INDEPENDENT ENVIRONMENTAL AUDIT 2026
HODGSON QUARRIES AND PLANT PTY LTD, ROBERTS ROAD MAROOTA, NSW 2756
DEVELOPMENT CONSENT DA 267-11-99 MOD 4

Organisation Audited:	Hodgson Quarries and Plant Pty Ltd
Auditor:	Kieran Horkan Lead Auditor Organized Rhyme Environmental Consultancy
Draft Report Submitted	May 2026
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ABBREVIATIONS

AQMP	Air Quality Management Plan
AS	Australian Standard
BOM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
CCG	Community Consultation Group
Council	The Hills Shire Council
DA	Development Approval
DDG	Deposition Dust Gauge
DPIE	Department of Planning, Industry and Environment
DUAP	Department of Urban Affairs and Planning
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EMP	Environment Management Plan
ENM	Excavated Natural Material
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EPL	Environment Protection Authority
FFMP	Flora and Fauna Management Plan
GMP	Groundwater Management Plan
IEA	Independent Environmental Audit
LRMP	Landscape and Rehabilitation Management Plan
MEG	Mining, Exploration and Geosciences
MOD4	Modification 4 of DA 267-11-99
NC	Non-compliance
NRAR	Natural Resource Access Regulator
OEMP	Operational Environment Management Plan
OREC	Organized Rhyme Environmental Consultancy
ORNMP	Operational and Road Management Plan
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
QCM	Quarry Compliance Manager
SWWMP	Surface Water Management Plan
The Department	Department of Planning, Housing and Infrastructure
TMP	Traffic Management Plan
TSP	Total Suspended Particulates
TSS	Total Suspended Solids
VENM	Virgin Excavated Natural Material
WAL	Water Access Licence

EXECUTIVE SUMMARY

Organized Rhyme Environmental Consultancy (OREC) was engaged by Hodgson Quarries and Plant Pty Ltd (the Quarry), to undertake an Independent Environmental Audit (EIA) of their quarry at Roberts Road, Maroota, NSW 2756. This EIA is required to be undertaken every three years and the previous one was conducted in 2023. The IEA has been prepared to meet the requirements of Conditions 70 and 71 of DA 267-11-99 Modification 4 and the *Independent Audit – Post-Approval Requirements 2020 (NSW Department of Planning, Industry and Environment (DPIE)).* The IEA covers the reporting period from 5 May 2023, the date when the Final Report of the previous Audit was submitted to the Department until xx May 2026. This is the fifth IEA issued for the Quarry.

The lead Auditor, Kieran Horkan, Scientific Director of Organised Rhyme Environmental Consultancy (OREC) was approved by *the Department of Planning, Housing and Infrastructure* (the Department). The site Audit and meetings was undertaken on 26 March 2026 was undertaken by the Auditor and Stuart Reed, Quarry Compliance Manager.

The Audit included an Assessment of compliance with the four development consent modifications of DA 267-11-99.

- Modification 1: Approved 29 November 2000, seeking approvals to amend method of extraction and to construct an acoustic bund wall.
- Modification 2: Approved 18 March 2016, seeking approval to amend the dam construction process from two to three stages, modify the sequence and process of extraction and extend extraction until 2025.
- Modification 3: Approved 18 August 2015, seeking approval to extent the life of operations for one year.
- Modification 4 was approved on 21 August 2021, seeking approval to extend the life of the quarry to 2030, increase truck movements and allowing the importation of VENM and ENM to rehabilitate the site.
-

No further modifications were made after MOD 4.

The Audit included a comprehensive review of the last two Audits (2020 and 2023), other reports, EMP's, Annual Reports, Management Plans, Monitoring Reports, compliance with EPA licence conditions and likewise with water licence conditions.

A small number of non-compliances 3 in the DC and none EPA's Environmental Protection Licence (EPL) or the Water Access Licence (WAL), were found with issues of a relatively minor nature. An initial concern about the cluttered nature of the storage shed where an empty oil drum was seen to be outside the bunded area however, all full oil drums were within the bunds. In addition, paperwork was sighted confirming that a drum reconditioner company actually removes and recycles such containers. Therefore, this observation was considered compliant.

One observation of concern is the increased risk of significant erosion or landslide from the steep quarry walls following heavy rainfall events, which appear to be increasing in frequency and intensity. However, the quarry has three well established procedures (Workplace Environmental Stability Checklist monthly, the Checklist is also undertaken immediately an alarm is sent warning of inclement weather and a Risk Management Plan, including Hazard Management Plan, Ground

Strata Failure Slope Stability), for managing the potential for such events which is reassuring to the Auditor is that this potential issue is being well managed by the Quarry.

In general, the environmental performance of the quarry is good and the quarry operation continues without any complaints from the local community.

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1. INTRODUCTION

The Roberts Road sand quarry at Maroota is operating under the name Hodgson Quarries and Plant Pty Ltd (the Quarry). The Quarry extracts high quality sand from the rich geological formation which lies on the Hornsby Plateau, north-west of Sydney in the Hills Shire Council LGA (Council). The Quarry operates under a NSW Environment Protection Authority (EPA) environment protection licence # 6535 (EPL). The original development approval was approved by the Department of Urban Affairs and Planning (DUAP) in 2000 as DA 267-11-99. Since then, there have been a few further modifications to the approval which are listed below: -

- MOD 1: Approved 29 November 2000, approval to amend the extraction method and to construct an acoustic bund wall.
- MOD 2: Approved 18 March 2016, approval to amend the dam construction process from two to three stages; modify the sequence and process of extraction; extend the life span of the extraction until 2025.
- MOD 3: Approved 18 August 2015, approval to extend the life of the operations for one year.
- MOD 4: Approved 13 August 2021, approval to import VENM/ENM; increase daily truck movements to 140/day; extend the quarry life to 2030.

No further modifications have been made since MOD 4.

The Quarry is subject to an Independent Environmental Audit (IEA) every three years to meet the requirements of Conditions 70 and 71 of DA 267-11-99, plus the Independent Audit – Post Approval Requirements, (NSW Department of Planning, Industry and Environment (DPIE), May 2020). The IEA covers the period from the initial site meeting, site visit and wrap-up meetings held on 26 March 2026 until 22 May 2026 but takes into account any findings since the issuing of the Final Report of the previous Audit in May 2023. The lead Auditor, Kieran Horkan, was approved by the Department of Planning, Housing and Infrastructure (the Department) on 23 February 2026 and appointed by Hodgson Quarries and Plant Pty Ltd to undertake the project (Attachment 1).

1.1 QUARRY OPERATION DETAILS

As mentioned, the project approval number is DA 267-11-99 with its four modifications. The site address is the Corner of Old Northern Road and Roberts Road, Maroota, NSW 2756. The quarry has been in operation since the 1990's, supplying high grade sand and gravel to the building and construction industry. While the most recent planning modification number 4 (MOD 4) has approval for up to 140 truck movements per day (70 in and 70 out), the actual average maximum number of truck movements of only 20 in and out (Annual Report, 2025), is well below predicted maxima.

The extracted sand and gravel go through a washing and separation process using on-site dam water. The raw material is loaded onto a belt feeder, then goes through a mixing tank. Water is pumped to the mixing tank by pipeline making a slurry and is then pumped to the processing plant. The processing plant washes and screens the material mainly using water from Process Dam 1. The cleaned material is then stockpiled nearby ready for transport off-site. Trucks are filled using a front-end loader. The waste slurry from washing and screening is piped to designated drying areas and the recovered water is returned to the dam for reuse in processing. During the site visit it was observed that no process water left the site ensuring that there was no

breach of Section 120 of the Protection *of the Environment Operations Act 1997.* The quarry sits in a natural basin and no overtopping of water occurs even during high intensity rainfall events. Virgin excavated natural material (VENM) and Excavated Natural Material (ENM) are brought by truck to the quarry and pass through the weighbridge before being unloaded in a separate part of the quarry for stockpiling and separating. The quarry uses a small number of trustworthy truck contractors and regular inspections are carried out. Materials such as asbestos are not permitted on-site.

1.2 AUDIT OBJECTIVES

The objective of this triennial Independent Environmental Audit (IEA) is to assess compliance with the conditions of consent number DA 267-11-99 and its modifications as well as compliance with the EPL, Water licence and Council requirements. The Audit follows the directions of the Post Approval Requirements, 2020 of the *Department of Planning, Industry and Environment (DPIE).*

1.3 SCOPE OF AUDIT

The IEA scope was limited to assessing the environmental performance of the company's operations as per DA 267-11-99 and its four modifications with no further modifications were made since MOD 4 in 2021. The main features of the Audit scope are: -

- Checking performance against conditions of all relevant approvals (DA, EPL, Water Licence).
- Reviewing the implementation of the most recent Annual Reports, Environmental Management Plans, Independent Environmental Audits, Compliance Reports, Monitoring Reports on Flora and Fauna Biodiversity, Noise, Water Management, Dust, Air, Climate, Traffic Management, Landscape and Rehabilitation Plans.
- The requirements of all relevant regulatory agencies.
- Consultation with the Department, EPA, Water NSW and Council to get their feedback on plant performance.
- Review of compliance with licence conditions in EPL # 6535.
- Review of requirements of Water Access Licence # 24163.
- The current performance of the operation based on the site inspection, on-site meetings and discussions.
- Results from previous Audits.
- Community complaints, incidents (if any).

This is the fifth IEA since the first one was undertaken in 2014. The current Audit period covers the period from 26 March 2026 until the final report was released on 22 May 2026 and is within the three-year timeframe required by the Department.

2. METHODOLOGY

2.1 APPROVAL OF AUDITOR

Hodgson Quarries and Plant Pty Ltd engaged Kieran Horkan as the Independent Environmental Auditor to conduct the Audit following approval by the Department. The Approval letter can be found in Attachment 1.

The Auditor has a Graduate Diploma in Industrial Microbiology and a B.Sc in Biological Sciences from University College Dublin, Ireland and a M.Sc from the University of Alberta, Canada.

2.2 AUDIT PROCESS

A desktop review of all readily available documents such as licences, reports, relevant correspondence, etc was done. This review greatly assisted the Auditor in his assessment of overall compliance. As further documents and monitoring records were requested these were kindly made available electronically or sometimes in a hard copy by the Quarry Compliance Manager (QCM), Stuart Reed.

Discussions with the QCM set up a date for the required formal site inspection, preceded by an opening meeting and a closing meeting after the walkabout inspection on 26 March 2026.

Audit activities covered the following: -

- A desktop review of the various project documentation which are all readily available on the VGT Environmental Solutions and Laboratories (VGT) website. The review of the reports and documents help to verify compliance with the DA, EPL and WAL licences.
- In addition, a review of the various technical reports on the VGT website were consulted to check for compliance against the monitoring limits as further evidence of compliance.
- The site meeting followed by a site walkabout was undertaken to see first-hand the performance of mitigation measures required in the environmental controls was done on 26 March 2026 with the QCM.
- The site-visit was followed by a short closing meeting. Some additional documentation was identified as being required to fully complete the Audit and these were sent to the Auditor over the following days.
- The Department, the EPA and NSW Water were contacted electronically to check whether there were any issues with the DA, EPL or WAL (Table 2.1).
- Once completed a submission of a Draft Audit Report for review by relevant Senior Hodgson Quarries staff before finalising the report for submission to the Department within the required timeframe.

2.3 AGENCY CONSULTATION

The Auditor corresponded with Planning, Water NSW, EPA and the Hills Shire Council (Council) who were considered the relevant agencies regulating this quarry. EPA and Council responded however while the other agencies acknowledged receipt of the Auditor's email no response was received (Table 2.1).

In addition, the Auditor checked whether there was an active Community Consultation Group (CCG) involved with the quarry and found that there was no communication from any such group although there is a CCG involved with issues at a nearby sand quarry. The lack of community involvement suggests that the communities has no ongoing issues with Hodgsons Quarry at Maroota and this is backed up by the nil input to the Complaints Register year after year.

Table 2.1 Correspondence with Relevant Agencies

CONTACT	AGENCY	FEEDBACK
Customer Service information@planning.nsw.gov.au	Department of Housing, Planning and Infrastructure	No response.
Environment Line info@environment.nsw.gov.au	Environment Protection Authority	EPA does not have any comments to be included in the report.
council@thehills.gov.au	The Hills Shire Council	Council raised the issue of the provision and maintenance of bunding and landscape screening around the site and the visual impact as ongoing.
enquiries@waternsw.gov.au	Water NSW	No response.

2.4 ON-SITE MEETINGS AND AUDIT SITE INSPECTION 26 MARCH 2026

The formal Audit process began on 26 March 2026, with the opening meeting at the quarry beginning at 8.35 am. This meeting with Stuart Reed, Quarry Compliance Manager (QCM) set out the scope, purpose and timeline of the Audit. Mr Reed had been fully involved in previous IEA's as company representative and readily made available key operational documents and reports for review by the Auditor. The Quarry Manager (Martin Hodgson) was not available at the time but was fully informed of the arrangements made and agreed that the meetings and inspections should proceed.

Evidence of compliance was considered by the Auditor during the interview process at the meeting as well as considering the content of the documents mentioned. Access was also given to the storage archive at the VGT website where all relevant documents are kept and contact was made with Lisa Thomson of VGT, which was helpful. This made for easy access for reviewing the documents. Any hard copies of documents that the Auditor requested were made available for review. A discussion was also made of the current status of the non-compliances (NC's) from the previous Audit (2023) and it was found that all 13 NC's have now been resolved, including the last outstanding one, i.e., the issue of a Security Bond, which had now been agreed for a sum of $320K.

Following the opening meeting the site visit was undertaken on foot with Stuart and apart from observations made and questions asked, photographs were also taken and are included in the report (Attachment 2). The site-visit began at the large storage shed (mainly used for fuel but also containing quantities of other essential chemicals and other materials). This shed is located to the left of the front gate adjacent to the car park, near the weighbridge. At the weighbridge we observed a fully loaded truck arriving with ENM and passing all checks to be permitted on-site to unload.

Apart from observing site operations the Auditor asked what changes had taken place in the last three years since the previous Audit. Two changes were mentioned, (1) a new cell was opened up as sand mining progressed and (2) ENM and VENM imports to the site were increased in scale as approved by the EPA in 2025. Of particular interest were the bunds, which were fine and the planted vegetation which was observed to be growing well, although this could be expanded. The site visit looked closely at the implementation of mitigation measures, environmental controls, water management and the quarrying of sand and gravel followed by the washing, cleaning and separation of sand and gravel ready for market. Site safety was also considered and found to meet required standards.

A summary of the issues/observations focussed on during the site visit included the following: -

- Chemical storage and bunding (including in shed bunding of fuel).
- Signage on site.
- Weighbridge and monitoring truck movements.
- Access/egress.
- Roads approaching the site and on-site dust/mud tracking.
- Dust management.
- Erosion and sediment controls in light of increased frequency of major rainfall events.
- Noise from on-site quarrying and truck movements.
- Observance of arrival of ENM on-site and unloading.
- Waste management.
- Rehabilitation area maintenance.
- Vegetation screening and fencing.
- General housekeeping.

At the end of the site walkabout a closing meeting was held and a preliminary discussion of the initial Audit findings made as well as a request for some additional documents. For example, it was established that the approved 140 truck movements/day (70 outbound and 70 inbound as per the *Traffic Management Plan, 2022),* has not been achieved, although this would not be considered a non-compliance.

3. AUDIT FINDINGS

3.1 OVERVIEW

Specific activities and observations at the quarry during the site inspection included: -

- The oil drums that were full were located in the bunds. An oil drum standing on a pallet in an unbunded area was found to be empty, awaiting recycling (Attachment 2, Photo 1). The shed is quite cluttered and would benefit from installing shelves for storing some containers off the ground.
- The quarry has a good recycling system for tyres, metals and oil drums.
- Arrival of a fully loaded (with ENM) B-double truck at the site proceeding to the weighbridge and after being accepted passing through on the quarry road to unload at the designated discharge point.
- General overview of main quarry extraction areas, location of ponds, active quarrying and working areas, finished stockpiles (Attachment 2, Photos 4 – 10).
- Observation of erosion controls, on steep quarry walls and on some areas of the internal roads in the quarry.
- Observation of large diesel tank fuelling working quarrying sorting equipment on-site (Attachment 2, Photo 6).
- Washing and separating of raw materials (sand and aggregate) on-site with the residual clay/silt pumped to a clarifier and dosed and the clean water is pumped to a Process Dam (Attachment 2, Photos 7 – 9).

