



Dixon Sand Pty Ltd  
ABN: 80 002 278 686



# Independent Environmental Audit

of the

# Haerses Road Quarry

for the period

19 October 2022 to  
13 November 2025

*Prepared by:*



February 2026



## ACKNOWLEDGEMENT

*R.W. Corkery & Co. acknowledge and pay our respects to the Traditional Custodians of the lands in NSW and Australia on which our projects are located. We value the knowledge, advice and involvement of the Elders and extended Aboriginal community that contribute to our Projects and extend our respect to all Aboriginal and Torres Strait Islander peoples.*





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**Prepared for:**

Dixon Sand Pty Ltd  
ABN: 80 002 278 686

4610 Old Northern Road  
Maroota NSW 2756

Telephone: (02) 4566 8348  
Email: [environment@dixonsand.com.au](mailto:environment@dixonsand.com.au)

---

**Prepared by:**

**R.W. Corkery & Co. Pty Limited**  
Geological & Environmental Consultants  
ABN: 31 002 033 712

Telephone: (02) 9985 8511  
Email: [admin@rwcorkery.com](mailto:admin@rwcorkery.com)  
Postal: PO Box 1796  
CHATSWOOD NSW 2057

**Sydney | Orange | Newcastle | Townsville**

**Sydney**  
Suite 12.01, 1-5 Railway Street  
CHATSWOOD NSW 2067

**Orange**  
62 Hill Street  
ORANGE NSW 2800

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# Executive Summary

This audit report has been prepared in accordance with *Schedule 5, Condition 13* of DA 165-7-2005 for the Haerses Road Quarry and generally in accordance with the requirements of the document *Independent Audit Post Approval Requirements 2020*.

## Compliance Status

The status of compliance against the conditional components of Development Approval (DA) 165-7-2005, Environment Protection Licence (EPL) 12513, Water Access Licence (WAL) 25941 and WAL 25956 was assessed as follows.

Approval	DA 165-7-2005	EPL 12513	WAL 25941	WAL 25956
Compliant	175	54	5	5
Non-Compliant	11	3	0	0
Not Triggered	28	12	5	5
Not Determined	1	0	1	1
<b>Total</b>	<b>215</b>	<b>69</b>	<b>11</b>	<b>11</b>

The non-compliances recorded were considered principally administrative or technical in nature and related to:

- a calculated noise exceedance (undertaken using potentially overly conservative assumptions);
- the absence of water level data loggers within on-site dams;
- absence of records for truck arrival times (when unladed, with records held for laden departure times) ;
- need for update of the Biodiversity and Rehabilitation Management Plan;
- not formally reviewing management plans (and notifying the Department of the review) following submission of incident reports (despite the incident reports confirming no non-compliance);
- notifying the Department of potential incidents through submission of a formal report and not 'immediately' notifying, followed by submission of a report; and
- presence of mud on the site access road (Haerses Road).

Of potential concern is the potential extraction within Cells 1a to 2b below the approved 2023 Maximum Extraction Depth Map. Rectification of this may potentially be achieved through review, update and approval of the Maximum Extraction Depth Map and ensuring that extraction remains at or above this level unless undertaken in accordance with an approved update.

## Management Plans

A high-level review of the various strategies, plans and programs required by DA 165-7-2005 was undertaken. The plans were considered to generally meet the respective conditional requirements of DA 165-7-2005. A number of generally minor non-compliances with the implementation of some aspects of the plans were identified with recommendations made to address these non-compliances. A range of improvements have also been suggested.

## Environmental Management System and Approach to Management

The Company does not have a formal or certified Environmental Management System. Notwithstanding, the Company's informal Environmental Management System is supported by the Environmental Management Strategy and associated management plans as well as a range of registers for complaints, engagement / consultation, incidents, TEOM alarms etc, inspection checklists / records, toolbox talks, additional forms and records.

During the audit, a high degree of knowledge of environmental management matters was evident which was reflected in the condition of the site. The Company's active engagement and involvement with the local community is highly commended. The record of engagement demonstrates that engagement occurs regularly and is not restricted to CCC meetings.

Whilst a range of recommended actions have been provided to assist in maintaining compliance and improving environmental management, there is an existing proactive and collaborative approach to environmental management.

## Recommended Actions

A total of 11 compliance-based Recommendations and 18 suggested Improvements have been provided for the Company's consideration and action.

# 1. Introduction

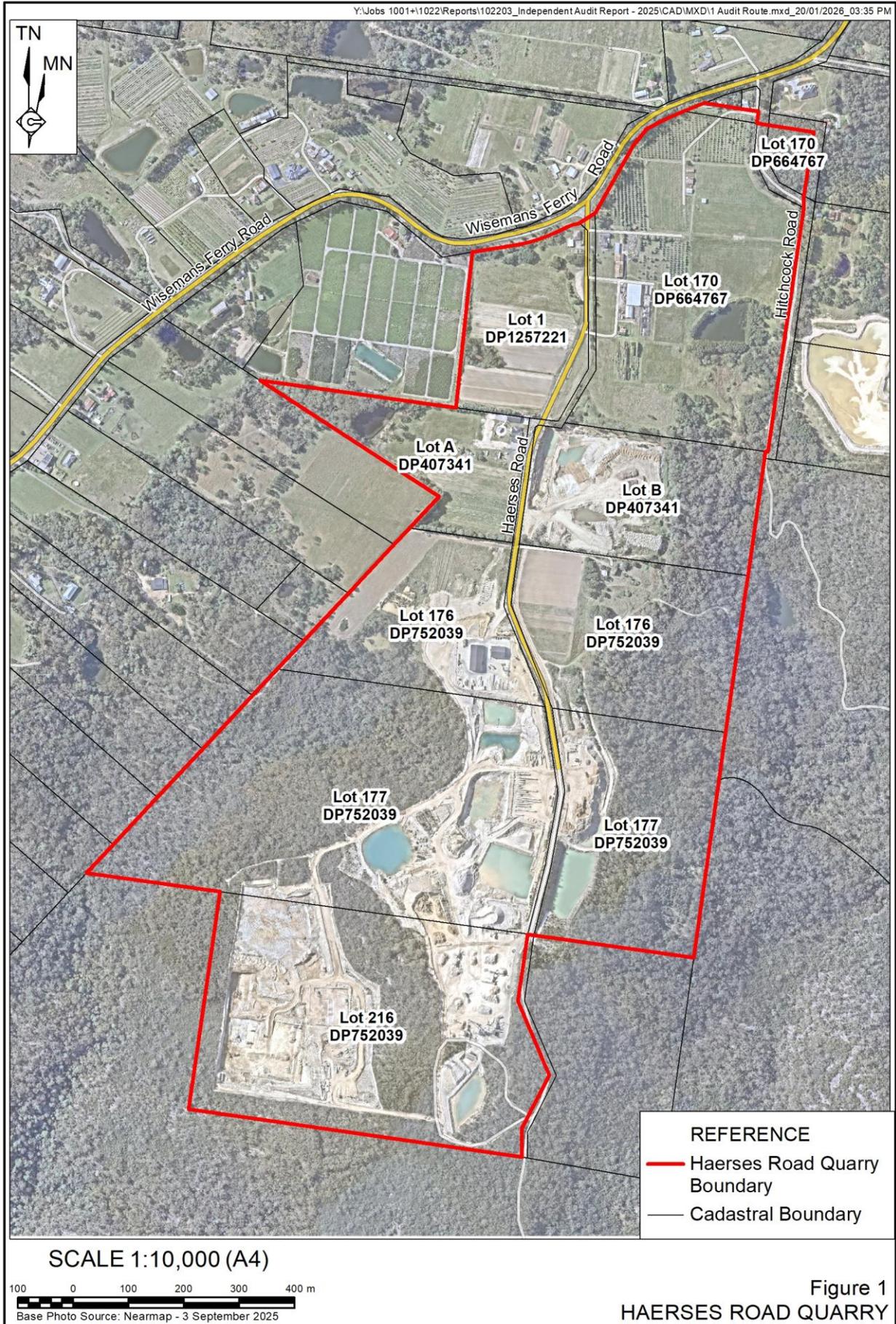
## 1.1 Project Background

Dixon Sand Pty Ltd (“the Company”) operates the Haerses Road Quarry (“HR Quarry”) (**Figure 1**) and an associated Old Northern Road Quarry (“ONR Quarry”), in Maroota, NSW, approximately 40km north of Parramatta. Component areas for the HR Quarry are generally referenced by the relevant land parcels within the Quarry Site, namely:

- Lot 170 DP 664766 (now Lot 1 DP1257221);
- Lot 170 DP 664767;
- Lots A and B DP 407341;
- Lots 176 and 177 DP 752039; and
- Lot 216 DP 752039.

Extraction commenced in the Stage 1 cell in 2006. An expansion of the extraction area was approved on 22 January 2018 following the determination of Modification 1, permitting extraction of material from Extraction Areas on Lots A and B. Modification 2 (approved January 2019) included a minor correction to figures to reflect accurate disturbance areas adjacent to the Maroota State Forest buffer area. Modification 3 (approved June 2021) included an increase in the production rate from 250,000tpa to 495,000tpa, an increase in ENM/VENM importation up to 250,000tpa, an increase in daily heavy vehicle movements from 56 per day to 180 per day, and an extension to Stage 5 of the Tertiary Extraction Area. Modification 4 (approved July 2021) included a change to the extraction sequence in the Mod 1 extraction area and a change to the assignation of credits for biodiversity offsetting purposes. Modification 5 (approved June 2022) included the relocation of the site office, workshop and weighbridge, and the introduction of sandstone cutting activities. Modification 6 (approved September 2023) included a minor modification involving the relocation of the workshop and weighbridge, and sandstone cutting activities approximately 90m further north into Lot 176) and the site office north into Lot A.

During the audit period extraction occurred within extraction Stage 1, Stage 2, Cells 1A, 1B, 2A, 2B, 3A and 3B. In October 2022, the Company commenced sand processing activities on site with processed sand products despatched directly from the Quarry to customers and continued throughout the audit period. Unprocessed sand also continued to be transferred from the HR Quarry to the ONR Quarry for processing and subsequent despatch. Silts from the washing of materials at ONR Quarry are retained in engineered structures within former extraction areas at the ONR site, with these structures progressively rehabilitated to form the ONR Quarry approved final landform. Silts from washing of materials at HR Quarry are currently stored within a previously extracted area of Stage 2 and will ultimately be utilised in final landform creation. Opportunities for progressive rehabilitation at the HR Quarry have been limited to date, with backfilling and landform creation occurring within the Stage 1 extraction area during the audit period. A range of bush regeneration and management activities were also undertaken within the Quarry Site during the audit period.



## 1.2 Scope and Audit Objectives

The objectives and scope of this independent environmental audit are to fulfil the following audit requirements for the HR Quarry.

This audit has been prepared for Dixon Sand Pty Ltd (“the Company”) in accordance with *Schedule 5, Condition 13* of DA 165-7-2005 for the Haerses Road Quarry which requires that:

*“By the end of November 2019, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission, commence and pay the full cost of an Independent Environmental Audit of the development. This audit must:*

- a) *be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*
- b) *include consultation with the relevant agencies and the CCC;*
- c) *assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);*
- d) *review the adequacy of strategies, plans or programs required under the abovementioned approvals;*
- e) *recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and*
- f) *be conducted and reported to the satisfaction of the Secretary.*

In addition to the requirements of DA 165-7-2005, this audit has been prepared generally in accordance with the requirements of the *Independent Audit Post Approval Requirements 2020*.

The Department of Planning, Housing and Infrastructure (DPHI), other government agencies, and the Community Consultative Committee (CCC) were consulted during the development of the audit scope. Further detail of this consultation is provided in Section 3.1.

This audit has been undertaken concurrently with the audit of Company’s ONR Quarry. Details of the ONR Quarry audit are provided in a separate report (Ref: 1021/03) with this audit report confined to operations associated with the HR Quarry and associated Development Consent 165-7-2005, EPL 12513 and Water Access Licences 25941 and 25956.

## 1.3 Environmental Audit Team

The environmental audit team comprised the following members who have the necessary skills and qualifications required by DPHI. A copy of DPHI's endorsement of the audit team is provided as **Appendix 1**.

- Mr Scott Hollamby – Lead Environmental Auditor  
Mr Hollamby, B.EnvSc(Hons), Senior Environmental Consultant with RWC. Mr Hollamby has 18 years auditing experience for mining, extractive and industrial operations. Mr Hollamby is certified by Exemplar Global as a Lead Auditor (Environmental Management Systems) - Registration No. 109260.  
Mr Hollamby has also been extensively involved in the assessment and preparation of environmental management documentation for mining and quarrying projects.
- Mr Sam Wells – Assisting Environmental Auditor  
Mr Sam Wells, B.EnvScMgt, Environmental Consultant with RWC. Mr Wells has 10 years of previous experience in occupational hygiene, including auditing compliance, regulatory guidance and interpretation of technical data.

The conditions of Development Consent 165-7-2005 do not specify a requirement for technical specialists, and none were requested through the agency consultation process.

## 1.4 Audit Period

The previous independent environmental audit for the HR Quarry was undertaken for the three-year period between 23 October 2019 and 18 October 2022. Therefore, the current audit addresses the three-year period between 19 October 2022 and 13 November 2025 (the date of the audit site inspection for the HR Quarry).

## 1.5 Limitations

The findings in this report are based on a site inspection on 13 November 2025, discussions with Company personnel and documentation provided prior to, during and following the inspection.

The assessment of compliance relying upon documentation has been limited to documentation that has been supplied or otherwise obtained from public sources. R.W. Corkery & Co. Pty Limited has made every endeavour to identify compliance based upon the available documentation assuming it to be authentic and that all copies of original documents are a true and accurate copy.

The site inspection was undertaken as a combination “drive over” / “walk-over” with observations made of the various features of the Quarry Site. The main components of the Quarry were observed to gain an appreciation of activities undertaken on site and the

Company's compliance with the various conditional requirements. Not all areas of the Quarry Site were inspected nor were any subsurface investigations carried out or any samples collected for analysis during or following the inspection. On this basis, it cannot be discounted that issues could exist within areas of the site not inspected.

## 2. Audit Methodology

### 2.1 Introduction

The audit was undertaken in accordance with the requirements of *Schedule 5, Condition 13* of DA 165-7-2005 and generally in accordance with the *Independent Audit Post Approval Requirements 2020*.

The following subsections outline the development of the audit plan and methodology used in undertaking the audit. The development of the audit scope and endorsement of the audit team are outlined in Sections 1.2 and 1.3 respectively.

Dixon Sand sought and received endorsement from DPHI for RWC to undertake the Independent Environmental Audit (see **Appendix 1**). A copy of the auditor's declaration of independence is provided in **Appendix 2**.

### 2.2 Audit Plan

The audit plan was compiled by RWC in consultation with Dixon Sand to outline all of the activities necessary for planning, organising and conducting the audit and involved the following.

Planning: RWC completed an initial review of the Company's website and public registers for copies of approvals, leases and licences and other relevant publicly available information. These were principally located on the Dixon Sand website. Discussions were then held with the Company's Environmental Officer to confirm the currency of documentation and the existence of any additional relevant approvals, leases and licences. It is noted that since the 2022 independent environmental audit, Dixon Sand has sought and received one modification (MOD6) of Development Consent DA 165-7-2005.

During the planning phase, relevant government agencies and the CCC were consulted to identify any specific issues that they believed the audit should address. **Table 2.1** provides a list of the government agencies / stakeholders that were consulted by email on 15 October 2025 and requested to identify any issues they considered should be addressed during the audit. Copies of responses are provided in **Appendix 3**. Each issue raised is summarised in **Table 2.1** with a cross reference to where it is addressed in this audit report.

As part of the audit preparation, the minutes from the CCC meetings held during the audit period were also reviewed. During the audit period, a total of seven CCC meetings were held (*Documents HR41-2025 to HR46-2025*). A summary of any relevant compliance, environmental or operational issues raised by the community or Council representatives during each CCC meeting are provided in **Table 2.2**.

All matters requiring review/confirmation during the site inspection were assembled in a Site Inspection Check List.

**Table 2.1**  
**Consultation Outcomes**

Agency / Stakeholder	Issues Raised	Location Addressed
DPHI	<ul style="list-style-type: none"> <li>The Independent Environmental Audit for the development to be undertaken in accordance with Schedule 5, Condition 13 and 14 of the consent.</li> <li>It is recommended that the IEA be undertaken in accordance with the <i>Independent Audit Post Approval Requirements 2020</i>.</li> <li>Ensure any issues with the dust deposition gauges are addressed.</li> </ul>	<p><i>Sections 1.2 and 2.1</i></p> <p><i>Sections 1.2 and 2.1</i></p> <p><i>Sections 3.1.3, 3.1.4, and 3.3.2.3.</i></p>
NSW EPA	<ul style="list-style-type: none"> <li>The EPA has no specific comments on the scope of the audit.</li> <li>The EPA is aware that there are ongoing self-reported issues associated with dust exceedances at both premises' air monitoring stations, however it is acknowledged there have been external factors contributing to these exceedances.</li> </ul>	-
Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group	<p>The audit to address compliance with:</p> <ul style="list-style-type: none"> <li>Water Management Plans and related sub-plans, Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface Water and Groundwater Management Plan;</li> <li>Extraction Plans and related sub-plans, Water Management Plan and Subsidence Management Plan;</li> <li>Trigger action response plans for water source impacts which set clearly defined limits and actions and reported on within annual and exceedance based reporting;</li> <li>Water supply availability is clearly defined for the project;</li> <li>Water take at the site via storage, diversion, interception or extraction is clearly documented and authorised;</li> <li>Water metering at the site, where relevant;</li> <li>Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from; and</li> <li>Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous year's; 3) identifies exceedances and how there are managed/mitigated.</li> </ul>	<p><b>Appendix 4, Section 3.3.2.4</b></p> <p><i>Not Applicable</i></p> <p><i>Sections 3.1.3, 3.1.4, and 3.3.2.4</i></p> <p><i>Section 3.3.2.4</i></p> <p><i>Section 3.3.2.4</i></p> <p><b>Appendix 4</b></p> <p><i>Section 3.2.1</i></p> <p><i>Section 3.3.2.4</i></p>
Transport for NSW	<ul style="list-style-type: none"> <li>That the audit addresses the operation of the quarries against the relevant traffic management plans / operation plans.</li> </ul>	<i>Section 3.3.2.5</i>
Hills Shire Council	<ul style="list-style-type: none"> <li>Ensure that all setback areas are marked with survey markers or similar and that works have not encroached into the setback areas.</li> <li>The maintenance of landscape screening around the site.</li> <li>That in general terms, compliance with all conditions of consent is required.</li> </ul>	<p><i>Table A4.1</i></p> <p><i>Conditions 2(2b) and 2(15)].</i></p> <p><i>Figure 1.</i></p> <p><b>Appendix 4.</b></p>
CCC	<ul style="list-style-type: none"> <li>No comments/issues were nominated.</li> </ul>	-
Resources Regulator	<ul style="list-style-type: none"> <li>No comments/issues were nominated.</li> </ul>	-
Water NSW	<ul style="list-style-type: none"> <li>No comments/issues were nominated.</li> </ul>	-
NSW DCCEEW - CPHR	<ul style="list-style-type: none"> <li>No response received.</li> </ul>	-

**Table 2.2**  
**Issues Raised in CCC Meetings Held During the Audit Period**

<b>CCC Meeting</b>	<b>Issues Raised and Location Addressed</b>
9 November 2022	<ul style="list-style-type: none"> <li>• Ongoing discussion regarding timing for school zone and follow up with R. Preston MP.</li> <li>• Requested that representations to R.Preston MP also include bigger speed signs (60km/hr) as you enter Maroota.</li> <li>• No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.</li> </ul>
3 May 2023	<ul style="list-style-type: none"> <li>• Nil response from R.Preston MP over 3 year period regarding school zone.</li> <li>• Community member raised issue of trucks still travelling too fast along Wisemans Ferry Road, but not the sand trucks.</li> <li>• No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.</li> </ul>
8 November 2023	<ul style="list-style-type: none"> <li>• No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.</li> </ul>
28 May 2024	<ul style="list-style-type: none"> <li>• Dust exceedances due to bundwall work, paddock maintenance and neighbouring farming activities at some of the dust gauges, trying to get these dust gauges removed/moved as they aren't indicative of quarry operations.</li> <li>• No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.</li> </ul>
6 November 2024	<ul style="list-style-type: none"> <li>• DPHI undertook a site inspection at both quarries. There were no issues or items of concerns identified during the audit.</li> <li>• Dust exceedances reported to EPA &amp; DPHI which was caused by nearby agricultural activities.</li> <li>• No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.</li> </ul>
7 May 2025	<ul style="list-style-type: none"> <li>• Dust exceedances are reported to EPA &amp; DPHI which are usually as a result of nearby agricultural activities. Dixon Quarry are still trying to obtain approval for some of the locations of the monitors to be relocated due to ongoing cumulative impacts from other sources</li> <li>• Predicted noise at one receiver was slightly over the noise criteria but considered negligible impact with Quarry only "intermittently just audible.</li> <li>• Complaint received by EPA on 31/3/25 regarding sediment on Old Northern Road. Quarry staff inspected access road and intersection and photographed demonstrating no sand. Community representative commented that a lot of sediment is coming from trucks and cars picking it from the road shoulder following rain events washing it onto the roads, due to poor drainage.</li> <li>• Dixon Sand to approach TfNSW (the relevant road authority) regarding maintenance.</li> </ul>
5 November 2025	<ul style="list-style-type: none"> <li>• Minutes not available at time of audit.</li> </ul>

**Document Review:** Prior to the audit inspection, an initial review of the compliance tables and electronic copies of various documentation provided by the Company and sourced from public sources was undertaken. Documentation review continued throughout the audit process with a range of documentation also reviewed during and following the audit site inspection.

Audit Site Inspection: The audit site inspection followed the opening meeting at the Company's site office (located at the HR Quarry) with the following Dixon Sand Personnel.

- Mr David Dixon – Managing Director
- Mr Jamie Baker – Business Development Manager
- Ms Hunny Churcher – Environmental Officer
- Mr Michael Munnoch – Operations Manager

All the above personnel were present during the opening meeting.

The site inspection of the HR Quarry involved a combination drive and walk over. The level of coverage provided a good overview of the Quarry Site whilst focusing on key areas required to assess compliance and gain an appreciation of the approach taken with respect to environmental management. A checklist assembled during the preparation for the audit was referred to regularly throughout the site inspection.

Thumbnails of photographs taken during the inspection are presented in **Appendix 5** and cross referenced within the audit report as *Photo E1022C\_xxx*.

During the site inspection, periods of on-site document review and verification was undertaken. A closing meeting was subsequently held at the end of the site inspection and document review with those personnel that attended the opening meeting to provide an overview of the audit observations and approach to making recommendations and suggested improvements.

Post Audit Site Inspection: A further Request for Information was made to the Company for documentation arising from the site inspection.

Report Preparation: A draft of the completed audit report was supplied to the Company to review for factual correctness and with a final request for any audit evidence. The audit report was then finalised following the receipt of the Company's review of the draft audit report.

The conduct of the audit and report preparation was undertaken generally in accordance with the audit plan.

## 2.3 Audit Evidence

The following audit evidence was used to undertake the assessments nominated in *Schedule 5, Condition 13* of DA 165-7-2005 and the *Independent Audit Post Approval Requirements 2020*.

### 1. Issues Raised by Relevant Agencies and the CCC

The issues raised by the relevant government agencies and the CCC were tabulated and considered through the assessment of environmental performance, compliance and approved strategies, plans and programs. Cross references to where the raised issues have been addressed are provided within the tabulated summary (see **Tables 2.1** and **2.2**).

2. Environmental Performance

This was assessed through a combination of:

- a review of any notices, orders, penalty notices or prosecutions;
- a review of any received complaints;
- a review of any incidents; and
- a review of relevant environmental monitoring results and audit observations against relevant criteria and/or predicted impacts.

The results of this assessment are outlined in Section 3.2. Where appropriate, recommended actions were identified (see Section 4).

3. Status of Compliance with Development Consent, EPL 12513, WAL 25941, and WAL 25956.

Statutory compliance was assessed by methodically reviewing each condition and, based either upon site observations, documentation and/or advice provided by Company representatives, determining whether compliance has been achieved during the audit period. Where documents were supplied, a document number has been assigned and cross referenced. Supplied documentation relied upon during the audit is listed in **Appendix 7**. Where documents were simply sighted on site and copies were not retained, these are referenced 'as sighted'.

All conditions outlined in Development Consent DA 165-7-2005, Environment Protection Licence 12513 and Water Access Licences 25941 and 25956 were tabulated and columns provided for compliance assessment, the basis for compliance, and comments / recommended actions (see **Appendix 4**). Where appropriate, recommended actions arising from the assessment of compliance are presented in Section 4.

4. Compliance with and Adequacy of Approved Strategies, Plans and Programs

All currently approved strategies, plans and programs were reviewed and, in particular, relevant commitments made within these plans. Compliance with these commitments was then assessed and the adequacy of these plans reviewed in light of the conditional requirement, site inspection and document review. Where appropriate, recommended actions arising from the review of these documents are presented in Section 4.

5. Status of Implementation of the Previous Independent Audit findings

The Company's response document submitted following the 2022 Independent Environmental Audit was reviewed and tabulated with an additional column to assess the status of implementation during this audit period (see Section 3.4 and **Appendix 6**).

6. High Level Review of the Environmental Management System

The Environmental Management System (EMS) for the HR Quarry is not a certified EMS. Therefore, review of the EMS was undertaken through a combination of document review, site observations and discussions with

Company personnel to understand the systems in place and how these are utilised to manage environmental aspects. A commentary on the HR Quarry EMS is provided in Section 3.5.

## 2.4 Compliance Status Descriptors

The assessment of compliance has been recorded generally in accordance with the *Independent Audit Post Approval Requirements 2020*. Compliance has been recorded as follows.

Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.
Not Determined	In a limited number of instances compliance was unable to be determined either due to an absence of information or need for clarification of the compliance requirement.

## 3. Audit Findings

### 3.1 Environmental Performance

#### 3.1.1 Summary of Agency Notices, Orders, Penalty Notices or Prosecutions

During the audit period, the Resource Regulator issued a number of Section 23, Section 191, and Section 195 Notices under the *Work Health and Safety Act 2011*. These notices and the required actions were reported within each respective Annual Review. These notices are focused upon safety and workplace hazards and were not directly relevant to environmental considerations at the Quarry. Therefore, these notices are not considered further as part of this audit.

No other notices, orders, penalty notices or prosecutions have been reported by the Company or were identified during the audit.

#### 3.1.2 Complaints

One complaint was recorded for the HR during the audit period (see **Table 3.1**).

**Table 3.1**  
**Summary of Complaints Received During Audit Period**

Date	Nature of Complaint	Follow-up Action
04/05/23	A truck and dog truck was alleged to be driven in a dangerous manner. No identification details of the truck were able to be provided.	As details of the truck could not be verified the Company undertook a re-education program for all truck drivers at both HR and ONR Quarries. The complainant was contacted to confirm that the re-education program had been completed.

The Company notes that it does not operate (or contract) its own truck fleet. Therefore, outside of the Quarry boundary, the Company does not have legal jurisdiction over the trucks. Notwithstanding, the Company does reserve the right, in accordance with the Traffic Management Plan and the Maroota Local Traffic Management Policy, to refuse access to drivers who do not comply with the provisions of the plan and policy.

#### 3.1.3 Incidents

The 2022/2023, 2023/2024 and 2024/2025 Annual Reviews reported a total of 21 ‘incidents’ during this period. Notably none of the ‘incidents’ are a non-compliance. Three ‘incidents’ related to the submission date for the Annual Review, which has previously been approved by DPHI and therefore is considered by the auditors as neither an incident or non-compliance. One incident related to elevated PM<sub>10</sub> levels, and 17 incidents related to elevated deposited dust levels.

Elevated 24-hour PM<sub>10</sub> levels were recorded on 27 May 2025, reaching 71.7µg/m<sup>3</sup> and were associated with a dust storm in the region, with elevated dust results recorded at other dust monitoring stations located at Penrith, Prospect and Richmond. As the event is considered an extraordinary event in accordance with the Development Consent, no non-compliance is recorded.

Deposited dust levels at gauge D10 exceeded the rolling annual average dust deposition criteria of 4.0g/m<sup>2</sup>/month a combined total of 17 times throughout the audit period. Notably, on seven of these occasions the monthly results were below the 4.0g/m<sup>2</sup>/month criteria, however, the average result remained above criteria due to previously recorded elevated results (with the criteria based upon the rolling annual average).

All exceedances at D10 were considered to be the result of adjoining farm activities and slashing of grass within the paddock in which the gauge is located. No further action was required by DPHI due to the notifications although further consultation and correspondence with EPA occurred with EPA issuing a variation to EPL12513 12 September 2024 requiring an assessment of air quality monitoring. The Company subsequently submitted a draft Air Quality Monitoring Plan to EPA for review on 12 November 2024 which included proposed relocation of some dust gauges and maintenance of a dust diary that record actions during dry and windy conditions. The Company advises that they have followed up with EPA, however, the draft Air Quality Monitoring Plan remains with EPA for review.

Whilst the updated plan has not yet been approved, the Company advises that the dust diary process will be implemented through incorporation into the daily and end of shift procedure/records (during the next print-run of these booklets) (**Improvement HR I1/25**). Observations and actions during the audit period were recorded ad-hoc / as required.

### 3.1.4 Actual Verses Predicted Environmental Impacts

A summary of the approval criteria and/or predicted environmental outcomes for the principal environmental aspects relevant to the Quarry is provided in **Table 3.2** together with a discussion of performance / compliance during the audit period. Information for assessing performance has largely been drawn from the Annual Reviews prepared during the audit period, available monitoring data and, to a lesser extent, the observations during the site inspection.

**Table 3.2**  
**Summary of Actual Verses Predicted Environmental Impacts / Performance**

Page 1 of 3

Aspect	Approval Criteria / EIS Prediction	Performance During the Audit Period
Noise	Day and shoulder period ranging from 35dB(A) to 40dB(A) at seven residence locations and 35dB(A) at all other locations. <i>(DA Condition 3(3))</i>	No noise related complaints received relating to noise during the audit period. Noise monitoring was undertaken during December 2022, June 2023, December 2023, June 2024, December 2024 and June 2025.  Due to high ambient noise levels, the contribution of the Quarry operations had to be extrapolated at three locations for the December 2024 and June 2025 noise monitoring. Calculated results were 2dB(A) and 1dB(A) above criteria for Receiver R8. Whilst the noise monitoring report states that operations were compliant and that the significance of the residual noise level at Receiver R8 is likely negligible, it is considered that this remains an exceedance.  It was advised that the calculations were complete assuming equipment was located at surface, however, most noise sources are located within the extraction area with substantial topographic shielding and that if this was taken into account compliance would likely have been predicted ( <b>Recommendation HR R1/25</b> ).  Noise levels during all other Receivers and monitoring events were at or below the relevant criteria.

**Table 3.2 (Cont'd)**  
**Summary of Actual Verses Predicted Environmental Impacts / Performance**

Aspect	Approval Criteria / EIS Prediction	Performance During the Audit Period
Air Quality	PM <sub>10</sub> 24hr (incremental) = 50ug/m <sup>3</sup> PM <sub>10</sub> Annual (cumulative) = 30ug/m <sup>3</sup> TSP Annual (cumulative) = 90ug/m <sup>3</sup> Dep Dust (cumulative) = 4g/m <sup>2</sup> /month Dep Dust (incremental) = 2g/m <sup>2</sup> /month (DA Condition 3(9))	No air quality-related complaints were received during the audit period. Whilst the results of air quality monitoring during the audit period recorded one exceedance of the 24hr PM <sub>10</sub> criteria, and 17 exceedances of the deposited dust criteria, these were attributed to either non-Quarry related activities or extraordinary weather events. See Section 3.1.3 of this audit report.
Traffic	Truck movement limits: 180 per day (including transfers to ONR Quarry) 20 between 6.00am and 7.00am (DA Condition 2(8))	One truck-related complaint was received during the audit period relating to driver conduct. The truck could not be identified so a re-education program was (see <b>Table 3.1</b> ). During the audit period, maximum daily truck movements remained within the approved limit with the following maximums. <ul style="list-style-type: none"> <li>• 2022/2023 maximum daily truck movements = 178</li> <li>• 2023/2024 maximum daily truck movements = 166</li> <li>• 2024/2025 maximum daily truck movements = 154</li> </ul> No trucks dispatched prior to 6:00am. Maximum recorded truck movements before 7:00am remained within the approved limit with the following maximums. <ul style="list-style-type: none"> <li>• 2022/2023 maximum truck movements = 20</li> <li>• 2023/2024 maximum truck movements = 20</li> <li>• 2024/2025 maximum truck movements = 20</li> </ul>
Surface Water	The DA does not specify criteria and there are no licenced discharge points. The 2005 EIS and 2016 Environmental Assessment predicted that there would be no significant impacts.	The Annual Reviews report that there were no surface water discharges during the audit period, and this was confirmed by the Environmental Officer. Ambient water quality monitoring is undertaken, however, the Annual Reviews note that additional data is required to establish baseline quality and the approved Soil and Water Management Plan (SWMP) does not yet include trigger levels. Given that there has been no discharge and that no issues relating to uncontrolled run off or sedimentation were observed during the audit inspection, it is considered that the Quarry is unlikely to have significantly impacted surface water.
Groundwater	Neither the DA nor EPL specify quality criteria. No extraction is to occur within 2m of the highest recorded wet weather groundwater level within both the MTSGS and SBCGS. (DA Condition 2(19)) The 2005 EIS predicted it would be unlikely that there would be extraction induced lowering of groundwater levels. Due to previous agricultural activity and previous removal of humic material it was considered unlikely the quarry would affect the pH of the downstream groundwater. The 2016 Environmental Assessment predicted there would be no capture of groundwater and no interference with neighbouring bores.	The Maximum Extraction Depth Map was last revised 15 April 2023 ( <i>Document HR20-2025</i> ) and approved by DPHI on 8 December 2023. Reviews have been completed annually, as reported within the respective Annual Review, with no further changes during the audit period. Procedures for extraction depth limit checks, including the engagement of surveyors once extraction approaches within 5m of the maximum extraction depth, are outlined in the SWMP. Surveys of extraction areas are undertaken annually to confirm extraction volumes. Based on the 2025 survey extraction levels in Cells 1a to 2b appear to be down to approximately 120m AHD whilst the 2023 approved Maximum Extraction Depth Map contour in this area appears to be 128m AHD. It is advised that groundwater levels in the new bore BH07 demonstrate the groundwater level is approximately 77m AHD, significantly lower than the current depth of extraction and therefore remaining >2m above the wet weather groundwater level. Notwithstanding, the Maximum Extraction Depth Map requires update and approval. <b>Recommendations HR R2/25 and HR R3/25</b>

**Table 3.2 (Cont'd)**  
**Summary of Actual Verses Predicted Environmental Impacts / Performance**

Page 3 of 3

Aspect	Approval Criteria / EIS Prediction	Performance During the Audit Period
Groundwater (Cont'd)		<p>The Annual Reviews report that groundwater levels for the H-series boreholes have responded to climatic conditions with fluctuations directly correlating to recharge after rainfall events. Monitoring bores within the SBCGS have remained relatively stable since their commissioning in 2011.</p> <p>The Annual Reviews report that pH and electrical conductivity (EC) have remained relatively stable in the H-series boreholes since 2010. The baseline water quality monitoring has also been completed within the MTSGS buffer zone.</p> <p>Results do not indicate an extraction induced lowering of groundwater levels or a significant impact upon water quality.</p>
Heritage	During the studies for the 2005 EIS and 2016 Environmental Assessment no heritage matters were identified and the potential for unrecorded cultural material to be encountered was considered low.	The Environmental Officer confirms that no items suspected of being Aboriginal heritage have been encountered during the reporting period.
Biodiversity	<p>A range of biodiversity credits must be retired prior to any vegetation clearing in the MOD1 extraction area. (DA Condition 3(30 to 33))</p> <p>Progressive rehabilitation must be undertaken. (DA Condition 3(35))</p>	<p>A range of correspondence with DPFI occurred during the audit period with correspondence from DPFI dated 10 April 2024 confirming that the biodiversity credit obligations as required by <i>Schedule 3 Conditions 31, 32 and 33</i> have been met. (Document HR56-2025).</p> <p>Progressive rehabilitation has been undertaken at the HR Quarry where practicable, focusing principally on formation of the final landform the eastern 3ha of Stage 1 and establishment of vegetation on the western edge of Stage 2. Remaining areas remain under active extraction.</p>

## 3.2 Compliance Assessment

### 3.2.1 Status of Approvals and Licences

Table 3.3 provides a summary of the status of relevant approvals and licences that have been granted for the HR Quarry.

