

Old Northern Road Quarry

Response and Action Plan for the 2025 Independent Environmental Audit

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General Description	This document contains the proposed action and implementation timeframe in response to the recommendations and suggested improvements contained in the 2025 Independent Environmental Audit Report for the Old Northern Road Quarry
Authorised by:	David Dixon (Director)

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DRAFT	03/02/2026	Draft for internal distribution	Hunny Churcher (Env Officer)	David Dixon Jamie Baker Mick Munnoch
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ABBREVIATIONS

AQMP	Air Quality Management Plan
BRMP	Biodiversity and Rehabilitation Management Plan
DA250-09-01	Development Consent DA250-09-01 (Modification 5) for the Old Northern Road Quarry
Dixon Sand	Dixon Sand Pty Ltd, formerly Dixon Sand (Penrith) Pty Ltd
DPHI	Department of Planning, Housing and Infrastructure (formerly DPIE and DPE)
EMS	Environmental Management Strategy
EPA	NSW Environment Protection Authority
EPL 3916	Environment Protection Licence 3916 for the Old Northern Road Quarry
IEA	2025 Independent Environmental Audit
RWC	R.W. Corkery and Co Pty Ltd
TMP	Traffic Management Plan
WAL	Water Access Licence

1. Introduction

1.1. Development Approval Requirement

Dixon Sand Pty Ltd (Dixon Sand) operates the Old Northern Road Quarry located in Maroota, New South Wales under the Development Consent DA 250-09-01 (Modification 5).

Condition 13 of Schedule 5 of DA 250-09-01 requires:

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.*

Condition 14 of Schedule 5 of DA 250-09-01 requires:

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.

1.2. Background

The appointment of R.W. Corkery and Co Pty Ltd (RWC) to carry out the 2025 Independent Environmental Audit (IEA) for Dixon Sand as per the abovementioned consent conditions was approved by the Department of Planning, Housing and Infrastructure (DPHI) on 7 April 2025 and 23 October 2025.

This IEA covers an audit period between 19 October 2022 and 13 November 2025. The *Independent Environmental Audit: Old Northern Road Report* (RW Corkery & Co, February 2026, Document No. 1021/03) which contains the findings, recommendation to address non-compliances and suggested improvements was issued to Dixon Sand on 2 February 2026.

1.3. Objectives

The *Old Northern Road Quarry – Response and Action Plan for the 2025 Independent Environmental Audit*, (this Document) has been prepared to address the requirement of Condition 14 of Schedule 5 of DA 250-09-01. This Document outlines Dixon Sand's response and proposed actions to address the IEA findings, recommendations for non-compliances and suggested improvements as identified in *the Independent Environmental Audit: Old Northern Road Report* (RW Corkery & Co, February 2026, Document No. 1021/03). This Document has been prepared in accordance with the *Independent Audit – Post Approval Requirements May 2020* (Department of Planning, Industry and Environment, 2020).

2. Independent Environmental Audit Finding

2.1. IEA Finding Summary

Table 1 outlines the status of compliance against the conditional components of Development Approval 250-09-01, Environment Protection Licence (EPL) 3916, and Water Access Licence (WAL) 24341.

Table 1: Compliance Status for the Development Consent and Licences.

Approval	DA 250-09-01	EPL 3916	WAL 24341
Compliant	184	44	2
Non-Compliant	6	1	0
Not Triggered	25	14	8
Not Determined	3	0	0
Total	218	54	10

2.2. Response and Proposed Actions for Compliance based Recommendations

A total of 7 compliance-based recommendations were provided by the IEA. The proposed actions and implementation timeframe for the recommendations arising from non-compliances are outlined in Table 2.

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
ONR R1/25	Sch 3 Cond 16(d)	The survey marker on the northern wall of the extraction area within Lot 1 (or suitable alternative) should be reinstated to ensure that the process for ensuring approved extraction depth is not exceeded. <i>It is advised that the previously established marker was removed during works to establish Silt Pond No. 6. This survey marker forms part of the approved monitoring program (Section 5.2.2.1 of the SWMP) to ensure extraction does not exceed the extraction limits and is therefore required to be reinstated to enable continued implementation of the SWMP.</i>	Proposed Action: A new survey marker will be installed to replace the old survey marker Implementation Timeframe: Actioned on 27 January 2026.
ONR R2/25	Sch 3 Cond 16(d)	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. <i>Whilst a process is in place (Section 5.2.2.1 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.</i> <i>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.</i>	Proposed Action: Surveys of the completed extraction depth to be overlain over the maximum extraction depth map. Implementation Timeframe: At the completion of each extraction stage / areas
ONR R3/25	EPL Condition U1.4	The EPA should be requested to vary the conditions of EPL 3916 to update special Condition U1 regarding the air quality	Proposed Action:

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
		monitoring and assessment to reflect the agreed actions and update implementation timeframes as appropriate. (see also Improvement ONR 17/25). <i>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.</i>	Request an EPA EPL variation to remove/amend the condition wording to reflect the correct timing stipulated by the condition. Discussion with the EPA will confirm the appropriate condition wording. Implementation Timeframe: At the conclusion of the air quality impact assessment required under Condition U1, or as initiated at the next EPL variation.
ONR R4/25	Sch 3 Cond 21	DPHI should be consulted to confirm the requirement to record the unladen truck movement entry/exit times and, if required, an appropriate system implemented. <i>The current ClearWeigh system provides 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 21 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.</i>	Proposed Action: DPHI will be contacted to confirm the requirement to record unladen truck movement entry/exit times. Implementation Timeframe: Contact DPHI by 28 February 2026
ONR R5/25	Sch 3 Cond 25(c)	Continue to follow up with the DPHI to ensure that the Positive Public Covenant to provide long-term security of the Haerses Road Biodiversity Offset Area is fully processed to enable it to be implemented.	Proposed Action: Contact DPHI to follow up on the status of their review. Implementation Timeframe:

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
		<i>Dixon Sand has submitted all required information regarding the Positive Public Covenant to DPHI and awaits the Department's response in order for this matter to be finalised.</i>	Contact DPHI by 28 February 2026
ONR R6/25	Sch 5 Cond 5(a)	The Department should be formally notified of all reviews of the Environmental Management Strategy and associated management plans in accordance with DA <i>Schedule 5 Condition 5</i>. <i>A total of 29 'incident' reports were submitted during the audit period. Review of the plans was formally submitted on one occasion (in conjunction with the review triggered by the Annual Review). Incident reports from 11 June 2024 onwards also 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.</i> <i>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.</i>	Proposed Action: Notify DPHI that a review of the EMS and management plans have been reviewed following an incident. If any revision is required, ensure the revised document(s) is submitted within the required timeframe. Implementation Timeframe: From 4 February 2026 onwards (date in which this response is submitted to DPHI)
ONR R7/25	Sch 5 Cond 9	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. <i>During the audit period a total of 29 'incident' reports were submitted 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</i>	Proposed Action: Notify DPHI of an incident immediately upon becoming aware of the incident. Record and include the date the incident was made aware of in the submission of the incident report. Implementation Timeframe: From 4 February 2026 onwards (date in which this response is submitted to DPHI)

ID	Consent Condition(s) relevant to Non-Compliance	IEA Comments and Recommended Action	Proposed Action and Implementation Timeframe by Dixon Sand
		<i>day as becoming aware of the exceedance</i> this does not technically meet the requirement to immediately notify.	

2.3. Response and Proposed Actions for Suggested Improvements

A total of 18 suggested improvements were provided by the IEA. The response, proposed actions and implementation timeframe for the suggested improvements are contained in Table 3.

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
ONR I1/25	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. <i>Whilst issues with sediments on Old Northern Road appear to be principally a result of the build-up of materials on the road shoulders which is to be addressed through TfNSW maintenance, minor tracking / deposition was observed on the northern (exit) side of the access road indicating the source is from Quarry activities (Photos E1021C_100, 101, 103 to 106).</i>	Proposed Action: The quarry will endeavour to ensure measures are undertaken to reduce tracking / visible deposition of fines on the Quarry access road and intersection, as reasonably practicable. Please note the Quarry access road traverses through active farmland which occupy both sides of the road which generate dust and contribute to dust settlement on the Quarry access road. Implementation Timeframe: From 4 February 2026 onwards (date in which this response is submitted to DPHI)
ONR I2/25	The dust diary, recording actions during dry and windy conditions, should be implemented as soon as practicable. <i>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.</i>	Proposed Action: Dust diary will be utilised to record adverse weather especially during dry and windy conditions, together with any modifications of quarry operations prior to or as a result of the adverse weather condition. Implementation Timeframe: From 4 February 2026 onwards (date in which this response is submitted to DPHI)

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
ONR I3/25	A survey should be undertaken at completion (or completion of sections) of the 5m bunding within Lots 1 and 2 to confirm the final bund height meets the requirement. <i>Construction of the bunding on the eastern extent of Lots 1 and 2 commenced during the audit period. Whilst it appears to be compliant this should be confirmed through measurement.</i>	Proposed Action: Survey will be undertaken at the completion of the bund to confirm the height requirement. Implementation Timeframe: At the completion of the bund construction.
ONR I4/25	The Noise Management Plan should be updated to include management measures for the introduction of new and potentially noisy items of equipment or undertaking new tasks where operating circumstances are different to those previously encountered. Measures should include review of the sound power level (either supplied by the manufacturer or measured on-site) and, where appropriate, testing of equipment / operational circumstances within a shielded location or at a time when all other equipment is not operating. <i>These measures were previously recommended in response to measured noise exceedances recorded in December 2019 and June 2021. Whilst introduction of new items of equipment or processes is not a common practice, inclusion of relevant measures within the NMP will act as a prompt in the future should this occur.</i>	Proposed Action: Update the Noise Management (and any relevant internal protocol) to include a procedure to review the noise specifications of any new equipment against the Maximum operating sound power level. Implementation Timeframe: Post IEA - review of the EMS and Management plan.
ONR I5/25	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. <i>The current EMS and management plans principally include figures with aerial photography dated 2016. Whilst not required for compliance, as a management tool it is helpful to see approved</i>	Proposed Action: Figures to be updated in the next review and revision of the EMS and relevant management plans. Implementation Timeframe: Post IEA - review of the EMS and Management plan.

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
	<i>boundaries and monitoring locations etc in the context of the current site status.</i>	
ONR I6/25	During the next period of bund construction, consideration should be given spreading of topsoil material over all parts of the completed bund that have not yet revegetated. Alternatively, spreading of appropriate seed, mulch/cuttings may be undertaken. <i>It was advised that the new bunding on the eastern limit of extraction within Lot 1 and 2 will self-seed from the adjacent vegetation. Whilst there is some evidence of self-seeding this remains limited despite a substantial period of time since formation (Photos E1021C_030 and 031).</i>	Proposed Action: At the next bund construction phase, appropriate cover crop seeds to be spread where it is deemed safe to undertake seed spreading operation. There may be areas that are deemed unsafe due to the location and height of the bund, relative to the extraction pit face. Implementation Timeframe: During the next bund construction phase
ONR I7/25	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 3916 Condition U1. If required, EPA should be requested to reference the AQMP required by DA 250-09-01 rather than requiring a separate document be prepared for ongoing management / monitoring. <i>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 250-09-01 are required to be undertaken in consultation with EPA and therefore this should be a streamlined process.</i>	Proposed Action: The AQMP will be updated following the outcome of the review of the Air Quality Monitoring Program by EPA Implementation Timeframe: Post review of Air Quality Monitoring Program by EPA

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
ONR I8/25	All monuments above the groundwater piezometers should be identified with a more permanent reference to the monitoring number. <i>Whilst all monuments inspected during the audit were observed to be labelled, some were labelled with felt pen, some of which were fading/wearing. A more permanent marking, such as engraving as per MW2, would be preferable.</i>	Proposed Action: A more permanent labelling system will be implemented Implementation Timeframe: 30 June 2026
ONR I9/25	The permitting requirements for relocating aquatic fauna and turtles from the onsite dams should be reflected in the appropriate documentation and Section 5.1.1 of the SWMP updated to cross reference this documentation. For example, this could be achieved through updating the pre-clearance protocols within the Biodiversity and Rehabilitation Management Plan. <i>The Company has appropriately consulted with DPI Fisheries to confirm the permitting requirements under the Fisheries Management Act 1994. To ensure that compliance is achieved in the future these requirements should be reflected in the appropriate documentation.</i>	Proposed Action: Section 5.1.1 of the SWMP will be updated to reflect the appropriate permitting requirements for relocating aquatic fauna and turtles, and include the outcome of the correspondence with DPHI Fisheries. A new procedure will be included in the Pre-clearance Permit to ensure consideration is given to the specific requirements when Quarry operation is impacting on dams and aquatic fauna. Implementation Timeframe: At the next review and revision of the EMS and Management Plans
ONR I10/25	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. <i>Whilst the 2020 Monthly Site Condition Check List (forming part of the current EMS and provided on the Dixon Sand website) was updated 22 June 2023 the items and wording in the updated checklist remain the same as per the 2020 checklist.</i>	Proposed Action: A review will be undertaken on the current effectiveness of the Monthly Site Checklist including potentially separating field-based versus a desktop-based. This may be incorporated into other internal system. Implementation Timeframe: 30 June 2026.

