RHDC. This program aims to reduce GHG emissions across the business.	YES
Visual	No significant impact on the visual amenity of the area and the Site, as viewed from residential and recreational users in the area.	The Site is visually sympathetic and neutral in colour and tone. The Site is not readily observable from most residential and recreational vantage points in the area.	YES
Hazard	Risk reduction as low as reasonably possible and robust incident response to avoid or minimise adverse impacts.	The Site is designed and maintained well. Incident response procedures and incident response equipment (i.e. spill kits, fire control equipment) are available. The Site does not store significant quantities of hazardous material.	YES

5.10 Site Inspection Commentary

Commentary and observations from the Site Inspection conducted on 12 December 2024 are provided in Appendix 5 as they relate to specific requirements. Relevant photographs taken during the inspection are provided in Appendix 7.1.

5.11 Key Strengths and Environmental Performance

- Operations-related documentation and record management were-maintained.
- The Site was operating within the approved boundaries and required export/production limits per year.
- No environmental incidents or complaints were recorded during the audit period.
- Environmental mitigation measures were effectively implemented, including water sprays, water cart, sweeping, etc.
- Water management and quality of runoff into Angus and Eastern Creek was of a high standard.
- Real time continuous air quality (dust) monitoring was conducted, demonstrating compliance with air quality management standards and helping to mitigate airborne particulate matter.
- Standards of chemical and liquid storage was of a very high standard and should be commended.
- The design and operation of the refuelling area (diesel tank) was of a high standard. Spill kits were stocked and well maintained.
- Personnel had a sound working knowledge of environmental obligations and procedures.

6. Observations and Recommendations

In total, 94 conditions in MP05_0051 MOD2 were assessed as part of this IEA. Of the 94 conditions, 55 were found to be compliant, 3 were non-compliant, and 36 were not triggered.

There were no other compliance requirements within the scope of the audit.

This IEA is the third conducted under MP05_0051 MOD2. It was required within three years of the previous audit. The Consent currently states that subsequent IEAs are to be conducted every three years following this IEA. To ensure compliance with this requirement, **the next IEA should be scheduled to occur prior to 12 December 2027.**

6.1 Conclusion

The RHDC project is being implemented with a high standard of environmental management. The project is compliant with the vast majority of its approval and operational requirements and the project has a good standing with regulators and the community. The proponent is resourcing the project well and has highly capable personnel overseeing operations and environmental management.

Continued attention to detail in implementing the Consent and broader environmental requirements will ensure high performance in the future. Implementation of the recommendations and observations from this audit will also assist in continued high levels of compliance and strong audit performance in the future.

6.2 Observations and opportunities for improvement

The below observations are made for the Proponent's consideration.

Table 10: Observations raised during this audit.

Condition of consent	Requirement	Evidence collected (refer to Appendix 7)	zComments/Findings	Compliance status	Observation
MP05_0051 MOD 2					
2.8A	The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 2 at any residence on privately-owned land. Table 2 - refer to consent document.	7.03, 7.04, 3.04, 9.01, 9.02, 9.03, 9.04	No exceedances were identified in dust sentry data for 2023 and 2024. However, HVAS results from 2022 and 2023 exceeded criteria on several occasions. In most cases, other evidence (i.e. meteorological conditions) indicate that the RHDC did not, or was unlikely to have, contributed to the exceedances. The audit team also notes that the criteria apply at residences on privately owned land. The closes residence is several hundred meters away from the Site. No attenuation has been incorporated into the analysis of data that is obtained at the boundary of the Site, so we note that the approach to assessing compliance with this condition is conservative. Noting the discrepancy regarding 'bin enclosure' per Condition 2.8, the design of the Site has not progressed as envisaged in the initial RHDC design. This broader matter of compliance with the general design of the facility has been addressed above in a non-compliance with Condition 2.8. On the weight of evidence, the reasonable and feasible mitigation measures that can be implemented at the Site are being implemented and the audit team is satisfied this condition and its intent is complied with.	Compliant	Continue with best practice dust and air quality management on-site, and look into options to enclose product bin storage areas as conceptualised in the initial RHDC design, or modify the project approval to remove this requirement. Refer to Condition 2.8 for further details.
3.5A	Within a year of the date of the approval of MOD 2, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and commence, and pay the full cost of an Independent Environmental Audit of the development. This audit must: (a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;	3.04, 14.04, 14.05	MOD2 was approved on 29 June 2017. The due date for the first audit was therefore 29 June 2018. An audit was conducted by EMM for the period to 12 December 2017 (published in 2018). MOD2 was approved on 29 June 2017. The previous audit (undertaken for the period 31 March 2016 to 12 December 2017) notes "Given that the majority of the audit period was prior to the approval of MOD2, Condition 3.5 has been	Compliant	The next audit should take place three years after this audit (i.e. on or before 12 December 2027).

Condition of consent	Requirement	Evidence collected (refer to Appendix 7)	zComments/Findings	Compliance status	Observation
	(b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; (e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and (f) be conducted and reported to the satisfaction of the Secretary.		<p>applied. However, it is noted that agencies were consulted as part of this audit." The 2022 EIA found that this condition had not been complied with during that audit period.</p> <p>The due date for the next audit was 12 December 2020. However, the audit was delayed to 17 November 2021 due to Covid-19 restrictions. This was communicated to and agreed to by the Department. The 2022 IEA stated that the next audit was identified as falling due in November 2024. However, the audit team notes verbal advice from DPHI to the Proponent, and standard practice in other similar situations, is to revert to the original audit timing in the event of an interruption that causes an audit that is out of sync.</p> <p>When this is considered, the due date for completing the audit would be 3 years since the previous one, but reverting to the original date. This gives an audit due date of 12 December 2024. This audit was conducted on 12 December 2024, which is compliant with the Condition.</p>		

Recommendations provided over page.

6.3 Recommendations

To address non-compliances, the following recommendations are made.

Table 11: Non-compliances raised during this audit.

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation
MP05_0051 MOD 2					
2.8	<p>The Proponent must design, construct, commission, operate and maintain the project in a manner that minimises dust emissions from the site, as specified in paragraph of the final Statement of Commitments submitted by the Proponent to the Department on 17 March 2006, including:</p> <p>a) all dust control systems for transfer, load out and unloading points, as well as materials handling activities must be designed and operated to comply with a solid particles emission limit of 20 mgm-3 as required by Part 4 of the Protection of the Environment (Clean Air) Regulation 2002;</p> <p>b) all storage bins must be enclosed;</p> <p>c) water spray systems must be installed to service all stockpiles;</p> <p>d) all paved trafficable areas must be swept as required by a permanently stationed street sweeper to minimise dust; and</p> <p>e) the application of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA), where reasonable and practicable, to minimise dust impacts during construction and operation of the project.</p>	3.04, 10.01, 2.01	<p>There continues to be a discrepancy in item (b) the 'enclosure of storage bins'. This is not considered to have a significant environmental impact, as monitoring data is compliant, no dust complaints etc. However, 'bins' as envisaged in the MOD 2 application and other plans were never implemented (we understand there was a design change). This should be addressed, as the Site does not comply with this condition as written. The reference to 'storage bins' has some applicability in the context of the CBP, but is unclear - does it include silos and bays, or both?</p> <p>The 'Indicative Modified RHDC' layout map in Attachment 2 of the consent envisages a pug mill, storage bins in the main yard, conveyors and automated truck loading. The approach that has been taken involves large, open storage bins and manual loading of trucks via FEL. The monitoring data and other lines of evidence (i.e. lack of complaints, observations etc.) suggest the air quality outcomes required at the Site can be achieved based on the current layout; therefore the non-compliance appears to be an administrative one of difference between indicative plans in the Consent and the actual development. This discrepancy should be addressed to minimise regulatory risk for the Proponent.</p>	Non-compliant	<p>The Proponent should consider the most appropriate method to comply with the requirements of this condition. The key options include installation of equipment (i.e. bays/bins, conveyors etc) as envisaged in the Consent, formal communication with the Department regarding the works as executed plan for the Site, or modify the project approval to remove this requirement.</p>
2.21A	<p>The number of on-site car and truck parking spaces to be provided for the project must be in accordance with sections 5.4.3, 5.4.4 and 5.4.6 of the EAR, as follows:</p> <p>a) truck parking: 50 spaces (truck and dog configuration);</p> <p>b) car parking: a total of 310 spaces on the RDC</p>	3.04, 2.01, 10.01	<p>This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> there are approximately 14 delineated truck (and dog) parking spaces currently; 	Non-compliant	<p>The Project Approval should be modified to reflect the number of required parking sites in the absence of a laboratory facility being constructed on site. The number of car spaces required</p>

Condition of consent	Requirement	Evidence collected	Comments/Findings	Compliance status	Recommendation
	<p>and Humes sites, as follows:</p> <p>ii) RDC site: 121 spaces;</p> <p>ii) Regional office and laboratory: 189 spaces, of which 84 are to be allocated to the RDC staff and visitors and 105 are to be allocated to the staff and visitors to the existing Humes development;</p> <p>c) all car parking spaces must be marked/ signposted in accordance with the above allocations. All visitor spaces must be located conveniently in relation to the various administrative offices on the site and must be clearly marked and signposted;</p> <p>d) all car and truck parking spaces must be sealed in a hardstanding material and drained in accordance with the approved stormwater management plan for the project;</p> <p>e) the design and dimensions of all truck and car parking spaces, together with all associated access roads and manoeuvring areas, must be in accordance with AS2890.2(2002);</p> <p>f) a detailed car and truck parking plan, at a scale of 1:200, and incorporating the above requirements, must be submitted for the approval of the Secretary prior to the commencement of any works.</p>		<ul style="list-style-type: none"> • there are approximately 38 delineated car parking spaces provided adjacent the site office/administration (including 2 disabled); • all parking areas sealed and drained to the site stormwater system; • truck and vehicle turning and maneuvering areas appear to be constructed in accordance with the AS2890.2 (2002). <p>Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently.</p> <p>It is understood that Holcim do not propose to develop the Regional office and laboratory site. Therefore the 189 spaces will not be required.</p>		for the RHDC Site should also be revised to reflect actual requirements. This may be done via formal correspondence with the Department or modify the project approval to adjust this requirement. See also Recommendation at Condition 2.8.
3.5B	Within 12 weeks of commencing an audit under condition 3.5A, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.	14.05	<p>The previous audit was conducted on 17 November 2021 and the report was finalised 22 March 2022. The date of the audit report is 4 months and 5 days after the audit was commenced.</p> <p>The previous audit refers to a letter sent to the Department in November 2021 requesting an extension - It has not been established whether that extension request included an extension to the due date for submission, or if another item of correspondence exists.</p>	Non-compliant	Future audit lodgements to be within 12 week period or as otherwise agreed by the Secretary.

7. List of appendices

- Appendix 1. Audit team endorsement.
- Appendix 2. SSD Consent MP05_0051 MOD2 for Rooty Hill Distribution Centre.
- Appendix 3. Not used.
- Appendix 4. Independent Audit Declaration Form.
- Appendix 5. Audit Table.
- Appendix 6. Consultation records, including consolidated consultation comments.
- Appendix 7. Documentary evidence file.

NSW Planning ref: MP05_0051-PA-31

Michael Ensor
Site Manager
HOLCIM (AUSTRALIA) PTY LTD
21 Kellogg Road
Rooty Hill NSW 2766
20/11/2024

Sent via the Major Projects Portal only

Subject: Rooty Hill Regional Distribution Centre - 2024 IEA Auditor Appointment Request

Dear Mr Ensor

I refer to your post approval matter, MP05_0051-PA-31, requesting the Planning Secretary's endorsement of suitably qualified, experienced, and independent persons to conduct the next Independent Environmental Audit (**IEA**) of the Rooty Hill Regional Distribution Centre submitted as required by Condition 3.5A(a) of MP05_0051 as modified (**Consent**), to the NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 30 October 2024.

NSW Planning has reviewed the independent auditor nominations and based on the information you have provided is satisfied that the proposed persons are suitably qualified, experienced, and independent.

Accordingly, as nominee of the Planning Secretary, pursuant to Condition 3.5A(a) of the Consent, I endorse the following independent audit team:

- Annabelle Tungol – Lead Auditor
- Rhys Thompson – Audit Support
- James Hammond – Technical Specialist

Please ensure this correspondence is appended to the IEA report.

The IEA must be prepared, undertaken, and finalised in accordance with the conditions of Consent and the *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements may require revision and resubmission.

Please note that this is an endorsement to the IEA team listed above for this IEA only, and each such request across different IEAs and different projects is assessed on the merits of the proposed team

and the requirements of each project. Endorsement or approval for a team on one project does not necessarily guarantee their suitability for endorsement on another.

NSW Planning nevertheless reserves the right to request an alternate auditor or audit team for future audits, should it be appropriate in the circumstances.

Should you wish to discuss the matter further, please contact Gabriel Abi-Saab, (Senior Compliance Officer) on (02) 9274 6527 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in dark ink, appearing to be "S. Condon".

Samuel Condon
A/Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

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Red type represents the March 2011 Modification

Blue type represents the June 2017 Modification

DEFINITIONS

Act, the	<i>Environmental Planning and Assessment Act, 1979</i>
Annual Review	The review required by condition 6.3
BCA	Building Code of Australia
Conditions of Approval	The Minister's Conditions of Approval for the Project.
Construction	Includes any activity requiring a Construction Certificate, significant excavation work, road works, demolition, or any construction related activity as described in Major Projects Application 05_0051.
Council	Blacktown City Council
EPA	Environment Protection Authority
Department, the	Department of Planning and Environment
Secretary, the	Secretary of the Department (or nominee)
Secretary's Approval	<p>A written approval from the Secretary (or delegate).</p> <p>Where the Secretary Approval is required under a condition the Secretary will endeavour to provide a response within one month of receiving an approval request. The Secretary may ask for additional information if the approval request is considered incomplete. When further information is requested the time taken for the Proponent to respond in writing will be added to the one month period.</p>
EAR	<i>Environmental Assessment Report, Proposed Regional Distribution Centre, Rooty Hill</i> (National Environmental Consulting Services 2005).
Minister, the	Minister for Planning.
DPI Water	Department of Primary Industries - Water
OEH	Office of Environment and Heritage
Operation	Commissioning of any stage of works as described in the Major Projects Application 05_0051.
Project	The project as described in the documentation listed in condition 1.1, the general layout of which is shown in Attachment 3.
Proponent	Rinker Australia Pty Limited (Readymix), or its successors
Publicly Available	Available for inspection by a member of the general public (for example available on an internet site or at a display centre).
RMS	Roads and Maritime Services
Statement of Commitments	The revised Statement of Commitments in Attachment 1 to this Schedule.
Sensitive Receiver	Residence, education institution (e.g. school, TAFE college), health care facility (e.g. nursing home, hospital) and religious facility (e.g. church).
Site	Land to which Project Approval 05_0051 applies
Structure	Residence, farm shed or other building.

1. ADMINISTRATIVE CONDITIONS

Terms of Approval

- 1.1 The Proponent **must** carry out the project generally in accordance with the:
- Project Application 05_0051;
 - Environmental Assessment Report for the Proposed Regional Distribution Centre, Rooty Hill*, volumes 1-3, prepared by National Environmental Consulting Services, dated October 2005;
 - Response to Issues Raised in Submissions to EAR*, prepared by National Environmental Consulting Services, dated February 2006;
 - the final Statement of Commitments, submitted by the Proponent to the Department on 17 March 2006;
 - the Environmental Assessment Report - Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW* prepared by Umwelt (Australia) Pty Limited, dated October 2010; including the *Response to Submissions for Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW*, dated 9 December 2010, and the March 2011 Modification Statement of Commitments shown in Attachment 2;
 - the Environmental Assessment Report – Rooty Hill Regional Distribution Centre Minor Modification*, prepared by Umwelt (Australia) Pty Limited and dated February 2017; including the *Response to Submissions for Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW*, dated 16 May 2017; and
 - the conditions of this approval.

Note: The general layout of the project is shown in Attachment 3.

- 1.2 If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.
- 1.3 The Proponent **must** comply with any reasonable requirement/s of the **Secretary** arising from the Department's assessment of:
- any reports, plans or correspondence that are submitted by the Proponent in accordance with this approval; and
 - the implementation of any actions or measures contained in those reports, plans or correspondence submitted by the Proponent.

Limits of Approval

- 1.4 The Proponent **must** not distribute more than four million tonnes of construction materials (excluding concrete) a year from the site.
- 1.5 The production capacity of the concrete batching plant **must** not exceed 200,000 cubic metres per year.
- 1.6 Apart from the delivery of materials for use in the concrete batching plant, and special products, the Proponent **must** only receive construction materials, being aggregates and sand, at the site by rail, unless otherwise approved by the **Secretary** on a case-by-case basis. The **Secretary's** approval to receive materials at the site other than by rail **must** only be granted with adequate demonstration by the Proponent that exceptional circumstances exist.
- 1.7 This approval shall lapse five years after the date on which it is granted, unless the works the subject of this approval are physically commenced on or before that time.

Management Plans/Monitoring Programs

- 1.8 With the approval of the **Secretary**, the Proponent may prepare and submit any management plan or monitoring program required by this approval on a progressive basis. Where a management plan or monitoring program is required before carrying out the project, or any

stage of [the](#) project, the plans/programs may be prepared and submitted in relation to either discrete components of the project or for a specified time period.

Utilities and Services

- 1.9 Prior to the commencement of construction, the Proponent [must](#) identify (including, but not limited to the position and level of service) all public utility services on the site, roadway, footpath, public reserve or any public areas that are associated with, and/or adjacent to the site, and/or likely to be affected by the construction and operation of the project.
- 1.10 The Proponent [must](#) consult with the relevant utility provider(s) for those services identified under condition 1.9 and make reasonable arrangements to adjust and/or relocate services as may be required as a result of undertaking the project. The Proponent [must](#) bear the full cost associated with providing utilities and services to the site, and restoring any public infrastructure that may be damaged as a result of the project.
- 1.11 Prior to the commencement of construction works that may affect services/utilities, the Proponent [must](#) provide documentary evidence to the [Secretary](#) that the reasonable requirements of the relevant utility provider(s) have been met.
- 1.12 Prior to the commencement of construction of the project, the Proponent [must](#) undertake a Final Hazard Analysis based on the detailed design of the project and with a particular focus on risks associated with the Sydney to Newcastle Natural Gas Pipeline. The Final Hazard Analysis [must](#) be undertaken in accordance with *Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis* (DUAP, 1997) and AS2885 Pipelines - Gas and Liquid Petroleum – Operation and Maintenance. The Final Hazard Analysis [must](#) be submitted for the approval of the [Secretary](#) prior to the commencement of construction works.
- 1.12A Prior to the issue of a construction certificate, the Proponent is to pay \$177,644.00 to Blacktown City Council for infrastructure enhancement within Blacktown local government area.

Structural Adequacy

- 1.13 The Proponent [must](#) ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.

Notes:

Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works.

Part 8 of the EP&A Regulation sets out the requirements for the certification of the Project.

2. SPECIFIC ENVIRONMENTAL CONDITIONS

Noise

- 2.1 The Proponent [must](#) minimise noise emissions from plant and equipment operated on the site in relation to the project by installing and maintaining, wherever reasonable and practicable, efficient silencers, low-noise mufflers (residential standard) and replacement of reversing alarms with alternative measures, such as flashing lights.
- 2.1A In order to minimise sleep disturbance, the Proponent [must](#) operate all shunting to and from the project by groups of rigidly-connected wagons (rakes) or other appropriate technology approved by the [Secretary](#).

Construction

- 2.2 The Proponent [must](#) only undertake construction activities associated with the project, that are audible at any residential receptor, between the following hours:

- a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive;
- b) 8:00 am to 1:00 pm on Saturdays; and
- c) at no time on Sundays or public holidays.

Operation

- 2.3 The Proponent **must** design, construct, operate and maintain the project to ensure that the noise contributions from the project to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 1, at those locations and during those periods indicated.

Table 1: Noise Criteria

Location	Morning Shoulder (6am – 7am Monday to Saturday and 6am – 8am Sundays and Public Holidays)	Day 7am – 6pm Monday to Saturday and 8am – 6pm Sundays and Public Holidays	Evening 6pm – 10pm Monday to Sunday	Night 10pm – 7am Monday to Saturday and 10pm – 8am Sunday	
	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{Aeq} (15 minute) (dB(A))	L _{A1} (1 minute) (dB(A))
Any residences in Station Street	39	44	44	39	53
Any Residences in Crawford Road	40	40	39	39	53
Any residences in Mavis Street	35	35	35	35	53
Nurragingy Reserve	When the Reserve is in use – L _{Aeq} 50 dB(A)				
Colebee Centre	When the Centre is in use – L _{Aeq} 50 dB(A)				
Blacktown Olympic Park (active recreation areas)	When active recreational areas of the Park are in use – L _{Aeq} 55 dB(A)				

- 2.4 For the purpose of assessment of noise contributions specified under condition 2.3 of this approval, noise from the project **must** be
- a) measured at the most affected point on or within the residential boundary, or at the most affected point within 30 metres of the dwelling (where the dwelling is more than 30 metres from the boundary) to determine compliance with L_{Aeq}(15 minute) noise limits; or
 - b) measured at 1 metre from the dwelling façade to determine compliance with L_{A1}(1 minute) noise limits.
- 2.5 Notwithstanding condition 2.4 of this approval, should direct measurement of noise from the project be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA's *Industrial Noise Policy*). Details of such an alternative noise assessment method accepted by the EPA **must** be submitted to the Secretary prior to the implementation of the assessment method. Section 4 of the *Industrial Noise Policy* **must** also apply to the measured noise levels, where applicable.
- 2.6 Noise emission limits specified under condition 2.3 apply under the following meteorological conditions:
- a) wind speed up to 2ms⁻¹ at 10 metres above ground level; or
 - b) temperature inversion conditions of up to 3°C/100m and wind speed up to 2ms⁻¹ at 10 metres above the ground.