**Table 3.3**  
**Summary of Current Consents, Licences and Permits**

Page 1 of 2

Approval / Licence / Permit	Issue Date	Expiry Date	Details / Comments
<b>Development Approvals</b>			
Development Consent 165-7-2005	14/02/2006	14/02/2046	Development consent originally granted by the (then) Minister for Planning on 14 February 2006. The development consent has subsequently been modified on six occasions, with Modification No. 6 approved 6 September 2023.
<b>Environment Protection Licence</b>			
Environment Protection Licence No. 12513	26/07/2006	Renewed Annually	Current version date 12 September 2024. Reporting period 25 July to 24 July.

**Table 3.3 (Cont'd)**  
**Summary of Current Consents, Licences and Permits**

Page 2 of 2

Approval / Licence / Permit	Issue Date	Expiry Date	Details / Comments
<b>Other Approvals &amp; Licences</b>			
Water Supply Works Approval 10CA104191	01/07/2011	30/06/2034	Approves diversion works (pump) and storages in the Cattai Creke Water Source for the purpose of extraction and irrigation. This is the nominated work for WAL25941.
Water Supply Works Approval 10CA105044	01/07/2011	30/06/2034	Approves diversion works (pumps) and storages in the Cattai Creek Water Source. This is the nominated work for WAL25956.
Water Access Licence 25941	Continuing		Provides an entitlement of 50ML from the Cattai Creek Water Source. Works Approval 10CA104191 is the nominated work.
Water Access Licence 25956	Continuing		Provides an entitlement of 132ML from the Cattai Creek Water Source. Works Approval 10CA105044 is the nominated work.

### 3.2.2 Compliance Performance

A tabulated compliance assessment was completed against the requirements of DA 165-7-2005, EPL 12513, WAL 25941 and WAL 25956. The full compliance assessment is presented as **Appendix 4** with a summary of the compliance performance provided as follows.

#### DA 165-7-2005

The status of compliance against the conditional components of DA 165-7-2005 was assessed as follows.

<b>Compliant</b>	<b>175</b>
Non-Compliant	11
Not Triggered	28
Not Determined	1
<b>Total</b>	<b>215</b>

#### EPL 12513

The status of compliance against the conditional components of EPL 12513 was assessed as follows.

<b>Compliant</b>	<b>54</b>
Non-Compliant	3
Not Triggered	12
Not Determined	0
<b>Total</b>	<b>69</b>

#### WAL 25941

The status of compliance against the conditional components of WAL25941 was assessed as follows.

<b>Compliant</b>	<b>5</b>
Non-Compliant	0
Not Triggered	5
Not Determined	1
<b>Total</b>	<b>11</b>

## WAL 25956

The status of compliance against the conditional components of WAL25956 was assessed as follows.

<b>Compliant</b>	<b>5</b>
Non-Compliant	0
Not Triggered	5
Not Determined	1
<b>Total</b>	<b>11</b>

### 3.2.3 Summary of Non-Compliances

Non-compliances recorded against DA 165-7-2005 and EPL12513 are presented in full within **Appendix 4** and summarised in **Tables 3.4** and **3.5**. No non-compliances were recorded against WAL 25941 or WAL 25956.

**Table 3.4**  
**Summary of Non-compliances with DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS</b>				
<b>TERMS OF CONSENT</b>				
2 2 (b)	<p>The Applicant must carry out the development: in accordance with the conditions of this consent and the Development Layout Plans.</p> <p><i>Note: The Development Layout Plan is shown in Appendix 1</i></p>	<b>Non-compliant</b>	HR02-2025 Observations	<p>The Quarry layout was observed to reflect the Development Layout Plans included as Appendix 1 of DA 167-7-2005.</p> <p>However, several non-compliances have been recorded against the conditions of this consent during the audit period and hence contributed to the non-compliance status for this condition. See Conditions 2(19), 3(3), 3(16)(d), 3(19)(d), 3(26), 3(36)(g), 5(5), and 5(9).</p>
<b>STRUCTURAL ADEQUACY</b>				
11	<p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <li><i>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for any proposed building works;</i></li> <li><i>The Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development."</i></li> </ul>	<b>Non-Compliant</b>	HR24-2025 Advice from Environment Officer	<p>During the audit period the Sandstone Cutting Shed, Maintenance Workshop, Site Office, Lunchroom etc was constructed. Approvals for the Operation of a System of Sewage Management issued 20 December 2022 and 6 February 2025 by the Hills Shire Council for the on-site sewage management facilities. Construction certificates were issued by Urban City Certifiers 30 October 2023 for construction of the Sandstone Cutting Shed and Maintenance Workshop. It was advised that the occupation certificates are to be received imminently (following a modification lodged with Urban City Certifiers).</p> <p><b>Recommendation HR R11/25.</b></p> <p>The Environmental Officer advises that, as the office facilities involved renovation of an existing building a construction certificate was not required.</p>

**Table 3.4 (Cont'd)**  
**Summary of Non-compliances with DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>LIMITS OF EXTRACTION</b>				
<b>Maximum Extraction Depth</b>				
19	The Applicant must not undertake any extraction within 2 metres of the highest recorded wet weather groundwater level of both the MTSGS and the SCBGS.	<b>Non-compliant</b>	HR20-2025 HR57-2025  Advice from Environmental Officer	A Maximum Extraction Depth Map was approved by DPE in 2018 and was reviewed by Golder 14 April 2023.  It is advised that Quarry personnel regularly check extraction depth progress using a GPS. Procedures for extraction depth limit checks, including the engagement of surveyors once extraction approaches within 5m of the maximum extraction depth, are outlined in Section 5.2.2 of the SWMP. Surveys of extraction areas have been provided but are not overlain with the approved extraction contours. Review of the survey indicates non-compliance with the 2023 Maximum Extraction Depth map. It is advised that groundwater levels in the new bore BH07 demonstrate the groundwater level is approximately 77m AHD, significantly lower than the current depth of extraction and therefore remaining >2m above the wet weather groundwater level. However, a non-compliance has been recorded as extraction has exceeded the currently approved extraction depth. <b>Recommendations HR R2/25 and HR R3/25.</b>  It is noted that the Maximum Extraction Depth Map is provided on the website and is referenced in the SWMP as Appendix 3, however, the map itself is missing from the SWMP (see <b>Improvement HR Ic/2025</b> ).
21	The Applicant must comply with the extraction depths specified in the approved Maximum Extraction Depth Map, to the satisfaction of the Secretary.	<b>Non-compliant</b>	HR20-2025 HR57-2025  Advice from Environmental Officer	It is advised that Quarry personnel regularly check extraction depth progress using a GPS. Procedures for extraction depth limit checks, including the engagement of surveyors once extraction approaches within 5m of the maximum extraction depth, are outlined in Section 5.2.2 of the SWMP. Surveys of extraction areas have been provided but are not overlain with the approved extraction contours. Review of the survey indicates non-compliance with the 2023 Maximum Extraction Depth Map. <b>Recommendations HR R2/25 and HR R3/25</b>

**Table 3.4 (Cont'd)**  
**Summary of Non-compliances with DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																			
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS</b>																							
<b>NOISE</b>																							
3	<p>The Applicant must ensure that operational noise generated by the development (excluding acoustic bund construction) does not exceed the criteria in Table 2 at any residence on privately-owned land.</p> <p><i>Table 2: Operational noise criteria dB(A)</i></p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver</th> <th>Day</th> <th colspan="2">Shoulder (6.00 am to 7.00 am)</th> </tr> <tr> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>A</sub>(max)</th> </tr> </thead> <tbody> <tr> <td>R05, R06</td> <td>41</td> <td>35</td> <td rowspan="4">52</td> </tr> <tr> <td>R03</td> <td>40</td> <td>37</td> </tr> <tr> <td>R13, R14</td> <td>40</td> <td>36</td> </tr> <tr> <td>All other receivers</td> <td>40</td> <td>35</td> </tr> </tbody> </table>	Receiver	Day	Shoulder (6.00 am to 7.00 am)		L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A</sub> (max)	R05, R06	41	35	52	R03	40	37	R13, R14	40	36	All other receivers	40	35	<b>Non-compliant</b>	<p>HR04-2025 HR05-2025 HR06-2025</p> <p>Attended noise monitoring was undertaken during December 2022, June 2023, December 2023, June 2024, December 2024, and June 2025. Due to high ambient noise levels, the contribution of the Quarry operations had to be extrapolated at three locations for the December 2024 and June 2025 noise monitoring. Calculated results were 2dB(A) and 1dB(A) above criteria for Receiver R8. Whilst the noise monitoring report states that operations were compliant and that the significance of the residual noise level at Receiver R8 is likely negligible, it is considered that this remains an exceedance.</p> <p>It was advised that the calculations were complete assuming equipment was located at surface, however, most noise sources are located within the extraction area with substantial topographic shielding and that if this was taken into account compliance would likely have been predicted (<b>Recommendation HR R1/25</b>).</p> <p>Noise levels during all other Receivers and monitoring events were at or below the relevant criteria.</p>
Receiver	Day		Shoulder (6.00 am to 7.00 am)																				
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A</sub> (max)																				
R05, R06	41	35	52																				
R03	40	37																					
R13, R14	40	36																					
All other receivers	40	35																					

**Table 3.4 (Cont'd)**  
**Summary of Non-compliances with DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>SOIL AND WATER</b>				
<b>Groundwater Management</b>				
16 (d)	install water level loggers in all existing on-site quarry dams and in new quarry dams when constructed; and	<b>Non-compliant</b>	HR04-2025 HR05-2025 HR06-2025	Water level data loggers have been installed in groundwater bores but have not been installed in on-site dams. See <b>Recommendation HR R4/25</b> .
19. (d) (iii)	<p>Groundwater Management Plan that:</p> <ul style="list-style-type: none"> <li>• includes detailed management measures to ensure that quarrying operations do not intercept the highest recorded wet weather groundwater level of the MTSGS and/or the SCBGS;</li> <li>• includes a protocol to obtain appropriate water licence(s) to cover the volume of any unforeseen groundwater inflows into the quarry from the quarry face or floor; and</li> <li>• includes a monitoring program to manage potential impacts, if any, on any alluvium and associated surface water source near the proposed extraction area that includes: <ul style="list-style-type: none"> <li>– monitoring of groundwater inflows into the quarry from the quarry face or floor, or into any in-pit sumps;</li> <li>– identification of a methodology for determining threshold water level criteria;</li> <li>– contingency measures in the event of a breach of thresholds; and</li> <li>– a program to regularly report on monitoring.</li> </ul> </li> </ul> <p>The Applicant must implement the Soil and Water Management Plan as approved by the Secretary.</p>	<b>Non-compliant</b>	HR14-2025	The site currently operates in accordance with the SWMP dated January 2024, however, extraction below the depth of the 2023 Maximum Extraction Depth Map represents a non-compliance with the processes within the SWMP.

**Table 3.4 (Cont'd)**  
**Summary of Non-compliances with DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>Monitoring of Product Transport</b>				
26.	The Applicant must keep accurate records of all laden truck movements to and from the site (including time of arrival and dispatch) and publish a summary of these records on its website every 6 months.	<b>Non-compliant</b>	Advice from Environmental Officer.	Two systems are utilised to record truck movements. To ensure compliance with the truck limits prior to 7:00am records are taken by the weighbridge operator and recorded in a separate Excel spread sheet. Daily truck limits are also recorded and managed using weighbridge software, ClearWeigh. Whilst the software records times of laden truck movements over the weighbridge, it does not record unladen movements (which do not pass over the weighbridge). See <b>Recommendation HR R5/25</b> .  The 6-monthly summary of laden truck movement records are published on the Dixon Sand website.
36 (g)	include a detailed description of the measures described in paragraph (f) to be implemented over the next 3 years (to be updated for each 3 year period following initial approval of the plan) including the procedures to be implemented for:	<b>Non-Compliant</b>	HR80-2022 HR106-2022  Advice from Environmental Officer	The updated BRMP (unapproved) outlines a rehabilitation strategy for 2021-2023.  An updated BRMP outlining a rehabilitation strategy for subsequent periods has not been prepared. <b>Recommendation HR R6/25</b> .

Table 3.4 (Cont'd)  
Summary of Non-compliances with DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING</b>				
<b>ENVIRONMENTAL MANAGEMENT</b>				
<b>Revision of Strategies, Plans &amp; Programs</b>				
5	<p>Within 3 months of the submission of an:</p> <p>(a) incident report under Condition 10 below;</p> <p>(b) Annual Review under Condition 12 below;</p> <p>(c) Independent Environmental Audit report under Condition 14 below; and</p> <p>(d) any modifications to this consent,</p> <p>the Applicant must review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. The Applicant must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary.</p> <p>Note: <i>The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.</i></p>	<b>Non-compliant</b>	<p>HR109-2022 HR110-2022 HR111-2022 HR112-2022 HR113-2022 HR52-2025 HR53-2025 HR54-2025 HR55-2025</p>	<p>During the audit period a total of 21 'incident' reports were submitted during the audit period. Of these 18 related to elevated dust levels. None of the exceedances were attributed to the Quarry and therefore no non-compliance was recorded against the relevant conditions in Schedule 3 of this approval. It is advised that no updates to the management plans were required, however, the Department weren't notified. See <b>Recommendation HR R7/25</b> and <b>Improvement HR Ig/25</b>.</p> <p>Management plans were otherwise reviewed within appropriate timeframes following the submission of Annual Reviews during the audit period, the 2022 IEA and the 2023 MOD6. Reviews were lodged to the Department, as required. However, the BRMP was not resubmitted within 6 weeks with outstanding matters to be addressed (see <b>Recommendation HR R6/25</b>).</p>
<b>REPORTING</b>				
<b>Incident Notification</b>				
9	<p>The Proponent 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.</p>	<b>Non-compliant</b>	<p>HR04-2025 HR05-2025 HR06-2025</p> <p>Advice from Environmental Officer</p>	<p>During the audit period a total of 21 'incidents' were recorded during the audit period. Of these 3 related to 'late' submission of the Annual Review, although the revised submission date has previously been approved by DPHI. The remaining 18 related to elevated dust levels.</p> <p>Incident reports were submitted as relevant, however, the incident reports were submitted "to provide the specific details of the dust deposition exceedance as required by Conditions 9 and 10, Schedule 5". Whilst it is acknowledged that the reports were likely provided the same day as becoming aware of the exceedance this does not technically meet the requirement to immediately notify.</p> <p><b>Recommendation HR R8/25.</b></p>

**Table 3.5**  
**Summary of Non-compliances with EPL12513**

Cond. No.		Compliance Status	Basis for Compliance	Comments and Recommended Actions																																																							
<b>L3 Noise limits</b>																																																											
L3.1	<p>Noise generated at the premises must not exceed the noise limits presented in the table below. Note that the noise limits represent the noise contribution from the Haerses Road sand quarry site at Maroota.</p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Location</th> <th>Day</th> <th>Shoulder (6am to 7am)</th> <th>Shoulder (6am to 7am)</th> </tr> <tr> <th></th> <th></th> <th>L<sub>Aeq</sub>(15 minutes)</th> <th>L<sub>Aeq</sub>(15 minutes)</th> <th>L<sub>A</sub>(max)</th> </tr> </thead> <tbody> <tr> <td>R1</td> <td>1710 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R2</td> <td>1700 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R3</td> <td>1843 Wisemans Ferry Road</td> <td>40</td> <td>37</td> <td>52</td> </tr> <tr> <td>R4</td> <td>1817 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R6</td> <td>1543 Wisemans Ferry Road</td> <td>41</td> <td>35</td> <td>52</td> </tr> <tr> <td>R7</td> <td>1539 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R8</td> <td>1521 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td></td> <td>All other residences on privately owned land</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R5</td> <td>1579 Wisemans Ferry Road</td> <td>41</td> <td>35</td> <td>52</td> </tr> </tbody> </table>	Receiver	Location	Day	Shoulder (6am to 7am)	Shoulder (6am to 7am)			L <sub>Aeq</sub> (15 minutes)	L <sub>Aeq</sub> (15 minutes)	L <sub>A</sub> (max)	R1	1710 Wisemans Ferry Road	40	35	52	R2	1700 Wisemans Ferry Road	40	35	52	R3	1843 Wisemans Ferry Road	40	37	52	R4	1817 Wisemans Ferry Road	40	35	52	R6	1543 Wisemans Ferry Road	41	35	52	R7	1539 Wisemans Ferry Road	40	35	52	R8	1521 Wisemans Ferry Road	40	35	52		All other residences on privately owned land	40	35	52	R5	1579 Wisemans Ferry Road	41	35	52	<b>Non-compliant</b>	HR04-2025 HR05-2025 HR06-2025	<p>Attended noise monitoring was undertaken during December 2022, June 2023, December 2023, June 2024, December 2024, and June 2025. Due to high ambient noise levels, the contribution of the Quarry operations had to be extrapolated at three locations for the December 2024 and June 2025 noise monitoring. Calculated results were 2dB(A) and 1dB(A) above criteria for Receiver R8. Whilst the noise monitoring report states that operations were compliant and that the significance of the residual noise level at Receiver R8 is likely negligible, it is considered that this remains an exceedance.</p> <p>It was advised that the calculations were complete assuming equipment was located at surface, however, most noise sources are located within the extraction area with substantial topographic shielding and that if this was taken into account compliance would likely have been predicted (<b>Recommendation HR R1/25</b>).</p> <p>Noise levels during all other Receivers and monitoring events were at or below the relevant criteria.</p>
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O4.8	The sealed access road to the premises must be kept free of dust, sediment and other raw materials at all times.	<b>Non-compliant</b>	Observation Photos E1022C_003, 008 to 011	Minor tracking / deposition was observed on the exit side of the access road. This appears to primarily be originating from an unsealed truck pull over area on Haerses Road near the intersection with Wisemans Ferry Road. See <b>Recommendation HR R9/25</b>																																																							

**Table 3.5 (Cont'd)**  
**Summary of Non-compliances with EPL12513**

Cond. No.		Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>L3 Noise limits</b>				
U1.4	Air Quality Monitoring Report: By (fourteen months of issuing the Variation Notice), the Licensee must provide the EPA, via email at <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a> , with an Air Quality Monitoring Report, prepared by the Consultant that summarises the air quality monitoring conducted over the previous 12 months period (the Report). The Report must: <ul style="list-style-type: none"> <li>a. analyse and summarise the data including a comprehensive summary of the monitoring undertaken as required outlined in condition U1.3, and</li> <li>b. adequately addresses and justify any recommendations on the continuation or changes to the dust monitoring at the Premises and supported by valid data.</li> </ul>	<b>Non-Compliant</b>	Advice from Environmental Officer	It is noted that the Air Quality Monitoring Report was required to be submitted by 12 November 2025. Whilst technically non-compliant, submission of the Air Quality Monitoring Report is pending a response the EPA regarding the draft Air Quality Monitoring Plan. It is advised that EPA have been followed up via phone for their response. Therefore, the non-compliance is considered administrative and beyond the control of the Company.  It is recommended that EPA be requested to vary the EPL conditions as appropriate to the outcomes of their review of the submitted documentation ( <b>Recommendation HR R10/25</b> ).

## 3.3 Compliance with and Adequacy of Strategies, Plans and Programs

### 3.3.1 Status of Strategies, Plans and Programs

A list of the strategies, plans and programs relied upon to guide environmental practices and their status as at the audit date is provided in **Table 3.5**.

**Table 3.6**  
**Strategies, Plans and Programs Audited**

<b>Strategy / Plan / Program</b>	<b>Status</b>
Environmental Management Strategy	Dated January 2024. Prepared by Project Environmental Services Pty Ltd. Requirement of DA 165-7-2005 <i>Schedule 5 Condition 1</i> . Approved by DPHI 18 January 2024.
Air Quality Management Plan	Appendix 6 of the Environmental Management Strategy. Dated January 2024. Prepared by Project Environmental Services Pty Ltd. Approved by DPHI 18 January 2024. Requirement of DA 165-7-2005 <i>Schedule 3 Condition 11</i> .
Noise Management Plan	Appendix 7 of the Environmental Management Strategy. Dated January 2024. Prepared by Project Environmental Services Pty Ltd. Approved by DPHI 18 January 2024. Requirement of DA 165-7-2005 <i>Schedule 3 Condition 8</i> .
Soil and Water Management Plan	Appendix 8 of the Environmental Management Strategy. Dated January 2024. Prepared by Project Environmental Services Pty Ltd. Approved by DPHI 18 January 2024. Requirement of DA 165-7-2005 <i>Schedule 3 Condition 19</i> .
Traffic Management Plan	Appendix 9 of the Environmental Management Strategy. Dated January 2024. Prepared by Project Environmental Services Pty Ltd. Approved by DPHI 18 January 2024. Requirement of DA 165-7-2005 <i>Schedule 3 Condition 28</i> .
Biodiversity and Rehabilitation Management Plan	Appendix 10 of the Environmental Management Strategy. Dated November 2020. Prepared by Umwelt. Approved by (then) DPE 16 November 2020. Requirement of DA 165-7-2005 <i>Schedule 3 Condition 36</i> . An updated BRMP (version dated November 2022) was submitted to (then) DPE. Further updates were requested 22 December 2022. It is advised that these matters remain to be resolved with the Department and, now, CPHR <b>Recommendation HR R6/25</b>
Acoustic Bund Construction Noise Management Plan	Appendix 11 of the Environmental Management Strategy. Dated January 2024. Prepared by Project Environmental Services Pty Ltd. Approved by DPHI 18 January 2024. Requirement of DA 165-7-2005 <i>Schedule 3 Condition 6</i> .

### 3.3.2 Review of Strategies, Plans and Programs

#### 3.3.2.1 Environmental Management Strategy

The Environmental Management Strategy (EMS) addresses the requirements of DA 165-7-2005 *Schedule 5 Condition 1* and is structured in an appropriate manner. The EMS is supported by the other management plans required by DA 165-7-2005 which are appended to the EMS.

In relation to matters considered appropriate for improvement, the following is noted.

Updates are recommended to Section 7 (Incident Response) of the EMS to provide further guidance on the process for review of the EMS and associated management plans. Whilst noted elsewhere within the EMS, when reviewing the tasks required for responding to an incident, inclusion of all relevant information (or cross reference to relevant information such as an Incident Response Checklist) would be helpful. See **Improvement HR Ig/25**.

The current 2024 EMS and management plans principally include figures with aerial photography dated 2017 and 2022. Whilst not required for compliance, as a management tool it is helpful to see approved boundaries, monitoring locations, water management structures etc in the context of the current site status. See **Improvement HR I15/25**.

### **3.3.2.2 Air Quality Management Plan**

The Air Quality Management Plan (AQMP) addresses the requirements of DA 165-7-2005 *Schedule 3 Condition 11* and EPL 12513 and includes a summary of the regulatory requirements, baseline data, assessment criteria, mitigation measures, monitoring, reporting, responsibilities and review. The AQMP has generally been prepared to a high standard. The presentation of the management measures, both proactive and reactive, in a table format with timing, responsibility and performance indicator is commended.

Updates and improvements to the AQMP have been made since the 2022 IEA. Whilst the discussion regarding management and mitigation measures for saw cutting operations within the AQMP is limited, it was advised that management measures involving the addition of water to the excavator mounted saws within the extraction area result in extreme wear on the cutting blades. However, wet cutting processes are utilised within the cutting shed (as noted in Section 5.1 of the AQMP). Air quality management measures were during the site inspection were deemed appropriate with no excessive dust noted.

In relation to other regulatory requirements, since preparation of the 2024 AQMP EPL12513 has been varied, with the last variation on 12 September 2024 including a condition requiring the completion of an assessment of air quality monitoring, a 12-month monitoring program and subsequent assessment of the monitoring outcomes. A draft monitoring program has been provided for EPA review, and a response is awaiting from EPA. The outcomes from this process should be reflected within the AQMP as appropriate (see **Improvement HR I9/25**).

No non-conformances with the implementation of the AQMP were identified.

### **3.3.2.3 Noise Management Plan**

The Noise Management Plan (NMP) adequately addresses the requirements of DA 165-7-2005 *Schedule 3 Condition 8* and EPL 12513 and includes a summary of the regulatory requirements, the existing noise environment, assessment criteria, mitigation measures, monitoring, reporting, responsibilities and review. The presentation of the management measures, both proactive and reactive, in a table format with timing, responsibility and performance indicator is commended.

In relation to other regulatory requirements, since preparation of the 2024 NMP, EPL12513 has been varied once, on 12 September 2024. These changes did not relate to aspects affecting noise. No specific improvements were identified as part of the high-level review and, in relation to implementation of the NMP, no specific non-compliances were identified.

### **3.3.2.4 Soil and Water Management Plan**

The Soil and Water Management Plan (SWMP) adequately addresses the requirements of DA 165-7-2005 *Schedule 3 Condition 19* and is structured in an appropriate manner. The inclusion of relevant soil and water management commitments and associated hold points provides a useful summary of those monitoring and management actions which must be completed prior to the commencement of further development stages at the Quarry.

The 2024 SWMP also addresses the matters raised by DCCEEW – Water Group during consultation for this audit (see **Table 2.1**) as follows.

- Section 4.0 of the SWMP includes a water balance for the statistical 10<sup>th</sup>, 50<sup>th</sup> and 90<sup>th</sup> percentile years to indicate the most likely Quarry inflows and water demand for current and a future operational scenario.
- Section 5.0 summarises water licencing, monitoring and reporting.
- Section 6.0 provides Trigger Action Response Plans (TARPs) for surface water and groundwater.

As per Section 5.0 of the SWMP, reporting of water management, monitoring and water take is presented in Section 6.0 of the respective Annual Reviews.

Improvements to the SWMP since the 2022 IEA include the inclusion of soil and stockpile management practices (with soil stockpiling matters identified in the 2022 IEA having been rectified). A further improvement discussed during the 2025 IEA is the included requirement to prepare and maintain a soil stockpile map and register to record the location and volumes of soil stored and utilisation of signage (see **Improvement HR I13/25**).

It is also noted that the trigger range for the groundwater monitoring bore pH levels is generally small with many only providing a 0.3 pH unit range. Notwithstanding, the inclusion of three consecutive exceedances of the trigger value appears to be providing an appropriate level of management without unnecessary reporting.

In relation to implementation of the SWMP, two non-compliances were identified with respect to the following.

- Water level loggers, or an alternate method of recording water levels should be installed at each of the on-site dams used to support Quarry operations (or the conditional requirement modified) (see **Recommendation HR R4/25**).
- The maximum extraction depth has exceeded the levels shown on the currently approved 2023 Maximum Extraction Depth Map (see **Recommendations HR R2/25 and HR R3/25**).

An improvement was also identified in relation to Section 3.0 of the SWMP which described the water management system as of 2022 and with an aerial photo dated 2017. The description and figures (Figures 3.1 and 3.3) require update to reflect the current water management system (in which extraction has commenced in Cells 1a to 3b, the Stage 2 west sediment dam has been constructed etc, and the future system for the remainder of extraction. See **Improvement HR I16/25**. It is noted that no concerns regarding current water management practices were noted during the audit site inspection.

### **3.3.2.5 Traffic Management Plan**

The Traffic Management Plan (TMP) adequately addresses the requirements of DA 165-7-2005 Schedule 3 Condition 28 and is structured in an appropriate manner. The TMP is supported by a number of appendices including the Site Traffic Management Plan: Maroota Local Traffic Management Policy, Site Traffic Control Plan, and Site Induction for Drivers.

Given that the Company does not operate or contract its own trucks, the measures as outlined within the TMP are generally considered adequate and no further improvements with regards to these measures are considered necessary.

No issues or non-conformances with the implementation of the TMP were identified.

### **3.3.2.6 Biodiversity and Rehabilitation Management Plan**

The Biodiversity and Rehabilitation Management Plan (BRMP) adequately addresses the requirements of DA 165-7-2005 *Schedule 3 Condition 36* and is generally structured in an appropriate manner. However, the Quarry currently operates under the 2020 BRMP with an updated BRMP (version dated November 2022) submitted to the (then) DPE remaining unapproved. Further updates were requested 22 December 2022, but it is advised that these matters remain to be resolved with the DPHI and the (now) Conservation Programs, Heritage and Regulation (CPHR) branch. Since this time Modification has been approved. As a result, the BRMP is recommended to be updated to address the following (see **Recommendation HR R6/25**).

- Matters previous raised by the (then) Environment and Heritage Group, now CPHR.
- Incorporation of any required changes following the September 2023 MOD6 approval.
- An updated rehabilitation strategy for the next 3-year period (for compliance with DA Condition 36(g)).

In relation to implementation of the BRMP, whilst opportunities for progressive rehabilitation have remained limited, the Company continues to undertake rehabilitation, maintenance and improvement works, as reported in the respective Annual Reviews. This has included supplementary planting within the buffer zone with Wisemans Ferry Road (*Photos E1022C-173 and 174*).

### **3.3.2.7 Acoustic Bund Construction Noise Management Plan**

The Acoustic Bund Construction Noise Management Plan (CNMP) adequately addresses the requirements of DA 165-7-2005 *Schedule 3 Condition 6* and is generally structured in an appropriate manner.

Construction of the acoustic bunds has not yet commenced as the requirements for the bunds have not been triggered. As such, an assessment of the implementation of the CNMP was not possible.

### 3.4 Implementation of Previous Audit Recommendations

The Company prepared a response to 2022 Independent Environmental Audit findings which included proposed actions for each non-compliance identified in the audit. **Appendix 6** presents a copy of the 2022 audit response together with a review of the status of the proposed actions as at the time of the 2025 audit.

In summary, a high degree of implementation of recommendations and improvements proposed in the 2022 Independent Environmental Audit was achieved. Of the 18 recommendations and improvements, 10 have been repeated and/or additional recommendations or improvements suggested relating to the same matter.

### 3.5 Review of Environmental Management System

The Company does not have a formal or certified Environmental Management System. Notwithstanding, the Company's informal Environmental Management System is supported by the Environmental Management Strategy and associated management plans as well as a range of registers for complaints, engagement / consultation, incidents, TEOM alarms etc, inspection checklists / records, toolbox talks, additional forms and records.

Overall, the existing system appears to be supporting the necessary functions. Whilst existing personnel are familiar with the various components of the system, some further guidance regarding actions required following an incident is still recommended. This could be in the form of a checklist and/or update of the Environmental Management Strategy (**Recommendation HR R8/25 and Improvement HR I6/25**).

### 3.6 Approach to Environmental Management

During the audit, a high degree of knowledge of environmental management matters was evident which was reflected in the condition of the site. The Company's active engagement and involvement with the local community is highly commended. The record of engagement demonstrates that engagement occurs regularly and is not restricted to CCC meetings.

Whilst a range of recommended actions have been provided to assist in maintaining compliance and improving environmental management, there is an existing proactive and collaborative approach to environmental management.

The Company's commitment to maintaining records is also commended with well organised documentation / records provided throughout the audit.

## 4. Recommended Actions

### 4.1 Introduction

The audit of the HR Quarry has identified a number of recommended actions either in response to a non-compliance (“Recommendation”) or a potential for improvement in environmental performance (suggested “Improvement”). Recommendations have been presented with the prefix “HR R” and are provided in Section 4.2 whilst suggested “Improvements” have been presented with the prefix “HR I” and are provided in Section 4.3. Each of the recommended actions in the following subsections has been referred to throughout Section 3 and/or **Appendix 4**. A brief commentary is provided in italics beneath each recommended action to explain the background to the recommended action.

In light of the results of the environmental audit, a total of 11 compliance-based Recommendations and 18 suggested Improvements are provided for the Company’s consideration and action.

### 4.2 Recommendations Arising from Non-Compliances

**HR R1/25** All exceedances, including minor exceedances, should be recorded and reported as a non-compliance within relevant reporting and reported as an incident if applicable. Where appropriate, review and revision of the methods / calculation should be undertaken to provide a more definitive result and reporting re-issued with the corrected results.

*Due to high ambient noise levels, the contribution of the Quarry operations had to be extrapolated at three locations for the December 2024 and June 2025 noise monitoring. Calculated results were 2dB(A) and 1dB(A) above criteria for Receiver R8. Whilst the noise monitoring report states that operations were compliant it is considered that this remains an exceedance. It was advised that the calculations were complete assuming equipment was located at surface, however, most noise sources are located within the extraction area with substantial topographic shielding and that if this was taken into account compliance would likely have been predicted.*

**HR R2/25** The depth of extraction should comply with the currently approved Maximum Extraction Depth map.

*Whilst a process is in place (Section 5.2.2 of the SWMP) to guide extraction to remain at or above the maximum extraction depth, based on the 2025 survey extraction levels in Cells 1a to 2b appear to be down to approximately 120m AHD whilst the 2023 approved Maximum Extraction Depth Map contour in this area appears to be 128m AHD. It is advised that groundwater levels in the new bore BH07 demonstrate that the groundwater level is much lower and that the Maximum Extraction Depth Map requires update. Notwithstanding, it remains important to comply with all conditions as currently approved.*

**HR R3/25** Surveys of the completed extraction depth should be overlain over the maximum extraction depth mapping to demonstrate the final extraction depth is compliant with the approved maximum extraction depth.

*Whilst a process is in place (Section 5.2.2 of the SWMP) to guide extraction to remain at or above the maximum extraction depth, the survey information provided was not in a form that could definitively confirm compliance with approved extraction depths. It is noted that additional surveys are not suggested, rather the existing survey data be presented in a manner to assist interpretation. For example, approved maximum extraction contours could be displayed in blue, final extraction depths in green and in progress contours in black, all with elevations in m AHD.*

**HR R4/25** Water level data loggers should be installed in on-site dams or an amendment sought to DA Condition 3(16d) to remove this requirement.

*Water level data loggers have been installed in groundwater bores, however Condition 16 (d) requires that loggers also be installed in on-site dams. It is acknowledged that the condition refers to groundwater management and that the Company has consulted with DPHI regarding this matter (with no response received to date). Until such time as this condition of the DA is amended or DPHI confirm in formal correspondence that loggers are not required compliance is required.*

**HR R5/25** DPHI should be consulted to confirm the requirement to record the unladen truck movement entry/exit times and, if required, an appropriate system implemented.

*The current systems in place provide for recording of laden truck movements times as they cross the weighbridge, however, it does not provide for recording of the unladen movement time. Whilst the intent of DA Schedule 3 Condition 26 is to maintain accurate records of all laden movements it also specifies the requirement to record time of arrival and dispatch indicating the time of the unladen movement is also required to be recorded. In this case further upgrades to the current system will be required.*

**HR R6/25** The unapproved November 2022 Biodiversity and Rehabilitation Management Plan (BRMP) should be updated to:

- address matters previous raised by the (then) Environment and Heritage Group;
- incorporate any required changes following the September 2023 MOD6 approval; and
- to include a rehabilitation strategy for the next 3-year period.

*The BRMP has not been revised since receipt of comments in 2022. Review and update of the BRMP is required to ensure compliance with the requirements of DA Condition 3(36g) and 5(5).*

**HR R7/25** The Department should be formally notified of all reviews of the Environmental Management Strategy and associated management plans in accordance with DA *Schedule 5 Condition 5*.

*A total of 21 'incident' reports were submitted during the audit period. It is noted that incident reports from 16 May 2024 onwards included a note that the AQMP was under review and revision in consultation with EPA. However, previous reports did not include this, and it would be preferable to clearly identify that the review has been completed in accordance with Schedule 5 Condition 5.*

*It is acknowledged that the incidents were not caused by Quarry activities and updates to the EMS and associated management plans were not likely required.*

**HR R8/25** The Department should be notified immediately (in the manner agreed with the Department) of incidents and incident reports should specify when the Company became aware of the incident.

*During the audit period a total of 21 'incidents' were recorded during the audit period. Whilst incident reports were submitted as relevant these were submitted "to provide the specific details of the dust deposition exceedance as required by Conditions 9 and 10, Schedule 5". Whilst it is acknowledged that the reports were likely provided the same day as becoming aware of the exceedance this does not technically meet the requirement to immediately notify.*

**HR R9/25** A review should be undertaken of opportunities to reduce tracking / visible deposition of fines on the Quarry access road and intersection and identified actions implemented. This may include sealing of the truck pull over area on Haerses Road near the intersection with Wisemans Ferry Road.