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
	<i>Whilst the checklist 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.</i>	
ONR I11/25	All documentation referred to in the Driver's Code of Conduct should be reviewed and updated, where appropriate. These include: • the Maroota Local Traffic Management Policy; • the Site Induction for Drivers; and • the Site Traffic Control Plan. Section 4 of the TMP, and the Table of Contents of the TMP, should also be updated to correctly identify appendices which form part of the Code and Section 5 updated to reflect the process for reinductions (and the records to be retained). 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. <i>The TMP has not been updated since the 2022 Independent Environmental Audit recommended improvement for review and</i>	Proposed Action: The Driver's Code of Conduct forms part of both the TMP and Truck Driver Induction Package. A review of the Driver's Code of Conduct will be undertaken. Any changes will require a re-induction for Truck Drivers. Note it is company policy that if the Driver's Code of Conduct has not changed following a review then a re-induction is not required. Implementation Timeframe: 31 December 2026

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
	<i>update. It is important that all drivers sign a copy of the Site Induction and are given a full set of all documents.</i>	
ONR I12/25	The Biodiversity and Rehabilitation Management Plan should be reviewed and updated as required, in particular Section 7.1 which outlines the management measures to be implemented over the next 3 years. Where these measures remain consistent for the next 3 years this should be noted in the formal management plan review correspondence with DPHI. <i>The currently approved BRMP is dated 2020. Whilst the key rehabilitation and management measures specified in Section 7.2 appear to be generally appropriate they do not reflect the current area of operations and should be reviewed and updated as necessary. This would include items such as placement of topsoil on the 250m buffer bund (see Improvement ONR I6/25).</i>	Proposed Action: BRMP will be reviewed and Section 7.1 updated Implementation Timeframe: At the next review and revision of the EMS and Management Plans
ONR I13/25	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. <i>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.</i>	Proposed Action: A review of the EMS will be undertaken and may include a procedure to review the EMS and management plans following an incident report OR a separate checklist/protocol will be developed to ensure compliance. Implementation Timeframe: At the next review and revision of the EMS and Management Plans
ONR I14/25	Areas with equipment containing hydrocarbons / hydrocarbon residues should be inspected as part of the monthly site inspection	Proposed Action:

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
	checklist and any hydrocarbon staining cleaned up and material appropriately disposed of. <i>Several areas of minor hydrocarbon staining were observed on unsealed surfaces. These appeared to be the result of rain washing hydrocarbons off stored equipment (Photos E1021C_059, 068).</i>	Monthly Site Checklist to be updated to include inspection, cleanup and disposal. Implementation Timeframe: 30 June 2026.
ONR I15/25	Where reporting is undertaken against the EPL PM10 criteria of 42µg/m³ this should be compared to the rolling 24hr average PM10 in accordance with Condition M2.4. <i>The CBased monitoring reports appended to the Annual Review appear to report against daily PM10 results rather than rolling 24-hour average PM10 results. This has resulted in reporting of compliance with the criteria when it was actually exceeded.</i>	Proposed Action: Contact CBased and amend the PM10 reporting variables to ensure compliance. Implementation Timeframe: 30 June 2026.
ONR I16/25	CBased should be requested to include additional tabs in the monthly monitoring data summary spread sheet which include: • each 15 minute PM10 result; and • each rolling 24-hour average PM10 results (each 15 minutes). Tabs including the meteorological data averaged at the time intervals outlined in EPL Condition M2.4 should also be preferentially provided so that the Company does not need to generate these for compliance. <i>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</i>	Proposed Action: Contact CBased and amend the PM10 reporting variables to ensure compliance. Implementation Timeframe: 30 June 2026.

ID	IEA Comments and Suggested Improvement	Proposed Action and Implementation Timeframe by Dixon Sand
	<i>compliance, however, data is not provided to the Company in the format / with averaging periods required by EPL 3916.</i>	
ONR I17/25	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. <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>	Proposed Action: The Quarry actively takes measures to improve its quality management system as far as reasonably practicable. Implementation Timeframe: Ongoing
ONR I18/25	Consideration should be given to providing a monthly update of all environmental monitoring data collected (for that month) in accordance the management plans approved for DA 250-09-01. <i>Currently PM10 data is provided on a monthly basis, however, other data is only provided / summarised annually within the Annual Review. Whilst DA Condition 5(15) does not specify the period that monitoring summaries must be provided, it is considered best practice to make relevant results available at suitable intervals (e.g. monthly).</i>	Proposed Action: Contact CBased and amend the PM10 reporting variables to ensure compliance. Implementation Timeframe: 30 June 2026.

3. Progress Reporting

The progress of the proposed actions to address the recommendations and suggested improvements contained within this document will be reported in the Annual Reviews.

APPENDIX A

Old Northern Road Quarry - 2025 Independent Environmental Audit Report (1021/03)



Dixon Sand Pty Ltd
ABN: 80 002 278 686



Independent Environmental Audit

of the

Old Northern Road Quarry

for the period

19 October 2022 to
13 November 2025

Prepared by:



RWCorkery&co

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.





Dixon Sand Pty Ltd
ABN: 80 002 278 686

Independent Environmental Audit

of the

Old Northern Road Quarry

for the period

19 October 2022 to 13 November 2025

Prepared for:

Dixon Sand Pty Ltd
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Executive Summary

This audit report has been prepared in accordance with *Schedule 5, Condition 13* of DA 250-09-01 for the Old Northern 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 250-09-01, Environment Protection Licence 3916, and Water Access Licence 24341 was assessed as follows.

Approval	DA 250-09-01	EPL 3916	WAL 24341
Compliant	184	44	2
Non-Compliant	6	1	0
Not Triggered	25	14	8
Not Determined	3	0	0
Total	218	59	10

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

- the need to reinstate a survey marker utilised in managing the depth of extraction;
- absence of records for truck arrival times (when unladed, with records held for laden departure times);
- the need to follow up DPHI and finalise the Public Positive Covenant to provide long-term security for the biodiversity offset area;
- not formally reviewing management plans (and notifying the Department of the review) following submission of incident reports (even though the incident reports confirmed 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
- finalising the Air Quality Monitoring Report required by EPL 3916 once a response is received by EPA.

Management Plans

A high-level review of the various strategies, plans and programs required by DA 250-09-01 was undertaken. The plans were considered to meet the respective conditional requirements of DA 250-09-01 although a range of recommendations and suggested improvements have been made.

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 seven (7) 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 Old Northern Road Quarry (“ONR Quarry”) (**Figure 1**) and an associated quarry, Haerses Road Quarry (“HR Quarry”), in Maroota, NSW, approximately 40km north of Parramatta. Component areas for the ONR Quarry are generally referenced by the relevant land parcels within the Quarry Site, namely Lots 29 and 196 DP 752025 and Lots 1 and 2 DP 547255. Notably, Lot 196 DP 1288211 has been reclassified as Lot 1 DP1288211. As the majority of current documentation, including the Development Consent, refer to Lot 196 this audit report also continues to refer to Lot 196.

Extraction commenced within Lots 29 and 196 in the early 1980s, with the Company undertaking extraction from 1992 to December 1998. Development consent for ongoing extraction within Lots 29 and 196 was granted by the NSW Land and Environment Court on 7 July 2000 with subsequent modification applications being lodged and providing for extraction within Lots 1 and 2. During the audit period extraction operations occurred within Lots 196, 1 and 2, with materials principally processed, stockpiled and dispatched within Lot 196.

Unprocessed sand was also transferred from the HR Quarry to the ONR Quarry for processing and subsequent dispatch throughout the audit period. Silts from the washing of materials extracted from both quarries are retained in engineered structures within former extraction areas on site which are, in turn, incorporated progressively to form the approved final landform. During the audit period one silt pond in the southeast corner of Lot 196 and three silt ponds incorporating the majority of Lot 29 were capped / in the process of being capped and left to settle/compact prior to rehabilitation. As such, whilst rehabilitation has commenced, final landform creation and rehabilitation largely remain ongoing.

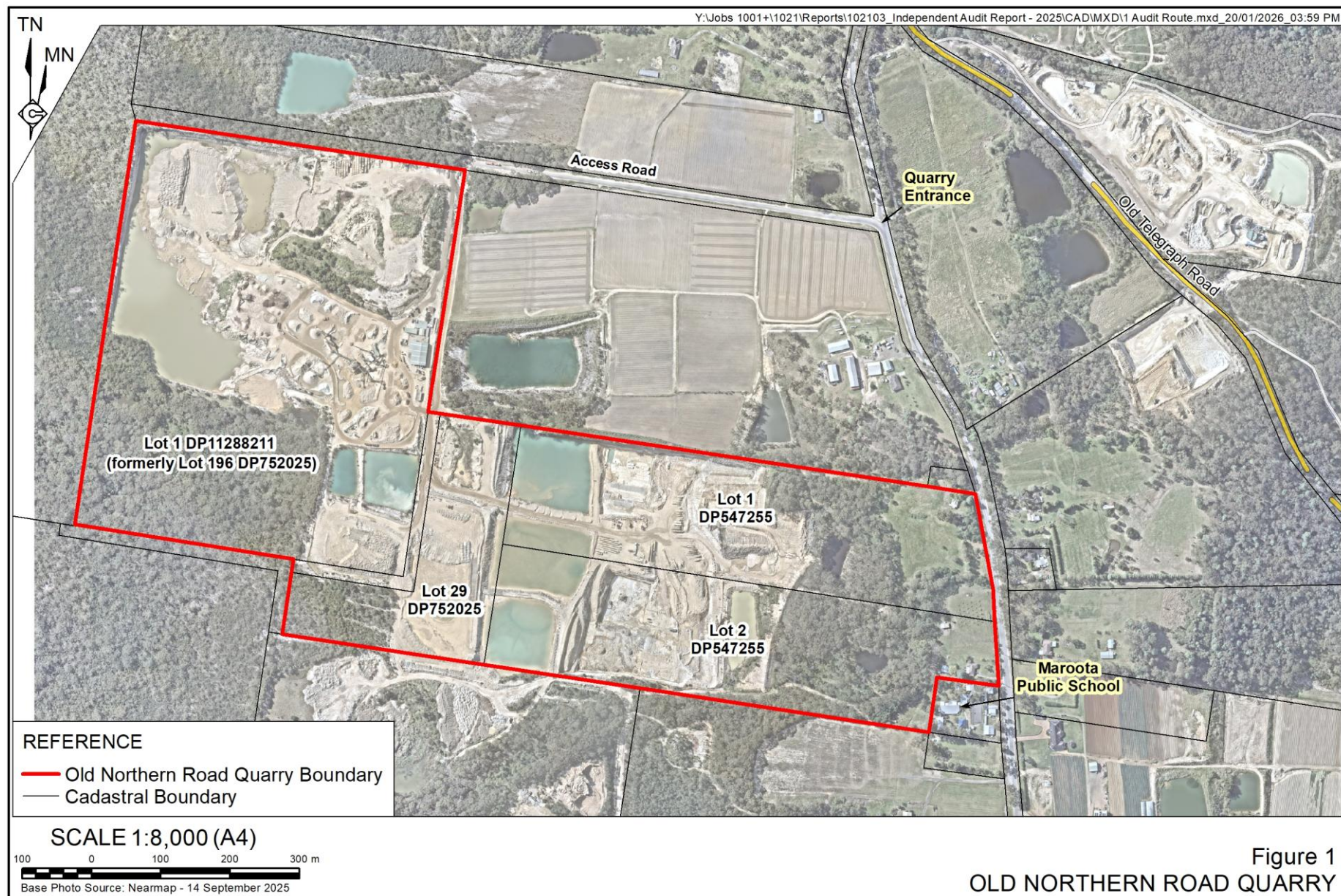
1.2 Scope and Audit Objectives

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

This audit has been prepared for Dixon Sand Pty Ltd (“the Company”) in accordance with *Schedule 5, Condition 13* of DA 250-09-01 for the Old Northern 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 250-09-01, this audit has been prepared generally in accordance with the requirements of the 2020 *Independent Audit Post Approval Requirements*.

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 Company's HR Quarry. Details of the HR Quarry audit are provided in a separate report (Ref: 1022/03) with this audit report confined to operations associated with the ONR Quarry and associated Development Consent 250-09-01, Environment Protection Licence 3916 and Water Access Licence 24341.

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 250-09-01 DA 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 ONR Quarry covered 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 ONR 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 inspections. 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 250-09-01 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.

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 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. 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. Dixon Sand has not received any new or modified Development Approvals for ONR since the 2022 audit.

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**. It is noted that the issues raised in **Table 2.2** relate to either or both the ONR Quarry or HR Quarry.

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	- The Independent Environmental Audit for the development to be undertaken in accordance with Schedule 5, Condition 13 and 14 of the consent. - It is recommended that the IEA be undertaken in accordance with the <i>Independent Audit Post Approval Requirements</i> 2020. - Ensure any issues with the dust deposition gauges are addressed.	<i>Sections 1.2 and 2.1</i> <i>Sections 1.2 and 2.1</i> <i>Sections 3.1.3, 3.1.4, and 3.3.2.3.</i>
NSW EPA	- The EPA has no specific comments on the scope of the audit. - 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.	-
Department of Climate Change, Energy, the Environment and Water (DCCEEW) – Water Group	The audit to address compliance with: - Water Management Plans and related sub-plans, Site Water Balance, Erosion and Sediment Control Plan, Stormwater Management Plan, Surface Water and Groundwater Management Plan; - Extraction Plans and related sub-plans, Water Management Plan and Subsidence Management Plan; - Trigger action response plans for water source impacts which set clearly defined limits and actions and 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 authorised; - Water metering at the site, 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; and - 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.	Appendix 4, <i>Section 3.3.2.4</i> <i>Not Applicable.</i> <i>Sections 3.1.3, 3.1.4, and 3.3.2.4</i> <i>Section 3.3.2.4</i> <i>Section 3.3.2.4</i> Appendix 4 <i>Section 3.2.1</i> <i>Section 3.3.2.4</i>
Transport for NSW	That the audit addresses the operation of the quarries against the relevant traffic management plans / operation plans.	<i>Section 3.3.2.5</i>
Hills Shire Council	- Ensure that all setback areas are marked with survey markers or similar and that works have not encroached into the setback areas. - The maintenance of landscape screening around the site. - That in general terms, compliance with all conditions of consent is required.	Table A4.1 Conditions 2(2b) and 2(15)]. Figure 1. Appendix 4.
CCC	No comments/issues were nominated.	-
Resources Regulator	No comments/issues were nominated.	-
Water NSW	No comments/issues were nominated.	-
NSW DCCEEW - CPHR	No response received.	-

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

CCC Meeting	Issues Raised and Location Addressed
9 November 2022	- Ongoing discussion regarding timing for school zone and follow up with R. Preston MP. - Requested that representations to R.Preston MP also include bigger speed signs (60km/hr) as you enter Maroota. - No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.
3 May 2023	- Nil response from R.Preston MP over 3 year period regarding school zone. - Community member raised issue of trucks still travelling too fast along Wisemans Ferry Road, but not the sand trucks. - No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.
8 November 2023	No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.
28 May 2024	- 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. - No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.
6 November 2024	- DPHI undertook a site inspection at both quarries. There were no issues or items of concerns identified during the audit. - Dust exceedances reported to EPA & DPHI which was caused by nearby agricultural activities. - No Quarry-related compliance, environmental or operator issues raised by community or Council representatives.
7 May 2025	- Dust exceedances are reported to EPA & 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 - Predicted noise at one receiver was slightly over the noise criteria but considered negligible impact with Quarry only "intermittently just audible. - 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. - Dixon Sand to approach TfNSW (the relevant road authority) regarding maintenance.
5 November 2025	Minutes not available at time of audit.