3.2 APPROVALS AND DOCUMENTS AUDITED/REVIEWED

3.2.1 Approvals and Licences

The following approvals and licences were reviewed and are listed here: -

- Department DA 267-11-99 MOD 4 approval,
- NSW EPA Environment Protection licence # 6535.
- NSW Water Access Licence # 24163.

3.2.2 Full List of Reports, Checklists and Documents Reviewed

The attached checklists, reports and documents were reviewed and greatly assisted in assessing the outcomes of the Audit process and also helped in the updating of the non-compliances from the 2023 Audit, all of which have now been made compliant. The 2025 Annual Review listed below * was received by the Department on 30 March 2026, during the Audit and was also made available to the Auditor. All other documents and other items reviewed are listed below: -

Compliance Reports

- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2017.
- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2018.

- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2019.
- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2020.
- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2021.
- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2022.
- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2023.
- Compliance Report and Annual Review, VGT Environmental Compliance Solutions and Laboratories, 2024.
- ***Annual Review 2025**. Roberts Road Quarry – Post Approval Document Received – (DA 267-11-99-PA-60). 30 March 2026. Applicable Conditions (Schedule 2, Condition 60).
- Environment Management Plan Approval, Department of Planning and Environment, 2016.
- Environment Management Plan Approval, Department of Planning and Environment, 2018.
- Environment Management Plan Approval, Department of Planning, Industry and Environment, 2022.
- Air Quality Management Plan Approval, Department of Planning and Environment, 2022.
- Operational and Road Noise Management Plan Approval, Department of Planning, Housing and Infrastructure, 2023.
- Independent Environmental Audit, Newport Technical Services Pty Ltd, 2014.
- Independent Environmental Audit, Newport Technical Services Pty Ltd, 2017.
- Independent Environmental Audit, RPS Australia East Pty Ltd, 2020.
- Independent Environmental Audit, James Hart Consulting, 2023.
- Environmental Impact Statement, Nexus Environmental Planning Pty Ltd, 1999.
- MOD 1 Section 96(2) Application, Nexus Environmental Planning Pty Ltd, 2000.
- MOD 2 Section 75W Modification (2), Environmental Assessment, Nexus Environmental Planning, 2015.
- Statement of Environmental Effects, Umwelt (Australia) Pty Ltd, 2019.

Environmental Management Plans

- Environmental Management Plan, VGT Environmental Compliance Solutions and Laboratories, 2018.
- Environmental Management Strategy, VGT Environmental Compliance Solutions and Laboratories, 2018.

Environmental Management Sub-Plans

- Air Quality Management, VGT Pty Ltd, 2017.
- Groundwater Study Report, Dundon Consulting Pty Ltd, 2018.
- Groundwater Monitoring Plan, Dundon Consulting Pty Ltd, 2018.
- Groundwater Management Plan, Dundon Consulting Pty Ltd, 2018.
- Surface Water Management Plan, VGT Environmental Compliance Solutions Pty Ltd, 2022.
- Operational and Road Noise Management Plan, Muller Acoustic Consulting Pty Ltd, 2023.
- Flora and Fauna Management Plan, VGT Environmental Compliance Solutions and Laboratories, 2017.
- Construction Environmental Management Plan, VGT Environmental Compliance Solutions and Laboratories, 2017.

- Landscape and Rehabilitation Plan, VGT Environmental Compliance Solutions and Laboratories, 2018.
- Operational Traffic Management Plan, Pavey Consulting Services, 2022.
- Air Quality Monitoring Review. VGT Environmental Compliance Solutions and Laboratories, 2023.
- Pollution and Incident Response Management Plan, EPA Licence Number 6535, VGT Environmental Compliance Solutions and Laboratories, 2025.

Complaints Register

- Maroota Complaints Register, Hodgson Complaints Register, 2011 – 2026.

Monitoring Results (Biodiversity)

- Flora and Fauna Monitoring Report, VGT Environmental Compliance Solutions and Laboratories (NGH Environmental), 2018.
- Annual Biodiversity Monitoring Report, South East Environmental, 2019.
- Annual Biodiversity Monitoring Report, South East Environmental, 2020.
- Annual Biodiversity Report, South East Environmental, 2021.
- Annual Biodiversity Report, South East Environmental, 2022.
- Annual Biodiversity Monitoring Report, 2025.

Monitoring Results (Noise)

- Equipment Noise Report, Muller Acoustic Consulting, 2018.
- Noise Monitoring Assessment, Muller Acoustic Consulting, 2017.
- Noise Monitoring Assessment, Muller Acoustic Consulting, 2018.
- Noise Monitoring Assessment, Muller Acoustic Consulting, 2019.
- Noise Monitoring Assessment, Muller Acoustic Consulting, 2020.
- Noise Monitoring Assessment, Muller Acoustic Consulting, 2021.
- Noise Monitoring Assessment, Muller Acoustic Consulting, 2022.
- Annual Noise Monitoring Assessment, Muller Acoustic Consulting, 2023.
- Annual Noise Monitoring Assessment, Muller Acoustic Consulting, 2024.
- Annual Noise Monitoring Assessment, Muller Acoustic Consulting, 2025.

Monitoring Results (Climate, Dust, Water) (Pre 2023)

- Monthly Groundwater and Climate Summary, VGT Environmental Compliance Solutions and Laboratories, March 2023.
- Dust Results Tables, 2017.
- Dust Results Tables, 2018.
- Dust Results Tables, 2019.
- Depositional Dust Trends Graphics, 2020.
- Depositional Dust Trends Tables, 2021.
- Dust Trends Graphics, 2022 – 2023.
- Water Quality Results Tables, 2017 – 2020.

Monitoring Results (Climate, Dust, Water), 2023

- Monthly Summary Groundwater Levels, VGT Environmental Compliance Solutions and Laboratories, all months of 2023.

Monitoring Results (Climate, Dust, Water), 2024

- Monthly Summary Groundwater Levels, VGT Environmental Compliance Solutions and Laboratories, all months of 2024.

Monitoring Results (Climate, Dust, Water), 2025

- Monthly Summary Groundwater Levels, VGT Environmental Compliance Solutions and Laboratories, all months of 2025.

Monitoring Results (Climate, Dust, Water), 2026

- January Monitoring Summary, VGT Environmental Compliance Solutions and Laboratories, 2026.
- February Monitoring Summary, VGT Environmental Compliance Solutions and Laboratories, 2026.

3.3 AUDIT COMPLIANCE DESCRIPTORS

Three colour-coded Audit compliance descriptors are used as follows: (1) Compliant, (2) Not Compliant and (3) Not Triggered.

Table 3.1 Colour-coded Audit Compliance Descriptors

Compliant	The Auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirements in the approved conditions have been complied with within the scope of the Audit.
Not Compliant	The Auditor has determined that one or more of the approved conditions have not been complied with within the scope of the Audit.
Not Triggered	A requirement that has an activation or timing trigger that has not been met at the time when the Audit is done. Therefore, an assessment of compliance is not relevant.

3.4 ASSESSMENT OF COMPLIANCE

3.4.1 Reports, Checklists and Documents Reviewed as Part of the Audit Assessment

The attached checklists, reports and documents listed in Section 4.2.2, greatly assisted in assessing the outcomes of the Audit process which also assisted in the updating of the non-compliances from the 2023 Audit, all of which have now been made compliant other than the storage shed issue. The 2025 Annual Review listed above * was received by the Department on 30 March 2026, during the Audit and was also made available to the Auditor.

3.4.2 Issues for Consideration in Reviewing Compliance

This triennial Audit, like its predecessors, is based on a detailed review of the compliance with current approval conditions as observed, during the ongoing operation of Hodgson Quarries and Plant Pty Ltd. The Audit focussed mainly on the implementation of measures described in the most recent Environmental Management Plans (EMP) and other relevant documentation as well as taking into account observations made during the site visit and in discussions with the quarry management. The checklist in Attachment 3 , identifies the compliance issues which could be assessed at the time of the Audit.

While it is not practical for an Audit to ensure that full compliance of all aspects of the project seen during the site visit or found in the relevant reports and documents, there is certainty that the extent of assessing all these items gives enough evidence for verification of the Audit and satisfy the requirements of the regulators.

The following sections cover the more specific issues reviewed.

3.4.3 Air Quality Management

Monthly Air Quality Monitoring Reviews by VGT are listed above and are available on their website up to and including February 2026 and were prepared in accordance with Conditions 29A and 29B of DA 267-11-99 MOD4, using Australian Standards AS3580.19 methods. Areas of the site that could affect air quality under windy conditions are the exposed quarrying areas; cliff faces and unsealed roads. Stockpiles within the quarry void and other areas within the quarry are mostly vegetated with grass apart from newly quarried materials. Dust minimisation is achieved on the quarry roads by using a sprinkler cart. Irrigation sprays are used on the conveyors and stockpiles to minimise dust generation and wind dispersal. There were no recent bushfires recorded in the area during the review period that could impact on the air quality.

In 2025 there were three recorded exceedances for dust, one of which was attributed to a dust storm which originated in South Australia. The other two exceedances were attributed to small local grass fires in Maroota. No exceedances were caused by activities at the quarry, yet this is considered a non-compliance.

The key air quality issue for consideration is the evaluation of 12-months of data for PM2.5. The EPA were contacted about the results which were analysed at a NATA Accredited laboratory. The findings showed no daily or seasonal trends in the concentrations above the limits. There were also periods of heavy rainfall that would minimise dust creation. The air quality monitored on-site is in accordance with the Air Quality Management Plan (AQMP) MOD4 and must be included in all future AQMP's. No exceedances of the depositional dust have been recorded since 2023 and results were consistently low.

As there are also two other air quality monitoring stations at nearby sand quarries the local data is comprehensive enough to meet Audit requirements.

3.4.4 Noise Management

An Annual Noise Monitoring Assessment is undertaken yearly to determine compliance with the EPA's EPL #6535 limits and monitoring is undertaken at seven residential sites, plus ensuring that traffic noise is also monitored. This is in accordance with Conditions 16, 48, 49 and 50 of DA 267 11-99 MOD4 of the consent. Some attended noise monitoring was also undertaken on 19 and 20

November 2025, to further validate results. Noise contributions from the sand quarry did not exceed the EPL limits or DA conditions at any time.

3.4.5 Traffic Management

An Operational Traffic Management Plan (TMP) by Pavey Consulting Services (2022, released in 2023), was prepared based on DA 276-11-99 MOD 4, which allows for the quarry to operate until 2030, extracting up to 480,000 tonnes per annum (tpa) of quarry products with a maximum of 140 truck movements/day (70 in and 70 out) of the site and an hourly limit of 10 truck movements each way. In fact, truck movements have not reached anywhere close to the limit and are unlikely to do so in the current economic climate and extraction has been well below the prescribed limit.

The TMP incorporates a Drivers Code of Conduct, approved transport routes for vehicles coming to and from the quarry. All drivers must be inducted before driving on the site. The majority of the truck drivers are regular contractors and are very co-operative in meeting the TMP requirements.

3.4.6 Groundwater Management

The Groundwater Management Plan (GWMP), includes a monitoring program for testing nine (9) bores to assess the site's impact on groundwater depth and water quality which are part of the important Maroota Sands and Hawkesbury Sandstone aquifers. The first groundwater logger was installed prior to 2015 (MW1) and the remainder in 2017. One logger (MW5), had apparently collapsed, was then abandoned and replaced by nearby MW8. Automatic piezometers record the groundwater depth. Depth monitoring shows that the depth of extraction has been consistently above the Wet Weather High Groundwater level (also confirmed by Stuart Reed), however no adverse impacts have been found in terms of groundwater quality. Schedule 2 Condition 44 of DA 267-11-99 MOD 4 covers the groundwater monitoring program requirement that must be reported to the Department on a six-monthly basis.

3.4.7 Surface Water Management

The summary of the surface water management at Maroota is contained in Chapter 6 of the Annual Review and Compliance Report for Maroota Sand Quarry, year ending 2024. The report confirms that there was no water discharge offsite. Depth monitoring confirmed that all surface water bodies at the quarry are above the groundwater levels in both the Maroota Sands and Hawkesbury Sandstone aquifers. Surface water level in the Process Dam is logged and downloaded monthly. Rainfall is recorded at the on-site weather station and evaporation data is collected from a nearby Bureau of Meteorology (BOM) station.

The EPA has listed no water quality parameters for testing in the EPL; however the organisation expects the licensee to meet Section 120 of the Protection of the Environment Operations Act (POEO) *and* not pollute waters. Surface water quality is relatively poorly buffered in the bore water used in the processing dam which is influenced by the low groundwater pH. The other surface water ponds have a more neutral pH. The highest total dissolved solids (TDS) were found in the tailings dam on 30/07/2025 *(*Monitoring Summary for Hodgson Quarries and Plant Pty Ltd, VGT Environmental Compliance Solutions and Laboratories, Jan. 2026). Overall, there are no significant water quality issues that need treatment and there is no long-term trend showing any decline or significant changes in water quality.

Quarterly water quality monitoring is undertaken and also assesses water levels in the Process Dam. The Surface Water Management Plan (SWMP) also includes consideration of soil erosion monitoring, sediment and water management before and after rainfall. The reporting required on the groundwater monitoring program was listed as a non-compliance in the 2023 EIA under condition 44 (monitoring not undertaken on a six-monthly basis) but has now been rectified.

3.4.8 Observation

Visual inspection of the quarry during the Audit site-visit on 26 March 2026, indicated that recent and more frequent torrential rains have increased sediment erosion around the steep cliffs of the quarry which could become a potential issue in terms of increased danger from local landslip. However, the Auditor was reassured that actions taken by quarry management, i.e., a monthly Workplace Environmental Stability Checklist, a similar checklist is undertaken immediately an alarm is sent warning of inclement weather events (wind or rain) and a Risk Management Plan is in effect, including a Principal Hazard Management Plan, Ground Strata Failure Slope Stability, that any potential issue arising would be well managed.

3.4.9 Waste Management

In general, waste is well managed on-site in terms of storage and disposal. A large number of oil drums were stored in the bunded area of the shed. Empty drums were located outside the bunds which is acceptable. This means that condition O1.1 of EPL # 6535 is compliant.

Outdoors there is also a large amount of rusting equipment and waste tyres lying about that could be reduced in volume. Both observations were mentioned in the previous Audit. Nevertheless, Stuart Reed provided emails showing that the Quarry has ongoing contracts with (1) VIP Drum Recyclers, (2) Metro Tyres and (3) Sims Metals for recycling. He also advised that some old tyres are retained on-site for use in safety barriers and for bunding.

Storage capacity in the shed could also be increased by adding storage units to take some of containers off the floor and creating more space.

3.4.10 Rehabilitation

The 2025 Annual Review and Compliance Report for Maroota Sand Quarry was released during the Audit and its findings were reviewed and are included here. The report confirms that the Landscape and Rehabilitation Management Plan (LRMP) was updated in July 2023, although no approval has yet been received by the Department. The previous LRMP was approved by the Department in 2018. This report was discussed in the 2023 EIA Report. The Annual Biodiversity Monitoring Report (2025) did mention that there is one threatened species *(Acacia bynoeana),* which has survived in small numbers and is in a healthy condition.

The performance indicators and completion criteria presented in Table 44 of the LRMP confirm that none of these criteria have yet been achieved however the final landforms are presented in Appendix B of that report. During the site visit there did not appear to be any new areas disturbed or rehabilitated. A Rehabilitation and Conservation Bond of $313,619.00 was agreed and lodged with the Department as per Schedule 2 Condition 61, which therefore removed a previous non-compliance. The bond will be held by the Department until rehabilitation of the site

is completed to the satisfaction of the Secretary of the Department and then returned to the proponent.

3.4.11 Biodiversity

The 2025 Annual Biodiversity Monitoring Report was prepared by South East Environmental Consultancy which presented the findings of the annual monitoring of the biodiversity value within the quarry complex. Results showed that the remnant native vegetation occurs in the northeastern corner of the property and contains some native *Eucalyptus* and *Angophora* species. A single threatened species of plant with four confirmed individuals, *Acacia bynoeana* may be beginning to increase as they are producing seed pods. At this stage rehabilitation is still very much in its early stages and will increase in intensity over time as quarrying activities begin to decline and quarrying ceases. While native flora regeneration increases and this is helped by keeping livestock away, there is an issue with nuisance weeds which will need to be managed and the report suggests that "continued weed management would benefit the site".

3.4.12 Complaints

The Complaints Register was reviewed and found to have no entries made since records were kept from 2011.

3.4.13 Legal Notices, Penalty Notices, Incidents

No legal notices or penalty infringements nor incidents have been reported since the 2023 IEA. The last EPA EPL licence review and Pollution Incident Management Plan (PIRMP) was tested in 2025. There have been no EPL licence non-compliances recorded.