*Minor tracking / deposition was observed on the exit side of the access road. This appears to primarily be originating from an unsealed truck pull over area on Haerses Road near the intersection with Wisemans Ferry Road (Photos E1022C\_003, 008 to 011).*

**HR R10/25** The EPA should be requested to vary the conditions of EPL 12513 to update special Condition U1 regarding the air quality monitoring and assessment to reflect the agreed actions and update implementation timeframes as appropriate. (see also **Improvement HR I1/25**).

*A special condition was included in EPL 3916 12 September 2024 requiring a range of actions to assess air quality, implement a monitoring program and prepare an assessment report on the outcomes of the monitoring. Whilst the Company and its consultants submitted an assessment and program justifying alternative monitoring for EPA's review (in compliance with the requirements) EPA has not responded for >12months. This has resulted in an administrative non-compliance. In the event that EPA agree to the revised monitoring approach, this should also be reflected in the conditional requirements.*

**HR R11/25** The Occupation Certificate for the Sandstone Cutting Shed should be sought as soon as possible to ensure compliance.

*It was identified that the final occupation certificate had not yet been issued. Whilst no environmental concerns were noted in the construction and use of the Sandstone Cutting Shed and hence the non-compliance is considered administrative, it remains important to comply with all statutory requirements.*

## 4.3 Suggested Improvements

**HR I1/25** The dust diary, recording actions during dry and windy conditions, should be implemented as soon as practicable.

*Whilst the draft updated Air Quality Management Plan remains with EPA for review, the Company advises that the dust diary procedure is planned to be incorporated into the daily and end of shift procedure/record keeping. This action is supported and this improvement included to provide a means to track implementation.*

**HR I2/25** Prior to commencement of earthworks near the eastern boundary of Stage 1, the boundary markers should be painted or highlighted (e.g. with high visibility PVC piping) to improve visibility from earthmoving equipment.

*The eastern boundary of Stage 1 is currently inaccessible to mobile equipment. Whilst star pickets are present and visible on foot, they would likely be obscured from mobile equipment (Photos E1022C\_040 and 041).*

**HR I3/25** The Maximum Extraction Depth Map should be inserted into the Soil and Water Management Plan and/or cross references updated.

*The Maximum Extraction Depth Map was not attached following the Appendix 3 cover page of the SWMP available via the Dixon Quarry Group website.*

**HR I4/25** Following the next update to the Code and subsequent re-induction program, a copy of the Code should be signed by a representative of the Company and the nominated driver, with a copy of the Code and all attachments held by both the Company and the driver.

*It is important that all drivers sign a copy of the Site Induction and are given a full set of all documents.*

**HR I5/25** All 'historical' waste present on site should be removed and disposed of at an appropriate waste facility.

*A range of waste from non-quarry sources has been collected on site near the site office (Photo E1022C\_027) and around the old house south of Stage 1. Whilst not generated by Quarry activities, all wastes within the Quarry site should be managed and appropriated disposed of.*

**HR I6/25** Section 7.0 of the Environmental Management Strategy should be updated to include guidance regarding the review of the Environmental Management Strategy and management plans following submission of an incident report. Alternatively, the Incident Register Form could be updated to include additional prompts or checklists.

*Whilst the EMS notes the requirement to review the EMS and management plans within other sections, Section 7.0 which addresses incidents, does not include a component specifying the process to review and formally notify the Department of this review following submission of an incident report.*

**HR I7/25** Covered waste receptacles should be utilised whenever they are utilised outside of covered areas and receive waste materials that may have residual hydrocarbons (or other chemicals).

*Whilst no leakage was observed, uncovered skips were utilised within the extraction area to receive wastes including oily rags and empty grease cartridges (Photo E1022C\_102). This presents a risk of contaminated water should the skip not be watertight.*

**HR I8/25** Where reporting is undertaken against the EPL PM<sub>10</sub> criteria of 42µg/m<sup>3</sup> this should be compared to the rolling 24hr average PM<sub>10</sub> in accordance with EPL Condition M2.3.

*The CBased monitoring reports appended to the Annual Reviews report against daily PM<sub>10</sub> results rather than rolling 24-hour average PM<sub>10</sub> results. This has resulted in reporting of compliance with the criteria when it was actually exceeded.*

**HR I9/25** The AQMP should be updated as appropriate to reflect relevant outcomes / updates to air quality management and monitoring arising from the assessment and monitoring program required by EPL 12513 Condition U1. If required, EPA should be requested to reference the AQMP required by DA 165-07-2005 rather than requiring a separate document be prepared for ongoing management / monitoring.

*Whilst EPA have requested the assessment and monitoring program, the management and monitoring outcomes should ideally be managed through a single document to remove redundancy and potential for inconsistencies. It is noted that updates to the AQMP required by DA 165-07-2005 are required to be undertaken in consultation with EPA and therefore this should be a streamlined process.*

**HR I10/25** The logbook form for WALs 25942 and 25956 should be updated to remove the columns relating to conditions met for water take (which WaterNSW have confirmed do not apply) and a note added referencing Water NSW's correspondence confirming the dams are "runoff harvesting dams". The calculation for water volume should also be included in the row headers or the volume taken each time filled out.

*Water NSW has previously confirmed that flow conditions (and hence cease to take) do not apply to the WALs, however, the logbooks still include columns to check cease to take conditions which adds confusion. A volume taken column is also included which appears to be automated (digitally), however, as the logbooks are filled out in hard copy the calculation should be included in the row header (as individual calculations weren't filled out for WAL25942).*

**HR I11/25** The Company should seek advice from Water NSW regarding the application of *Water Management (General) Regulation 2025* and how it relates to Condition MW8583-00001(D) of WAL25941 and WAL25956.

*Whilst the mandatory meeting equipment condition under the Water Management (General) Regulation 2018 does not apply until 1 December 2026 for works within the Greater Metropolitan Region Unregulated Water Sources, this regulation has been superseded by the Water Management (General) Regulation 2025 which does not provide a specific date.*

**HR I12/25** All monuments above the groundwater piezometers should be identified with a more permanent reference to the monitoring number.

*Whilst all monuments inspected during the audit were observed to be labelled, some were labelled with felt pen, some were rusting or fading/wearing. A more permanent marking, such as engraving, would be preferable.*

**HR I13/25** A map of all current soil stockpiles should be prepared with each stockpile labelled and approximate volume noted. Signage should also ideally be placed at the soil stockpile.

*No documentation was available to confirm soil stockpile locations and volumes available. One soil stockpile was observed (Photo E1022C\_121) though this was not signed and needed to be pointed out as a stockpile rather than area of rehabilitation. Soil material is a valuable rehabilitation resource and should be tracked and managed.*

**HR I14/25** All documentation relied upon on site with respect to environmental and other matters should include relevant document control information including the computer file path, date created and review date.

*Most of the documentation sighted during the audit didn't include sufficient document control information to assist in locating the document on the Company's server, whether it is the current version and when it should be reviewed. The progressive introduction of document control will assist in improved management of documentation on site. It is important to clarify differences for documentation for either Old Northern Road Quarry or Haerses Road Quarry.*

**HR I15/25** During the next review and update of the Environmental Management Strategy and associated management plans updated figures should be prepared showing the latest aerial photography.

*The current EMS and management plans principally include figures with aerial photography dated 2017 and 2022. Whilst not required for compliance, as a management tool it is helpful to see approved boundaries and monitoring locations etc in the context of the current site status.*

**HR I16/25** The description and mapping within Section 3 of the Soil and Water Management Plan should be updated to reflect the current water management system and update the future water management system.

*Section 3 describes the current water management system as of 2022, i.e. prior to commencement of extraction within Cells 1a to 3b and the construction of Stage 2 West Sediment Dam. Figures 3.1 and 3.3 also utilise an aerial photo base map dated 2017. Whilst no water management issues were noted during the audit, it is preferable to ensure that management plans are as up to date as possible.*

**HR I17/25** A review of the Company's system for reviewing / managing compliance items should be undertaken and updates made as needed that provide for practical system implementation. This may involve updates to the Monthly Site Condition Check List and/or utilisation of other internal systems.

Whilst the Monthly Site Condition Check List is comprehensive, additional operational management commitments and/or details could be included / clarified (e.g. around maximum extraction depth checks which cannot simply be confirmed through visual inspection) or alternatively managed through a separate system. It is noted that some aspects of the checklist are more appropriately completed as a desktop exercise (which may not be required monthly) whilst others require on-ground confirmation. Notwithstanding this suggested improvement, the Company's efforts through the existing system are commendable.

**HR I18/25** CBased should be requested to include additional tabs in the monthly monitoring data summary spread sheet which include:

- each 15 minute PM<sub>10</sub> result; and
- each rolling 24-hour average PM<sub>10</sub> results (each 15 minutes).

Tabs including the meteorological data averaged at the time intervals outlined in EPL Condition M4.1 should also be preferentially provided so that the Company does not need to generate these for compliance.

*The monitoring data supplied by CBased on a monthly basis provides a useful summary. The raw data collected by the TEOM and Meteorological Station collect the information required for compliance, however, data is not provided to the Company in the format / with averaging periods required by EPL 12513.*

# Appendices

- Appendix 1 Planning Secretary Audit Team Agreement
- Appendix 2 Independent Audit Declaration Form
- Appendix 3 Consultation with Government Agencies and Community Consultative Committee
- Appendix 4 Compliance Review – Approvals
- Appendix 5 Site Inspection Photographs
- Appendix 6 Status of Implementation of 2022 Audit Response Actions
- Appendix 7 Document Reference Table

# Appendix 1

## Planning Secretary Audit Team Agreement

(Total No. of pages including blank pages = 3)

Hunny Churcher  
Environmental Advisor  
Dixon Sand (NO. 1) Pty Ltd  
ABN 72628957086  
4610 Old Northern Road  
Maroota NSW 2756

23/10/2025

---

Sent via the Major Projects Portal only

Subject: Haerses Road Quarry - 2025 Independent Audit Team Nomination

Dear Hunny,

I refer to your request for the Planning Secretary's endorsement (DA165-7-2005-PA-84) of a suitably qualified, experienced, and Independent Audit Team for the 2025 Independent Environmental Audit (**2025 IEA**) of Haerses Road Quarry, submitted as required by Schedule 5, Condition 13 of DA165-7-2005 as modified (**Consent**) to NSW Department of Planning, Housing and Infrastructure (**NSW Planning**) on 17 October 2025.

NSW Planning has reviewed the Independent Audit Team nomination and based on the information you have provided is satisfied that the proposed team is suitably qualified, experienced, and independent.

Consequently, as nominee of the Planning Secretary, I endorse the appointment the following audit team from R W Corkery & Co: Pty Ltd:

- Scott Hollamby - Lead Auditor
- Sam Wells - Assistant Auditor

The nomination of Scott Hollamby as Lead Auditor for the 2025 IEA of Haerses Road Quarry was initially approved by NSW Planning on 20 March 2025 (DA165-7-2005-PA-77).

Please ensure that a copy of this correspondence is included in the IEA appendices.

The IEA must be prepared, undertaken, and finalised in accordance with Schedule 5, Conditions 13 and 14 of the Consent. Failure to meet these requirements will require revision and resubmission of the IEA Report. The endorsed Lead Auditor must also attend the site inspection at the project that forms a part of the IEA.

While not a conditioned requirement, NSW Planning recommends that the IEA also be undertaken in accordance with the *Independent Audit Post Approval Requirements* (Department 2020) (IAPAR).

Please note that this is an endorsement for the audit team detailed above for this IEA only. If there are any changes to the project's auditor, a new request must be submitted and endorsed by the Planning Secretary prior to commencement of the IEA.

For each future IEA, you must submit a new request for the Planning Secretary's endorsement.

Please also note that this endorsement is for DA165-7-2005 as modified only, and each such request across different projects is assessed on the merits of the proposed auditor and the requirements of each project.

Endorsement for an audit team on one project does not necessarily guarantee their suitability for endorsement on another. NSW Planning nevertheless reserves the right to request and alternative auditor or audit team for future audits, should it be appropriate in the circumstances.

Should you wish to discuss the matter further, please contact Nicole Slezak, (Compliance Officer) at [compliance@planning.nsw.gov.au](mailto:compliance@planning.nsw.gov.au).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Julia Pope', is positioned above the typed name.

Julia Pope  
Team Leader Compliance - Metro  
Compliance

As nominee of the Planning Secretary

# Appendix 2

## Independent Audit Declaration Forms

(Total No. of pages including blank pages = 3)

## DECLARATION OF INDEPENDENCE FORM

Project Name:	Haerses Road Quarry – Maroota
Consent Number:	DA165-7-2005
Description of Project:	Sand Extraction and Processing Operation
Project Address:	45 Haerses Road, Maroota NSW 2756
Proponent:	Dixon Sand Pty Ltd
Audit Date:	20 March 2025
<p>I declare that:</p> <p>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;</p> <p>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;</p> <p>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;</p> <p>iv. I am not an Environmental Representative for the project; and</p> <p>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.</p> <p>Notes:</p> <p>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</p> <p>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).</p>	
Name of Proposed Auditor:	Scott Hollamby
Signature:	
Qualification:	B.EnvSc (Hons) Lead Auditor (Environmental Management Systems) No. 109260
Company:	R.W. Corkery & Co. Pty Limited

## DECLARATION OF INDEPENDENCE FORM

Project Name:	Haerses Road Quarry – Maroota
Consent Number:	DA165-7-2005
Description of Project:	Sand Extraction and Processing Operation
Project Address:	45 Haerses Road, Maroota NSW 2756
Proponent:	Dixon Sand Pty Ltd
Audit Date:	30 October 2025
<p>I declare that:</p> <ul style="list-style-type: none"> <li>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;</li> <li>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;</li> <li>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;</li> <li>iv. I am not an Environmental Representative for the project; and</li> <li>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.</li> </ul> <p>Notes:</p> <ul style="list-style-type: none"> <li>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</li> <li>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).</li> </ul>	
Name of Proposed Auditor:	Sam Wells
Signature:	
Qualification:	B.EnvScMgt
Company:	R.W. Corkery & Co. Pty Limited

# Appendix 3

## Consultation with Government Agencies and Community Consultative Committee

(Total No. of pages including blank pages = 15)



## Consultation

---

**From** Nicole Slezak <nicole.slezak@dpie.nsw.gov.au>

**Date** Wed 2025-10-22 4:11 PM

**To** Scott Hollamby <scott@rwcorkery.com>

You don't often get email from nicole.slezak@dpie.nsw.gov.au. [Learn why this is important](#)

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Hi Scott,

Thank you for your email indicating the auditor amendment has been lodged. I can confirm we have received the task which is now being actioned.

In addition to the requirements captured by the Consent and the Department's *Independent Audit Post Approval Requirements* (May 2020), please ensure any issues with the dust deposition gauges are addressed as previously discussed with my colleague Gil Bloxham.

If you have any questions or concerns regarding the above, please feel free to contact me.

Kind regards,

**Nicole Slezak**

**Compliance Officer**

Compliance | Department of Planning, Housing and Infrastructure

**P:** 0437 214 910 | **E:** [nicole.slezak@dpie.nsw.gov.au](mailto:nicole.slezak@dpie.nsw.gov.au) |

4PSQ, Parramatta NSW 2150

[www.dpie.nsw.gov.au](http://www.dpie.nsw.gov.au)



*The Department of Planning and Environment acknowledges that it stands on Aboriginal land. We acknowledge the traditional custodians of the land, and we show our respect for elders past, present and emerging through thoughtful and collaborative approaches to our work, seeking to demonstrate our ongoing commitment to providing places in which Aboriginal people are included socially, culturally and economically.*

Good Morning Giles,

Apologies if you receive this email multiple times. I keep getting bounce backs.

Many thanks



**Scott Hollamby**

Senior Environmental Consultant

☎ 0437 858 511

✉ [scott@rwcorkery.com](mailto:scott@rwcorkery.com)

🌐 [www.rwcorkery.com.au](http://www.rwcorkery.com.au)

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**From:** Scott Hollamby

**Sent:** Monday, 20 October 2025 8:09 AM

**To:** 'giles.bloxham@dpi.nsw.nsw.gov.au' <giles.bloxham@dpi.nsw.nsw.gov.au>

**Cc:** Sam Wells <samw@rwcorkery.com>

**Subject:** 1021/1022: 2025 Old Northern Road and Haerses Road - Endorsement Request & Consultation

Good Morning Gil,

Please see attached the endorsement requests for the additional audit team member, Sam Wells, for the 2025 Independent Environmental Audits of the Old Northern Road and Haerses Road Quarries. I believe that Dixon Sand submitted these via the Major Project Portal end of last week.

As discussed, given the passage of time since my endorsement, I am also seeking any additional comments that DPHI wish to see addressed as part of the audits.

Please don't hesitate to give me a call if you would like to discuss any matter.

Many thanks



**Scott Hollamby**

Senior Environmental Consultant

☎ 0437 858 511

✉ [scott@rwcorkery.com](mailto:scott@rwcorkery.com)

🌐 [www.rwcorkery.com.au](http://www.rwcorkery.com.au)

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Our ref: DOC25/881627-1

R.W. Corkery & Co. PTY LTD  
PO Box 1796  
CHATSWOOD NSW 2057

By email: [admin@rwcorkery.com](mailto:admin@rwcorkery.com)

Attention: Scott Hollamby

27 October 2025

### **Consultation for Independent Audits of Old Northern Road & Haerses Road Quarries**

I refer to your letter dated 15 October 2025 regarding consultation with the NSW Environment Protection Authority (EPA) on the independent environmental audits of the Old Northern Road & Haerses Road Quarries. The EPA understands R.W. Corkery & Co. Pty Limited has been approved by the Department of Planning, Housing and Infrastructure as the auditor to undertake independent environmental audits of the quarries in accordance with Schedule 5, Condition 13 of Development Consents DA 250-09-01 and DA 165-7-2005.

The EPA regulates scheduled activities at 4610 Old Northern Road, Maroota, NSW, 2756 and Haerses Road and intersection of Wisemans Ferry Road, Maroota, NSW, 2756 under Environment Protection Licences 3916 and 12513 respectively, issued pursuant to section 48 of the *Protection of the Environment Operations Act 1997* (the Act). The EPA has no specific comments on the scope of the audit, noting that activities at the Premises must comply with the conditions of the licence and the requirements of the Act and associated regulations.

A review of EPA records shows the quarries have held their respective Environment Protection Licence for the entire audit period of 19 October 2022 to date, and the licensee has not reported any non-compliances with the conditions of EPL 3916 or 12513 in any annual returns submitted for the audit period. The EPA is aware that there are ongoing self-reported issues associated with dust exceedances at both premises' air monitoring stations, however it is acknowledged there have been external factors contributing to these exceedances.

Relevant notices and information associated with the Licences are available via the EPA's public register: <https://app.epa.nsw.gov.au/prpoeoapp/>.

If you have any questions in relation to this matter, please contact Michael Simpson on (02) 8275 1464 or at [michael.simpson@epa.nsw.gov.au](mailto:michael.simpson@epa.nsw.gov.au).

Yours sincerely

Felicity Bain  
**Unit Head - Operations**  
**NSW Environment Protection Authority**

27 October 2025

Our ref: OUT25/13722

Name: Scott Hollamby  
Address: R. W. Corkery & Co.  
Email: [scott@rwcorkery.com](mailto:scott@rwcorkery.com)

22/10/2025

---

Subject: Old Northern and Hearses Road Quarries - Independent Environmental Audit - DA 250-09-01 and DA 165-7-2005

Dear Scott Hollamby,

I refer to your request seeking advice from the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group on an upcoming audit for the above matter. It is understood this consultation is in accordance with conditions of approval for the project.

NSW DCCEEW Water Group understands that the scope of the audit as outlined under the development consent and the reference guideline, "Independent Audit Post Approval Requirements (2020)" extends to at least the following:

- Identification of compliance requirements and documentation of any non-compliances.
- Assessment of the adequacy and implementation of management plans and sub plans.
- Assessment of compliance against relevant regulatory requirements and legislation.
- Assessment of compliance between actual and predicted impacts in the environmental assessment.
- Reporting requirements for management plans.
- Identification of strengths of the project in environmental management and opportunities for improvement.

NSW DCCEEW Water Group requests that the audit address compliance with the following specific elements of the consent conditions and related legislative requirements in a manner consistent with the above audit scope:

- The requirement to prepare and implement management plans that relate to water sources and their dependent ecosystems and users, and associated impact management and mitigation. These plans may include:
  - Water Management Plans and related sub-plans e.g., Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface and Groundwater Management Plan.

- Extraction Plans and related sub-plans e.g., Water Management Plan, Subsidence Management Plan.
- The requirement to prepare and implement trigger action response plans for water source impacts which set clearly defined limits and actions. This is to be reported on within annual and exceedance-based reporting.
- Water supply availability is clearly defined for the project.
- Water take at the site via storage, diversion, interception or extraction is clearly documented and is authorised by a relevant Water Access Licence or exemption under the Water Management (General) Regulation 2025.
- Water metering at the site is in accordance with the NSW Non-Urban Metering Framework where relevant.
- Water Access Licence/s used to account for water take by the project nominates the work where the water is being taken from.
- Annual reporting clearly documents; 1) water take, use and water source impacts, 2) compares results with previous years, and 3) identifies exceedances and how these are managed/mitigated.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at [water.assessments@dcceew.nsw.gov.au](mailto:water.assessments@dcceew.nsw.gov.au)

Yours sincerely,

A handwritten signature in black ink, appearing to read "Alistair Drew".

Alistair Drew  
A/ Senior Project Officer  
Water Assessments  
NSW Department of Climate Change, Energy, the Environment and Water



---

**From** Simon Turner <Simon.Turner2@transport.nsw.gov.au>

**Date** Thu 2025-10-16 9:11 AM

**To** Scott Hollamby <scott@rwcorkery.com>

**Cc** Environment <environment@dixonsand.com.au>; Sam Wells <samw@rwcorkery.com>

**Caution:** *This email is from outside our organisation. Be cautious with all links and attachments. Do not click on any links or open any attachments unless you are certain of the sender's identity.*

Good morning,

I refer to your email below and correspondence dated 15 October 2025 seeking TfNSW comment on the intension to carry out an independent audit in relation to the Old Northern Road and Haerses Road Quarries. It is noted that the audit period will cover the period between 19 October 2022 and end of October 2025.

TfNSW requests that the audit addresses the operation of the quarries against the relevant traffic management plans / operation plans.

Please submit the audits to [Development.Sydney@transport.nsw.gov.au](mailto:Development.Sydney@transport.nsw.gov.au) when they are ready for review.

Regards,

**Simon Turner**

Land Use Planner

Transport Planning

Planning, Integration and Passenger Division

**Transport for NSW**

T (02) 8265 6363 E [simon.turner2@transport.nsw.gov.au](mailto:simon.turner2@transport.nsw.gov.au)

[transport.nsw.gov.au](http://transport.nsw.gov.au)

Level 4, 4 Parramatta Square, 12 Darcy Street, Parramatta NSW 2150

**Working days** Monday to Thursday



**Transport  
for NSW**

SYD25-01276 - Haerses Sand Quarry - Haerses Road, Maroota

SYD24-00660 - Dixon Sand Quarry Old Northern Road, Maroota

OFFICIAL

**Subject:** 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

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Dear Sir/Madam,

Please see attached letter in relation to consultation for the upcoming 2025 Independent Environmental Audits of the Old Northern Rod and Haerses Road Quarries.

Kind regards



**Scott Hollamby**

Senior Environmental Consultant

☎ 0437 858 511

✉ [scott@rwcorkery.com](mailto:scott@rwcorkery.com)

💻 [www.rwcorkery.com.au](http://www.rwcorkery.com.au)

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Scott,

Thank you for the opportunity to comment on your upcoming Independent Environmental Audit for Dixon Sand in regard to DA 250-09-01 and DA 165-7-2005.

The two key issues raised are:

1. Ensure that all setback areas are marked with survey markers or similar and that works have not encroached into the setback areas; and
2. The maintenance of landscape screening around the site.

I would request that these matters be reviewed as part of your audit.

Please note that in general terms, compliance with all conditions of consent is required.

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  
+61 2 9843-0319 | [kmckenzie@thehills.nsw.gov.au](mailto:kmckenzie@thehills.nsw.gov.au)  
Administration Centre, 3 Columbia Court Norwest NSW 2153  
PO Box 7064, NORWEST NSW 2153

[www.thehills.nsw.gov.au](http://www.thehills.nsw.gov.au)

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---

Re: 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

---

From Lisa Andrews <lisaandrews.ic@gmail.com>

Date Wed 29/10/25 11:27 AM

To Scott Hollamby <scott@rwcorkery.com>

You don't often get email from lisaandrews.ic@gmail.com. [Learn why this is important](#)

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Hi Scott, just letting you know that I did not receive any additional requests from CCC members for inclusion in the IEA.

I have been advised by the Hills Council delegate on the CCC that RW Corkery contacted them separately and they have provided comments back to you.

Regards

Lisa

Lisa Andrews  
Independent Chairperson &  
Director  
Articulate Solutions Pty Ltd  
t: 0401 609 693  
e: [lisaandrews.ic@gmail.com](mailto:lisaandrews.ic@gmail.com)

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On Wed, Oct 15, 2025 at 11:24 AM Scott Hollamby <[scott@rwcorkery.com](mailto:scott@rwcorkery.com)> wrote:

Dear Lisa,

Please see attached letter in relation to consultation for the upcoming 2025 Independent Environmental Audits of the Old Northern Rod and Haerses Road Quarries.

Please don't hesitate to call me if you would like to discuss any matter.

Many thanks

**Scott Hollamby**

Senior Environmental Consultant

0437 858 511

[scott@rwcorkery.com](mailto:scott@rwcorkery.com)

[www.rwcorkery.com.au](http://www.rwcorkery.com.au)

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**AREQ0068799 | 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request**

---

**From** NSW Resources <info@sys.resources.nsw.gov.au>  
**Date** Wed 15/10/25 1:29 PM  
**To** Scott Hollamby <scott@rwcorkery.com>  
**Cc** cau@regional.nsw.gov.au <cau@regional.nsw.gov.au>

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Dear Scott Hollamby,

Thank you for your enquiry.

The NSW Resources Regulator Mining Act Inspector, regulates minerals listed under Schedule [1](#) and [2](#) of the [Mining Regulation 2016](#).

Our records show that **Old Northern and Hearses Road Quarries** is a construction materials quarry and is only regulated under WHS Act by the Resources Regulator - Mine Safety Inspectorate / CAU. Therefore are not regulated by Mining Act Inspectorate and outside of our jurisdiction.

The NSW Resources Regulator Mining Act Inspector, has no comment.

Regards

**Compliance Coordination Unit**

Mining Act Inspector (MAI) - NSW Resources Regulator (RR)

NSW Resources | Department of Primary Industries and Regional Development (DPIRD)

Postal Address: PO Box 344, HRMC 2310 NSW

**All MAI enquiries - 1300 814 609 (Option 2 then 5) or [nswresourcesregulator@service-now.com](mailto:nswresourcesregulator@service-now.com).**

**\*\* All Mining Act forms and applications are to be lodged online at Regulator Portal**

<https://portal.resources.nsw.gov.au>



 [Department Regional NSW](#)

*The Department of Primary Industries and Regional Development acknowledges that it stands on Country which always was and always will be Aboriginal land. We acknowledge the Traditional Custodians of the land and waters, and we show our respect for Elders past, present and emerging. We are committed to providing places in which Aboriginal people are included socially, culturally and economically through thoughtful and collaborative approaches to our work.*



Report an incident or injury  
**1300 814 609**



received from: scott@rwcorkery.com

Dear Sir/Madam,

Please see attached letter in relation to consultation for the upcoming 2025 Independent Environmental Audits of the Old Northern Road and Haerses Road Quarries.

Kind regards

[A logo with white text Description automatically generated]  
Scott Hollamby

Senior Environmental Consultant

[Receiver with solid fill]

0437 858 511

[Envelope with solid fill]

scott@rwcorkery.com <mailto:scott@rwcorkery.com>

[Internet with solid fill]

[www.rwcorkery.com.au](http://www.rwcorkery.com.au) <<http://www.rwcorkery.com.au/>>

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**RE: 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request**

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**From** Environmental Assessments <Environmental.Assessments@waternsw.com.au>  
**Date** Wed 15/10/25 12:33 PM  
**To** Scott Hollamby <scott@rwcorkery.com>  
**Cc** Environment <environment@dixonsand.com.au>; Sam Wells <samw@rwcorkery.com>

**Caution:** *This email is from outside our organisation. Be cautious with all links and attachments. Do not click on any links or open any attachments unless you are certain of the sender's identity.*

Dear Scott

Thank you for again keeping WaterNSW in the loop with regards to the development and independent audit.

I can confirm that WaterNSW still has no interests in the lands surrounding the quarries and we have no specific comment.

Kind Regards

**Justine Clarke (She/ her)**

**WaterNSW**

A/ Environmental Planning Assessments & Approvals Manager

0457 535 955

---

**From:** Scott Hollamby <scott@rwcorkery.com>  
**Sent:** Wednesday, 15 October 2025 10:18 AM  
**To:** Environmental Assessments <Environmental.Assessments@waternsw.com.au>  
**Cc:** Alison Kniha <Alison.Kniha@waternsw.com.au>; Environment <environment@dixonsand.com.au>; Sam Wells <samw@rwcorkery.com>  
**Subject:** [EXTERNAL] 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

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Dear Sir/Madam,

Please see attached letter in relation to consultation for the upcoming 2025 Independent Environmental Audits of the Old Northern Rod and Haerses Road Quarries.

I note that Water NSW confirmed in 2022 that they do not own or manage interests in these sites, however, given the passage of time wish to provide a further opportunity for input if desired.

Kind regards

## **Scott Hollamby**

Senior Environmental Consultant

0437 858 511

[scott@rwcorkery.com](mailto:scott@rwcorkery.com)

[www.rwcorkery.com.au](http://www.rwcorkery.com.au)

*Exemplar Global (ISO 14001:2015) Lead Auditor:*

*R.W. Corkery & Co. and our staff are proud members or supporters of:*



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# Appendix 4

## Compliance Review – Approvals

(Total No. of pages including blank pages = 79)

Table A4-1 DA 165-7-2005

Table A4-2 EPL 12513

Table A4-3 WAL 25941

Table A4-4 WAL 25956

**Table A4-1**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS</b>				
<b>OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT</b>				
1	In addition to meeting the specific performance measures and criteria established under this consent, the Applicant must implement all reasonable and feasible measures to prevent or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.	Compliant	Observations Reviewed management documentation This audit	Whilst this audit has recommended a range of improvements, the Company generally appears to be adequately implementing reasonable and feasible measures to prevent or minimise the potential for environmental harm.
<b>TERMS OF CONSENT</b>				
2	The Applicant must carry out the development:			
2 (a)	generally in accordance with the EIS, EA (Mod 1), EA (Mod 2), MR (Mod 3), MR (Mod 4), MR (Mod 5), and (Mod 6); and	Compliant	HR11-2019 HR12-2019 HR13-2019 HR14-2022 HR68-2022 HR69-2022 HR70-2022 HR01-2025 Observations	The Quarry was found to be operating generally in accordance with the operations as outlined in the project descriptions and impact assessments contained within the various assessment documents.
2 (b)	in accordance with the conditions of this consent and the Development Layout Plans. <i>Note: The Development Layout Plan is shown in Appendix 1</i>	<b>Non-compliant</b>	HR02-2025 Observations	The Quarry layout was observed to reflect the Development Layout Plans included as Appendix 1 of DA 167-7-2005. However, several non-compliances have been recorded against the conditions of this consent during the audit period and hence contributed to the non-compliance status for this condition. See Conditions 2(19), 3(3), 3(16)(d), 3(19)(d), 3(26), 3(36)(g), 5(5), and 5(9).
3	If there is any inconsistency between the documents in Condition 2(a), the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this consent shall prevail to the extent of any inconsistency.	-	-	Noted.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>TERMS OF CONSENT (Cont'd)</b>				
4	The Applicant must comply with any written requirement/s of the Secretary arising from the Department's assessment of:	Not Triggered	-	No written requirements relating to these matters arose during the audit period.
4 (a)	any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this consent (including any stages of these documents);			
4 (b)	any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with this consent; and			
4 (c)	the implementation of any actions or measures contained in these documents.			
<b>LIMITS ON CONSENT</b>				
5	The Applicant may carry out quarrying operations on the site until 14 February 2046.	Compliant	-	The approved timing for quarrying operations has not expired.
	Note: Under this consent, the Applicant is required to rehabilitate the site and carry out additional requirements and undertakings to the satisfaction of the Secretary. Consequently, this consent will continue to apply in all respects other than the right to conduct quarrying operations until the rehabilitation of the site and those requirements and undertakings have been carried out to the standard required by the applicable conditions.	Compliant	-	The Quarry remains within the approved operational period.
6	The Applicant must not:	Compliant	HR04-2025 HR05-2025 HR06-2025	Total extraction did not exceed 495,000tpa from the Quarry during the audit period with the following total production reported. <ul style="list-style-type: none"> <li>2022/2023 = 289,769.14t.</li> <li>2023/2024 = 444,021t.</li> <li>2024/2025 = 399,279.60t.</li> </ul>
6 (a)	extract more than 495,000 tonnes of quarry products per year from the quarry; and			

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>LIMITS ON CONSENT (Cont'd)</b>				
6 (b)	Process (through on-site crushing and screening activities) more than 320,000 tonnes of quarry products per year.	Compliant	HR04-2025 HR05-2025 HR06-2025	Total processed materials did not exceed 320,000tpa from the Quarry during the audit period with the following total production reported. <ul style="list-style-type: none"> <li>2022/2023 = 127,038t.</li> <li>2023/2024 = 256,266t.</li> <li>2024/2025 = 210,904.60t.</li> </ul>
7	The Applicant must not transport more than 190,000 tonnes of quarry products per year to the Old Northern Road Quarry for processing.	Compliant	HR04-2025 HR05-2025 HR06-2025	Total products transported to the Old Northern Road Quarry did not exceed 190 000tpa from the Quarry during the audit period. <ul style="list-style-type: none"> <li>2022/2023 = 118,385t.</li> <li>2023/2024 = 187,755t.</li> <li>2024/2025 = 188,375t.</li> </ul>
8	"Truck movements at the site (i.e. either arrival or dispatch), including truck movements between the site and the Old Northern Road Quarry, must not exceed: (a) 180 per day; and (b) 20 between 6.00am and 7.00am."	Compliant.	HR04-2025 HR05-2025 HR06-2025 HR67-2025	Truck movement records within Annual Reviews during the audit period and truck movement summary data on the Dixon Sand website indicates compliance with truck movement limits. The number of trucks movements between 6:00am and 7:00am is separately recorded by the weighbridge officer within an Excel spreadsheet (separate to the ClearWeigh software which records total movements).
9	The Applicant must not receive more than 250,000 tonnes of VENM and ENM (in total) at the site in any calendar year. No other materials classified as waste under the EPA's Waste Classification Guidelines 2009 (or its latest version) may be received or processed on the site.	Compliant	HR04-2025 HR05-2025 HR06-2025	Total VENM/ENM material received at the Quarry did not exceed 250,000t during any calendar year during the audit period with nil imported between 2022 and 2025 (to June 2025).
10 10 (a)	The Applicant must: maintain accurate records of all VENM and ENM received at the site (including the date, time and quantity received); and	Not Triggered	HR04-2025 HR05-2025 HR06-2025	No VENM and/or ENM was received by the Quarry between July 2022 and June 2025.
10 (b)	include a copy of this data in the Annual Review.	Not Triggered	HR04-2025 HR05-2025 HR06-2025	The amount of VENM/ENM received at the Quarry is reported in Section 5.4.2 of the Annual Review and a copy of the VENM/ENM Register is included as an appendix to the Annual Reviews. It is noted that no VENM and/or ENM was received by the Quarry between July 2022 and June 2025.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>STRUCTURAL ADEQUACY</b>				
11	<p>The Applicant must ensure that all new buildings and structures, and any alterations or additions to existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA.</p> <p><i>"Notes:</i></p> <ul style="list-style-type: none"> <li><i>Under Part 6 of the EP&amp;A Act, the Applicant is required to obtain construction and occupation certificates for any proposed building works;</i></li> <li><i>The Environmental Planning and Assessment (Development Certification and Fire Safety) Regulation 2021 sets out the requirements for the certification of the development."</i></li> </ul>	<b>Non-Compliant</b>	HR24-2025 Advice from Environmental Officer	<p>During the audit period the Sandstone Cutting Shed, Maintenance Workshop, Site Office, Lunchroom etc was constructed. Approvals for the Operation of a System of Sewage Management issued 20 December 2022 and 6 February 2025 by the Hills Shire Council for the on-site sewage management facilities. Construction certificates were issued by Urban City Certifiers 30 October 2023 for construction of the Sandstone Cutting Shed and Maintenance Workshop. It was advised that the occupation certificates are to be received imminently (following a modification lodged with Urban City Certifiers). <b>Recommendation HR R11/25.</b></p> <p>The Environmental Officer advises that, as the office facilities involved renovation of an existing building a construction certificate was not required.</p>
<b>DEMOLITION</b>				
12	The Applicant must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	Not Triggered	Advice from Environmental Officer	<p>No demolition work was undertaken during the audit period.</p> <p>Previous site office was renovated the audit period but was not demolished.</p>
<b>PROTECTION OF PUBLIC INFRASTRUCTURE</b>				
13	Unless the Applicant and the applicable authority agree otherwise the Applicant must:			
13 (a)	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and	Compliant	HR04-2025 HR05-2025 HR06-2025	<p>Section 94 monthly payment statements included in the 20122/2023, 2023/2024 and 2024/2025 Annual Reviews.</p> <p>No other infrastructure damaged during the audit period.</p>
13 (b)	relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.	Not Triggered	Advice from Environmental Officer	No public infrastructure was required to be relocated during the audit period.