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 ONR 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 E1021C_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: It was planned that a draft of the completed audit report would be supplied to the Company to review for factual correctness and with a final request for any audit evidence.

It was planned that the audit report would be 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 250-09-01 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) a review of any notices, orders, penalty notices or prosecutions;
- b) a review of any received complaints;
- c) a review of any incidents; and
- d) 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 3916 and WAL 24341

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 the Development Consent DA 250-09-01, Environment Protection Licence 3916 and Water Access Licence 24341 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 ONR 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 ONR 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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), 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 Resources Regulator issued a number of Section 23 and Section 191 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

A total of two complaints were received 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
31/03/25	Alleged that sediment from the Quarry was being tracked onto Old Northern Road. Received through EPA.	The Company immediately carried out an inspection of the access road and intersection to assess source of sediment. Photographic evidence was taken and provided to EPA. Determined that source is not the Quarry, rather arising from inadequate drainage along Old Northern Road. EPA responded and no further action was required.
10/09/25	Truck was alleged to be driven exceeding the speed limit and driving in an erratic manner. Complaint initially received by PF Formation and passed on to Dixon Sand.	The Company investigated the complaint, confirming the location outside of the Maroota area and therefore being the responsibility of the truck company. The truck company was informed of the specifics of the complaint for implementation of their investigation and disciplinary action protocols.

The complaint from 31 March 2025 was discussed at the 7 May 2025 CCC meeting (see **Table 2.2**) and whilst the Company confirmed that the source of the sediment on Old Northern Road was not related to the Quarry. The Company committed to following up TfNSW in relation to maintenance of the drainage along Old Northern Road, however, it is advised that members of the public directly contacted TfNSW and a community notification was subsequently provided by TfNSW dated November 2025. The notification confirms planned maintenance works to be undertaken on Old Northern Road including the removal of debris from both sides of the road shoulders.

During the audit inspection excessive sediment build up in the shoulders of Old Northern Road was observed (*Photo E1021C_001, 002*) and is considered likely to be an ongoing source of sediment onto the road following rain events. However, care should continue to be taken to minimise potential tracking of sands and fines from Quarry-related sources (see **Improvement ONR I1/25**).

3.1.3 Incidents

The 2022/2023, 2023/2024 and 2024/2025 Annual Reviews reported a total of 29 ‘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 PM₁₀ levels, and 25 incidents related to elevated deposited dust levels.

The elevated 24-hour PM₁₀ levels were recorded on 27 May 2025, reaching 71.7µg/m³ 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 gauges D1A and D5 exceeded the rolling annual average dust deposition criteria of 4.0g/m²/month a combined total of 25 times throughout the audit period. Notably, on 15 of these occasions the monthly results were below the 4.0g/m²/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 D1A were considered to be the result of adjoining farm activities. Similarly, all exceedances at D5 were considered to be the result of adjoining farm activities, however, on two occasions (January and February 2024) contributions from bund wall maintenance was also noted.

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 EPL3916 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 ONR I2/25**). 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, 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 2

Aspect	Approval Criteria / EIS Prediction	Performance During the Audit Period
Noise	All private residences Day: 44dB(A). Shoulder: 37dB(A). Any class room at Maroota Public school. Day: 45B(A). (DA Condition 3(3))	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. No noise exceedances or non-compliance were recorded.
Air Quality	PM ₁₀ 24hr (incremental) = 50ug/m ³ PM ₁₀ Annual (cumulative) = 30ug/m ³ TSP Annual (cumulative) = 90ug/m ³ Dep Dust (cumulative) = 4g/m ² /month Dep Dust (incremental) = 2g/m ² /month (DA Condition 3(7))	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 ₁₀ criteria, and 25 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 40 between 5.45 am and 7.00 am (DA Condition 2(7))	Two truck-related complaint were received during the audit period, one related to driver conduct, which was referred to the relevant trucking company for actioning, and one relating to sediment tracking, which was determined not to be due to Quarry operations (see Table 3.1). During the audit period, maximum daily truck movements remained within the approved limit with the following maximums. • 2022/2023 maximum daily truck movements = 180 • 2023/2024 maximum daily truck movements = 176 • 2024/2025 maximum daily truck movements = 178 No trucks dispatched prior to 6:00am. Maximum recorded truck movements before 7:00am remained within the approved limit with the following maximums. • 2022/2023 maximum truck movements = 40 • 2023/2024 maximum truck movements = 34 • 2024/2025 maximum truck movements = 38
Surface Water	The DA does not specify criteria. Discharge water quality limits pH 4.5 to 6.5 TSS 50mg/L (EPL Condition L2.4) 2001 EIS predicted that there would be no significant impacts.	No water-related complaints were received and no discharges occurred during the audit period. Ambient water quality monitoring (at location SW19) regularly recorded pH, TSS and turbidity above the 80 th percentile of baseline data. However, this was considered to be the result of higher than average rainfall and flows within the creek rather than Quarry operations.

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

Page 2 of 2

Aspect	Approval Criteria / EIS Prediction	Performance During the Audit Period
Ground Water	Neither the DA nor EPL specify quality criteria. No extraction is to occur within 2m of the highest recorded wet weather groundwater level within the Maroota Tertiary Sands Groundwater Source (MTSGS) buffer zone. (DA Condition 2(20)) The 2001 EIS predicted it would be unlikely that there would be extraction induced lowering of groundwater levels. Due to removal of humic material during quarrying, it was considered possible that a slight increase in groundwater pH may occur.	The Maximum Extraction Depth map was reviewed and updated 11 January 2023 (<i>Document ONR22-2025</i>) and defines maximum extraction depths within and beyond the MTGS buffer zone. The extraction limit above the MTSGS buffer zone for Lot 1 and 2 has been calculated to be 204m AHD. Procedures for extraction depth limit checks, including monthly visual survey from control points and the engagement of surveyors once extraction approaches within 5m of the maximum extraction depth, are outlined in Section 5.2.2.1 of the SWMP. Surveys of extraction areas are undertaken annually to confirm extraction volumes. It is advised extraction remained above this level during the audit period with a process in place to guide extraction depths. Whilst compliance is considered likely based on the process in place, survey records of the completed / final extraction depths were not available (Recommendations ONR R1/25 and ONR R2/25). The Annual Reviews report that groundwater levels have responded to climatic conditions with decreasing levels over the audit period due to a return to average rainfall. Groundwater quality monitoring indicates a relatively stable pH with no discernible increase (or decrease) in pH levels since 2015 and stable electrical conductivity (EC) since 2010. Results do not indicate an extraction induced lowering of groundwater levels or a significant impact upon water quality.
Heritage	No heritage matters were identified or expected to be encountered.	The Environmental Officer confirms that no items suspected of being Aboriginal heritage have been encountered during the reporting period.
Biodiversity	A biodiversity offset strategy must be implemented. (DA Condition 3(25)) Progressive rehabilitation must be undertaken. (DA Condition 3(27))	The biodiversity offset strategy has been prepared, offset areas surveyed, plans submitted, and monitoring and management of the biodiversity offset areas has commenced. Proposed terms for a Public Positive Covenant were submitted by Dixon Sand to DPIE on 24 August 2019. Dixon sand further contacted (now) DPHI 31 January 2023 and a response is awaited. Progressive rehabilitation has been undertaken at the quarry where practicable to reduce the area of exposed surfaces (as reported in Section 7.3.7 of the respective Annual Reviews).

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 ONR Quarry.

Table 3.3
ONR Quarry Approvals and Licences

Approval / Licence / Permit	Issue Date	Expiry Date	Details / Comments
Development Approvals			
Development Consent 250-09-01	02/01/2003	Extraction 24/05/2042 Processing 14/02/2046	Development consent originally granted by the (then) Minister for Planning on 02 January 2003 and upheld by the Land and Environment Court, Decision 10206/2003 on 24 May 2004. The development consent has been subsequently modified on five occasions, with modification No. 5 approved 17 November 2017. An application for MOD6 was exhibited during December 2023 but has not yet been determined, remaining under assessment.
Environment Protection Licence			
Environment Protection Licence No. 3916	7/12/2000	Renewed annually	Issued by EPA. Current version date 12 September 2024. Reporting period 7 September to 6 September.
Other Approvals & Licences			
Water Supply Works Approval 10WA109393	1 July 2011	29 March 2035	Approves bore construction within the Sydney Basin Central Groundwater Source and Maroota Tertiary Sands Groundwater Source within Lot 1 DP1288211. This is the nominated work for WAL 24341.
Water Access Licence 24341	Continuing		Provides an entitlement of 30ML from the Sydney Basin Central Groundwater Source. Works Approval 10WA109393 is the nominated work.

3.2.2 Compliance Performance

A tabulated compliance assessment was completed against the requirements of DA 250-09-01, EPL3916 and WAL 24341. The full compliance assessment is presented as **Appendix 4** with a summary of the compliance performance provided as follows.

DA 250-09-01

The status of compliance against the conditional components of DA 250-09-01 was assessed as follows.

Compliant	-	184
Non-Compliant	-	6
Not Triggered	-	25
Not Determined	-	3
Total		218

EPL 3916

The status of compliance against the conditional components of EPL 3916 was assessed as follows.

Compliant	-	44
Non-Compliant	-	1
Not Triggered	-	14
Not Determined	-	0
Total		59

WAL 24341

The status of compliance against the conditional components of WAL 24341 was assessed as follows.

Compliant	-	2
Non-Compliant	-	0
Not Triggered	-	8
Not Determined	-	0
Total		10

3.2.3 Summary of Non-Compliances

Non-compliances recorded against DA 250-09-01 and EPL3916 are presented in full within **Appendix 4** and summarised as follows in **Tables 3.4** and **3.5**. No non-compliances were recorded against WAL 24341.

Table 3.4
Summary of Non-compliances with DA 250-09-01

Page 1 of 2

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
2(2)(b)	in accordance with the conditions of this consent and the Development Layout Plan. <i>Note: The Development Layout Plan is shown in Appendix 1.</i>	Non-compliant	This audit Figure 1	The Quarry layout was observed to reflect the Development Layout Plan included as Appendix 1 of DA 250-09-01. All disturbance has been undertaken within approved areas with all buffer areas retained as proposed. 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 3(16d), 3(21), 3(25)(c), 5(5)(a), and 5(9).
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS				
16. (d)	ensure that the boundaries of the approved limits of extraction are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits; and	Non-Compliant	Observations Photo E1021C_016 ONR15-2025	Permanent markers including timber stakes and steel fence pickets clearly delineate the approved limits of extraction A surveyed marker was also present on the northern wall of the Lot 1 and 2 pit to provide a basis for visual extraction depth estimates. However, at the time of the audit inspection the surveyed marker had been removed as a result of the construction of Silt Pond No. 6. See Recommendation ONR R1/25 . Procedures for progressive surveys of depth, including the engagement of surveyors once extraction reaches within 5m of the approved maximum extraction depth, are outlined in the SWMP. See Recommendation ONR R2/25 .
21.	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 records on its website every 6 months.	Non-compliant	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. This record includes times for entry of unladen trucks and exit time of laden trucks 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 Recommendation ONR R4/25 . The 6-monthly summary of laden truck movement records are published on the Dixon Sand website.
25. (c)	provide appropriate long term security for the Haerses Road Biodiversity Offset Area; and	Non-compliant	Advice from Environmental Officer. ONR25-2025 ONR26-2025	Proposed terms for a Public Positive Covenant were originally submitted by Dixon Sand to DPIE on 24 August 2019. Further follow up occurred since that time with Dixon Sand subsequently submitted the draft terms of the Public Positive Covenant instrument via the Major Project Portal 17 July 2024. This remains subject to considerations / assessment by DPHI with no response received as at the time of the audit. See Recommendation ONR R5/25 .

Table 3.4 (Cont'd)
Summary of Non-compliances with DA 250-09-01

Page 2 of 2

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
5 (a)	Within 3 months of the submission of an incident report under condition 10 below;	Non-compliant	ONR39 to 40-2025 Advice from Environmental Officer.	During the audit period a total of 29 'incident' reports were submitted during the audit period. Of these 26 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. Review of the plans was formally submitted on one occasion (in conjunction with the review triggered by the Annual Review). Incident reports from 11 June 2024 onwards include a note that the AQMP was under review and revision in consultation with EPA. It is advised that no updates to the other management plans were required. See Recommendation ONR R6/25 and Improvement ONR I13/25 .
9	The Applicant must immediately notify the Secretary (using the contact name, email address and phone number provided by the Department from time to time) and any other relevant agencies of any incident.	Non-compliant	ONR43-2025 Advice from Environmental Officer.	During the audit period a total of 29 'incident' reports were submitted 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 26 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. Recommendation ONR R7/25 .

Table 3.5
Summary of Non-compliances with EPL 3916

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
U1.4	Air Quality Monitoring Report: By (fourteen months of issuing the Variation Notice), the Licensee must provide the EPA, via email at info@epa.nsw.gov.au, 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: a. analyse and summarise the data including a comprehensive summary of the monitoring undertaken as required outlined in condition U1.3, and b. adequately addresses and justify any recommendations on the continuation or changes to the dust monitoring at the Premises and supported by valid data	Non-Compliant	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 (Recommendation ONR3/25).

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 3.6**.