3.5 KEY STRENGTHS

The Maroota Quarry's environmental performance in terms of compliance with DA 267-11-99 MOD4 is very satisfactory. The Auditor considers that key strengths recognised in the 2023 EIA continue to be achieved and can be summarised as follows: -

- No complaints have ever been received in regard to any quarrying operations.
- Environmental controls continue to be implemented in,
  - Erosion and sediment controls,
  - Water management with no discharges offsite,
  - Noise management and

  Meeting reporting and monitoring requirements.

4. RECOMMENDATIONS BASED ON AUDIT FINDINGS

4.1 NON-COMPLIANCES 2026

A total of 5 non-compliances were found during the current Audit (Table 4.1). The full list of all conditions for DA 267-11-99 MOD4 and their findings are found in the Attachment 3 Audit Table. All other conditions that were audited were compliant or not-triggered and a small number of conditions have been deleted (condition 23, 24, 25 and 52) as they no longer apply.

Table 4.1 Non-compliances in DA 267-11-99 and EPL #6535 in 2026

Condition	Requirement	Issue	Recommendation
2 DA 267-11-99	The Proponent, in acting on this approval, must carry out the project in accordance with: The latest conditions of this approval; and All written conditions of the Secretary. 2(a) The most recent documents shall prevail if there is any inconsistency in the documents.	A small number of non-compliances have been identified with conditions of consent, triggering a non-compliance with this condition	It is recommended that all non-compliances found are addressed and closed out. A small number of Non-compliances have been recorded during this Audit which triggers a non-compliance with this condition.
28 DA 267-11-99	The Applicant must that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not cause exceedances of the air quality criteria listed in Table 11 of the 2025 Annual Report.	Dust monitoring data up to March 2026 viewed by the Auditor. This is listed as a non-compliance even though the cause of the exceedances is outside the control of the Company.	Air Quality Monitoring Report. Three small exceedances were reported in the previous 12 months, none of which were sourced at the Quarry, a) A dust storm in South Australia, and b) Two small grass fires in Maroota.

54 DA 267-11-99	In construction of the bund walls at the corner of Roberts Road and Old Northern Road, the Applicant shall minimise disturbance to existing native vegetation.	Seen during the site inspection.	This Condition needs to be reviewed in light of comments (16/04/2026 and raised during previous Audits of 2020 and 2023, from the Hills Shire Council, which stated, *the provision and maintenance of bunding and landscape screening around the site and resultant visual impact from external properties.* These comments should be considered a trigger to expand the area of cover by planting of local native vegetation to improve the visual aspect.

Table 4.2 Summary of 13 non-compliances in 2023 and Actions Completed

Condition	Requirement	Issue	Recommendation
2 Planning	The Proponent, in acting on this approval, must carry out the project in accordance with: (a) the conditions of this approval; and (b) all written directions of the Secretary	Non-compliances have been identified with conditions of consent, triggering a non-compliance with this condition.	It is recommended that all non-compliances identified are addressed and closed out. Consider implementing a process to track compliance requirements and status. Completed
42	The Applicant shall prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with DPIE Water by suitably qualified and experienced person/s whose appointment has been approved by the Secretary, and be submitted to the Secretary for approval by 31 December 2016. The plan must be updated on an annual basis in consultation with DPIE Water for three years from the date of approval of Modification 2 and thereafter as agreed with by the Secretary. The Applicant shall implement the approved management plan as approved from time to time by the Secretary	Surface Water Management Plan requires the following monitoring to be conducted: • monitoring of the soil erosion, sediment and water is undertaken regularly and within 24 hours of expected rainfall and within 18 hours of a rainfall event of sufficient intensity and duration to cause runoff (approximately 70mm of rainfall over 5 days). • Visual check of stability and operation of all banks, ponds, channels and spillways undertaken monthly. • Visual inspection for evidence of tailgate discharge and/or sediment build-up at exit to site – Weekly However, no records were available to verify that inspections had been conducted.	Documented records should be maintained to verify monitoring and inspections have been completed in accordance with the Surface Water Management Plan. Completed
44	The results of the Groundwater Monitoring Program shall be reported to the	Reporting on the Groundwater Monitoring Program not undertaken on a six monthly	A process should be implemented to ensure that the results of the

Condition	Requirement	Issue	Recommendation
	Department and DPIE Water, using contour plans depicting the surface topography, updated contour maps of the wet weather high groundwater level of the regional aquifer and proposed depth of extraction for each extraction Phase. Reporting is to occur on a six monthly basis for the duration of extractive operations, and throughout rehabilitation of the site, unless otherwise agreed with the Secretary. The Applicant shall implement the Groundwater Monitoring Program as approved from time to time by the Secretary.	basis.	Groundwater Monitoring Program are reported to the Department and DPIE Water on a six-monthly basis. Completed
50A	The Applicant must prepare a Traffic Management Plan that must: (a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary; (b) be prepared in consultation with TfNSW and Council; (c) include a Drivers' Code of Conduct that contains procedures to ensure that drivers: (i) adhere to posted speed limits or other required travelling speeds; (ii) adhere to designated transport routes; (iii) implement safe and quiet driving practices; and (iv) minimise potential conflict with school buses.	Traffic Management plan requires formal observation of compliance of both the Drivers Code of Conduct and Covering of Loads at three monthly intervals to be undertaken to document any departures and identify any remedial actions with employees, heavy vehicle drivers or haulage companies that may be necessary as a result of these observations. No records of completion of formal observations were available.	Formal observation of compliance of both the Drivers Code of Conduct and Covering of Loads should be undertaken and documented at three monthly intervals. Completed

Condition	Requirement	Issue	Recommendation
	(d) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct; and (e) propose measures to minimise the transmission of dust and tracking of material onto the surface of public roads from vehicles exiting the site. The Applicant must submit the Traffic Management Plan for the approval of the Secretary by the 31 October 2021, or as otherwise agreed by the Secretary. The Applicant must implement the Traffic Management Plan as approved.		
60	The Applicant shall prepare a Landscape and Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval by 30 June 2017, unless otherwise agreed by the Secretary; (b) provide details of the conceptual final landform and associated land uses for the site; (c) describe the short, medium and long-term measures that would be implemented to ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent; (d) include a detailed description of the	The Landscape and Rehabilitation Plan has not been updated each 3 year period, or following approval of DA 267-11-99 Mod 4.	A process should be implemented to ensure that the Landscape and Rehabilitation Plan is 3 yearly as required by 60(d) and following changes to conditions of approval. Completed

Condition	Requirement	Issue	Recommendation
	measures that would be implemented over the next 3 years (to be updated for each 3 year period following the 3 years covered by the initial approval of the plan) including the procedures to be implemented for: ► maximising the salvage of environmental resources within the approved disturbance area for beneficial reuse; ► protecting vegetation and fauna habitat outside the approved disturbance area on-site; ► minimising the impacts on native fauna; ► landscaping the site to minimise visual and lighting impacts; ► reviewing improved pasture species and application rates; ► controlling weeds and feral pests; ► controlling erosion; ► controlling access; and ► bushfire management; (e) include a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria; (f) include a mass balance calculation to ensure that appropriate volumes of material are available to implement the final landform as described in this plan;		

Condition	Requirement	Issue	Recommendation
	(g) provide for the construction and maintenance of the process water dam in accordance with the approved design and construction criteria (see Condition 42(b)); (h) identify the potential risks to the successful rehabilitation of the site, and include a description of the contingency measures that would be implemented to mitigate these risks; and (i) include details of who would be responsible for monitoring, reviewing, and implementing the plan. The Applicant shall implement the management plan as approved from time to time by the Secretary		

Condition	Requirement	Issue	Recommendation
61	By 31 December 2017, the Applicant shall lodge a Conservation and Rehabilitation Bond with the Department to ensure that the management of biodiversity and the rehabilitation of the site are implemented in accordance with the performance and completion criteria set out in the Flora and Fauna Management Plan and Landscape and Rehabilitation Plan. The sum of the bond shall be determined by: (a) calculating the cost of rehabilitating the site taking into account the likely surface disturbance over the following 3 years of quarrying operations; and (b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary. Note: If the rehabilitation of the site is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.	A Conservation and Rehabilitation Bond has not been lodged with the Department	The payment of the Bond was lodged since the 2023 EIA. Completed.

Condition	Requirement	Issue	Recommendation
64	The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in this Consent. Any exceedance of these criteria and/or performance measures constitutes a breach of this Consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.	Exceedance of PM2.5 criteria in October 2021 a result of local bushfire. Exceedance of Dust deposition criteria in 2022. Exceedance was found to be the result of contamination of the ample with sand as a result of maintenance activities in the near vicinity of the dust gauge, and not the result of dust generated by the project. Both exceedances were reported to DPE with no further action required.	Neither exceedance was the result of dust generation by quarry activities. No further action required.
67	Within 3 months of the submission of: (a) an annual review under Condition 66 above; (b) an incident report under Condition 68		Hodgson Quarries should ensure that a process is implemented to review, and if required update, the strategies, plans, and programs required under

Condition	Requirement	Issue	Recommendation
	below; (c) an audit report under Condition 70 below; or (d) any modification to the conditions of this Consent (unless the conditions require otherwise), the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this Consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review, unless the Secretary agrees otherwise, the revised document must be submitted to the Secretary for approval. Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.		this Consent in accordance with Condition 66. The outcomes of the review should be submitted to the Secretary for approval. Completed.
68	The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing via the Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.	An exceedance of site PM2.5 dust criteria occurred in September 2021 as a result of a local grassfire. The exceedance was not reported to DPE in accordance with Condition 68.	Hodgson Quarries should ensure that all incidents, including exceedances of site monitoring criteria, are reported to DPE in accordance with Condition 68. Completed.

Condition	Requirement	Issue	Recommendation
68A	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing via the Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	Non-compliances identified in the 2021 Annual Review had not been submitted.	All non-compliances should be notified to DPE be in writing via the Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Completed.
70	Every 3 years from the date of this consent and at the completion of works under this consent, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: (a) be 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;	Previous Independent Environmental Audit conducted 4 June 2020. Current audit commenced 28 March 2023.	Hodgson Quarries should ensure that audit are planned and undertaken within 3 years of the date of consent. Compliant in 2026.

Condition	Requirement	Issue	Recommendation
	(c) assess the environmental performance of the development and assess whether it is complying with the requirements in this Consent and any relevant EPL (including any assessment, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and (e) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under the abovementioned approvals. Note: This audit team must be led by a suitably qualified auditor and include experts in any field specified by the Secretary.		
A3.1 EPL	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by	Non-compliances have been identified with the requirements of EPL 6535, which trigger a non-compliance with this condition.	It is recommended that all non-compliances identified are addressed and closed out. Consider implementing a process to track compliance requirements and status.

Condition	Requirement	Issue	Recommendation
	the licensee to the EPA to assist the EPA in connection with the issuing of this licence.		
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	During the current audit, it was found that oils and chemicals had been stored in unbunded locations. In addition, waste material, including used tyres was present in various locations on site	All chemical and hydrocarbon containers should be stored in a bunded area. Waste material stored on site should be gathered and removed by the licenced contractor. Metal parts stored in various locations on site should be tidied up and minimised. Ongoing.

With the payment and lodgement of the Conservation and Rehabilitation Bond occurring since the 2023 EIA was completed Condition 61 was the last non-compliance closed off.

4.2 COMPLIANCES 2026

The vast majority of the other conditions were either compliant or non-triggered and the full details of these are contained in Attachment 3.

4.3 OPPORTUNITIES FOR IMPROVEMENT

The main opportunities for improvement are: -

- If feasible, increase the frequency of recycling empty drums of key materials, such as oil, chemicals and grease in the storage shed to reduce the volume of material in the shed. ;
- Review the current recycling of metals, tyres and drums to optimise their management and offsite removal and
- Consider the Council's ongoing comments regarding the ongoing maintenance of bunding and landscape screening to further improve the coverage of native vegetation in improving the aesthetic view for nearby residents.

5. CONCLUSIONS

The 2026 Independent Environmental Audit of Hodgson Quarry, Maroota has continued to develop and has implemented required management and monitoring plans as required to meet consent conditions under Modification 4 of the development consent (DA 267-11-99). Likewise, the proponent met its environment protection obligations under the EPA's licence conditions and also the WAL conditions.

A total of 3 non-compliances (NC's) were found with regard to the consent and none in the EPL or WAL conditions. An initial concern of seeing oil drums located in cluttered unbunded areas in the storage shed was allayed as the drums turned out to be empty, awaiting recycling. Since the site visit by the Auditor emails were provided confirming that the Quarry has contracts for recycling with a drum recycler, metal recycler and tyre recycler for regular removal of these items when no longer required. Given that formal recycling of oil drums was in place the condition was found to be compliant. Nevertheless, the proponent should address the degree of clutter in the shed, either by organising more frequent recycling or carrying lesser volumes of materials. If not feasible then introduce shelving to free up floor space . At the current time with potential fuel supply issues in the Middle East the Auditor accepts that it may not be practical to reduce the volume of oil stored due to the need for maintaining sufficient supplies to keep the quarrying process working.

This concludes the report.

Kieran Horkan
Lead Auditor and Scientific Director

ATTACHMENTS

Attachment 1: Letter of Appointment

Department of Planning, Housing and Infrastructure

Reference: DA267-11-99-PA-58

Stuart Reed
Environmental Officer
Hodgson Quarries and Plant Hire Pty Ltd
PO Box 1778
Gosford, New South Wales 2250

23/02/2026

Sent via the Major Projects Portal only

Roberts Road Quarry - Request for auditor approval – 2023 – 2026

DA267-11-99

I refer to your request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Audit of the Roberts Road Quarry (**Project**), submitted as required by Schedule 1, Condition 70 of DA267-11-99 as modified (the **Consent**) to NSW Department of Planning, Housing and Infrastructure (the **Department**) on 13 February 2026.

The Department has reviewed the independent auditor nomination and based on the information you have provided is satisfied that the proposed person is suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I approve the appointment of –

- Kieran Horkan of Organized Rhyme Environmental Consultancy - lead auditor -

to prepare the independent environmental audit for the Project.

Please note:

- This correspondence must be appended to the Independent Audit Report.
- The Department requests that the Independent Audit be prepared, undertaken, and finalised in accordance with the conditions of Consent and the Department's *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission.
- Operational Audits – The above auditor is approved for the current operational audit only. Additional approval must be sought from the Planning Secretary for future audits of the development.
- Any change to the auditor or auditor roles must be approved by the Planning Secretary prior to the audit commencing.

- The Auditor must attend the site inspection component of the audit.
- Endorsed experts/specialists must attend the site inspection component of the audit unless otherwise agreed by the Planning Secretary.
- The audit period is the day after the site inspection date of the previous audit, to the final site inspection date of the current audit.

Should you wish to discuss the matter further, please contact Gabriel Peters Shaw, Senior Compliance Authority on 0288376395 or email compliance@planning.nsw.gov.au

Yours sincerely

Julia Pope
Team Leader Compliance - Metro North
Compliance

As nominee of the Planning Secretary

Attachment 2: Photographs Taken on 26 March 2026 Site Visit

Photo 1 Entrance to Maroota Sand site with weighbridge in the background

Photo 2 Oil drums stored in bunded area on right-hand side. The oil drum outside the bunded area is empty awaiting recycling.

Photo 3. Miscellaneous stored drums and other containers in the same storage shed. This has since been tidied up.

Photo 4. Looking into the deep quarry void with the extraction area at the bottom. Erosion noted on the steep slopes is regularly monitored by the Quarry Management.

Photo 5 Excavator working area deep in the quarry void and erosion also noted on the steep sides.

Photo 6 General overview of quarrying activities.

Photo 8 Sand being washed, separated from stones and gravel and ready for stockpiling and sale.

Photo 9 Ready for market clean sand stockpiles in background; conveyor equipment in foreground.

Photo 10 Clean sand coming from conveyor, ready for stockpiling.

Photo 11 Close up of gravel and coarse material being separated from clean fine sand.