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>OPERATION OF PLANT EQUIPMENT</b>				
14	The Applicant must ensure that all the plant and equipment used at the site, or to monitor the performance of the development is:	Compliant	Sighted plant daily inspection checklists. Sighted vehicle and equipment maintenance records	No issues with plant and equipment maintenance was observed during the audit inspection. Operators are required to complete a daily inspection checklist for plant. Maintenance records indicated regular maintenance of vehicles and equipment, as appropriate and managed utilising maintenance software MEX.
14 (a)	maintained in a proper and efficient condition; and			
14 (b)	operated in a proper and efficient manner.	Compliant.	Observations HR04-2025 HR05-2025 HR06-2025 Advice from Environmental Officer	No inappropriate operations were sighted during the audit inspection. Whilst a number of notices were issued by the Resources Regulator, these related to WHS matters. No incidents were recorded during the audit period where plant or equipment were not operated in a proper and efficient manner from an environmental and approvals perspective.
<b>Section 94 Contribution</b>				
15	The Applicant must pay Council a monthly financial contribution toward the maintenance of local roads used for haulage of quarry products. The contribution must be determined in accordance with The Hills Shire Council Contributions Plan No. 6 Extractive Industries, or any subsequent relevant contributions plan adopted by Council.	Compliant	Remittance records for the audit period sighted.	Monthly records are maintained for daily sales and relevant contribution amount. Records indicate that financial contributions have been made in accordance with the contribution agreement for the Quarry during the audit period.
<b>Production Data</b>				
16	The Applicant must:	Compliant.	HR21-2025 HR22-2025 HR23-2025	Annual Returns containing production data submitted for 2022/2023, 2023/2024 and 2024/2025 periods.
16 (a)	provide calendar year annual quarry production data to MEG using the standard form for that purpose; and			
16 (b)	include a copy of this data in the Annual Review.	Compliant	HR04-2025 HR05-2025 HR06-2025	Production data included in Annual Reviews during the audit period.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>OPERATION OF PLANT EQUIPMENT (Cont'd)</b>				
<b>Compliance</b>				
17	The Applicant must ensure that all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this consent relevant to their respective activities.	Compliant	HR58-2025 Advice from Environmental Officer	All employees and contractors are required to undergo inductions which include the identification of conditions relevant to their positions. Regular toolbox talks are used to highlight key conditions relevant to site personnel and specific environmental toolbox talks are undertaken periodically.
<b>LIMITS OF EXTRACTION</b>				
<b>Buffer Zones</b>				
18	Within 6 months of the determination of Modification 2, the Applicant must:			
18 (a)	engage a registered surveyor to mark out the boundaries of the: <ul style="list-style-type: none"> <li>approved limits of extraction;</li> <li>buffer zones shown in Appendix 2; and</li> <li>MTSGS buffer zone;</li> </ul>	Compliant	HR32-2019.	Dixon Sand engaged McKinlay Morgan and Associates Pty Ltd to survey boundaries at the Quarry.
18 (b)	submit a survey plan of these boundaries to the Secretary; and	Compliant	HR32-2019.	The boundary survey plan was submitted to DPE on 31 August 2018.
18 (c)	ensure that the boundaries of each operational extraction area are clearly marked on site in a permanent manner that allows operating staff and inspecting officers to clearly identify these limits, to the satisfaction of the Secretary.	Compliant	Observations Photos E1022C_040, 041, 053, 068, 074, 075, 078 – 081, 088, 089, 111, 112.	Surveyed star posts and connecting white cord delineating extraction area boundaries were observed during the site inspection. Whilst some fencing at the top of highwalls is failing, these areas are no longer accessible from within the extraction area (and are effectively delineated by the highwall itself). Currently inaccessible boundaries on the eastern perimeter of Stage 1 included star pickets easily identifiable on foot, however, improvement in their visibility will be required prior to earthworks for final landform creation. See <b>Improvement HR I2/2025</b> . Additional internal boundaries were also marked. Discussion with the Operations Manager confirmed that these were for managing the internal staging and a ground disturbance process ensures that internal vs external boundaries are clearly identified prior to any disturbance.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>LIMITS OF EXTRACTION (Cont'd)</b>				
	The Applicant must not undertake any quarrying operations within the buffer zones shown in Appendix 2. <i>Note: This condition does not prevent the construction or maintenance of acoustic bunds shown in Appendix 3.</i>	Compliant	Observations HR80-2022 <b>Figure 1</b>	Quarrying operations are restricted to the designated extraction areas. Disturbance in the Maroota State Forest buffer zone is described in the BRMP as pre-existing disturbance which occurred prior to Dixon Sands' acquisition of the Quarry site.
<b>Maximum Extraction Depth</b>				
19	The Applicant must not undertake any extraction within 2 metres of the highest recorded wet weather groundwater level of both the MTSGS and the SCBGS.	<b>Non-compliant</b>	HR20-2025 HR57-2025 Advice from Environmental Officer	A Maximum Extraction Depth Map was approved by DPE in 2018 and was reviewed by Golder 14 April 2023.  It is advised that Quarry personnel regularly check extraction depth progress using a GPS. Procedures for extraction depth limit checks, including the engagement of surveyors once extraction approaches within 5m of the maximum extraction depth, are outlined in Section 5.2.2 of the SWMP. Surveys of extraction areas have been provided but are not overlain with the approved extraction contours. Review of the survey indicates non-compliance with the 2023 Maximum Extraction Depth map. It is advised that groundwater levels in the new bore BH07 demonstrate the groundwater level is approximately 77m AHD, significantly lower than the current depth of extraction and therefore remaining >2m above the wet weather groundwater level. However, a non-compliance has been recorded as extraction has exceeded the currently approved extraction depth. <b>Recommendations HR R2/25 and HR R3/25.</b>  It is noted that the Maximum Extraction Depth Map is provided on the website and is referenced in the SWMP as Appendix 3, however, the map itself is missing from the SWMP (see <b>Improvement HR I3/25</b> ).
20	Within 6 months of the determination of Modification 1, the Applicant must:	Compliant	As below	All requirements completed by 25 May 2018, i.e. well within 6 months from 22 January 2018.
20 (a)	establish the highest recorded wet weather groundwater levels for the site based on all available local and site-specific groundwater monitoring data; and	Compliant	HR01-2019	Highest recorded wet weather groundwater levels for the site confirmed by Dundon Consulting Pty Limited on 15 May 2018.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)</b>				
<b>LIMITS OF EXTRACTION (Cont'd)</b>				
20 (b)	engage a suitably qualified and experienced person to prepare a Maximum Extraction Depth Map (contour map or similar) for the development to ensure compliance with Condition 19 above and submit this map to the Secretary for approval.  Within 14 days of the approval of the Maximum Extraction Depth Map, the Applicant must submit a copy of the approved map and the supporting groundwater monitoring data to DPE Water.	Compliant  Compliant	HR01-2019  HR01-2019	Maximum Extraction Depth Map prepared by Dundon Consulting Pty Limited. Maximum Extraction Depth Map submitted to DPE on 18 May 2018 and approved on 18 May 2018.  Draft SWMP containing Maximum Extraction Depth Map and groundwater monitoring data submitted to DPI Water on 25 May 2018.
21	The Applicant must comply with the extraction depths specified in the approved Maximum Extraction Depth Map, to the satisfaction of the Secretary.	<b>Non-compliant</b>	HR20-2025 HR57-2025 Advice from Environmental Officer	It is advised that Quarry personnel regularly check extraction depth progress using a GPS. Procedures for extraction depth limit checks, including the engagement of surveyors once extraction approaches within 5m of the maximum extraction depth, are outlined in Section 5.2.2 of the SWMP. Surveys of extraction areas have been provided but are not overlain with the approved extraction contours. Review of the survey indicates non-compliance with the 2023 Maximum Extraction Depth Map. <b>Recommendations HR R2/25 and HR R3/25</b>
22 22 (a)	The Applicant must review and update the Maximum Extraction Depth Map: annually, for the duration of the baseline groundwater monitoring program (see Condition 17 of Schedule 3); and	Compliant	HR14-2025 HR07-2025 HR20-2025 HR04-2025 HR05-2025 HR06-2025	The baseline groundwater monitoring program commenced on 30 July 2018. The groundwater monitoring assessment prepared following this program was submitted to DPE Water on 4 September 2020. The program was approved by NRAR in correspondence dated 25 February 2021 and 24 May 2021 and DPE acknowledged satisfaction with the outcome on 11 June 2021.  The Maximum Extraction Depth Map is dated 14 April 2023. Reviews of the Maximum Extraction Depth Map are noted in Annual Reviews during the audit period.
22 (b)	"within 3 months of the completion of each Independent Environmental Audit (see Condition 13 of Schedule 5), to the satisfaction of the Secretary."	Compliant	HR07-2025 HR20-2025	The Maximum Extraction Depth Map was reviewed by WSP Golder on 14 April 2023 following completion of the 2022 Independent Environmental Audit.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions										
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS</b>														
<b>NOISE</b>														
<b>Hours of Operation</b>														
1	<p>The Applicant must comply with the operating hours set out in Table 1.</p> <p><i>Table 1: Operating hours</i></p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Permissible Hours</th> </tr> </thead> <tbody> <tr> <td>Quarrying operations (excluding truck arrival, loading and dispatch)</td> <td>7.00 am to 6.00 pm Monday to Saturday At no time on Sundays or public holidays</td> </tr> <tr> <td>Truck arrival, loading and dispatch</td> <td>6.00 am to 6.00 pm Monday to Saturday At no time on Sundays or public holidays</td> </tr> <tr> <td>Acoustic bund construction and road and intersection works on Haerses Road and Wisemans Ferry Road</td> <td>8.00 to 5.00 pm Monday to Friday At no time on Saturdays, Sundays or public holidays</td> </tr> <tr> <td>Maintenance</td> <td>At any time, provided that these activities are not audible at any privately-owned residence outside of permissible hours for quarrying operations</td> </tr> </tbody> </table>	Activity	Permissible Hours	Quarrying operations (excluding truck arrival, loading and dispatch)	7.00 am to 6.00 pm Monday to Saturday At no time on Sundays or public holidays	Truck arrival, loading and dispatch	6.00 am to 6.00 pm Monday to Saturday At no time on Sundays or public holidays	Acoustic bund construction and road and intersection works on Haerses Road and Wisemans Ferry Road	8.00 to 5.00 pm Monday to Friday At no time on Saturdays, Sundays or public holidays	Maintenance	At any time, provided that these activities are not audible at any privately-owned residence outside of permissible hours for quarrying operations	Compliant	HR04-2025 HR05-2025 HR06-2025  Spot check despatch records	<p>No complaints regarding noise or operations outside of the approved hours were received during the audit period.</p> <p>A spot check of despatch records (for 16/01/23, 13/12/23, 12/03/24, 03/09/24 and 24/03/25) indicated that the Quarry was operating within approved hours.</p>
Activity	Permissible Hours													
Quarrying operations (excluding truck arrival, loading and dispatch)	7.00 am to 6.00 pm Monday to Saturday At no time on Sundays or public holidays													
Truck arrival, loading and dispatch	6.00 am to 6.00 pm Monday to Saturday At no time on Sundays or public holidays													
Acoustic bund construction and road and intersection works on Haerses Road and Wisemans Ferry Road	8.00 to 5.00 pm Monday to Friday At no time on Saturdays, Sundays or public holidays													
Maintenance	At any time, provided that these activities are not audible at any privately-owned residence outside of permissible hours for quarrying operations													
2	<p>The following activities may be carried out outside the hours specified in Condition 1 above:</p>													
2 (a)	<p>delivery or dispatch of materials as requested by the NSW Police Force or other public authorities; and</p>	Not Triggered	Advice from Environmental Officer	<p>No despatch of materials outside of approved operational hours was requested by a public authority during the audit period.</p>										
2 (b)	<p>emergency work to avoid the loss of lives, property or to prevent environmental harm.</p> <p>In such circumstances, the Applicant must notify the Secretary and affected residents prior to undertaking the activities, or as soon as is practical thereafter.</p>	Not Triggered	Advice from Environmental Officer	<p>No emergency work was required outside of approved operational hours during the audit period.</p>										

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																				
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>																								
<b>NOISE (Cont'd)</b>																								
3	<p>The Applicant must ensure that operational noise generated by the development (excluding acoustic bund construction) does not exceed the criteria in Table 2 at any residence on privately-owned land.</p> <p><i>Table 2: Operational noise criteria dB(A)</i></p> <table border="1"> <thead> <tr> <th rowspan="2">Receiver</th> <th>Day</th> <th colspan="2">Shoulder (6.00 am to 7.00 am)</th> </tr> <tr> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>Aeq</sub> (15 minute)</th> <th>L<sub>A</sub>(max)</th> </tr> </thead> <tbody> <tr> <td>R05, R06</td> <td>41</td> <td>35</td> <td rowspan="4">52</td> </tr> <tr> <td>R03</td> <td>40</td> <td>37</td> </tr> <tr> <td>R13, R14</td> <td>40</td> <td>36</td> </tr> <tr> <td>All other receivers</td> <td>40</td> <td>35</td> </tr> </tbody> </table>	Receiver	Day	Shoulder (6.00 am to 7.00 am)		L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A</sub> (max)	R05, R06	41	35	52	R03	40	37	R13, R14	40	36	All other receivers	40	35	Non-compliant	<p>HR04-2025 HR05-2025 HR06-2025</p>	<p>Attended noise monitoring was undertaken during December 2022, June 2023, December 2023, June 2024, December 2024, and June 2025. Due to high ambient noise levels, the contribution of the Quarry operations had to be extrapolated at three locations for the December 2024 and June 2025 noise monitoring. Calculated results were 2dB(A) and 1dB(A) above criteria for Receiver R8. Whilst the noise monitoring report states that operations were compliant and that the significance of the residual noise level at Receiver R8 is likely negligible, it is considered that this remains an exceedance.</p> <p>It was advised that the calculations were complete assuming equipment was located at surface, however, most noise sources are located within the extraction area with substantial topographic shielding and that if this was taken into account compliance would likely have been predicted (<b>Recommendation HR R1/25</b>).</p> <p>Noise levels during all other Receivers and monitoring events were at or below the relevant criteria.</p>
Receiver	Day		Shoulder (6.00 am to 7.00 am)																					
	L <sub>Aeq</sub> (15 minute)	L <sub>Aeq</sub> (15 minute)	L <sub>A</sub> (max)																					
R05, R06	41	35	52																					
R03	40	37																						
R13, R14	40	36																						
All other receivers	40	35																						
	Noise generated by the development must be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the <i>NSW Noise Policy for Industry</i> . Appendix 5 sets out the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria.	Compliant	HR04-2025 HR05-2025 HR06-2025	Noise compliance reports contained in Annual reviews during the audit period indicate that compliance noise monitoring was undertaken in accordance with the <i>NSW Noise Policy for Industry</i> .																				
	However, the noise criteria in Table 2 do not apply if the Applicant has an agreement with the relevant landowner to exceed the noise criteria, and the Applicant has advised the Department in writing of the terms of this agreement.	Compliant	HR13-2025 Advice from Environmental Officer	The NMP indicates that noise agreements exist between Dixon Sand and the owners of residences R2 and R12. These agreements were formed in 2005 and 2019 respectively and DPE was made aware of the agreement during the Modification 1 and Modification 3 submission processes.																				
	"Note: Should an agreement with a landowner be terminated for any reason, the Applicant must comply with the noise criteria in Table 2. Receiver locations are shown in Appendix 5"	-	-	Noted.																				

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>NOISE (Cont'd)</b>				
	The Applicant must manage noise from construction activities (including acoustic bund construction) in accordance with the noise management levels defined in Table 2 of the Interim Construction Noise Guideline, except where the Applicant has an agreement with the relevant landowner to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of the agreement.	Not Triggered	HR04-2025 HR05-2025 HR06-2025 HR07-2025 HR16-2025	Acoustic bund construction and road and intersection works were not undertaken during the audit period. An Acoustic Bund Noise Management Plan is included in the EMS.
5	The Applicant must:			
5 (a)	design, construct and maintain the acoustic bunds shown in Appendix 3 to the satisfaction of the Secretary; and	Not Triggered	Observations HR16-2025	Construction of acoustic bunds has not yet commenced. Construction details and management measures are outlined in the Acoustic Bund Construction Noise Management Plan.
5 (b)	limit all bund construction activities to a period of not more than four weeks in any calendar year, unless otherwise approved by the Secretary.	Not Triggered	Advice from Environmental Officer	
6	Prior to the construction of any acoustic bunds, the Applicant must prepare an Acoustic Bund Construction Noise Management Plan, which details the procedures that would be undertaken to:	Not Triggered		
6 (a)	keep surrounding residents informed of the proposed timing and duration of bund construction;	Not Triggered		
6 (b)	minimise and mitigate the noise impacts generated by the works; and	Not Triggered		
6 (c)	receive, handle and respond to complaints relating to the works.	Not Triggered		
	The Applicant must implement the Acoustic Bund Construction Noise Management Plan as approved by the Secretary.	Not Triggered		
<b>Sandstone Cutting Shed Construction</b>				
6A	The Applicant must design and construct the sandstone cutting shed with adequate noise attenuation measures to ensure that it will achieve compliance with the noise criteria in this consent at all times.	Compliant	Advice from Operations Manager Observation HR04-2025 HR05-2025 HR06-2025	It is advised that the cutting shed was designed to have roller doors positioned to minimise external noise emissions and 'silent blades' are utilised. Excessive noise was not noticeable during the audit and noise monitoring has not indicated any issues with these activities.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>NOISE (Cont'd)</b>				
<b>Operating Conditions</b>				
7	The Applicant must:			
7 (a)	take all reasonable steps to minimise the construction, operational, low frequency and road transportation noise of the development;	Compliant	HR13-2025	Noise management measures are outlined in the NMP for the Quarry. No noise complaints were recorded for the audit period and noise monitoring did not indicate issues of concern.
7 (b)	take all reasonable steps to minimise the noise impacts of the development during noise-enhancing meteorological conditions;	Compliant	HR13-2025	Reactive management measures targeting noise in the event of adverse meteorological conditions are outlined in Section 5.2 of the NMP.
7 (c)	operate a noise management system to guide the day to day planning of quarrying operations and the implementation of noise mitigation measures to ensure compliance with the relevant conditions of this consent;	Compliant	HR13-2025	The NMP, including proactive and reactive noise management measures outlined in Section 5, is used to guide Quarry operations to ensure compliance with the relevant noise criteria.
7 (d)	carry out regular attended noise monitoring to determine whether the development is complying with the relevant conditions of this consent; and	Compliant	HR04-2025 HR05-2025 HR06-2025	Compliance noise monitoring is undertaken twice annually at the Quarry.
7 (e)	modify or stop operations on the site to comply with the relevant conditions of this consent.  <i>Note: Monitoring under this consent is not required at all residences and the use of representative monitoring locations can be used to demonstrate compliance with criteria, if agreed to by the Secretary.</i>	Compliant.	HR04-2025 HR05-2025 HR06-2025 HR13-2025	Noise monitoring did not indicate the need to modify or stop operations to ensure compliance.  Noise management measures, including modification to Quarry operations, are outlined in the NMP.
<b>Noise Management Plan</b>				
8	The Applicant must prepare a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	HR13-2025 HR27-2025 HR28-2025	The current NMP (January 2024) was submitted to DPHI and approved 18 January 2024.
8 (a)	be prepared in consultation with the EPA;	Compliant	HR13-2025	Consultation included in Appendix 2 of the NMP.
8 (b)	be submitted to the Secretary for approval within 6 months of the determination of Modification 1, unless otherwise agreed by the Secretary;	Compliant	HR34-2019	Mod 1 was approved on 22 January 2018. The NMP at that time was submitted to DPE on 18 July 2018.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>NOISE (Cont'd)</b>				
8 (c)	<p>describe the measures to be implemented to ensure:</p> <ul style="list-style-type: none"> <li>compliance with the noise criteria and operating conditions of this consent;</li> <li>best practice management is being employed; and</li> <li>the noise impacts of the development are minimised during noise-enhancing meteorological conditions.</li> </ul>	Compliant	HR13-2025	<p>Section 5 of the NMP describes the pro-active and reactive noise management measures necessary to ensure compliance with noise and operating conditions.</p> <p>Section 9 outlines responsibilities for implementing management and monitoring measures, including:</p> <ul style="list-style-type: none"> <li>reviewing meteorological forecasts on a daily basis;</li> <li>evaluating and reporting noise monitoring results; and</li> <li>undertaking regular reviews of the plan.</li> </ul>
8 (d)	describe the proposed noise management system;	Compliant	HR13-2025	The NMP represents the noise management system for the Quarry.
8 (e)	<p>include a noise monitoring program that:</p> <ul style="list-style-type: none"> <li>is capable of evaluating the performance of the development;</li> <li>includes a protocol for determining any exceedances of the relevant conditions of this consent; and</li> <li>effectively supports the noise management system.</li> </ul> <p>The Applicant must implement the Noise Management Plan as approved by the Secretary.</p>	Compliant	HR13-2025	Section 6 of the NMP presents a suitable noise monitoring program. Section 5.2 presents reactive management measures which include actions to be undertaken in the event that noise criteria exceedances are identified.
		Compliant	HR04-2025 HR05-2025 HR06-2025	Noise monitoring results reported in Annual Reviews during the audit period indicate that monitoring frequency matches that specified in the NMP. Results indicate that management measures are being implemented.
8 (f)	<p>Include a program to either:</p> <ul style="list-style-type: none"> <li>attenuate the dump trucks prior to commencing quarrying operations in Stages 4 or 5; or</li> <li>identify alternative mitigation measures and demonstrate that these measures will be implemented to achieve compliance with the noise criteria in this consent at all times; and</li> </ul>	Not Triggered	Observation <b>Figure 1</b> HR13-2025	<p>Quarrying operations had not yet commenced in the Stage 4 or Stage 5 areas at the time of the site inspection.</p> <p>Sections 2.6 and 5.1 of the NMP identify that noise attenuation measures, or alternative mitigation measures, must be developed and implemented prior to the commencement of quarrying operations in these areas.</p>
8 (g)	<p>Describe the noise mitigation measures that will be implemented in the operation of plant and equipment to minimise noise emissions from sandstone cutting to ensure compliance with the noise criteria in this consent at all times.</p> <p>The Applicant must implement the Noise Management Plan as approved by the Secretary.</p>	Compliant	HR13-2025	Noise management measures, including sandstone cutting operations, are outlined in the NMP.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions															
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>																			
<b>AIR QUALITY (Cont'd)</b>																			
<b>Air Quality Impact Assessment Criteria</b>																			
9	<p>The Applicant must ensure that particulate matter emissions generated by the development do not cause exceedances of the criteria in Table 3 at any residence on privately-owned land.</p> <p><i>Table 3: Air quality criteria</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging Period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>Annual</td> <td><sup>a,d</sup> 30 µg/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt; 10 µm (PM<sub>10</sub>)</td> <td>24 hour</td> <td><sup>b</sup> 50 µg/m<sup>3</sup></td> </tr> <tr> <td>Total suspended particulates (TSP)</td> <td>Annual</td> <td><sup>a,d</sup> 90 µg/m<sup>3</sup></td> </tr> <tr> <td><sup>c</sup> Deposited dust</td> <td>Annual</td> <td><sup>b</sup> 2 g/m<sup>2</sup>/month    <sup>a,d</sup> 4 g/m<sup>2</sup>/month</td> </tr> </tbody> </table> <p>Notes to Table 3:</p> <p>a Cumulative impact (ie increase in concentrations due to the development plus background concentrations due to all other sources).</p> <p>b Incremental impact (ie increase in concentrations due to the development alone, with zero allowable exceedances of the criteria over the life of the development).</p> <p>c Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.</p> <p>d Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.</p>	Pollutant	Averaging Period	Criterion	Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a,d</sup> 30 µg/m <sup>3</sup>	Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>b</sup> 50 µg/m <sup>3</sup>	Total suspended particulates (TSP)	Annual	<sup>a,d</sup> 90 µg/m <sup>3</sup>	<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month <sup>a,d</sup> 4 g/m <sup>2</sup> /month	Compliant	HR04-2025 HR05-2025 HR06-2025	Annual Reviews during the audit period record multiple exceedances of the relevant air quality criteria. However, the cause of these exceedances are attributed to either non-Quarry related activities or extraordinary weather events (e.g. bushfires). As such the development is considered to have not caused exceedances of the criteria. Refer to Section 3.1.3 of this audit report for further discussion.
Pollutant	Averaging Period	Criterion																	
Particulate matter < 10 µm (PM <sub>10</sub> )	Annual	<sup>a,d</sup> 30 µg/m <sup>3</sup>																	
Particulate matter < 10 µm (PM <sub>10</sub> )	24 hour	<sup>b</sup> 50 µg/m <sup>3</sup>																	
Total suspended particulates (TSP)	Annual	<sup>a,d</sup> 90 µg/m <sup>3</sup>																	
<sup>c</sup> Deposited dust	Annual	<sup>b</sup> 2 g/m <sup>2</sup> /month <sup>a,d</sup> 4 g/m <sup>2</sup> /month																	
10 10 (a)	The Applicant must: implement best practice management to minimise the dust emissions of the development;	Compliant	HR12-2025 Observations	The AQMP for the Quarry includes best practice management measures targeting the minimisation of dust emissions. Excessive dust generation was not observed during the audit inspection.															

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>AIR QUALITY (Cont'd)</b>				
10 (b)	"operate a continuous monitoring system to minimise air quality impacts at sensitive sites such as the Maroota Public School, including: <ul style="list-style-type: none"> <li>a monitoring device that is connected to an alarm system at the site;</li> <li>trigger level(s) as agreed with the EPA; and</li> <li>procedures to cease or modify operations in the event that the trigger level(s) are reached, to ensure compliance with the criteria in Condition 9 above, to the satisfaction of the EPA;"</li> </ul>	Compliant	HR12-2025 Advice from Operations Manager and Environmental Officer	A continuous air quality monitoring system, including a PM <sub>10</sub> monitoring station and a weather station, have been installed at the monitoring location near Maroota Public School. An alarm system indicates exceedances of the 42µg/m <sup>3</sup> trigger value by informing site personnel of exceedances via text. Procedures to adjust operations in the event that trigger levels are reached or exceeded are outlined in the AQMP.
10 (c)	regularly assess meteorological and air quality monitoring data on an ongoing basis and relocate, modify and/or stop operations on site to ensure compliance with the air quality criteria in this consent;	Compliant	HR04-2025 HR05-2025 HR06-2025 HR12-2025 Advice from Environmental Officer	Procedures to adjust operations in the event that trigger levels are reached or exceeded are outlined in the AQMP. A dust diary is planned to be implemented to record actions taken during these conditions (see <b>Improvement HR 11/25</b> ). Air quality monitoring data is reviewed regularly and reported in the Annual Reviews during the audit period.
10 (d)	minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see note under Table 3);	Compliant	HR12-2025 Advice from Environmental Officer	Requirements to minimise air quality impacts during adverse meteorological conditions and extraordinary events are discussed in the AQMP. Weather forecasts and potential implications for air quality impacts are reviewed daily by site personnel.
10 (e)	monitor and report on compliance with the relevant air quality conditions in this consent; and	Compliant	HR04-2025 HR05-2025 HR06-2025	Air quality monitoring and compliance with relevant criteria and trigger values was reported in the Annual reviews during the audit period.
10 (f)	"minimise the area of surface disturbance and undertake progressive rehabilitation of the site, to the satisfaction of the Secretary."	Compliant	Observations	Exposed operational areas and active extraction areas are consistent with the approved development. Whilst limited areas are available for final rehabilitation, both temporary and progressive rehabilitation was observed during the site inspection.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>AIR QUALITY (Cont'd)</b>				
<b>Air Quality Management Plan</b>				
11	The Applicant must prepare an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	HR12-2025 HR25-2025 HR26-2025	The current AQMP (version dated January 2024) has been prepared and was approved by DPHI on 18 January 2024 .
11 (a)	be prepared in consultation with the EPA;	Compliant	HR12-2025	Appendix 2 of the AQMP summarises the consultation outcomes with the EPA and provides a copy of the correspondence.
11(c)	describe the measures to be implemented to ensure: <ul style="list-style-type: none"> <li>compliance with the air quality criteria and operating conditions of this consent;</li> <li>best practice management is being employed; and</li> <li>the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;</li> </ul>	Compliant	HR12-2025	The AQMP includes best practice management measures, measures addressing impacts of weather conditions, and procedures to ensure the implementation of management measures.
11 (d)	describe the proposed air quality management system; and	Compliant	HR12-2025	The AQMP outlines the air quality management system employed at the Quarry.
11 (e)	include an air quality monitoring program that <ul style="list-style-type: none"> <li>is capable of evaluating the performance of the development and informing day to day operational decisions;</li> <li>includes a protocol for determining any exceedances of the relevant conditions of this consent; and</li> <li>effectively supports the air quality management system.</li> </ul>	Compliant	HR12-2025	The AQMP includes an air quality monitoring program which informs day to day operations at the Quarry, includes a protocol for determining exceedances of relevant criteria and trigger values and supports the air quality management system.
11 (f)	Include a program to implement the air quality emissions controls detailed in MR (Mod 3) including the sealing of internal haul roads. Relevant controls must be implemented before: <ul style="list-style-type: none"> <li>any increase in extractive operations above 250,000 tonnes of product per year; and</li> <li>the commencement of quarrying operations in Stages 4 or 5.</li> </ul>	Compliant	HR12-2025	An updated AQMP (version dated January 2024) has been prepared and was approved by DHI on 18 January 2024.  The requirement to seal internal haul roads prior to increasing extractive operations above 250 000tpa and the commencement of extraction in Stage 4 and 5 areas is outlined in Section 5.1 of the AQMP (January 2024).

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>AIR QUALITY (Cont'd)</b>				
11 (g)	Describe the mitigation measures that will be implemented in the sandstone cutting shed during the processing of extracted sandstone and detail how these measures will achieve compliance with the air quality criteria in this consent at all times; and	Compliant	HR12-2025	The approved AQMP (January 2024) includes measures targeting sandstone cutting operations.
11 (h)	Describe the mitigation measures that will be implemented in the operation of plant and equipment to minimise dust emissions from sandstone cutting to ensure compliance with the air quality criteria in this consent at all times.	Compliant	HR12-2025	The approved AQMP (January 2024) includes measures targeting sandstone cutting operations, principally utilisation of wet cutting techniques in the sandstone cutting shed.
	The Applicant must implement the Air Quality Management Plan as approved by the Secretary.	Compliant	HR12-2025	The high level review of the AQMP indicates that it has been satisfactorily implemented. This is supported by air quality monitoring results and lack of air quality complaints.
<b>Meteorological Monitoring</b>				
12	For the life of the development, the Applicant must ensure that there is a suitable meteorological station operating in the vicinity of Maroota Public School that	Compliant	HR04-2025 HR05-2025 HR06-2025 Observation	A weather station has been installed and was operational during the audit period at the relevant monitoring location adjacent to Maroota Public School. Weather station reports are appended to the respective Annual Reviews.
12(a)	complies with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales (DEC, 2007); and	Compliant	HR12-2025	The AQMP outlines meteorological monitoring requirements for the weather station operating within the vicinity of Maroota Public School
12(b)	is capable of measuring meteorological conditions in accordance with the NSW Noise Policy for Industry (EPA, 2017) unless a suitable alternative is approved by the Planning Secretary following consultation with the EPA	Compliant	HR13-2025	The NMP outlines meteorological monitoring requirements for the weather station operating within the vicinity of Maroota Public School
<b>Greenhouse Gas Emissions</b>				
13	The Applicant must implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.	Compliant	HR12-2025	Management measures targeting the minimisation of greenhouse gas emissions are included in Section 5 of the AQMP.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>SOIL AND WATER</b>				
	Note: Under the <i>Water Act 1912</i> and/or the <i>Water Management Act 2000</i> , the Applicant is required to obtain all necessary approvals and/or water licences for the development.	Compliant	HR04-2025 HR05-2025 HR06-2025 HR14-2025	Dixon Sand hold WAL25956 (Works Approval 10CA105044) and WAL25941 (Works Approval 10CA104191) for the Quarry, representing a total allocation of 182ML.
<b>Water Supply</b>				
14	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of operations under the consent to match its available water supply, to the satisfaction of the Secretary.	Compliant	HR04-2025 HR05-2025 HR06-2025 HR14-2025	Water usage reporting (Annual Reviews) indicates that water usage is significantly below the total water allocation.
<b>Water Discharges</b>				
15	The Applicant must comply with the discharge limits in any EPL, or with Section 120 of the POEO Act.	Not Triggered	HR04-2025 HR05-2025 HR06-2025 HR14-2025	No water discharges from the Quarry were recorded during the audit period.
<b>Groundwater Management</b>				
16	Prior to the commencement of quarrying operations within the Mod 1 extraction area, the Applicant must:	-	-	-
16 (a)	install additional monitoring bores in accordance with EA (Mod 1);	Compliant	HR25-2019	Previous correspondence between Dixon Sand and the Natural Resource Access Regulator indicate that additional bores were installed.
16 (b)	install one additional monitoring bore in the south-western corner of the Mod 1 extraction area;	Compliant	HR11-2025	Monitoring bore BH5 in south-western corner of MOD1 extraction area shown in Environmental Monitoring Locations plan.
16 (c)	install loggers in each on-site bore to enable continuous groundwater level monitoring;	Compliant	HR04-2025 HR05-2025 HR06-2025 HR14-2025	The SWMP indicates that bores are equipped with continuous data loggers. Logger results are presented in the respective Annual Reviews.
16 (d)	install water level loggers in all existing on-site quarry dams and in new quarry dams when constructed; and	<b>Non-compliant</b>	HR04-2025 HR05-2025 HR06-2025	Water level data loggers have been installed in groundwater bores but have not been installed in on-site dams. See <b>Recommendation HR R4/25</b> .

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>SOIL AND WATER (Cont'd)</b>				
16 (e)	carry out an aquifer pumping test within the SCBGS, to the satisfaction of DPE Water.	Compliant	HR25-2019 HR26-2019 HR14-2025	Records indicate that Dixon Sand submitted evidence of aquifer test pumping to Dol on 16 November 2018. Section 1.3.3 of the current SWMP (version dated January 2024) indicates that DPE Water and NRAR indicated satisfaction with the aquifer pumping tests on 26 November 2019.
17.	Prior to commencing quarrying operations within the MTSGS buffer zone, the Applicant must complete a baseline groundwater monitoring program, in consultation with DPE Water and to the satisfaction of the Secretary. The program must include monthly monitoring of groundwater levels and quality within the MTSGS buffer zone for a period of not less than 2 years.	Compliant	HR14-2025 HR04-2025 HR05-2025 HR06-2025	Extraction has commenced within the MTSGS buffer zone (MOD 1 extraction area Cell 1B). The baseline groundwater monitoring program commenced on 30 July 2018. The groundwater monitoring assessment prepared following this program was submitted to DPE Water on 4 September 2020. The program was approved by NRAR in correspondence dated 25 February 2021 and 24 May 2021 and DPE acknowledged satisfaction with the outcome on 11 June 2021. Recommendations to replace several boreholes with a single borehole was received from DCCEEW – Water. A proposal to install a new borehole as designed by WSP Golder was accepted by DCCEEW – Water on 24 May 2023. BH07, the replacement bore, was commissioned in August 2023.
	The Applicant must not commence quarrying operations within the MTSGS buffer zone without the prior approval of the Secretary.	Compliant	HR14-2025	The groundwater monitoring program was approved by NRAR in correspondence dated 25 February 2021 and 24 May 2021 and DPE acknowledged that the pre-extraction requirements had been met on 11 June 2021. Recommendations to replace several boreholes with a single borehole was received from DCCEEW – Water. A proposal to install a new borehole as designed by WSP Golder was accepted by DCCEEW – Water on 24 May 2023. BH07, the replacement bore, was commissioned in August 2023.