Table 3.6
Strategies, Plans and Programs Audited

Strategy / Plan / Program	Status
Environmental Management Strategy (EMS)	Current version dated February 2024. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 5 Condition 1</i> . Approved by DPHI 13 March 2024.
Noise Management Plan (NMP)	Appendix 6 of the Environmental Management Strategy. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 3 Condition 6</i> . Current version of NMP dated April 2020 approved on 22 October 2020.
Air Quality Management Plan (AQMP)	Appendix 7 of the Environmental Management Strategy. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 3 Condition 9</i> . Current version of AQMP dated November 2020 approved on 16 November 2020.
Soil and Water Management Plan (SWMP)	Appendix 8 of the Environmental Management Strategy. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 3 Condition 20</i> . Current version of SWMP dated November 2020 approved on 16 November 2020.
Traffic Management Plan (TMP)	Appendix 9 of the Environmental Management Strategy. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 3 Condition 23</i> . Current version of TMP dated November 2020 approved on 16 November 2020.
Biodiversity and Rehabilitation Management Plan (BRMP)	Appendix 10 of the Environmental Management Strategy. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 3 Condition 29</i> . Current version of BRMP dated November 2020 approved on 16 November 2020.
Community Relations Plan (CRP)	Appendix 11 of the Environmental Management Strategy. Prepared by Umwelt. Requirement of DA 250-09-01 <i>Schedule 5 Condition 1(f)</i> . Current version of CRP dated April 2020 approved on 16 November 2020.

3.3.2 Review of Strategies, Plans and Programs

3.3.2.1 Environmental Management Strategy

The EMS addresses the requirements of DA 250-09-01 *Schedule 5 Condition 1* and is structured in an appropriate manner. The EMS is supported by the other management plans required by DA 250-09-01 which are appended to the EMS.

In relation to matters considered appropriate for improvement, the following are 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 ONR I13/25**.

The current 2024 EMS and management plans (dated 2020) principally include figures with aerial photography dated 2016. 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. See **Improvement ONR I5/25**.

It is noted that the 2024 EMS includes an interactive / navigable Table of Contents which links to elements within the document (e.g. sections, figures, tables, appendices) consistent with suggested improvements provided as part of the 2022 Independent Environmental Audit.

3.3.2.2 Noise Management Plan

The 2020 Noise Management Plan (NMP) adequately addresses the requirements of DA 250-09-01 and EPL 3916 and includes a summary of the regulatory requirements, the existing noise environment, assessment criteria, mitigation measures, monitoring, reporting, responsibilities and review. Given the range of modifications that have previously occurred to DA 250-09-01, the inclusion of a summary of relevant noise management commitments included in the documentation supporting the modifications is very useful. 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 2020 NMP, EPL3916 has been varied three times. The only changes within the EPL conditions relating to noise include update to references from the *Industrial Noise Policy 2000* to the *Noise Policy for Industry 2017*. It is considered that this minor change can be included during the next update of the NMP and is not material.

In relation to implementation of the NMP, operations at the Quarry appear to be undertaken generally in accordance with the management measures, monitoring and reporting requirements outlined in the document. Whilst no non-compliances were recorded during the audit period exceedances were recorded during the previous audit period and recommendations made for additional mitigation measures relating to introduction of potentially noise equipment or changes in process. An update to the NMP is recommended as an improvement to incorporate the previously recommended management measures so that they are present as a prompt if required in the future (see **Improvement ONR I4/25**).

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

3.3.2.3 Air Quality Management Plan

The Air Quality Management Plan (AQMP) adequately addresses the requirements of DA 250-09-01 and EPL 3916 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. Given the range of modifications that have occurred to DA 250-09-01, the inclusion of a summary of relevant air quality management commitments included in the documentation supporting the modifications is very useful. 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 2020 AQMP, EPL3916 has been varied three times. The last variation on 12 September 2024 includes 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 I7/25**).

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

3.3.2.4 Soil and Water Management Plan

The approved 2020 Soil and Water Management Plan (SWMP) adequately addresses the requirements of DA 250-09-01 *Schedule 3 Condition 20* and is structured in an appropriate manner. The inclusion of a summary of relevant soil and water management commitments included in the documentation supporting the various modifications to the development consent is very useful.

The 2020 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 10th, 50th and 90th percentile years to indicate the most likely Quarry inflows and water demand.
- 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.

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

Section 3.2.3.6 – The requirement for monthly inspections of long-term erosion and sediment controls, in addition to inspections prior to and after forecasted rainfall events, is identified in the SWMP and the Monthly Site Condition Checklist. The basis for assessing the condition of diversion bunds and recommending maintenance should be clarified in SWMP and on the Monthly Site Condition Checklist to avoid uncertainty. See **Improvement ONR I10/25**.

Section 5.1.1 – The requirement for consultation with DPI Water (Fisheries) can now be updated to reflect the outcomes of consultation and cross reference made to the appropriate documentation specifying the required permitting required for relocation of aquatic fauna from on-site dams. **Improvement ONR I9/25.**

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

3.3.2.5 Traffic Management Plan

The Traffic Management Plan (TMP) adequately addresses the requirements of DA 250-09-01 *Schedule 3 Condition 23* and is structured in an appropriate manner. The TMP is supported by a number of appendices including the Site Traffic Control Plan and Site Traffic Management Plan, Maroota Local Traffic Management Policy 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.

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

Section 4 – Section 4 and the Table of Contents for the TMP incorrectly identify appendices which form part of the Driver's Code of Conduct.

Section 5 should be updated to reflect re-inductions (with the TMP only currently requiring induction of new drivers).

See **Improvement ONR I11/25.**

In relation to implementation of the TMP, no non-conformance was identified with respect to its implementation. However, a non-compliance has been recorded against one of the operating conditions of DA 250-09-01 *Schedule 3 Condition 21* in relation to records of arrival time for truck movements. Currently 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). Given that one laden movement also requires one unladen movement the system provides confirmation of compliance with total truck movements. However, compliance with arrival times cannot be verified with the current system. See **Recommendation ONR R4/25.**

3.3.2.6 Biodiversity and Rehabilitation Management Plan

The 2020 Biodiversity and Rehabilitation Management Plan (BRMP) adequately addresses the requirements of DA 250-09-01 *Schedule 3 Condition 29* and is generally structured in an appropriate manner. It is noted that performance and completion criteria for threatened species are included in Section 6.5.6 whilst the remaining performance and completion criteria, including those for translocation, are outlined in Section 5.2. Broad performance criteria are also included the approved Flora and Fauna Monitoring Program which forms Appendix 5 of the approved BRMP.

In relation to matters for improvement, Section 7.2 of the BRMP outlines the key rehabilitation and management measures for the next 3 years of operation, however, the currently approved BRMP is dated 2020. The measures specified in Section 7.2 appear to be generally appropriate but they do not reflect the current area of operations and should be reviewed and updated as necessary. This would include items such as placement of topsoil on the 250m buffer bund. See **Improvement ONR I6/25**.

No non-conformances or improvements were identified with respect to the BRMP.

3.3.2.7 Community Relations Management Plan

The Community Relations Management Plan (CRMP) adequately addresses the requirements of DA 250-09-01 Schedule 5 Condition 1(f) and is generally structured in an appropriate manner. The CRMP provides a useful summary of the strategy for and approach to communication with the community. The preparation of the plan in consultation with the Hills Shire Council, Maroota Public School, and the CCC provides a level of confidence that preferred communication methods and frequencies are being applied. The inclusion and use of attitudinal surveys is commended and provides an excellent opportunity to ensure that focus is being placed on relevant matters.

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

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. A number were also not triggered during the current audit period. Of the 19 recommendations and improvements, nine 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 ONR R7/25** and **Improvement I13/25**).

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 ONR 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 “ONR R” and are provided in Section 4.2 whilst suggested “Improvements” have been presented with the prefix “ONR 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 seven (7) compliance-based Recommendations and 18 suggested Improvements are provided for the Company’s consideration and action.

4.2 Recommendations Arising From Non-compliances

ONR R1/25 The survey marker on the northern wall of the extraction area within Lot 1 (or suitable alternative) should be reinstated to ensure that the process for ensuring approved extraction depth is not exceeded.

It is advised that the previously established marker was removed during works to establish Silt Pond No. 6. This survey marker forms part of the approved monitoring program (Section 5.2.2.1 of the SWMP) to ensure extraction does not exceed the extraction limits and is therefore required to be reinstated to enable continued implementation of the SWMP.

ONR R2/25 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 5.2.2.1 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.

- ONR R3/25** The EPA should be requested to vary the conditions of EPL 3916 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 ONR I7/25**).

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.

- ONR R4/25** 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 ClearWeigh system provides 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 21 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.

- ONR R5/25** Continue to follow up with the DPHI to ensure that the Positive Public Covenant to provide long-term security of the Haerses Road Biodiversity Offset Area is fully processed to enable it to be implemented.

Dixon Sand has submitted all required information regarding the Positive Public Covenant to DPHI and awaits the Department's response in order for this matter to be finalised.

- ONR R6/25** 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 29 'incident' reports were submitted during the audit period. Review of the plans was formally submitted on one occasion (in conjunction with the review triggered by the Annual Review). Incident reports from 11 June 2024 onwards also 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.

- ONR R7/25** 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 29 'incident' reports were submitted 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.

4.3 Suggested Improvements

- ONR I1/25** 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.

Whilst issues with sediments on Old Northern Road appear to be principally a result of the build-up of materials on the road shoulders which is to be addressed through TfNSW maintenance, minor tracking / deposition was observed on the northern (exit) side of the access road indicating the source is from Quarry activities (Photos E1021C_100, 101, 103 to 106).

- ONR I2/25** 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.

- ONR I3/25** A survey should be undertaken at completion (or completion of sections) of the 5m bunding within Lots 1 and 2 to confirm the final bund height meets the requirement.

Construction of the bunding on the eastern extent of Lots 1 and 2 commenced during the audit period. Whilst it appears to be compliant this should be confirmed through measurement.

- ONR I4/25** The Noise Management Plan should be updated to include management measures for the introduction of new and potentially noisy items of equipment or undertaking new tasks where operating circumstances are different to those previously encountered. Measures should include review of the sound power level (either supplied by the manufacturer or measured on-site) and, where appropriate, testing of equipment / operational circumstances within a shielded location or at a time when all other equipment is not operating.

These measures were previously recommended in response to measured noise exceedances recorded in December 2019 and June 2021. Whilst introduction of new items of equipment or processes is not a common practice, inclusion of relevant measures within the NMP will act as a prompt in the future should this occur.

- ONR I5/25** 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 2016. 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.

- ONR I6/25** During the next period of bund construction, consideration should be given spreading of topsoil material over all parts of the completed bund that have not yet revegetated. Alternatively, spreading of appropriate seed, mulch/cuttings may be undertaken.

It was advised that the new bunding on the eastern limit of extraction within Lot 1 and 2 will self-seed from the adjacent vegetation. Whilst there is some evidence of self-seeding this remains limited despite a substantial period of time since formation (Photos E1021C_030 and 031).

- ONR I7/25** 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 3916 Condition U1. If required, EPA should be requested to reference the AQMP required by DA 250-09-01 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 250-09-01 are required to be undertaken in consultation with EPA and therefore this should be a streamlined process.

- ONR I8/25** 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 of which were fading/wearing. A more permanent marking, such as engraving as per MW2, would be preferable.

- ONR I9/25** The permitting requirements for relocating aquatic fauna and turtles from the on-site dams should be reflected in the appropriate documentation and Section 5.1.1 of the SWMP updated to cross reference this documentation. For example, this could be achieved through updating the pre-clearance protocols within the Biodiversity and Rehabilitation Management Plan.

The Company has appropriately consulted with DPI Fisheries to confirm the permitting requirements under the Fisheries Management Act 1994. To ensure that compliance is achieved in the future these requirements should be reflected in the appropriate documentation.

- ONR I10/25** 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 2020 Monthly Site Condition Check List (forming part of the current EMS and provided on the Dixon Sand website) was updated 22 June 2023 the items and wording in the updated checklist remain the same as per the 2020 checklist.

Whilst the checklist 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.

- ONR I11/25** All documentation referred to in the Driver's Code of Conduct should be reviewed and updated, where appropriate. These include:

- the Maroota Local Traffic Management Policy;
- the Site Induction for Drivers; and
- the Site Traffic Control Plan.

Section 4 of the TMP, and the Table of Contents of the TMP, should also be updated to correctly identify appendices which form part of the Code and Section 5 updated to reflect the process for reinductions (and the records to be retained).

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.

The TMP has not been updated since the 2022 Independent Environmental Audit recommended improvement for review and update. It is important that all drivers sign a copy of the Site Induction and are given a full set of all documents.

- ONR I12/25** The Biodiversity and Rehabilitation Management Plan should be reviewed and updated as required, in particular Section 7.1 which outlines the management measures to be implemented over the next 3 years. Where these measures remain consistent for the next 3 years this should be noted in the formal management plan review correspondence with DPHI.

*The currently approved BRMP is dated 2020. Whilst the key rehabilitation and management measures specified in Section 7.2 appear to be generally appropriate they do not reflect the current area of operations and should be reviewed and updated as necessary. This would include items such as placement of topsoil on the 250m buffer bund (see **Improvement ONR I6/25**).*

- ONR I13/25** 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.

- ONR I14/25** Areas with equipment containing hydrocarbons / hydrocarbon residues should be inspected as part of the monthly site inspection checklist and any hydrocarbon staining cleaned up and material appropriately disposed of.

Several areas of minor hydrocarbon staining were observed on unsealed surfaces. These appeared to be the result of rain washing hydrocarbons off stored equipment (Photos E1021C_059, 068).

- ONR I15/25** Where reporting is undertaken against the EPL PM₁₀ criteria of 42µg/m³ this should be compared to the rolling 24hr average PM₁₀ in accordance with Condition M2.4.

The CBased monitoring reports appended to the Annual Review appear to report against daily PM₁₀ results rather than rolling 24-hour average PM₁₀ results. This has resulted in reporting of compliance with the criteria when it was actually exceeded.

- ONR I16/25** CBased should be requested to include additional tabs in the monthly monitoring data summary spread sheet which include:

- each 15 minute PM₁₀ result; and
- each rolling 24-hour average PM₁₀ results (each 15 minutes).

Tabs including the meteorological data averaged at the time intervals outlined in EPL Condition M2.4 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 3916.

ONR I17/25 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.