Attachment 3: Independent Audit Compliance Tables

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
Schedule 2 Administrative Condition 1	There is an obligation on the Applicant to minimise harm to the environment throughout the life of the project. This requires that all practicable measures are to be taken to prevent and minimise harm from the construction, operation and where relevant, the decommissioning of the development.		All measures have been documented and implemented to manage environmental impacts of the project. No material harm has resulted from the project.	Compliant
Administrative Condition 2 and Condition 2(a)	The Proponent, in acting on this approval, must carry out the project in accordance with: The latest conditions of this approval; and All written conditions of the Secretary. 2(a) The most recent documents shall prevail if there is any inconsistency in the documents.	A small number of non-compliances have been identified with conditions of consent, triggering a non-compliance with this condition.	It is recommended that all non-compliances found are addressed and closed out. A small number of Non-compliances have been recorded during this Audit which triggers a non-compliance with this condition.	Non-compliant
Condition 3 Compliance	The Proponent shall comply with all reasonable requirements of the Secretary in respect of the implementation of the Consent Conditions, within such time as the Secretary agrees. The Secretary may order the Applicant to cease work until non-compliance has been addressed to the Secretary's satisfaction.	No issues raised.	Weed management has continued monthly in response to a request from the DPE and complied with as reported in the 2025 Annual Review.	Compliant
Condition 4	The Application shall ensure that all contractors and sub-contractors are aware of and comply with the Conditions of the Consent.	Site Induction with Environmental Induction Checklist	Site Inductions work well and covers the various aspects of correctly managing potential environmental impacts.	Compliant
Condition 5	The Applicant shall comply with all relevant conditions prescribed in Part 7 of the EP & A		No new construction has been undertaken since the previous	Not Triggered

	Regulation 1994, as required by Section 80A(11) of the Act.		Audit	
Condition 6	The Applicant will submit a Conditions Compliance Report to the Secretary prior to the commencement of extraction in areas that are not currently subject to extraction. Subsequent reports will be submitted annually for the first three years in areas not subject to extraction. Further reports shall be submitted as required by the Secretary. To enable ready comparison with the EIS's predictions, diagrams and tables the Conditions Compliance Reports shall include, but not be limited to, the following matters : a) A compliance audit of the performance of project against conditions of Consent and statutory approvals, b) A review of the effectiveness of the environmental management of the development, c) The results of environmental monitoring required under this Consent or other approvals, including interpretations and discussion by a suitably qualified person, d) A listing of any variations obtained to approvals applicable to the DA since the last report, e) A record of all complaints and the actions taken to mitigate all such	Independent Environmental Audit, Roberts Road Maroota Sand Quarry, 2023. Development Consent DA 267-11-99 MOD 4, James Hart. 2022 Compliance Report and Annual Review, 2023 Compliance Report and Annual Review and 2024 Compliance Report and Annual Review.	Annual reviews for the last three years have been reviewed by the Author and have been submitted in accordance with Condition 66.	Compliant

	complaints, f) A report detailing all the rehabilitation measures undertaken since the last report, and Environmental management targets and strategies for stages of the development yet to be completed.			
Condition 7	The Secretary may, after considering a Conditions Compliance Report, notify the Applicant of any reasonable requirements for compliance with this Consent. The Applicant shall comply with those requirements within such time as the Secretary may direct. Note: The Applicant is obliged to ensure that all statutory requirements, including all relevant legislation, Regulations, Australian Standards, Codes, Guidelines and Notices, Conditions and Directions of Councils and relevant government agencies are met and approvals obtained.	Discussed during the site visit meetings.	The Proponent has kept up to date with project documentation to address comments from DPIE and also holds updated EPA EPL and a Water Access Licence.	Compliant
Condition 8 Limits on Approval	No extraction shall occur in areas that are not currently subject to extraction, until the Applicant has: a) Constructed the bund walls at the corner of Roberts Road and Old Northern Road, *b)* Submitted the Conditions Compliance Report required under Condition 6; and Obtained all licences necessary for the commencement of extraction.	Site meetings and Inspection	a) Bund wall is in place, b) Condition Compliance Reports have been submitted as per Condition 6. Water Access Licenses are in place for the boreholes and dams and copies of these are available on-site. The EPL and Consent remain valid.	Compliant

Condition 9	The duration of this Consent is until 31 May 2030. The Applicant shall ensure that rehabilitation of all disturbed areas is completed within six months of extraction.		Extraction is still within the Approved extraction period.	Compliant
Condition 9A	The Applicant must not: a) Process or dispatch more than 480,000 tonnes of quarry products at the site in any calendar year, b) Receive more than 320,000 tonnes of VENM and ENM (in total) at the site in any calendar year, c) Import more than 3 Million tonnes of VENM and ENM to the site, and Import VENM and ENM beyond 31 May 2030.	Annual Review and Compliance Reports as per Condition 6 above.	Annual production tonnes (approved limit 480,000t): **Year Production EPL Limit** 2022 75,054t 480,000t 2023 71,413t 480,000t 2024 51,499t 480,000t VENM/ENM (approved limit 320,000t) 2022 6,632t 320,000t 2023 22,234t 320,000t 2024 117,434t 320,000t	Compliant
Condition 10 Complaints Procedures	Prior to commencement of construction, the Applicant shall: a) Publicise a telephone number on which complaints about the subject development can be registered during the hours of operation in Condition 16; and b) c) Publicise a postal address where written complaints may be lodged. The telephone number and postal address shall be displayed on the property where it can be read from a public road, for the duration of the development.	Seen during site inspection; also on website: https://www.vgt.com.au/hodgsons	Telephone number and postal address is located on the front gate. A Complaints number is included on the project website.	Compliant

Condition 11	The Applicant shall record details of all complaints received and actions taken in response to complaints in an up-to-date logbook. The logbook shall be made available for inspection upon request by the Secretary, the EPA or the Council; and a summary of the complaints received shall be included in the Conditions Compliance Reports under Condition 6	Hodgson Quarries Complaints logbook records viewed over several years and seen by the Auditor.	Complaints register continuously recorded from 2011 to 2026 however no complaints were ever received.	Compliant
Condition 12	The Applicant shall ensure that an initial response to complaints is provided to the complainant within 24 hours of receipt. The Applicant shall then: a) Investigate complaints raised by the complainant and undertake all reasonable attempts to determine the cause of concern; and b) If adverse impacts are identified, undertake all practicable measures to modify the activity which may be causing the impacts.	Hodgson Quarries complaints logbook records viewed over several years.	Comment as per Condition 11 above. No complaints ever received.	Not triggered
Condition 13	If the Applicant's response does not address the complaint to the satisfaction of the complainant within six weeks, the Applicant shall inform the Secretary and take any action as directed by the Secretary. This may include a requirement to carry out independent investigations of noise and/or dust at the cost of the Applicant, in accordance with Condition 14.	Hodgson Quarries complaints logbook records viewed over several years	Comment as per Condition 11 above. No complaints ever received	Not triggered
Condition 14	If the Secretary is satisfied that an independent	Hodgsons Quarries complaints	Comments as per Condition	Not triggered

	investigation is required, the Applicant shall: a) Appoint a qualified independent person or team to plan and implement an investigation to qualify the impact and determine the sources of the impact, and b) Bear the cost of the independent investigation and make available plans, programs and other information necessary for the independent person to form an appreciation of the past, present and future works and their effects on dust and/or noise emissions. This investigation is to be carried out in accordance with a Documented Plan. The Plan shall be designed and implemented to measure and/or compute (with appropriate calibration by measurement) the relevant noise and/or dust levels at the complainant's property, that are emitted by the development; and specify a monitoring period and reporting schedule. The Independent person or team, the Plan and the timing of its implementation, shall be approved by the Secretary. The independent person or team shall report to the Secretary and the Applicant. Further independent investigations shall cease if the Secretary is satisfied that the relevant levels are not being exceeded and are unlikely to be exceeded in the future.	logbook records viewed over several years.	11 above. No complaints ever received.	
Condition 15 Dispute	In the event that Applicant, Council, the PCA or a government authority other than the Department,		No disputes have been raised.	Not triggered

Resolution	cannot agree on the specification or requirements applicable under this Consent, the matter shall be referred by either party to the Secretary or, if not resolved by the Minister, whose determination of the disagreement shall be final and binding on the parties.			
Condition 16 Hours of Operation	Unless prior written approval of the EPA is obtained, the hours of construction are: ● Construction: 7.00 am – 6.00 pm Monday to Friday. ● Extraction and processing of material: 7.00 am – 6.00 pm Monday to Friday; 6.00 am – 1.00 pm Saturdays. ● No works to be undertaken on Sundays or Public Holidays. These restrictions do not apply to routine maintenance work, such as the repair of machinery, provided the work does not in exceedance of the noise limits in Condition 47.	Discussed at site meetings.	Operating hours are being observed.as per Condition 16.	Compliant
Condition 17 Depth of Extraction	The Applicant shall ensure that extraction does not take place below a level 2 meters above the wet weather high groundwater level of the regional aquifer, as measured and mapped on the site (see Conditions 39(d) and 44).		Section 6.5.1 of the March 2025 Annual Review confirms this. The rolling average of wet weather high groundwater levels are regularly calculated. Condition is being met.	Compliant
Condition 17A Production Data	The Applicant must provide Mining, Exploration and Geosciences (MEG) with annual quarry production data, covering a full calendar year, by no later than 30 January for the following calendar year.	Included in the Annual Review released March 2026.	Since MOD4 DA MEG requires that this data be supplied on a financial year basis and this was inserted in the latest Annual Review.	Compliant

Condition 17B	The data must be provided using the relevant standard form and a copy of the data must be included in the Annual Review (required under Condition 66)	Annual Review released March 2025. A comprehensive list of data is provided in Appendix E and seen by the Auditor.	Since MOD4 DA 267-11-99, this has been included in each Annual Review. The relevant standing reporting forms were used in the report.	Compliant
Condition 18 Environmental Management Plan	The Applicant shall prepare a Construction Environmental Management Plan (CEMP) to the satisfaction of the Secretary, prior to commencement of construction. The CEMP shall contain appropriate measures which demonstrate how the environmental objectives for the project will be achieved, including objectives stated in the Consent; containing a monitoring, reporting and response program. The Applicant shall implement the approved CEMP as approved from time to time by the Secretary.	CEMP report for the quarry, 2017 by VGT Pty Ltd and seen by the Auditor and is available on the VGT website.	CEMP report available on the VGT Pty Ltd website for Hodgson Quarries.	Compliant
Condition 19	The Applicant shall prepare an Operational Environment Management Plan (OEMP) in consultation with the relevant authorities to the satisfaction of the Secretary, prior to the commencement of extraction under this DC. The OEMP shall incorporate and integrate environmental management for the existing extraction areas, as well as the areas approved under the DC.	OEMP report for the quarry, 2018 held by VGT Pty Ltd	OEMP report available on the VGT website for Hodgson Quarries.	Compliant
Condition 20	The OEMP shall include, but not be limited to: - a) Environmental objectives for the site, b) The AQMP (Condition 29), c) The WQMP (Condition 42), d) The NMP (Condition 46), e) The RNMP (Condition 48), f) The TMP (Condition 50A),	OEMP for the quarry, 2018 held by VGT Pty Ltd but since confirmed. Other reports confirmed within the Audit period but after the site visit date allows a compliance rather than a non-compliance to be accepted.	a) Section 4, Environmental Objectives and Targets, b) AQMP submitted 28/02/2023, c) WQMP submitted 28/06/2022,	Compliant

	g) The FFMP (Condition 55), and h) The LRMP (Condition 58).		d) NMP submitted 03/04/2024, e) RNMP 09/12/2016 f) TMP 22/11/2022 by Pavey g) FFMP 09/12/2016 h) LRMP July 2023	
Condition 21	The Applicant shall make copies of both EMP's available to Council, EPA and DPIE Water within 14 days of approval by the Secretary. The Applicant shall also make a current copy of the OEMP's available for inspection by the public or these agencies for the duration of the Consent.	https://vgt.com.au/hodgsons	Verified in previous two EIAs (2020 and 203). The OEMP includes the CEMP as a sub-plan on the website and can be viewed online.	Compliant
Condition 22	The Applicant shall, in consultation with the Secretary, EPA and DPIE Water, update the OEMP from time to time to ensure continuing compliance with Consent Conditions and all relevant approvals and licences. The EMR shall be responsible for determining if any significant changes to the OEMP should be referred to the Secretary for approval. The Applicant shall implement the approved management plan as approved from time to time by the Secretary.		The OEMP does not appear to have been updated since the 2018 report, and **was mentioned in the previous EIA and needs to be undertaken now to ensure incorporation of all changes in DA 267-11-99 MOD 4. Since the Audit reported was drafted the Department has updated this and it is now compliant.**	Compliant
Conditions 23, 24 and 25	**Deleted**			**Deleted**
Condition 26 Importation of VENM and ENM	The Applicant must: a) Ensure only verified VENM and ENM is received at the site, b) Collect data on the VENM and ENM received including detail of the origin,	No unauthorised wastes observed during site visit.	Recent records sighted in the Annual Report. See total tonnage listed in Condition 9A above.	Compliant

	date and quantity received; and Include a copy of this in the Annual Report.			
Condition 27	No other materials classified as waste under EPA's Waste Classification Guidelines 2021, may be received or processed on the site, except a expressly approved in an applicable EPL, specific Resource Recovery Order or Exemption under the POEO (Waste) Regulation 2014	No unauthorised wastes observed during the site visit.	No such waste has been received at the premises. On-site waste is managed through the appropriate use of bins which are removed by a contractor; waste oil is also removed legally from time to time as required.	Compliant
Condition 28 Air Quality Criteria	The Applicant must that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not cause exceedances of the air quality criteria listed in Table 11 of the 2025 Annual Report.	Dust monitoring data up to March 2026 viewed by the Auditor. This is listed as a non-compliance even though the cause of the exceedances is outside the control of the Company.	Air Quality Monitoring Report. Three small exceedances were reported in the previous 12 months, none of which were sourced at the Quarry, a) A dust storm in South Australia, and b) Two small grass fires in Maroota.	Non-compliant
Condition 28A	The air quality criteria in Table 11 of the2025 Annual Report do not apply if the Applicant has an agreement with the owner(s) of the relevant residence or infrastructure to exceed the Air Quality Criteria and the Applicant has advised the Department in writing of the terms of this agreement.	Monitoring data up to March 2026 viewed by the Auditor.	No agreement has been entered into with any owners.	Not Triggered
29	The Applicant shall prepare an Air Quality	Various reports including the	a)– e) conditions have been	Compliant

	Management Plan as part of the EMP. The Air Quality Management Plan shall: a) identify existing and potential sources of dust deposition, TSP and fine particulates (PM10 and PM2.5) and specify appropriate monitoring intervals and locations. The purpose of the monitoring is to evaluate, assess and report on these emissions and the ambient impacts with the objective of understanding the development's contribution to levels of dust deposition, TSP and fine particulates in ambient air around the site; b) provide a monitoring plan having regard to local meteorology and the relevant Australian Standards, identifying the methodologies to be used, including justification for monitoring intervals, weather conditions, seasonal variations, selecting locations, periods and times of measurements; c) provide details of dust suppression, including a planting and watering regime to ensure that areas of the site which are exposed and active at any one time are minimized to the greatest extent practicable. The use of a polymer in the water to minimise dust impacts shall be	Compliance Report and Annual Review (March 2025); Air Quality Management Plan (2016) by VGT Pty Ltd; Air Quality Monitoring Review 2022 by VGT Pty Ltd; and the 2020 and 2023 Independent Environmental Audit Reports.	met.	