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>SOIL AND WATER (Cont'd)</b>				
18.	The Applicant must ensure that groundwater in the regional groundwater sources managed under the Water Sharing Plan for the Greater Metropolitan Groundwater Sources 2011 is not intercepted or contaminated by its operations. In the event of this groundwater being intercepted or contaminated, operations are to cease within the vicinity of the affected area and the Applicant must consult with the Secretary and DPE Water to determine the basis upon which extraction may recommence.	Compliant	HR14-2025	Section 5.2 of the SWMP outlines a groundwater monitoring program which covers groundwater quality and inflow volumes. Tables 6.5 outlines appropriate procedures in the event that groundwater is intercepted or contaminated.
	Note: Perched groundwater lenses that are above the regional groundwater source may be intercepted, however Water Access Licences must be held to account for all groundwater taken.	Compliant	HR04-2025 HR05-2025 HR06-2025 HR14-2025	Section 5.2.2 of the SWMP identifies measures to be implemented to estimate the volume of any groundwater inflows resulting from the interception of perched groundwater lenses. Table 6.5 indicates that additional licencing would be sought in the event that inflows in excess of licence limits are identified. The water usage reported in the respective Annual Reviews for the audit period confirm that water take remained below the WAL allocations held.
<b>Soil and Water Management</b>				
19.	The Applicant must prepare a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	HR14-2025 HR29-2025	The current SWMP (January 2024) was approved by (then) DPHI 18 January 2024.
19. (a)	be prepared by a suitably qualified and experienced person/s approved by the Secretary;	Compliant	HR101-2022	The (then) DPE endorsed Hunsamon Churcher and Christopher Churcher 14 November 2022 to prepare the current version of the SWMP.
19. (b)	be prepared in consultation with the EPA and DPE Water;	Compliant	HR14-2025	Consultation with EPA and (then) DPE Water included as Appendix 2 of the SWMP.
19. (c)	be submitted to the Secretary for approval prior to the commencement of quarrying operations within the Mod 1 extraction area, unless otherwise agreed by the Secretary; and	Compliant	HR29-2025 HR14-2025	The SWMP was previously submitted prior to commencement of operations within the MOD1 extraction area. The groundwater monitoring program was approved by NRAR in correspondence dated 25 February 2021 and 24 May 2021 and DPE acknowledged that the pre-extraction requirements had been met on 11 June 2021.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>SOIL AND WATER (Cont'd)</b>				
19. (d) 19. (d) (i)	Include a: Site Water Balance that includes: <ul style="list-style-type: none"> <li>• details of:               <ul style="list-style-type: none"> <li>– sources and security of water supply;</li> <li>– water use and management on site;</li> <li>– any off-site water transfers; and</li> <li>– reporting procedures; and</li> </ul> </li> <li>• measures to be implemented to minimise clean water use on site;</li> </ul>	Compliant	HR14-2025	A detailed water balance including the required components and reporting procedures is presented in Section 4 of the SWMP. Measures to minimise clean water use are outlined in Section 3.1.
19. (d) (ii)	Surface Water Management Plan, that includes: <ul style="list-style-type: none"> <li>• a program for obtaining detailed baseline data on surface water flows and quality in water bodies that could potentially be affected by the development;</li> <li>• a detailed description of the surface water management system on site including the:               <ul style="list-style-type: none"> <li>– clean water diversion system;</li> <li>– erosion and sediment controls;</li> <li>– dirty water management system; and</li> <li>– water storages, including the area, depth and capacity of any in-pit sumps; and</li> </ul> </li> <li>• a program to monitor and report on:               <ul style="list-style-type: none"> <li>– any surface water discharges;</li> <li>– the effectiveness of the water management system;</li> <li>– the quality of water discharged from the site to the environment; and</li> <li>– surface water flows and quality in local watercourses; and</li> </ul> </li> </ul>	Compliant	HR14-2025	Section 2.1.4 of the SWMP outlines a program to obtain baseline data for potential receiving water bodies. Section 3 of the SWMP details the surface water management system for the Quarry, including all necessary components. No licenced discharge point exists for the Quarry, however Section 3.1.2 outlines an approach to monitor future operations and the necessity for a licenced discharge point. Section 5.1 of the SWMP outlines monitoring and reporting procedures covering the effectiveness of the water management system and the quality of receiving waters.



Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>TRANSPORT</b>				
<b>Roadworks</b>				
20.	Prior to carrying out any development, the Applicant must upgrade Haerses Road to meet the requirements for 'internal haul roads', under Baulkham Hills Development Control Plan No. 16 – <i>Extractive Industries, to the satisfaction of Council.</i>	Compliant	2019 IEA	Haerses Road upgrade works were completed prior to the 2019 IEA audit period in accordance with the original consent for the Quarry.
21.	The Applicant must:			
21. (a)	maintain safe access to the site for the public and emergency services for the duration of the development; and	Compliant	Observation	The Quarry access road is well maintained.
21. (b)	reinstate the extracted length of Haerses Road to the satisfaction of Council. Notes: <ul style="list-style-type: none"> <li>The Applicant must ensure that the final alignment and design of Haerses Road is approved by Council prior to the commencement of the development.</li> <li>The Applicant must bear the full costs associated with the design, survey and construction of the road works, including the relocation of utilities, if required.</li> <li>All works are to be in accordance with Council's Design Guidelines and Work Specifications for Subdivisions and Developments.</li> <li>Following the reconstruction of Haerses Road, the Applicant must rehabilitate any temporary access roads that were established on site.</li> </ul>	Not Triggered	-	Haerses Road will be reinstated following the completion of extraction activities in the relevant areas, in accordance with the Hills Shire Council Proposed Future Road Design Haerses Road, Maroota plan.
22.	Prior to carrying out any development, the Applicant must:			
22. (a)	provide for appropriate sight distances at the intersection of Haerses Road and Wisemans Ferry Road, by clearing and/or lopping vegetation along the eastern approach of Wisemans Ferry Road; and	Compliant	2019 IEA Observation	The works nominated in this condition were completed prior to the audit period in accordance with the 2006 development consent. Truck turning signs remain in place (with 100m sign).

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>TRANSPORT (Cont'd)</b>				
22. (b)	provide warning signage (“Truck Turning”) on the eastern and western approaches of Wisemans Ferry Road, to the satisfaction of TfNSW.	Compliant		
23.	<p>Within 12 months of the commencement of the development, the Applicant must construct a Type ‘AUR’ treatment at the intersection of Haerses Road and Wisemans Ferry Road to the satisfaction of RMS. Until the intersection works have been completed to the satisfaction of RMS, the Applicant must limit the number of trucks entering the site to 15 truck movements per day.</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>• Prior to the Construction Certificate being released the Applicant must: <ul style="list-style-type: none"> <li>– enter into a Memorandum of Understanding with the TfNSW that the Type ‘AUR’ intersection treatment shall be fully constructed and handed over to the TfNSW within 12 months of the commencement of the development; and</li> <li>– issue a bank guarantee in favour of the TfNSW for the total cost of the intersection works (the cost to be determined following the approval of detailed design plans by the TfNSW).</li> </ul> </li> <li>• The Applicant shall ensure that the intersection works comply with the TfNSW Road Design Guide.</li> <li>• The Applicant shall bear the full costs associated with the design, survey and construction of the works, including the relocation of utilities, if required.</li> </ul>	Compliant		
24.	Prior to transporting any quarry products derived from quarrying operations within the Mod 1 extraction area, the Applicant must construct a channelised right-turn ‘CHR’ treatment at the intersection of Haerses Road and Wisemans Ferry Road to the satisfaction of TfNSW. The Applicant must:	Compliant	HR102-2022 HR103-2022	Upgrade design plans were provided and intersection upgrade works have been completed. Extraction in the MOD 1 Extraction area has commenced.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>TRANSPORT (Cont'd)</b>				
24. (a)	submit detailed design plans to TfNSW for approval prior to the issue of a construction certificate by Council or the commencement of road works; and	Compliant	HR102-2022 HR103-2022	Upgrade design plans were provided and intersection upgrade works have been completed.  Extraction in the MOD 1 Extraction area has commenced.
24. (b)	design and construct the intersection treatment in accordance with the Austroads Guide to Road Design.			
24A.	The Applicant must monitor trucks queuing within the right turn bay at the quarry intersection on Wisemans Ferry Road and, in the instance that there are trucks regularly queuing at the intersection, extend the length of the right turn bay to the satisfaction of TfNSW.	Compliant	HR15-2025	A procedure for monitoring trucks queuing in the right turn bay is outlined in Section 5.3 of the TMP (dated January 2024).
<b>Construction Traffic Management</b>				
25.	Prior to commencement of the works referred to in Condition 24 above, the Applicant must prepare and implement a Traffic Control Plan for the development to the satisfaction of the TfNSW.	Compliant	HR103-2022	Traffic management plan (dated 26 June 2020) prepared by Simmons Civil Contracting Pty Ltd for the intersection upgrade works required under Condition 24. Intersection upgrade works were completed prior to the last independent environmental audit in 2022.
<b>Monitoring of Product Transport</b>				
26.	The Applicant must keep accurate records of all laden truck movements to and from the site (including time of arrival and dispatch) and publish a summary of these records on its website every 6 months.	<b>Non-compliant</b>	Advice from Environmental Officer.	Two systems are utilised to record truck movements. To ensure compliance with the truck limits prior to 7:00am records are taken by the weighbridge operator and recorded in a separate Excel spread sheet. Daily truck limits are also recorded and managed using weighbridge software, ClearWeigh. Whilst the software records times of laden truck movements over the weighbridge, it does not record unladen movements (which do not pass over the weighbridge). See <b>Recommendation HR R5/25</b> .  The 6-monthly summary of laden truck movement records are published on the Dixon Sand website.

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>TRANSPORT (Cont'd)</b>				
<b>Operating Conditions</b>				
27. 27.(a)	The Applicant must: ensure that all laden trucks have their loads covered when arriving at or leaving the site;	Compliant	HR15-2025 Observation	The requirement for vehicles entering or leaving the site to have loads covered is outlined in Section 5 of the TMP. All laden trucks were observed leaving the site during the site inspection were covered. Areas where trucks can pull over to check load covers and remove any loose material are also available prior to trucks exiting the site.
27.(b)	ensure that all laden trucks are cleaned of material that may fall from vehicles, before leaving the site; and	Compliant	HR15-2025 Observation	The requirement for vehicles to be cleaned of materials that may fall from vehicles is included in Section 5 of the TMP. All laden trucks observed leaving the site during the site inspection were sufficiently clean with no obvious materials able to fall from the trailers.
27. (c)	use its best endeavours to ensure that appropriate signage is displayed on all trucks used to transport product from the development so they can be easily identified by road users.	Compliant	HR15-2025	The requirement for vehicles to be maintained in a clean state to allow visibility of signage is included in Section 5 of the TMP.
<b>Traffic Management Plan</b>				
28	The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	HR15-2025 HR30-2025	The current approved TMP is dated January 2025 and was approved by DPHI 18 January 2024.
28 (a)	be prepared in consultation with the TfNSW and Council;	Compliant	HR15-2025	Consultation with RMS and the Hills Shire Council is presented as Appendix 2 of the TMP.
28 (b)	be submitted to the Secretary for approval within 6 months of the determination of Modification 1, unless otherwise agreed by the Secretary;	Compliant	HR35-2019	Modification 1 was approved on 22 January 2018. An earlier version of the TMP was submitted to DPE on 2 July 2018.
28 (c)	describe the processes in place to control the arrival and dispatch of trucks;	Compliant	HR15-2025	Section 6.1 of the TMP identifies the processes in place to control the arrival and despatch of trucks.
28 (d)	include a Drivers' Code of Conduct that details the safe and quiet driving practices that must be used by drivers travelling to and from the site, particularly in the vicinity of Maroota Public School;	Compliant	HR79-2022	Section 4 of the TMP forms the Drivers Code of Conduct.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>TRANSPORT (Cont'd)</b>				
28 (e)	describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct;	Compliant	HR15-2025	Section 4.2 of the TMP outlines measures to ensure compliance with the Drivers Code of Conduct.
28 (f)	include specific measures to minimise the impact of heavy vehicles, including restrictions on routes and times (particularly in relation to peak hours, holiday periods and times immediately before and after school hours, i.e. 8.30am – 9.00am and 3.00pm - 3.30pm);	Compliant	HR15-2025	Measures to minimise heavy vehicle impacts are outlined in the Site Traffic Management Plan which forms Appendix 3 of the TMP.
28 (g)	propose measures to minimise the transmission of dust and tracking of material onto the surface of the public road from vehicles leaving the quarry; and	Compliant	HR15-2025	Section 5.3 of the TMP outlines measures to minimise the transmission and tracking of dust and material onto public roads.
28 (h)	include a protocol to monitor truck queuing behaviour in the right turn bay at the quarry intersection on Wisemans Ferry Road, and trigger points for implementing the intersection upgrade required under Condition 24A.	Compliant	HR15-2025	A procedure for monitoring trucks queuing in the right turn bay is outlined in Section 5.3 of the TMP (dated January 2024). Details of monitoring is recorded as part of the Monthly Inspection Checklist (which are also attached to the respective Annual Review).  A trigger for implementing mitigation measures (including potential upgrades) is included in Section 5.4.
	The Applicant must implement the approved Traffic Management Plan as approved by the Secretary.	Compliant	HR15-2025 HR30-2025	The site currently operates under the approved TMP dated January 2025.
<b>ABORIGINAL HERITAGE</b>				
29	If any suspected object or place of Aboriginal heritage significance is identified on site, the Applicant must ensure that:	Not Triggered	Advice from Environmental Officer HR07-2025	No suspected objects or places of Aboriginal heritage significance were identified at the Quarry Site during the audit period.  One Aboriginal site has been identified within the Haerses Road Biodiversity Offset Area.  A procedure for unanticipated Aboriginal finds is included in Section 9 of the EMS for the Quarry.
29 (a)	all work in the immediate vicinity of the suspected Aboriginal object or place ceases immediately			
29 (b)	a 10m buffer area around the suspected Aboriginal object or place is cordoned off; and			
29 (c)	the Heritage NSW is contacted immediately.			
	Work in the immediate vicinity of the suspected Aboriginal object or place may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.			

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																								
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>																												
<b>BIODIVERSITY AND REHABILITATION</b>																												
<b>Biodiversity Offset Strategy</b>																												
30	<p>The Applicant must retire the biodiversity credits specified in Table 4 to the satisfaction of the Secretary and BCD. The Applicant must retire the credits prior to commencing any vegetation clearing within the Mod 1 extraction area, except the minimum clearing required to comply with Condition 16 of this Schedule.</p> <p><i>Table 4: Biodiversity credits to be retired prior to the commencement of vegetation clearing</i></p> <table border="1"> <thead> <tr> <th>Credit type</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td colspan="2"><b>Ecosystem Credits</b></td> </tr> <tr> <td>HN560 Needlebush – Banksia Wet Heath on Sandstone Plateaux of the Sydney Basin Bioregion</td> <td>3</td> </tr> <tr> <td>HN566 Red Bloodwood – Scribbly Gum Heathy Woodland on Sandstone Plateaux of the Sydney Basin Bioregion</td> <td>377</td> </tr> <tr> <td>HN582 Scribbly Gum – Hairpin Banksia – Dwarf Apple Heathy Woodland on Hinterland Sandstone Plateaux of the Central Coast, Sydney Basin Bioregion</td> <td>181</td> </tr> <tr> <td>HN586 Smooth-barked Apple – Red Bloodwood – Sydney Peppermint Heathy Open Forest on Slopes of Dry Sandstone Gullies of Western and Southern Sydney, Sydney Basin Bioregion</td> <td>44</td> </tr> <tr> <td colspan="2"><b>Species Credits</b></td> </tr> <tr> <td><i>Darwinia biflora</i></td> <td>360</td> </tr> <tr> <td>Dural Land Snail (<i>Pommerhelix duralensis</i>)</td> <td>98</td> </tr> <tr> <td>Eastern Pygmy Possum (<i>Cercartetus nanus</i>)</td> <td>148</td> </tr> <tr> <td><i>Grevillea parviflora</i> subsp. <i>supplicans</i></td> <td>338</td> </tr> <tr> <td><i>Tetradlea glandulosa</i></td> <td>288</td> </tr> </tbody> </table>	Credit type	Number of Credits	<b>Ecosystem Credits</b>		HN560 Needlebush – Banksia Wet Heath on Sandstone Plateaux of the Sydney Basin Bioregion	3	HN566 Red Bloodwood – Scribbly Gum Heathy Woodland on Sandstone Plateaux of the Sydney Basin Bioregion	377	HN582 Scribbly Gum – Hairpin Banksia – Dwarf Apple Heathy Woodland on Hinterland Sandstone Plateaux of the Central Coast, Sydney Basin Bioregion	181	HN586 Smooth-barked Apple – Red Bloodwood – Sydney Peppermint Heathy Open Forest on Slopes of Dry Sandstone Gullies of Western and Southern Sydney, Sydney Basin Bioregion	44	<b>Species Credits</b>		<i>Darwinia biflora</i>	360	Dural Land Snail ( <i>Pommerhelix duralensis</i> )	98	Eastern Pygmy Possum ( <i>Cercartetus nanus</i> )	148	<i>Grevillea parviflora</i> subsp. <i>supplicans</i>	338	<i>Tetradlea glandulosa</i>	288	Compliant	HR105-2022	<p>Correspondence from DPIE dated 1 November 2019 confirms that the offsetting requirements under Condition 30 have been met for extraction in the first stage of the MOD 1 Extraction Area.</p> <p>Offsetting requirements were met through payment into the Biodiversity Conservation Fund (confirmation dated 1 November 2019).</p>
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Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions												
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>																
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>																
31	<p>The Applicant must retire the biodiversity credits specified in Table 5 to the satisfaction of the Secretary and BCD. The Applicant must retire the credits prior to commencing any vegetation clearing in extraction cells 2A, 2B or 3B (as shown in Figure 2, Appendix 1), except the minimum clearing required to comply with Condition 16 of this Schedule.</p> <p><i>Table 5: Biodiversity credits to be retired prior to vegetation clearing in extraction cells 1B, 2B or 3B</i></p> <table border="1"> <thead> <tr> <th>Credit type</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td colspan="2"><i>Species Credits</i></td> </tr> <tr> <td>Dural Land Snail (<i>Pommerhelix duralensis</i>)</td> <td>132</td> </tr> </tbody> </table> <p>Prior to commencing vegetation clearing in any of extraction cells 2A, 2B and 3B, the Applicant must demonstrate that the proportionate credits required in respect of that cell have been retired, to the satisfaction of the Secretary.</p> <p><i>Table 5: Biodiversity credits to be retired prior to vegetation clearing in extraction cells 2A, 2B or 3B</i></p> <table border="1"> <thead> <tr> <th>Credit type</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td colspan="2"><i>Species Credits</i></td> </tr> <tr> <td>Dural Land Snail (<i>Pommerhelix duralensis</i>)</td> <td>132</td> </tr> </tbody> </table>	Credit type	Number of Credits	<i>Species Credits</i>		Dural Land Snail ( <i>Pommerhelix duralensis</i> )	132	Credit type	Number of Credits	<i>Species Credits</i>		Dural Land Snail ( <i>Pommerhelix duralensis</i> )	132	Compliant	HR31-2025 HR32-2025 HR56-2025	A range of correspondence with DPFI occurred during the audit period with correspondence from DPFI dated 10 April 2024 confirming that the biodiversity credit obligations as required by <i>Schedule 3 Conditions 31, 32 and 33</i> have been met.
Credit type	Number of Credits															
<i>Species Credits</i>																
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Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions										
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>														
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>														
32	<p>The Applicant must retire the biodiversity credits specified in Table 6 to the satisfaction of the Secretary and BCD. The Applicant must retire the credits prior to commencing any vegetation clearing in extraction cells 2A, 2B, 3A, 3B, 4A, 4B and 5B (as shown in Figure 2, Appendix 1), except the minimum clearing required to comply with Condition 16 of this Schedule.</p> <p>Prior to commencing vegetation clearing in any of extraction cells 2A, 2B, 3A, 3B, 4A, 4B and 5B, the Applicant must demonstrate that the proportionate credits required in respect of that cell have been retired, to the satisfaction of the Secretary.</p> <p><i>Table 6: Biodiversity credits to be retired progressively</i></p> <table border="1"> <thead> <tr> <th>Credit type</th> <th>Number of Credits</th> </tr> </thead> <tbody> <tr> <td colspan="2"><b>Ecosystem Credits</b></td> </tr> <tr> <td>HN582 Scribbly Gum – Hairpin Banksia – Dwarf Apple Heathy Woodland on Hinterland Sandstone Plateaux of the Central Coast, Sydney Basin Bioregion</td> <td>357</td> </tr> <tr> <td colspan="2"><b>Species Credits</b></td> </tr> <tr> <td>Eastern Pygmy Possum (<i>Cercartetus nanus</i>)</td> <td>75</td> </tr> </tbody> </table>	Credit type	Number of Credits	<b>Ecosystem Credits</b>		HN582 Scribbly Gum – Hairpin Banksia – Dwarf Apple Heathy Woodland on Hinterland Sandstone Plateaux of the Central Coast, Sydney Basin Bioregion	357	<b>Species Credits</b>		Eastern Pygmy Possum ( <i>Cercartetus nanus</i> )	75	Compliant	HR31-2025 HR32-2025 HR56-2025	A range of correspondence with DPPI occurred during the audit period with correspondence from DPPI dated 10 April 2024 confirming that the biodiversity credit obligations as required by <i>Schedule 3 Conditions 31, 32 and 33</i> have been met.
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33	<p>In retiring the ecosystem and species credits set out in Conditions 30 to 32 above, the Applicant may apply the Biodiversity Offset Strategy (see Appendix 4) or, with the agreement of the Secretary, may use other land, the NSW Biodiversity Conservation Fund or alternate mechanisms permitted under the Biodiversity Offsets Scheme of the BC Act.</p> <p>The credits identified in Tables 4, 5 and 6 were calculated in accordance with Framework for Biodiversity Assessment of the NSW Biodiversity Offset Policy for Major Projects (OEH, 2014) and may need to be converted to reasonably equivalent 'biodiversity credits', within the meaning of the BC Act, if the credits are to be retired in accordance with the Biodiversity Offsets Scheme of the BC Act.</p>	-	-	Noted.										

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions										
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>														
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>														
<b>Rehabilitation Objectives</b>														
34	<p>The Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the final landform shown in Appendix 6 and must comply with the objectives in Table 6.</p> <p><i>Table 6: Rehabilitation Objectives</i></p> <table border="1"> <thead> <tr> <th>Feature</th> <th>Objective</th> </tr> </thead> <tbody> <tr> <td>All areas of the site affected by the development</td> <td> <ul style="list-style-type: none"> <li>Safe</li> <li>Hydraulically and geotechnically stable</li> <li>Non-polluting</li> <li>Fit for the intended final land use(s)</li> <li>Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land</li> </ul> </td> </tr> <tr> <td>Surface infrastructure</td> <td> <ul style="list-style-type: none"> <li>Decommissioned and removed, unless otherwise agreed by the Secretary</li> </ul> </td> </tr> <tr> <td>Quarry benches and pit floor</td> <td> <ul style="list-style-type: none"> <li>Landscaped and vegetated using native tree and understorey species</li> </ul> </td> </tr> <tr> <td>Final void</td> <td> <ul style="list-style-type: none"> <li>Minimise the size, depth and slope of the batters of the final void</li> <li>Minimise the drainage catchment of the final void</li> </ul> </td> </tr> </tbody> </table>	Feature	Objective	All areas of the site affected by the development	<ul style="list-style-type: none"> <li>Safe</li> <li>Hydraulically and geotechnically stable</li> <li>Non-polluting</li> <li>Fit for the intended final land use(s)</li> <li>Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land</li> </ul>	Surface infrastructure	<ul style="list-style-type: none"> <li>Decommissioned and removed, unless otherwise agreed by the Secretary</li> </ul>	Quarry benches and pit floor	<ul style="list-style-type: none"> <li>Landscaped and vegetated using native tree and understorey species</li> </ul>	Final void	<ul style="list-style-type: none"> <li>Minimise the size, depth and slope of the batters of the final void</li> <li>Minimise the drainage catchment of the final void</li> </ul>	Not Triggered	Observations HR80-2022 Advice from Operations Manager	<p>Quarry operations have generally not progressed to the stage at which rehabilitation to the final landform can be undertaken.</p> <p>Limited rehabilitation in the form of backfilling has been undertaken within the Stage 1 extraction area, however, further earthworks are required to shape material in accordance the final landform.</p>
Feature	Objective													
All areas of the site affected by the development	<ul style="list-style-type: none"> <li>Safe</li> <li>Hydraulically and geotechnically stable</li> <li>Non-polluting</li> <li>Fit for the intended final land use(s)</li> <li>Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land</li> </ul>													
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<b>Progressive Rehabilitation</b>														
35	The Applicant must rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable 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.	Compliant	Observation Advice from Operations Manager	<p>Limited rehabilitation, in the form of backfilling, has been undertaken within the Stage 1 extraction area, however, further backfilling is required followed by shaping of material to form the final landform.</p> <p>Quarry development remains at an early stage with extraction operations continuing in Stage 1 and 2 and Cells 1A to 3B and therefore opportunities to undertake progressive rehabilitation have been limited.</p>										
<b>Biodiversity and Rehabilitation Management Plan</b>														
36	The Applicant must prepare a Biodiversity and Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	HR80-2022 HR106-2022 HR33-2025	<p>The current approved BRMP is dated November 2020.</p> <p>It is noted that an updated BRMP (version dated 30 November 2022) was submitted to (then) DPE. Further updates were requested 22 December 2022, however, an updated plan has not yet been submitted. <b>Recommendation HR R6/25.</b></p>										

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
36 (a)	be prepared by a suitably qualified expert;	Compliant	HR80-2022 HR106-2022	The BRMP was prepared by prepared by Alison Riley, Umwelt NSW Ecology Manager. An updated BRMP (unapproved – dated November 2022) was prepared by Hunsamon Churcher of Project Environmental Services Pty Ltd.
36 (b)	be prepared in consultation with BCD and Council;	Compliant	HR80-2022 HR106-2022	Consultation with the Hills Shire Council and OEH presented as Appendix 2 of the BRMP.
36 (d)	provide details of the conceptual final landform and associated final land use(s) for the site;	Compliant	HR80-2022 HR106-2022	Sections 6.3 and 6.4 of the BRMP present the conceptual final landform and land use for the Quarry.
36 (e)	describe how the implementation of the Biodiversity Offset Strategy will be integrated with the overall rehabilitation of the site;	Compliant	HR80-2022 HR106-2022	Section 3.2 of the BRMP outlines how the biodiversity offset strategy area will be integrated with rehabilitation of the Quarry site.
36 (f)	describe the short, medium and long term measures to be implemented to: <ul style="list-style-type: none"> <li>manage remnant vegetation and habitat on site, including within the Biodiversity Offset Strategy area; and</li> <li>ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent;</li> </ul>	Compliant	HR80-2022 HR106-2022 HR33-2025 HR34-2025	Section 5 and Table 5.1 of the BRMP outline the short-, medium- and long-term management measures to achieve the rehabilitation objectives. Management and monitoring measures for the biodiversity offset area (Haerses Road and Porters Road Biobank Sites) are outlined in the approved Biobanking Agreements (Appendix 5 of the BRMP) and Biobank Site Management Plans.
36 (g)	include a detailed description of the measures described in paragraph (f) to be implemented over the next 3 years (to be updated for each 3 year period following initial approval of the plan) including the procedures to be implemented for: <ul style="list-style-type: none"> <li>maximising the salvage of environmental resources within the approved disturbance area, including tree hollows, vegetative and soil resources, for beneficial reuse in the enhancement of the offset area or site rehabilitation;</li> <li>restoring and enhancing the quality of native vegetation and fauna habitat in the biodiversity offset and rehabilitation areas through assisted natural regeneration, targeted vegetation establishment and the introduction of fauna habitat features;</li> </ul>	<b>Non-Compliant</b>	HR80-2022 HR106-2022 Advice from Environmental Officer	The updated BRMP (unapproved) outlines a rehabilitation strategy for 2021-2023. An updated BRMP outlining a rehabilitation strategy for subsequent periods has not been prepared. <b>Recommendation HR R6/25.</b> Sections 5.1.1, 5.1.3 and 5.1.4 outline measures targeting the salvage of environmental resources. Section 5.3 of the BRMP outlines on-site revegetation activities in rehabilitation areas. Revegetation activities in the biodiversity offset area are not described, rather Section 5.4 confirms that management and monitoring actions for the offset sites will be undertaken in accordance with the approved Biobanking Agreements.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
	<ul style="list-style-type: none"> <li>protecting vegetation and fauna habitat outside the approved disturbance area on-site, paying particular attention to any occurrences of <i>Hibbertia superans</i> adjacent to the approved extraction areas;</li> </ul>			Section 5.1.1.1 describes measures to define limits of vegetation clearing with specific reference to <i>Hibbertia superans</i> .
	<ul style="list-style-type: none"> <li>minimising the impacts on native fauna, including undertaking pre-clearance surveys and avoiding clearing activities during sensitive hibernation and breeding periods;</li> </ul>			Sections 5.1.1.2 and 5.1.1.3 of the BRMP outline pre-clearing survey and timing requirements.
	<ul style="list-style-type: none"> <li>establishing vegetation screening to minimise the visual impacts of the site on surrounding receivers;</li> </ul>			Sections 5.3.2 and 5.3.3 of the BRMP outline vegetation screening measures.
	<ul style="list-style-type: none"> <li>ensuring minimal environmental consequences for threatened species, populations and habitats;</li> </ul>			Sections 5.1, 5.2 and 5.3 of the BRMP outline biodiversity management controls, operational controls and revegetation strategies aimed at minimising environmental consequences.
	<ul style="list-style-type: none"> <li>collecting and propagating seed;</li> </ul>			Section 5.1.2 of the BRMP outlines a seed collection procedure and indicates that a propagation procedures will be implemented. A propagation procedure is not described. The Company relies upon the seed collection and propagation procedures of suitable contractors commissioned to undertake this work.
	<ul style="list-style-type: none"> <li>controlling weeds and feral pests;</li> </ul>			Sections 5.2.2 and 5.2.3 of the BRMP outline weed and pest management strategies.
	<ul style="list-style-type: none"> <li>controlling erosion; and</li> </ul>			Section 5.2.4 of the BRMP details erosion and sediment control measures.
	<ul style="list-style-type: none"> <li>managing bushfire risk;</li> </ul>			Section 5.2.5 of the BRMP details fire management measures.
36 (h)	include a program to monitor the effects of the development on flora and fauna;	Compliant	HR80-2022 HR106-2022	Section 7.3 of the BRMP describes rehabilitation inspections and ecological rehabilitation monitoring parameters and frequencies.
36 (i)	include detailed performance and completion criteria for evaluating the performance of the Biodiversity Offset Strategy and the rehabilitation of the site (including progressive rehabilitation), including triggers for any necessary remedial action;	Compliant	HR80-2022 HR106-2022	Section 6.5 of the BRMP provides performance and completion criteria for the Quarry within a single column, in addition to triggers and potential corrective actions.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
36 (j)	include a program to monitor and report on the effectiveness of the measures described in paragraphs (f) and (g), and progress against the performance and completion criteria;	Compliant	HR80-2022 HR106-2022	Section 7 of the BRMP includes a program to monitor and report on progress against performance and completion criteria.
36 (k)	identify the potential risks to the successful implementation of the plan, and include a description of the contingency measures to be implemented to mitigate against or address these risks, including specific measures to be implemented in the event that the performance and completion criteria are not satisfied; and	Compliant	HR80-2022 HR106-2022	Section 10 of the BRMP identifies threats and corrective actions in the event that criteria are not achieved.
36 (l)	include details of who is responsible for monitoring, reviewing, and implementing the plan.  The Applicant must implement the Biodiversity and Rehabilitation Management Plan as approved by the Secretary.	Compliant  Compliant	HR80-2022 HR106-2022	Section 11 of the BRMP describes accountabilities for monitoring, reviewing and implementing the plan.  The site currently operates under the BRMP dated November 2020.
<b>Biodiversity and Rehabilitation Bond</b>				
37	Within 6 months of the approval of the Biodiversity and Rehabilitation Management Plan, the Applicant must lodge a Biodiversity and Rehabilitation Bond with the Department to ensure that the Biodiversity Offset Strategy and rehabilitation of the site are implemented in accordance with the performance and completion criteria set out in the Biodiversity and Rehabilitation Management Plan and the relevant conditions of this consent. The sum of the bond must be determined by:	Not Triggered	--	This requirement does not relate to the current audit period.  The original BRMP was approved on 18 September 2018 and the Biodiversity and Rehabilitation Bond was lodged on 25 March 2019 (i.e. 1 week past the required timeframe).  The Biodiversity and rehabilitation Bond was lodged on 25 March 2019. Approval of the bond amount was granted by DPE on 13 March 2019. The calculated costs were reviewed by Narla Environmental Pty Ltd.
37 (a)	calculating the full cost of implementing the Biodiversity Offset Strategy;			
37 (b)	calculating the cost of rehabilitating all disturbed areas of the site, taking into account the likely surface disturbance over the next 3 years of quarrying operations; and			
37 (c)	employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary.			

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
	<p>Notes:</p> <ul style="list-style-type: none"> <li>Alternative funding arrangements for long term management of the Biodiversity Offset Strategy, such as provision of capital and management funding as agreed by OEH as part of a BioBanking Agreement, or transfer to conservation reserve estate can be used to reduce the liability of the Biodiversity and Rehabilitation Bond.</li> <li>If capital and other expenditure required by the Biodiversity and Rehabilitation Management Plan is largely complete, the Secretary may waive the requirement for lodgement of a bond in respect of the remaining expenditure.</li> <li>If the Biodiversity Offset Strategy and/or rehabilitation of the site area are completed (or partially completed) to the satisfaction of the Secretary, then the Secretary will release the bond (or relevant part of the bond). If the Biodiversity Offset Strategy and rehabilitation of the site are 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.</li> <li>Any redundant rehabilitation or biodiversity bonds currently held by the Department in relation to the development may be released following acceptance of the Biodiversity and Rehabilitation bond required under this condition.</li> </ul>			
38	The Biodiversity and Rehabilitation Bond must be reviewed and (if required), an updated bond must be lodged with the Department within 3 months following:			
38 (a)	an update or revision to the Biodiversity and Rehabilitation Management Plan;	Compliant	HR107-2022 HR106-2022	The current BRMP was approved by DPE on 16 November 2020. A review of the Biodiversity and Rehabilitation Bond was completed by 10 February 2021. An updated BRMP (version dated 30 November 2022) was submitted to DPE (Now DPHI) but has not yet been approved. A review of the bond will be required following approval of the updated BRMP.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
38 (b)	the completion of an Independent Environmental Audit in which recommendations relating to the implementation of the Biodiversity Offset Strategy and/or rehabilitation of the site have been made; or	Not Triggered		No recommendations relating to the Biodiversity Offset Strategy or rehabilitation of the site were made in the 2022 Independent Environmental Audit and therefore has not triggered this requirement.
38 (c)	in response to a request by the Secretary.	Not Triggered	Advice from Environmental Officer	No such requests were received from the Secretary during the audit period.
<b>VISUAL</b>				
39	The Applicant must implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the development to the satisfaction of the Secretary.	Compliant	Observation	No significant lighting sources were observed during the site inspection and no complaints relating to lighting were received during the audit period. Approved hours of operation (6:00am to 6:00pm) limit the potential for lighting impacts.
<b>WASTE</b>				
40	The Applicant must:			
40 (a)	manage on-site sewage treatment and disposal in accordance with the requirements of its EPL, and to the satisfaction of the EPA and Council;	Compliant	Advice from Environmental Officer HR24-2025	Approvals for the Operation of a System of Sewage Management issued 20 December 2022 and 6 February 2025 by the Hills Shire Council for the on-site sewage management facilities.
40 (b)	minimise the waste generated by the development;	Compliant	Advice from Environmental Officer Observations.	Waste minimisation is targeted through daily/weekly/monthly site inspections of the waste management and recycling system and the discussion of waste management issues during toolbox meetings. Appropriate waste bin labelling was sighted during the site inspection.
40 (c)	ensure that the waste generated by the development is appropriately stored, handled, and disposed of; and	Compliant	Observations HR04-2025 HR05-2025 HR06-2025	Waste was observed to be appropriately stored on site during the site inspection. A range of 'historical' waste not generated by the development has been collected and should be removed from site (see <b>Improvement HR 15/25</b> ). Waste registers contained in the Annual Reviews during the audit period indicate that appropriate waste collection and disposal procedures have been implemented.