ONR I18/25 Consideration should be given to providing a monthly update of all environmental monitoring data collected (for that month) in accordance the management plans approved for DA 250-09-01.

Currently PM₁₀ data is provided on a monthly basis, however, other data is only provided / summarised annually within the Annual Review. Whilst DA Condition 5(15) does not specify the period that monitoring summaries must be provided, it is considered best practice to make relevant results available at suitable intervals (e.g. monthly).

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: Old Northern Road Quarry - Independent Audit Team Nomination

Dear Hunny,

I refer to your request for the Planning Secretary's endorsement (DA250-09-01-PA-55) of a suitably qualified, experienced, and Independent Audit Team for the 2025 Independent Environmental Audit (**2025 IEA**) of Old Northern Road Quarry (DA250-09-01), 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 RW 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 Old Northern Road Quarry was initially approved by NSW Planning on 20 March 2025 (DA250-09-01-PA-52).

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 DA250-09-01 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.

Yours

sincerely,

A handwritten signature in blue ink, appearing to read 'Julia Pope'.

Julia Pope
Team Leader Compliance - Metro
Compliance

As nominee of the Planning Secretary

Appendix 2

Independent Audit Declaration Form

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

DECLARATION OF INDEPENDENCE FORM

Project Name:	Old Northern Road Quarry – Maroota
Consent Number:	DA250-09-01
Description of Project:	Sand Extraction and Processing Operation
Project Address:	4610 Old Northern Road, Maroota NSW 2756
Proponent:	Dixon Sand Pty Ltd
Audit Date:	20 March 2025
I declare that: i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child; ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child; iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit; iv. I am not an Environmental Representative for the project; and v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so. Notes: a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).	
Name of Proposed Auditor:	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:	Old Northern Road Quarry – Maroota
Consent Number:	DA250-09-01
Description of Project:	Sand Extraction and Processing Operation
Project Address:	4610 Old Northern Road, Maroota NSW 2756
Proponent:	Dixon Sand Pty Ltd
Audit Date:	30 October 2025
I declare that: i. I am not related to any proponent, owner, operator or other entity involved in the delivery of the project. Such a relationship includes that of employer/employee, a business partnership, sharing a common employer, a contractual arrangement outside an Independent Audit, or that of a spouse, partner, sibling, parent, or child; ii. I do not have any pecuniary interest in the project, proponent or related entities. Such an interest includes where there is a reasonable likelihood or expectation of financial gain (other than being reimbursed for performing the audit) or loss to the auditor, or their spouse, partner, sibling, parent, or child; iii. I have not provided services (not including independent reviews or auditing) to the project with the result that the audit work performed by themselves or their company, except as otherwise declared to the Department prior to the audit; iv. I am not an Environmental Representative for the project; and v. I will not accept any inducement, commission, gift or any other benefit from auditee organisations, their employees or any interested party, or knowingly allow colleagues to do so. Notes: a) Under section 10.6 of the Environmental Planning and Assessment Act 1979 a person must not include false or misleading information (or provide information for inclusion in) in a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is false or misleading in a material respect. The proponent of an approved project must not fail to include information in (or provide information for inclusion in) a report of monitoring data or an audit report produced to the Minister in connection with an audit if the person knows that the information is materially relevant to the monitoring or audit. The maximum penalty is, in the case of a corporation, \$1 million and for an individual, \$250,000; and b) The Crimes Act 1900 contains other offences relating to false and misleading information: section 307B (giving false or misleading information – maximum penalty 2 years imprisonment or 200 penalty units, or both).	
Name of Proposed Auditor:	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 = 17)

From: Nicole Slezak <nicole.slezak@dpie.nsw.gov.au>
Sent: Wednesday, 22 October 2025 4:11 PM
To: Scott Hollamby
Subject: Re: 1021/1022: 2025 Old Northern Road and Haerses Road - Endorsement Request & Consultation

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 |

4PSQ, Parramatta NSW 2150

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.

From: Scott Hollamby <scott@rwcorkery.com>

Sent: Monday, 20 October 2025 10:49 AM

To: Gil Bloxham <giles.bloxham@dpie.nsw.gov.au>

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

Good Morning Giles,

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

Many thanks



Exemplar Global (ISO 14001:2015) Lead Auditor:

Scott Hollamby

Senior Environmental Consultant

☎ 0437 858 511

✉ scott@rwcorkery.com

🌐 www.rwcorkery.com.au

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From: Scott Hollamby

Sent: Monday, 20 October 2025 8:09 AM

To: 'giles.bloxham@dpie.nsw.nsw.gov.au' <giles.bloxham@dpie.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



Exemplar Global (ISO 14001:2015) Lead Auditor:

Scott Hollamby

Senior Environmental Consultant

☎ 0437 858 511

✉ scott@rwcorkery.com

🌐 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

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.

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

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

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>
Sent: Thursday, 16 October 2025 9:11 AM
To: Scott Hollamby
Cc: Environment; Sam Wells
Subject: RE: 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

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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 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

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

From: Scott Hollamby <scott@rwcorkery.com>
Sent: Wednesday, 15 October 2025 10:42 AM
To: Development Sydney <Development.Sydney@transport.nsw.gov.au>**Cc:** Simon Turner

<Simon.Turner2@transport.nsw.gov.au>; Environment <environment@dixonsand.com.au>; Sam Wells
<samw@rwcorkery.com>

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

💻 www.rwcorkery.com.au

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From: Kristine McKenzie <kmckenzie@thehills.nsw.gov.au>
Sent: Friday, 17 October 2025 4:09 PM
To: Scott Hollamby
Subject: Independent Audit

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Hi 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
Administration Centre, 3 Columbia Court Norwest NSW 2153
PO Box 7064, NORWEST NSW 2153
www.thehills.nsw.gov.au

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From: Lisa Andrews <lisaandrews.ic@gmail.com>
Sent: Wednesday, 29 October 2025 11:27 AM
To: Scott Hollamby
Subject: Re: 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

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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

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On Wed, Oct 15, 2025 at 11:24 AM Scott Hollamby <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



Exemplar Global (ISO 14001:2015) Lead Auditor:



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Scott Hollamby

Senior Environmental Consultant

☎ 0437 858 511

✉ scott@rwcorkery.com

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From: info@sys.resources.nsw.gov.au on behalf of NSW Resources
<info@sys.resources.nsw.gov.au>
Sent: Wednesday, 15 October 2025 1:29 PM
To: Scott Hollamby
Cc: cau@regional.nsw.gov.au
Subject: AREQ0068799 | 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

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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.

**** All Mining Act forms and applications are to be lodged online at Regulator Portal <https://portal.resources.nsw.gov.au>**



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.



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 Rod 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/>>
Exemplar Global (ISO 14001:2015) Lead Auditor:

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[A picture containing text Description automatically generated]
[A blue and white sign with white text Description automatically generated]

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Ref:MSG1771455_CpEd7hKyLoXO2vxMzhbU

From: Environmental Assessments <Environmental.Assessments@waternsw.com.au>
Sent: Wednesday, 15 October 2025 12:33 PM
To: Scott Hollamby
Cc: Environment; Sam Wells
Subject: RE: 1021/1022: Old Northern and Hearses Road Quarries - Audit Consultation Request

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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

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Senior Environmental Consultant



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Appendix 4

Compliance Review – Approvals

(Total No. of pages including blank pages = 69)

Table A4-1 DA 250-09-01

Table A4-2 EPL 3916

Table A4-3 WAL 24341

Table A4-1
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
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.
TERMS OF CONSENT				
2.	The Applicant must carry out the development:			
2. (a)	generally in accordance with the EIS, SEE (Mod 1), SEE (Mod 2), EA (Mod 3), EA (Mod 4) and EA (Mod 5); and	Compliant	Observations ONR15 to 21-2019 ONR01 to 03-2025	The Quarry was found to be 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 Plan. <i>Note: The Development Layout Plan is shown in Appendix 1.</i>	Non-compliant	This audit Figure 1	The Quarry layout was observed to reflect the Development Layout Plan included as Appendix 1 of DA 250-09-01. All disturbance has been undertaken within approved areas with all buffer areas retained as proposed. 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 3(16d), 3(21), 3(25)(c), 5(5)(a), 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 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
TERMS OF CONSENT (Cont'd)				
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;			
4. (c)	and the implementation of any actions or measures contained in these documents.			
LIMITS OF CONSENT				
5.	The Applicant may:			
5. (a)	carry out quarrying operations on the site until 24 May 2042; and	Compliant	-	The approved timing for quarrying operations has not expired.
5. (b)	continue to receive and process extractive material from Haerses Road Sand Quarry, and dispatch quarry products from the site, until 14 February 2046.	Compliant	-	The approved timing for dispatch operations has not expired.
	<i>Notes: 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 until the rehabilitation of the site and those requirements and undertakings have been carried out to the standard required by the applicable conditions.</i>	Not Triggered	-	The Quarry remains within the approved operational period.
6.	The combined production of quarry products from the site, including extractive material sourced from the Haerses Road Sand Quarry, must not exceed 495,000 tonnes per annum.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	During the audit period production remained within the approved limit. 2022/2023 = 357,066.28t 2023/2024 = 243,043.70t 2024/2025 = 244,976.63t

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Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
LIMITS OF CONSENT (Cont'd)				
7.	Truck movements at the site (i.e. one way trip, either arrival or dispatch), including truck movements between the site and the Haerses Road Sand Quarry, must not exceed:			
7. (a)	180 per day; and	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	During the audit period maximum daily truck movements remained within the approved limit. 2022/2023 maximum daily truck movements = 180 2023/2024 maximum daily truck movements = 176 2024/2025 maximum daily truck movements = 178
7. (b)	40 between 5.45 am and 7.00 am. <i>Note: Operating hours for arrival and dispatch of trucks are also controlled under condition 1 of Schedule 3.</i>	Compliant	ONR01-2025 ONR02-2025 ONR03-2025 ONR53-2025	Annual Reviews record that the maximum number of trucks movements between 5:45am to 7:00am remained with the approved limit. 2022/2023 maximum no. trucks 5:45 – 7:00 am = 40 2023/2024 maximum no. trucks 5:45 – 7:00 am = 34 2024/2025 maximum no. trucks 5:45 – 7:00 am = 38 The number of trucks movements between 5:45am and 7:00am is separately recorded by the weighbridge officer within an Excel spreadsheet (separate to the ClearWeigh software which records total movements).
STRUCTURAL ADEQUACY				
8.	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. <i>Notes:</i> - Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for any proposed building works; and - Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.	Not Triggered	Advice from Environmental Officer	No new buildings or structures requiring approval were constructed during the audit period.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
DEMOLITION				
9.	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	No demolition work was undertaken during the audit period.
PROTECTION OF PUBLIC INFRASTRUCTURE				
10.	Unless the Applicant and the applicable authority agree otherwise the Applicant must:	Not Triggered	Advice from Environmental Officer Observation.	No repairs to public infrastructure have been required during the audit period. No readily visible damage was observed during the audit inspection.
10. (a)	repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and			
10. (b)	relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. <i>Note: This condition does not apply to damage to roads caused as a result of general road usage or otherwise addressed by contributions required by condition 12 below.</i>	Not Triggered	Advice from Environmental Officer	No relocation of public infrastructure has been required during the audit period.
OPERATION OF PLANT AND EQUIPMENT				
11.	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.
11. (a)	maintained in a proper and efficient condition; and			

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
OPERATION OF PLANT AND EQUIPMENT (Cont'd)				
11. (b)	operated in a proper and efficient manner.	Compliant	Observations Advice from Environmental Officer and Operations Manager ONR01 to 03-2025	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.
SECTION 94 CONTRIBUTION				
12.	The Applicant must pay Council an annual 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.
PRODUCTION DATA				
13.	The Applicant must:			
13. (a)	from the commencement of quarrying operations provide calendar year annual quarry production data to DRG using the standard form for that purpose; and	Compliant	ONR04-2025 ONR05-2025 ONR06-2025	Extractive Material Returns submitted during the audit period (2022-2023, 2023-2024 & 2024-2025).
13. (b)	include a copy of this data in the Annual Review.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Production data included in Annual Reviews relevant to the audit period.
COMPLIANCE				
14.	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	Sighted toolbox talks Induction records sighted. Advice from Environmental Officer.	All employees and contractors are required to undergo inductions which include the identification of consent conditions relevant to their positions. Regular toolbox talks are then utilised to highlight key conditions and environmental management requirements relevant to site personnel.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
LIMITS OF EXTRACTION				
Buffer Zones				
15.	The Applicant must maintain the fenced buffer zones between the approved limits of extraction and nearby land uses or sensitive environmental areas. The boundary of the buffer zones must be located:	Compliant	Observations. MinView, Six Maps and NearMap	Buffer zones and extraction areas appear to have been maintained during the audit period. Note, the western boundary of Lot 196 was not accessed during the audit inspection, however, review of aerial photography indicates the western extraction face did not change during the audit period. Based on aerial photography it appears disturbance has historically encroached the 10m buffer zone. This is already shown in the buffer area figure included as Appendix 2 of the Development Consent. As such compliance with the buffer conditions as presented in the consent is considered to have been maintained during the audit period.
15. (a)	not less than 250m from the boundary of Maroota Public School (Lot 78 DP 752025);	Compliant	ONR25-2019. Observations. Photos E1021C_011, 025, and 030.	Fences sighted during the site inspection were consistent with extraction areas and buffer areas as depicted in the Environmental Monitoring Program. Construction of the 5m bunding along the 250m buffer zone also commenced during audit period. Survey plans were prepared by McKinlay Morgan and Associated Pty Ltd.
15. (b)	not less than 10m from the boundary of Lot 117 DP 752025 along the boundary of Lot 1 DP 547255;	Compliant		
15. (c)	not less than 50m from the existing house on Lot 1 DP 547255;	Compliant		
15. (d)	not less than 50m from the <i>Kunzea rupestris</i> plant species on Lot 29 DP 752025;	Compliant		
15. (e)	not less than 10m from the western boundary of Lot 196 DP 752025; and	Compliant		
15. (f)	not less than 100m from the mapped extent of the MTSGS, with the exception of the area in the north of Lot 1 DP 547255 shown in blue edging in the figure in Appendix 2. <i>Note: This condition does not establish a new requirement to undertake these actions following the approval of Modification 5. Rather, it continues the previous requirement to undertake these actions.</i>	Compliant		