Operational Noise Management Protocol

2.7 Prior to the commencement of operations at the site, the Proponent **must** prepare and implement an **Operational Noise Management Protocol** for the project. The Protocol **must** include, but not necessarily be limited to:

- a) a principal requirement to satisfy the limits specified in condition 2.3 of this approval at all times, including to the extent that is reasonable and practical, acoustic considerations in the detailed design of the project;
- b) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise noise impacts over the life of the proposal;
- c) a system of regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the noise limits specified in condition 2.3 of this approval. Acoustic auditing **must** be conducted by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project.

The Protocol **must** be incorporated into the Operational Environmental Management Plan, required under condition 5.4 and condition 5.5 of this approval. The results of any assessment and auditing under the Protocol **must** be reported in the **Annual Review** (refer to condition 6.3 of this approval).

A copy of the Protocol **must** be submitted to **EPA** and the **Secretary** prior to the commencement of operations at the site.

Air Quality

2.8 The Proponent **must** design, construct, commission, operate and maintain the project in a manner that minimises dust emissions from the site, as specified in paragraph of the final Statement of Commitments submitted by the Proponent to the Department on 17 March 2006, including:

- a) all dust control systems for transfer, load out and unloading points, as well as materials handling activities **must** be designed and operated to comply with a solid particles emission limit of 20 mgm⁻³ as required by Part 4 of the *Protection of the Environment (Clean Air) Regulation 2002*;
- b) all storage bins **must** be enclosed;
- c) water spray systems **must** be installed to service all stockpiles;
- d) all paved trafficable areas **must** be swept as required by a permanently stationed street sweeper to minimise dust; and
- e) the application of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA), where reasonable and practicable, to minimise dust impacts during construction and operation of the project.

2.8A The Proponent **must** ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 2 at any residence on privately-owned land.

Table 2: Air quality criteria

Pollutant	Averaging Period	Criterion
Particulate matter < 10 µm (PM ₁₀)	Annual	^{a,d} 25 µg/m ³
Particulate matter < 10 µm (PM ₁₀)	24 hour	^{b,d} 50 µg/m ³
Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a,d} 8 µg/m ³
Particulate matter < 2.5 µm (PM _{2.5})	24 hour	^{b,d} 25 µg/m ³
Total suspended particulates (TSP)	Annual	^{a,d} 90 µg/m ³

Note:

"Reasonable and feasible avoidance measures" includes, but is not limited to, the operational requirements in conditions 2.8, 3.1(b) and 5.3(d) to develop and implement an air quality management system that ensures operational responses to the risks of exceedance of the criteria.

Notes to Table 3:

a Cumulative impact (ie increase in concentrations due to the development plus background concentrations due to all other sources).

b Incremental impact (ie increase in concentrations due to the development alone, with zero allowable exceedances of the criteria over the life of the development).

c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.

d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.

- 2.9 All trafficable areas and vehicle manoeuvring areas on the site **must** be maintained in a condition that will minimise the generation or emission of wind blown or traffic generated dust from the site at all times.
- 2.10 Heavy vehicles entering and leaving the site that are carrying loads **must** be covered at all times, except during loading and unloading activities.

Traffic and Transport

Internal Roads and Parking

- 2.11 The Proponent **must** take reasonable measures to ensure that heavy vehicles accessing the site **must** not queue within the adjacent local road network.
- 2.12 The Proponent **must** take reasonable measures to ensure that vehicles used for the construction and/or operation of the project **must** not park on local roads in the vicinity of the project at any time.
- 2.13 The Proponent **must** design and construct all internal roads, including associated loading bays, car parking facilities, driveways, ramp grades, turn paths, sight distances and aisle widths, in accordance with relevant **RMS** and Council codes, including AS 2890.1 – 2004 and AS 2890.2 – 2002.
- 2.14 The Proponent **must** clearly mark all visitor, disabled, ambulance and service vehicle parking areas.

Train Operations

- 2.15 The Proponent **must** seek approval from Rail Corporation New South Wales for the allocation of freight train paths into and out of the site from the Main Western Line.

Access

- 2.16 The Proponent **must** negotiate with the owner of the OneSteel site to use that land for access to the southern sections of the project site for the construction of the Angus Creek road bridge. Should the Proponent and the owner of the OneSteel site be unable, after reasonable attempts, to negotiate for access through that site, the Proponent may seek the **Secretary's** agreement to access the project site via the Knox Road/Nurraringy Reserve access point. In seeking the **Secretary's** agreement, the Proponent must demonstrate to the **Secretary's** satisfaction that it has applied all reasonable endeavours to negotiate an outcome that avoids the use of the Knox Road/Nurraringy Reserve access point.

Note: The environmental impacts associated with the use of both access points have been assessed and are considered to be acceptable in both cases. However, the use of the OneSteel site for construction access is considered to pose reduced residual environmental impacts, and is therefore the preferred outcome. If the Knox Road/ Nurraringy Reserve access is utilised, residual environmental and public safety impacts must be comprehensively managed, as required under the conditions of this consent.

- 2.17 In the event that the **Secretary** agrees under condition 2.16 to site access for the construction of the project via the Knox Road/ Nurragingy Reserve access point, the Proponent **must** limit vehicles using that access point to 40 vehicle movements per day (20 round trips per day) until the completion of the Angus Creek road bridge. Once the road bridge has been constructed, access to the site during construction **must** be restricted to via Kellogg Road.
- 2.18 In the event that the **Secretary** agrees under condition 2.16 to site access for the construction of the project via the Knox Road/ Nurragingy Reserve access point, the Proponent **must** develop, in consultation with Council, a **Construction Access Management Program** to comprehensively mitigate and manage impacts associated with construction access via Knox Road/ Nurragingy Reserve. The Program **must** include, but necessarily be limited to:
- a) scheduling of vehicle movements to avoid peak public usage times within the Reserve;
 - b) vehicle access, speed, route and manoeuvring requirements to apply to traffic passing through the Reserve to ensure public safety, minimisation of dust generation, minimisation of traffic noise impacts and the protection of flora and fauna;
 - c) arrangements for surveys of existing road infrastructure standards within Knox Road/ Nurragingy Reserve before and after use of the infrastructure for site access;
 - d) arrangements for funding and implementation of ameliorative works should surveys of road infrastructure indicate a deterioration in the standard of the infrastructure as a result of construction vehicle access;
 - e) consideration of pavement strengthening/ repairs of the access route and the structural stability of the causeway over Eastern Creek, prior to use;
 - f) consideration of widening and/ or appropriate traffic management to ensure safe passing opportunities; and
 - g) the cost of the works required as part of the Program to be borne by the Proponent.

The Proponent **must** submit the Program to the **Secretary** for approval prior to the use of the Knox Road/ Nurragingy Reserve access point.

- 2.19 Access to the site during operation of the project **must** be via Kellogg Road and Woodstock Avenue. Access to the site via North Parade **must** be for maintenance purposes or emergency access only.

Road Improvements

- 2.20 Prior to the commencement of operation of the project, the Proponent **must** upgrade the intersection of Kellogg Road and Woodstock Avenue by constructing a one-lane roundabout capable of accommodating B-double vehicles, or by installing traffic signals, in accordance with the relevant standards. The Proponent **must** carry-out and pay 100% of the cost of the design and construction works for the roundabout (or traffic signalisation) and, if any, the full cost of any land acquisition necessary in order to carry out the works.
- 2.20A Subject to condition 2.20, prior to the commencement of construction of the project, the Proponent **must** develop, in consultation with Council and **RMS**, a schedule for the implementation of road upgrades necessary for the implementation of the project, as specified under this approval and the EAR and as amended by the conditions of this approval. The schedule **must** include, but not necessarily be limited to:
- a) timing and coordination of the road works recommended in section 7.10 of the EAR for the project, having regard to the timing for implementation of the project coordination of all road works to minimise conflict with other road users;
 - b) provision for the finalisation of detailed design of road works, in consultation with Council and the **RMS**, and in accordance with relevant design guides and criteria specified by those parties;

- c) design of operational access routes to the site to cater for B-Double vehicles where appropriate and in accordance with *RTA Road Design Guide* and the *AUSTROADS Pavement Design Guide*;
- d) arrangements for the funding of road works by or on behalf of the Proponent, **fully reflecting the percentage of heavy** road traffic contributed by the project to site access routes; and
- e) with respect to Kellogg Road:
 - i) an independent assessment of the condition of the pavement and the pavement life for the travel lanes in Kellogg Road **must** be undertaken by a road pavement specialist;
 - ii) the required pavement works and cost to upgrade the road pavement for the current traffic volumes using travel lanes in Kellogg Road over the design life (typically 20 years) **must** be determined;
 - iii) the required pavement works and cost to upgrade the road pavement for the current traffic volumes plus traffic generated by the project using travel lanes over the design life (typically 20 years or the same design life adopted for (ii)) **must** be determined; and
 - iv) the Proponent **must** pay the difference in costs for the works required under ii) and iii) above;
- f) provision for the appointment of an independent civil or traffic engineer to certify the adequacy of road works design (consistent with this condition) and the adequacy of the works once constructed.

In the event of any dispute with respect to the scope or content of the schedule for implementation of road upgrades, relocations and replacements, or the detailed design of the road works, the dispute **must** be referred to the **Secretary**, whose determination of the dispute **must** be final and binding on all parties.

Transport Noise Management Strategy

- 2.21 Prior to the commencement of operations, the Proponent **must** prepare, a **Traffic Noise Management Strategy** for the project for the project. The Strategy **must** be designed to ensure best practice noise management strategies for vehicle movements associated with the project to minimise noise generated by heavy vehicles movements. The Strategy **must** include, but not necessarily be limited to, the following:
- a) measures to ensure that the commitments for minimising/managing traffic noise as identified in the EAR and supporting information submitted to the Department for the project are effectively implemented. This **must** include the incorporation of these requirements in contractual agreements made by the Proponent;
 - b) a program of driver training to ensure that drivers are aware of route restrictions applicable to the project and to ensure that noisy vehicle practices are not undertaken during approach or departure from the site, including the restriction/prohibition on the use of compression engine brakes;
 - c) a scheme of fleet selection and maintenance that reflects best noise practice/technology as far as practicable;
 - d) measures to ensure the flexible scheduling of movements to reduce impacts on residential areas during sensitive times of the day and night;
 - e) communication and management strategies for heavy vehicles associated with the project (including those not owned by the Proponent) to ensure the requirements of the Strategy are met;
 - f) a community consultation program, including a complaints line for the community to report movements that do not abide by the Strategy (refer to condition 4.2 and condition 4.4 of this approval);
 - g) the incorporation of an audit and monitoring program for the Strategy to determine compliance with the Strategy by heavy vehicles associated with the project and to evaluate the effectiveness of strategy in minimising traffic noise (refer to condition 3.1c) of this approval).

The Proponent **must** not commence operations until the **Secretary** has approved the Traffic Noise Management Strategy. The Strategy **must** be incorporated into the Operational Environmental Management Plan for the project (refer to condition 5.4 and condition 5.5 of this approval). **The Proponent must implement the management strategy as approved from time to time by the Secretary.**

- 2.21A The number of on-site car and truck parking spaces to be provided for the project **must** be in accordance with sections 5.4.3, 5.4.4 and 5.4.6 of the EAR, as follows:
- a) truck parking: 50 spaces (truck and dog configuration);
 - b) car parking: a total of 310 spaces on the RDC and Humes sites, as follows:
 - ii) RDC site: 121 spaces;
 - ii) Regional office and laboratory: 189 spaces, of which 84 are to be allocated to the RDC staff and visitors and 105 are to be allocated to the staff and visitors to the existing Humes development;
 - c) all car parking spaces **must** be marked/ signposted in accordance with the above allocations. All visitor spaces **must** be located conveniently in relation to the various administrative offices on the site and **must** be clearly marked and signposted;
 - d) all car and truck parking spaces **must** be sealed in a hardstanding material and drained in accordance with the approved stormwater management plan for the project;
 - e) the design and dimensions of all truck and car parking spaces, together with all associated access roads and manoeuvring areas, **must** be in accordance with AS2890.2(2002);
 - f) a detailed car and truck parking plan, at a scale of 1:200, and incorporating the above requirements, **must** be submitted for the approval of the **Secretary** prior to the commencement of any works.

Flora and Fauna

- 2.22 The Proponent **must** minimise any clearing of vegetation in carrying out of the project, consistent with a Vegetation Management Plan developed to the satisfaction of the **DPI Water** and **OEH** under condition 2.24 of this approval.
- 2.23 Prior to the commencement of any earthworks or vegetation clearing at the site, vegetation to be protected is to be fenced off with clearly visible, durable, and appropriately signposted exclusion fencing in accordance with any specific requirements identified in the Vegetation Management Plan prepared under condition 2.24.
- 2.24 Prior to the commencement of any construction activities, the Proponent **must** prepare to the satisfaction of the **DPI Water** and **OEH**, a **Vegetation Management Plan** in accordance with the **DPI Water** guidelines *How to Prepare a Vegetation Management Plan – Version 4* and *Watercourse and Riparian Zone Rehabilitation Requirements* as well as **OEH** *Recovering Bushland on the Cumberland Plain*. The Plan **must** include drawings that clearly show vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring. Site rehabilitation and maintenance is to be carried out in accordance with the Plan, and the **DPI Water** is to be advised of the person responsible for any seed or vegetative propagation prior to the commencement of that propagation. **The Proponent must implement the management plan as approved from time to time by the Secretary.**
- 2.25 All rehabilitated and revegetated areas of the site **must** be maintained and monitored for a period of at least five years after final planting, or where other revegetation methods are used, five years from when plants are of tube stock size and are at the densities specified in the Vegetation Management Plan. Maintenance **must** include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, protection from any mowing or slashing on adjacent land, mulching and any other requirements necessary for achieving successful vegetation establishment.

- 2.26 Immediately after completion of initial planting/seeding and every year thereafter for the duration of the maintenance period the Proponent **must** submit to the Department a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.

Compensatory Habitat Package

- 2.27 Prior to the commencement of any part of the construction works that will result in the removal of the endangered ecological communities of the Cumberland Plain Woodland a compensatory habitat package **must** be established in consultation with the **OEH**. The package **must** include one or more of the following compensatory measures:
- a) provision of no less than 3 hectares of compensatory habitat comprising of Cumberland Plain Woodland, whether new or restored, for every 1 hectare of “Core Habitat” or “Support to Core” habitat impacted; or
 - b) equivalent financial contribution to a rehabilitation project in the Blacktown local government area; or
 - c) any other form of compensatory habitat agreed by the **OEH**.

In the event of any dispute with respect to the scope or content of the compensatory habitat package, the dispute **must** be referred to the **Secretary**, whose determination of the dispute **must** be final and binding on all parties.

- 2.28 Nothing in this approval precludes the inclusion of on-site rehabilitation works referred to under conditions 2.24 to 2.26 , in consultation with the **OEH**, from inclusion as part of the compensatory habitat package required under condition 2.27.

Aquatic Ecology

- 2.28A The Proponent **must** monitor aquatic ecology in Angus and Eastern Creeks as outlined in the Statement of Commitments, and **must** expand this monitoring program to:
- a) ensure that baseline data is collected, including commencement of sampling not less than six months before commencement of construction and the use of control sites;
 - b) include monitoring of water quality and aquatic ecology at four locations within Nurraging Reserve;
 - c) not include the site sampled on Eastern Creek (“E01” – in Technical Report 4 of the EAR) as a monitoring site, but use at least two other locations; and
 - d) make provision for monitoring in relation to wet and dry periods.

Surface Water

- 2.29 Except as may be expressly provided by an Environment Protection Licence for the project, the Proponent **must** comply with section 120 of the *Protection of the Environment Operations Act 1997*, which prohibits the pollution of waters.
- 2.30 The Proponent **must** ensure that all proposed works within, or connected to Angus Creek are designed, constructed, operated and maintained in compliance with the **DPI Water’s Draft Guidelines – Watercourse Crossing Design & Construction** and NSW Fisheries’ *Why do Fish Need to Cross the Road? – Fish Passage Requirements for Waterway Crossings (2004)* and *Policy and Guidelines for Fish Friendly Waterway Crossings (2004)*.
- 2.31 The Proponent **must** generally design, construct and maintain all stormwater management infrastructure on the site having regard to:
- a) restriction of future stormwater flows from the site to existing flow levels or better and utilising Council’s *On-Site Stormwater Detention Policy dated February 2005*, as a guide;

- b) management of all stormwater to minimise the discharge of sediments and other pollutants from the site. This **must** include the use of gross pollutant traps to screen captured stormwater prior to discharge;
- c) Landcom's *Managing Urban Stormwater: Soils and Conservation*, 4TH edition March 2004 and *Managing Urban Stormwater Soils and Construction: Volume 2D Main Road Construction*;
- d) compliance with the relevant provisions in the New South Wales Government's *Best Practice Guidelines for Contaminated Water Retention and Treatment Systems 1994*;
- e) prevention of the drainage of stormwater onto neighbouring properties and adjoining roadways;
- f) prevention of overloading Council's stormwater infrastructure by site discharges during heavy rainfall events;
- g) Council's *Stormwater Quality Control Policy dated 1 June 2005*;
- h) from the date of approval of MOD 2, Part J of the Blacktown Development Control Plan (2015), titled *Water Sensitive Urban Design and Integrated Water Cycle Management* (in place of the document listed in paragraph g) above); and
- i) current water-sensitive design best-practice guidelines, such as *Sensitive Urban Design Technical Guidelines for Western Sydney* (Upper Parramatta River Catchment Trust) dated May 2004.

Prior to the commencement of construction of the project, the Proponent **must** submit to the **Secretary**, certification from a qualified, independent civil engineer that the stormwater management systems for the site have been designed generally in accordance with the above requirements, or equivalent outcomes as may be endorsed by the independent civil engineer and agreed by the **Secretary**.

2.32 The Proponent **must** obtain Rail Corporation New South Wales endorsement for any on site drainage works to ensure that the project does not result in the flooding of the Main West Railway Line.

2.32A All stormwater management measures located within the 1% AEP extent of inundation **must** be designed and constructed to have minimal impact on the 1% AEP flood regime.

Visual Amenity Impacts

2.33 The Proponent **must** ensure that all external lighting associated with the project is mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadway. The lighting **must** be the minimum level of illumination necessary and **must** comply with AS 4282(INT) 1997 – *Control of Obtrusive Effects of Outdoor Lighting*.

2.34 Prior to the commencement of site preparation activities associated with the project, the Proponent **must** submit for the approval of the **Secretary**, a detailed Landscape Plan for the whole of the project (including the proposed administrative building) prepared by a qualified landscape architect, and consistent with the Landscape Master Plan detailed in the EAR, as amended by any requirement specified elsewhere in this approval. The Plan **must** include (provided it is consistent with and not in derogation of the Vegetation Management Plan in condition 2.24) the following:

- a) species that are predominantly endemic to the locality (that is from the River-Flat Eucalypt Forest and Cumberland Plain Woodland communities) and including details of, but not limited to, the number and type of species, the pot sizes, details of mulching, and staking;
- b) planting to visually screen the project as far as practicable when viewed from nearby residential properties and public areas. Particular attention **must** be given to screening the project, where practicable, from lines of sight towards the Nurragingy Reserve and Blacktown Olympic Park; and
- c) the setback to the road frontages (of at least 7.1 metres) **must** be comprehensively landscaped.

The Proponent **must** maintain the abovementioned landscaping works in a healthy and tidy state throughout the life of the project.

- 2.35 This approval does not permit the display of any advertisement, or the erection of any advertising structure, on the site. This condition does not apply for any advertisement or structure that cannot be seen from the nearest public space, or any signage specified elsewhere in this approval.

Waste

- 2.36 The Proponent **must** not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated by the project to be disposed of at the site, except as expressly permitted by a licence under the *Protection of the Environment Operations Act 1997*.

Note: The above condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the *Protection of the Environment Operations Act 1997*.

Heritage

- 2.37 Should any Aboriginal relics be uncovered during any of the construction activities, all construction work in the vicinity of the relic **must** cease and the Proponent **must** contact **OEH** and the Local Aboriginal Land Council as soon as practicable. The Proponent **must** meet the requirements of the **OEH** with respect to the treatment, management and/or preservation of any such relic.

Dangerous Goods

- 2.38 All chemicals, fuels and oils **must** be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) **must** be designed and installed in accordance the requirements of the **EPA's** Environmental Protection Manual *Technical Bulletin Bunding and Spill Management*.

Fire Safety

- 2.39 The Proponent **must** ensure that all operations and activities occurring at the site are carried out in a manner that prevents and/or minimises the risk of fire.
- 2.40 The Proponent **must** provide appropriate fire-fighting equipment at the site, and **must** ensure appropriate volumes of emergency supplies of water (for fire fighting purposes), is provided at the site at all times during operations to ensure an appropriate response to any fire event.