	investigated as part of this Plan; d) provide details of actions to ameliorate impacts if they exceed the relevant criteria; and e) provide the design of the active management system intended to reduce the day-to-day impacts of dust and fine particulates due to the development. The Applicant shall implement the approved management plan as approved from time to time by the Secretary.			
29A	The Applicant must commission an expert review of the air quality monitoring system at the site. This review must: (a) be undertaken by a suitably qualified and experienced person(s) whose appointment has been approved by the Secretary; (b) review the accuracy of the air quality monitoring system at the site over a 12-month period, in general accordance with the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007) and with a particular focus on PM2.5 monitoring; (c) provide recommendations (where required) to improve the accuracy of air quality monitoring system at the site; and (d) be undertaken in consultation with the EPA.	The Air Quality Management Plan (AQMP) amendments as required in the review have been done by an approved independent expert as required, under Conditions 29A and 29B and documented in the 2025 Compliance Report and Annual Review (March 2025); meets DA 267-99-11 MOD4 Planning requirements. EPL # 6535.	This has been done for items (a) – (d) as per the approved independent expert's advice.	Compliant
29B	A copy of the expert review report along with a	The independent expert review	Air Quality Monitoring Review	Compliant

	timetable for implementing any recommendations arising from the review required under condition 29A of this Schedule, must be submitted by 30 November 2022, or as otherwise agreed by the Planning Secretary. The Applicant must implement the recommendations of the expert review to the satisfaction of the Secretary.	report and its timetable have been undertaken and submitted as required. The recommendations from the review are being followed.	updated 21/07/2023.	
30	Activities occurring at the premises must be carried out in a manner that will minimise emissions of dust from the premises.	Site meeting and inspection.	Air Quality Management Plan 2016. Air Quality Monitoring Review updated 21/07/2023. Dust emission mitigation measures are included in the AQMP. No visible dust was seen on the inspection date and the water cart was working on-site. EPL # 6535 conditions being met too.	Compliant
31	The Applicant shall cease offending work at such times when the operations are resulting in emissions blowing in a direction so as to cross onto public roads or lands not owned by the Applicant.	Site meeting and inspection.	There have not been any instances where work was required to be ceased due to dust generation. Dust is minimized by using sprinklers on the stockpiles and a water cart on the roads.	Compliant
32	The Applicant shall install, operate and maintain a sprinkler system to adequately water all cleared areas and stockpiles to minimise dust emissions to acceptable levels.	Site inspection confirmed this.	Monitoring data for dust is consistently below the limits.	Compliant
33	The Applicant shall ensure that all vehicular movements on unsealed areas are restricted to specific routes and that all vehicles within the	Site inspection observed some on-site vehicular truck movements which did not exceed the 5 kph	The truck drivers have been inducted and observe the on-site rules.	Compliant

	subject site keep to a speed limit of 30 km/h.	speed limit.		
34	The Applicant shall ensure that trucks are covered when entering and leaving the premises carrying loads of potentially dust-generating material.	Site inspection.	This rule is also part of the induction training and is being observed.	Compliant
35	All monitoring equipment is to be installed and operational prior to commencement of construction.	Construction is already completed.	The Auditor believes that this condition was met and evidence from measured data shows that the dust monitoring equipment has been installed and is working properly.	Compliant
36	Operation of dust deposition gauges and monitoring must be carried out in accordance with; (a) Australian Standard 3580.10. 01 (1991) Particulates – Deposited Matter – Gravimetric Method. Approved method AM-19 referred to in Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales, December 1999. (b) Australian Standard 2724.3 (1984) Particulate Matter – Determination of Total Suspended Particulates (TSP) - High Volume Sampler Gravimetric Method. Approved method AM 15 referred to in Approved Methods for the sampling and Analysis of Air Pollutants in New South Wales, December 1999.	Information is in VGT-Hodgson Quarry Reports and in the 2024 Compliance Report and Annual Review.	This issue resulted in a non-compliance in earlier Audits but following an EPA request to better locate one monitoring gauge and meeting the updated Australian Standard which is AS/NZS 3580.9.11.2022.	Compliant

	(c) Australian Standard 3580.9.6 (1990) for Suspended Particulate Matter – PM10 High Volume Sampler with Size Selective Inlet-Gravimetric Method. Approved method AM-18 referred to in Approved Methods for the Sampling and Analysis of Air Pollutants in New South Wales, December 1999.3			
37	A meteorological station measuring wind speed and direction must be installed and operated by the Applicant at a site determined in consultation with the EPA.	Site Inspection	The meteorological station was previously installed and is working.	Compliant
Note	The Applicant is required to obtain the necessary water licenses for the development under the Water Act 1912 and/or Water Management Act 2000.	Water licence number WAL 24163.	WAL 24163, obtained as required.	Compliant
38	The Applicant shall not extract: (a) below a depth of 182 m AHD in the footprint of the Process Water Dam, if not already extracted as at the date of Modification 2; and (b) below a depth of 186.1 m AHD in all other areas of the site; (c) unless in accordance with Condition 17 and following written notification to the Secretary and DPIE Water.	Compliance Report and Annual Review (March 2025) for Maroota Sand Quarry DA 267-11-99 MOD 4.	No extraction was occurring in the Process Dam during the current Audit. Current maximum depth for the site is 185 m AHD	Compliant
39	Within six weeks of the date of approval of Modification 2, the Applicant shall commission a comprehensive groundwater study of the site. This study must:	Listed in the 2023 Independent Environmental Audit. Dundon Consulting Pty Ltd Groundwater Monitoring Program Report re-issued 2018.	Most recent Monitoring Summary for period 02/03/2026 – 01/04/2026 by VGT Environmental Compliance Solutions and	Compliant

	(a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Secretary and DPIE Water; (b) consult with DPIE Water; (c) examine all existing records of groundwater levels at the site; (d) develop an interim contour map of the wet weather high groundwater level of the regional aquifer, based on all available records (see also Condition 44); and (e) provide advice and recommendations on the Groundwater Monitoring Program as set out in Condition 43.		Laboratories covers ongoing monitoring.	
40	Unless otherwise agreed by the Secretary, the Applicant shall submit a report of the study to the Secretary and DPIE Water within six months of commissioning the study. The report must be accompanied by a Groundwater Management Improvement Program, based on the study's findings and recommendations which includes a program of proposed timeframes for implementation. Should the Applicant propose not to implement any of the report's recommendations, it must provide detailed justification to this effect. The Groundwater Management Improvement Program must be prepared and implemented to the satisfaction of the Secretary. Progress against the Program shall be reported through	Confirmed by reporting in the Compliance Report and Annual Reviews 2024.	Condition is being met.	Compliant

	Annual Reviews and considered as part of the Independent Environmental Audit.			
41	Within six months of the submission of the Groundwater Study and accompanying documents (see Conditions 39 and 40), the Applicant must infill any area of the site identified as being below the wet weather high groundwater level to at least that level as mapped (see Condition 39(d)). Within six months of any update of the groundwater level contour map, the Applicant must infill any area of the site identified as being below the wet weather high groundwater level to at least that level as mapped (see Condition 44).	Site visit – visual confirmation for the EIA.	Not triggered – similar to findings of the two previous Audits in 2020 and 2023.	Not Triggered
42	The Applicant shall prepare a Water Management Plan for the development to the satisfaction of the Secretary. This plan must be prepared in consultation with DPIE Water by suitably qualified and experienced person(s), whose appointment has been approved by the Secretary and be submitted to the Secretary for approval by 31 December 2016. The plan must be updated on an annual basis in consultation with DPIE Water for three years from the date of approval of Modification 2 and thereafter as agreed with by the Secretary. In addition to the standard requirements for management plans (see Condition 65), this plan must include a:	The Compliance Report and Annual Review (March 2025), includes: (a) The site Water Balance is reviewed annually between the Site Manager and a suitably qualified consultant. (b) The Surface Water Management Plan for 2022 and the Compliance Report and Annual Review also cover all issues listed. (c) The Groundwater Management Plan	The suitably qualified experienced person was approved and the updated Water Management Plan was approved for (a), (b) and (c). The Surface Water Management Plan requires monitoring including, ● Soil erosion, sediment and water is undertaken regularly, importantly within 24 hours	Compliant

	○ Site Water Balance that: - includes details of: ○ sources and security of water supply, including contingency planning; ○ water use on site; ○ o water management on site, including groundwater inflows to the quarry voids and site discharges; and ○ audit and reporting procedures, including comparisons of the site water balance each calendar year; and ○ describes the measures that would be implemented to minimise clean water use on site and maximise recycling opportunities; ○ Surface Water Management Plan, that includes: - a detailed description of the surface water management system on site, including the: - clean water diversion systems; - erosion and sediment controls; - effluent irrigation system; - water transfers from the extraction areas; - water storages; and - discharge points; ○ design objectives and performance criteria	(reissued 2018), likewise.	of expected rainfall, plus within 18 hours of sufficient intensive rainfall to cause runoff (approx. 70 mm rainfall over 5 days). ● Monthly visual checks for stability and operation of banks, ponds, channels and spillways. ● Weekly visual checks for evidence of tailgate discharge and/or sediment build-up at site exit. This was a non-compliance in the 2023 EIA however the issues raised about maintaining documented records for weather events, tailgate and road check and setting an alarm on the	

	for proposed: - erosion and sediment control structures; - water storages, including quarry voids; - site discharges; and - control of water pollution from rehabilitated areas of the site; o performance criteria, including trigger levels for investigating any potentially adverse impacts for surface water quality; o a program to monitor: - the effectiveness of the water management system; - site discharge water quality; and - surface water level and quality in the Process Water Dam, including the quantification of rainfall - inflow, groundwater inflow and evaporation; - a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project; - long term water quality management objectives and the measures to achieve these objectives; o a plan that ensures surface		Weather Station to 155 mm/day have now been rectified and the issue closed off.	

	stormwater runoff from the disturbed areas is directed to the sedimentation dam(s); ○ a plan that ensures tailgate drainage does not discharge into or onto any adjoining public or Crown road, any other persons land, any Crown land, any river, creek or watercourse, any groundwater aquifer, any native vegetation as described under the Native Vegetation Conservation Act 1997 and any wetlands of environmental significance; ○ a detailed description of design and construction criteria for the Process Water Dam based on a feasibility study of: o capacity to construct multiple cells within the overall dam footprint (i.e. a two stage or three stage dam); o whether the dam floor and walls are able to be effectively lined with compacted clay (especially for multiple cells); o whether effective hydraulic separation can be achieved between such cells; o rehabilitating such cells to create a single dam within the final landform; and			

	o the appropriateness of diverting runoff received from off-site around the dam; ○ a strategy for the decommissioning of water ○ management structures, including storage, sedimentation and leachate dams once extraction is complete; and ○ audit and reporting procedures, including comparisons of the monitoring results each calendar year and quarterly reporting of surface water monitoring results; ○ Groundwater Management Plan that takes into account the Web-based Reporting Guideline (DPE 2015) and Groundwater Monitoring and Modelling Plans – Information for Prospective Mining and Petroleum Exploration Activities (DPI 2014), and includes: ○ detailed baseline data on groundwater yield and quality in groundwater bores on privately owned land, that could			

	be affected by the project; ○ a program to undertake surveyed probe testing of all extracted areas where clay fines have been deposited to: o accurately determine the depth of extraction and depth of clay fines; o identify any ongoing intersection or other interaction between clay fines and the regional groundwater aquifer; o identify any geotechnical characteristics of the emplaced clay fines which may pose risks to workplace safety or implementation of the process water dam design or the final landform; and o identify measures which can be successfully used in rehabilitating these areas; ○ a program to monitor potential groundwater quality impacts to the regional aquifer from receiving off-site runoff water in the Process Water Dam; ○ groundwater assessment criteria, including trigger ○ levels for investigating any potentially adverse groundwater impacts, in accordance with the NSW Aquifer Interference Policy; ○ a program to monitor: o the impacts of the project on: ○ groundwater inflows to water storages;			

	○ any groundwater bores on privately-owned land that could be affected by the project; and o seepage from water storages or backfilled voids on site; ○ a plan to respond to any exceedances of the groundwater assessment criteria; ○ emergency contingency plans for implementation in the event that the groundwater is encountered during excavation; and ○ audit and reporting procedures, including comparisons of the monitoring results each calendar year and quarterly reporting of groundwater monitoring results, The Applicant shall implement the approved management plan as approved from time to time by the Secretary.			
43	The Applicant shall prepare a Groundwater Monitoring Program for the development to the satisfaction of the Secretary. This program must: (a) be prepared in consultation with DPIE Water and be submitted to the Secretary for approval within four months of the date of approval of Modification 2;	The Groundwater Monitoring Program (re-issued 2018) for Maroota Sand Quarry and the Compliance Report and Annual Review (March 2025) meet these requirements in the latest modification of DA 267-99-11 MOD 4.	The monitoring nine bore network which was installed in 2016 includes MW8 which replaced MW5 (which collapsed); two boreholes MW9 and MW13 are mined out and no longer in use for water sampling.	Compliant

	(b) include proposed construction of a network of at least five active monitoring bores around the south-eastern, southern, western and north-western boundaries of the extraction area (but outside of the overall extraction footprint) in proximity to extraction Phases 1 to 6 as identified in Modification 2, to collect continuous groundwater level monitoring data from the regional aquifer; (c) include proposed construction to deepen (or replace) PT84MW1 in order that a bore in that general location monitors the regional aquifer; and (d) include proposed construction of active monitoring bores within the largest components of at least the two forthcoming extraction Phases (on a rolling basis), each to collect at least 2 years of continuous baseline groundwater monitoring data prior to extraction commencing with that Phase.			
44	The results of the Groundwater Monitoring Program shall be reported to the Department and DPIE Water, using contour plans depicting the surface topography, updated contour maps of the wet weather high groundwater level of the regional aquifer and proposed depth of extraction for each extraction Phase. Reporting is to occur on a six-monthly basis for	The Compliance Report and Annual Review (March 2025) contain the latest data.	This was a non-compliance in the 2023 EIA, as the reporting to the Department did not take place as required on a six-monthly basis. This information is now updated to the Department's Portal (DA 267-11-99 MOD4) and to DPE Water. The information is	Compliant

	the duration of extractive operations, and throughout rehabilitation of the site, unless otherwise agreed with the Secretary. The Applicant shall implement the Groundwater Monitoring Program as approved from time to time by the Secretary.		publicly available on www.vgt.com.au/hodgsons The depth of digging varies every year based on the water table , but is always at least 2 m above as required.	
45	The Applicant must ensure that the Process Water Dam is designed and constructed in a manner that satisfies the design and construction criteria for the Process Water Dam as developed under the Surface Water Management Plan (see condition 42(b) above).	Surface Water Management Plan, 2022 (DA 267-11-99 MOD 4)	Process water dam meets the requirements of the Surface Water Management Plan.	Compliant
46	The Applicant shall prepare a Noise Management Plan as part of the EMP. The Noise Management Plan shall: (a) identify existing and potential noise sources and their relative contribution to noise impacts from the development; (b) specify appropriate intervals for noise monitoring to evaluate, assess and report noise emission levels due to construction and normal operations of the development under prevailing weather conditions; (c) outline the methodologies to be used, including justification for monitoring intervals, weather conditions, seasonal variations, selecting locations, periods and times of measurements, the design of any noise modelling or other studies, including the means for determining the noise levels emitted by the development;	Operational and Road Noise Management Plan 2023, by Muller Acoustic Consulting (MAC): Operational Noise Management Plan (Condition 46); Road Noise Monitoring Plan (Condition 51) are included in this report: also, Annual Noise Monitoring Assessment Reports; latest November 2025.	– (i) all conditions have been met and verified in the previous Audits.	Compliant

	(d) specify measures to be taken to document any higher level of impacts or patterns of temperature inversions, and detail actions to quantify and ameliorate enhanced impacts if they occur; (e) provide details of noise amelioration measures, including measures to be used to reduce the impact of intermittent, low frequency and tonal noise (including truck reversing alarms) and reactive management responses for particular noise sources; and (f) contingency measures to be implemented should noise complaints be received. (g) provision for the notification of adjoining property owners of the commencement and duration of works adjoining the boundary; (h) construction of temporary noise shielding to residences affected by short-term noise impacts, including the bund recommended under Modification 2, and include an assessment of the effectiveness of this measure in reducing noise levels; and (i) include a noise reduction strategy for typical operations to ensure the noise levels from these operations do not exceed the noise criteria specified in Condition 47. The Applicant shall implement the approved management plan as approved from time to time by the Secretary.			