Table A4-1 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
LIMITS OF EXTRACTION (Cont'd)				
Identification of Areal Extraction Limits				
16.	The Applicant must:			
16. (a)	engage a registered surveyor to mark out the boundaries of the approved areal limits of extraction, incorporating the buffer zones identified in condition 15 above, prior to the commencement of quarrying operations on Lots 1 and 2 DP 547255;	Compliant	ONR25-2019 Observations.	A survey was undertaken and survey plan prepared by McKinlay Morgan and Associates Pty Ltd. Survey markers delineating extraction and buffer areas were sighted during the site inspection.
16. (b)	submit a survey plan of the buffer zones and setback boundary to the Secretary for approval at least one month prior to the commencement of quarrying operations on Lots 1 and 2 DP 547255;	Compliant	ONR25-2019.	Correspondence between Dixon Sand and DPE dated 30 September 2015 confirms the submission of a survey plan showing buffer zones and setback boundaries.
16. (c)	establish and maintain fencing along the surveyed buffer zone boundaries to prevent vehicles and unauthorized persons entering the area(s);	Compliant	Observations. Advice from Environmental Officer.	Fencing along surveyed buffer zone boundaries sighted during site inspection. Construction of the 5m bunding along the 250m buffer area boundary was commenced during the audit period. Fence inspections are included on the site condition checklist completed on a monthly basis by the Environmental Officer or delegate.
16. (d)	ensure that the boundaries of the approved limits of extraction are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits; and	Non-Compliant	Observations Photo E1021C_016 ONR15-2025	Permanent markers including timber stakes and steel fence pickets clearly delineate the approved limits of extraction A surveyed marker was also present on the northern wall of the Lot 1 and 2 pit to provide a basis for visual extraction depth estimates. However, at the time of the audit inspection the surveyed marker had been removed as a result of the construction of Silt Pond No. 6. See Recommendation ONR R1/25 . Procedures for progressive surveys of depth, including the engagement of surveyors once extraction reaches within 5m of the approved maximum extraction depth, are outlined in the SWMP. See Recommendation ONR R2/25 .

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
LIMITS OF EXTRACTION (Cont'd)				
Identification of Areal Extraction Limits (Cont'd)				
16. (e)	not commence work or operations on Lots 1 and 2, DP 547255 until the approved boundary has been fenced.	Compliant	ONR48-2019 Advice from Environmental Officer.	Fencing was completed on prior to 2016. Work / operations commenced in Lots 1 and 2 in February 2006.
Maximum Extraction Depth				
17.	Extraction below a depth of 15.24m below original ground level is restricted to Lot 196 DP 752025 within the hatched area shown in the figure in Appendix 2 and to a depth not greater than 127.5m AHD.	Compliant	ONR22-2025 ONR30 to 32-2025 Advice from Environmental Officer.	The extraction limits shown on the Maximum Extraction Depth Map are in accordance with the specified extraction depth restrictions in Lot 196 DP 752025, Lot 29 DP 752025, and Lots 1 and 2 DP 752025. The Maximum Extraction Depth Map limits maximum extraction depths to within 2m of the highest recorded wet weather ground level for the MTSGS buffer zone. Extraction has not yet commenced within the MTSG buffer zone. It is advised that extraction area depths are regularly checked using 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 the SWMP. Surveys of extraction areas have been provided but are not overlain with the approved extraction contours. Whilst compliance appears to have been achieved, an overlay is required to confirm. Recommendation ONR R2/25.
18.	Extraction on Lot 29 DP 752025 is limited to a depth not greater than 15.24m below original ground level.	Compliant		
19.	Extraction on Lots 1 and 2 DP 547255, with the exception of the MTSGS buffer zone, is limited to a depth not greater than 170m AHD in the east, gradually reducing to 153m AHD in the west, and as shown conceptually in the figure in Appendix 4.	Not Determined		
20.	The Applicant must ensure that no extraction occurs with 2m of the highest recorded wet weather groundwater level within the MTSGS buffer zone.	Not Triggered		
21. (a)	The Applicant must: establish the highest recorded wet weather groundwater level within the MTSGS buffer zone based on all available (and at least 12 months) site specific groundwater monitoring data;	Compliant	ONR15-2025	Table 1 of Appendix 3 of the SWMP for the Quarry identifies 202mAHD as the highest recorded wet weather groundwater level within the MTSGS buffer, based on records from monitoring bore MW2 since July 2003.
21. (b)	engage a suitably qualified and experienced expert to establish the maximum depths to which extraction can be undertaken within the MTSGS buffer zone to comply with condition 20 above; and	Compliant	ONR15-2025	Appendix 3 of the SWMP for the Quarry, prepared by Golder Associates, identifies a maximum extraction depth of 204mAHD within the MTSGS buffer zone.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS (Cont'd)				
LIMITS OF EXTRACTION (Cont'd)				
Maximum Extraction Depth (Cont'd)				
21. (c)	submit a Maximum Extraction Depth Map (contour map or similar) for the development, which demonstrates compliance with conditions 17 to 20 above (inclusive), to the Secretary for approval within 3 months of the approval of Modification 5.	Compliant	ONR15-2025 ONR38-2019.	The Maximum Extraction Depth Map, prepared by Golder Associates, submitted to the (then) DPE on 16 February 2018 and was approved by the (then) DPE on 3 July 2018.
22.	The Applicant must comply with the extraction depths specified in the Maximum Extraction Depth Map to the satisfaction of the Secretary.	Not Determined	ONR15-2025 Advice from Environmental Officer.	The Maximum Extraction Depth Map and associated extraction limits are included as Appendix 3 in the SWMP. Surveys of extraction areas have been provided but are not overlain with the approved extraction contours. Whilst compliance appears to have been achieved, an overlay is required to confirm. Recommendation ONR R2/25.
23.	Within 3 months of the completion of the Independent Environmental Audit (see condition 13 of Schedule5), the Applicant must review and update the Maximum Extraction Depth Map for the development to the satisfaction of the Secretary.	Compliant	ONR22-2025	Revised Maximum Extraction Depth Map, available on the Dixon Quarry Group website, was submitted on 18 January 2023 (within 3 months following the 2022 IEA which was submitted in January 2023).

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions												
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS																
NOISE																
Hours of Operation																
1.	The Applicant must comply with the operating hours set out in Table 1. Table 1: Operating hours <table><tr><th>Activity</th><th>Permissible Hours</th></tr><tr><td>Quarrying operations (excluding truck arrival, loading and dispatch)</td><td>7:00am to 6:00pm Monday to Saturday At no time on Sundays or public holidays</td></tr><tr><td>Truck arrival (unladen)</td><td>5:45am to 6:00pm Monday to Saturday At no time on Sundays or public holidays</td></tr><tr><td>Truck loading Truck dispatch Truck arrival (laden)</td><td>6:00am to 6:00pm Monday to Saturday At no time on Sundays or public holidays</td></tr><tr><td>Bund construction or rehabilitation works within 250m of Maroota Public School</td><td>7:00am to 6:00pm Monday to Friday during school holiday periods unless otherwise approved in writing by the EPA</td></tr><tr><td>Maintenance</td><td>May be conducted at any time, provided that these activities are not audible at any privately-owned residence</td></tr></table>	Activity	Permissible Hours	Quarrying operations (excluding truck arrival, loading and dispatch)	7:00am to 6:00pm Monday to Saturday At no time on Sundays or public holidays	Truck arrival (unladen)	5:45am to 6:00pm Monday to Saturday At no time on Sundays or public holidays	Truck loading Truck dispatch Truck arrival (laden)	6:00am to 6:00pm Monday to Saturday At no time on Sundays or public holidays	Bund construction or rehabilitation works within 250m of Maroota Public School	7:00am to 6:00pm Monday to Friday during school holiday periods unless otherwise approved in writing by the EPA	Maintenance	May be conducted at any time, provided that these activities are not audible at any privately-owned residence	Compliant.	Spot check despatch records. ONR01-2025 ONR02-2025 ONR03-2025	A spot check of despatch records (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. No noise-related complaints were received during the audit period.
Activity	Permissible Hours															
Quarrying operations (excluding truck arrival, loading and dispatch)	7:00am to 6:00pm Monday to Saturday At no time on Sundays or public holidays															
Truck arrival (unladen)	5:45am to 6:00pm Monday to Saturday At no time on Sundays or public holidays															
Truck loading Truck dispatch Truck arrival (laden)	6:00am to 6:00pm Monday to Saturday At no time on Sundays or public holidays															
Bund construction or rehabilitation works within 250m of Maroota Public School	7:00am to 6:00pm Monday to Friday during school holiday periods unless otherwise approved in writing by the EPA															
Maintenance	May be conducted at any time, provided that these activities are not audible at any privately-owned residence															
2.	The following activities may be carried out outside the hours specified in condition 1 above:															
2. (a)	delivery or dispatch of materials as requested by the NSW Police Force or other public authorities; and	Not Triggered	Advice from Environmental Officer	No despatch of materials outside of approved operational hours was requested by a public authority during the audit period.												
2. (b)	emergency work to avoid the loss of lives, property or to prevent environmental harm. In such circumstances, the Applicant must notify the Secretary and affected residents prior to undertaking the activities, or as soon as is practical thereafter.	Not Triggered	Advice from Environmental Officer	No emergency work was required outside of approved operational hours during the audit period.												

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement				Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)							
NOISE (Cont'd)							
Hours of Operation (Cont'd)							
3.	The Applicant must ensure that the noise generated by the development does not exceed the criteria in Table 2 at any residence on privately-owned land or at the Maroota Public School. Table 2: Noise Criteria Db(a)				Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Attended noise monitoring undertaken during the audit period did not identify exceedances of the relevant noise criteria for the Quarry.
	Receiver	Averaging Period	Shoulder (6:00am to 7:00am)	Day (7:00am to 6:00pm)			
	Any residence on privately owned land	L _{Aeq} (15 minutes)	37	44			
	Any classroom at Maroota Public School	L _{Aeq} (15 minutes)	-	45			
	Noise generated by the development is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. Appendix 6 sets out the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria.				Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Noise monitoring reports included in Annual reviews during the audit period indicate that noise measurements were undertaken in accordance with the <i>Noise Policy for Industry</i> (EPA, 2017) (the currently applicable guideline).
	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. <i>Note: Should an agreement with a landowner be terminated for any reason, the Applicant must comply with the noise criteria in Table 2.</i>				Compliant	ONR13-2025. ONR23-2025.	A noise agreement exists between Dixon Sand and Mr G & Mrs M Accurso dated 5 April 2004.

Table A4-1 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
NOISE (Cont'd)				
Operating Conditions				
4.	The Applicant must:			
4. (a)	construct all bunds on the eastern, south-eastern and northern sides of Lots 1 and 2 DP 547255 to at least 5m above the existing ground level;	Compliant	Observations.	Bunding on the northern side of Lots 1 and 2 has previously been constructed to at least 5m above existing ground level. Bunding on the eastern boundary of Lots 1 and 2 was under construction during the audit period (see Improvement ONR 13/25).
4. (b)	not use the bulldozer concurrently with any other plant on strips 4, 5 and 6 of Lots 1 and 2 DP 547255 for any operations at quarry depths between existing ground level and six metres below the existing ground level;	Compliant	Advice from Operations Manager	It is advised that the bulldozer has an exclusion zone (for safety reasons) and that no other equipment (including haul trucks or excavators) can operate within the same strip as the bulldozer. Therefore compliance will have been achieved.
4. (c)	only use the bulldozer for clearing, topsoil stripping and bund construction on Lots 1 and 2 DP 547255 in calm wind conditions;	Compliant	ONR13-2025 Advice from Operations Manager.	The requirement to only use the bulldozer for clearing, topsoil stripping and bund construction on Lots 1 and 2 DP 547255 in calm wind conditions is included in the NMP. It is advised that weather conditions are checked and assessed daily.
4. (d)	implement best practice management to minimise the construction, operational and road transportation noise of the development;	Compliant	ONR13-2025.	Best practice noise management and monitoring measures are outlined in the Noise Management Plan for the Quarry.
4. (e)	minimise the noise impacts of the development during meteorological conditions when the noise criteria in this consent do not apply (see Appendix 6);	Compliant	ONR13-2025 Advice from Environmental Officer.	Requirements to minimise noise impacts under various weather conditions are described in the NMP. Quarry operations are managed in accordance with daily weather forecast results and weather observations made by Quarry personnel.
4. (f)	engage an independent person/s to conduct noise monitoring at sensitive residential locations and Maroota Public School every six months, or as otherwise agreed by the Secretary, to determine whether the development is complying with the relevant conditions of this consent; and	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Noise monitoring conducted every six months during the reporting period (December 2022, June 2023, December 2023, June 2024, December 2024 and June 2025) by Hutchinson Weller Pty Ltd, a contractor commissioned by Dixon Sand to undertake environmental work for the Quarry.
4. (g)	regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this consent, to the satisfaction of the Secretary. <i>Note: Required frequency of noise monitoring may be reduced if approved by the Secretary.</i> <i>Refer to the figure in Appendix 2 for the location of the bunds and strips.</i>	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Noise monitoring data is assessed upon receipt of monitoring reports and regularly in Annual Reviews during the audit period. Quarry operations are managed to ensure compliance with relevant noise criteria, including consideration of site weather conditions and their impacts on noise emissions.