3. ENVIRONMENTAL MONITORING AND AUDITING

Operational Monitoring Plan

- 3.1 Prior to the commencement of operation of the project, the Proponent **must** prepare an **Operational Monitoring Plan** for activities associated with the project. The Monitoring Plan **must** include, but not be necessarily be limited to, the following components:
- a) a **Noise Monitoring Program**. The program **must** monitor noise levels during operational activities. The Monitoring Plan **must** include, but not be necessarily be limited to, the following components:
 - i) identification of noise monitoring locations;
 - ii) scheduling of noise monitoring, with reference to day, evening and night-time periods;
 - iii) provisions and procedures for determining $L_{Aeq}(15 \text{ minute})$, $L_{A90}(15 \text{ minute})$ and $L_{A1}(1 \text{ minute})$ noise levels;
 - iv) review and assessment mechanisms to establish and address noise impacts on residential receptors;
 - v) such monitoring **must** be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of

- this approval), or involved in any supervision or designs associated with the construction of the project.
- b) an **Ambient Dust Monitoring Program**. The program **must** provide for continuous monitoring of ambient dust concentrations (PM₁₀) at no fewer than two locations at and around the site, as approved by the **Secretary**. The monitoring **must** employ the sampling and analysis methods specified under AM-18 or AS3580.9.8 and results of this monitoring **must** be recorded in µgm⁻³ **to demonstrate compliance with condition 2.8A**.
 - c) a **Transport Monitoring Program** to monitor traffic movements and driver behaviour of heavy vehicles associated with the project. This program **must** be applied to all heavy vehicles associated with the project. The Program **must** include, but not necessarily be limited to:
 - i) details on the monitoring program, such as the frequency and methodology of the monitoring program. This program **must** include (but not be limited to) the 'spot' auditing of transport movements and driver behaviours at various operational times;
 - ii) a regular internal review of results from the monitoring program to assess the performance of the transport management measures and to ensure compliance with the requirements of this approval; and
 - iii) a protocol for implementing contingency measures should any non-compliance be detected.

The Operational Monitoring Program **must** be incorporated into the Operational Environmental Management Plan for the project (refer to condition 5.4 of this approval). **The Proponent must implement the management plan as approved from time to time by the Secretary.**

Note: The results of the monitoring program required in condition 3.1 of this approval may be incorporated into the **Annual Review**, required by condition 6.3 of this approval.

- 3.2 The Proponent **must** review the Operational Monitoring Program referred to under condition 3.1 on a six-monthly basis, and may, with the agreement of the **Secretary**, alter the frequency and/ or scope of monitoring provided:
- a) pollutant/ parameter monitoring has been undertaken for a period of no less than six months (measured from the commencement of operation of the project);
 - b) there has been no exceedence of any limit placed on the subject pollutant or parameter, through this consent or any Environment Protection Licence under the *Protection of the Environment Operations Act 1997* within the preceding six-month period;
 - c) there has been no reasonable complaint received from the public in relation to the subject pollutant/ parameter within the preceding six-month period (refer to condition 4.3 of this approval); and
 - d) the **EPA** raises no objection to the proposed alteration to the frequency of pollutant/ parameter monitoring.

Noise Audit

- 3.3 Within 90 days of commencement of operations associated with the project and during a period in which the project is operating under normal operating conditions, the Proponent **must** conduct a **Noise Audit** of its operations. This Audit **must**:
- a) be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project;
 - b) assess whether the project is complying with the criteria specified in condition 2.3 of this approval;
 - c) identify what additional measures could be implemented to ensure compliance should any non-compliance be detected; and

- d) provide details of any complaints received relating to noise generated by the project, and action taken to respond to those complaints.
- 3.4 Within 28 days of conducting the Audit referred to under condition 3.3 of this approval, the Proponent **must** provide the **Secretary** and the **EPA** with a copy of the Noise Audit report. If the Noise Audit identifies any non-compliance with the noise limits imposed under this approval, the Proponent **must** detail within 30 days what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the **Secretary**. These ameliorative measures **must** be completed, if practicable, within 30 days of submission of the Noise Audit to the **Secretary** and a second noise audit **must** be conducted demonstrating acoustic compliance. If it is not practicable to complete the ameliorative measures within the 30 day period they should be undertaken in accordance with a timetable approved by the **Secretary** and the **EPA**.

Independent Environmental Auditing

- 3.5 The Proponent shall commission an independent person or team to undertake an Environmental Audit of the project at six months, and at two years after the commencement of operation of the project, and then as may be directed by the Director-General. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. The Audit shall:
- a) be carried out in accordance with *ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing*;
 - b) assess compliance with the requirements of this approval, and other licences and approvals that apply to the project;
 - c) assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this approval; and
 - d) review the effectiveness of the environmental management of the project, including any environmental impact mitigation works.

An **Environmental Audit Report** shall be submitted to the Director-General within two months of the completion of the Audit, detailing the findings and recommendations of the Audit and including a detailed response from the Proponent to any of the recommendations contained in the Report.

The Director-General may require the Proponent to undertake reasonable works to address the findings or recommendations presented in the Report in relation to compliance with this approval. Any such works shall be completed within such time as the Director-General may require.

Note: This condition only requires audits to be undertaken and reported for the period prior to the approval of MOD 2.

- 3.5A Within a year of the date of the approval of MOD 2, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and commence, and pay the full cost of an Independent Environmental Audit of the development. This audit must:
- (a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;
 - (b) include consultation with the relevant agencies;
 - (c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);
 - (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals;

- (e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and
- (f) be conducted and reported to the satisfaction of the Secretary.

3.5B Within 12 weeks of commencing an audit under condition 3.5A, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.

4. COMMUNITY INFORMATION, CONSULTATION AND INVOLVEMENT

4.1 By 30 September 2011, the Proponent must:

- (a) make copies of the following publicly available on its website:
 - the documents referred to in condition 1.1;
 - all relevant statutory approvals for the project;
 - all approved strategies, plans and programs required under the conditions of this approval;
 - a comprehensive summary of the monitoring results for the project;
 - a complaints register, which is to be updated on a quarterly basis;
 - the Annual Review reports required under this approval (over the last 5 years);
 - any independent environmental audit of the project, and the Proponent's response to any recommendations in any audit; and
 - any other matter required by the Secretary; and
- (b) keep this information up-to-date, to the satisfaction of the Secretary.

Complaints Procedure

4.2 Prior to the commencement of construction of the project, the Proponent must ensure that the following are available for community complainants for the life of the project (including construction and operation):

- a) a telephone number on which complaints about construction and operational activities at the site may be registered;
- b) a postal address to which written complaints may be sent; and
- c) an email address to which electronic complaints may be transmitted.

The telephone number, the postal address and the email address must be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.

4.3 The Proponent must record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register must record, but not necessarily be limited to:

- a) the date and time, where relevant, of the complaint;
- b) the means by which the complaint was made (telephone, mail or email);
- c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;
- d) the nature of the complaint;
- e) any action(s) taken by the Proponent in relation to the complaint, including any follow-up contact with the complainant; and
- f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.

The Complaints Register must be made available for inspection by the Secretary upon request.

Community Communication Strategy

4.4 Prior to the commencement of any works associated with the project at the site, the Proponent **must** prepare a **Community Communication Strategy** for the project. This strategy **must** be designed to enable the Proponent to respond to any enquiries from the local community and/or adjoining landowners and to provide mechanisms to inform the local community and adjoining landowners as to the operational environmental performance of the facility. The Strategy **must** include, but does not necessarily be limited to:

- a) mechanisms through which the Proponent can report to the local community and adjoining landowners on the operations of the project and its environmental performance;
- b) mechanisms through which the community and/or adjoining landowners can provide feedback to the Proponent in relation to the environmental management of the project; and
- c) mechanisms through which the Proponent can respond to any enquires or feedback from the community and/or adjoining landowners in relation to the environmental performance of operations at the project.

The Strategy **must** be approved by the **Secretary** prior to the commencement of construction of the project. **The Proponent must implement the management strategy as approved from time to time by the Secretary.**

5. ENVIRONMENTAL MANAGEMENT

Environmental Representative

5.1 Prior to the commencement of site preparation works, the Proponent **must** nominate a suitably qualified and experienced Environmental Representative(s) whose appointment is to receive prior approval of the **Secretary**. The Proponent **must** employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the **Secretary**, during the operations at the site. The Environmental Representative **must** be:

- a) the primary contact point in relation to the environmental performance of the project;
- b) responsible for all Management Plans and Monitoring Programs required under this approval;
- c) responsible for considering and advising on matters specified in the conditions of this approval, and all other licences and approvals related to the environmental performance and impacts of the project;
- d) responsible for receiving and responding to complaints in accordance with condition 4.2 of this approval; and
- e) given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur.

The Proponent **must** notify the **Secretary** of any changes to that appointment that may occur from time to time.

Construction Environmental Management Plan

5.2 The Proponent **must** prepare a **Construction Environmental Management Plan** to outline environmental management practices and procedures to be followed during the site preparation and construction activities during each stage of the project. The Plan **must** be consistent with the Department's *Guideline for the Preparation of Environmental Management Plans* (DIPNR 2004) and **must** include, but not necessarily be limited to:

- a) the Management Plans listed under condition 5.3 of this approval;
- b) the environmental management and mitigation measures outlined in **the documents referenced in condition 1.1**; and
- c) complaints handling procedures during construction.

The Plan **must** be approved by the **Secretary** prior to the commencement of any site preparation and construction works associated with the project subject to this approval, or within such period otherwise agreed by the **Secretary**. Construction works associated with

any stage of the project subject to this approval **must** not commence until written approval has been received from the **Secretary** for that stage. **The Proponent must implement the management plan as approved from time to time by the Secretary.**

- 5.3 As part of the Construction Environmental Management Plan for the project, required under condition 5.2 of this approval, the Proponent **must** prepare, the following Management Plans:
- a) a **Soil and Water Management Plan** to detail measures to minimise dust, erosion and the discharge of sediment and other pollutants to lands and/or waters during construction works associated with the project. The Plan **must** be prepared in accordance with Landcom's *Managing Urban Stormwater: Soils and Construction*.
 - b) a **Noise Management Plan** to detail measures to minimise noise generated during construction activities associated with the project. The Plan **must** include, but not necessarily be limited to:
 - i) identification of each work area, site compound and access route (both private and public), and the identification of the specific activities that will be carried out and associated noise sources at these sites;
 - ii) identification of all potentially affected sensitive receivers, and the specification of the noise and vibration criteria for the proposed works (as identified in the documentation listed in condition 1.1);
 - iii) demonstration that the construction methods (including construction traffic noise) will meet the objectives of the EA and noise criteria. This **must** include an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts where the objectives are predicted to be exceeded;
 - iv) a detailed description of what actions and measures would be implemented to ensure that these works would comply with the relevant noise and vibration criteria;
 - v) procedures for notifying residents of construction activities that are likely to effect their noise and vibration amenity, as well as procedures for dealing and responding to noise complaints;
 - vi) a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be conducted, how the results of this monitoring would be recorded; and;
 - vii) if any non-compliance is detected **with the criteria in condition 2.3 or the noise mitigation measures described in the Noise Management Plan**, a description of what procedures would be followed to ensure compliance.
 - c) a **Traffic Management Plan** to outline management of traffic conflicts associated with the construction of the project. The Plan **must** include, but not necessarily be limited to:
 - i) details of traffic routes used by construction vehicles;
 - ii) the number and type of vehicles to be used in the construction of the project, and their movements to, from and within the site per day;
 - iii) minimum requirements for vehicle maintenance to address noise and exhaust emissions;
 - iv) speed limits to be observed along routes to and from the sites and within the site; and
 - v) behaviour requirements for vehicle drivers to and from the site and within the site.
 - d) a **Dust Management Plan** to outline measures to minimise and manage any impacts from the construction of the project on local air quality. The Plan **must** include, but not necessarily be limited to:
 - i) identification of all major sources of dust that may occur as a result of the construction of the project;
 - ii) description of the procedures to manage the emission of dust from the sources identified;
 - iii) identification of the locations where monitoring of dust emissions is to be undertaken;

- iv) procedures for the monitoring of dust emissions from the project, in accordance with any requirements of the [EPA](#);
- v) protocols for regular maintenance of the construction plant and equipment to minimise the potential for dust emissions;
- vi) a principal requirement to satisfy the relevant goals specified under condition 2.8 [and 2.8A](#) of this approval at all times;
- vii) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise dust impacts during the construction of the project;
- viii) a system for regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the air quality goals specified under condition 2.8 [and 2.8A](#) of this approval;
- ix) pro-active and reactive management and response mechanisms for particulate emissions, with specific reference to measures to be implemented and actions to be taken in a timely manner to minimise and prevent reasonably foreseeable elevated air quality impacts on surrounding land uses as a consequence of meteorological conditions during construction of the project or the specific construction works being undertaken at any particular time; and
- x) description of procedures to be undertaken if any non-compliance is detected.

[The Proponent must implement the management plan as approved from time to time by the Secretary.](#)

Operation Environmental Management Plan

- 5.4 The Proponent [must](#) prepare an **Operation Environmental Management Plan** to detail an environmental management framework, practices and procedures to be followed during the operation of the project. The Plan [must](#) be consistent with the Department's *Guideline for the Preparation of Environmental Management Plans* (DIPNR 2004), and [must](#) include, but not necessarily be limited to:
- i) the complaints handling procedures (conditions 4.2 and condition 4.3 of this approval);
 - ii) the environmental mitigation measures outlined in the Environmental Impact Statement (including those outlined in Table 18-1) and supporting information (as referenced in condition 1.1 of this approval);
 - iii) the Monitoring Program listed under condition 3.1 of this approval; and
 - iv) the Management Plans listed under condition 5.5 of this approval.

The Plan [must](#) be submitted for the approval of the [Secretary](#) no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the [Secretary](#). Operation [must](#) not commence until written approval has been received from the [Secretary](#). Upon receipt of the [Secretary's](#) approval of the Plan, the Proponent [must](#) provide a copy of the Plan to the [EPA](#) and Council as soon as practicable. [The Proponent must implement the management plan as approved from time to time by the Secretary.](#)

- 5.5 As part of the Operation Environmental Management Plan for the project, required under condition 5.4 of this approval, the Proponent [must](#) prepare the following Management Plans:
- a) a **Noise Management Plan** to outline monitoring, management procedures and measures to minimise total operational noise emissions from the project. This plan [must](#) include operational noise management, traffic noise management and train noise management. This plan [must](#) also include, but not necessarily be limited to:
 - i) the *Operational Noise Management Protocol*, as outlined in condition 2.7 of this approval;
 - ii) procedures for monitoring the project;
 - iii) a program for handling and responding to noise complaints.
 - b) a **Traffic Management Plan** to outline measures to manage all heavy vehicle traffic movements associated with the project to minimise impacts on the local and regional road network. This [must](#) include the Transport Management Strategy, a Transport Code of Conduct for heavy vehicles (including contractors).

- c) a **Soil and Water Management Plan** to detail measures to manage and mitigate the impacts of stormwater runoff from and within the site. The Plan **must** be consistent with the Stormwater Management Plan for the catchment (or the guideline contained in Managing Urban Stormwater: Council Handbook (DECCW) should a plan for the catchment not exist). The Plan should include, but not necessarily be limited to:
 - i) details of the monitoring requirements of this approval, specifically the requirements of condition 1.1 of this approval; and
 - ii) details of any contingency measures that would be followed to ensure the protection of groundwater and neighbouring waterways should any non-compliance be detected or during an accident or emergency situation at the site that could result in the contamination of surface water or groundwater; and
 - iii) evidence of compliance with the targets in *Australian and New Zealand Guidelines for Fresh and Marine Water Quality* (ANZECC & ARMCANZ, 2000) October 2000.
- d) a **Dust Management Plan** to outline measures to minimise and manage any impacts from the operation of the project on local air quality. The Plan **must** include, but not necessarily be limited to:
 - i) identification of all major sources of dust that may occur as result of the operation of the project;
 - ii) description of the procedures to manage the emission of dust from the sources identified;
 - iii) identification of the locations where monitoring of dust emissions is to be undertaken;
 - iv) procedures for the monitoring of dust emissions from the project, in accordance with any requirements of the EPA;
 - v) protocols for regular maintenance of equipment, conveyor systems and materials handling facilities to minimise the potential for dust emissions; and
 - vi) a principal requirement to satisfy the goals satisfied under condition 2.8 of this approval at all times, including to the extent that is reasonable and practical, dust suppression considerations in the detailed design of the project;
 - vii) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise dust impacts over the life of the project;
 - viii) a system for regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the air quality goals specified under condition 2.8 of this approval;
 - ix) pro-active and reactive management and response mechanisms for particulate emissions, with specific reference to measures to be implemented and actions to be taken in a timely manner to minimise and prevent reasonably foreseeable elevated air quality impacts on surrounding land uses as a consequence of meteorological conditions or the specific construction works being undertaken at any particular time; and
 - x) description of procedures to be undertaken if any non-compliance is detected.
- e) a **Vegetation Management Plan** as described in condition 2.24 of this approval.

The Proponent **must** implement the management plan as approved from time to time by the Secretary.

5.6 Within 3 months of the submission of an:

- (a) incident report under condition 6.1 below;
- (b) Annual Review under condition 6.3 below;
- (c) Independent Environmental Audit under condition 3.5 or condition 3.5B above; and
- (d) any modifications to this consent,

the Proponent **must** review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. The Proponent **must** notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document **must** be submitted for the approval of the Secretary.

Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.

- 5.7 Where consultation with any public authority is required by the conditions of this consent, the Proponent must:
- (a) consult with the relevant public authority prior to submitting the required document to the Secretary for approval;
 - (b) submit evidence of this consultation as part of the relevant document;
 - (c) describe how matters raised by the authority have been addressed and any matters not resolved; and
 - (d) include details of any outstanding issues raised by the authority and an explanation of disagreement between any public authority and the Proponent.
- 5.8 Any reference to a guideline, policy, standard or similar document that must be taken into account, complied with or otherwise applied under any condition of this consent means a reference to that document or any later version or replacement of that document as it existed at the date at which the document must be applied.

6. ENVIRONMENTAL REPORTING

Incident Reporting

- 6.1 The Proponent **must** notify the EPA and the Secretary of any incident with actual or potential significant adverse off-site impacts on people or the biophysical environment as soon as practicable after the occurrence of the incident ("initial notification"). The Proponent **must** provide written details ("written report") of the incident to the EPA and the Secretary within seven days of the date on which the incident occurred.
- 6.2 The Proponent **must** meet the reasonable requirements of the Secretary to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition 6.1 of this approval, within such period as the Secretary may require.

Note: Condition 6.2 of this approval does not limit or preclude the EPA from requiring any action to address the cause or impact of any incident, in the context of the EPA's statutory role in relation to the project.

Annual Performance Reporting

- 6.3 The Proponent **must**, throughout the life of the project, prepare and submit to the Secretary, an **Annual Review**. The **Annual Review must** review the performance of the project against the Operation Environmental Management Plan (refer to condition 5.4 and condition 5.5 of this approval), the conditions of this approval and other licences and approvals relating to the project. The **Annual Review must** include, but not necessarily be limited to:
- a) details of compliance with the conditions of this approval;
 - b) a copy of the Complaints Register (refer to condition 4.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were address and resolved;
 - c) a comparison of the environmental impacts and performance of the project against the environmental impacts and performance predicted in those documents listed under condition 1.1 of this approval;
 - d) results of all environmental monitoring required under this approval and other approvals, including interpretations and discussion by a suitably qualified person; and
 - e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the project have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident.
- 6.4 The Proponent **must** submit a copy of the **Annual Review** to the Secretary, EPA and Council every year, with:

- i) the first [Annual Review](#) to be submitted within twelve months after the commencement of operation of the project; and
- ii) the second and subsequent [Annual Reviews](#) to be submitted concurrently with the [EPA's](#) Annual Return.

The Proponent [must](#) make the [Annual Review](#) available to the public for inspection upon request.

- 6.5 The [Secretary](#) may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report in relation to compliance with this approval and any comments received from the [EPA](#) and/or Council. Any reasonable action required to be undertaken [must](#) be completed within such period as the [Secretary](#) may agree.

ATTACHMENT 1

MARCH 2011 MODIFICATION STATEMENT OF COMMITMENTS

Final Statement of Commitments

If approval is granted under Section 75W of the EP&A Act for the proposed modifications, and in addition to the Project Approval Conditions for the RDC, Holcim will commit to the following:

Compliance with this EA

1. To carry out the project generally in accordance with the documents listed in condition 1.1.

Noise

2. The following noise controls will be implemented for the modified RDC:

- all conveyor drives and transfer points will be enclosed (or alternative comparative mitigation);
- the most eastern side of the truck load-out facility will be enclosed;
- noise walls will be constructed during the site establishment phase of construction (refer to **Figure 6.1** for noise wall locations. Noise wall specifications are outlined in **Appendix 2**);
- plant design, specification and implementation of the modified RDC to achieve the relevant noise criteria (refer to **Appendix 2**);
- during construction noisy equipment will be situated behind structures that act as barriers or at distance from the noise-sensitive areas, where possible;
- construction plant and equipment will be maintained in good working order;
- during construction 'quiet' practices will be employed when operating equipment (e.g. unloading of trucks away from noise sensitive areas); and
- Holcim will liaise with Blacktown City Council and the Western Sydney Parklands Trust regarding the management of construction noise impacts on Nurragingy Reserve.

Holcim is committed to achieving the noise mitigation outcomes achieved by the above management controls. As technological advances occur and through implementing operational management controls, Holcim may be able to achieve the same noise mitigation outcomes through alternative means. Holcim may therefore modify the above management controls in response to these technological advances or operational controls, provided that the same overall noise management outcomes are achieved.