47	For typical operations, noise from the premises must not exceed: ● an LAeq,15 min noise emission criterion of 43 dB(A) (7am to 6pm) Monday to Saturday; ● an LAeq,15min noise emission criterion of 40 dB(A) (6am to 7am) Monday to Saturday; and ● an LA1,1min noise emission criterion of 50dB(A) (6am to 7am) Monday to Saturday. Noise generated by the development is to be measured in accordance with the relevant requirements of the *NSW Industrial Noise Policy* (as may be updated from time to time). However, these criteria do not apply if the Applicant has an agreement with the owner/s of the relevant residence or land to generate higher noise levels and the Applicant has advised the Department in writing of the terms of this agreement.	Operational and Road Noise Monitoring Assessment by MAC 2023; also, Annual Road Noise Monitoring Reports; latest November 2025.	Noise monitoring confirmed that noise levels from the quarry were consistently below the criteria, even after the EPA added more noise monitoring points in June 2023.	Compliant
47(a)	The excavator to be used is to be fitted with acoustic mufflers to achieve a noise level of approximately 76dB(A) when measured at 7 metres.	Sound Power Testing of the Komatsu excavator at Hodgson Sand Quarry, 4 June 2018 by MAC consulting. Volvo Loader and CDE plant also measured.	The excavator in question is a PC350 Komatsu that had a sound level of 101dBA, which is compliant at 7 m distance. Another excavator (Komatsu 400), was under repair and once re-commissioned the Sound Power level will be re-checked).	Compliant
47(b)	The on-site generator is to be fitted with an	The site inspection noted that no	The generator is kept in a	Compliant

	acoustic enclosure to ensure that noise levels less than 44dB(A) at 30m are achieved.	generator was in use.	shed and is rarely, if ever, used. No reference to it in the latest Annual Report.	
47(c)	A noise compliance investigation is to be undertaken within one month of the installation of the equipment to demonstrate compliance with the noise level limits stated in Conditions 47(a) and 47(b). The results of the compliance investigation are to be provided for the approval of the Secretary within 14 days of the completion of the investigations.	Noise monitoring assessments for compliance are conducted annually by Muller Acoustic Consulting (MAC). Noise Monitoring Report 2025 is the most recent one.	The noise emissions measured from the quarry, including from equipment noise, met were below EPA EPL licence limits and Consent limits.	Compliant
47(d)	The Applicant must ensure works associated with atypical operations, as described in Modification 2, only occur: (a) for a maximum of 24 days in a year, and only between 8 am to 5 pm on those days, Monday to Saturday; (b) after an investigation of options for avoiding multiple atypical operations at any one time so as to limit noise levels at affected receptors, and the outcomes of this investigation are detailed in the Noise Management Plan; and (c) at least 24 hours after notifying potentially affected receptors, with such notification to include information on the duration and extent of works, the likely noise to be experienced, and a contact telephone number.	This was discussed during the site interview.	There were no atypical conditions as described under Modification 2, during the current Audit.	Compliant
48	The Applicant shall ensure that traffic noise from the development does not exceed (L Aeq(1 hr)) 55 dB(A) between 7 am and 10 pm	MAC Noise assessments have been reported up to the end of 2025 and are also given in the Compliance	Noise monitoring conducted for traffic generated noise met all relevant noise criteria.	Compliant

	and 50 dB(A) between 10 pm and 7 am at any affected residence under adverse weather conditions. Where ambient Leq levels already exceed these criteria, the Applicant shall ensure that traffic noise from the development does not result in an increase of more than 2 dB(A). Note: *Adverse weather conditions means in the presence of winds up to 3 metres per second and/or temperature inversions of up to 4 degrees C per 100 metres*.	Report and Annual Review (March 2025).		
49	The Applicant shall prepare a Road Noise Management Plan as part of the EMP. The Plan shall document measures to be taken to meet the criteria, including a monitoring, reporting and response program; and methods for educating drivers in the reduction of road noise impacts. The Applicant shall implement the approved management plan as approved from time to time by the Secretary.	NSW EPA varied the licence to add more noise monitoring points in June 2023 although these additional requirements have been included in the Noise Management Plan 2023 but has not yet been formally approved by the DPIE.	The Road Noise Management Plan is included in the latest Compliance Report and Annual Review (March 2025) and in the Operational and Road Noise Management Plan,	Compliant.
50	The Applicant must ensure that truck movements associated with the development do not exceed 70 outbound and 70 inbound per day and does not exceed 10 outbound and 10 inbound per hour.	The maximum number of truck movements per day inbound or outbound has never reached 70 truck movements each way; a maximum of 20 truck movements (in or out) was recorded 04/09/2024 and the average is 16 movements per day.	These truck movement numbers are tabulated in the annual Compliance Report and Annual Reviews, including the latest one (March 2025)	Compliant
50A	The Applicant must prepare a Traffic Management Plan that must: (a) be prepared by suitably qualified and	A Traffic Management Plan (TMP) by Pavey Consulting Services was released on 22/11/2022	This was a non-compliance in the 2023 Audit however the issues have been rectified and	Compliant

	experienced person(s) whose appointment has been endorsed by the Secretary; (b)be prepared in consultation with TfNSW and Council; (c) include a Drivers' Code of Conduct that contains procedures to ensure that drivers: (i) adhere to posted speed limits or other required travelling speeds; (ii) adhere to designated transport routes; (iii) implement safe and quiet driving practices; and (iv) minimise potential conflict with school buses. (d) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct; and (e)propose measures to minimise the transmission of dust and tracking of material onto the surface of public roads from vehicles exiting the site. The Applicant must submit the Traffic Management Plan for the approval of the Secretary by the 31 October 2021, or as otherwise agreed by the Secretary. The Applicant must implement the Traffic Management Plan as approved.	a) David Pavey was endorsed by the Secretary of the Department of Planning and Environment b) Hills Shire Council were consulted and their comments were included in the TMP c) The Drivers Code of Conduct was developed and implemented as required in the planning conditions d) The Drivers Code of Conduct signed by individual drivers and the authorised representative of Hodgson Quarries and Plant Pty Ltd e) This information is contained in the Traffic Management Plan	are being complied with. Most drivers accessing the quarry are regulars who are well versed in the TMP requirements. The TMP has also been endorsed and signed by two other local sand mining quarry companies (Dixon Sand Pty Ltd and P.F. Formation Pty Ltd).	
51	The Applicant shall pay to Council a contribution under Section 94A of the Act at the rate of $0.65 per tonne of all extracted/	Section 94 contribution is now called Section. 7.11 (since 2023) and is $1.10 per tonne (Index linked) of	The Hills Shire Council Report Contributions Plan No.6 Extractive Industries (2023)	Compliant

	processed material transported from the subject site. The following conditions apply to the payment of this contribution: (A) The contribution will be calculated and paid monthly from the date of this Consent; (b)The contribution will be indexed and adjusted annually as from the date of Consent, in accordance with the Consumer Price Index. This adjustment will be applicable to each financial year for the duration of this Consent and shall take effect from and including July each year, commencing 1 July 2000; (c) On or before the fourteenth day of each month for the duration of the Consent, the Applicant shall deliver to Council weighbridge records showing the true quantities of extracted/processed material transported from the property during the immediately proceeding month and the Council will then, as soon as it can conveniently do so, issue an invoice to the Applicant, to be paid within fourteen days; (d)The Council has the right to inspect and have the original records relating to any extraction/processing material, including numbers and types of laden trucks, trailers and load quantities transported from the property audited, at any time when Council makes a written request to do so; The Council will pay all the said contribution	all extracted/processed material transported from the Maroota site.	confirms the $1,10 per tonne contribution from Maroota and two other local sand quarries and not $0.65 per tonne due to cost of living increases.	

	payments into a specially identified account for payment towards the rehabilitation, restoration, repair and/or maintenance of Old Northern and Wisemans Ferry Roads within the Baulkham Hills Shire boundary. Note: *This condition has been imposed in accordance with Council's Contributions Plan No. 6 – Extractive Industries. A copy of this plan may be inspected at the Customer Service Centre, Council's administration Complex, corner of Carrington and Showground Roads, Castle Hill, between the hours of 8:30 am and 4:30 pm weekdays.*			
52	***Deleted***			***Deleted***
53	The Applicant shall not clear the strip of remnant vegetation along the southern fence line (Old Northern Road) and the vegetation to the north of the site entrance (Roberts Road) containing Blue Mountains Mahogany (Eucalyptus notabilis). This area shall be fenced off to prevent vehicles entering the area.	Seen during the site inspection.	The remnant vegetation strip is intact and appears healthy.	Compliant
54	In construction of the bund walls at the corner of Roberts Road and Old Northern Road, the Applicant shall minimise disturbance to existing native vegetation.	Seen during the site inspection.	This Condition needs to be reviewed in light of comments (16/04/2026 and raised during previous Audits of 2020 and 2023, from the Hills Shire Council, which stated, *the provision and maintenance of bunding and landscape screening around the site and resultant visual impact from external properties.* These comments	Non-compliance

			should be considered a trigger to expand the area of cover by planting of local native vegetation to improve the visual aspect.	
55	The Applicant shall prepare a Flora and Fauna Management Plan as part of the EMP. The Plan shall be prepared in consultation with National Parks and Wildlife Service and Council, and shall: (a) describe the characteristics and location of species, populations and communities that the proposal may impact upon; consider the feasibility and practicality of salvaging trees removed for the development for relocation to conserved or rehabilitated areas, for the purposes of reconstructing habitat for ground fauna (c) contain a program for the active management and maintenance of all conserved and rehabilitated vegetation (as detailed in the EIS and required under this Consent) including consideration of: • post-extraction land use objectives for the site; • utilisation of local endemic species or species naturally occurring in the Maroota area; • planting around the conservation area to further buffer this area and enhance its long term viability as a bushland ecosystem;	The Flora and Fauna Management Plan by VGT Pty Ltd of 2017 and Compliance Report and Annual Review (March 2025) Section 6.9 addresses these requirements. The OEH NPWS were consulted in 2025 but did not respond. Hills Council comments were included.	The Flora and Fauna Management Plan (2017) was approved by the DPE. NPWS did not submit a response.	Compliant

	• connection of existing areas and future areas of revegetation to form a network of wildlife corridors throughout site and to adjoining lands to facilitate species recruitment through natural immigration; • provision of rocks of varying sizes to provide refuge and basking sites for herpetofauna; • fencing of revegetated areas to prohibit grazing by stock; and • provision of artificial nest boxes for a range of arboreal fauna. (d)mitigation measures to be implemented should operations compromise the significant flora and fauna communities identified in the EIS; (e)an ongoing monitoring program of the existing and proposed revegetated areas to assess their floristical structure and diversity, resilience and robustness to disturbance, and fauna species diversity. The information obtained from the monitoring shall be used to guide future revegetation and management efforts; and (f) include detailed performance and completion criteria for evaluating the performance of the flora and fauna management measures and			

	rehabilitation of the site, including triggers for any necessary remedial action.			
56	The Applicant shall maintain the revegetated areas for the duration of the Consent. Maintenance may include: ● replanting failed or unsatisfactory areas ● repairing erosion problems ● fire management – fire suppression or fire encouragement ● pest and weed control ● control of feral animal populations ● maintain and repair fencing ● fertiliser application ● watering plants in drier areas, especially in the ● establishment phase ● application of lime or gypsum to control pH and ● improve soil structure.	Observed during site inspection.	Generally, there was healthy growth in revegetated areas. Further planting is recommended in areas mentioned by the Hills Shire Council in Condition 54 above to improve the visual impact.	Compliant
57	If, during the development, the Applicant becomes aware of any heritage or archaeological material, all work likely to affect the material shall cease immediately and the relevant authorities consulted about an appropriate course of action prior to recommencement of work. The relevant authorities may include NPWS, the Heritage Office, and the Local Aboriginal Land Councils. Any necessary permits or	Nothing was observed during the site inspection.	No heritage or archaeological material identified.	Compliant

<table>
<tr><td></td><td>consents shall be obtained and complied with prior to recommencement of work.</td><td></td><td></td><td></td></tr>
<tr><td>58</td><td>The Applicant shall rehabilitate the site in a manner that is consistent with the final landform designs in Appendix 1 to the satisfaction of the Secretary. All rehabilitation must comply with the objectives in Table 1
<table>
<tr><th>Feature</th><th>Objective</th></tr>
<tr><td>Site (as a whole)</td><td>• Safe, stable and non-polluting
• Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and
minimising visual impacts when viewed from surrounding land</td></tr>
<tr><td>Surface Infrastructure</td><td>• Decommissioned and removed,
unless the Secretary agrees otherwise</td></tr>
<tr><td>Quarry Pit Floor</td><td>Landscaped and revegetated using improved pasture species, native trees
and understorey species</td></tr>
<tr><td>Final Void</td><td>• Minimise the height and slope of batters
• Minimise the drainage catchment</td></tr>
</table></td><td>Landscape and Rehabilitation Plan (2018), plus observations during site inspection.</td><td>The Landscape and Rehabilitation Plan (2018) was developed and is being implemented. This information is being reported annually in the Compliance Reports and Annual Reviews, including the current one. Rehabilitation is ongoing. Regular weed inspections too,</td><td>Compliant</td></tr>
</table>

	<table><tr><td>Community</td><td>• Ensure public safety • Minimise the adverse socio-economic effects of quarry closure</td></tr><tr><td>Water Quality</td><td>● Water retained on the site is fit for the intended post-mining land use/s ● Water discharged from the site is suitable for receiving waters and fit for aquatic ecology and riparian vegetation</td></tr></table>			
59	The Applicant shall rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilisation measures must be implemented where reasonable and feasible to control dust emissions in disturbed areas that are not active and which are not ready for final rehabilitation. Note: It is accepted that parts of the site that are progressively rehabilitated may be subject to further disturbance in future.	Site meetings and site inspection observations.	As mentioned under Condition 59 above, rehabilitation is being progressively implemented as areas become available.	Compliant
60	The Applicant shall prepare a Landscape and	Landscape and Rehabilitation for	This was a non-compliance	Compliant

	Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval by 30 June 2017, unless otherwise agreed by the Secretary; (b) provide details of the conceptual final landform and associated land uses for the site; (c) describe the short, medium and long-term measures that would be implemented to ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent; (d) include a detailed description of the measures that would be implemented over the next 3 years (to be updated for each 3-year period following the 3 years covered by the initial approval of the plan) including the procedures to be implemented for: ● maximising the salvage of environmental resources within the approved disturbance area for beneficial reuse; ● protecting vegetation and fauna habitat outside the ● approved disturbance area on-site; ● minimising the impacts on native fauna; ● landscaping the site to minimise visual and lighting impacts; ● reviewing improved pasture species	the Maroota Sand Quarry was published on 16/03/2018.	in the 2023 EIA due to the Landscape and Rehabilitation Plan not being done every three years as required under Consent 267-11-99 MOD4 requirements. This has now been rectified as the Landscape and Rehabilitation Management Plan (LRMP) was updated in July 2023, although no approval response has yet been received from the Department.	

	and application ● rates; ● controlling weeds and feral pests; ● controlling erosion; ● controlling access; and ● bushfire management; (e) include a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria; (f) include a mass balance calculation to ensure that appropriate volumes of material are available to implement the final landform as described in this plan; (g) provide for the construction and maintenance of the process water dam in accordance with the approved design and construction criteria (see Condition 42(b)); (h) identify the potential risks to the successful rehabilitation of the site, and include a description of the contingency measures that would be implemented to mitigate these risks; and (i) include details of who would be responsible for monitoring, reviewing, and implementing the plan. The Applicant shall implement the management plan as approved from time to time by the Secretary			
61	By 31 December 2017, the Applicant shall lodge a Conservation and Rehabilitation Bond with the Department to ensure that the	Discussed at site meeting.	This was a non-compliance identified at the 2023 EIA, however it has since been	Compliant

	management of biodiversity and the rehabilitation of the site are implemented in accordance with the performance and completion criteria set out in the Flora and Fauna Management Plan and Landscape and Rehabilitation Plan. The sum of the bond shall be determined by: calculating the cost of rehabilitating the site taking into account the likely surface disturbance over the following 3 years of quarrying operations; and (b) employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary. Note: If the rehabilitation of the site is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.		rectified as the bond was agreed and approved on 18/12/2023 and since been lodged.	
62	Within 3 months of each Independent Environmental Audit (see Condition 70), the Applicant shall review, and if necessary, revise the sum of the Conservation and Rehabilitation Bond to the satisfaction of the Secretary. This review must consider the: (a) effects of inflation; (b)likely cost of rehabilitating the site (taking into account the likely surface disturbance over the next 3 years of the development); and	Auditor was advised at the site meeting that the sum required to be paid in the Conservation and Rehabilitation has been submitted.	The Conservation and Rehabilitation Bond has been lodged.	Compliant

	(c) performance of the implementation of the rehabilitation of the site to date.			
63	The Applicant shall prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval by 30 June 2016; (b) provide the strategic framework for environmental management of the development; identify the statutory approvals that apply to the development; (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (e) describe the procedures that would be implemented to: ● keep the local community and relevant agencies informed about the operation and environmental performance of the development; ● receive, handle, respond to, and record complaints; ● resolve any disputes that may arise during the course ● of the development; ● respond to any non-compliance;	An Environmental Management Strategy Report for the Maroota Sand Quarry was produced in 2018 by VGT Environmental Compliance Solutions Pty Ltd.	This meets requirements.	Compliant

	● respond to emergencies; and ● include: ● copies of any strategies, plans and programs approved under the conditions of this consent; and ● a clear plan depicting all the monitoring required to be carried out in relation to the development. The Environmental Management Strategy is to include a copy of the sequence of extraction as updated under Modification 2, with all dam areas on the site clearly labelled and described. The Applicant shall implement the approved strategy as approved from time to time by the Secretary			
64	The Applicant shall assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in this Consent. Any exceedance of these criteria and/or performance measures constitutes a breach of this Consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must, at the earliest opportunity:	Discussed at site meeting.	Exceedances of dust criteria are recorded and reported. The few exceedances recorded from time to time are almost always generated outside the quarry, local grass or bush fire and in one instance a fallout of dust which originated in South Australia. Given that the quarry site was not the cause of any of the rare	Compliant

	(a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department describing those options and any preferred remediation measures or other course of action; and (c) implement remediation measures as directed by the Secretary, to the satisfaction of the Secretary.		exceedances they should not be given a non-compliance.	
65	The Applicant shall ensure that the management plans required under this Consent are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data; (b) a description of: ● the relevant statutory requirements (including any relevant approval, licence or lease conditions); ● any relevant limits or performance measures/criteria; ● the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) a description of the measures that would be implemented to comply with	An overview of this Condition was discussed at the site meeting.	A comprehensive range of Management Plans have been prepared and submitted as required and provide a good historical data base.	Compliant

	the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: ● impacts and environmental performance of the ● development; ● effectiveness of any management measures (see c above); (e)a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: ● incidents; ● complaints; ● non-compliances with statutory requirements; and ● exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.			

