



Document Control



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1. Introduction

1.1 Development Approval Requirement

Development approval is required for the construction and use of a road or road related facility. The applicant must commission, commence and pay the full cost of an Independent Environmental Audit of the development. This audit must:

be completed within 3 months of the commencement of the development.

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.*

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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.

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1.2 Background Information

The Roads and Motor Vehicle Regulation Act 2011 (RVR Act) requires the applicant to commission, commence and pay the full cost of an Independent Environmental Audit of the development. The audit must be completed within 3 months of the commencement of the development.

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Independent Environmental Audit: Old Northern Road Report The Roads and Motor Vehicle Regulation Act 2011 (RVR Act) requires the applicant to commission, commence and pay the full cost of an Independent Environmental Audit of the development. The audit must be completed within 3 months of the commencement of the development.

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Table 2: Proposed Action and Implementation Timeframe for the Recommendations arising from Non-Compliances

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
RCR1	1	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.	<p>Proposed Action:</p> <p>Dixon Sand will ensure that all equipment is correctly recorded on the Daily Plant Inspection Lists and that the information is accurate and up-to-date.</p> <p>Implementation Timeframe:</p> <p>3 months</p>
RCR2	1	The current Site Traffic Management Plan contains a range of requirements for truck drivers travelling to and from the Old Northern Road Quarry. Some of the requirements are outdated and no longer relevant This is an important document given it is to be cross-referenced in the Driver's Code of Conduct (see Suggested Improvement ONR I2/22).	<p>Proposed Action:</p> <p>The Driver's Code of Conduct will be reviewed and revised accordingly.</p> <p>Implementation Timeframe:</p> <p>3 months</p>
RCR3	3	The current Site Traffic Management Plan contains a range of requirements for truck drivers travelling to and from the Old Northern Road Quarry. Some of the requirements are outdated and no longer relevant This is an important document given it is to be cross-referenced in the Driver's Code of Conduct (see Suggested Improvement ONR I2/22).	<p>Proposed Action:</p> <p>The Driver's Code of Conduct will be reviewed and revised accordingly.</p> <p>Implementation Timeframe:</p> <p>3 months</p>

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ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
			<p>3</p> <p></p>
<p>RR</p> <p>R</p>		<p>The monument on Monitoring Well MW2 on the eastern side of Lot 1 DP 547255 was observed to be without any external identification.</p>	<p>Proposed Action:</p> <p>Identify and mark the monument on Monitoring Well MW2 on the eastern side of Lot 1 DP 547255 with a permanent marker.</p> <p>Implementation Timeframe:</p> <p>3 months</p>
<p>RR</p> <p>R</p>		<p>Uncertainty existed on site during the audit site inspection regarding how various products were filed within the register. Arrangement of the register by both product type and manufacturer should assist any person to quickly locate the relevant information.</p>	<p>Proposed Action:</p> <p>Reorganize the register by both product type and manufacturer to assist in locating relevant information.</p> <p>Implementation Timeframe:</p> <p>3 months</p>
<p>RR</p> <p>R</p>	<p>3</p> <p></p>	<p>This modified procedure is recommended in response to the measured noise exceedances recorded in December 2019 and June 2021. Gaining an appreciation of the implications upon the total noise generated prior to the introduction of the new equipment or procedures would assist to identify if additional controls are needed or the use of certain equipment needs to be modified.</p>	<p>Proposed Action:</p> <p>Implement noise control measures to reduce noise levels.</p> <p>Implementation Timeframe:</p> <p>3 months</p>

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ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
		<i>The reported uncontrolled discharge of water at Monitoring Point 1 on 16 June 2020 did not include any water quality data, which is a requirement of the EPA</i>	<p>Implementation Timeframe:</p>
<p>RR</p>		<p><i>Not all affected landowners were notified regarding the results of noise</i></p>	<p>Proposed Action:</p> <p>Implementation Timeframe:</p>

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Table 3 Response, Proposed Action and Implementation Timeframe for the Suggested Improvements

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
1.1.1	<p>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.</p>	<p>Proposed Action:</p> <p>Update the position statements to include specific work tasks and responsibilities for safety and environmental matters. These matters will be cross-referenced to the relevant Development Consent conditions, Management Plan(s) or site-based operational procedures. The updated statements will be discussed during an induction with a copy of the entire statement (signed) held by both the Company and new employee.</p> <p>Implementation Timeframe:</p> <p>3 months</p>
1.1.2	<p>Documentation referred to in the Driver's Code of Conduct should be:</p> <ul style="list-style-type: none"> the Maroota Local Traffic Management Policy; the Site Induction for Drivers; and the Site Traffic Control Plan. <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. 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.</p>	<p>Proposed Action:</p> <p>Documents referred to in the Driver's Code of Conduct will be reviewed and updated.</p> <p>The Driver's Code of Conduct and associated documentation will be reviewed and updated.</p> <p>Implementation Timeframe:</p> <p>The Driver's Code of Conduct and associated documentation will be reviewed and updated within 3 months.</p>

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
00R03	<p>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.</p>	<p>Proposed Action:</p> <p>Document control system to be implemented to ensure all documentation is controlled and versioned. This will include a process for identifying, controlling, and updating documents, and ensuring that the correct version is used on site.</p> <p>Implementation Timeframe:</p> <p>Document control system to be implemented by 30/06/2024. A process for identifying, controlling, and updating documents will be implemented by 30/06/2024.</p>
00R00000	<p>The current Monthly Site Condition Check List should be reviewed to ensure it captures all key operational management commitments documented in the Quarry's Development Consent, Environment Protection Licence and Management Plans.</p> <p>The current Monthly Site Condition Check List appears comprehensive – not withstanding this, it is preferable that all commitments for the Quarry are captured. It is noted that not all commitments would need to be assessment monthly.</p>	<p>Proposed Action:</p> <p>The Monthly Site Condition Check List will be reviewed to ensure it captures all key operational management commitments documented in the Quarry's Development Consent, Environment Protection Licence and Management Plans.</p> <p>Implementation Timeframe:</p> <p>The Monthly Site Condition Check List will be reviewed by 30/06/2024. A process for identifying, controlling, and updating documents will be implemented by 30/06/2024.</p>
00R00000	<p>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.</p>	<p>Proposed Action:</p> <p>A Re-induction Program will be implemented to ensure that all existing and recently required practices are fully understood by on-site personnel.</p> <p>Implementation Timeframe:</p> <p>A Re-induction Program will be implemented by 30/06/2024.</p>

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ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
		<p>3 months from completion of the remediation work.</p>
1.1.1	<p>The JSEA should be updated to include the following issues/documentation:</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 preclearance 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 or notifications to adjoining landowners?</i></p>	<p>Proposed Action:</p> <p>The JSEA should be updated to include the following issues/documentation:</p> <p>Implementation Timeframe:</p> <p>3 months from completion of the remediation work.</p>
1.1.2	<p>All publicly available documents placed on the Company's website should include direct links to the documents.</p> <p><i>At present, all documents placed on the Company's website do not include the requested direct links which makes reviewing documents/search for information more difficult.</i></p>	<p>Proposed Action:</p> <p>The JSEA should be updated to include the following issues/documentation:</p> <p>Implementation Timeframe:</p> <p>3 months from completion of the remediation work.</p>