Air Quality

Construction

3. Holcim will implement the following controls during construction of the modified RDC to minimise dust emissions associated with the Project:
 - minimising all disturbed areas and stabilisation by progressive rehabilitation/stabilisation as soon as practicable;
 - clearly identifying and delineating areas required to be disturbed and ensuring that disturbance is limited to those areas;
 - minimising the area of disturbance by restricting vegetation clearing ahead of construction activities;
 - removal of any material which is tracked onto pavement surfaces at the end of each working day;
 - place hardstand material or install rumble grids at site exit points onto public roads to minimise the tracking of soil onto pavement surfaces;

- all trafficable areas on the site will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dust from the site at all times;
- vegetation will be established on soil stockpiles if they will be undisturbed for a period longer than three months;
- topsoil stripping will be undertaken when there is sufficient moisture content in the soil to minimise dust generation;
- plant and equipment will not be left idling when not in use;
- restricting or ceasing dust-generating activities on extremely windy or dry days; and
- ensuring that all equipment used on site will be maintained in good working order and in accordance with manufacturers specifications to minimise emissions.

Operation

4. Holcim will implement the following controls to minimise dust emissions associated with the operation of the project:

- all conveyor transfer points will be enclosed;
- conveyors will be covered on at least three sides;
- water sprays will be used within the transfer point enclosures, rail unloading facility and in other enclosures as required to further minimise dust;
- water spray systems will be installed to service all stockpiles;
- the rail unloading facility will be enclosed in a building that is open at each end to allow trains to pass through;
- all paved trafficable areas **must** be swept as required by a permanently stationed street sweeper to minimise dust;
- all trafficable areas on the site will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dust from the site at all times;
- plant and equipment will not be left idling when not in use;
- the radial stacker and associated stockpiles will have water sprays which will be used when the facility is in operation, including when loading vehicles, as required to suppress dust;
- vehicle movements will be confined to designated areas, and vehicles will only travel on sealed roads; heavy vehicles entering and leaving the site that are carrying loads **must** be covered at all times, except during loading and unloading activities; and
- ensuring that all equipment used on site will be maintained in good working order and in accordance with manufacturers specifications to minimise emissions.

Ecology

5. In addition to the existing commitments the following mitigation measures will be implemented to further reduce the impact of the modified RDC:

- prior to any clearing operations being undertaken, the limits of clearing will be clearly marked;

- native logs and bark removed during construction will be retained and reused in areas of Cumberland Plain Woodland, during regeneration and revegetation to provide sheltering habitat for the Cumberland land snail;
 - sedimentation and erosion control measures will be put in place and maintained during construction and operation to ensure that soil material does not enter surrounding woodland and waterways; and
 - the post-construction rehabilitation program will use local native plant species and incorporate a weed control program to prevent the spread of weed species into the surrounding woodland landscape.
6. Holcim will consider the small additional area of Cumberland Plain Woodland to be cleared for the modified RDC when establishing the Ecological Offset for the project as part of the preparation of the Vegetation Management Plan required by Project Approval Condition 2.24.

Water Resources

7. All erosion and sediment control measures will be carried out in accordance with relevant guidelines for erosion and sediment control, including Managing Urban Stormwater: Soils and Construction (the Blue Book):
- *Volume 1* (Landcom, 2004); and
 - *Volume 2D Main road construction* (DECC, 2008).

Greenhouse

8. Holcim will develop and implement an Energy Saving Management Plan (ESMP) as part of the Operation Environmental Management Plan. The ESMP will review energy usage, identify energy savings opportunities, and based on this, will implement viable energy saving measures.

Visual

9. The externally visible elements of the on-ground concrete storage bins, the concrete plant silos, concrete batching plant, unloading station and other bulky elements, will be coloured in tones that are sympathetic (i.e. green/brown tones) to the surrounding native vegetation.

Hazard

10. The following control measures will be implemented associated with the development in relation to the high pressure gas pipeline:

Technical control measures include:

- design of piping and structures in accordance relevant standards;
- geotechnical assessment to determine soil stability prior to construction activities;
- use of appropriate equipment to minimise the impact on the pipe in the event of contact; and
- use of process and design controls including limited excavation depths, buffer distances and designated crossings to limit potential for contact with or overstress of the pipe.

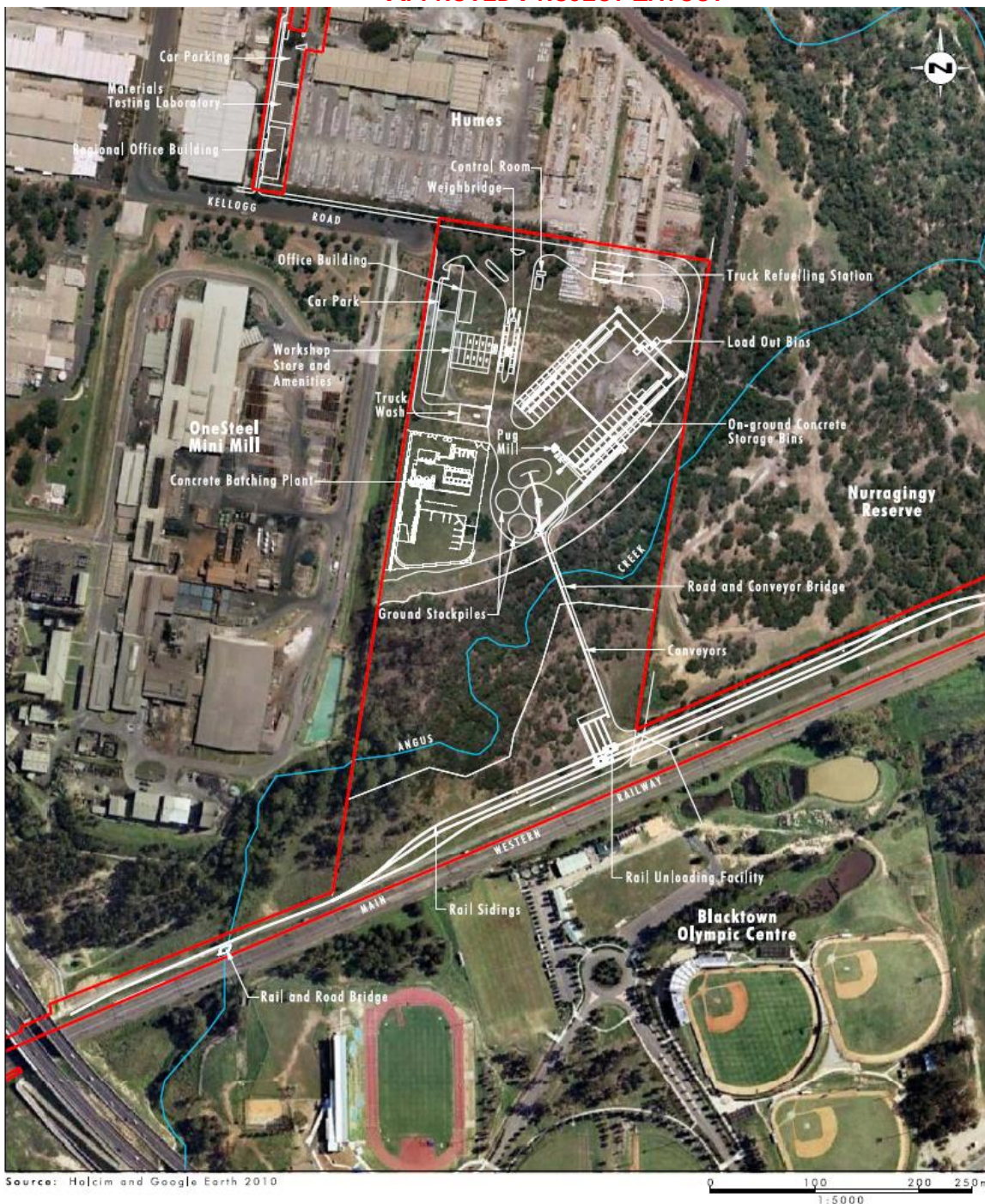
Non-technical safeguards and procedures include:

- assessment of process designs, site layout and design changes;
- procedural control including the pipeline owner's Daily Permit System and site inductions;

- preparation of operating/construction procedures, including awareness and training;
- cessation of operations in adverse weather conditions;
- implementation of site speed limit, driver training, route selection and physical barriers where appropriate;
- provision of physical controls including fencing of siding during construction;
- limiting access to authorised personnel only and implementation of security patrol if necessary;
- appropriate training and supervision of operations; and
- provision of ongoing maintenance and operation procedures.

ATTACHMENT 2

APPROVED PROJECT LAYOUT



Legend

- Approved RDC Site Boundary
- Indicative Modified RDC Layout

FIGURE 1.3
Indicative Modified RDC Layout

Appendix 4 Independent audit declaration form


Project name	Rooty Hill Regional Distribution Centre
Consent	MP05_0051 MOD2
Description of project	Regional distribution centre
Site Address	21 Kellogg Road, Rooty Hill, NSW
Proponent	Holcim (Australia) Pty Ltd
Date	24 March 2025

I declare that I have undertaken the Independent Audit and prepared the contents of the attached Independent Audit Report and to the best of my knowledge:

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Post Approval Requirements (IAPAR 2020).
- ii. the findings of the audit are reported truthfully, accurately and completely.
- iii. I have exercised due diligence and professional judgement in conducting the audit.
- iv. I have acted professionally, objectively and in an unbiased manner.
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child.
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child.
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

- a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and
- b) The *Crimes Act 1900* contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both)

Auditor Name	Annabelle Tungol
Signature	
Qualifications	Master Environmental Auditor (Exemplar Global) Certificate No. 119536 Bachelor of Science in Chemical Engineering 1998
Company	Artea Green Ventures for 4Pillars Environmental Consulting