66	By the end of March each year (or as otherwise agreed by the Secretary), the Applicant shall review the environmental performance of the development for the previous calendar year to the satisfaction of the Secretary. This review must: a) describe the development (including any rehabilitation) that was carried out in the past calendar year, and the development that is proposed to be carried out over the current calendar year; b) include a comprehensive review of the monitoring results and complaints records of the development over the past year, which includes a comparison of these results against the: a. relevant statutory requirements, limits or performance measures/criteria; c) monitoring results of previous years; and d) relevant predictions in the EIS, Modification 1 and e) Modification 2; f) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; g) identify any trends in the	The Annual Review and Compliance Reports (most recent March 2025), meet requirements (a) – (f).	(a) Section 3 Introduction and Rehabilitation is described in Section 6.10. (b) Section 6. Proposed development and any rehabilitation planned is found in Section 6.10.4. (c) Conditions Compliance is found in Section 2; actions to address previous non-compliances are in Sections 2.1 and 2.2. (d) Sections 6.3 – 6.10 identify monitoring data and trends in each sector.	Compliant

	monitoring data over the life of the development; h) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and i) describe what measures will be implemented over the next year to improve the environmental		(e) Section 6 Environmental Management. (f) Opportunities for improvement and measures to be implemented are in Section 8.	
67	Within 3 months of the submission of: a) an annual review under Condition 66 above; b) an incident report under Condition 68 below; c) an audit report under Condition 70 below; or d) any modification to the conditions of this Consent (unless the conditions require otherwise), the Applicant shall review, and if necessary, revise the strategies, plans, and programs required under this Consent to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review, unless the Secretary agrees otherwise,		This non-compliance was reviewed since the 2023 EIA and confirmed by Lisa Thomson of VGT P/L. There has been no modification to the Conditions of the Development Consent since the previous Audit in 2023. At that time a non-compliance was given for this condition due to reviews not being completed within three months. This issue was closed off on 26/07/2023.	Compliant

	the revised document must be submitted to the Secretary for approval. Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.			
68	The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing via the Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.		This condition was added in MOD4 of DA 267-11-99 in 2021. In the 2023 EIA a non-compliant rating was given based on an exceedance of dust PM2.5 criterion for a grass fire was not reported to the Department as required. This Auditor is aware that most, if not all exceedances are generated outside the quarry site, e.g., a dust storm in South Australia in 2025, blew as far as Maroota and was beyond the control of the quarry. In such situations should the quarry be exempt from a non-compliance rating? Such data can still be reported to the Department via the Major Projects Portal, if necessary.	Compliant
68A	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The	No on-site non-compliances have been identified since the previous EIA in 2023.	See my comments in Condition 68 above. All non-compliances that are	Compliant

	notification must be in writing via the Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.		generated on-site should be reported as required and off-site occurrences can still be recorded but should not considered a non-compliance in my view.	
69	The Applicant shall provide regular reporting on the environmental performance of the development on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this Consent.	All reporting is found in: - https://www.vgt.com.au/hodgsons	The VGT Hodgsons website is very comprehensive and meets this condition and includes: - ● Compliance Reports and Annual Reviews, ● Current Planning Consent, ● Environmental Assessments, ● EMP Approvals, ● Independent Environmental Audits, ● Environmental Management Plans, ● Environmental Management Sub-plans, ● Monitoring	Compliant

			Results (Biodiversity), ● Monitoring Results (Noise), Monitoring Results (Climate, Dust, Water).	
70	Every 3 years from the date of this consent and at the completion of works under this consent, unless the Secretary directs otherwise, the Applicant shall commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: a) be 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 assess whether it is complying d) with the requirements in this Consent and any relevant EPL (including any assessment, plan or program required under these approvals); e) review the adequacy of strategies, plans or programs required under the abovementioned approvals; and	This 2026 EIA commenced on 26 March 2026 and is within the required 3-year limit from the previous Audit.	The Independent Environmental Audit 2023 conducted by James Hart Consulting and the current 2026 Audit timing have been conducted within the 3-year limit.	Compliant

	f) recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under the abovementioned approvals. Note: This audit team must be led by a suitably qualified auditor and include experts in any field specified by the Secretary.			
71	Within 6 weeks of the completion of this audit, unless the Secretary agrees otherwise, the Applicant shall submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.	The previous Independent Environmental Audit at Hodgsons Sand Quarry Maroota was done by James Hart Consulting. The Audit began on 28 March 2023 and the final report was submitted on 5 May 2023. DA 267-11-99.	The Audit met this Condition.	Compliant
72	By 30 June 2016 the Applicant shall: (a) make copies of the following publicly available on its website: ● the documents identified in Condition 2(a) above; ● current statutory approvals for the development; ● approved strategies, plans and programs required ● under the conditions of this Consent; ● a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications	These will be found on: - https://www.vgt.com.au/hodgsons	See the comprehensive list of reports found on the website under Condition 69 above.	Compliant

	in any conditions of this Consent, or any approved plans and programs; ● a complaints register, which is to be updated ● monthly; ● the annual reviews of the development (for the last 5 ● years, if applicable); ● any independent environmental audit of the ● development, and the Applicant's response to the ● recommendations in any audit; ● any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary			

6. Appendices

Appendix A – Declaration of Independence Form Template

Declaration of Independence - Auditor

Project Name INDEPENDENT AUDIT OF H.B. MAROOTA PTY/LTD

Consent Number DA 267/11/99

Description of Project EXTRACTIVE ACTIVITIES; CRUSHING, GRINDING OR SEPARATING ACTIVITIES

Project Address CNR ROBERTS & OLD NORTHERN ROADS, MAROOTA NSW 2756

Proponent MR MARTIN HODGSON (HODGSON QUARRIES AND PLANT PTY LTD)

Date 17 FEB. 2026

I declare that:

i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child;

ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child;

iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit;

iv. I am not an Environmental Representative for the project; and

v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow 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)

Name of Proposed Auditor KIERAN HORKAN

Signature

Qualification B.Sc., Dip.Ind.Micro., M.Sc., CERTIFIED ENVIRONMENTAL MANAGEMENT SYSTEM AUDITOR, EXEMPLAR GLOBAL

Company ORGANIZED RHYME ENVIRONMENTAL CONSULTANCY
ABN 53 480 041 282

Environment Protection Licence # 6535

<table>
<tr><th>Cond. No.</th><th>Condition</th><th>Evidence</th><th>Finding and Recommendations</th><th>Compliance rating</th></tr>
<tr>
<td>A1.1</td>
<td>This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation.

Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition.
<table>
<tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr>
<tr><td>Crushing, grinding or separating</td><td>Crushing, grinding or separating</td><td>> 100000 - 500000 T annual processing capacity</td></tr>
<tr><td>Extractive activities</td><td>Land-based extractive activity</td><td>> 100000 - 500000 T annual capacity to extract,</td></tr>
</table>
</td>
<td>Compliance Report and Annual Review, 2022.

Compliance Report and Annual Review, 2023.

Compliance Report and Annual Review, 2024.</td>
<td>Stockpiled material < 10,000T
Year Production EPL Limit
2022 75,054t 480,000t
2023 71,413t 480,000t
2024 51,499t 480,000t

VENM/ENM
2022 6,632t 320,000t
2023 22,234t 320,000t
2024 117,434t 320,000t</td>
<td>Compliant</td>
</tr>
</table>

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
	process or store			
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.		No non-compliances identified as per this condition.	Compliant
L1.1	Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.		No water pollution has been recorded.	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
L2.1	Noise from the premises must not exceed the sound pressure level expressed as LA10 (15 minute) of 45 dB(A), except as expressly provided by this licence.	Noise Monitoring Assessment Hodgson Quarries and Plant Pty Ltd. Annual Noise Monitoring Assessment, December 2023. Annual Noise Monitoring Assessment, October 2024. Annual Noise Monitoring Assessment, November 2025.	Noise monitoring assessments were consistently below the criteria limits.	Compliant
O1.1	Licensed activities must be carried out in a competent manner. This includes: a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and b) the treatment, storage, processing, reprocessing, transport and disposal of waste generated by the activity.	Site Inspection of the site storage shed revealed a potential risk of a fuel spill or even a fire due to poor storage conditions. In addition, some waste scrap and tyres at various points around the site could be reduced in quantity or removed. This issue is being attended to by recycling/reconditioning companies and should help reduce the issue gradually.	During the current audit, it was found that oils and chemicals had been stored in unbunded locations however the oil drum in this area was apparently empty but should be removed from the shed for recycling ASAP. **Recommendation Updated since site visit:** All chemical and oil drum containers must always be stored in a bunded area and empty containers should be removed from the shed for recycling. Waste tyres and unused scrap material stored on site area should be removed more regularly by the licenced contractors that currently do	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
			the job. Consider reducing the quantity of containers in the shed to ensure that all storage can be managed within the existing bunded facility or adding more bunding should the need arise to meet the storage limit compliantly. Ongoing but being dealt with.	
O2.1	All plant and equipment installed at the premises or used in connection with the licensed activity: a) must be maintained in a proper and efficient condition; and must be operated in a proper and efficient manner.	Records of Maintenance Work available on site. See Table 38 of Compliance Review and Annual Report 2024, for example.	Records are available on site and in reports verifying that equipment is being maintained.	Compliant
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises	During the site Inspection the water cart was in use on roads.	Water cart used for suppressing potential traffic or wind generated dust. Water sprays provided for stackers to prevent dust generation during stockpiling. No dust was observed on the day of the audit inspection. Dust deposition monitoring results show dust generation is adequately controlled.	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
O3.2	All loaded trucks entering or leaving the premises must have their loads covered.	Site inspection	Verified during site inspection by observing a loaded truck entering the site with VENM.	Compliant
O4.1	The licensee must prevent any tracking of mud on to public roads by vehicles leaving the premises.	Site inspection was undertaken during dry weather and there was no sign of mud being tracked offsite.	The quarry road infrastructure includes a pebble road to the weighbridge with concrete between weighbridge and road to minimise offsite migration of dust. No mud was being tracked offsite on the day of audit.	Compliant
M1.1	The results of any monitoring required to be conducted by this licence or a load calculation protocol must be recorded and retained as set out in this condition.	https://www.vgt.com.au/hodgsons	Monitoring results are well documented and published on the VGT project website and are readily available.	Compliant
M1.2	All records required to be kept by this licence must be: a) in a legible form, or in a form that can readily be reduced to a legible form; b) kept for at least 4 years after the monitoring or event to which they relate took place; and produced in a legible form to any authorised officer of the EPA who asks to see them	https://www.vgt.com.au/hodgsons	Monitoring results are documented and published on the project website with some records going back at least seven (7) years.	Compliant
M1.3	The following records must be kept in respect of any samples required to be collected for the purposes of this licence: a) the date(s) on which the sample was	Various records support this condition, including Chain-of-Custody Forms from NATA Accredited Labs, e.g., Coleman Adams Environmental &	Monitoring reports include required information as well as in Compliance Review and Annual Reports.	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
	taken; b) the time(s) at which the sample was collected; c) the point at which the sample was taken; and d) the name of the person who collected the sample.	Eurofins for water samples.		
M2.1	The licensee must keep a legible record of all complaints made to the licensee or any employee or agent of the licensee in relation to pollution arising from any activity to which this licence applies.	Hodgsons Quarries Complaints Register has been maintained for over a decade and no complaints have ever been received.	Complaints Register maintained and published on the VGT project website. No complaints have been received	Compliant
M2.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and if no action was taken by the licensee, the reasons why no action was taken.	Hodgsons Quarries Complaints Register Date published annually.	No complaints have been received Complaints forms over several years sighted by the Auditor and verified.	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
M2.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Hodgsons Quarries Complaints Register Date published annually.	Complaints Register (January 2011 to April 2026) maintained and published on the project website. No complaints have been received.	Compliant
M2.4	The record must be produced to any authorised officer of the EPA who asks to see them.		Complaints Register is readily available.	Compliant
M3.1	The licensee must operate during its operating hours a telephone complaints line for the purpose of receiving any complaints from members of the public in relation to activities conducted at the premises or by the vehicle or mobile plant, unless otherwise specified in the licence.	https://www.vgt.com.au/hodgsons Site inspection.	Telephone number is displayed at site entry and on project website.	Compliant
M3.2	The licensee must notify the public of the complaints line telephone number and the fact that it is a complaints line so that the impacted community knows how to make a complaint.	https://www.vgt.com.au/hodgsons Site inspection.	Telephone number displayed at site entry and on project website.	Compliant
M.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.			Compliant
R1.1	The licensee must complete and supply to the EPA an Annual Return in the approved form comprising: 1. a Statement of Compliance, 2. a Monitoring and Complaints Summary, 3. a Statement of Compliance - Licence	The NSW EPA's Public Register is available to all to view Annual Returns which are submitted through the regulator's eConnect Portal.	Annual Returns completed via eConnect. EPA Public Register shows Annual returns had been provided annually as required.	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
	Conditions, 4. a Statement of Compliance - Load based Fee, 5. a Statement of Compliance - Requirement to Prepare Pollution Incident Response Management Plan, 6. a Statement of Compliance - Requirement to Publish Pollution Monitoring Data; and 7. a Statement of Compliance - Environmental Management Systems and Practices. At the end of each reporting period, the EPA will provide to the licensee notification that the Annual Return is due.			
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=6535&id=6535&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued	EPA Public Register confirms that Annual returns had been provided annually.	Compliant

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
R1.3	Where this licence is transferred from the licensee to a new licensee: a) the transferring licensee must prepare an Annual Return for the period commencing on the first day of the reporting period and ending on the date the application for the transfer of the licence to the new licensee is granted; and b) the new licensee must prepare an Annual Return for the period commencing on the date the application for the transfer of the licence is granted and ending on the last day of the reporting period.		Licence has not been transferred.	Not Triggered
R1.4	Where this licence is surrendered by the licensee or revoked by the EPA or Minister, the licensee must prepare an Annual Return in respect of the period commencing on the first day of the reporting period and ending on: a) in relation to the surrender of a licence - the date when notice in writing of approval of the surrender is given; or b) in relation to the revocation of the licence - the date from which notice revoking the licence operates.		Licence has not been surrendered.	Not Triggered

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
R1.5	The Annual Return for the reporting period must be supplied to the EPA via eConnect EPA or by registered post not later than 60 days after the end of each reporting period or in the case of a transferring licence not later than 60 days after the date the transfer was granted (the 'due date').	https://apps.epa.nsw.gov.au/prpoeoapp/Detail.aspx?instid=6535&id=6535&option=licence&searchrange=licence&range=POEO%20licence&prp=no&status=Issued.	The required Annual Return is submitted through the EPA's eConnect Portal within the required time limit.	Compliant
R1.6	The licensee must retain a copy of the Annual Return supplied to the EPA for a period of at least 4 years after the Annual Return was due to be supplied to the EPA.	March 2024 – March 2025 reporting period Annual Return received with no non-compliances.	Viewed by Auditor on EPA Public Register.	Compliant
R1.7	Within the Annual Return, the Statements of Compliance must be certified and the Monitoring and Complaints Summary must be signed by: a) the licence holder; or b) b) by a person approved in writing by the EPA to sign on behalf of the licence holder. Note: The term "reporting period" is defined in the dictionary at the end of this licence. Do not complete the Annual Return until after the end of the reporting period. Note: An application to transfer a licence must be made in the approved form for this purpose.	March 2024 – March 2025 reporting period Annual Return most recent.	Signed by Martin Hodgson	Compliant
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.		No environmental issues due to quarry activities have been identified.	Not Triggered

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
R2.2	The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred. (The licensee or its employees must notify all relevant authorities of incidents causing or threatening material harm to the environment immediately after the person becomes aware of the incident in accordance with the requirements of Part 5.7 of the Act).		No environmental issues due to quarry activities have been identified.	Not Triggered
R3.1	Where an authorised officer of the EPA suspects on reasonable grounds that: a) where this licence applies to premises, an event has occurred at the premises; or b) where this licence applies to vehicles or mobile plant, an event has occurred in connection with the carrying out of the activities authorised by this licence, and the event has caused, is causing or is likely to cause material harm to the environment (whether the harm occurs on or off premises to which the licence applies), c) the authorised officer may request a written report of the		No environmental issues due to quarry activities have been identified.	Not Triggered