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
40 (d)	report on waste management and minimisation in the Annual Review, to the satisfaction of the Secretary.	Compliant	HR04-2025 HR05-2025 HR06-2025	Waste management and minimisation are reported in the Annual Reviews during the audit period.
41	Except as expressly permitted in an EPL and/or the conditions of this consent, the Applicant must not receive waste on the site for storage, treatment, processing, reprocessing or disposal.	Compliant	HR04-2025 HR05-2025 HR06-2025	Annual Reviews indicate that no waste, including VENM, was received at the Quarry during the audit period.
<b>Liquid Storage</b>				
42	The Applicant must ensure that all tanks and similar storage facilities (other than for water) are protected by appropriate bunding or other containment, in accordance with the relevant Australian Standards.	Compliant	Observation Photos E1022C_099 and 100 Advice from Operations Manager	A mobile diesel tanker was observed within a dedicated area Cell 1B. It is advised that the tank meets the requirements of a double skinned tank (and included a fully stocked spill kit).
<b>Dangerous Goods</b>				
43	The Applicant must ensure that the storage, handling, and transport of dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.	Compliant	Observation Photos E1022C_099, 100, 139, 140 Advice from Operations Manager HR10-2025	A mobile diesel tanker was observed within a dedicated area Cell 1B. It is advised that the tank meets the requirements of a double skinned tank and included a fully stocked spill kit. Oils and other hydrocarbons stored within the workshop shed were stored on bunded pallets undercover with fully stocked spill kits available. Proactive measures concerning dangerous goods management are outlined in the PIRMP.
<b>Bushfire</b>				
44 44 (a)	The Applicant must: ensure that the development is suitably equipped to respond to any fires on site; and	Compliant	HR86-2022 HR87-2022 Observations	Section 5 of the BMP outlines bushfire management and mitigation measures. Fire extinguishers and fire extinguisher service records were observed during the site inspection.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 3 SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)</b>				
<b>BIODIVERSITY AND REHABILITATION (Cont'd)</b>				
44 (b)	assist the Rural Fire Service and emergency services to the extent practicable if there is a fire in the vicinity of the site.	Compliant	HR86-2022 HR87-2022 Advice from Managing Director and Environmental Officer	Section 7 of the BMP outlines responsibilities of all employees and contractors, including assisting the RFS in firefighting where feasible. Dixon Sand continued to permit staff who are volunteer firefighters to take community service leave to assist the RFS, including the response to the Taree floods. The Quarry continued to facilitate RFS training during the audit period by providing access and machinery for training. The Quarry undertakes meetings with the RFS representative to review the severity of the forecasted bushfire season for the coming year, risk management of quarry operations associated with bushfire response, review of the changes to the mitigation measures in the bushfire management plans, water sources for firefighting, all water carts have RFS adapters. The Quarry also made regular monetary donations to the local Maroota Rural Fire Brigade during the audit period.
45	Within 6 months of the determination of Modification 1, the Applicant must prepare a Bushfire Management Plan for the site in consultation with Council and to the satisfaction of the Rural Fire Service.	Compliant	HR86-2022 HR87-2022	The BMP was prepared by June 2018, within 6 months of the determination of Mod 1 in January 2018. Consultation with the Hills Shire Council is presented as Appendix 1 of the BMP. The current approved version of the BMP is dated October 2020.
<b>SCHEDULE 4 ADDITIONAL PROCEDURES</b>				
<b>Notification of Landowners</b>				
1 1 (a)	As soon as practicable, and no longer than 7 days, after obtaining monitoring results showing:  an exceedance of any criteria in Schedule 3, the Applicant must notify the affected landowners in writing of the exceedance, and provide regular monitoring results, at least every 3 months, to each affected landowner until the development is again complying with the relevant criteria; and	Not Triggered	-	Exceedance of the monthly and annual average deposited dust criteria recorded at monitoring location D10 (located on land owned by Dixon Sand) during the audit period were attributed to non-Quarry related activities or sources.  Exceedance of the 24-hour average PM <sub>10</sub> criteria recorded during the audit period was attributed to non-Quarry related activities or sources.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 4 ADDITIONAL PROCEDURES (Cont'd)</b>				
1 (b)	an exceedance of any air quality criteria in Schedule 3, the Applicant must send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and current tenants of the land (including the tenants of land which is not privately-owned).			
<b>Independent Review</b>				
2	<p>If a landowner considers the development to be exceeding the relevant criteria in Schedule 3, they may ask the Secretary in writing for an independent review of the impacts of the development on their land.</p> <p>If the Secretary is not satisfied that an independent review is warranted, the Secretary will notify the landowner in writing of that decision, and the reasons for that decision, within 21 days of the request for a review.</p> <p>If the Secretary is satisfied that an independent review is warranted, within 3 months, or as otherwise agreed by the Secretary and the landowner, of the Secretary's decision, the Applicant must:</p>	Not Triggered	Advice from Environmental Officer	No landowner requested an independent review of impacts associated with the Quarry during the audit period.
2 (a)	<p>commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to:</p> <ul style="list-style-type: none"> <li>• consult with the landowner to determine his/her concerns;</li> <li>• conduct monitoring to determine whether the development is complying with the relevant criteria in Schedule 3; and</li> <li>• if the development is not complying with these criteria, then identify measures that could be implemented to ensure compliance with the relevant criteria;</li> </ul>			
2 (b)	give the Secretary and landowner a copy of the independent review; and			
2 (c)	comply with any written requests made by the Secretary to implement any findings of the review.			

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING</b>				
<b>ENVIRONMENTAL MANAGEMENT</b>				
<b>Environmental Management Strategy</b>				
1	The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	Compliant	HR07-2025	The current approved EMS is dated January 2024 and was approved by DPHI 18 January 2024.
1 (a)	be submitted to the Secretary for approval within 6 months of the approval of Modification 1, unless otherwise agreed by the Secretary;	Compliant	HR34-2019	Mod 1 was approved on 22 January 2018. An updated EMS was submitted to DPE on 18 July 2018.
1 (b)	Provide the strategic framework for the environmental management of the development;	Compliant	HR07-2025	The EMS provides the strategic framework for the Quarry.
1 (c)	identify the statutory approvals that apply to the development;	Compliant	HR07-2025	Section 2 of the EMS identifies the statutory approvals applicable to the Quarry.
1 (d)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Compliant	HR07-2025	Section 4 describes the roles and responsibilities of personnel associated with the Quarry.
1 (e)	describe the procedures to be implemented to: <ul style="list-style-type: none"> <li>keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> <li>receive, record, handle and respond to complaints;</li> <li>resolve any disputes that may arise during the course of the development;</li> <li>respond to any non-compliance;</li> <li>respond to emergencies; and</li> </ul>	Compliant	HR07-2025	Reporting, communication, complaint handling, dispute resolution, non-compliance response and emergency response protocols are included in the EMS.
1 (f)	include: <ul style="list-style-type: none"> <li>copies of any strategies, plans and programs approved under the conditions of this consent; and</li> <li>a clear plan depicting all the monitoring to be carried out under the conditions of this consent.</li> </ul>	Compliant	HR07-2025 HR11-2025	Copies of the relevant plans are included as appendices to the EMS. Monitoring locations are shown in the Environmental Monitoring Locations document and monitoring procedures are detailed in the relevant plans.
	The Applicant must implement any Environmental Management Strategy as approved by the Secretary.	Compliant	HR07-2025	The site currently operates under the Environmental Management Strategy dated January 2024.

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>ENVIRONMENTAL MANAGEMENT (Cont'd)</b>				
<b>Evidence of Consultation</b>				
2	Where consultation with any State or local agency is required by the conditions of this consent, the Applicant must:	Compliant	HR07-2025 HR08-2025 HR10 to 16-2025 HR33-2025 HR34-2025 HR80-2022 HR86-2022 HR87-2022	Consultation is included in the EMS and as appendices to the relevant plans. Consultation is discussed in the relevant plans.
2 (a)	consult with the relevant agency prior to submitting the required document to the Secretary for approval;	Compliant		
2 (b)	submit evidence of this consultation as part of the relevant document;	Compliant		
2 (c)	describe how matters raised by the agency have been addressed and any matters not resolved; and	Compliant		
2 (d)	include details of any outstanding issues raised by the agency and an explanation of disagreement between any agency and the Applicant.	Compliant		
<b>Management Plan Requirements</b>				
3	The Applicant must ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include:	Compliant	HR07-2025 HR08-2025 HR10 to 16-2025 HR33-2025 HR34-2025 HR80-2022 HR86-2022 HR87-2022	Plans contain all identified components and have been prepared in accordance with the relevant guidelines, where applicable. Appendix 1 of the EMS provides a Plan Preparation Checklist and Certification confirming plan component inclusion.
3 (a)	detailed baseline data;			
3 (b)	a description of: <ul style="list-style-type: none"> <li>the relevant statutory requirements (including any relevant approval, licence or lease conditions);</li> <li>any relevant limits or performance measures/criteria; and</li> <li>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;</li> </ul>			
3 (c)	a description of the measures that to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Compliant		

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>ENVIRONMENTAL MANAGEMENT (Cont'd)</b>				
3 (d)	a program to monitor and report on the: <ul style="list-style-type: none"> <li>impacts and environmental performance of the development; and</li> <li>effectiveness of any management measures (see (c) above);</li> </ul>	Compliant		
3 (e)	a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible;	Compliant	HR07-2025 HR08-2025 HR10 to 16-2025	Plans contain all identified components and have been prepared in accordance with the relevant guidelines, where applicable. Appendix 1 of the EMS provides a Plan Preparation Checklist and Certification confirming plan component inclusion.
3 (f)	a program to investigate and implement ways to improve the environmental performance of the development over time;	Compliant	HR33-2025 HR34-2025 HR80-2022	
3 (g)	a protocol for managing and reporting any: <ul style="list-style-type: none"> <li>incidents;</li> <li>complaints;</li> <li>non-compliances with statutory requirements; and</li> <li>exceedances of the impact assessment criteria and/or performance criteria; and</li> </ul>	Compliant	HR86-2022 HR87-2022	
3 (h)	a protocol for periodic review of the plan.	Compliant		
	<i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	-	-	Noted
<b>Application of Existing Strategies, Plans and Programs</b>				
4	The Applicant must continue to apply existing management plans, strategies or monitoring programs approved prior to the approval of Modification 1, until the approval of a similar plan, strategy or program following the approval of Modification 1.	Compliant	Advice from Environmental Officer	The Quarry was operated under existing management plans until revised plans were approved following the determination of Modification 1.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>ENVIRONMENTAL MANAGEMENT (Cont'd)</b>				
<b>Revision of Strategies, Plans &amp; Programs</b>				
5	<p>Within 3 months of the submission of an:</p> <p>(a) incident report under Condition 10 below;</p> <p>(b) Annual Review under Condition 12 below;</p> <p>(c) Independent Environmental Audit report under Condition 14 below; and</p> <p>(d) any modifications to this consent,</p> <p>the Applicant must review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. The Applicant must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary.</p> <p><i>Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.</i></p>	<b>Non-compliant</b>	<p>HR109-2022 HR110-2022 HR111-2022 HR112-2022 HR113-2022 HR52-2025 HR53-2025 HR54-2025 HR55-2025</p>	<p>During the audit period a total of 21 'incident' reports were submitted during the audit period. Of these 18 related to elevated dust levels. None of the exceedances were attributed to the Quarry and therefore no non-compliance was recorded against the relevant conditions in Schedule 3 of this approval. It is advised that no updates to the management plans were required, however, the Department weren't notified. See <b>Recommendation HR R7/25</b> and <b>Improvement HR I6/25</b>.</p> <p>Management plans were otherwise reviewed within appropriate timeframes following the submission of Annual Reviews during the audit period, the 2022 IEA and the 2023 MOD6. Reviews were lodged to the Department, as required. However, the BRMP was not resubmitted within 6 weeks with outstanding matters to be addressed (see <b>Recommendation HR R6/25</b>).</p>
<b>Updating and Staging of Strategies, Plans or Programs</b>				
6	<p>To ensure that strategies, plans or programs required under this consent are updated on a regular basis, and that they incorporate any appropriate additional measures to improve the environmental performance of the development, the Applicant may at any time submit revised strategies, plans or programs for the approval of the Secretary. With the agreement of the Secretary, the Applicant may also submit any strategy, plan or program required by this consent on a staged basis.</p>	-	-	Noted.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>ENVIRONMENTAL MANAGEMENT (Cont'd)</b>				
	<p>The Secretary may approve a revised strategy, plan or program required under this consent, or the staged submission of any of these documents, at any time. With the agreement of the Secretary, the Applicant may prepare the revised or staged strategy, plan or program without undertaking consultation with all parties nominated under the applicable condition in this consent.</p> <p>While any strategy, plan or program may be submitted on a staged basis, the Applicant will need to ensure that the operations associated with the development are covered by suitable strategies, plans or programs at all times.</p> <p>If the submission of any strategy, plan or program is to be staged; then the relevant strategy, plan or program must clearly describe the specific stage/s of the development to which the strategy, plan or program applies; the relationship of this stage/s to any future stages; and the trigger for updating the strategy, plan or program.</p>			
<b>Adaptive Management</b>				
7	<p>The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Any exceedance of these criteria or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&amp;A Act or EP&amp;A Regulation.</p> <p>Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity:</p>	Compliant	HR04-2025 HR05-2025 HR06-2025	Whilst exceedances of the dust criteria were recorded during the audit period these were determined not to be Quarry-related. Incident reports confirming this were submitted in accordance with Schedule 5 Condition 10. It has been determined that no non-compliance with the relevant conditional requirements of Schedule 3 occurred during the audit period.
7 (a)	take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur;	Not Triggered		
7 (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	Not Triggered		
7 (c)	implement reasonable remediation measures as directed by the Planning Secretary.	Not Triggered		

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>ENVIRONMENTAL MANAGEMENT (Cont'd)</b>				
<b>Community Consultative Committee</b>				
8	<p>The Applicant must establish and operate a Community Consultative Committee (CCC) for the development to the satisfaction of the Secretary. The CCC must be established by 30 June 2018 and operated in general accordance with the Department's Community Consultative Committee Guidelines, November 2016 (or later version).</p> <p>Notes:</p> <ul style="list-style-type: none"> <li>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</li> <li>In accordance with the guidelines, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council and the local community.</li> <li>The CCC established and operated prior to the approval of Modification 1 must continue to be operated in accordance with the procedures required by the consent prior to the approval of Modification 1 until such time as the CCC required by this condition is established.</li> <li>The Applicant may, with the approval of the Secretary, combine the function of this CCC with the functions of other CCCs in the area.</li> </ul>	Compliant	HR51-2019 <b>Table 2.2</b>	<p>Approval from DPE on 1 March 2018 to maintain existing CCC arrangement.</p> <p>The CCC operated throughout the audit period with seven meetings held in this time.</p>

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>REPORTING</b>				
<b>Incident Notification</b>				
9	The Proponent 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.	<b>Non-compliant</b>	HR04-2025 HR05-2025 HR06-2025 Advice from Environmental Officer	During the audit period a total of 21 'incidents' were recorded during the audit period. Of these 3 related to 'late' submission of the Annual Review, although the revised submission date has previously been approved by DPHI. The remaining 18 related to elevated dust levels. Incident reports were submitted as relevant, however, the incident reports were submitted "to provide the specific details of the dust deposition exceedance as required by Conditions 9 and 10, Schedule 5". Whilst it is acknowledged that the reports were likely provided the same day as becoming aware of the exceedance this does not technically meet the requirement to immediately notify. <b>Recommendation HR R8/25.</b>
<b>Non-Compliance Notification</b>				
10	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.	Not Determined	As above	The date from which the Company became aware of each 'incident' is not recorded within the incident reports ( <b>Recommendation HR R8/25</b> ).
<b>Regular Reporting</b>				
11	The Applicant must 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.	Compliant	Dixon Quarry Group Website HR04-2025 HR05-2025 HR06-2025	Up to date monitoring data required under the DA and various management plans for the Quarry is available on the Dixon Quarry Group website. Copies of Annual Reviews, truck movement records, noise monitoring results and EPL monitoring data are also available of the Dixon Quarry Group website.

**Table A4-1 (Cont'd)**  
**Compliance Review – Development Consent DA 165-7-2005**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>REPORTING (Cont'd)</b>				
<b>Annual Review</b>				
12	By the end of March each year, or other timing as may be agreed by the Secretary, the Applicant must submit a review to the Department reviewing the environmental performance of the development to the satisfaction of the Secretary. This review must:	Compliant	HR04-2025 HR05-2025 HR06-2025 Advice from Environmental Officer	Annual reviews were submitted by the relevant date (financial year periods) during the audit period. Approval to submit Annual Reviews by the end of September was granted by DPE (now DPHI) on 9 February 2018.
12 (a)	describe the development (including any progressive rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;	Compliant	HR04-2025 HR05-2025 HR06-2025	Annual Reviews during the audit period describe development and rehabilitation activities during the audit period as well as proposed activities during the next audit period.
12 (b)	include a comprehensive review of the monitoring results and complaints records of the development over the previous calendar year, which includes a comparison of these results against the: <ul style="list-style-type: none"> <li>relevant statutory requirements, limits or performance measures/criteria;</li> <li>requirements of any plan or program required under this consent;</li> <li>monitoring results of previous years; and</li> <li>relevant predictions in the documents listed in Condition 2(a) of Schedule 2;</li> </ul>	Compliant		Annual Reviews during the audit period include a review of monitoring results and a comparison of these results against relevant criteria, plans, results from previous years, and predictions listed in relevant previous assessments.
12 (c)	evaluate and report on: <ul style="list-style-type: none"> <li>the effectiveness of the air quality and noise management systems; and</li> <li>compliance with the performance measures, criteria and operating conditions in this consent.</li> </ul>	Compliant		Annual Reviews during the audit period evaluate the effectiveness of management systems and impacts associated with air and noise emissions with reference to relevant criteria and operating conditions.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>REPORTING (Cont'd)</b>				
12 (d)	identify any non-compliance over the past calendar year, and describe what actions were (or are being) taken to ensure compliance;	Compliant		Non-compliances and follow up actions (if required) are discussed in the Annual Reviews during the audit period.
12 (e)	identify any trends in the monitoring data over the life of the development;	Compliant		Trends in historical monitoring data are discussed in the Annual Reviews during the audit period.
12 (f)	identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and	Compliant		Discrepancies between predicted and actual impacts of the development are discussed in Annual Reviews during the audit period.
12 (g)	describe what measures will be implemented over the current calendar year to improve the environmental performance of the development.	Compliant		Changes to environmental procedures (if any) are identified in Annual Reviews for the audit period.
	The Applicant must ensure that copies of the Annual Review are submitted to Council and are available to the Community Consultative Committee (see Condition 8 of Schedule 5) and any interested person upon request.	Compliant	Dixon Quarry Group Website Advice from Environmental Officer	Annual Reviews during the audit period were distributed to the relevant stakeholders via email and were available on the Dixon Quarry Group website.
<b>Independent Environmental Audit</b>				
13	By the end of November 2019, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission, commence and pay the full cost of an Independent Environmental Audit of the development. This audit must	Compliant	This Audit	2019 IEA commenced in October 2019. 2022 IEA commenced in October 2022 This audit commenced in November 2025.
13 (a)	be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary	Compliant	<b>Appendix 1</b>	The RWC audit team consisting of Scott Hollamby as lead auditor and Sam Wells in an assisting role was confirmed by DPE on 23 October 2025 (see <b>Appendix 1</b> ).
13 (b)	include consultation with the relevant agencies and the CCC;	Compliant	<b>Appendix 3</b>	Consultation for the audit was undertaken with DPE, BCD, EPA, NRAR, TfNSW, RR, HSC and CCC.

Table A4-1 (Cont'd)  
Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>REPORTING (Cont'd)</b>				
13 (c)	assess the environmental performance of the development and whether it is complying with the relevant requirements in this consent and any relevant EPL or necessary water licences for the development (including any assessment, strategy, plan or program required under these approvals);	Compliant	<b>Appendix 4</b>	-
13 (d)	review the adequacy of strategies, plans or programs required under the abovementioned approvals;	Compliant	Section 3.1.4	-
13 (e)	recommend appropriate measures or actions to improve the environmental performance of the development, and/or any assessment, strategy, plan or program required under the abovementioned approvals; and	Compliant	Section 4	-
13 (f)	be conducted and reported to the satisfaction of the Secretary.	Compliant	HR114-2022 This Audit	DPIE confirmed satisfaction with the 2022 IEA on 13 March 2023 following a response to a request for information. The satisfaction of the Secretary with this audit report is not yet known.
14	Within 12 weeks of commencing this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Applicant must implement these recommendations, to the satisfaction of the Secretary.	Compliant	HR61-2022	The 2022 IEA was submitted to DPIE on 16 January 2023, i.e. within the nominated 12 week period. Submission of the 2025 audit and response to the recommendations will occur following the finalisation of this audit.
<b>Access to Information</b>				
15	Within 3 months of the determination of Modification 1, until the completion of all works, including rehabilitation and remediation the Applicant must:	Compliant	Advice from Environmental Officer	All relevant information was available on the Dixon Sand website within 3 months of the determination of Modification 1 and was current as at the date of this Audit.

Table A4-1 (Cont'd)  
 Compliance Review – Development Consent DA 165-7-2005

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>SCHEDULE 5 ENVIRONMENTAL MANAGEMENT REPORTING AND AUDITING (Cont'd)</b>				
<b>REPORTING (Cont'd)</b>				
15 (a)	make the following information publicly available on its website: <ul style="list-style-type: none"> <li>• the documents listed in Condition 2(a) of Schedule 2;</li> <li>• current statutory approvals for the development;</li> <li>• all approved strategies, plans and programs required under the conditions of this consent;</li> <li>• a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs;</li> <li>• a complaints register, updated monthly;</li> <li>• the annual reviews of the development;</li> <li>• any independent environmental audit as described in Condition 13 above, and the Applicant's response to the recommendations in any audit; and</li> <li>• any other matter required by the Secretary; and</li> </ul>	Compliant	Dixon Quarry Group Website	All relevant approvals, plans, annual reviews, monitoring result summaries, and complaints are available on the Dixon Quarry Group website.
15 (b)	keep this information up-to-date, to the satisfaction of the Secretary.	Compliant	Dixon Quarry Group Website	Information on the Dixon Quarry Group website is up to date, as required.

Table A4-2  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions												
<b>1 Administrative Condition</b>																
<b>A1 What the licence authorises and regulates</b>																
A1.1	<p>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.</p> <p>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.</p> <table border="1"> <thead> <tr> <th>Scheduled Activity</th> <th>Fee Based Activity</th> <th>Scale</th> </tr> </thead> <tbody> <tr> <td>Crushing, grinding or separating</td> <td>Crushing, grinding or separating</td> <td>&gt; 100000 - 500000 T annual processing capacity</td> </tr> <tr> <td>Extractive activities</td> <td>Extractive activities</td> <td>&gt; 100000 - 500000 T annually extracted or processed</td> </tr> <tr> <td>Resource recovery</td> <td>Recovery of general waste</td> <td>Any general waste recovered</td> </tr> </tbody> </table>	Scheduled Activity	Fee Based Activity	Scale	Crushing, grinding or separating	Crushing, grinding or separating	> 100000 - 500000 T annual processing capacity	Extractive activities	Extractive activities	> 100000 - 500000 T annually extracted or processed	Resource recovery	Recovery of general waste	Any general waste recovered	Compliant	HR04-2025 HR05-2025 HR06-2025	<p>Production data included in Annual Reviews during the audit period indicates that operations did not exceed the relevant activity scale.</p> <ul style="list-style-type: none"> <li>• 2022/2023 = 289,769.14t.</li> <li>• 2023/2024 = 444,021t.</li> <li>• 2024/2025 = 399,279.60t.</li> </ul>
Scheduled Activity	Fee Based Activity	Scale														
Crushing, grinding or separating	Crushing, grinding or separating	> 100000 - 500000 T annual processing capacity														
Extractive activities	Extractive activities	> 100000 - 500000 T annually extracted or processed														
Resource recovery	Recovery of general waste	Any general waste recovered														
<b>A2 Premises or plant to which this licence applies</b>																
A2.1	<p>The licence applies to the following premises:</p> <table border="1"> <thead> <tr> <th>Premises Details</th> </tr> </thead> <tbody> <tr> <td>DIXON SAND PTY LTD</td> </tr> <tr> <td>HAERSES ROAD AND INTERSECTION OF WISEMANS FERRY ROAD</td> </tr> <tr> <td>MARROOTA</td> </tr> <tr> <td>NSW 2756</td> </tr> <tr> <td>LOT A DP 407341, LOT B DP 407341, LOT 170 DP 664766, LOT 170 DP 664767, LOT 176 DP 752039, LOT 177 DP 752039, LOT 216 DP 752039</td> </tr> </tbody> </table>	Premises Details	DIXON SAND PTY LTD	HAERSES ROAD AND INTERSECTION OF WISEMANS FERRY ROAD	MARROOTA	NSW 2756	LOT A DP 407341, LOT B DP 407341, LOT 170 DP 664766, LOT 170 DP 664767, LOT 176 DP 752039, LOT 177 DP 752039, LOT 216 DP 752039	-	-	Noted						
Premises Details																
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MARROOTA																
NSW 2756																
LOT A DP 407341, LOT B DP 407341, LOT 170 DP 664766, LOT 170 DP 664767, LOT 176 DP 752039, LOT 177 DP 752039, LOT 216 DP 752039																

Table A4-2 (Cont'd)  
 Compliance Review – EPL 12513

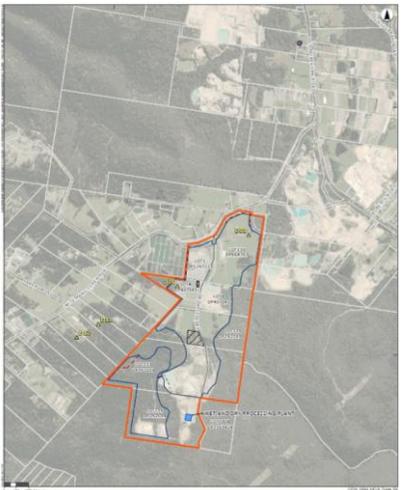
Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions		
A2.2	The premises location is shown on the map below. 	-	-	Noted		
A2.3	The boundary of the premises is defined within the orange line on the aerial map at Condition A2.2.	-	-	Noted		
<b>A3 Other activities</b>						
A3.1	This licence applies to all other activities carried on at the premises, including: <table border="1" data-bbox="295 1171 958 1225"> <tr> <td data-bbox="295 1171 958 1203">Ancillary Activity</td> </tr> <tr> <td data-bbox="295 1203 958 1225">Receipt and processing of VENM and receipt of ENM.</td> </tr> </table>	Ancillary Activity	Receipt and processing of VENM and receipt of ENM.	-	-	Noted
Ancillary Activity						
Receipt and processing of VENM and receipt of ENM.						

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																
<b>A4 Information supplied to the EPA</b>																				
A4.1	<p>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.</p> <p>In this condition the reference to “the licence application” includes a reference to:</p> <p>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</p> <p>b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</p>	Compliant	HR28-2019	A letter dated 13 June 2006 which accompanied the EPL application for the Quarry indicates that the EPL application was made in accordance with details contained in Development Consent 165-7-2005, Notice of Modification DA 250-9-2001-MOD, and two maps of the site. Works and activities have generally been carried out in accordance with the activities described in these documents.																
<b>2 Discharges to Air and Water and Applications to Land</b>																				
<b>P1 Location of monitoring/discharge points and areas</b>																				
P1.1	<p>The following points referred to in the table below are identified in this licence for the purposes of monitoring and/or the setting of limits for the emission of pollutants to the air from the point.</p> <table border="1" data-bbox="293 954 958 1114"> <thead> <tr> <th colspan="4"><i>Air</i></th> </tr> <tr> <th>EPA identification no.</th> <th>Type of Monitoring Point</th> <th>Type of Discharge Point</th> <th>Location Description</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>Ambient air monitoring</td> <td></td> <td>Ambient air monitoring site location near the Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided 30 November 2004.</td> </tr> <tr> <td>3</td> <td>Ambient air monitoring</td> <td></td> <td>Dust deposition gauge located on the site between Stage 4 works and the west dam on the site near Stage 4 works</td> </tr> </tbody> </table>	<i>Air</i>				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Ambient air monitoring		Ambient air monitoring site location near the Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided 30 November 2004.	3	Ambient air monitoring		Dust deposition gauge located on the site between Stage 4 works and the west dam on the site near Stage 4 works	-	--	Noted
<i>Air</i>																				
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																	
1	Ambient air monitoring		Ambient air monitoring site location near the Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided 30 November 2004.																	
3	Ambient air monitoring		Dust deposition gauge located on the site between Stage 4 works and the west dam on the site near Stage 4 works																	
P1.2	<p>The following points referred to in the table below are identified in this licence for the purposes of weather and/or noise monitoring and/or setting limits for the emission of noise from the premises.</p> <table border="1" data-bbox="293 1225 958 1361"> <thead> <tr> <th colspan="3"><i>Noise/Weather</i></th> </tr> <tr> <th>EPA identification no.</th> <th>Type of monitoring point</th> <th>Location description</th> </tr> </thead> <tbody> <tr> <td>2</td> <td>Meteorological Station</td> <td>Meteorological station near Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided to the DEC (by Fax) on 30 November 2004</td> </tr> </tbody> </table>	<i>Noise/Weather</i>			EPA identification no.	Type of monitoring point	Location description	2	Meteorological Station	Meteorological station near Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided to the DEC (by Fax) on 30 November 2004	-	-	Noted							
<i>Noise/Weather</i>																				
EPA identification no.	Type of monitoring point	Location description																		
2	Meteorological Station	Meteorological station near Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided to the DEC (by Fax) on 30 November 2004																		

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions										
<b>3 Limit Conditions</b>														
<b>L1 Pollution of water</b>														
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.	Compliant	HR04-2025 HR05-2025 HR06-2025	No discharges of water were reported for the Quarry during the audit period. No incidents regarding the pollution of water were recorded during the audit period.										
<b>L2 Waste</b>														
L2.1	<p>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</p> <p>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</p> <p>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</p> <p>This condition does not limit any other conditions in this licence.</p> <table border="1"> <thead> <tr> <th>Code</th> <th>Waste</th> <th>Description</th> <th>Activity</th> <th>Other Limits</th> </tr> </thead> <tbody> <tr> <td>NA</td> <td>Waste</td> <td>Waste received must be VENM or ENM that meets all the conditions of a resource recovery order (made under clause 93 of the POEO (Waste) Regulation 2019) at the time it is received.</td> <td>-</td> <td>No more than 250,000 tonnes of VENM and ENM in total, can be received at the premises in any calendar year.</td> </tr> </tbody> </table>	Code	Waste	Description	Activity	Other Limits	NA	Waste	Waste received must be VENM or ENM that meets all the conditions of a resource recovery order (made under clause 93 of the POEO (Waste) Regulation 2019) at the time it is received.	-	No more than 250,000 tonnes of VENM and ENM in total, can be received at the premises in any calendar year.	Compliant	HR04-2025 HR05-2025 HR06-2025	<p>The 2022/2023, 2023/2024 and 2024/2025 Annual Reviews indicate no VENM was received at the Quarry site during the audit period.</p> <ul style="list-style-type: none"> <li>• 2022 = nil</li> <li>• 2023 = nil</li> <li>• 2024 = nil</li> <li>• 2025 = nil (to June 2025).</li> </ul> <p>DA165-7-2005 permits the importation of up to 100,000t of ENM/VENM material per calendar year.</p>
Code	Waste	Description	Activity	Other Limits										
NA	Waste	Waste received must be VENM or ENM that meets all the conditions of a resource recovery order (made under clause 93 of the POEO (Waste) Regulation 2019) at the time it is received.	-	No more than 250,000 tonnes of VENM and ENM in total, can be received at the premises in any calendar year.										
L2.2	The licensee must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal of any waste generated at the premises to be disposed of at the premises, except as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.	Compliant	HR04-2025 HR05-2025 HR06-2025  Advice from Environmental Officer	No waste generated outside the Quarry site was accepted for storage, treatment, processing, reprocessing or disposal during the audit period. ‘Historic’ waste collected on site should be removed (see <b>Improvement HR 15/25</b> ).										