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Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
NOISE (Cont'd)				
Operating Conditions (Cont'd)				
5.	In the event that noise from the site exceeds the noise criteria in Table 2, or a negotiated agreement with landowner is terminated for any reason, then the Applicant must actively manage noise in excess of the criteria at the affected receptor. The Applicant must:	Compliant	ONR01-2025 ONR02-2025 ONR03-2025 ONR23-2025	Attended noise monitoring undertaken during the audit period did not identify exceedances of the relevant noise criteria for the Quarry. One negotiated agreement with a landowner (R1) exists for the Quarry. This agreement has not been terminated.
5. (a)	implement a reactive management system where site operations are modified in adverse weather conditions identified through meteorological monitoring;	Compliant	ONR13-2025 ONR01-2025 ONR02-2025 ONR03-2025	Reactive management measures and associated triggers are outlined in Table 5.2 of the Noise Management Plan for the Quarry. The Annual Reviews confirm that no reactive management measures or exceedances were required during the audit period. The key additional proactive management measure was the construction of the eastern bunding within Lot 1 and 2 during school holiday periods only.
5. (b)	implement additional controls or treatments on individual sources on the site, or otherwise modify operations to ensure compliance; or	Compliant		
5. (c)	provide other forms of benefit or amelioration of noise impacts agreed between the Applicant and the affected party, as providing acceptable compensation for noise levels experienced; and	Compliant		
5. (d)	identify long term strategies to eliminate noise levels that exceed the noise criteria in Table 2.	Compliant		
Noise Management Plan (NMP)				
6.	The Applicant must prepare a Noise Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	ONR13-2025. ONR76-2022.	The NMP for the Quarry was approved by the (then) DPIE on 22 October 2020.
6. (a)	be prepared in consultation with the EPA;	Compliant	ONR13-2025.	Consultation with the EPA is presented as Appendix 2 and responded to in Section 2.4 of the NMP.
6. (b)	be submitted to the Secretary for approval within 3 months of the approval of Modification 5, unless otherwise agreed by the Secretary;	Compliant	ONR13-2025. ONR37-2019.	The submission period for the NMP was extended from 17 February 2018 to 17 March 2018 following approval from DPE on 10 January 2018. The plan was submitted for approval on 19 March 2018 and resubmitted on 23 April 2018.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
NOISE (Cont'd)				
Noise Management Plan (NMP) (Cont'd)				
6. (c)	describe the measures to be implemented to ensure: - compliance with the noise criteria and operating conditions of this consent; - best practice management is being employed; and - the noise impacts of the development are minimised during meteorological conditions under which the noise criteria in this consent do not apply (see Appendix 6);	Compliant	ONR13-2025	Section 5 of the NMP describes the pro-active and reactive noise management measures necessary to ensure compliance with noise and operating conditions. Section 9 outlines responsibilities for implementing management and monitoring measures, including: - reviewing meteorological forecasts on a daily basis; - evaluating and reporting noise monitoring results; and - undertaking regular reviews of the plan.
6. (d)	describe the proposed noise management system;	Compliant	ONR13-2025	The NMP represents the noise management system for the Quarry.
6. (e)	include a noise monitoring program that: - is capable of evaluating the performance of the development; - includes a protocol for determining any exceedances of the relevant conditions of this consent; - includes a specific program to be implemented in the event that noise from the site exceeds the noise criteria in Table 2, including, as a minimum, the measures described in condition 5 above; and - effectively supports the noise management system.	Compliant	ONR13-2025	Section 6 of the Noise Management Plan 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.
	The Applicant must implement the Noise Management Plan as approved by the Secretary.	Compliant	ONR13-2025	The site currently operates in accordance with the approved NMP.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																				
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)																								
AIR QUALITY																								
Air Quality Impact Assessment Criteria																								
7.	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 or at the Maroota Public School. Table 3: Air Quality Criteria <table><tr><td>Pollutant</td><td>Averaging Period</td><td colspan="2">Criterion</td></tr><tr><td>Particulate matter < 10µm (PM₁₀)</td><td>Annual</td><td colspan="2">a,d 30µg/m³</td></tr><tr><td>Particulate matter < 10µm (PM₁₀)</td><td>24 hour</td><td colspan="2">b. 50µg/m³</td></tr><tr><td>Total Suspended particulate (TSP)</td><td>Annual</td><td colspan="2">a,d 90µg/m³</td></tr><tr><td>^c Deposited dust</td><td>Annual</td><td>^B 2 g/m²/month</td><td>^B 4 g/m²/month</td></tr></table>	Pollutant	Averaging Period	Criterion		Particulate matter < 10µm (PM ₁₀)	Annual	a,d 30µg/m ³		Particulate matter < 10µm (PM ₁₀)	24 hour	b. 50µg/m ³		Total Suspended particulate (TSP)	Annual	a,d 90µg/m ³		^c Deposited dust	Annual	^B 2 g/m ² /month	^B 4 g/m ² /month	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	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 < 10µm (PM ₁₀)	Annual	a,d 30µg/m ³																						
Particulate matter < 10µm (PM ₁₀)	24 hour	b. 50µg/m ³																						
Total Suspended particulate (TSP)	Annual	a,d 90µg/m ³																						
^c Deposited dust	Annual	^B 2 g/m ² /month	^B 4 g/m ² /month																					
Notes to Table 3: a) Cumulative impact (i.e. increase in concentrations due to the development plus background concentrations due to all other sources). b) Incremental impact (i.e. increase in concentrations due to the development alone, with zero allowable exceedances of the criteria over the life of the development. c) Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: d) Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. e) Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary.																								

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
AIR QUALITY (Cont'd)				
Operation Condition				
8.	The Applicant must:			
8. (a)	implement best practice management to minimise the dust emissions of the development;	Compliant	ONR14-2025 Observations Advice from Operations Manager and Environmental Officer.	The AQMP for the Quarry includes best practice management measures targeting the minimisation of dust emissions. Management measures including covered truck loads, spraying of exposed surfaces using a water cart, and the alarm system integrated into real time air quality monitoring systems were observed during the site inspection.
8. (b)	operate a continuous monitoring system to minimise air quality impacts at sensitive sites such as the Maroota Public School, including: - a monitoring device that is connected to an alarm system at the site; - trigger level(s) as agreed with the EPA; - procedures to cease or modify operations in the event that the trigger level(s) are reached, to ensure compliance with the criteria in condition 7 of Schedule 3, to the satisfaction of the EPA;	Compliant	ONR14-2025 Observations. Advice from Operations Manager and Environmental Officer.	A continuous air quality monitoring system, including a PM ₁₀ monitoring station and a weather station, continue to operate at the relevant monitoring locations at the Quarry. An alarm system indicates exceedances of the 37µg/m ³ 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.
8. (c)	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	ONR01-2025 ONR02-2025 ONR03-2025 ONR14-2025 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 Improvement ONR 12/25). Air quality monitoring data is reviewed regularly and has been comprehensively reviewed in the Annual Reviews during the audit period.
8. (d)	minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events (see Note d under Table 3);	Compliant	ONR14-2025 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.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
AIR QUALITY (Cont'd)				
Operation Condition (Cont'd)				
8. (e)	monitor and report on compliance with the relevant air quality conditions in this consent; and	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Air quality monitoring and compliance with relevant criteria and trigger values was reported in the Annual Reviews during the audit period.
8. (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 have generally been minimised to the greatest extent practicable whilst still supporting efficient Quarry operations. Capping of silt ponds in the southeast corner of Lot 196 and within Lot 29 are progressing. It is advised that the new bunding on the eastern limit of extraction within Lot 1 and 2 will self-seed from the adjacent vegetation. Whilst there is some evidence of self-seeding, spreading of stripped topsoil on the bund would likely result in more rapid stabilisation (Improvement ONR I6/25).
Air Quality Management Plan				
9.	The Applicant must prepare an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	ONR77-2022 ONR14-2025	The Quarry currently operates in accordance with the AQMP as approved by the (then) DPIE on 16 November 2020.
9. (a)	be prepared in consultation with the EPA;	Compliant	ONR14-2025	Appendix 2 of the AQMP contains consultation with the EPA undertaken during the preparation of the AQMP.
9. (b)	be submitted to the Secretary for approval within 3 months of the approval of Modification 5, unless otherwise agreed by the Secretary;	Compliant	ONR14-2025	DPE approved an extension of the AQMP submission date from 17 February 2018 to 17 March 2018. The AQMP was submitted to DPE on 16 March 2018 and resubmitted on 23 April 2018.
9. (c)	describe the measures to be implemented to ensure: - compliance with the air quality criteria and operating conditions of this consent; - best practice management is being employed; and - the air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;	Compliant	ONR14-2025	The AQMP includes best practice management measures, measures addressing impacts of weather conditions, and procedures to ensure the implementation of management measures.
9. (d)	describe the proposed air quality management system; and	Compliant	ONR14-2025	The AQMP outlines the air quality management system employed at the Quarry.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
AIR QUALITY (Cont'd)				
Air Quality Management Plan (Cont'd)				
9. (e)	include an air quality monitoring program that: - is capable of evaluating the performance of the development and informing day to day operational decisions; - includes a protocol for determining any exceedances of the relevant conditions of this consent; and - effectively supports the air quality management system. The Applicant must implement the Air Quality Management Plan as approved by the Secretary.	Compliant	ONR14-2025	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.
Meteorological Monitoring				
10.	For the life of the development, the Applicant must ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales guideline.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025 Observation <i>Photo E1021C_004.</i>	A weather station 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.
Greenhouse Gas Emissions				
11.	The Applicant must implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.	Compliant	ONR14-2025 Advice from Environmental Officer	The management measures targeting the minimisation of greenhouse gas emissions that are included in the AQMP have been adopted throughout the audit period.
SOIL AND WATER				
Water Supply				
12.	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. <i>Note: Under the Water Act 1912 and/or the Water Management Act 2000, the Applicant is required to obtain all necessary water licences for the development.</i>	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Annual water usage reporting indicates that operational demands remain below water allocation volumes.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
SOIL AND WATER (Cont'd)				
Water Discharges				
13.	The Applicant must comply with the discharge limits in any EPL, or with section 120 of the POEO Act.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025 ONR15-2025	No discharges occurred at LDP01 during the audit period. Procedures for controlled discharge are outlined in Section 5.1 of the WMP.
Groundwater Management				
14.	The Applicant must ensure that all bores and associated groundwater monitoring equipment for the development are maintained, and/or replaced if necessary, throughout the life of the development, to the satisfaction of DPI Water. <i>Note: MW4 may be removed immediately prior to quarrying in that area.</i>	Compliant	Observations. Advice from Environmental Officer.	Groundwater bores were installed prior to the audit period. Groundwater monitoring and extraction bores were observed to be well maintained during the site inspection. All bores inspected were numbered although the markings could be improved (see Improvement I8/25). Bores are regularly inspected in accordance with the monthly inspection checklist.
15.	Prior to commencing works associated with Modification 4, the Applicant must install additional monitoring bores within the MTSGS buffer zone within Lot 2 DP 547255 (south of MW2), including at least one deep monitoring bore that targets the regional groundwater table and at least one shallow groundwater monitoring bore. <i>Note: This condition does not establish a new requirement to undertake these actions following the approval of Modification 5. Rather, it continues the previous requirement to undertake these actions.</i>	Compliant	ONR27-2019. ONR11-2025.	Bores 8 and 9, located within the MTSGS buffer zone and shown in the Environmental Monitoring Plan, were installed on 6 August 2019.
16.	Seepage of groundwater from the MTSGS buffer zone into the quarry pit must be measured and recorded (if there is sufficient water volume to pump and measure).	Not Triggered	Advice from Environmental Officer.	Extraction has not yet commenced within the MTSGS buffer zone. It is advised that no groundwater inflows into the extraction area pit has been observed during the audit period.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
SOIL AND WATER (Cont'd)				
Groundwater Management (Cont'd)				
17.	The Applicant must ensure that groundwater in the regional groundwater source 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 DPI Water to determine the basis upon which extraction may recommence. <i>Note: Perched groundwater lenses that are above the regional groundwater source and are outside the MTSGS buffer zone may be intercepted however Water Access Licences must be held to account for all groundwater taken.</i>	Compliant	ONR15-2025.	Procedures to monitor and, if necessary, licence any groundwater seepage into the extraction area pit are outlined in the SWMP.
18.	In the event that the regional groundwater table is intercepted by any on-site dams, the Applicant must carry out remedial works, such as backfilling to the depth of the water table, to the satisfaction of the Secretary.	Not Triggered.	Advice from Environmental Officer.	On-site dams have not intercepted regional groundwater tables.
Soil and Water Management				
19.	The Applicant must consult with DPI Water prior to commencement of operations in strip 4 (as shown in the figure in Appendix 2) on Lots 1 and 2 DP 547255 and, if required, obtain a permit under the Fisheries Management Act 1994 for works to be carried out on the site.	Compliant	ONR37-2025 ONR38-2025	DPI – Fisheries were consulted by letter dated 20 May 2023 in accordance with this condition. DPI – Fisheries response 2 June 2023 confirms that no permits are required for key fish habitat etc. However, when relocating aquatic fauna from dams these may require a Section 37 Permit. Prior to relocation of aquatic fauna confirmation that the ecologists hold the correct permitting for both aquatic fauna and turtles is required (see Improvement 19/25).
20.	The Applicant must prepare a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	ONR15-2025 ONR78-2022	The Quarry currently operates in accordance with a SWMP dated November 2020 and approved by the (then) DPIE on 16 November 2020.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
SOIL AND WATER (Cont'd)				
Soil and Water Management (Cont'd)				
20. (a)	be prepared by a suitably qualified and experienced person/s approved by the Secretary;	Compliant	ONR15-2025	A DPE endorsement letter is included as Appendix 2 of the SWMP.
20. (b)	be prepared in consultation with the EPA and DPI Water;	Compliant	ONR15-2025	Consultation with the EPA and DPI Water is included as Appendix 2 of the SWMP.
20. (c)	be submitted to the Secretary for approval within 3 months of the approval of Modification 5, unless otherwise agreed by the Secretary; and include a:	Compliant	ONR15-2025 ONR37-2019 Advice from Environmental Officer.	Submission date extension from 17 February 2018 to 17 March 2018 confirmed in letter from DPE dated 10 January 2018. The SWMP was submitted for approval on 16 March 2018 and resubmitted on 27 April 2018.
20. (d) (i)	Site Water Balance that includes: - details of: - sources and security of water supply; - water use and management on site; - any off-site water transfers; and - reporting procedures; and - measures to be implemented to minimise clean water use on site.	Compliant	ONR15-2025	Section 4 of the SWMP outlines the Quarry water balance while Section 5 details discharges and reporting procedures. It is noted that water for use in dust suppression and processing are wholly met by water captured within the Quarry. Therefore, the minimisation of the volume of clean water from upslope acts to minimise the volume of clean water used on site.
20. (d) (ii)	Surface Water Management Plan, that includes: a program for obtaining detailed baseline data on surface water flows and quality in water bodies that could potentially be affected by the development;	Compliant	ONR15-2025	Section 5.1.2.1 of the SWMP details the monitoring program for receiving waters.
	- a detailed description of the surface water management system on site including the: - clean water diversion system; - erosion and sediment controls; - dirty water management system; and - water storages; and	Compliant	ONR15-2025	The surface water management system is described in Section 3 of the SWMP. See Improvement ONR Ij/2025 .