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Administrative conditions	1.1	Terms of Approval	The Proponent must carry out the project generally in accordance with the: a) Project Application 05_0051; b) Environmental Assessment Report for the Proposed Regional Distribution Centre, Rooty Hill, volumes 1-3, prepared by National Environmental Consulting Services, dated October 2005; c) Response to Issues Raised in Submissions to EAR, prepared by National Environmental Consulting Services, dated February 2006; d) the final Statement of Commitments, submitted by the Proponent to the Department on 17 March 2006; e) the Environmental Assessment Report - Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW prepared by Umwelt (Australia) Pty Limited, dated October 2010; including the Response to Submissions for Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW, dated 9 December 2010, and the March 2011 Modification Statement of Commitments shown in Attachment 2; f) the Environmental Assessment Report – Rooty Hill Regional Distribution Centre Minor Modification, prepared by Umwelt (Australia) Pty Limited and dated February 2017; including the Response to Submissions for Proposed Minor Modification to Holcim Regional Distribution Centre (RDC), Rooty Hill, NSW, dated 16 May 2017; and g) the conditions of this approval.	See below	Some non compliances identified below. Refer to individual conditions. The development is being carried out generally in accordance with the EIS and Development Layout. In line with Department advice regarding this kind of general condition, despite non-compliances with later conditions, we have not noted a non-compliance with this general condition as well. To do so would be to penalise the Proponent twice for the same non compliance and hence bias the results of the audit.	Compliant	NA	NA
MP05.0051 MOD2	Administrative conditions	1.2	Terms of Approval	If there is any inconsistency between the above documents, the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	NA	Noted - in conducting this audit, the most recent document and/or the conditions of consent have been referenced in assessing compliance.	Not triggered	NA	NA
MP05.0051 MOD2	Administrative conditions	1.3	Terms of Approval	The Proponent must comply with any reasonable requirement/s of the Secretary arising from the Department's assessment of: a) any reports, plans or correspondence that are submitted by the Proponent in accordance with this approval; and b) the implementation of any actions or measures contained in those reports, plans or correspondence submitted by the Proponent.	3.04	Non compliant in previous audit. Holcim's team confirmed that there were no actions arising from the Department's assessment of plans and correspondence.	Compliant	NA	NA
MP05.0051 MOD2	Administrative conditions	1.4	Limits of Approval	The Proponent must not distribute more than four million tonnes of construction materials (excluding concrete) a year from the site.	3.01, 3.04	Sales data for aggregate materials confirms annual amounts vary between 900,000 t and 1,100,000 t per year. This was confirmed in anecdotal evidence provided by the Holcim audit team.	Compliant	NA	NA
MP05.0051 MOD2	Administrative conditions	1.5	Limits of Approval	The production capacity of the concrete batching plant must not exceed 200,000 cubic metres per year.	3.02, 3.04	Sales data for concrete confirms that annual amounts vary between 75,000 to 140,000 m3 per year. This was confirmed in anecdotal evidence provided by the Holcim audit team.	Compliant	NA	NA
MP05.0051 MOD2	Administrative conditions	1.6	Limits of Approval	Apart from the delivery of materials for use in the concrete batching plant, and special products, the Proponent must only receive construction materials, being aggregates and sand, at the site by rail, unless otherwise approved by the Secretary on a case-by-case basis. The Secretary's approval to receive materials at the site other than by rail must only be granted with adequate demonstration by the Proponent that exceptional circumstances exist.	3.03, 3.04, 1, 1.03, 2.01	Rail delivery data confirms that only aggregates and sands were received by rail in 2022, 2023 and 2024. This was confirmed via inspection of the material on hand in the yard on the date of inspection, review of aerial images and anecdotal evidence from Holcim team.	Compliant	NA	NA
MP05.0051 MOD2	Administrative conditions	1.7	Limits of Approval	This approval shall lapse five years after the date on which it is granted, unless the works the subject of this approval are physically commenced on or before that time.	3.04	The Site, including the CBP is in the operational phase. The Consent did not lapse and is activated on an ongoing basis.	Compliant	NA	NA
MP05.0051 MOD2	Administrative conditions	1.8	Management Plans/Monitoring Programs	With the approval of the Secretary, the Proponent may prepare and submit any management plan or monitoring program required by this approval on a progressive basis. Where a management plan or monitoring program is required before carrying out the project, or any stage of the project, the plans/programs may be prepared and submitted in relation to either discrete components of the project or for a specified time period.	3.04, 10.01, 10.04	Management plans were not completed on a progressive basis during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Administrative conditions	1.9	Utilities and Services	Prior to the commencement of construction, the Proponent must identify (including, but not limited to the position and level of service) all public utility services on the site, roadway, footpath, public reserve or any public areas that are associated with, and/or adjacent to the site, and/or likely to be affected by the construction and operation of the project.	14.04, 14.05, 3.04	The 2018 IEA considered this Condition as compliant, and identified that two plans with public utility services were referred to, prior to, and during the construction of the Concrete Batching Plant. A services plan referred to in the 2018 IEA lists the utilities present. No construction during the 2024 audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Administrative conditions	1.1	Utilities and Services	The Proponent must consult with the relevant utility provider(s) for those services identified under condition 1.9 and make reasonable arrangements to adjust and/or relocate services as may be required as a result of undertaking the project. The Proponent must bear the full cost associated with providing utilities and services to the site, and restoring any public infrastructure that may be damaged as a result of the project.	14.04, 14.05, 3.04	The 2018 IEA states that no services were identified, and as such consultation was not required. No construction during the 2024 audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Administrative conditions	1.11	Utilities and Services	Prior to the commencement of construction works that may affect services/utilities, the Proponent must provide documentary evidence to the Secretary that the reasonable requirements of the relevant utility provider(s) have been met.	14.04, 14.05, 3.04	The 2018 IEA states that no services were identified, and as such consultation was not required. No construction during the 2024 audit period.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Administrative conditions	1.12	Utilities and Services	Prior to the commencement of construction of the project, the Proponent must undertake a Final Hazard Analysis based on the detailed design of the project and with a particular focus on risks associated with the Sydney to Newcastle Natural Gas Pipeline. The Final Hazard Analysis must be undertaken in accordance with Hazardous Industry Planning Advisory Paper No. 6 - Guidelines for Hazard Analysis (DUAP, 1997) and AS2885 Pipelines - Gas and Liquid Petroleum – Operation and Maintenance. The Final Hazard Analysis must be submitted for the approval of the Secretary prior to the commencement of construction works.	14.04, 14.05, 3.04	The 2018 IEA considered this Condition as compliant, noting a letter from Department of Planning and Infrastructure (6 September 2015), Hazard Analysis approved. No construction during 2024 audit period	Not triggered	NA	NA
MP05.0051 MOD2	Administrative conditions	1.12A	Utilities and Services	Prior to the issue of a construction certificate, the Proponent is to pay \$177,644.00 to Blacktown City Council for infrastructure enhancement within Blacktown local government area.	14.04, 14.05, 3.04	The 2018 IEA considered this Condition as compliant, noting the sighting of a receipt from Blacktown City Council (245378 20 July 2011) for payment of \$177,644.00. No construction during 2024 audit	Not triggered	NA	NA
MP05.0051 MOD2	Administrative conditions	1.13	Structural Adequacy	The Proponent must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA. Notes: Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for the proposed building works. Part 8 of the EP&A Regulation sets out the requirements for the certification of the Project.	14.01	The Occupation Certificate for the CPB has been obtained in this audit. The preceeding CC as dated 8/11/2018 and the OC is dated 30/9/2019. No other buildings, temporary or permanent, have been built during the audit period.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.1	Noise	The Proponent must minimise noise emissions from plant and equipment operated on the site in relation to the project by installing and maintaining, wherever reasonable and practicable, efficient silencers, low-noise mufflers (residential standard) and replacement of reversing alarms with alternative measures, such as flashing lights.	3.04, 9.01, 9.02, 9.03, 9.04, 7.01, 7.02	The noise reports conducted are compliant with the relevant limits.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.1A	Noise	In order to minimise sleep disturbance, the Proponent must operate all shunting to and from the project by groups of rigidly-connected wagons (rakes) or other appropriate technology approved by the Secretary.	3.04, 9.01, 9.02, 9.03, 9.04, 7.01, 7.02	The noise reports conducted are compliant with the relevant limits. Shunting is not generally conducted and deliveries are during daytime hours	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.2	Construction	The Proponent must only undertake construction activities associated with the project, that are audible at any residential receptor, between the following hours: a) 7:00 am to 6:00 pm, Mondays to Fridays, inclusive; b) 8:00 am to 1:00 pm on Saturdays; and c) at no time on Sundays or public holidays.	3.04	No construction activities were conducted during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.3	Operation	The Proponent must design, construct, operate and maintain the project to ensure that the noise contributions from the project to the background acoustic environment do not exceed the maximum allowable noise contributions specified in Table 1, at those locations and during those periods indicated. Table 1 please see -->>	3.04, 9.01, 9.02, 9.03, 9.04, 7.01, 7.02	The noise reports conducted are compliant with the relevant limits. No noise complaints have been received	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.4	Operation	For the purpose of assessment of noise contributions specified under condition 2.3 of this approval, noise from the project must be a) measured at the most affected point on or within the residential boundary, or at the most affected point within 30 metres of the dwelling (where the dwelling is more than 30 metres from the boundary) to determine compliance with LAeq(15 minute) noise limits; or b) measured at 1 metre from the dwelling façade to determine compliance with LA1(1 minute) noise limits.	7.01, 7.02	The methodology outlined in the noise assessment reports was compliant with these requirements	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.5	Operation	Notwithstanding condition 2.4 of this approval, should direct measurement of noise from the project be impractical, the Proponent may employ an alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the EPA's Industrial Noise Policy). Details of such an alternative noise assessment method accepted by the EPA must be submitted to the Secretary prior to the implementation of the assessment method. Section 4 of the Industrial Noise Policy must also apply to the measured noise levels, where applicable.	7.01, 7.02	Direct measurement of noise from the project was possible and no alternative approach was required.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.6	Operation	Noise emission limits specified under condition 2.3 apply under the following meteorological conditions: a) wind speed up to 2ms-1 at 10 metres above ground level; or b) temperature inversion conditions of up to 3 degree C/100m and wind speed up to 2ms-1 at 10 metres above the ground.	7.01, 7.02	Noted.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.7	Operational Noise Management Protocol	<p>Prior to the commencement of operations at the site, the Proponent must prepare and implement an Operational Noise Management Protocol for the project. The Protocol must include, but not necessarily be limited to:</p> <p>a) a principal requirement to satisfy the limits specified in condition 2.3 of this approval at all times, including to the extent that is reasonable and practical, acoustic considerations in the detailed design of the project;</p> <p>b) a system that allows for periodic assessment and reasonable implementation of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA) to minimise noise impacts over the life of the proposal;</p> <p>c) a system of regular auditing to ensure the effective implementation and maintenance of mitigation measures required to achieve the noise limits specified in condition 2.3 of this approval. Acoustic auditing must be conducted by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project.</p> <p>The Protocol must be incorporated into the Operational Environmental Management Plan, required under condition 5.4 and condition 5.5 of this approval. The results of any assessment and auditing under the Protocol must be reported in the Annual Review (refer to condition 6.3 of this approval).</p> <p>A copy of the Protocol must be submitted to EPA and the Secretary prior to the commencement of operations at the site.</p>	10.01, 10.02	Section 3.2 of the OEMP complies with this condition. The original OEMP was established prior to commencement of operations.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.8	Air Quality	<p>The Proponent must design, construct, commission, operate and maintain the project in a manner that minimises dust emissions from the site, as specified in paragraph of the final Statement of Commitments submitted by the Proponent to the Department on 17 March 2006, including:</p> <p>a) all dust control systems for transfer, load out and unloading points, as well as materials handling activities must be designed and operated to comply with a solid particles emission limit of 20 mgm-3 as required by Part 4 of the Protection of the Environment (Clean Air) Regulation 2002;</p> <p>b) all storage bins must be enclosed;</p> <p>c) water spray systems must be installed to service all stockpiles;</p> <p>d) all paved trafficable areas must be swept as required by a permanently stationed street sweeper to minimise dust; and</p> <p>e) the application of Best Management Practice (BMP) and Best Available Technology Economically Achievable (BATEA), where reasonable and practicable, to minimise dust impacts during construction and operation of the project.</p>	3.04, 10.01, 2.01	<p>There continues to be a discrepancy in item (b) the 'enclosure of storage bins'. This is not considered to have a significant environmental impact, as monitoring data is compliant, no dust complaints etc. However, 'bins' as envisaged in the MOD 2 application and other plans were never implemented (we understand there was a design change). This should be addressed, as the Site does not comply with this condition as written. The reference to 'storage bins' has some applicability in the context of the CBP, but is unclear - does it include silos and bays, or both?</p> <p>The 'Indicative Modified RHDC' layout map in Attachment 2 of the consent envisages a pug mill, storage bins in the main yard, conveyors and automated truck loading. The approach that has been taken involves large, open storage bins and manual loading of trucks via FEL. The monitoring data and other lines of evidence (i.e. lack of complaints, observations etc.) suggest the air quality outcomes required at the Site can be achieved based on the current layout; therefore the non-compliance appears to be an administrative one of difference between indicative plans in the Consent and the actual development. This discrepancy should be addressed to minimise regulatory risk for the Proponent.</p>	Non-compliant	NA	The Proponent should consider the most appropriate method to comply with the requirements of this condition. The key options include installation of equipment (i.e. bays/bins, conveyors etc) as envisaged in the Consent, formal communication with the Department regarding the works as executed plan for the Site, or modify the project approval to remove this requirement.
MP05.0051 MOD2	Specific environmental conditions	2.8A	Air Quality	<p>The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 2 at any residence on privately-owned land. Table 2 - refer to consent document.</p>	7.03, 7.04, 3.04, 9.01, 9.02, 9.03, 9.04	<p>No exceedances were identified in dust sentry data for 2023 and 2024. However, HVAS results from 2022 and 2023 exceeded criteria on several occasions. In most cases, other evidence (i.e. meteorological conditions) indicate that the RHDC did not, or was unlikely to have, contributed to the exceedances.</p> <p>The audit team also notes that the criteria apply at residences on privately owned land. The closest residence is several hundred meters away from the Site. No attenuation has been incorporated into the analysis of data that is obtained at the boundary of the Site, so we note that the approach to assessing compliance with this condition is conservative.</p> <p>Noting the discrepancy regarding 'bin enclosure' per Condition 2.8, the design of the Site has not progressed as envisaged in the initial RHDC design. This broader matter of compliance with the general design of the facility has been addressed above in a non-compliance with Condition 2.8. On the weight of evidence, the reasonable and feasible mitigation measures that can be implemented at the Site are being implemented and the audit team is satisfied this condition and its intent is complied with.</p>	Compliant	Continue with best practice dust and air quality management on-site, and look into options to enclose product bin storage areas as conceptualised in the initial RHDC design, or modify the project approval to remove this requirement. Refer to Condition 2.8 for further details.	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.9	Air Quality	All trafficable areas and vehicle manoeuvring areas on the site must be maintained in a condition that will minimise the generation or emission of wind blown or traffic generated dust from the site at all times.	1.02, 1.03, 2.01, 4, 3.04, 7.03	All trafficable and maneuverable areas are sealed, including recent bitumen sealing of storage/stockpile area at rear of the CBP. Trafficable areas are watered and cleaned regularly (timed system - eg water cart every 30 minutes). Wheel wash was observed to be operational.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental	2.10	Air Quality	Heavy vehicles entering and leaving the site that are carrying loads must be covered at all times, except during loading and unloading activities.	3.04	Generally truck covers are automated. Available lines of evidence suggest this is being done consistently.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.11	Internal Roads and Parking	The Proponent must take reasonable measures to ensure that heavy vehicles accessing the site must not queue within the adjacent local road network.	3.04, 2.01, 9.03, 9.04	No queues of trucks observed during the audit. No other evidence such as complaints etc. exist that would suggest non-compliance with this condition.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.12	Internal Roads and Parking	The Proponent must take reasonable measures to ensure that vehicles used for the construction and/or operation of the project must not park on local roads in the vicinity of the project at any time.	3.04, 2.01, 9.03, 9.04	No parking of trucks on public roads observed during the audit. No other evidence such as complaints etc. exist that would suggest non-compliance with this condition.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.13	Internal Roads and Parking	The Proponent must design and construct all internal roads, including associated loading bays, car parking facilities, driveways, ramp grades, turn paths, sight distances and aisle widths, in accordance with relevant RMS and Council codes, including AS 2890.1 – 2004 and AS 2890.2 – 2002.	14.04, 14.01	The 2018 IEA confirmed compliance with this condition. OC now also sighted for the CBP.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.14	Internal Roads and Parking	The Proponent must clearly mark all visitor, disabled, ambulance and service vehicle parking areas.	3.04	Confirmed via site inspection	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.15	Train Operations	The Proponent must seek approval from Rail Corporation New South Wales for the allocation of freight train paths into and out of the site from the Main Western Line.	14.04	Evidence verified during 2018 IEA - Email correspondence from Pacific National (Peter Lew) dated 25 June 2014 providing approval for freight rail paths. No change since that time.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.16	Access	The Proponent must negotiate with the owner of the OneSteel site to use that land for access to the southern sections of the project site for the construction of the Angus Creek road bridge. Should the Proponent and the owner of the OneSteel site be unable, after reasonable attempts, to negotiate for access through that site, the Proponent may seek the Secretary's agreement to access the project site via the Knox Road/Nurragingy Reserve access point. In seeking the Secretary's agreement, the Proponent must demonstrate to the Secretary's satisfaction that it has applied all reasonable endeavours to negotiate an outcome that avoids the use of the Knox Road/Nurragingy Reserve access point. Note: The environmental impacts associated with the use of both access points have been assessed and are considered to be acceptable in both cases. However, the use of the OneSteel site for construction access is considered to pose reduced residual environmental impacts, and is therefore the preferred outcome. If the Knox Road/ Nurragingy Reserve access is utilised, residual environmental and public safety impacts must be comprehensively managed, as required under the conditions of this consent.	3.04	Access from One steel site was not able to be negotiated. Regardless the access from the Knox Road/Nurragingy Reserve was not required for construction purposes. This condition is no longer relevant as the construction phase is finished.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.17	Access	In the event that the Secretary agrees under condition 2.16 to site access for the construction of the project via the Knox Road/ Nurragingy Reserve access point, the Proponent must limit vehicles using that access point to 40 vehicle movements per day (20 round trips per day) until the completion of the Angus Creek road bridge. Once the road bridge has been constructed, access to the site during construction must be restricted to via Kellogg Road.	3.04	See 2.16	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.18	Access	In the event that the Secretary agrees under condition 2.16 to site access for the construction of the project via the Knox Road/ Nurragingy Reserve access point, the Proponent must develop, in consultation with Council, a Construction Access Management Program to comprehensively mitigate and manage impacts associated with construction access via Knox Road/ Nurragingy Reserve. The Program must include, but necessarily be limited to: a) scheduling of vehicle movements to avoid peak public usage times within the Reserve; b) vehicle access, speed, route and manoeuvring requirements to apply to traffic passing through the Reserve to ensure public safety, minimisation of dust generation, minimisation of traffic noise impacts and the protection of flora and fauna; c) arrangements for surveys of existing road infrastructure standards within Knox Road/ Nurragingy Reserve before and after use of the infrastructure for site access; d) arrangements for funding and implementation of ameliorative works should surveys of road infrastructure indicate a deterioration in the standard of the infrastructure as a result of construction vehicle access; e) consideration of pavement strengthening/ repairs of the access route and the structural stability of the causeway over Eastern Creek, prior to use; f) consideration of widening and/ or appropriate traffic management to ensure safe passing opportunities; and g) the cost of the works required as part of the Program to be borne by the Proponent. The Proponent must submit the Program to the Secretary for approval prior to the use of the Knox Road/ Nurragingy Reserve access point.	3.04	See 2.16	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.19	Access	Access to the site during operation of the project must be via Kellogg Road and Woodstock Avenue. Access to the site via North Parade must be for maintenance purposes or emergency access only.	3.04, 2.01	The main site access was confirmed during the site inspection. The North parade entrance was gated in several locations and available lines of evidence confirm it is only to be used for emergency access.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.20	Road Improvements	Prior to the commencement of operation of the project, the Proponent must upgrade the intersection of Kellogg Road and Woodstock Avenue by constructing a one-lane roundabout capable of accommodating B-double vehicles, or by installing traffic signals, in accordance with the relevant standards. The Proponent must carry-out and pay 100% of the cost of the design and construction works for the roundabout (or traffic signalisation) and, if any, the full cost of any land acquisition necessary in order to carry out the works.	14.04	Evidence verified during 2018 IEA - Letter from Blacktown City Council (construction contractor) (14 November 2013), reference Nadeem Shaikh, confirming agreement for the full payment of the works for the Kellogg Road upgrade and the Power Street/Glendenning Road roundabout. Not triggered during 2024 audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.20A	Road Improvements	Subject to condition 2.20, prior to the commencement of construction of the project, the Proponent must develop, in consultation with Council and RMS, a schedule for the implementation of road upgrades necessary for the implementation of the project, as specified under this approval and the EAR and as amended by the conditions of this approval. The schedule must include, but not necessarily be limited to: a) timing and coordination of the road works recommended in section 7.10 of the EAR for the project, having regard to the timing for implementation of the project coordination of all road works to minimise conflict with other road users; b) provision for the finalisation of detailed design of road works, in consultation with Council and the RMS, and in accordance with relevant design guides and criteria specified by those parties; c) design of operational access routes to the site to cater for B-Double vehicles where appropriate and in accordance with RTA Road Design Guide and the AUSTRROADS Pavement Design Guide; d) arrangements for the funding of road works by or on behalf of the Proponent, fully reflecting the percentage of heavy road traffic contributed by the project to site access routes; and e) with respect to Kellogg Road: i) an independent assessment of the condition of the pavement and the pavement life for the travel lanes in Kellogg Road must be undertaken by a road pavement specialist; ii) the required pavement works and cost to upgrade the road pavement for the current traffic volumes using travel lanes in Kellogg Road over the design life (typically 20 years) must be determined; iii) the required pavement works and cost to upgrade the road pavement for the current traffic volumes plus traffic generated by the project using travel lanes over the design life (typically 20 years or the same design life adopted for (ii)) must be determined; and iv) the Proponent must pay the difference in costs for the works required under ii) and iii) above; f) provision for the appointment of an independent civil or traffic engineer to certify the adequacy of road works design (consistent with this condition) and the adequacy of the works once constructed. In the event of any dispute with respect to the scope or content of the schedule	14.04	Evidence verified during 2018 IEA - Correspondence from Blacktown City Council (28 July 2011) that this condition has been satisfied. Receipt provided from Blacktown City Council (22 April 2015) for the amount of \$273,082.00 being the works and maintenance contribution for Kellogg Road.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.21	Transport Noise Management Strategy	<p>Prior to the commencement of operations, the Proponent must prepare, a Traffic Noise Management Strategy for the project for the project. The Strategy must be designed to ensure best practice noise management strategies for vehicle movements associated with the project to minimise noise generated by heavy vehicles movements. The Strategy must include, but not necessarily be limited to, the following:</p> <p>a) measures to ensure that the commitments for minimising/managing traffic noise as identified in the EAR and supporting information submitted to the Department for the project are effectively implemented. This must include the incorporation of these requirements in contractual agreements made by the Proponent;</p> <p>b) a program of driver training to ensure that drivers are aware of route restrictions applicable to the project and to ensure that noisy vehicle practices are not undertaken during approach or departure from the site, including the restriction/prohibition on the use of compression engine brakes;</p> <p>c) a scheme of fleet selection and maintenance that reflects best noise practice/technology as far as practicable;</p> <p>d) measures to ensure the flexible scheduling of movements to reduce impacts on residential areas during sensitive times of the day and night;</p> <p>e) communication and management strategies for heavy vehicles associated with the project (including those not owned by the Proponent) to ensure the requirements of the Strategy are met;</p> <p>f) a community consultation program, including a complaints line for the community to report movements that do not abide by the Strategy (refer to condition 4.2 and condition 4.4 of this approval);</p> <p>g) the incorporation of an audit and monitoring program for the Strategy to determine compliance with the Strategy by heavy vehicles associated with the project and to evaluate the effectiveness of strategy in minimising traffic noise (refer to condition 3.1c) of this approval). The Proponent must not commence operations until the Secretary has approved the Traffic Noise Management Strategy. The Strategy must be incorporated into the Operational Environmental Management Plan for the project (refer to condition 5.4 and condition 5.5 of this approval). The</p>	10.01, 10.02	Section 3.3 of the OEMP incorporates the Transport (traffic) noise management strategy.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.21A	Transport Noise Management Strategy	<p>The number of on-site car and truck parking spaces to be provided for the project must be in accordance with sections 5.4.3, 5.4.4 and 5.4.6 of the EAR, as follows:</p> <p>a) truck parking: 50 spaces (truck and dog configuration);</p> <p>b) car parking: a total of 310 spaces on the RDC and Humes sites, as follows:</p> <p>ii) RDC site: 121 spaces;</p> <p>ii) Regional office and laboratory: 189 spaces, of which 84 are to be allocated to the RDC staff and visitors and 105 are to be allocated to the staff and visitors to the existing Humes development;</p> <p>c) all car parking spaces must be marked/ signposted in accordance with the above allocations. All visitor spaces must be located conveniently in relation to the various administrative offices on the site and must be clearly marked and signposted;</p> <p>d) all car and truck parking spaces must be sealed in a hardstanding material and drained in accordance with the approved stormwater management plan for the project;</p> <p>e) the design and dimensions of all truck and car parking spaces, together with all associated access roads and manoeuvring areas, must be in accordance with AS2890.2(2002);</p> <p>f) a detailed car and truck parking plan, at a scale of 1:200, and incorporating the above requirements, must be submitted for the approval of the Secretary prior to the commencement of any works.</p>	3.04, 2.01, 10.01	<p>This condition has not been met at this stage, as construction of all approved components (eg laboratory) had not been completed on the date of the site audit. The status on the date of the site audit was:</p> <ul style="list-style-type: none"> there are approximately 14 delineated truck (and dog) parking spaces currently; there are approximately 38 delineated car parking spaces provided adjacent the site office/administration (including 2 disabled); all parking areas sealed and drained to the site stormwater system; truck and vehicle turning and maneuvering areas appear to be constructed in accordance with the AS2890.2 (2002). <p>Based on staff numbers and site observations, there are adequate light vehicles spaces on the site currently.</p> <p>It is understood that Holcim do not propose to develop the Regional office and laboratory site. Therefore the 189 spaces will not be required.</p>	Non-compliant	NA	The Project Approval should be modified to reflect the number of required parking sites in the absence of a laboratory facility being constructed on site. The number of car spaces required for the RHDC Site should also be revised to reflect actual requirements. This may be done via formal correspondence with the Department or modify the project approval to adjust this requirement. See also Recommendation at Condition 2.8.
MP05.0051 MOD2	Specific environmental conditions	2.22	Flora and Fauna	The Proponent must minimise any clearing of vegetation in carrying out of the project, consistent with a Vegetation Management Plan developed to the satisfaction of the DPI Water and OEH under condition 2.24 of this approval.	3.04, 2.01, 7.07, 7.08	Aerial images and site observations confirm that clearing has not occurred outside of the approved project boundary and disturbance footprint. Vegetation areas to be retained are in good condition and physically separated by fences and gates. Vegetation Management Plan appears as Section 3.7 of the OEMP.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.23	Flora and Fauna	Prior to the commencement of any earthworks or vegetation clearing at the site, vegetation to be protected is to be fenced off with clearly visible, durable, and appropriately signposted exclusion fencing in accordance with any specific requirements identified in the Vegetation Management Plan prepared under condition 2.24.	3.04, 2.01, 7.07, 7.08	Vegetation areas to be retained are in good condition and physically separated by fences and gates.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.24	Flora and Fauna	Prior to the commencement of any construction activities, the Proponent must prepare to the satisfaction of the DPI Water and OEH, a Vegetation Management Plan in accordance with the DPI Water guidelines How to Prepare a Vegetation Management Plan – Version 4 and Watercourse and Riparian Zone Rehabilitation Requirements as well as OEH Recovering Bushland on the Cumberland Plain. The Plan must include drawings that clearly show vegetation to be retained/removed, plant material to be used for rehabilitation, densities and species mix for areas to be rehabilitated, establishment methods, sequencing of tasks, maintenance and performance monitoring. Site rehabilitation and maintenance is to be carried out in accordance with the Plan, and the DPI Water is to be advised of the person responsible for any seed or vegetative propagation prior to the commencement of that propagation. The Proponent must implement the management plan as approved from time to time by the Secretary.	10.01, 10.02	The Vegetation Management Plan is included as 3.7 of the OEMP. The 2023 OEMP has been submitted and approved by the Department during the audit period.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.25	Flora and Fauna	All rehabilitated and revegetated areas of the site must be maintained and monitored for a period of at least five years after final planting, or where other revegetation methods are used, five years from when plants are of tube stock size and are at the densities specified in the Vegetation Management Plan. Maintenance must include sediment and erosion control, watering, weed control, replacement of plant losses, disease and insect control, protection from any mowing or slashing on adjacent land, mulching and any other requirements necessary for achieving successful vegetation establishment.	14.04, 14.05, 7.07, 7.08	Initial plantings were completed in October 2017. The five year minimum maintenance period, and associated conditions expired in October 2022. The Proponent may intend to continue to carry out maintenance and/or monitoring on a voluntary basis and can articulate this in later versions of the Vegetation Management Plan, contained in the OEMP. Reports available for 2022 confirm monitoring and maintenance was conducted until at least end of 2022. Revegetation monitoring reports for 2023 and 2024 were not	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.26	Flora and Fauna	Immediately after completion of initial planting/seeding and every year thereafter for the duration of the maintenance period the Proponent must submit to the Department a monitoring report addressing the performance criteria as specified in the Vegetation Management Plan, and comment on the stability and condition of any stream works. With each monitoring report, the person responsible for implementing the Vegetation Management Plan must certify in writing that plantings (including follow-up plantings) have been carried out using stock propagated from seed or plant material collected only from native plants from the local botanical provenance.	14.04, 14.05, 7.07, 7.08	Initial plantings were completed in October 2017. The five year minimum maintenance period, and associated conditions expired in October 2022. The Proponent may intend to continue to carry out maintenance and/or monitoring on a voluntary basis and can articulate this in later versions of the Vegetation Management Plan, contained in the OEMP. Reports available for 2022 confirm monitoring and maintenance was conducted until at least end of 2022. Revegetation monitoring reports for 2023 and 2024 were not	Compliant	TBC	TBC
MP05.0051 MOD2	Specific environmental conditions	2.27	Compensatory	Prior to the commencement of any part of the construction works that will result in the removal of the endangered ecological communities of the Cumberland Plain Woodland a compensatory habitat package must be established in consultation with the OEH. The package must include one or more of the following compensatory measures: a) provision of no less than 3 hectares of compensatory habitat comprising of Cumberland Plain Woodland, whether new or restored, for every 1 hectare of “Core Habitat” or “Support to Core” habitat impacted; or b) equivalent financial contribution to a rehabilitation project in the Blacktown local government area; or c) any other form of compensatory habitat agreed by the OEH. In the event of any dispute with respect to the scope or content of the compensatory habitat package, the dispute must be referred to the Secretary, whose determination of the dispute must be final and binding on all parties.	14.04	Evidence verified during RHDC IEA 2018t: Letter from Western Sydney Parklands Trust (5 July 2011), reference Yoland Gil, advising acceptance of \$277,350.00 as a compensatory habitat package. Completed prior to this audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.28	Compensatory	Nothing in this approval precludes the inclusion of on-site rehabilitation works referred to under conditions 2.24 to 2.26, in consultation with the OEH, from inclusion as part of the compensatory habitat package required under condition 2.27.	14.04	Evidence verified during RHDO IEA 2018 - Letter from Western Sydney Parklands Trust (5 July 2011).	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.28A	Aquatic Ecology	The Proponent must monitor aquatic ecology in Angus and Eastern Creeks as outlined in the Statement of Commitments, and must expand this monitoring program to: a) ensure that baseline data is collected, including commencement of sampling not less than six months before commencement of construction and the use of control sites; b) include monitoring of water quality and aquatic ecology at four locations within Nurragingy Reserve; c) not include the site sampled on Eastern Creek (“E01” – in Technical Report 4 of the EAR) as a monitoring site, but use at least two other locations; and d) make provision for monitoring in relation to wet and dry periods.	7.09, 7.1, 7.11, 7.12	Aquatic ecology monitoring by Niche Environment and Heritage (Niche) including quarterly visual monitoring, and bi-annual aquatic survey and reporting. Information in annual reviews noted.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.29	Surface Water	Except as may be expressly provided by an Environment Protection Licence for the project, the Proponent must comply with section 120 of the Protection of the Environment Operations Act 1997, which prohibits the pollution of waters.	7.09, 7.1, 7.11, 7.12, 3.04	Site visit observations confirmed that settlement pond wetlands, gabion riffle beds and sediment capture devices are all installed. Angus Creek was flowing and appearance of the watercourse was of a good standard. Available reports and monitoring data and other lines of evidence suggest this condition continues to be met.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.30	Surface Water	The Proponent must ensure that all proposed works within, or connected to Angus Creek are designed, constructed, operated and maintained in compliance with the DPI Water's Draft Guidelines – Watercourse Crossing Design & Construction and NSW Fisheries' Why do Fish Need to Cross the Road? – Fish Passage Requirements for Waterway Crossings (2004) and Policy and Guidelines for Fish Friendly Waterway Crossings (2004).	3.04	No works took place directly within or connected to Angus Creek during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.31	Surface Water	The Proponent must generally design, construct and maintain all stormwater management infrastructure on the site having regard to: a) restriction of future stormwater flows from the site to existing flow levels or better and utilising Council's On-Site Stormwater Detention Policy dated February 2005, as a guide; b) management of all stormwater to minimise the discharge of sediments and other pollutants from the site. This must include the use of gross pollutant traps to screen captured stormwater prior to discharge; c) Landcom's Managing Urban Stormwater: Soils and Conservation, 4TH edition March 2004 and Managing Urban Stormwater Soils and Construction: Volume 2D Main Road Construction; d) compliance with the relevant provisions in the New South Wales Government's Best Practice Guidelines for Contaminated Water Retention and Treatment Systems 1994; e) prevention of the drainage of stormwater onto neighbouring properties and adjoining roadways; f) prevention of overloading Council's stormwater infrastructure by site discharges during heavy rainfall events; g) Council's Stormwater Quality Control Policy dated 1 June 2005; h) from the date of approval of MOD 2, Part J of the Blacktown Development Control Plan (2015), titled Water Sensitive Urban Design and Integrated Water Cycle Management (in place of the document listed in paragraph g) above); and i) current water-sensitive design best-practice guidelines, such as Sensitive Urban Design Technical Guidelines for Western Sydney (Upper Parramatta River Catchment Trust) dated May 2004. Prior to the commencement of construction of the project, the Proponent must submit to the Secretary, certification from a qualified, independent civil engineer that the stormwater management systems for the site have been designed generally in accordance with the above	7.09, 7.1, 7.11, 7.12, 3.04	Design and construction confirmed in prior IEAs. Maintenance and operation appears to be in accordance with relevant requirements. Water quality in Angus Creek, based on observations and monitoring data is of a reasonable standard and there is no evidence to suggest water quality is being adversely affected by the operation of the Site.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.32	Surface Water	The Proponent must obtain Rail Corporation New South Wales endorsement for any on site drainage works to ensure that the project does not result in the flooding of the Main West Railway Line.	14.04	Evidence verified during IEA 2018 - Sighted RailCorp Rooty Hill - Holcim Siding Project - comments register, confirming concept design and detailed design elements for drainage and flooding endorsed by Rail Corporation of NSW. Not triggered in this	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.32A	Surface Water	All stormwater management measures located within the 1% AEP extent of inundation must be designed and constructed to have minimal impact on the 1% AEP flood regime.	14.04	Evidence verified during IEA 2018 - Sighted KBR flood study review (Holcim Rooty Hill Sidings - Angus Creek Flood Study - 23 March 2012). Site audit and aerial photography confirmed location. Not triggered in this audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.33	Visual Amen	The Proponent must ensure that all external lighting associated with the project is mounted, screened, and directed in such a manner so as not to create a nuisance to the surrounding environment, properties and roadway. The lighting must be the minimum level of illumination necessary and must comply with AS 4282(INT) 1997 – Control of Obtrusive Effects of Outdoor Lighting.	3.04, 9.01, 9.02, 9.03, 9.04	Site visit occurred during daylight hours so lights were not on, however all lighting appears to be directed to the work area only and unlikely to cause light spill nuisance. No complaints regarding lighting have been received and no comments from regulatory authorities	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.34	Visual Amen	Prior to the commencement of site preparation activities associated with the project, the Proponent must submit for the approval of the Secretary, a detailed Landscape Plan for the whole of the project (including the proposed administrative building) prepared by a qualified landscape architect, and consistent with the Landscape Master Plan detailed in the EAR, as amended by any requirement specified elsewhere in this approval. The Plan must include(provided it is consistent with and not in derogation of the Vegetation Management Plan in condition 2.24) the following: a) species that are predominantly endemic to the locality (that is from the River-Flat Eucalypt Forest and Cumberland Plain Woodland communities) and including details of, but not limited to, the number and type of species, the pot sizes, details of mulching, and staking; b) planting to visually screen the project as far as practicable when viewed from nearby residential properties and public areas. Particular attention must be given to screening the project, where practicable, from lines of site towards the Nurragingy Reserve and Blacktown Olympic Park; and c) the setback to the road frontages (of at least 7.1 metres) must be comprehensively landscaped.	14.04	Evidence verified during IEA 2018 - Letter from the Department of Planning and Infrastructure (29 September 2011), providing approval for the Landscape Management Plan. As there has been no significant change in the project footprint and scope, no changes or updates to this plan have been necessary during the audit period. Therefore no actions associated with this condition have been triggered in this audit.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.35	Visual Amen	This approval does not permit the display of any advertisement, or the erection of any advertising structure, on the site. This condition does not apply for any advertisement or structure that cannot be seen from the nearest public space, or any signage specified elsewhere in this approval	3.04	No advertising structures are present on the Site.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Specific environmental conditions	2.36	Waste	The Proponent must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated by the project to be disposed of at the site, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997. Note: The above condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the premises if it requires an environment protection licence under the Protection of the Environment Operations	3.04	Waste storage and disposal containers on the Site included several skip bins in the distribution centre and accumulated concrete washout waste in bays in the CBP. Based on documentation, observations and interviews with staff, no evidence has been found that would suggest waste materials are being received from off site.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.37	Heritage	Should any Aboriginal relics be uncovered during any of the construction activities, all construction work in the vicinity of the relic must cease and the Proponent must contact OEH and the Local Aboriginal Land Council as soon as practicable. The Proponent must meet the requirements of the OEH with respect to the treatment, management and/or preservation of any such relic.	3.04	No construction activities were conducted during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.38	Dangerous Goods	All chemicals, fuels and oils must be stored in appropriately bunded areas, with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund. The bund(s) must be designed and installed in accordance the requirements of the EPA's Environmental Protection Manual Technical Bulletin Bunding and Spill Management.	3.04, 1.12, 1.13, 1.14, 1.18, 1.19, 1.2	There were no ad hoc stores of liquids or chemicals throughout the Site. There were some IBCs observed in the CBP that had been delivered and were awaiting storage in the nearby shed. The main lubricant and chemical store, inside the workshop was maintained to a very high standard and the bunding and maintenance of this area was of a high standard. The audit team commends the Proponent for the excellent attention to bunding and liquid storage, which minimises the risk of spills.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.39	Fire Safety	The Proponent must ensure that all operations and activities occurring at the site are carried out in a manner that prevents and/or minimises the risk of fire.	3.04, 10.01	Fire systems noted to be operational, and fire safety equipment (eg extinguishers) in place. No significant combustible materials stored on Site.	Compliant	NA	NA
MP05.0051 MOD2	Specific environmental conditions	2.40	Fire Safety	The Proponent must provide appropriate fire-fighting equipment at the site, and must ensure appropriate volumes of emergency supplies of water (for fire fighting purposes), is provided at the site at all times during operations to ensure an appropriate response to any fire event.	3.04, 10.01	Fire systems noted to be operational, and fire safety equipment (eg extinguishers) in place. No significant combustible materials stored on Site. The Site is connect to the mains hydrant system and sufficient water is available. Fire system testing is conducted on a regular basis.	Compliant	NA	NA
MP05.0051 MOD2	Environmental monitoring and auditing	3.1	Operational Monitoring Plan	<p>Prior to the commencement of operation of the project, the Proponent must prepare an Operational Monitoring Plan for activities associated with the project. The Monitoring Plan must include, but not be necessarily be limited to, the following components:</p> <p>a) a Noise Monitoring Program. The program must monitor noise levels during operational activities. The Monitoring Plan must include, but not be necessarily be limited to, the following components:</p> <p>i) identification of noise monitoring locations;</p> <p>ii) scheduling of noise monitoring, with reference to day, evening and night-time periods;</p> <p>iii) provisions and procedures for determining LAeq(15 minute), LA90(15 minute) and LA1(1 minute)noise levels;</p> <p>iv) review and assessment mechanisms to establish and address noise impacts on residential receptors;</p> <p>v) such monitoring must be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project.</p> <p>b) an Ambient Dust Monitoring Program. The program must provide for continuous monitoring of ambient dust concentrations (PM10) at no fewer than two locations at and around the site, as approved by the Secretary. The monitoring must employ the sampling and analysis methods specified under AM-18 or AS3580.9.8 and results of this monitoring must be recorded in 7gm-3to demonstrate compliance with condition 2.8A.</p> <p>c) a Transport Monitoring Program to monitor traffic movements and driver behaviour of heavy vehicles associated with the project. This program must be applied to all heavy vehicles associated with the project. The Program must include, but not necessarily be limited to:</p> <p>i) details on the monitoring program, such as the frequency and methodology of the monitoring program. This program must include (but not be limited to) the 'spot' auditing of transport movements and driver behaviours at various operational times;</p> <p>ii) a regular internal review of results from the monitoring program to assess the performance of</p>	10.01, 10.02, 3.04	Operational monitoring requirements are incorporated into the 2023 OEMP that has been approved.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Environmental monitoring and auditing	3.2	Operational Monitoring Plan	<p>The Proponent must review the Operational Monitoring Program referred to under condition 3.1 on a six-monthly basis, and may, with the agreement of the Secretary, alter the frequency and/ or scope of monitoring provided:</p> <p>a) pollutant/ parameter monitoring has been undertaken for a period of no less than six months (measured from the commencement of operation of the project);</p> <p>b) there has been no exceedence of any limit placed on the subject pollutant or parameter, through this consent or any Environment Protection Licence under the Protection of the Environment Operations Act 1997 within the preceding six-month period;</p> <p>c) there has been no reasonable complaint received from the public in relation to the subject pollutant/ parameter within the preceding six-month period (refer to condition 4.3 of this approval); and</p> <p>d) the EPA raises no objection to the proposed alteration to the frequency of pollutant/ parameter monitoring.</p>	10.05, 10.06	<p>Anecdotal evidence from Holcim staff indicate that management plans are reviewed for any necessary changes on at least a 6 monthly basis. The audit team was able to obtain documentary evidence for some 6 monthly periods (i.e. July 2024) that were submitted to the Department. The 'Review tracker' sheet was sighted during the audit and this document is used to track reviews as they are conducted, whether revisions are made to management plan(s) or not. There is no requirement to submit to the Department if no revisions are needed, so the Review Tracker is the primary document to demonstrate compliance.</p> <p>In some instances where a review is conducted and there are no changes needed, it appears that if the Proponent does not require any changes to the document, that a record is not created of that process. The audit team is satisfied that the documents are being regularly reviewed and updated, reflect the Site operations and better practice and are fit for purpose. An observation has been raised for this item that relates to improving documentation.</p>	Compliant	NA	NA
MP05.0051 MOD2	Environmental monitoring and auditing	3.3	Noise Audit	<p>Within 90 days of commencement of operations associated with the project and during a period in which the project is operating under normal operating conditions, the Proponent must conduct a Noise Audit of its operations. This Audit must:</p> <p>a) be undertaken by an appropriate and recognised acoustic engineer, who is independent of, or not associated with, any organisation that has been involved with the acoustic assessment of the application (the subject of this approval), or involved in any supervision or designs associated with the construction of the project;</p> <p>b) assess whether the project is complying with the criteria specified in condition 2.3 of this approval;</p> <p>c) identify what additional measures could be implemented to ensure compliance should any non-compliance be detected; and</p> <p>d) provide details of any complaints received relating to noise generated by the project, and action taken to respond to those complaints.</p>	14.04	<p>Evidence verified during 2018 Holcim IEA - A noise audit was undertaken on the site (22-23 February 2016) by Golders Associates and found the noise generated from the use of the premises was in compliance with the development consent conditions.</p> <p>This condition is closed out and therefore not triggered in this audit period.</p>	Not triggered	NA	NA
MP05.0051 MOD2	Environmental monitoring and auditing	3.4	Noise Audit	<p>Within 28 days of conducting the Audit referred to under condition 3.3 of this approval, the Proponent must provide the Secretary and the EPA with a copy of the Noise Audit report. If the Noise Audit identifies any non-compliance with the noise limits imposed under this approval, the Proponent must detail within 30 days what additional measures would be implemented to ensure compliance, clearly indicating who would implement these measures, when these measures would be implemented, and how the effectiveness of these measures would be measured and reported to the Secretary. These ameliorative measures must be completed, if practicable, within 30 days of submission of the Noise Audit to the Secretary and a second noise audit must be conducted demonstrating acoustic compliance. If it is not practicable to complete the ameliorative measures within the 30 day period they should be undertaken in accordance with a timetable approved by the Secretary and the EPA</p>	14.04	<p>Evidence verified during 2018 Holcim IEA - Letter to NSW Department of Planning and Environment (18 March 2016), with noise audit as appendix. AEMR prepared for the period 1 October 2015 to 30 September 2016 (dated 28 September 2016).</p> <p>This condition is closed out and therefore not triggered in this audit period.</p>	Not triggered	NA	NA
MP05.0051 MOD2	Environmental monitoring and auditing	3.5	Independent Environmental Auditing	<p>The Proponent shall commission an independent person or team to undertake an Environmental Audit of the project at six months, and at two years after the commencement of operation of the project, and then as may be directed by the Director-General. The independent person or team shall be approved by the Director-General prior to the commencement of the Audit. The Audit shall:</p> <p>a) be carried out in accordance with ISO 19011:2002 - Guidelines for Quality and/or Environmental Management Systems Auditing;</p> <p>b) assess compliance with the requirements of this approval, and other licences and approvals that apply to the project;</p> <p>c) assess the environmental performance of the project against the predictions made and conclusions drawn in the documents referred to under condition 1.1 of this approval; and</p> <p>d) review the effectiveness of the environmental management of the project, including any environmental impact mitigation works.</p> <p>An Environmental Audit Report shall be submitted to the Director-General within two months of the completion of the Audit, detailing the findings and recommendations of the Audit and including a detailed response from the Proponent to any of the recommendations contained in the Report. The Director-General may require the Proponent to undertake reasonable works to address the findings or recommendations presented in the Report in relation to compliance with this approval. Any such works shall be completed within such time as the Director-General may require. Note: This condition only requires audits to be undertaken and reported for the period prior to the approval of MOD 2.</p>	14.04	<p>The first audit was undertaken for the period 1 October 2015 to 31 March 2016. EMM was commissioned to undertake the an IEA on 27 July 2017 (RHDC IEA 2018).</p> <p>This condition is closed out as MOD2 is activated and this condition is not triggered in the audit period.</p>	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Environmental monitoring and auditing	3.5A	Independent Environmental Auditing	<p>Within a year of the date of the approval of MOD 2, and every three years thereafter, unless the Secretary directs otherwise, the Proponent must commission and commence, and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <p>(a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;</p> <p>(b) include consultation with the relevant agencies;</p> <p>(c) assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);</p> <p>(d) review the adequacy of strategies, plans or programs required under the abovementioned approvals;</p> <p>(e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and</p> <p>(f) be conducted and reported to the satisfaction of the Secretary.</p>	3.04, 14.04, 14.05	<p>MOD2 was approved on 29 June 2017. The due date for the first audit was therefore 29 June 2018. An audit was conducted by EMM for the period to 12 December 2017 (published in 2018). MOD2 was approved on 29 June 2017. The previous audit (undertaken for the period 31 March 2016 to 12 December 2017) notes "Given that the majority of the audit period was prior to the approval of MOD2, Condition 3.5 has been applied. However, it is noted that agencies were consulted as part of this audit." The 2022 EIA found that this condition had not been complied with during that audit period.</p> <p>The due date for the next audit was 12 December 2020. However, the audit was delayed to 17 November 2021 due to Covid-19 restrictions. This was communicated to and agreed to by the Department. The 2022 IEA stated that the next audit was identified as falling due in November 2024.</p> <p>However, the audit team notes verbal advice from DPHI to the Proponent, and standard practice in other similar situations, is to revert to the original audit timing in the event of an interruption that causes an audit that is out of sync.</p> <p>When this is considered, the due date for completing the audit would be 3 years since the previous one, but reverting to the original date. This gives an audit due date of 12 December 2024. This audit was conducted on 12 December 2024, which is compliant with the Condition.</p>	Compliant	The next audit should take place three years after this audit (ie on or before 12 December 2027).	NA
MP05.0051 MOD2	Environmental monitoring and auditing	3.5B	Independent Environmental Auditing	<p>Within 12 weeks of commencing an audit under condition 3.5A, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.</p>	14.05	<p>The previous audit was conducted on 17 November 2021 and the report was finalised 22 March 2022. The date of the audit report is 4 months and 5 days after the audit was commenced.</p> <p>The previous audit refers to a letter sent to the Department in November 2021 requesting an extension - It has not been established whether that extension request included an extension to the due date for submission, or if another item of correspondence exists.</p>	Non-compliant	NA	Future audit lodgements to be within 12 week period or as otherwise agreed by the Secretary.
MP05.0051 MOD2	Community information, consultation and involvement	4.1		<p>By 30 September 2011, the Proponent must:</p> <p>(a) make copies of the following publicly available on its website:</p> <ul style="list-style-type: none"> ☑ the documents referred to in condition 1.1; ☑ all relevant statutory approvals for the project; ☑ all approved strategies, plans and programs required under the conditions of this approval; ☑ a comprehensive summary of the monitoring results for the project; ☑ a complaints register, which is to be updated on a quarterly basis; ☑ the Annual Review reports required under this approval (over the last 5 years); ☑ any independent environmental audit of the project, and the Proponent's response to any recommendations in any audit; and ☑ any other matter required by the Secretary; and <p>(b) keep this information up-to-date, to the satisfaction of the Secretary.</p>	14.06	The webpage was inspected and found to provide the required information.	Compliant	NA	NA
MP05.0051 MOD2	Community information, consultation and involvement	4.2	Complaints Procedure	<p>Prior to the commencement of construction of the project, the Proponent must ensure that the following are available for community complainants for the life of the project (including construction and operation):</p> <p>a) a telephone number on which complaints about construction and operational activities at the site may be registered;</p> <p>b) a postal address to which written complaints may be sent; and</p> <p>c) an email address to which electronic complaints may be transmitted.</p> <p>The telephone number, the postal address and the email address must be displayed on a sign near the entrance to the site, in a position that is clearly visible to the public, and which clearly indicates the purposes of the sign.</p>	3.04, 9.01, 9.02, 9.03, 9.04, 14.06	Details for registering complaints are available on the website. These details are also provided on signage at the site, confirmed during the site inspection.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Community information, consultation and involvement	4.3	Complaints Procedure	<p>The Proponent must record details of all complaints received through the means listed under condition 4.2 of this approval in an up-to-date Complaints Register. The Register must record, but not necessarily be limited to:</p> <p>a) the date and time, where relevant, of the complaint;</p> <p>b) the means by which the complaint was made (telephone, mail or email);</p> <p>c) any personal details of the complainant that were provided, or if no details were provided, a note to that effect;</p> <p>d) the nature of the complaint;</p> <p>e) any action(s) taken by the Proponent in relation to the complaint, including any follow up contact with the complainant; and</p> <p>f) if no action was taken by the Proponent in relation to the complaint, the reason(s) why no action was taken.</p> <p>The Complaints Register must be made available for inspection by the Secretary upon request.</p>	3.04, 9.01, 9.02, 9.03, 9.04	<p>A software program (INX) has been established to record incidents and events that may occur, this includes provision to collect and manage complaints registered by members of the public.</p> <p>A complaint register is maintained and publically available. No complaints have been received during the audit period.</p>	Compliant	NA	NA
MP05.0051 MOD2	Community information, consultation and involvement	4.4	Community Communication Strategy	<p>Prior to the commencement of any works associated with the project at the site, the Proponent must prepare a Community Communication Strategy for the project. This strategy must be designed to enable the Proponent to respond to any enquiries from the local community and/or adjoining landowners and to provide mechanisms to inform the local community and adjoining landowners as to the operational environmental performance of the facility. The Strategy must include, but does not necessarily be limited to:</p> <p>a) mechanisms through which the Proponent can report to the local community and adjoining landowners on the operations of the project and its environmental performance;</p> <p>b) mechanisms through which the community and/or adjoining landowners can provide feedback to the Proponent in relation to the environmental management of the project; and</p> <p>c) mechanisms through which the Proponent can respond to any enquiries or feedback from the community and/or adjoining landowners in relation to the environmental performance of operations at the project.</p> <p>The Strategy must be approved by the Secretary prior to the commencement of construction of the project. The Proponent must implement the management strategy as approved from time to time by the Secretary.</p>	14.04	<p>Community Consultation Strategy prepared by SKM (Version 0 September 2011 and Final Version 1 - June 2012), this strategy covers all elements of this criterion.</p> <p>Evidence verified during 2018 Holcim IEA - Letter from the Department of Planning and Infrastructure (6 September 2011), providing approval for the Version 0 Community Communications Strategy.</p> <p>There is no requirement to update this strategy in subsequent years. However, the Proponent could consider bringing in relevant elements to future OEMP updates.</p> <p>This action is closed out and not triggered in this audit period.</p>	Not triggered	NA	NA
MP05.0051 MOD2	Environmental Management	5.1	Environmental Representative	<p>Prior to the commencement of site preparation works, the Proponent must nominate a suitably qualified and experienced Environmental Representative(s) whose appointment is to receive prior approval of the Secretary. The Proponent must employ the Environmental Representative(s) on a full-time basis, or as otherwise agreed by the Secretary, during the operations at the site. The Environmental Representative must be:</p> <p>a) the primary contact point in relation to the environmental performance of the project;</p> <p>b) responsible for all Management Plans and Monitoring Programs required under this approval;</p> <p>c) responsible for considering and advising on matters specified in the conditions of this approval, and all other licences and approvals related to the environmental performance and impacts of the project;</p> <p>d) responsible for receiving and responding to complaints in accordance with condition 4.2 of this approval; and</p> <p>e) given the authority and independence to require reasonable steps be taken to avoid or minimise unintended or adverse environmental impacts, and failing the effectiveness of such steps, to direct that relevant actions be ceased immediately should an adverse impact on the environment be likely to occur.</p> <p>The Proponent must notify the Secretary of any changes to that appointment that may occur from time to time.</p>	4.01, 4.02	Environmental representatives have been nominated to the Department and acknowledgement received. The representatives nominated remain the representatives at the date of the audit.	Compliant	NA	NA
MP05.0051 MOD2	Environmental Management	5.2	Construction Environmental Management Plan	<p>The Proponent must prepare a Construction Environmental Management Plan to outline environmental management practices and procedures to be followed during the site preparation and construction activities during each stage of the project. The Plan must be consistent with the Department's Guideline for the Preparation of Environmental Management Plans (DIPNR 2004) and must include, but not necessarily be limited to:</p> <p>a) the Management Plans listed under condition 5.3 of this approval;</p> <p>b) the environmental management and mitigation measures outlined in the documents referenced in condition 1.1; and</p> <p>c) complaints handling procedures during construction.</p> <p>The Plan must be approved by the Secretary prior to the commencement of any site preparation and construction works associated with the project subject to this approval, or within such period otherwise agreed by the Secretary. Construction works associated with any stage of the project subject to this approval must not commence until written approval has been received from the Secretary for that stage. The Proponent must implement the management plan as approved from time to time by the Secretary.</p>	3.04	<p>Previously, non-compliances were raised in relation to lack of evidence of CEMPs for activities (i.e. CBP construction). Any previous non compliances are taken to be closed.</p> <p>No construction was conducted during this audit period and therefore this condition has not been triggered for the purposes of this audit.</p>	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Environmental Management	5.3	Construction Environmental Management Plan	<p>As part of the Construction Environmental Management Plan for the project, required under condition 5.2 of this approval, the Proponent must prepare, the following Management Plans:</p> <p>a) a Soil and Water Management Plan to detail measures to minimise dust, erosion and the discharge of sediment and other pollutants to lands and/or waters during construction works associated with the project. The Plan must be prepared in accordance with Landcom's Managing Urban Stormwater: Soils and Construction.</p> <p>b) a Noise Management Plan to detail measures to minimise noise generated during construction activities associated with the project. The Plan must include, but not necessarily be limited to:</p> <p>i) identification of each work area, site compound and access route (both private and public), and the identification of the specific activities that will be carried out and associated noise sources at these sites;</p> <p>ii) identification of all potentially affected sensitive receivers, and the specification of the noise and vibration criteria for the proposed works (as identified in the documentation listed in condition 1.1);</p> <p>iii) demonstration that the construction methods (including construction traffic noise) will meet the objectives of the EA and noise criteria. This must include an analysis of feasible and reasonable noise mitigation measures that can be implemented to reduce construction noise impacts where the objectives are predicted to be exceeded;</p> <p>iv) a detailed description of what actions and measures would be implemented to ensure that these works would comply with the relevant noise and vibration criteria;</p> <p>v) procedures for notifying residents of construction activities that are likely to effect their noise and vibration amenity, as well as procedures for dealing and responding to noise complaints;</p> <p>vi) a description of how the effectiveness of these actions and measures would be monitored during the proposed works, clearly indicating how often this monitoring would be conducted, how the results of this monitoring would be recorded; and</p> <p>vii) if any non-compliance is detected with the criteria in condition 2.3 or the noise mitigation measures described in the Noise Management Plan, a description of what procedures would be</p>	3.04	<p>Previously, non-compliances were raised in relation to lack of evidence of CEMPs for activities (i.e. CBP construction). Any previous non compliances are taken to be closed.</p> <p>No construction was conducted during this audit period and therefore this condition has not been triggered for the purposes of this audit.</p>	Not triggered	NA	NA
MP05.0051 MOD2	Environmental Management	5.4	Operation Environmental Management Plan	<p>The Proponent must prepare an Operation Environmental Management Plan to detail an environmental management framework, practices and procedures to be followed during the operation of the project. The Plan must be consistent with the Department's Guideline for the Preparation of Environmental Management Plans (DIPNR 2004), and must include, but not necessarily be limited to:</p> <p>i) the complaints handling procedures (conditions 4.2 and condition 4.3 of this approval);</p> <p>ii) the environmental mitigation measures outlined in the Environmental Impact Statement (including those outlined in Table 18-1) and supporting information (as referenced in condition 1.1 of this approval);</p> <p>iii) the Monitoring Program listed under condition 3.1 of this approval; and</p> <p>iv) the Management Plans listed under condition 5.5 of this approval.</p> <p>The Plan must be submitted for the approval of the Secretary no later than one month prior to the commencement of operation of the project, or within such period otherwise agreed by the Secretary. Operation must not commence until written approval has been received from the Secretary. Upon receipt of the Secretary's approval of the Plan, the Proponent must provide a copy of the Plan to the EPA and Council as soon as practicable. The Proponent must implement the management plan as approved from time to time by the Secretary.</p>	10.01, 10.02	<p>OEMP dated June 2023 on file. This verrsion of the OEMP (3.3) has been approved by the Department. The OEMP meets the requirements of this condition.</p> <p>Evidence verified during RHDC IEA 2018 - Letter from the DPE (19 October 2015) advising approval of the OEMP which occurred prior to commencement.</p>	Compliant	NA	NA
MP05.0051 MOD2	Environmental Management	5.5	Operation Environmental Management Plan	<p>As part of the Operation Environmental Management Plan for the project, required under condition 5.4 of this approval, the Proponent must prepare the following Management Plans:</p> <p>a) a Noise Management Plan to outline monitoring, management procedures and measures to minimise total operational noise emissions from the project. This plan must include operational noise management, traffic noise management and train noise management. This plan must also</p>	10.01, 10.02	OEMP dated June 2023 on file. This verrsion of the OEMP (3.3) has been approved by the Department. The OEMP meets the requirements of this condition.	Compliant	NA	NA
MP05.0051 MOD2	Environmental Management	5.6	Operation Environmental Management Plan	<p>Within 3 months of the submission of an:</p> <p>(a) incident report under condition 6.1 below;</p> <p>(b) Annual Review under condition 6.3 below;</p> <p>(c) Independent Environmental Audit under condition 3.5 or condition 3.5B above; and</p> <p>(d) any modifications to this consent,the Proponent must review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. The Proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary.</p> <p>Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of</p>	3.04, 10.05, 10.06	<p>There were no incidents during the audit period. There was a previous IEA and several annual reviews in the audit period that triggered this requirement.</p> <p>Anecdotal evidence from Holcim staff indicate that management plans are reviewed for any necessary changes on at least a 6 monthly basis. The audit team was able to obtain documentary evidence for some 6 monthly periods (i.e. July 2024) that were submitted to the Department. The 'Review tracker' sheet was sighted during the audit and this document is used to track reviews as they are conducted, whether revisions are made to management plan(s) or not.</p> <p>There is no requirement to submit to the Department if no revisions are needed, so the Review Tracker is the primary document to</p>	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Environmental Management	5.7	Operation Environmental Management Plan	Where consultation with any public authority is required by the conditions of this consent, the Proponent must: (a) consult with the relevant public authority prior to submitting the required document to the Secretary for approval; (b) submit evidence of this consultation as part of the relevant document; (c) describe how matters raised by the authority have been addressed and any matters not resolved; and (d) include details of any outstanding issues raised by the authority and an explanation of disagreement between any public authority and the Proponent.	10.01, 10.02	There is no requirement within the consent or other approval documents for consultation with public authorities when developing the OEMP.	Compliant	NA	NA
MP05.0051 MOD2	Environmental Management	5.8	Operation Environmental Management Plan	Any reference to a guideline, policy, standard or similar document that must be taken into account, complied with or otherwise applied under any condition of this consent means a reference to that document or any later version or replacement of that document as it existed at the date at which the document must be applied.	NA	Noted	Not triggered	NA	NA
MP05.0051 MOD2	Environmental reporting	6.1	Incident Reporting	The Proponent must notify the EPA and the Secretary of any incident with actual or potential significant adverse off-site impacts on people or the biophysical environment as soon as practicable after the occurrence of the incident ("initial notification"). The Proponent must provide written details ("written report") of the incident to the EPA and the Secretary within seven days of the date on which the incident occurred.	3.04	No incidents have occurred during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Environmental reporting	6.2	Incident Reporting	The Proponent must meet the reasonable requirements of the Secretary to address the cause or impact of any incident, as it relates to this approval, reported in accordance with condition 6.1 of this approval, within such period as the Secretary may require. Note: Condition 6.2 of this approval does not limit or preclude the EPA from requiring any action to address the cause or impact of any incident, in the context of the EPA's statutory role in relation to the project.	3.04	No incidents have occurred during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Environmental reporting	6.3	Annual Performance Reporting	The Proponent must, throughout the life of the project, prepare and submit to the Secretary, an Annual Review. The Annual Review must review the performance of the project against the Operation Environmental Management Plan (refer to condition 5.4 and condition 5.5 of this approval), the conditions of this approval and other licences and approvals relating to the project. The Annual Review must include, but not necessarily be limited to: a) details of compliance with the conditions of this approval; b) a copy of the Complaints Register (refer to condition 4.3 of this approval) for the preceding twelve-month period (exclusive of personal details), and details of how these complaints were address and resolved; c) a comparison of the environmental impacts and performance of the project against the environmental impacts and performance predicted in those documents listed under condition 1.1 of this approval; d) results of all environmental monitoring required under this approval and other approvals, including interpretations and discussion by a suitably qualified person; and e) a list of all occasions in the preceding twelve-month period when environmental performance goals for the project have not been achieved, indicating the reason for failure to meet the goals and the action taken to prevent recurrence of that type of incident.	8.01, 8.02, 8.03	As per DPIE's advice, the Annual Reviews on the calendar year basis. This has been the case with 2022 and 2023 annual reviews, and will be so for 2024.	Compliant	NA	NA
MP05.0051 MOD2	Environmental reporting	6.4	Annual Performance Reporting	The Proponent must submit a copy of the Annual Review to the Secretary, EPA and Council every year, with: i) the first Annual Review to be submitted within twelve months after the commencement of operation of the project; and ii) the second and subsequent Annual Reviews to be submitted concurrently with the EPA's Annual Return. The Proponent must make the Annual Review available to the public for inspection upon request.	8.01, 8.02, 8.03	There is no longer an EPL in force, hence the requirement to submit the annual review at the same time is not possible. Rather the proponent has fallen back on DPIE advice to submit on a calendar year basis, with the report due three months after year end. The 2021, 2022 and 2023 reviews have been sighted on the Company Webpage.	Compliant	NA	NA
MP05.0051 MOD2	Environmental reporting	6.5	Annual Performance Reporting	The Secretary may require the Proponent to address certain matters in relation to the environmental performance of the project in response to review of the Annual Environmental Report in relation to compliance with this approval and any comments received from the EPA and/or Council. Any reasonable action required to be undertaken must be completed within such period as the Secretary may agree.	3.04	There has been no instruction to address any additional matters relating to environmental performance raised during the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	1	Compliance	To carry out the project generally in accordance with the documents listed in condition 1.1	Refer to individual co	Some non compliances identified below. Refer to individual conditions. The development is being carried out generally in accordance with the FIS and Development Layout	Compliant	NA	NA