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																																																							
<b>L3 Noise limits</b>																																																											
L3.1	<p>Noise generated at the premises must not exceed the noise limits presented in the table below. Note that the noise limits represent the noise contribution from the Haerses Road sand quarry site at Maroota.</p> <table border="1"> <thead> <tr> <th>Receiver</th> <th>Location</th> <th>Day</th> <th>Shoulder (6am to 7am)</th> <th>Shoulder (6am to 7am)</th> </tr> <tr> <th></th> <th></th> <th>LAeq(15 minutes)</th> <th>LAeq(15 minutes)</th> <th>LA(max)</th> </tr> </thead> <tbody> <tr> <td>R1</td> <td>1710 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R2</td> <td>1700 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R3</td> <td>1643 Wisemans Ferry Road</td> <td>40</td> <td>37</td> <td>52</td> </tr> <tr> <td>R4</td> <td>1617 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R6</td> <td>1543 Wisemans Ferry Road</td> <td>41</td> <td>35</td> <td>52</td> </tr> <tr> <td>R7</td> <td>1539 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R8</td> <td>1521 Wisemans Ferry Road</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td></td> <td>All other residences on privately owned land</td> <td>40</td> <td>35</td> <td>52</td> </tr> <tr> <td>R5</td> <td>1579 Wisemans Ferry Road</td> <td>41</td> <td>35</td> <td>52</td> </tr> </tbody> </table>	Receiver	Location	Day	Shoulder (6am to 7am)	Shoulder (6am to 7am)			LAeq(15 minutes)	LAeq(15 minutes)	LA(max)	R1	1710 Wisemans Ferry Road	40	35	52	R2	1700 Wisemans Ferry Road	40	35	52	R3	1643 Wisemans Ferry Road	40	37	52	R4	1617 Wisemans Ferry Road	40	35	52	R6	1543 Wisemans Ferry Road	41	35	52	R7	1539 Wisemans Ferry Road	40	35	52	R8	1521 Wisemans Ferry Road	40	35	52		All other residences on privately owned land	40	35	52	R5	1579 Wisemans Ferry Road	41	35	52	<b>Non-compliant</b>	<p>HR04-2025 HR05-2025 HR06-2025</p>	<p>Attended noise monitoring was undertaken during December 2022, June 2023, December 2023, June 2024, December 2024, and June 2025. Due to high ambient noise levels, the contribution of the Quarry operations had to be extrapolated at three locations for the December 2024 and June 2025 noise monitoring. Calculated results were 2dB(A) and 1dB(A) above criteria for Receiver R8. Whilst the noise monitoring report states that operations were compliant and that the significance of the residual noise level at Receiver R8 is likely negligible, it is considered that this remains an exceedance.</p> <p>It was advised that the calculations were complete assuming equipment was located at surface, however, most noise sources are located within the extraction area with substantial topographic shielding and that if this was taken into account compliance would likely have been predicted (<b>Recommendation HR R1/25</b>).</p> <p>Noise levels during all other Receivers and monitoring events were at or below the relevant criteria.</p>
Receiver	Location	Day	Shoulder (6am to 7am)	Shoulder (6am to 7am)																																																							
		LAeq(15 minutes)	LAeq(15 minutes)	LA(max)																																																							
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R5	1579 Wisemans Ferry Road	41	35	52																																																							
L3.2	<p>For the purpose of Condition L3.1</p> <ul style="list-style-type: none"> <li>Day is defined as the period from 7am to 6pm Sunday and Public Holidays.</li> <li>Night is defined as the period from 10pm to 7am Monday to Saturday and 10pm to 8am Sundays and Public Holidays.</li> </ul>	-	-	Noted																																																							

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
L3.3	<p>Noise from the premises is to be measured at the most affected point or within the residential boundary or the most affected point within 30m of the dwelling (rural situations) where the dwelling is more than 30m from the boundary to determine compliance with the LAeq(15 minutes) noise limit in Condition L3.1.</p> <p>Where it can be demonstrated that direct measurement of noise from the premises is impractical, the EPA may accept alternate means of determining compliance. See relevant chapter of NSW Noise Policy for Industry.</p> <p>The modification factors presented in Fact Sheet C of the NSW Noise Policy for Industry must also be applied to the measured noise levels where applicable.</p> <p>Definition: LA10(15 minutes) is the sound pressure level that is exceeded for 10% of the time when measured over a 15 minute period.</p> <p>Note: Noise measurement</p> <p>For the purpose of noise measures required for this condition, the LA10 noise level must be measured or computed at any point specified in the table above over a period of 15 minutes using "FAST" response on the sound level meter.</p>	Compliant	<p>HR04-2025 HR05-2025 HR06-2025</p> <p>Advice from Environmental Officer</p>	<p>The noise monitoring reports appended to the Annual Reviews for 2022/2023, 2023/2024 and 2024/2025 indicate that noise monitoring was conducted at appropriate locations with reference to listed residential receivers.</p> <p>Agreements exist between Dixon Sand and the owners of Residences R2 and R12. Noise management levels are therefore not applicable at these locations.</p>
	<p>For the purpose of the noise criteria for this Condition, 5dBA must be added to the measures level if the noise is substantially tonal or impulsive in character. The location or point of impact can be different for each development. Measurement locations can be:</p> <ul style="list-style-type: none"> <li>• 1 metre from the façade of the residence for night time assessment;</li> <li>• at the residential boundary, 30 metres from the residence (rural situations) where boundary is more than 30 metres from residence.</li> </ul>	Not Triggered	<p>HR04-2025 HR05-2025 HR06-2025</p>	<p>The noise monitoring reports confirm that no total, impulsive or low frequency noise characteristics were observed.</p>

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
L3.4	Noise from the premises is to be measured at 1 metre from the dwelling façade to determine compliance with the $L_{A(max)}$ noise level in Condition L3.1.	Compliant	HR04-2025 HR05-2025 HR06-2025	Attended noise monitoring was undertaken at-source and at receivers where permission to enter the property was granted. Where permission was not granted or where extraneous noises represented the dominant noise source, predicted noise levels were extrapolated from measurements taken from the near-distance location to the sensitive receiver location.
L3.5	The noise emission limits identified in Condition L3.1 apply under all meteorological conditions (wind speed up to 3m/s at 10 metres above ground level, except under conditions of temperature inversions) must be addressed by: <ul style="list-style-type: none"> <li>Documenting noise complaints received to identify any higher level of impacts or patterns of temperature inversions; and</li> <li>Where levels of noise complaints indicate a higher level of impact then actions to quantify and ameliorate any enhanced impacts under temperature inversions conditions should be developed and implemented.</li> </ul>	Compliant	HR04-2025 HR05-2025 HR06-2025	No noise-related complaints were received during the audit period.
L3.6	Activities at the premises, other than construction work, may only be carried out between 0600 hours and 1800 hours Monday to Saturday, and at no time on Sundays and Public Holidays.	Compliant	HR04-2025 HR05-2025 HR06-2025  Spot check truck despatch record	A spot check of despatch records (for 16/01/23, 13/12/23, 12/03/24, 03/09/24 and 24/03/25) undertaken during the site inspection indicated that the Quarry was operating within approved hours.
L3.7	This condition does not apply to the delivery of material outside the hours of operation permitted by Condition L3.6, if that delivery is required by police or other authorities for safety reasons; and/or the operation or personnel or equipment are endangered. In such circumstances, prior notification is provided to the EPA and affected residents as soon as possible, or within a reasonable period in the case of emergency.	Not Triggered	Advice from Environmental Officer	No deliveries or operations outside of approved hours were requested or required by authorities during the audit period.
L3.8	The hours of operation specified in Conditions L3.6 may be varied with written consent if the EPA is satisfied that the amenity of the residents in the locality will not be adversely affected.	-	-	Noted

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>L4 Potentially offensive odour</b>				
L4.1	The licensee must not cause or permit the emission of offensive odour beyond the boundary of the premises.  Note: Section 129 of the Protection of the Environment Operations Act 1997, provides that the licensee must not cause or permit the emission of any offensive odour from the premises but provides a defence if the emission is identified in the relevant environment protection licence as a potentially offensive odour and the odour was emitted in accordance with the conditions of a licence directed at minimising odour.	Compliant	Observation HR04-2025 HR05-2025 HR06-2025	No complaints were received during the audit period regarding the emission of offensive odours from the Quarry. No potential sources of offensive odour were noted during the audit inspection.
<b>4 Operating Conditions</b>				
<b>O1 Activities must be carried out in a competent manner</b>				
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.	Compliant	Observations Photo E1022C_102  HR04-2025 HR05-2025 HR06-2025	All processing, handling or movement of activities were observed during the site inspection to be undertaken in a competent manner.  No issues were identified with the storage of substances at the Quarry. The waste register provided in Annual Reviews during the audit period indicates that waste collection and disposal is undertaken appropriately. Whilst no leakage was observed, use of a covered skip is suggested where oily rags etc are placed (see <b>Improvement HR 17/25</b> )  No incidents involving the inappropriate operation of plant were recorded during the audit period.
<b>4 Operating Conditions</b>				
<b>O2 Maintenance of plant and equipment</b>				
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 b) must be operated in a proper and efficient manner.	Compliant	Observations.  Sighted servicing records.	Plant and equipment were observed to be well maintained and operated in a proper and efficient manner during the site inspection. Service records indicate maintenance of plant and equipment per OEM requirements.  Whilst a number of notices under WHS legislation were received during the audit period, these do not suggest a culture of improper or inefficient operation or potential for environmental impact.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>O3 Dust</b>				
O3.1	All operations and activities occurring at the premises must be carried out in a manner that will minimise the emission of dust from the premises.	Compliant	Observations HR04-2025 HR05-2025 HR06-2025	It is considered that the site has generally been maintained in a condition which minimises the emission of dust.
O3.2	Trucks entering and leaving the premises that are carrying loads must be covered at all times, except during loading and unloading.	Compliant	HR15-2025 Observation	The requirement for vehicles entering or leaving the site to have loads covered is outlined in Section 5 of the TMP.  All laden trucks were observed leaving the site during the site inspection were covered. Areas where trucks can pull over to check load covers and remove any loose material are also available prior to trucks exiting the site.
O3.3	The licensee must maintain and operate a continuous dust monitoring device at monitoring Point 1 identified in Condition P1.1. The device must be fitted with an automatic alarm system alerting quarry managers once the trigger value for PM <sub>10</sub> (42µg/m <sup>3</sup> ) is reached.	Compliant	Dixon Quarry Group Website HR04-2025 HR05-2025 HR06-2025 HR11-2025  Advice from Environmental Officer	Dust monitoring records present on Dixon Sand website. Dust monitoring results and calibration reported in Annual Reviews during the audit period.  Location of monitoring station shown in Environmental Monitoring Plan is consistent with Point 2 identified in Condition P1.1.  An alarm system sends text messages to Quarry personnel in the event of trigger value exceedances.
O3.4	Dust deposition gauges installed at the site must be operated and maintained in accordance with the current Australian Standard: <i>Ambient air - Particulate matter Determination of deposited matter expressed as insoluble solids, ash, combustible matter, soluble solids and total solids for deposition gauges.</i>	Compliant	HR04-2025 HR05-2025 HR06-2025	VGT Dust Deposition Reports, included as appendices to Annual Reviews, indicate sampling in accordance with AS3580.1.1 (supersedes AS 2724.1) and AS3580.9.8.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																				
O3.5	<p>The licensee must operate and maintain a continuous automatic meteorological station at monitoring Point 2 identified in Condition P1.2 of the licence according to the requirements of the current Australian Standard: <i>Ambient air - Guide for measurement of horizontal wind for air quality applications</i>.</p> <p>Wind monitoring components of the meteorological station must be interfaced with the continuous dust monitoring device identified in Condition P1.1.</p>	Compliant	HR04-2025 HR05-2025 HR06-2025 HR11-2025	<p>Meteorological data and calibration of the meteorological station reported in Annual Reviews during the audit period.</p> <p>Location of monitoring station shown in Environmental Monitoring Plan is consistent with Point 2 identified in Condition P1.2.</p>																				
O3.6	<p>The licensee must ensure that dust generated by the development does not cause any additional exceedances of the air quality impact assessment criteria listed in the table below at any residence on any privately owned land, listed in Condition L3.1.</p> <p>Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia AS 3580.10.1, <i>Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposition Matter - Gravimetric Methods</i>.</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Reference Condition</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP)</td> <td>Annual</td> <td>Long term</td> <td>90 ug/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt;10 um (PM10)</td> <td>Annual</td> <td>Long term</td> <td>30 ug/m<sup>3</sup></td> </tr> <tr> <td>Particulate matter &lt;10 um (PM10)</td> <td>24 hour</td> <td>Short term</td> <td>50 ug/m<sup>3</sup></td> </tr> <tr> <td>Deposited dust</td> <td>Annual</td> <td>Long term</td> <td>4g/m<sup>2</sup>/month (max total) 2g/m<sup>2</sup>/month (max increase)</td> </tr> </tbody> </table>	Pollutant	Averaging period	Reference Condition	Criterion	Total suspended particulate (TSP)	Annual	Long term	90 ug/m <sup>3</sup>	Particulate matter <10 um (PM10)	Annual	Long term	30 ug/m <sup>3</sup>	Particulate matter <10 um (PM10)	24 hour	Short term	50 ug/m <sup>3</sup>	Deposited dust	Annual	Long term	4g/m <sup>2</sup> /month (max total) 2g/m <sup>2</sup> /month (max increase)	Compliant	HR04-2025 HR05-2025 HR06-2025	<p>Whilst monthly and annual deposited dust levels exceeded the maximum deposited dust criteria, these results were not considered to be as a result of “dust generated by the development”.</p> <p>One elevated PM<sub>10</sub> measurement was recorded on 27 May 2025, reaching 71.7µg/m<sup>3</sup> and was associated with a dust storm in the region, with elevated dust results recorded at other dust monitoring stations located at Penrith, Prospect and Richmond. As a result the elevated result was not caused by Quarry operations.</p>
Pollutant	Averaging period	Reference Condition	Criterion																					
Total suspended particulate (TSP)	Annual	Long term	90 ug/m <sup>3</sup>																					
Particulate matter <10 um (PM10)	Annual	Long term	30 ug/m <sup>3</sup>																					
Particulate matter <10 um (PM10)	24 hour	Short term	50 ug/m <sup>3</sup>																					
Deposited dust	Annual	Long term	4g/m <sup>2</sup> /month (max total) 2g/m <sup>2</sup> /month (max increase)																					
<b>O4 Processes and management</b>																								
O4.1	<p>A Site Water Management Plan (SWMP) must be implemented at the premises. The plan must include a Soil and Water Management Plan, a Stormwater Management Scheme and a Groundwater Monitoring Program.</p>	Compliant	HR14-2025	<p>The site currently operates in accordance with the SWMP dated January 2024.</p> <p>Section 3 of the SWMP outlines the water management system for the Quarry which includes stormwater management.</p> <p>Section 5.2.2 of the SWMP includes a groundwater monitoring program.</p>																				

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
O4.2	The Soil and Water Management Plan must: a) describe what measures will be implemented to minimise soil erosion, and the discharge of sediment and other pollutants, during each stage of the development including: i) road and intersection works; ii) initial clearing and topsoil stripping; iii) extraction; and iv) noise bund construction.	Compliant	HR14-2025	Section 3.2 of the SWMP outlines erosion and sediment controls relevant to current operations. It also states that progressive Erosion and Sediment Control plans will be developed for the Quarry to cover changing site conditions.
	b) include control measures that have the capacity to contain rainfall and stormwater runoff generated from a 90th percentile, 5 day rainfall event for the life of the development.	Compliant	HR14-2025	Sediment basin design criteria have been prepared with consideration of a 90 <sup>th</sup> percentile, 5 day rainfall event.
O4.3	The Groundwater Monitoring Program must: a) describe what measures would be put in place to establish wet weather groundwater levels at the premises; b) monitor any potential adverse impacts of the development on groundwater levels and quality; c) detail contingency measures that would be put in place in the event that groundwater is breached and/or contaminated. The SWMP should be prepared in accordance with the requirements of <i>Managing Urban Stormwater Soil and Construction</i> Latest Edition.	Compliant	HR14-2025	Section 5.2.2 and Appendix 3 of the SWMP outline a groundwater monitoring program and the assessment undertaken to determine the wet weather groundwater levels at the Quarry. Section 6 includes response measures to be implemented in the event that groundwater is breached or contaminated.  The SWMP has been prepared in accordance with the Landcom (2004) guidelines <i>Managing Urban Stormwater – Soils and Construction</i> .
O4.4	The Stormwater Management Scheme mentioned in Condition O4.1 must mitigate the impacts of stormwater run-off from and within the premises at all times. The Scheme should be consistent with the Stormwater Management Plan for the catchment. Where a Stormwater Management Plan has not yet been prepared the Scheme should be consistent with the guidance contained in the latest edition of Landcom's Manual titled " <i>Managing Urban Stormwater Soil and Construction Volume 1</i> ".	Compliant	HR14-2025	The water management system for the Quarry, including management measures targeting stormwater, have been developed in accordance with the Landcom (2004) guideline <i>Managing Urban Stormwater - Soils and Construction, Volume1</i> .

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
O4.5	The licensee must construct and maintain sediment dams for every stage of the extraction area for the life of the quarry. Sediment dams must be in place prior to any extraction taking place in the respective strip of each stage and must be designed and constructed in accordance with the most recent edition of Managing Urban Stormwater Soil and Construction.  Notwithstanding the above, the dams must have sufficient capacity to contain rainfall and runoff generated from a 90th percentile, five day rainfall event ("the design event") for the life of the quarry.	Compliant	Observations HR14-2025	Sediment dams were sighted in the Stage 1 and Stage 2 (east and west) extraction areas and south of the Processing Plant during the site inspection.  The SWMP confirms sediment dams/basins have been designed in accordance with the Landcom (2204) guidelines <i>Managing urban Stormwater – Soils and Construction</i> and have been designed to capture runoff associated with the specified rainfall event.
O4.6	If mud, sediment or other raw materials are found to be tracked off the premises the Company must install, operate and maintain on the premises an automatic wheel wash or similar facility that will be capable of washing the underside of vehicles, wheels, wheel arches and axles of all vehicles leaving the premises. In addition to this, appropriate measures must be put in place that ensures that all vehicles leaving premises must go through the wheel wash facility.	Not Triggered	Observation  Photos E1022C_003, 008 to 011	No significant tracking of material onto public roads was observed during the site inspection. Notwithstanding, opportunities for improvement were noted (see <b>Recommendation HR R9/25</b> ), however, installation of a wheel wash was not considered warranted.
O4.7	The entrance to the premises must be maintained in a sealed state.	Compliant	Observation  Photos E1022C_004 and 005	The entry to the Quarry was observed to be sealed and well maintained with clear line markings, signage and no potholes or road deformation.
O4.8	The sealed access road to the premises must be kept free of dust, sediment and other raw materials at all times.	<b>Non-compliant</b>	Observation  Photos E1022C_003, 008 to 011	Minor tracking / deposition was observed on the exit side of the access road. This appears to primarily be originating from an unsealed truck pull over area on Haerses Road near the intersection with Wisemans Ferry Road. See <b>Recommendation HR R9/25</b>
O4.9	The licensee must prevent any tracking of mud on public roads by vehicles leaving the premises.	Compliant	Observation	No significant tracking of material onto public roads was observed during the site inspection. Notwithstanding, opportunities for improvement were noted (see <b>Recommendation HR R9/25</b> ),

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>O5 Waste management</b>				
O5.1	No more than 250,000 tonnes of VENM and ENM in total, can be received at the premises in any calendar year.  Note: ENM may be received at the premises, as per this condition, provided it meets the conditions of a resource recovery order at the time it is received.	Compliant	HR04-2025 HR05-2025 HR06-2025	The 2022/2023, 2023/2024 and 2024/2025 Annual Reviews indicate no VENM was received at the Quarry site during the audit period.  <ul style="list-style-type: none"> <li>• 2022 = nil</li> <li>• 2023 = nil</li> <li>• 2024 = nil</li> <li>• 2025 = nil (to June 2025).</li> </ul>
<b>5 Monitoring and Recording Conditions</b>				
<b>M1 Monitoring Records</b>				
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.	Compliant	Dixon Quarry Group Website HR04-2025 HR05-2025 HR06-2025	Monitoring data during the audit period has been recorded as required and is available on the Dixon Quarry Group Website.
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 c) produced in a legible form to any authorised officer of the EPA who asks to see them.	Compliant	Dixon Quarry Group Website HR04-2025 HR05-2025 HR06-2025	All monitoring records are available in a legible form for a period of >4years.
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 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.	Compliant	HR04-2025 HR05-2025 HR06-2025	Meteorological and dust monitoring required under the EPL are continuous and are recorded digitally. Data is included in the Annual Reviews which includes dates, times and the consultancy (VGT or CBased) which collect the samples.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions								
M1.4	The licensee must keep in an electronic format the following records for monitoring Point 1 identified in licence Condition P1.1: (a) each 15 minute PM <sub>10</sub> result; (b) each rolling 24-hour average PM <sub>10</sub> results (15 minutes); (c) each daily 24-hour average PM <sub>10</sub> result (midnight to midnight); and (d) the rolling annual average PM <sub>10</sub> result (each day, midnight to midnight, and over the total number of days of monitoring since monitoring began for first year of monitoring only).	Compliant	Observation	Monitoring data is collected continuously (recorded at 5 minute intervals) and provided monthly via Excel and is available through a web-hosted data portal which presents results at the required averaging periods. See suggested <b>Improvement HR I18/25</b> .								
M1.5	The licensee must keep in an electronic format the following records for Point 2 identified in licence Condition P1.2: each 15 minute, 1 hour and 24 hour result as indicated in the table at Condition M4.1.	Compliant	Observation	Meteorological station monitoring data containing the relevant information was sighted during the site inspection.								
<b>M2 Requirement to monitor concentration of pollutants discharged</b>												
M2.1	For each monitoring/discharge point or utilisation area specified below (by a point number), the licensee must monitor (by sampling and obtaining results by analysis) the concentration of each pollutant specified in Column 1. The licensee must use the sampling method, units of measure, and sample at the frequency, specified opposite in the other columns:	Compliant	HR04-2025 HR05-2025 HR06-2025	Meteorological reports are appended to the Annual Reviews and indicate compliance with units of measurement, frequency and sampling method for PM <sub>10</sub> .								
M2.2	Air Monitoring Requirements POINT 1 <table border="1" data-bbox="338 1018 1066 1090"> <thead> <tr> <th>Pollutant</th> <th>Units of measure</th> <th>Frequency</th> <th>Sampling Method</th> </tr> </thead> <tbody> <tr> <td>PM10</td> <td>micrograms per cubic metre</td> <td>Continuous</td> <td>Australian Standard 3580.9.8 - 2001</td> </tr> </tbody> </table>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	Australian Standard 3580.9.8 - 2001	Compliant	HR04-2025 HR05-2025 HR06-2025	Monitoring reports confirm use of correct units, frequency, and sampling method.
Pollutant	Units of measure	Frequency	Sampling Method									
PM10	micrograms per cubic metre	Continuous	Australian Standard 3580.9.8 - 2001									

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
M2.3	<p>If any rolling 24-hour average PM<sub>10</sub> result measured at Point 1 in licence Condition M2.2 is found to be greater than 42 µg/m<sup>3</sup> and the prevailing wind at the site is between 180 and 240 degrees as measured at Point 2:</p> <p>i) the licensee must take immediate action to reduce its PM<sub>10</sub> emissions;</p> <p>ii) the licensee must immediately notify the EPA Manager Sydney Industry;</p> <p>iii) if the dust level does not return to below 42 µg/m<sup>3</sup> within 1 hour then all dust generating activity on site must stop; and,</p> <p>iv) dust generating activity may only recommence when the rolling 24-hour average PM<sub>10</sub> result measured at Point 1 is less than 42 µg/m<sup>3</sup> for four consecutive 15-minute periods.</p>	Compliant	HR04-2025 HR05-2025 HR06-2025 HR60-2025	<p>Details of exceedances of the 42µg/m<sup>3</sup> level is recorded in the TEOM alarm register. During the audit period exceedances of the 42µg/m<sup>3</sup> level and during which the prevailing wind was within range occurred on:</p> <ul style="list-style-type: none"> <li>• 7 March 2023; and</li> <li>• 2 September 2024.</li> </ul> <p>Both exceedances were reported to EPA, appropriate measures undertaken and investigations concluded that exceedances were not Quarry-related.</p> <p>It is noted that the CBased reports appended to the Annual Reviews appear to report against daily PM<sub>10</sub> results rather than rolling 24-hour average PM<sub>10</sub> results for this EPA criteria (see <b>Improvement HR 18/25</b>).</p>
M2.4	A comprehensive written action plan must be developed and implemented to ensure compliance with Condition M2.3.	Compliant	HR12-2025	Section 5.2 of the AQMP details reactive management measures to ensure compliance with Condition M2.3.
<b>M3 Testing methods - concentration limits</b>				
	Note: <i>The Protection of the Environment Operations (Clean Air) Regulation 2021</i> requires testing for certain purposes to be conducted in accordance with test methods contained in the publication " <i>Approved Methods for the Sampling and Analysis of Air Pollutants in NSW</i> ".	-	-	Noted.
M3.1	<p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with:</p> <p>a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or</p> <p>b) if no such requirement is imposed by or under the Act, any methodology which a condition of this licence requires to be used for that testing; or</p> <p>c) if no such requirement is imposed by or under the Act or by a condition of this licence, any methodology approved in writing by the EPA for the purposes of that testing prior to the testing taking place.</p>	Compliant	HR04-2025 HR05-2025 HR06-2025	Monitoring reports appended to the Annual Reviews confirm use of correct units, frequency, and sampling method specified in Condition M2.2 of the EPL.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																														
<b>M4 Weather monitoring</b>																																		
M4.1	<p>At the point(s) identified below, the licensee must monitor (by sampling and obtaining results by analysis) the parameters specified in Column 1 of the table below, using the corresponding sampling method, units of measure, averaging period and sampling frequency, specified opposite in the Columns 2, 3, 4 and 5 respectively.</p> <p>POINT 2</p> <table border="1"> <thead> <tr> <th>Parameter</th> <th>Sampling method</th> <th>Units of measure</th> <th>Averaging period</th> <th>Frequency</th> </tr> </thead> <tbody> <tr> <td>Temperature at 10 metres</td> <td>AM-4</td> <td>degrees Celsius</td> <td>1 hour</td> <td>Continuous</td> </tr> <tr> <td>Wind Direction at 10 metres</td> <td>AM-2 &amp; AM-4</td> <td>-</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Wind Speed at 10 metres</td> <td>AM-2 &amp; AM-4</td> <td>metres per second</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Sigma Theta</td> <td>AM-2 &amp; AM-4</td> <td>-</td> <td>15 minutes</td> <td>Continuous</td> </tr> <tr> <td>Rainfall</td> <td>AM-4</td> <td>millimetres</td> <td>24 hours</td> <td>Continuous</td> </tr> </tbody> </table>	Parameter	Sampling method	Units of measure	Averaging period	Frequency	Temperature at 10 metres	AM-4	degrees Celsius	1 hour	Continuous	Wind Direction at 10 metres	AM-2 & AM-4	-	15 minutes	Continuous	Wind Speed at 10 metres	AM-2 & AM-4	metres per second	15 minutes	Continuous	Sigma Theta	AM-2 & AM-4	-	15 minutes	Continuous	Rainfall	AM-4	millimetres	24 hours	Continuous	Compliant	<p>ONR01-2025 ONR02-2025 ONR03-2025</p>	Monitoring data is collected continuously (recorded at 5 minute intervals) and is available through a web-hosted data portal which presents results at the required averaging periods.
Parameter	Sampling method	Units of measure	Averaging period	Frequency																														
Temperature at 10 metres	AM-4	degrees Celsius	1 hour	Continuous																														
Wind Direction at 10 metres	AM-2 & AM-4	-	15 minutes	Continuous																														
Wind Speed at 10 metres	AM-2 & AM-4	metres per second	15 minutes	Continuous																														
Sigma Theta	AM-2 & AM-4	-	15 minutes	Continuous																														
Rainfall	AM-4	millimetres	24 hours	Continuous																														
<b>M5 Recording of pollution complaints</b>																																		
M5.1	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.	Compliant	<p>Dixon Quarry Group Website HR04-2025 HR05-2025 HR06-2025</p>	A copy of complaints is appended to the Annual Reviews and a summary of the complaints register is provided on the Dixon Quarry Group website.																														
M5.2	<p>The record must include details of the following:</p> <ol style="list-style-type: none"> <li>the date and time of the complaint;</li> <li>the method by which the complaint was made;</li> <li>any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect;</li> <li>the nature of the complaint;</li> <li>the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</li> <li>if no action was taken by the licensee, the reasons why no action was taken.</li> </ol>	Compliant	<p>Dixon Quarry Group Website. HR04-2025 HR05-2025 HR06-2025</p>	A copy of complaints is appended to the Annual Reviews and a summary of the complaints register is provided on the Dixon Quarry Group website. The complaints records include all of the required details (noting that, appropriately, the personal details of the complainant are not published).																														

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Compliant	HR04-2025 HR05-2025 HR06-2025 Dixon Quarry Group website	Records of complaints are contained within both the on-site complaints register as well as Annual Reviews.
M5.4	The record must be produced to any authorised officer of the EPA who asks to see them.	-	-	Noted.
<b>M6 Telephone complaints line</b>				
M6.1	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.	Compliant	Dixon Quarry Group website	Telephone complaints line: (02) 4566 8348 Additional contact details also available on the Dixon Quarry Group website.
M6.2	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.	Compliant	Dixon Quarry Group website <i>Photo E2022C_175</i>	The telephone complaints line is advertised on the Dixon Quarry Group website and displayed on the Site Office wall (adjacent the visitor car paring)
M6.3	The preceding two conditions do not apply until 3 months after the date of the issue of this licence.	-	-	Noted.
<b>6 Reporting Conditions</b>				
<b>R1 Annual return documents</b>				
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 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.	Compliant	HR38-2025 HR39-2025 HR40-2025	Annual Returns for 2022/2023, 2023/2024, and 2024/2025 provided. Electronic copies of each Annual Return were submitted via eConnect Portal during the audit period.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Compliant	HR35-2025 HR36-2025 HR37-2025	Annual Returns were prepared for the 2022/2023, 2023/2024 and 2024/2025 reporting periods and were submitted within 60 days of the end of each reporting period (24 July).
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.	Not Triggered	-	The EPL was not transferred to a new licensee during the audit period.
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.	Not Triggered	-	The EPL was not surrendered or revoked during the audit period.
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').	Compliant	HR35-2025 HR36-2025 HR37-2025	Annual Returns were prepared for the 2022/2023, 2023/2024 and 2024/2025 reporting periods and were submitted within 60 days of the end of each reporting period (24 July).
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.	Compliant	HR118-2022 HR38-2025 HR39-2025 HR40-2025	Annual Returns for 2021/2022, 2022/2023, 2023/2024, and 2024/2025 were available.
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) by a person approved in writing by the EPA to sign on behalf of the licence holder.	Compliant	HR38-2025 HR39-2025 HR40-2025	Submission of Annual Returns via eConnect requires signoff from licence holder or authorised representative.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
	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.	-	-	Noted.
<b>R2 Notification of environmental harm</b>				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Not Triggered	HR04-2025 HR05-2025 HR06-2025 HR59-2025	No incidents causing or threatening material harm to the environment were recorded during the reporting period. It is noted that the reported exceedances of the trigger level in Condition M2.4 were not constituted as threatening environmental harm and were therefore notified in accordance with that condition.
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.	Not Triggered	HR04-2025 HR05-2025 HR06-2025 HR59-2025	No incidents causing or threatening material harm to the environment were recorded during the reporting period
	Note: 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.	Not Triggered	HR04-2025 HR05-2025 HR06-2025 HR59-2025	No incidents causing or threatening material harm to the environment were recorded during the reporting period.
<b>R3 Written report</b>				
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), the authorised officer may request a written report of the event.	Not Triggered	HR04-2025 HR05-2025 HR06-2025 HR59-2025  Advice from Environmental Officer	No requests received.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
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.	Not Triggered	As above	No requests received.
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; f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and g) any other relevant matters.	Not Triggered	As above	No requests received.
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.	Not Triggered	As above	No requests received.
<b>7 General Conditions</b>				
<b>G1 Copy of licence kept at the premises or plant</b>				
G1.1	A copy of this licence must be kept at the premises to which the licence applies.	Compliant	Observation	A hard copy of the EPL was observed at the site office during the site inspection.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	-	-	Noted.
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliant	Observation	A hard copy of the EPL was observed at the site office during the site inspection.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>G2 Other general conditions</b>				
G2.1	A community environment liaison committee must be maintained, comprising representatives of the community and the applicant, that will meet at least every 6 months. Discussion at the meetings must include implementation of the development consent and other statutory approvals, and provide adequate time for the community to raise matters of concern associated with the environmental impacts of the operation, with a view to achieving mutually satisfactory solutions.	Compliant	HR51-2019 HR41-2025 HR42-2025 HR43-2025 HR44-2025 HR45-2025 HR46-2025	Approval from DPE on 1 March 2018 to maintain the existing CCC arrangement.  Meeting minutes for 6 monthly CCC meetings provided.
<b>8 Pollution Studies and Reduction Program</b>				
<b>U1 Air Quality Monitoring</b>				
U1.1	Assessment of Air Quality Monitoring: An assessment of air quality monitoring must be conducted over a minimum 12-month period. This assessment should utilise an appropriate air monitoring method, following either an EPA-published method or Australian Standard with data collected from a variety of sources, which are monitored on a regular basis (the assessment).	Compliant	HR61-2025 HR62-2025 HR63-2025	An Air Quality Assessment was submitted on 12 November 2024 to the EPA. It is noted the assessment includes review of data between 2021 and 2024 but does not include PM <sub>2.5</sub> and TSP as indicated in Condition U1.3. Justification is provided regarding the necessity of this. A response from EPA had not yet been received at the time of this audit.  Whilst compliance has been assessed as being achieved, ultimately EPA will determine acceptance of the proposed approach and assessment provided.
U1.2	Engagement of a Qualified Consultant: The Licensee must engage a suitably qualified consultant (the Consultant) to complete the assessment outlined in Condition U1.1 by (1 month of issuing the Variation Notice).	Compliant	HR68-2025	Umwelt Australia was engaged on 10 October 2024 to complete the assessment.

Table A4-2 (Cont'd)  
Compliance Review – EPL 12513

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
U1.3	<p>Air Quality Monitoring Plan: By (two months of issuing the Variation Notice), the Licensee must submit to the EPA a draft version of an Air Quality Monitoring Plan to the EPA for review (the Plan). The Plan must be prepared by the Consultant and provide a detailed description of the following:</p> <ol style="list-style-type: none"> <li>Identify appropriate ambient air quality monitoring PM<sub>10</sub>, PM<sub>2.5</sub> and TSP (Air Monitoring) at locations within the Premises in accordance with the EPA Ambient Air Monitoring Guidance (January 2022).</li> <li>Location of the Air Monitoring must be suitably representative of the premises activities and selected according to the EPA Ambient Air Monitoring Guidance (January 2022).</li> <li>Continuous meteorological monitoring, including wind data.</li> <li>Dust diaries recording periods of dry and windy conditions and actions undertaken to control dust emissions, including use of site water cart and on-site sprinkler system. The Plan must adequately address and justify any recommendation on the continuation or changes to the current dust monitoring at the Premises and supported by valid data.</li> </ol>	Compliant	HR61-2025 HR62-2025 HR63-2025	A draft Air Quality Monitoring Plan was submitted on 12 November 2024 to the EPA for review. A response from EPA had not yet been received at the time of this audit.
U1.4	<p>Air Quality Monitoring Report: By (fourteen months of issuing the Variation Notice), the Licensee must provide the EPA, via email at <a href="mailto:info@epa.nsw.gov.au">info@epa.nsw.gov.au</a>, with an Air Quality Monitoring Report, prepared by the Consultant that summarises the air quality monitoring conducted over the previous 12 months period (the Report). The Report must:</p> <ol style="list-style-type: none"> <li>analyse and summarise the data including a comprehensive summary of the monitoring undertaken as required outlined in condition U1.3, and</li> <li>adequately addresses and justify any recommendations on the continuation or changes to the dust monitoring at the Premises and supported by valid data.</li> </ol>	<b>Non-Compliant</b>	Advice from Environmental Officer	<p>It is noted that the Air Quality Monitoring Report was required to be submitted by 12 November 2025. Whilst technically non-compliant, submission of the Air Quality Monitoring Report is pending a response the EPA regarding the draft Air Quality Monitoring Plan. It is advised that EPA have been followed up via phone for their response. Therefore, the non-compliance is considered administrative and beyond the control of the Company.</p> <p>It is recommended that EPA be requested to vary the EPL conditions as appropriate to the outcomes of their review of the submitted documentation (<b>Recommendation HR R10/25</b>).</p>

Table A4-3  
Compliance Review – WAL 25941

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>Take of water</b>				
MW08573-00010	<p>A. Water must not be taken under this access licence unless flows in the Cattai Creek Water Source have exceeded the Very Low Flow Class for at least 24 consecutive hours, which means the flow is more than 3 ML/day for a 24-hour period at the Cattai Creek at the Cattai Ridge Road gauge [No. 2122951].</p> <p>B. This restriction does not apply if water is to be taken from a runoff harvesting dam, an in-river dam pool or an off-river pool.</p>	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.
MW8562-00001	<p>The volume of water taken under this access licence during a period of 3 consecutive water years must not be more than the maximum water account debit permitted, which is the sum of the following:</p> <p>A. the water allocations credited to the water allocation account for this access licence from available water determinations made during those 3 water years,</p> <p>B. the amount of water allocations assigned to the water allocation account for this access licence,</p> <p>C. the water allocations recredited to the water allocation account for this access licence.</p>	Compliant	HR65-2025 HR04-2025 HR05-2025 HR06-2025	<p>The annual water take recorded in the logbook is significantly below the allocated volume.</p> <ul style="list-style-type: none"> <li>• 2022/2023 = 0.0ML</li> <li>• 2023/2024 = 3.1ML</li> <li>• 2024/2025 = 2.8ML</li> </ul>
MW8563-00001	<p>A. Water must not be taken under this access licence when there is no visible flow at the location from which water is taken.</p> <p>B. This restriction does not apply if water is taken from an in-river pool, off-river pool, in-river dam pool or a run-off harvesting dam</p>	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.
MW8564-00001	<p>Water must not be taken under this licence from an:</p> <p>A. in-river pool that is below full capacity,</p> <p>B. off-river pool that is below full capacity, or</p> <p>C. in-river dam pool unless the take is not inconsistent with water supply work approval authorising the use of a water supply work for the purpose of taking water from the in-river dam.</p>	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.

Table A4-3 (Cont'd)  
Compliance Review – WAL 25941

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>Monitoring and Recording</b>				
MW8583-00001	A. The access licence holder must record the following information in a logbook for each period of time that water is taken: <ul style="list-style-type: none"> <li>i. date, volume of water taken, start and end time when water was taken, and</li> <li>ii. the access licence number under which the water is taken, and</li> <li>iii. the approval number of the water supply work used to take the water, and</li> <li>iv. the purpose for which water is taken</li> </ul>	Compliant	HR65-2025	The logbook includes the approval number, purpose (being for agricultural irrigation), date, start and end time, and formula for volume calculation. Refer to <b>Improvement HR 110/25</b> .
	B. The access licence holder must record the following information in the logbook at the end of each water year: <ul style="list-style-type: none"> <li>i. the volume of water taken in the water year, and</li> <li>ii. the maximum volume of water permitted to be taken in that water year.</li> </ul>	Compliant	HR65-2025	A logbook has been maintained to record pump run times which are utilised to calculate the volume of water taken.
	C. This requirement does not apply if water is taken through a water supply work that has both an operational: <ul style="list-style-type: none"> <li>i. meter that complies with Australian Standard AS4747 – Meters for non-urban water supply, and</li> <li>ii. data logger.</li> </ul>	Compliant	HR65-2025	It is advised that data loggers are not utilised. An appropriate logbook was sighted.
	D. This condition ceases to apply to this licence on the day on which the mandatory metering equipment condition applies as specified in clause 230(1) in the Water Management (General) Regulation 2018.	Not Determined	-	The mandatory metering equipment condition under the <i>Water Management (General) Regulation 2018</i> does not apply until 1 December 2026 for works within the Greater Metropolitan Region Unregulated Water Sources.  However, it should be noted the 2018 Regulation has been superseded by the <i>Water Management (General) Regulation 2025</i> which does not provide a specific date. Avenues for exemptions are available, and advice should be sought from Water NSW regarding this condition. Refer to <b>Improvement I11/2025</b> .