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
	event.			
R3.2	The licensee must make all reasonable inquiries in relation to the event and supply the report to the EPA within such time as may be specified in the request.		No environmental issues due to quarry activities have been identified.	Not Triggered
R3.3	The request may require a report which includes any or all of the following information: a) the cause, time and duration of the event; b) the type, volume and concentration of every pollutant discharged as a result of the event; c) the name, address and business hours telephone number of employees or agents of the licensee, or a specified class of them, who witnessed the event; d) the name, address and business hours telephone number of every other person (of whom the licensee is aware) who witnessed the event, unless the licensee has been unable to obtain that information after making reasonable effort; e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;		No environmental issues due to quarry activities have been identified.	Not Triggered

Cond. No.	Condition	Evidence	Finding and Recommendations	Compliance rating
	f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and any other relevant matters.			
R3.4	The EPA may make a written request for further details in relation to any of the above matters if it is not satisfied with the report provided by the licensee. The licensee must provide such further details to the EPA within the time specified in the request.		No environmental issues due to quarry activities have been identified.	Not triggered
G1.1	A copy of this licence must be kept at the premises to which the licence applies.		Copy available in hard copy and electronically at the site office.	Compliant
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.		Copy available in hard copy and electronically at the site office.	Compliant
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.		Copy available in hard copy and electronically at the site office.	Compliant

Attachment 6: Water Access Licence # 24163

Water Access Licence 24163

Condition Details	WAL Requirement	Evidence	Finding/Recommendation	Compliance
MW0112-00001	The maximum water allocation that may be carried over in the account for this access licence from one year to the next water year is: A. A volume equal to 100% of the share component of the licence, or B. 1 ML/unit share of the share component of the licence.		The quarry has taken less than the annual maximum share allocation of 45 ML: 2023 10.3 ML, 2024 8.3 ML and 2025 Stu ML	Compliant
MW0036-00002	The volume of water taken in any three (3) consecutive water years from 1 July 2012 must be recorded in the logbook at the end of those three water years. The maximum volume of water permitted to be taken in those years must also be recorded in the logbook.	Annual Review and Compliance Report for Maroota Quarry DA 267-11-99 for year ending 31 Dec 2023; 31 Dec 2024 (published March 2025) and data for 2025 not yet published.	Pumping records are found in the Appendices of the Annual Review and Compliance Reports covering those years.	Compliant
MW0605-00001	Water must be taken in compliance with the conditions of the approval for the nominated work on this access licence through which water is to be taken.		No non-compliances with the conditions of the water access licence have been identified.	Complaint
MW0670-00001	Water must only be taken if there is visible flow in the water source at the location where water is to be taken:		No groundwater taken	Not Triggered

Condition Details	WAL Requirement	Evidence	Finding/Recommendation	Compliance
	A. From an off-river pool, an in-river pool, a runoff harvesting dam or an in-river dam pool, or B. From the following weirs: Maldon, Douglas Park, Menangle, Camden, Sharpes, Cobbity, Mount Hunter Rivulet, Brownlow, Theresa Park and Wallacia			
MW0013-00002	A. Water must not be taken from the Lower Hawkesbury River Management Zone of Hawkesbury and Lower Nepean Rivers Water Source when flows are in very low flow class. B. This restriction will only apply when the system that confirms when water can be taken is available on the local licensor website. C. The relevant licensor will inform the licence holder in writing of the applicable restrictions and how to access the information on its website when this system becomes operative.		Water taken from Maroota Tertiary Sands Groundwater Source and the Sydney Basin Central Groundwater Source.	Not Triggered

Condition Details	WAL Requirement	Evidence	Finding/Recommendation	Compliance
	The restriction does not apply if water is to be taken from a runoff harvesting dam or an in-river dam pool.			
MW0004-00002	From 1 July 2012, the total volume of water taken in any three (3) consecutive years under this access licence must not exceed a volume which is equal to the lesser of either: A. The sum of: I. Water in the account from the available water determinations in those 3 consecutive years, plus II. Water in the account carried over from the water year prior to those 3 consecutive years, plus III. Any net of water assigned to or from this account under a water allocation assignment in those 3 consecutive water years, plus IV. Any water recredited by the Minister to the account in those 3 consecutive water years. Or I. The share component of this licence at the beginning of the first	Annual Review and Compliance Report for Maroota Quarry DA 267-11-99 for year ending 31 Dec 2023; 31 Dec 2024 (published March 2025) and data for 2025 not yet published.	The quarry has taken less than the annual maximum share allocation of 45 ML: 2023 10.3 ML, 2024 8.3 ML and 2025 Stu ML	Compliant

Condition Details	WAL Requirement	Evidence	Finding/Recommendation	Compliance
	year in those 3 consecutive water years, plus II. The share component of this licence at the beginning of the second year in those 3 consecutive years, plus III. The share component of this licence at the beginning of the third year in those 3 consecutive water years, plus IV. Any net amount of water assigned to or from this account under a water allocation assignment in those 3 consecutive water years, plus V. Any water recredited by the Minister to the account in those 3 consecutive water years.			
MW2338-00001	The completed logbook must be retained for five (5) years from the last date recorded in the logbook.	Pumping Records 2023, 2024 and 2025.	Electronic Logbook maintained indefinitely.	Compliant
MW2337-00001	The following information must be recorded in the logbook for each period of time that water is taken:	Pumping Records 2023, 2024 and 2025.	Logbook includes required information.	Compliant

Condition Details	WAL Requirement	Evidence	Finding/Recommendation	Compliance
	A. Date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and B. The access licence number under which the water is taken, and C. The approval number under which the water is taken, and D. The volume of water taken for domestic consumption and/or stock watering.			
MW2339-00001	A logbook must be kept, unless the work is metered and fitted with a data logger. The logbook must be produced for inspection when requested by the relevant licensor.	Annual Review and Compliance Report for Maroota Quarry DA 267-11-99 for year ending 31 Dec 2023; 31 Dec 2024 (published March 2025) and data for 2025 not yet published.	Logbook maintained. Records of water take are recorded and published in the Compliance Review Annual Report.	Compliant
MW0051-00003	Once the licence holder becomes aware of a breach of any condition on this access licence, the		No breaches identified.	Not Triggered

Condition Details	WAL Requirement	Evidence	Finding/Recommendation	Compliance
	licence holder must notify the Minister as soon as practicable. The Minister must be notified by: A. Email: water.enquiries@dpi.nsw.gov.au Or B. Telephone: 1800 353 104. Any notification by telephone must be confirmed in writing within seven (7) business days of the telephone call.			

Attachment 7: Consultation Records (Planning, EPA and Council)

Gmail Kieran Horkan <kieran.horkan@gmail.com>

Customer Service Enquiry (P-1707680)

2 messages

Information Team <information@planning.nsw.gov.au> Fri, Mar 27, 2026 at 12:00 PM
To: kieran.horkan@gmail.com

Dear Kieran,

Thank you for contacting the NSW Department of Planning, Housing and Infrastructure's Customer Service team.

This is in relation to your enquiry: Independent Environmental Auditor request for information re Roberts Road, Quarry, DA 267-11-99.

Your enquiry has been received and your ticket number is P-1707680. We will attend to your enquiry as soon as possible.

Regards,

Customer Service
Department of Planning, Housing and Infrastructure

E information@planning.nsw.gov.au

Locked Bag 5022
Parramatta NSW 2124

Working days Monday to Friday, 08:30am - 05:00pm

NSW
GOVERNMENT

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

Information Team <information@planning.nsw.gov.au> Fri, Mar 27, 2026 at 2:35 PM
To: kieran.horkan@gmail.com

Good afternoon Kieran,

This is in relation to your enquiry: Independent Environmental Auditor request for information re Roberts Road, Quarry, DA 267-11-99.

Thank you for your enquiry.

I have forwarded your response to the relevant team.

They will respond directly to you. Please let us know if we can assist you further.

Regards,

Belinda
Customer Service Officer
Department of Planning, Housing and Infrastructure

E information@planning.nsw.gov.au

Locked Bag 5022
Parramatta NSW 2124

Working days Monday to Friday, 09:00am - 05:00pm

I acknowledge the traditional custodians of the land and pay respects to Elders past and present. I also acknowledge all the Aboriginal and Torres Strait Islander staff working with NSW Government at this time.

Please consider the environment before printing this email.

From: Kieran Horkan <kieran.horkan@gmail.com>
Date: Friday, March 27, 2026 12:00 PM
To: Belinda Fry <information@planning.nsw.gov.au>
Subject: Independent Environmental Auditor request for information re Roberts Road, Quarry, DA 267-11-99

Dear Planning People,

I am the appointed Independent Environment Auditor (IEA) for the required 2026 Audit assessment of Hodgsons Quarry & Plant at Roberts Road, Maroota, (Schedule 1, Condition 70 of DA 267-11-99), as modified.

Yesterday (26/03/2026), I undertook the Opening Meeting at the premises, followed by the SIte Inspection and later completed the Wrap-up meeting as required under DPIE's Independent Audit Post Approval Requirements.

I am writing to you and other regulators to enquire whether the Department is aware of any issues that may have arisen since the previous IEA in 2023, that I need to be aware of and take into account in my assessment?

Looking forward to hearing from you.

Kind Regards,

Kieran

Kieran Horkan Dip. Indust Micro., B.Sc., M.Sc.

Scientific Director

Organized Rhyme Environmental Consultancy

ABN 53 480 041 262

Gmail **Kieran Horkan <kieran.horkan@gmail.com>**

Independent Environmental Audit Request for Information re Roberts Road Quarry (Water Access Licence # 24163), DA 267-11-99

Kieran Horkan <kieran.horkan@gmail.com> Fri, Apr 3, 2026 at 10:29 AM
To: enquiries@waternsw.gov.au

Dear Water NSW People,

I am the appointed Independent Environment Auditor (IEA) for the required 2026 Audit assessment of Hodgsons Quarry & Plant at Roberts Road, Maroota, (Schedule 1, Condition 70 of DA 267-11-99), as modified. The quarry has a Water Access Licence # 24163.

I am writing to you and other regulators to enquire whether the Water NSW is aware of any issues that may have arisen since the previous IEA in 2023, that I need to be aware of and take into account in my assessment? Has Water NSW undertaken any site visits to the premises in the last three years?

Looking forward to hearing from you.

Thank you.

All the best.

Kieran

Kieran Horkan Dip. Indust Micro., B.Sc., M.Sc.

Scientific Director

Organized Rhyme Environmental Consultancy

ABN 53 480 041 262

mob +61 (0) 420 590 384

Gmail **Kieran Horkan <kieran.horkan@gmail.com>**

RE: (ECM:22515705) Fwd: Independent Environmental Auditor Request for Information re Roberts Road Quarry, Maroota, DA 267-11-99

5 messages

Kristine McKenzie <kmckenzie@thehills.nsw.gov.au> Thu, Apr 16, 2026 at 9:45 AM
To: Kieran Horkan <kieran.horkan@gmail.com>

Hi Kieran,

Thank you for the opportunity to comment on your upcoming Independent Environmental Audit in regard to DA 267-11-99.

The main issue I would raise is the provision and maintenance of bunding and landscape screening around the site and resultant visual impact from external properties. This is a matter I have raised previously with the Department of Planning and also in the previous site audits (undertaken June 2020 and March 2023). I would request that this matter be reviewed as part of your audit.

Please don't hesitate to call or email me if you wish to discuss this matter further.

Regards, Kristine

Kristine McKenzie

Principal Coordinator Development Assessment

+61298430319 | kmckenzie@thehills.nsw.gov.au

Administration Centre, 3 Columbia Court Norwest NSW 2153

PO Box 7064, NORWEST NSW 2153

www.thehills.nsw.gov.au

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From: Kieran Horkan <kieran.horkan@gmail.com>
Sent: Friday, 3 April 2026 11:46 AM
To: The Hills Shire Council <Council@thehills.nsw.gov.au>
Subject: (ECM:22515705) Fwd: Independent Environmental Auditor Request for Information re Roberts Road Quarry, Maroota, DA 267-11-99

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Dear Hills Council People,

I am the appointed Independent Environment Auditor (IEA) for the required 2026 Audit assessment of Hodgsons Quarry & Plant at Roberts Road, Maroota, (Schedule 1, Condition 70 of DA 267-11-99), as modified.

I am writing to you and other regulators to enquire whether Council is aware of any issues that may have arisen since the previous IEA in 2023, that I need to be aware of and take into account in my assessment?

Looking forward to hearing from you.

Thank you.

Kind regards.

Kieran

Kieran Horkan Dip. Indust Micro., B.Sc., M.Sc.

Scientific Director

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Kieran Horkan <kieran.horkan@gmail.com> Thu, Apr 16, 2026 at 12:40 PM
To: Kristine McKenzie <kmckenzie@thehills.nsw.gov.au>

Hi Kristine,

Many thanks for your valuable response which I will certainly take into account as I am now drafting the Independent Audit Report. I note that you raised these issues previously and I was wondering if you or your team have seen any improvement in the last three years since the previous Audit? Do Council staff do any site visits tin Maroota?

I may contact you further as the report progresses but before a draft is reviewed.

All the best.

Kieran

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[Quoted text hidden]

Kristine McKenzie <kmckenzie@thehills.nsw.gov.au> Thu, Apr 16, 2026 at 1:08 PM
To: Kieran Horkan <kieran.horkan@gmail.com>

Hi Kieran,

As the DA is a State Significant DA, it has not been Council's role to inspect the site in regard to compliance with conditions of consent. Notwithstanding this I am familiar with the area and have observed the existing operations from the adjoining public roads. In regard to any improvements over the last few years, this would be a matter for your review.

Regards, Kristine

Gmail **Kieran Horkan <kieran.horkan@gmail.com>**

RE: Independent Environmental Auditor Request for Information re. Roberts Road Quarry (EPL #6535), DA 267-11-99 [ref:!00D7F06iTix.!500Mn01M6Kbf:ref]

2 messages

Jack Snowden <jack.snowden@epa.nsw.gov.au> Thu, Apr 9, 2026 at 11:40 AM
To: Kieran Horkan <kieran.horkan@gmail.com>
Cc: Felicity Bain <Felicity.Bain@epa.nsw.gov.au>

Hi Kieran,

Thank you for the opportunity to provide comment on the 2026 Audit Assessment of Hodgsons Quarry & Plant at Roberts Road, Maroota.

At this time, the NSW EPA does not have any comments to be included in your report.

If in future you could please present this opportunity prior to your site inspection, that would be greatly appreciated.

Thanks again,

Jack Snowden

Senior Operations Officer

Operations

NSW Environment Protection Authority

T 02 8275 1094 | www.epa.nsw.gov.au

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.

Report pollution and environmental incidents 131 555 or +61 2 9995 5555

From: Environment Line <info@environment.nsw.gov.au>
Sent: Friday, 27 March 2026 1:28 PM
To: EPA Delivery Hub Mailbox <EPA.DeliveryHub@epa.nsw.gov.au>
Subject: Independent Environmental Auditor Request for Information re. Roberts Road Quarry (EPL #6535), DA 267-11-99 [ref:!00D7F06iTix.!500Mn01M6Kbf:ref]

---------- Forwarded Message ----------
From: Kieran Horkan [kieran.horkan@gmail.com]
Sent: 27/03/2026 12:35
To: info@epa.nsw.gov.au
Subject: Independent Environmental Auditor Request for Information re. Roberts Road Quarry (EPL #6535), DA 267-11-99

Dear EPA People,

I am the appointed Independent Environment Auditor (IEA) for the required 2026 Audit assessment of Hodgsons Quarry & Plant at Roberts Road, Maroota, (Schedule 1, Condition 70 of DA 267-11-99), as modified. The quarry has an Environment Protection Licence No 6535.

Yesterday (26/03/2026), I undertook the Opening Meeting at the premises, followed by the SIte Inspection and later completed the Wrap-up meeting as required under DPIE's Independent Audit Post Approval Requirements.

I am writing to you and other regulators to enquire whether the EPA is aware of any issues that may have arisen since the previous IEA in 2023, that I need to be aware of and take into account in my assessment? I understand that the EPA has undertaken some site visits to the premises in the last three years.

Looking forward to hearing from you.

Kind regards.

Kieran

Kieran Horkan Dip. Indust Micro., B.Sc., M.Sc.

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ref:!00D7F06iTix.!500Mn01M6Kbf:ref