Source	Schedule or section	Condi on	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Attachment 1 - Statement of commitments	2	Noise	<p>The following noise controls will be implemented for the modified RDC:</p> <ul style="list-style-type: none">☑ all conveyor drives and transfer points will be enclosed (or alternative comparative mitigation);☑ the most eastern side of the truck load-out facility will be enclosed;☑ noise walls will be constructed during the site establishment phase of construction (refer to Figure 6.1 for noise wall locations. Noise wall specifications are outlined in Appendix 2);☑ plant design, specification and implementation of the modified RDC to achieve the relevant noise criteria (refer to Appendix 2);☑ during construction noisy equipment will be situated behind structures that act as barriers or at distance from the noise-sensitive areas, where possible;☑ construction plant and equipment will be maintained in good working order;☑ during construction ‘quiet’ practices will be employed when operating equipment (e.g. unloading of trucks away from noise sensitive areas); and☑ Holcim will liaise with Blacktown City Council and the Western Sydney Parklands Trust regarding the management of construction noise impacts on Nurragingy Reserve. Holcim is committed to achieving the noise mitigation outcomes achieved by the above management controls. As technological advances occur and through implementing operational management controls, Holcim may be able to achieve the same noise mitigation outcomes through alternative means. Holcim may therefore modify the above management controls in response to these technological advances or operational controls, provided that the same overall noise management outcomes are achieved.	7.01, 7.02	<p>Regular Noise Monitoring Assessments identified that while the site was audible at some noise monitoring locations in only a few instances, noise emissions generated at the site always remained below relevant criterion at all assessed residential receivers.</p> <p>No construction occurred during the audit period and hence construction related noise controls are not relevant.</p>	Compliant	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	3	Air Quality: Constructio n	<p>Holcim will implement the following controls during construction of the modified RDC to minimise dust emissions associated with the Project:</p> <ul style="list-style-type: none">☑ minimising all disturbed areas and stabilisation by progressive rehabilitation/stabilisation as soon as practicable;☑ clearly identifying and delineating areas required to be disturbed and ensuring that disturbance is limited to those areas;☑ minimising the area of disturbance by restricting vegetation clearing ahead of construction activities;☑ removal of any material which is tracked onto pavement surfaces at the end of each working day;☑ place hardstand material or install rumble grids at site exit points onto public roads to minimise the tracking of soil onto pavement surfaces;☑ all trafficable areas on the site will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dust from the site at all times;☑ vegetation will be established on soil stockpiles if they will be undisturbed for a period longer than three months;☑ topsoil stripping will be undertaken when there is sufficient moisture content in the soil to minimise dust generation;☑ plant and equipment will not be left idling when not in use;☑ restricting or ceasing dust-generating activities on extremely windy or dry days; and☑ ensuring that all equipment used on site will be maintained in good working order and in	3.04, 2.01	No construction occurred in the audit period.	Not triggered	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Attachment 1 - Statement of commitments	4	Air Quality: Operation	Holcim will implement the following controls to minimise dust emissions associated with the operation of the project: ☑ all conveyor transfer points will be enclosed; ☑ conveyors will be covered on at least three sides; ☑ water sprays will be used within the transfer point enclosures, rail unloading facility and in other enclosures as required to further minimise dust; ☑ water spray systems will be installed to service all stockpiles; ☑ the rail unloading facility will be enclosed in a building that is open at each end to allow trains to pass through; ☑ all paved trafficable areas must be swept as required by a permanently stationed street sweeper to minimise dust; ☑ all trafficable areas on the site will be maintained in a condition that will minimise the generation or emission of windblown or traffic generated dust from the site at all times; ☑ plant and equipment will not be left idling when not in use; ☑ the radial stacker and associated stockpiles will have water sprays which will be used when the facility is in operation, including when loading vehicles, as required to suppress dust; ☑ vehicle movements will be confined to designated areas, and vehicles will only travel on sealed roads; heavy vehicles entering and leaving the site that are carrying loads must be covered at all times, except during loading and unloading activities; and ☑ ensuring that all equipment used on site will be maintained in good working order and in accordance with manufacturers specifications to minimise emissions	3.04, 10.01, 2.01	item audit observations indicated measures to minimise dust emissions have been implemented on site: - Conveyor is covered. - Water sprayers provided within all designated areas, - Rail loading facility within an enclosed building, - Sealed surfaces were clean, and a street sweeper is used. - Surface run-off from sealed pavement (trafficable) areas captured and filtered prior to release. - Water sprayers installed at radial stacker and stockpiles and in use for loading. - Vehicle movements confined to designated areas. - Loads observed to be covered upon departure (product enters site by rail). - All plant and equipment appeared to be well maintained and in good working order. Despite some exceedances of dust criteria during the audit period, this condition relates specifically to the implementation of these specific controls, all of which have been implemented.	Compliant	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	5	Ecology	In addition to the existing commitments the following mitigation measures will be implemented to further reduce the impact of the modified RDC: ☑ prior to any clearing operations being undertaken, the limits of clearing will be clearly marked; ☑ native logs and bark removed during construction will be retained and reused in areas of Cumberland Plain Woodland, during regeneration and revegetation to provide sheltering habitat for the Cumberland land snail; ☑ sedimentation and erosion control measures will be put in place and maintained during construction and operation to ensure that soil material does not enter surrounding woodland and waterways; and ☑ the post-construction rehabilitation program will use local native plant species and incorporate a weed control program to prevent the spread of weed species into the surrounding woodland landscape.	3.04	No construction occurred in the audit period.	Not triggered	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	6	Ecology	Holcim will consider the small additional area of Cumberland Plain Woodland to be cleared for the modified RDC when establishing the Ecological Offset for the project as part of the preparation of the Vegetation Management Plan required by Project Approval Condition 2.24.	14.04	Evidence verified during RHDC IEA 2018 - Ecological offset for the project has been negotiated, sighted, letter from Western Sydney Parklands Trust (5 July 2011), reference Yoland Gil, advising acceptance of \$277,350.00 as a compensatory habitat package. Closed out prior to this audit	Not triggered	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	7	Water Resources	All erosion and sediment control measures will be carried out in accordance with relevant guidelines for erosion and sediment control, including Managing Urban Stormwater: Soils and Construction (the Blue Book): ☑ Volume 1 (Landcom, 2004); and ☑ Volume 2D Main road construction (DECC, 2008)	3.04	Operational sediment and erosion controls are appropriate. Observations and water quality information confirm this. No construction occurred in the audit period.	Compliant	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	8	Greenhouse	Holcim will develop and implement an Energy Saving Management Plan (ESMP) as part of the Operation Environmental Management Plan. The ESMP will review energy usage, identify energy savings opportunities, and based on this, will implement viable energy saving measures.	10.01, 10.02	This is included in the OEMP.	Compliant	NA	NA
MP05.0051 MOD2	Attachment 1 - Statement of commitments	9	Visual	The externally visible elements of the on-ground concrete storage bins, the concrete plant silos, concrete batching plant, unloading station and other bulky elements, will be coloured in tones that are sympathetic (i.e. green/brown tones) to the surrounding native vegetation.	2.01, 3.04	Observed to be compliant.	Compliant	NA	NA