**Table A4-3 (Cont'd)**  
**Compliance Review – WAL 25941**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
MW6612-00001	A logbook used to record water take information must be retained for five (5) years from the last date recorded in the logbook.	Compliant	HR65-2025 Advice from Environmental Officer	Records have been retained for at least 5 years.
MW8482-00002	A. Before water is taken under this access licence, the access licence holder must confirm that cease to take conditions do not apply and water may be taken.	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.
	B. Where the access licence holder is required to keep a logbook, the access licence holder must record the confirmation, including the way in which the confirmation was established, in a logbook.	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.

**Table A4-4**  
**Compliance Review – WAL 25956**

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
<b>Take of water</b>				
MW8573-00010	<p>A. Water must not be taken under this access licence unless flows in the Cattai Creek Water Source have exceeded the Very Low Flow Class for at least 24 consecutive hours, which means the flow is more than 3 ML/day for a 24-hour period at the Cattai Creek at Cattai Ridge Road gauge [No. 2122951].</p> <p>B. This restriction does not apply if water is taken from a runoff harvesting dam, an in-river dam pool or an off-river pool.</p>	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.
MW8562-00001	<p>The volume of water taken under this access licence during a period of 3 consecutive water years must not be more than the maximum water account debit permitted, which is the sum of the following:</p> <p>A. the water allocations credited to the water allocation account for this access licence from available water determinations made during those 3 water years,</p> <p>B. the amount of water allocations assigned to the water allocation account for this access licence,</p> <p>C. the water allocations recredited to the water allocation account for this access licence.</p>	Compliant	HR66-2025 HR04-2025 HR05-2025 HR06-2025	<p>The annual water take recorded in the logbook is significantly below the allocated volume.</p> <ul style="list-style-type: none"> <li>• 2022/2023 = 6.9ML</li> <li>• 2023/2024 = 5.8ML</li> <li>• 2024/2025 = 28.7ML</li> </ul>
MW8563-00001	<p>A. Water must not be taken under his access licence when there is no visible flow at the location from which water is taken.</p> <p>B. This restriction does not apply if water is taken from an in-river pool, off-river pool, in-river dam pool or a run-off harvesting dam.</p>	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.

Table A4-4 (Cont'd)  
Compliance Review – WAL 25956

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
MW8564-00001	Water must not be taken under this access licence from an: <ul style="list-style-type: none"> <li>A. in-river pool that is below full capacity,</li> <li>B. off-river pool that is below full capacity, or</li> <li>C. in-river dam pool unless the take is not inconsistent with a water supply work approval authorising the use of a water supply work for the purpose of taking water from the in-river dam.</li> </ul>	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.
<b>Monitoring and recording</b>				
MW8583-00001	A. The access licence holder must record the following information in a logbook for each period of time that water is taken: <ul style="list-style-type: none"> <li>i. date, volume of water taken, start and end time when water was taken, and</li> <li>ii. the access licence number under which the water is taken, and</li> <li>iii. the approval number of the water supply work used to take the water, and</li> <li>iv. the purposes for which water is taken.</li> </ul>	Compliant	HR65-2025	The logbook includes the approval number, purpose (being for agricultural irrigation), date, start and end time, and formula for volume calculation. Refer to <b>Improvement HR 110/25</b> .
	B. The access licence holder must record the following information in the logbook at the end of each water year: <ul style="list-style-type: none"> <li>i. the volume of water taken in the water year, and</li> <li>ii. the maximum volume of water permitted to be taken in that water year.</li> </ul>	Compliant	HR66-2025	A logbook has been maintained to record pump run times which are utilised to calculate the volume of water taken.

Table A4-4 (Cont'd)  
Compliance Review – WAL 25956

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
	<p>C. This requirement does not apply if water is taken through a water supply work that has both an operational:</p> <ul style="list-style-type: none"> <li>i. meter that complies with Australia Standard AS 4747 – Meters for non-urban water supply, and</li> <li>ii. data logger.</li> </ul>	Compliant	HR66-2025	It is advised that data loggers are not utilised. An appropriate logbook was sighted.
	D. This condition ceases to apply to this access licence on the day on which the mandatory metering equipment condition applies as specified in clause 230 (1) in the Water Management (General) Regulation 2018.	Not Determined	-	<p>The mandatory meeting equipment condition under the Water Management (General) Regulation 2018 does not apply until 1 December 2026 for works within the Greater Metropolitan Region Unregulated Water Sources.</p> <p>However, it should be noted the 2018 Regulation has been superseded by the Water Management (General) Regulation 2025 which does not provide a specific date. Avenues for exemptions are available, and advice should be sought from Water NSW regarding this condition. Refer to <b>Improvement I11/25</b>.</p>
MW6612-00001	A logbook used to record water take information must be retained for five (5) years from the last date recorded in the logbook.	Compliant	HR66-2025 Advice from Environmental Officer	Records have been retained for at least 5 years.
MW8482-00002	A. Before water is taken under this access licence, the access licence holder must confirm that cease to take conditions do not apply and water may be taken.	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.
	B. Where the access licence holder is required to keep a logbook, the access licence holder must record the confirmation, including the way in which the confirmation was established, in a logbook.	Not Triggered	HR64-2025	Under the <i>Water Management Act 2000</i> , dams on first order watercourses are deemed to be 'runoff harvesting dams'. The flow condition therefore does not apply. Email correspondence with WaterNSW confirms that WAL 25941 (and WAL25956) are attached to a dams on a first order watercourse and flow conditions don't apply.

# Appendix 5

## Site Inspection Photographs

(Total No. of pages including blank pages = 13)



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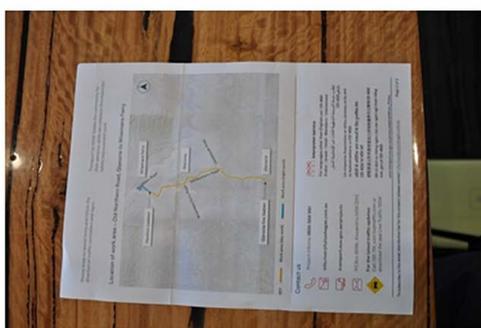
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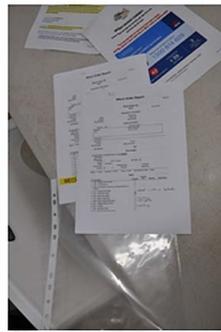
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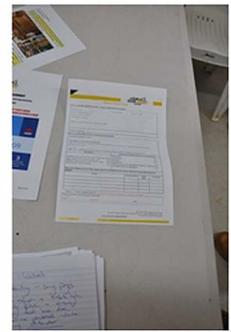
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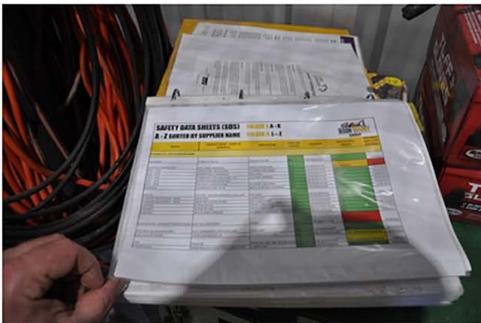
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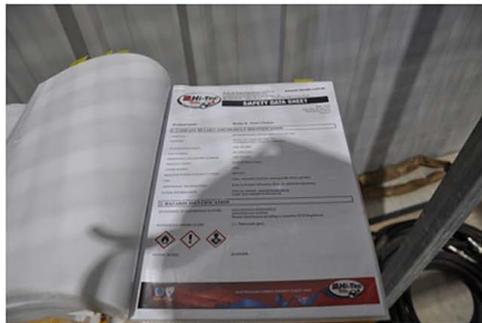
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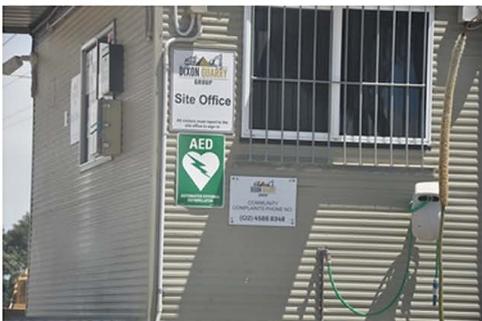
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# Appendix 6

## Status of Implementation of 2022 Audit Response Actions

(Total No. of pages including blank pages = 11)

**Table A6.1**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR R1/22	<p>All disturbed surveyed star posts around the boundaries of the approved extraction areas should be re instated prior to painting (see Recommendation R2).</p> <p><i>A number of star posts were observed to be pushed over, bent or buried around Cells 1A and 1B. These star posts should not have been disturbed and need to be replaced.</i></p>	Non-compliance	<p><b>Proposed Action:</b> The disturbed surveyed star posts will be reinstated.</p> <p><b>Implementation Timeframe:</b> 31 March 2023.</p>	<p>Boundaries of the extraction area were clearly marked during the site inspection, especially within the active Cells 1a to 3b.</p> <p>Prior to commencing earthworks on the eastern side of Stage 1 improvements could be made to increase visibility of boundary markers (see <b>Improvement I2/25</b>).</p>
HR R2/22	<p>All surveyed star posts installed to define the perimeter of the approved extraction area should be painted in a bright colour to alert all Quarry personnel of the location of the boundary.</p> <p><i>The surveyed star posts which are steel grey in colour were observed around Cells 1A and 1B, a number of which had been disturbed during extraction operations. The recommended painting of the posts should assist to clearly define the boundary that should not be disturbed.</i></p>	Non-compliance	<p><b>Proposed Action:</b> The surveyed star posts installed to define the perimeter of the approved extraction area will be painted in a bright colour to improve visibility.</p> <p><b>Implementation Timeframe:</b> 31 March 2023.</p>	<p>Boundaries of the extraction area were clearly marked during the site inspection, especially within the active Cells 1a to 3b.</p> <p>Prior to commencing earthworks on the eastern side of Stage 1 improvements could be made to increase visibility of boundary markers (see <b>Improvement I2/25</b>).</p>
HR R3/22	<p>There should be no disturbances within at least 1m of any surveyed boundary of an approved extraction area in Cell 1A. This requirement should be incorporated in each Job Safety and <u>Environmental</u> Analysis (see <b>Improvement HR I4/22</b>).</p> <p><i>Many of the surveyed star posts were observed to be disturbed/pushed over during the initial activities around the boundary of the approved extraction areas.</i></p>	Non-compliance	<p><b>Proposed Action:</b> See HR I4/22 - The Quarry will include this as a control in the environmental impacts review</p> <p><b>Implementation Timeframe:</b> Immediate – prior to new extraction area</p>	<p>It is noted that extraction is approved to occur up to the edge of the surveyed extraction boundary. No compliance issues were noted during the 2025 audit site inspection.</p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR R4/22	<p>Additional marking in the form of a PVC pole up to 3.5m high (or an alternate system) should be placed above each surveyed boundary star post during the period when land clearing activities are undertaken in close proximity to assist operators of earthmoving equipment to easily observe and ensure that no disturbance occurs within at least 1m of the defined boundary.</p> <p><i>Whilst painted star posts are visible, at ground level, it is important that the boundary is well recognised by earthmoving equipment operators. The additional marking would only need to be in place during the initial establishment of an active extraction area.</i></p>	Non-compliance	<p><b>Proposed Action:</b>                      An additional marker pole up to 3.5m high or alternate system will be placed above each surveyed boundary star post during the period when land clearing activities are undertaken in close proximity to the defined boundary.</p> <p><b>Implementation Timeframe:</b>                      Immediate – future clearing activities</p>	<p>It was advised that appropriate measures were put in place during clearing with no clearing permitted to be undertaken without an internal clearing protocol is followed to ensure clearing is only undertaken within the approved area.</p> <p>Prior to commencing earthworks on the eastern side of Stage 1 improvements could be made to increase visibility of boundary markers (see <b>Improvement HR I2/25</b>).</p>
HR R5/22	<p>The bund wall on the western side of Cell 1A (Photos 10 and 11) should be removed with the material brought back into the adjoining extraction area. The disturbed footprint should be rehabilitated and the boundary star posts (painted) re-instated.</p> <p><i>Recent earthworks on the western side of Cell 1A has resulted in a bund wall approximately 1.5m to 2m high being constructed on its western side just beyond the boundary of Cell 1A. A number of the boundary star posts appear to have been covered during the earthworks.</i></p>	Non-compliance	<p><b>Proposed Action:</b>                      The disturbed area identified on the western side of Cell 1A will be rehabilitated appropriately and the boundary star posts will be re-instated and painted.</p> <p><b>Implementation Timeframe:</b>                      31 March 2023 (pending suitable weather and accessibility to the disturbed area).</p>	<p>This area has been reinstated. <i>Photos E1022C_088 and 089.</i></p>
HR R6/22	<p>All groundwater piezometers on site should be fitted with monuments (with identifying reference numbers) and the deposited dust gauges within the Quarry should be better identified with a painted/engraved/panel displaying the monitoring site reference number.</p> <p><i>Piezometer H2 (Photo 2) was observed to be without a monument and any external identification. Deposited dust gauge D10/EPL 3 (Photo 1) was also not appropriately numbered.</i></p>	Non-compliance	<p><b>Proposed Action:</b>                      The groundwater piezometer monuments on site and deposited dust gauges will be installed with permanent identification tags to display the monitoring site reference number.</p> <p><b>Implementation Timeframe:</b>                      31 March 2023.</p>	<p>All piezometers inspected were fitted with monuments. All monuments and gauges inspected were marked with an identification number. Whilst these were legible, some were fading. A more permanent marking, such as engraving, would be preferable (see <b>Improvement HR I12/25</b>).</p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR R7/22	<p>All employees undertaking pre-start checks for any equipment used on site should be requested to fully and accurately complete the Daily Plant Inspection List. Periodic checks should be undertaken to ensure all lists have been accurately completed.</p> <p><i>Three random examples of Daily Plant Inspection Lists were inspected (51428, 51653 and 51903) and each list was found to contain insufficient or clearly wrong information or insufficient information about which Quarry the equipment was located. Attention to detail on all documentation within the Quarry is fundamental to accurately recording information required regarding quarry operations.</i></p>	Non-compliance	<p><b>Proposed Action:</b></p> <p>Employees will be retrained in the requirements of how to complete the Daily Plant Inspection Lists. Quarry Manager will continue to review the Daily Plant Inspection Lists on a daily basis for the first 2 weeks post training.</p> <p><b>Implementation Timeframe:</b></p> <p>Training will be conducted by 31 January 2023.</p>	<p>The Company advises that retraining was completed. Toolbox records and signature records for new pre-start books (April 2025) sighted</p> <p>Supplied pre-start checklists were fully completed. Spot check of on-site records also indicated all items completed (although a signature was missing on one pre-start sighted)</p>
HR R8/22	<p>All documentation referred to in the Driver's Code of Conduct should be reviewed and updated, where appropriate. These include:</p> <ul style="list-style-type: none"> <li>• the Maroota Local Traffic Management Policy;</li> <li>• the Site Induction for Drivers; and</li> <li>• the Site Traffic Control Plan.</li> </ul> <p>A copy of the Code should be signed by a representative of the Company and the nominated driver, with a copy of the Code and all attachments held by both the Company and the driver. Ideally, re-inductions should occur annually to ensure any adjustments to the Code are brought to the attention of all drivers. Section 4 of the TMP, and the Table of Contents of the TMP, should be updated to correctly identify appendices which form part of the Code.</p> <p><i>The current version of the Site Induction for Drivers is outdated and requires review and improvement. It is important that all drivers sign a copy of the Site Induction and are given a full set of all documents. The importance of annual re inductions cannot be over-emphasised.</i></p>	Non-compliance	<p><b>Proposed Action:</b></p> <p>Documents referred to in the Driver's Code of Conduct will be reviewed and revised appropriately. Annual re-inductions for truck drivers will be undertaken where changes to the TMP or traffic related procedures have occurred. The Traffic Management Plan will be reviewed and revised accordingly.</p> <p><b>Implementation Timeframe:</b></p> <p>The Driver's Code of Conduct and associated documentation will be reviewed and revised by 30 June 2023. The review and revision of the Traffic Management Plan will form part of the review and revision of the Environmental Management Strategy (EMS) and Management Plans post IEA. Timeline to undertake the review and revision will be in accordance with the Consent Condition 5(c) of Schedule 5 that is review the EMS and Management Plans within 3 months of the submission of the IEA and submit the revised documents within 6 weeks of the review notification.</p>	<p>The TMP was last updated in 2024 and includes the latest version of these documents and correct references within Section 4 and the table of contents.</p> <p>The Company advises that reinductions are only undertaken when an update to the Code of Conduct occurs (which has not occurred since the 2022 IEA). However, re-education campaigns are undertaken following the receipt of truck-related complaints.</p> <p>See suggested <b>Improvement HR I2/25.</b></p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR R9/22	<p>The new Clearway software program to be installed for both the Old Northern Road and Haerses Road Quarries in November/December 2022 should ensure that the vehicles entering the Quarry are accounted for in the total traffic counts.</p> <p><i>The current practice to control the total number of trucks entering and leaving the Quarry focusses upon the number of laden trucks departing the Quarry and not those unladen trucks entering the Quarry. It is important that the new software system accounts for both unladen vehicles entering and laden trucks leaving the Quarry.</i></p>	Non-compliance	<p><b>Proposed Action:</b></p> <p>The Clearway software program allows tracking of vehicles entering the quarry to account for the total traffic counts.</p> <p><b>Implementation Timeframe:</b></p> <p>31 January 2023</p> <p>Note that the pilot Clearway software program was launched on 14 December 2022 and Dixon Sand is currently undergoing software testing/fine tuning period.</p>	<p>The ClearWeigh software was operation prior to the 31 January 2023. However, it does not provide for recording of the unladen movement time. Whilst the intent of DA Schedule 3 Condition 26 is to maintain accurate records of all laden movements it also specifies the requirement to record time of arrival and dispatch indicating the time of the unladen movement is also required to be recorded. <b>See Recommendation HR R5/25.</b></p>
HR R10/22	<p>The SDS register for Haerses Road Quarry should be structured to record alphabetically the product type <u>and</u> manufacturer.</p> <p><i>Arrangement of the register by both product type and manufacturer should assist any person to quickly locate the relevant SDS sheet, particularly in the event of an emergency.</i></p>	Non-compliance	<p><b>Proposed Action:</b></p> <p>The SDS register will be reviewed and restructured to make locating SDS easier. It will also be reviewed to rationalise the need for SDS as required under the WHS legislation.</p> <p><b>Implementation Timeframe:</b></p> <p>31 March 2023.</p>	<p>The SDS register now includes alphabetically sorted product and supplier lists.</p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR R11/22	<p>A general Incident Response Checklist should be prepared for the Haerses Road Quarry (similar to the Old Northern Road Quarry) to ensure that all relevant follow up actions, including review of strategies, plans and programs and notification of the review process to relevant authorities, are undertaken within appropriate timeframes in the event of an incident.</p> <p><i>The recommended checklist will be beneficial for all required actions for the Haerses Road Quarry to be undertaken within the required timeframe.</i></p>	Non-compliance	<p><b>Proposed Action:</b></p> <p>The current Incident Response Checklist will be reviewed and revised to manage the relevant follow up actions, reporting and notification timeframes that are required to be undertaken within the appropriate timeframes in the event of an incident.</p> <p><b>Implementation Timeframe:</b></p> <p>The review and revision of the Incident Response Checklist will form part of the review and revision of the Environmental Management Strategy (EMS) and Management Plans post IEA. Timeline to undertake the review and revision will be in accordance with the Consent Condition 5(c) of Schedule 5 that is review the EMS and Management Plans within 3 months of the submission of the IEA and submit the revised documents within 6 weeks of the review notification.</p>	<p>The Company has prepared an Incident Register Form (<i>Document ONR55-2025</i>). The form includes prompts/check boxes for environmental matters and includes a section for recording notifications. The form does not include other follow up actions, such as review of strategies, plans and programs. As an alternative to further updating the form with additional items that would not be relevant to safety incidents, it is suggested that Section 7.5.2 of the EMS be updated to include cross reference to the need to formally review the EMS and associated plans and notify the Department of the review. See <b>Improvement HR I6/25</b> and <b>Recommendation HR R8/25</b>.</p>
HR R12/22	<p>Appropriate water level loggers, or an alternate method of recording, should be installed at each of the on-site quarry dams and any new quarry dams.</p> <p><i>The requirement for water level loggers is documented in Schedule 3 Condition 16(d). Reference to an alternate method of recording is suggested should Dixon Sand identify a more practical and cost effective way to record the information required.</i></p>	Non-compliance	<p><b>Proposed Action:</b></p> <p>Water depth gauge boards will be installed in all onsite quarry related water storage/dams. These do not include agricultural dams which are not utilised for quarry operations.</p> <p><b>Implementation Timeframe:</b></p> <p>30 June 2023.</p>	<p>Water level data loggers have not been installed in on-site dams. See <b>Recommendation HR R4/25</b>.</p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR R13/22	<p>The recently constructed stockpile of soil and related materials on Lots 176 and 177 should be relocated to an area already disturbed within the approved extraction areas – as soon as possible.</p> <p><i>The soil and related materials recently stockpiled on Lots 176 and 177 to depths of up to 2.5m are positioned on naturally occurring topsoil. The stockpiling of this material will cause the deterioration in the viability of the naturally occurring soils beneath the stockpiles. These materials need to be relocated as soon as possible to ensure that the underlying topsoil remains viable for use in future rehabilitation. It is noted that this stockpiling activity is not documented in the Soil and Water Management Plan.</i></p>	Non-compliance	<p><b>Proposed Action:</b> The stockpile of soil and related materials on Lots 176 and 177 will be relocated within the approved extraction areas as soon as possible.</p> <p><b>Implementation Timeframe:</b> Actioned on 10/01/2023 – R13/22 closed out</p>	It is advised that the soil stockpile was relocated. No in appropriate soil stockpiling observed. No mapping of current soil stockpiles was available (see <b>Improvement HR I13/25</b> ).
HR R14/22	<p>The Air Quality Management Plan should be updated to document the sandstone cutting operations to be undertaken within the Quarry.</p> <p><i>The requirements in Schedule 3 Conditions 11(g) and 11(h) to describe the air quality mitigation measures relating to the sandstone cutting operation in the Air Quality Management Plan have not been addressed.</i></p>	Non-compliance	<p><b>Clarification:</b> The AQMP (V1, Nov 2021) addressed the requirements of DA Mod 3 and 4 conditions. This AQMP (V1, Nov 2021) was submitted to DPE for review and approval in November 2021 but Dixon Sand never received any correspondence from the DPE.</p> <p>Conditions 11(g) and 11(h) of Schedule 3 were introduced in Development Consent Modification 5 which was approved in June 2022, issued after the AQMP (V1, Nov 2021) was submitted to DPE.</p> <p>The latest AQMP (V2, Nov 2022) was submitted to DPE for review and approval on 28/11/22 – this document already includes Conditions 11(g) and 11(h) of Schedule 3.</p> <p>During the IEA audit, the draft AQMP (V2, Nov 2022) was sent out to the relevant agencies for consultation, it was not provided to RWC as this was not requested.</p> <p>Therefore, Dixon Sand believes that HR R14/22 does not constitute a non-compliance as the requirements of Conditions 11(g) and 11(h) of Schedule 3 have been fulfilled.</p>	The approved AQMP (January 2024) includes measures targeting sandstone cutting operations.

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
Cont'd			<p><b>Proposed Action:</b> No additional action is required as Conditions 11(g) and 11(h) of Schedule 3 have been included in the current draft of AQMP.</p> <p><b>Implementation Timeframe:</b> Not Applicable.</p>	
HR R15/22	<p>The Noise Management Plan should be updated to document the sandstone cutting operations within the Quarry.</p> <p><i>The requirements in Schedule 3 Condition 8(g) to describe the noise mitigation measures relating to the sandstone cutting operation in the Noise Management Plan have not been addressed.</i></p>	Non-compliance	<p><b>Clarification:</b> The currently approved NMP (V1a, May 2022) addressed the requirements of DA Mod 3 and 4 conditions.</p> <p>Condition 8(g) of Schedule 3 was introduced in Development Consent Modification 5 which was approved in June 2022, issued after the above NMP was approved.</p> <p>The latest NMP (V2, Nov 2022) was submitted to DPE for review and approval on 28/11/22 – this document already includes Condition 8(g).</p> <p>During the IEA audit, the draft NMP (V2, Nov 2022) was sent out to the relevant agencies for consultation, it was not provided to RWC as this was not requested.</p> <p>Therefore, Dixon Sand believes that HR R15/22 does not constitute a non-compliance as the requirement of Condition 8(g) of Schedule 3 has been fulfilled.</p> <p><b>Proposed Action:</b> No additional action is required as Condition 8(g) of Schedule 3 has been included in the current draft of NMP.</p> <p><b>Implementation Timeframe:</b> Not Applicable.</p>	Compliant. Noise management measures, including sandstone cutting operations, are outlined in the NMP.

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR I1/22	<p>Position Statements for all employees should include a list of work tasks that need to be undertaken and the safety and environmental responsibilities / requirements contained in the Development Consent for Quarry to be undertaken as they carry out their work tasks. A copy of the Position Statement should be signed by a company representative and the employee with a copy retained by both parties.</p> <p><i>Current Position Statements simply state the title of the position without documenting the required work tasks and the employee's responsibilities for safety and environmental matters that are specific to their position. Where appropriate, the environmental matters should be cross-referenced to the relevant Development Consent conditions, Management Plan(s) or site-based operational procedures. These matters need to be discussed during an induction with a copy of the entire statement (signed) held by both the Company and new employee.</i></p>	Suggested Improvement	<p><b>Proposed Action:</b></p> <p>The current position statements which form part of the employee and contractor's induction will be reviewed and revised to include appropriate list of work tasks and relevant safety and environmental responsibilities contained in the Development Consent.</p> <p><b>Implementation Timeframe:</b></p> <p>30 June 2023</p>	<p>Two example Position Statements sighted. Additional detail has been added including key work tasks and key responsibilities. Specific reference is made to safety but not to environmental matters. Advised environmental matters addressed through the Employee Handbook and Induction process. The Induction process includes a copy of the Company Environmental Policy, a specific Environmental Induction which summarises the key management measures from the management plans, and a number of other references to environmental requirements.</p>
HR I2/22	<p>All documentation relied upon on site with respect to environmental and other matters should include relevant document control information including the computer file path, date created and review date.</p> <p><i>Most of the documentation sighted during the audit didn't include sufficient document control information to assist in locating the document on the Company's server, whether it is the current version and when it should be reviewed. The progressive introduction of document control will assist in improved management of documentation on site. It is important to clarify differences for documentation for either Old Northern Road Quarry or Haerses Road Quarry.</i></p>	Suggested Improvement	<p><b>Proposed Action:</b></p> <p>The quarry document management system, including document control will be reviewed and necessary improvements made. Note this is a significant task requiring time and resources to fulfil.</p> <p><b>Implementation Timeframe:</b></p> <p>Immediate and ongoing – commence review and revision of new document control system.</p> <p>Timeline may take several years however, Dixon Sand is committed to demonstrate improvement of the system in the next IEA 2025.</p>	<p>Many documents sighted still did not contain this information (for example the updated SDS register, the 2024/2025 WAL logbook). Repeated as <b>Improvement HR I14/25</b>.</p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR I3/22	<p>The Company should introduce a Re-induction Program for all employees and relevant contractors on a regular basis to make each person aware of any changes to the requirements for environmental management practices on site and to re enforce all other requirements.</p> <p><i>Currently there is no Re-induction Program on site with reliance placed upon relevant environmental practices being raised at Toolbox Meetings. Whilst this practice is commendable, a Re-induction Program would provide a more formal approach to ensure that all existing and recently required practices are fully understood by on-site personnel.</i></p>	Suggested Improvement	<p><b>Proposed Action:</b></p> <p>The Quarry will introduce a re-induction program for employees and relevant contractors to communicate changes to the environmental management practices. A re-induction program will be carried out annually.</p> <p>Toolbox talks will continue to provide engaging group discussions around environmental news, incidents and awareness.</p> <p><b>Implementation Timeframe:</b></p> <p>Immediate – reinduction program will be carried out annually, commencing in 2023.</p>	<p>The Company advises that reinductions are only undertaken when a significant change to a system occurs. Rather it is the Company's preference to utilise the detailed toolbox sessions which provide for interactive questions and answers. The suggested improvement from the 2022 EIA is not proposed to be adopted.</p>
HR I4/22	<p>The Company should amend the current practices and documentation involved in the Job Safety Analysis (JSA) to incorporate environmental issues, i.e. to become Job Safety and <u>Environmental</u> Analysis (JSEA). This practice would ensure that for each new task/project undertaken on site that environmental issues are appropriately managed.</p> <p><i>A JSEA would ensure that all relevant environmental issues/documentation is addressed and consolidated in a structured manner before a new task or project is commenced. Issues to be addressed could include completion of a pre-clearance form, notifications to nearby neighbours, pre-operations photography, supply of relevant waste containers for solid/liquid wastes, placement of silt-stop fencing, adequate water for dust controls, are any noise mitigation measures needed?</i></p>	Suggested Improvement	<p><b>Proposed Action:</b></p> <p>The Quarry will undertake an environmental impacts review for new tasks so that potential environmental issues and mitigation measures are identified. Note: this will be undertaken as part of the planning component of the works along with the safety review.</p> <p><b>Implementation Timeframe:</b></p> <p>30 June 2023.</p>	<p>The current Job Hazard Analysis form is dated December 2023 and includes prompts for types of hazards including dust, noise, vibration, erosion and sediment as well as working outside of approved footprint. Examples provided. Whilst environmental aspects appear to still be approached from a safety perspective, consideration is being given.</p>

**Table A6.1 (Cont'd)**  
**Status of Implementation of 2022 Audit Response Actions**

ID	2022 IEA Comments and Recommendations / Suggested Improvements	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
HR 15/22	<p>The locations and identification of all dams and sediments basins within the quarry site should be clarified to ensure all dams and basins are correctly identified.</p> <p><i>The identification and location of all dams and sediment basins will assist in the preparation of all documentation associated with the operation of the quarry and including the records required under Schedule 3 Condition 16(d).</i></p>	Suggested Improvement	<p><b>Proposed Action:</b>                      Identification labels/signs will be installed at each quarry related dam and sediment basin on site.</p> <p><b>Implementation Timeframe:</b>                      30 June 2023.</p>	All dams and sediment basins inspected during the audit were appropriately signed.

# Appendix 7

## Document Reference Table

(Total No. of pages including blank pages = 3)

**Table A7-1  
Principal Audit Documentation Reviewed**

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<b>Ref No.</b>	<b>Document Name and Date</b>
HR25-2019	Dol Response to submission of bore installation and pumping test details.
HR26-2019	Submission of bore installation and pumping test details to Dol.
HR28-2019	Dixon Sands letter to EPA describing EPL application.
HR32-2019	Boundary survey plan submission.
HR34-2019	EMS SWMP NMP BRMP AQMP DPE Submission 20180718
HR35-2019	TMP DPE Submission 20180702
HR36-2019	Bond Lodgement Date with DPE
HR51-2019	Re-appointment of CCC by DPE
HR80-2022	HR Biodiversity and Rehabilitation Management Plan
HR86-2022	HR Bushfire Management Plan Pt 1
HR87-2022	HR Bushfire Management Plan Pt 2
HR101-2022	SWMP Appointment of Experts
HR102-2022	Intersection Upgrade Design
HR103-2022	Intersection Upgrade TMP
HR105-2022	HR BOA Biodiversity Credit Offset Advice
HR106-2022	BRMP (version November 2021) (Unapproved)
HR107-2022	Biodiversity and Rehabilitation Bond Review – BRUM Update
HR108-2022	Biodiversity and Rehabilitation Bond Review – 2019 IEA
HR110-2022	DPIE Notification of EMS Plan Review – MOD 2
HR111-2022	DPIE Notification of EMS Plan Review – 2019 IEA
HR112-2022	DPIE Notification of EMS Plan Review – MOD 3 & 4
HR113-2022	DPIE Notification of EMS Plan Review – MOD 5
HR01-2025	Haerses Road Quarry Modification 6 Modification Report
HR02-2025	Haerses Road Modification 6 Consolidated Conditions of Consent
HR03-2025	HR EPL 12513
HR04-2025	Annual Review 2022/2023
HR05-2025	Annual Review 2023/2024
HR06-2025	Annual Review 2024/2025
HR07-2025	HR EMS
HR08-2025	HR Plan Preparation Checklist and Certification
HR09-2025	HR EPL 12513 & EPBC 2015/7608
HR10-2025	HR PIRMP
HR11-2025	HR EML
HR12-2025	HR AQMP
HR13-2025	HR NMP
HR14-2025	HR SWMP
HR15-2025	HR TMP
HR16-2025	HR Acoustic Bund Construction NMP
HR17-2025	HR Site Condition Checklist
HR18-2025	HR Complaints Register Form
HR19-2025	HR Site Induction for Drivers
HR20-2025	HR Review of Maximum Extraction Depth Map
HR21-2025	Extractive Minerals Return 2022/2023
HR22-2025	Extractive Minerals Return 2023/2024
HR23-2025	Extractive Minerals Return 2024/2025
HR24-2025	Sewerage System Approval

**Table A7-1 (Cont'd)**  
**Principal Audit Documentation Reviewed**

Page 2 of 2

Ref No.	Document Name and Date
HR25-2025	AQMP Submission to DPE (12 January 2024)
HR26-2025	AQMP DPE Approval
HR27-2025	NMP Submission to DPE (12 January 2024)
HR28-2025	NMP DPE Approval
HR29-2025	SWMP DPE Approval
HR30-2025	TMP DPE Approval
HR31-2025	HR BOA Biodiversity Credit Offset Advice 2B
HR32-2025	HR BOA Biodiversity Credit Offset Advice
HR33-2025	HR Haerses Road Biobank Site Management Plan
HR34-2025	HR Porters Road Biobank Site Management Plan
HR35-2025	Annual Return Submission 2022/2023
HR36-2025	Annual Return Submission 2023/2024
HR37-2025	Annual Return Submission 2024/2025
HR38-2025	Annual Return Summary 2022/2023
HR39-2025	Annual Return Summary 2023/2024
HR40-2025	Annual Return Summary 2024/2025
HR41-2025	CCC Meeting Minutes November 2022
HR42-2025	CCC Meeting Minutes May 2023
HR43-2025	CCC Meeting Minutes November 2023
HR44-2025	CCC Meeting Minutes May 2024
HR45-2025	CCC Meeting Minutes November 2024
HR46-2025	CCC Meeting Minutes May 2025
HR47-2025	HR AQ Monitoring Plan EPA Submission
HR48-2025	HR AQ Assessment EPA Submission
HR49-2025	HR AQ Monitoring Assessment response
HR50-2025	WAL25941
HR51-2025	WAL25956
HR52-2025	DPIE Notification of EMS Plan Review – AR21/22
HR53-2025	DPIE Notification of EMS Plan Review – IEA 2022
HR54-2025	DPIE Notification of EMS Plan Review – AR 22/23 & MOD 6
HR55-2025	DPIE Notification of EMS Plan Review – AR23/24
HR56-2025	DPHI Letter 10 April 2024 - Finalisation of Outstanding/Residual Biodiversity Credit Retirement
HR57-2025	Extraction Depth Survey dated 19 June 2025
HR58-2025	Environmental Toolbox Example – May 2025
HR59-2025	Incident Register
HR60-2025	TEOM Alarm Register
HR61-2025	EPL3916 Condition U1 Submission Letter 12 November 2024
HR62-2025	EPL3916 Condition U1 Submission Email 12 November 2024
HR63-2025	EPL3916 Condition U1 Air Monitoring Review and Plan 12 November 2024
HR64-2025	Correspondence from Water NSW dated 22 January 2020 confirming dams located on 1 <sup>st</sup> order watercourses.
HR65-2025	WAL25941 Logbooks & Returns
HR66-2025	WAL25956 Logbooks & Returns
HR67-2025	Morning Truck Arrival and Departure Record sample.
HR68-2025	Umwelt Engagement Evidence for EPL Condition U1.1