Source	Schedule or section	Condition	Title	Requirement	Evidence file reference	Comments	Compliance Status	Observation or Opportunity for Improvement	Recommendation
MP05.0051 MOD2	Attachment 1 - Statement of commitments	10	Hazard	<p>The following control measures will be implemented associated with the development in relation to the high pressure gas pipeline:</p> <p>Technical control measures include:</p> <ul style="list-style-type: none">☑ design of piping and structures in accordance relevant standards;☑ geotechnical assessment to determine soil stability prior to construction activities;☑ use of appropriate equipment to minimise the impact on the pipe in the event of contact; and☑ use of process and design controls including limited excavation depths, buffer distances and designated crossings to limit potential for contact with or overstress of the pipe. <p>Non-technical safeguards and procedures include:</p> <ul style="list-style-type: none">☑ assessment of process designs, site layout and design changes;☑ procedural control including the pipeline owner’s Daily Permit System and site inductions;☑ preparation of operating/construction procedures, including awareness and training;☑ cessation of operations in adverse weather conditions;☑ implementation of site speed limit, driver training, route selection and physical barriers where appropriate;☑ provision of physical controls including fencing of siding during construction;☑ limiting access to authorised personnel only and implementation of security patrol if necessary;☑ appropriate training and supervision of operations; and☑ provision of ongoing maintenance and operation procedures	3.04	The design and installation of the high pressure gas pipeline occurred outside of the audit period. Therefore not triggered in this audit period.	Not triggered	NA	NA

Consultation – Holcim Rooty Hill

Agency	Input
DPHI	No comments were received from DPHI prior to the completion of the audit.
Blacktown City Council	<p>Council had no additional focus areas or matters requiring prioritisation, other than the prescribed Audit Scope and relevant legislative requirements.</p> <p>Council did request confirmation of conditions from a 2 August 2024 letter, however on review it was identified that this was for a neighbouring site and therefore not relevant to the IEA.</p>
NSW EPA	<p>The NSW EPA noted that the EPL for the site had been surrendered in 2020, and that it holds no recent information about its environmental performance. The EPA noted that it generally does not provide input to IEAs, and that we were engaging with Council, who are the appropriate regulatory authority.</p>

Rhys Thompson

From: Blacktown Council <Blacktown.Council@blacktown.nsw.gov.au>
Sent: Friday, 22 November 2024 5:01 PM
To: Rhys Thompson
Subject: Auto Reply

Thank you for your email. We have forwarded it to the appropriate section(s) within Council. In line with our service standards for correspondence, you will receive a reply within 10 working days. If your email was a request for information under the *Government Information (Public Access) Act 2009*, you will receive a reply within 20 working days.

If the matter is urgent, you can contact our Customer service team Monday to Friday by phoning 02 5300 6000 between 8.30 am and 4.30 pm or by visiting us at the Civic Centre on Flushcombe Road, Blacktown between 8.30 am and 4.30 pm.



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Rhys Thompson

From: Rhys Thompson
Sent: Friday, 22 November 2024 5:00 PM
To: DPE PSVC Compliance Mailbox
Subject: Independent Environmental Audit Consultation - MP05_0051-Mod2
Attachments: Appointment of Experts_20112024_053340.pdf

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Rooty Hill Distribution Centre (MP05_0051-Mod2).

Our site inspection for this audit is scheduled for Thursday 12 December 2024.

In accordance with the 2020 *Independent Audit – Post Approval Requirements* (IAPAR), we are approaching you to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit. Your input and guidance would be greatly appreciated in ensuring that all relevant compliance aspects associated with the project are thoroughly assessed.

At present, we intend to undertake consultation with the following parties:

- Department of Planning, Housing and Infrastructure (DPHI) – this email
- The NSW Environment Protection Authority (EPA)
- Blacktown City Council

If there are any parties or agencies further to the above that you suggest we should engage with, please let us know.

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP

General Manager



📞 0481 982 049
✉ rhys@4pillars.com.au
🌐 www.4Pillars.com.au
📍 Level 1, 5 George Street
North Strathfield NSW 2137



Rhys Thompson

From: Environment Line <info@environment.nsw.gov.au>
Sent: Friday, 22 November 2024 5:01 PM
To: Rhys Thompson
Subject: Thank you for your email. Your Reference Id is 01208985 (ref:!00D7F06iTix.!500Mn0aY6ZK:ref)



Planning,
Industry &
Environment



Thank you for your enquiry. Environment Line will process your request within 5 working days. If your matter is urgent, please call Environment Line on 131555. For enquiries or requests that are more involved or technical, a longer response time may be necessary. If you have not already visited our websites and wish to do so, please go to www.environment.nsw.gov.au or www.epa.nsw.gov.au

If you are emailing to report an urgent pollution incident, please call 131 555 (press option 1).

Where the EPA or DPE is not the appropriate authority to manage your report, it will be forwarded to the appropriate authority. For example, commercial noise complaints for smaller factories, backyard workshops, smoke from residential backyard fires or chimneys or dumping in public areas are the responsibility of Local Councils; loud music or patron noise from public venues are the responsibility of Liquor & Gaming NSW, rubbish on major roads and highways is the responsibility of Transport for NSW. Any information provided regarding this type of pollution will be forwarded to those authorities for action.

If you do not consent to your report being forwarded, please reply to this email to advise that you would like to 'opt out' of any further action. You may also request that your details remain anonymous or confidential, however in certain circumstances this may limit our ability to deal with any complaint further. Details of our Privacy information can be found [here](#).

When sending further emails about this topic (Independent Environmental Audit Consultation - Rooty Hill Distribution Centre), please ensure the following extended Reference Id appears anywhere in the email subject or body:

ref:!00D7F06iTix.!500Mn0aY6ZK:ref



Rhys Thompson

From: Grace White <grace.white@epa.nsw.gov.au>
Sent: Thursday, 12 December 2024 11:30 AM
To: Rhys Thompson
Subject: RE: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

Follow Up Flag: Follow up
Flag Status: Flagged

Dear Mr Thompson,

I refer to your email to the Environment Protection Authority (EPA) on 22 November 2024 seeking feedback on the environmental performance of the Rooty Hill Distribution Centre at 21 Kellogg Road Rooty Hill (the premises) for the purpose of an independent environmental audit (IEA).

Please note for your records, the Environment Protection Licence No 20672 (the licence) issued to Holcim (Australia) Pty Ltd under the Protection of the Environment Operations Act 1997 (the Act) for a scheduled activity at the premises was surrendered on 18 June 2020. As the premises is no longer licensed by the EPA, the EPA holds no recent information about its environmental performance.

Whilst the EPA encourages independent audit towards proponents improving their environmental performance, the EPA generally does not provide input to IEAs as its role is to set environmental objectives for environmental/conservation management and management outcomes.

The EPA notes that you are engaging with Blacktown City Council, the appropriate regulatory authority for this site, regarding the premises' environmental performance.

If you wish to discuss the matter further, please contact me on 8275 1189.

Kind regards,

Grace White

Operations Officer - Operations
NSW Environment Protection Authority
D 02 8275 1189 | M 0467 281 443

www.epa.nsw.gov.au

Working days: Monday to Friday

Join us on our mission to
protect tomorrow together.



The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

----- Forwarded Message -----

From: Rhys Thompson [rhys@4pillars.com.au]

Sent: 22/11/2024 5:00 PM

To: info@epa.nsw.gov.au

Subject: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Rooty Hill Distribution Centre at 21 Kellogg Road Rooty Hill (MP05_0051-Mod2), with a site inspection scheduled for Thursday 12 December 2024.

Accordingly, we are approaching the EPA to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

1. Department of Planning, Housing and Infrastructure (DPHI)
2. The NSW Environment Protection Authority (EPA) – this email
3. Blacktown City Council – this email

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP

General Manager



☎ 0481 982 049
✉ rhys@4pillars.com.au
🌐 www.4Pillars.com.au
📍 Level 1, 5 George Street
North Strathfield NSW 2137



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ref:!00D7F06iTix.!500Mn0aY6ZK:ref

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PLEASE CONSIDER THE ENVIRONMENT BEFORE PRINTING THIS EMAIL

Rhys Thompson

From: Yael Lang <Yael.Lang@blacktown.nsw.gov.au>
Sent: Thursday, 5 December 2024 1:44 PM
To: Rhys Thompson
Subject: RE: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

Follow Up Flag: Follow up
Flag Status: Flagged

Hello Rhys,

Thank you for your email providing Council an opportunity to comment on the upcoming Independent Environmental Audit (IEA) for the Holcim site at 21 Kellogg Road, Rooty Hill.

I have no additional focus areas or matters requiring prioritisation, other than the prescribed Audit Scope and relevant legislative requirements.

If you wish to discuss, please contact me.

Regards,



Yael Lang (She/her)
Environmental Scientist

9839 6352 | 0438 972 918
PO Box 63 Blacktown NSW 2148
blacktown.nsw.gov.au

**We acknowledge the Dharug as the
First People of the Blacktown City region**

Follow us on social media

From: Rhys Thompson <Rhys@4pillars.com.au>
Sent: Friday, 22 November 2024 5:01 PM
To: Blacktown Council <Blacktown.Council@blacktown.nsw.gov.au>
Subject: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Rooty Hill Distribution Centre at 21 Kellogg Road Rooty Hill (MP05_0051-Mod2), with a site inspection scheduled for Thursday 12 December 2024.

Accordingly, we are approaching Blacktown City Council to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

- Department of Planning, Housing and Infrastructure (DPHI)
- The NSW Environment Protection Authority (EPA)
- Blacktown City Council – this email

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP

General Manager



0481 982 049
rhys@4pillars.com.au
www.4Pillars.com.au
Level 1, 5 George Street
North Strathfield NSW 2137



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Rhys Thompson

From: Sami Ahangari <Sami.Ahangari@blacktown.nsw.gov.au>
Sent: Wednesday, 11 December 2024 5:28 PM
To: Rhys Thompson
Subject: RE: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre
Attachments: Final Blacktown City Council comments 2 August 2024 - DA11-94-MOD-8.PDF

Hi Rhys,

Further to Yael's email below, we also request that our conditions as per the attached letter dated 2 August 2024 be noted and adhered to.

Please do not hesitate to contact me if you have any further enquiry.

Regards



Sami Ahangari
Coordinator Planning Assessment

9839 6213
PO Box 63 Blacktown NSW 2148
blacktown.nsw.gov.au

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First People of the Blacktown City region**

Follow us on social media

From: Yael Lang
Sent: Thursday, 5 December 2024 1:44 PM
To: Rhys Thompson <Rhys@4pillars.com.au>
Subject: RE: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

Hello Rhys,

Thank you for your email providing Council an opportunity to comment on the upcoming Independent Environmental Audit (IEA) for the Holcim site at 21 Kellogg Road, Rooty Hill.

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If you wish to discuss, please contact me.

Regards,



Yael Lang (She/her)
Environmental Scientist

9839 6352 | 0438 972 918
PO Box 63 Blacktown NSW 2148
blacktown.nsw.gov.au

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From: Rhys Thompson <Rhys@4pillars.com.au>

Sent: Friday, 22 November 2024 5:01 PM

To: Blacktown Council <Blacktown.Council@blacktown.nsw.gov.au>

Subject: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

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As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Rooty Hill Distribution Centre at 21 Kellogg Road Rooty Hill (MP05_0051-Mod2), with a site inspection scheduled for Thursday 12 December 2024.

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- Department of Planning, Housing and Infrastructure (DPHI)
- The NSW Environment Protection Authority (EPA)
- Blacktown City Council – this email

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP
General Manager



0481 982 049
rhys@4pillars.com.au
www.4Pillars.com.au
Level 1, 5 George Street
North Strathfield NSW 2137



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Your ref: DA11/94-MOD-8
File no: MC-05-03347

NSW Department of Planning and Employment
GPO Box 39
Sydney NSW 2001
Laura.evert@dpie.nsw.gov.au

2 August 2024

Attention: Laura Evert

Dear Laura Evert,

DA11/94-MOD-8: Installation of Static Synchronous Compensator (STATCOM) equipment – 22 Kellogg Road, Rooty Hill

Thank you for your correspondence dated 22 July 2024 requesting Council's comment for the installation of Static Synchronous Compensator (STATCOM) equipment under Modification 8 to the State Significant Development DA11/94.

The Modification report has been carefully reviewed by our officers and Council raises no objection to the development, subject to the conditions in Attachment A to this letter being imposed as conditions of any development consent granted.

If you would like to discuss this matter further, please contact our Town Planner, Jude Urbanik on 5300 6000.

Yours faithfully,



Judith Portelli
Manager Development Assessment

DA11/94-MOD-8: Installation of Static Synchronous Compensator (STATCOM) equipment – 22 Kellogg Road, Rooty Hill

1. Recommended Conditions of Consent

Prior to Construction Certificate

- a) The applicant is to obtain a Building Information Certificate (BIC) under Division 6.7 of the Environmental Planning and Assessment Act 1979 regarding the portable office building constructed adjacent to the development. The application must include an identification survey prepared by a registered surveyor and as-built plans identifying the unauthorised building/structure.
- b) A site-specific 'Unexpected Finds Protocol' is to be prepared, implemented, and made available for reference for all occupants and/or site workers in the event unanticipated contamination is discovered, including asbestos.
- c) The applicant shall retire the class and number of ecosystem credits in Table 1 to offset the impacts of the development. The requirement to retire credits outlined in Table 1 may be satisfied by payment to the Biodiversity Conservation Trust of an amount equivalent to the class and number of ecosystem credits, as calculated by the Biodiversity Offsets Payment Calculator.

A link to the Biodiversity Conservation Trust website, for directions on payment can be found at [Pay into the fund to offset development | BCT \(nsw.gov.au\)](https://www.bct.nsw.gov.au/pay-into-the-fund-to-offset-development). You can also contact the BCT on 1300 992 688 or info@bct.nsw.gov.au.

Evidence of the retirement of credits or payment to the Biodiversity Conservation Trust in satisfaction of Table 1 requirements shall be provided to Council prior to release of (select: construction certificate/ subdivision certificate).

Table 1: Ecosystem credits required to be retired - like for like:

Impacted plant community type (PCT)	Number of ecosystem credits	Containing HBT	IBRA sub-region	Plant community type(s) that can be used to offset the impacts from development
3320 Cumberland Shale Plains Woodland	1	Yes	Cumberland, Burraborang, Pittwater, Sydney Cataract, Wollemi and Yengo. or Any IBRA subregion that is within 100 kilometers of the outer edge of the impacted site.	Cumberland Plain Woodland in the Sydney Basin Bioregion This includes PCT's: 3319, 3320

- d) Prior to any works commencing on site temporary Bushland Protection Fencing must be in place at the southwestern car park perimeter to the Biodiversity Values mapped area.

The fence is to restrict unauthorised entry and prevent the following within the bushland biodiversity mapped zone:

- Stockpiling of materials;
- Placement of fill;
- Parking of vehicles;
- Compaction of soil;
- Earthworks incursions;
- Cement washout and other chemical or fuel contaminants; and
- Damage to threatened species and their habitats

During Demolition, Construction, and Site Works

- a) All erosion and sediment controls shall be appropriately managed throughout the development to prevent pollution until the land is considered erosion resistant.

Operational

- a) No contaminated wastewater or liquid waste shall be discharged into Council's stormwater system.
- b) Upon receipt of a justified complaint in relation to noise pollution emanating from the premises, an acoustical assessment is to be carried out in accordance with the requirements of the Department of Environment and Conservation's Environmental Noise Management - NSW Industrial Noise Policy and provide recommendations to mitigate the emission of offensive noise from the premises. The report shall be prepared by an appropriately qualified acoustic consultant that is a member of the Association of Australian Acoustic Consultants and shall be submitted to Council for consideration.
- c) Any activity carried out in accordance with this approval shall not give rise to air pollution (including odour), offensive noise or pollution of land and/or water as defined by the Protection of the Environment Operations Act 1997.
- d) All waste generated on the site is to be stored, handled, and disposed of in such a manner as to not create air pollution (including odour), offensive noise or pollution of land and/or water as defined by the Protection of the Environment Operations Act 1997.
- e) In accordance with the requirements of Part 5.7 Protection of the Environment Operations Act 1997, Council is to be informed of any pollution incident that occurs in the course of carrying out the approved activity where material harm to the environment is caused or threatened.

Rhys Thompson

From: Grace White <grace.white@epa.nsw.gov.au>
Sent: Thursday, 12 December 2024 11:30 AM
To: Rhys Thompson
Subject: RE: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

Follow Up Flag: Follow up
Flag Status: Completed

Dear Mr Thompson,

I refer to your email to the Environment Protection Authority (EPA) on 22 November 2024 seeking feedback on the environmental performance of the Rooty Hill Distribution Centre at 21 Kellogg Road Rooty Hill (the premises) for the purpose of an independent environmental audit (IEA).

Please note for your records, the Environment Protection Licence No 20672 (the licence) issued to Holcim (Australia) Pty Ltd under the Protection of the Environment Operations Act 1997 (the Act) for a scheduled activity at the premises was surrendered on 18 June 2020. As the premises is no longer licensed by the EPA, the EPA holds no recent information about its environmental performance.

Whilst the EPA encourages independent audit towards proponents improving their environmental performance, the EPA generally does not provide input to IEAs as its role is to set environmental objectives for environmental/conservation management and management outcomes.

The EPA notes that you are engaging with Blacktown City Council, the appropriate regulatory authority for this site, regarding the premises' environmental performance.

If you wish to discuss the matter further, please contact me on 8275 1189.

Kind regards,

Grace White

Operations Officer - Operations
NSW Environment Protection Authority
D 02 8275 1189 | M 0467 281 443

www.epa.nsw.gov.au

Working days: Monday to Friday

Join us on our mission to
protect tomorrow together.



The EPA acknowledges the traditional custodians of the land and waters where we work. As part of the world's oldest surviving culture, we pay our respect to Aboriginal elders past, present and emerging.

----- Forwarded Message -----

From: Rhys Thompson [rhys@4pillars.com.au]

Sent: 22/11/2024 5:00 PM

To: info@epa.nsw.gov.au

Subject: Independent Environmental Audit Consultation - Rooty Hill Distribution Centre

To whom it may concern,

As per the attached, we have been engaged to conduct an Independent Environmental Audit (IEA) of the Rooty Hill Distribution Centre at 21 Kellogg Road Rooty Hill (MP05_0051-Mod2), with a site inspection scheduled for Thursday 12 December 2024.

Accordingly, we are approaching the EPA to understand whether there are any specific aspects or key focus areas that you would like us to prioritise or assess further during this audit.

At present, we intend to undertake consultation with the following parties, and have requested that DPHI inform us of any further suggested consultation:

1. Department of Planning, Housing and Infrastructure (DPHI)
2. The NSW Environment Protection Authority (EPA) – this email
3. Blacktown City Council – this email

We thank you in advance for your assistance and look forward to your response. If any further information is required, please do not hesitate to contact me via my details, below.

Best Regards,

Rhys Thompson CEnvP

General Manager



☎ 0481 982 049
✉ rhys@4pillars.com.au
🌐 www.4Pillars.com.au
📍 Level 1, 5 George Street
North Strathfield NSW 2137



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ref:!00D7F06iTix.!500Mn0aY6ZK:ref

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Appendix 7 Documentary Evidence File

NOTE: We acknowledge the Department's preference regarding the presentation of evidence in audit tables – that relevant items of evidence are named in full in each row against the relevant condition. 4Pillars has taken a slightly different approach in this report – an index of evidence has been created and references in the audit table are to the Exhibit ID. The benefits in doing this are: no risk of typos/errors where the same piece of evidence is referred to in multiple conditions, creation of a data file for the audit that can be used as a point of reference in the future and improved legibility of the audit table. However, if DPHI is not satisfied with this presentation of the data in the audit table, we will gladly amend the audit table and we welcome DPHI feedback on that point.

This is a decision that has been taken by 4Pillars and is not a decision of the Proponent. The Lead Auditor has noted DPHI's preference and 4Pillars has requested the opportunity to trial this approach and gauge DPHI's position on it. We found it to be a very helpful approach from an audit process perspective and we believe it greatly reduces the risk of transcription error and ultimately improves the precision of this audit report and the information available for DPHI to use for verification purposes.

The evidence file

The Evidence File is provided as a OneDrive folder. Specific recipients have been provided access to this folder. Other recipients can be added on request. Please contact hello@4Pillars.com.au or visit www.4Pillars.com.au for alternative contact details.

Evidence File Link: [CLICK HERE](#)

INDEX TABLE

Exhibit ID	Description
1.00	Photographs from site inspection - all dated 12 December 2024
1.01	Overview of the Site looking north from the conveyor
1.02	View north east from the southern bays, showing water suppression tank and conveyor
1.03	View north east overlooking stockpiles in main storage area
1.04	Covered conveyor leading from the rail siding to the southern bays
1.05	Outside the rail siding facility looking west
1.06	Inside the rail siding facility showing gate on the floor leading to conveyor below
1.07	Dust sentry unit installed alongside old (not operational) High Vol PM sampler
1.08	View over Angus creek from the bridge
1.09	Humes stormceptor unit - one of several in line water quality controls on the Site
1.10	Water cart operating during the site inspection
1.11	Truck refuelling area showing isolated runoff area, spill kits, sump etc
1.12	Closer photo of the diesel tank (refuelling area)
1.13	Spill kit next to diesel tank and air compressor on the CPB Site.
1.14	Portable bund containing IBCs of non DG additives on the CPB Site. This is a temporary storage area and the bund is reinstated once IBC movements are finished
1.15	Southern bays at the CBP site, looking north
1.16	Washout bay water recirculation system and bunded and secured additive tanks.
1.17	Dust sentry unit installed alongside old (not operational) High Vol PM sampler - Site Office
1.18	Stocked spill kit inside workshop
1.19	Liquid storage on bund within workshop
1.20	Flame store and small liquid/chemical containers on bund in workshop
2.00	Surveys, maps and site plans
2.01	Nearmap aerial imagery of the site for 2022, 2023 and 2024
3.00	Records, inspections, operational data
3.01	RHDC Aggregate production register - 2022, 2023 and 2024. Figures in tonnes
3.02	CPB concrete production register - 2022, 2023 and 2024. Figures in M3
3.03	Delivered material via rail to the Site - 2022, 2023 and 2024. Figures in tonnes

3.04	Observations, Interview Notes and anecdotal evidence provided during Site Inspection 12 December 2024
4.00	Correspondence with regulatory agencies
4.01	Notification the DPHI on the appointment of environmental representatives for Holcim Rooty Hill Distribution centre, dated 16 November 2024
4.02	Response from DPHI accepting the nomination of representatives in letter dated 16 November 2024
5.00	Not used
6.00	Planning agreements, legal instruments and contracts
7.00	Environmental Monitoring Reports and Data
7.01	RHDC Annual noise monitoring assessment, Ramboll, dated July 2024.
7.02	RHDC Annual noise monitoring assessment, Muller Acoustic, dated February 2022.
7.03	Dust Sentry data - Site office - 2023 and 2024 since installation
7.04	Dust Sentry data - Rail - 2023 and 2024 since installation
7.05	Review of air quality approval conditions and monitoring program at Rooty Hill Regional Distribution Centre to advise on an appropriate program
7.06	DPHI correspondence (dated 17/6/2024) responding to Proponent's 17 June 2024 notification of anomaly in air quality dataset
7.07	Toolijooa Environmental Restoration - Bushland Regeneration Report January 2021 to February 2022.
7.08	Toolijooa Environmental Restoration - Bushland Regeneration Report January 2022 to December 2022.
7.09	Aquatic monitoring report Summer February 2024
7.10	Aquatic monitoring report Autumn May 2024
7.11	Aquatic monitoring report December 2024
7.12	Aquatic monitoring report July 2024
8.00	Reports to regulatory authorities
8.01	2021 Annual Review
8.02	2022 Annual Review
8.03	2023 Annual Review
9.00	Complaints and stakeholder management
9.01	Complaints register 2021
9.02	Complaints register 2022
9.03	Complaints register 2023
9.04	Complaints register 2024
10.00	Management Plans
10.01	Operational Environmental Management Plan V3.3 dated June 2023.
10.02	DPHI approval of Operational Environmental Management Plan v3.3 dated June 2023. DPHI approval letter dated 26/9/2023
10.03	Not used
10.04	DPHI approval of Operational Environmental Management Plan v3.2 dated January 2022. DPHI approval letter dated 27/01/2022
10.05	DPHI correspondence acknowledging a Condition 5.6 notification of review for the RHDC OEMP. Dated 16 June 2024.
10.06	Letter to DPHI confirming review of the RHDC OEMP following the 2022 Annual Review. Dated 30/6/2023
11.00	Penalties, Fines or Notices
12.00	Environmental Impact Assessment documents
13.00	Not used
14.00	Miscellaneous documents
14.01	Final Occupation Certificate for CBP, Essential Certifiers, dated 30/9/2019
14.02	Excerpt of the Premises page in the POEO Public Register. Obtained 5 March 2025.
14.03	Surrender of EPL Notice
14.04	2017 IEA
14.05	2021 IEA
14.06	Proponent's webpage, accessed 5 March 2025
15.00	Not used