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
SOIL AND WATER (Cont'd)				
Soil and Water Management (Cont'd)				
20. (d) (ii) Cont'd	- a program to monitor and report on: - any surface water discharges; - the effectiveness of the water management system; - the quality of water discharged from the site to the environment; and - surface water flows and quality in local watercourses; and	Compliant	ONR15-2025	Monitoring and reporting procedures are outlined in Section 5.1 of the SWMP.
20. (d) (iii)	Groundwater Management Plan that includes: detailed management measures to ensure that quarrying operations, other than monitoring bores, do not intercept the highest recorded wet weather groundwater level within the MTSGS buffer zone and/or the regional groundwater table within the Sydney Basin Central Groundwater Source;	Compliant	ONR15-2025	Measures concerning extraction depth monitoring and management are detailed in Section 5.2 of the SWMP.
	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	Compliant	ONR15-2025	Section 6.2 includes monitoring measures and a protocol to obtain appropriate licencing in the event that groundwater inflows exceed licenced volumes.
	- a monitoring program to manage potential impacts, if any, on any alluvium and associated surface water source near the proposed extraction area that includes: - identification of a methodology for determining threshold water level criteria; - contingency measures in the event of a breach of thresholds; and - a program to regularly report on monitoring. The Applicant must implement the Soil and Water Management Plan as approved by the Secretary.	Compliant	ONR15-2025	Sections 5.2 and 6.2 detail monitoring and reporting procedures as well as a trigger action response plan to be implemented in the event that water quality results exceed trigger values.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
TRANSPORT				
Monitoring of Product Transport				
21.	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 records on its website every 6 months.	Non-compliant	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. This record includes times for entry of unladen trucks and exit time of laden trucks. 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 Recommendation ONR R4/25 . The 6-monthly summary of laden truck movement records are published on the Dixon Sand website.
Operating Conditions				
22.	The Applicant must:			
22. (a)	advise its drivers and its clients not to arrive at the site prior to 5:45 am on any day;	Compliant	ONR06-2022. Observations.	Driver requirements are outlined in the Site Traffic Management Plan: Maroota, which forms Appendix 3 of the TMP, and during driver inductions. Vehicles were observed with covered loads during the site inspection and no vehicles with loose material with the potential to fall from vehicles were observed during the site inspection. Areas where trucks can pull over to check load covers and remove any loose material are also available prior to trucks exiting the site.
22. (b)	ensure that all laden trucks have their loads covered when arriving at or leaving the site;	Compliant		
22. (c)	ensure that all laden trucks are cleaned of material that may fall from vehicles, before leaving the site; and	Compliant		
22. (d)	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	ONR06-2022.	The requirement to display appropriate truck signage (registration plate, branding, identification features) is outlined in Section 5 of the TMP. The bulk of the trucks travelling to and from the ONR Quarry include ownership/corporate details on the exterior of the truck and/or trailers.

Table A4-1 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
TRANSPORT (Cont'd)				
Transport Management Plan				
23.	The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	ONR06-2022 ONR79-2022	The site currently operates in accordance with TMP dated November 2020 and approved by the (then) DPIE on 16 November 2022.
23. (a)	be prepared in consultation with the RMS and Council;	Compliant	ONR06-2022	Consultation with RMS and Hills Shire Council is presented as Appendix 2 of the TMP.
23. (b)	be submitted to the Secretary for approval within 3 months of the approval of Modification 5, unless otherwise agreed by the Secretary;	Compliant	ONR06-2022. ONR37-2019. Advice from Environmental Officer.	Extension of the submission date from 17 February to 17 March 2018 was granted by DPE on 10 January 2019. The TMP was submitted for approval on 16 March 2018 and resubmitted on 23 April 2018.
23. (c)	describe the processes in place to control the arrival and dispatch of trucks;	Compliant	ONR06-2022	Section 5 of the TMP details traffic management controls for the Quarry.
23. (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 the Maroota Public School;	Compliant	ONR06-2022	Section 4 of the TMP outlines the Drivers Code of Conduct, detailing expected safe and quiet driving practices.
23. (e)	describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct;	Compliant	ONR06-2022	Measures to ensure compliance with the Drivers Code of Conduct are outlined in Section 4.2 of the TMP. See Improvement Ik/2025.
23. (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. 8.30 am – 9.00 am and 3.00 pm – 3.30 pm); and	Compliant	ONR06-2022	Management measures concerning movement and route restrictions with specific regard for school and holiday periods are outlined in Section 5 of the TMP.
23. (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.	Compliant	ONR06-2022	Measures to minimise dust and material tracking are outlined in Section 5 of the TMP.
	The Applicant must implement the approved Traffic Management Plan as approved by the Secretary.	Compliant	ONR06-2022	The Quarry operates in accordance with the approved TMP.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions						
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)										
ABORIGINAL HERITAGE										
24.	If any suspected object or place of Aboriginal heritage significance is identified on site, the Applicant must ensure that:	Not Triggered	ONR07-2025	No Aboriginal sites have been identified within the Quarry site. An Unexpected Archaeological Finds protocol is included as Section 9 of the EMS.						
24. (a)	all work in the immediate vicinity of the suspected Aboriginal object or place ceases immediately;									
24. (b)	a 10m buffer area around the suspected Aboriginal object or place is cordoned off; and									
24. (c)	the OEH 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.									
BIODIVERSITY AND REHABILITATION										
Biodiversity Offset Strategy										
25.	The Applicant must:	Compliant	ONR16-2025 ONR01-2025 ONR02-2025 ONR03-2025	The biodiversity offset strategy for the Native Vegetation Corridor and Haerses Road Biodiversity Offset Area are outlined in the BRMP for the Quarry. Details of rehabilitation and weed control activities undertaken during the audit period are provided in annual bush regeneration reports and biodiversity and rehabilitation management reports included in the Annual Reviews.						
25. (a)	implement the Biodiversity Offset Strategy (see Table 4); Table 4: Biodiversity Offset Strategy									
	<table><tr><th>Offset Areas</th><th>Minimum Size</th></tr><tr><td>Native Vegetation Corridor (on-site), as shown conceptually in Appendix 1.</td><td>6.83 hectares</td></tr><tr><td>Haerses Road Biodiversity Offset Area (off-site)</td><td>8.70 hectares</td></tr></table>				Offset Areas	Minimum Size	Native Vegetation Corridor (on-site), as shown conceptually in Appendix 1.	6.83 hectares	Haerses Road Biodiversity Offset Area (off-site)	8.70 hectares
Offset Areas	Minimum Size									
Native Vegetation Corridor (on-site), as shown conceptually in Appendix 1.	6.83 hectares									
Haerses Road Biodiversity Offset Area (off-site)	8.70 hectares									
25. (b)	ensure that adequate resources are dedicated towards the implementation of this strategy;	Compliant	Advice from Environmental Officer. ONR16-2025	Proposed terms for a Public Positive Covenant were submitted by Dixon Sand to DPIE on 24 August 2019 and a response is awaited. Monitoring and management activities associated with the Biodiversity Offset Area commenced in July 2015.						
25. (c)	provide appropriate long term security for the Haerses Road Biodiversity Offset Area; and	Non-compliant	Advice from Environmental Officer. ONR25-2025 ONR26-2025	Proposed terms for a Public Positive Covenant were originally submitted by Dixon Sand to DPIE on 24 August 2019. Further follow up occurred since that time with Dixon Sand subsequently submitted the draft terms of the Public Positive Covenant instrument via the Major Project Portal 17 July 2024. This remains subject to considerations / assessment by DPHI with no response received as at the time of the audit. See Recommendation ONR R5/25.						

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BIODIVERSITY AND REHABILITATION (Cont'd)				
Biodiversity Offset Strategy (Cont'd)				
25. (d)	provide a timetable for the implementation of the offset strategy by the end of June 2016, or as otherwise agreed by the Secretary, to the satisfaction of the Secretary.	Compliant	ONR16-2025	A timetable for the implementation of the Native Vegetation Corridor component of the offset strategy is provided in Section 7 of the BRMP. Completion criteria for the Haerses Road Biodiversity Offset Area component of the strategy are provided in Appendix 3 of the BRMP. These criteria are effectively ongoing performance indicators. The strategy provides timing for management actions and monitoring which remain ongoing during the Project life.
	"Prior to 30 September 2015, the Applicant must confirm the boundary of the Haerses Road Biodiversity Offset Area to the satisfaction of the Secretary. No vegetation clearing is to occur within the expanded extraction area within Lot 2 DP 547255 approved under Modification 4 until the Secretary's approval for the boundary of the Haerses Road Biodiversity Offset Area is obtained. <i>Note: For the purposes of this consent suitable arrangements may include the use of Public Positive Covenants in combination with Restrictions in Use of Land on the land titles of the Offset Area. Other arrangements such as dedication of land under the National Parks and Wildlife Act 1974, Trust Agreements under the Nature Conservation Trust Act 2001 or a Property Vegetation Plan registered on title under the Native Vegetation Act 2003 would be considered for their suitability by the Secretary. "</i>	Compliant	2016 Independent Environmental Audit.	A survey of the HRBOA boundary was conducted by McKinley Morgan and Associates in September 2015 and the survey plans were submitted to DPE on 29 September 2015.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions						
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)										
BIODIVERSITY AND REHABILITATION (Cont'd)										
Rehabilitation Objectives										
26.	The Applicant must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the conceptual final landform in Appendix 5 and must comply with the objectives in Table 5. <i>Table 5: Rehabilitation Objectives</i> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>All areas of the site affected by the development</td><td> • Safe • Hydraulically and geotechnically stable • Non-polluting • Fit for the intended final land use(s) • Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land • Landscaped and vegetated using native tree and understorey species or agricultural species in accordance with the Biodiversity and Rehabilitation Management Plan </td></tr><tr><td>Surface infrastructure</td><td> • Decommissioned and removed, unless otherwise agreed by the Secretary </td></tr></table>	Feature	Objective	All areas of the site affected by the development	• Safe • Hydraulically and geotechnically stable • Non-polluting • Fit for the intended final land use(s) • Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land • Landscaped and vegetated using native tree and understorey species or agricultural species in accordance with the Biodiversity and Rehabilitation Management Plan	Surface infrastructure	• Decommissioned and removed, unless otherwise agreed by the Secretary	Compliant	ONR16-2025	Rehabilitation at the Quarry site to date has been undertaken in accordance with the BRMP and has included revegetation using native tree and understorey species as well as the preparation of stable final landform areas (e.g. a portion of Lot 196 DP 752025).
Feature	Objective									
All areas of the site affected by the development	• Safe • Hydraulically and geotechnically stable • Non-polluting • Fit for the intended final land use(s) • Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land • Landscaped and vegetated using native tree and understorey species or agricultural species in accordance with the Biodiversity and Rehabilitation Management Plan									
Surface infrastructure	• Decommissioned and removed, unless otherwise agreed by the Secretary									
Progressive Rehabilitation										
27.	"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. <i>Note: It is accepted that parts of the site that are progressively rehabilitated may be subject to future re-disturbance.</i>	Compliant	ONR16-2025 Observations.	Progressive rehabilitation has been undertaken at the Quarry where practicable to reduce the area of exposed surfaces.. It is advised that the new bunding on the eastern limit of extraction within Lot 1 and 2 will self-seed from the adjacent vegetation. Whilst there is some evidence of self-seeding, spreading of stripped topsoil on the bund would likely result in more rapid stabilisation (Improvement ONR I6/25).						
Riparian Management										
28	The Applicant must establish a riparian zone, revegetated with local native species, along the entire length of the reconstructed ephemeral waterway on the site. The riparian zone shall be no less than 20m wide measured horizontally and at right angles to the flow from the top of both banks. No exotic plant species, other than sterile cover crops, are to be planted in the riparian zone.	Not Triggered	Advice from Environmental Officer Observation.	The riparian zone has not yet been established as final rehabilitation and reconstruction of the ephemeral waterway within Lot 2 547255 has not yet commenced.						

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BIODIVERSITY AND REHABILITATION (Cont'd)				
Biodiversity and Rehabilitation Management Plan				
29	The Applicant must prepare a Biodiversity and Rehabilitation Management Plan for the development to the satisfaction of the Secretary. This plan must:	Compliant	ONR16-2025 ONR80-2022	The site currently operates in accordance with the BRMP dated November 2020 as approved by the (then) DPIE on 16 November 2020.
29 (a)	be prepared by a suitably qualified expert;	Compliant	ONR16-2025	Prepared by Alison Riley of Umwelt - Alison Riley (Umwelt NSW Ecology Manager).
29 (b)	be prepared in consultation with OEH and Council;	Compliant	ONR16-2025	Consultation with OEH and Hills Shire Council is presented as Appendix 2 of the BRMP.
29 (c)	be submitted to the Secretary for approval within 3 months of the approval of Modification 5, unless otherwise agreed by the Secretary;	Compliant	ONR16-2025 ONR37-2019 Advice from Environmental Officer.	Extension of the submission date from 17 February to 17 March 2018 was granted by DPE on 10 January 2019. The BRMP was submitted for approval on 16 March 2018 and resubmitted on 23 April 2018.
29 (d)	provide details of the conceptual final landform and associate final land use(s) for the site;	Compliant	ONR16-2025	Conceptual final landform and land use detailed in Sections 5.3 and 5.4 of the BRMP.
29 (e)	describe how the implementation of the Biodiversity Offset Strategy will be integrated with the overall rehabilitation of the site;	Compliant	ONR16-2025	The BRMP details the integration of the Riparian Vegetation Corridor offset component into the broader Quarry site through integrated management and monitoring approaches. A conceptual final landform including this area is provided in Figure 5.1. The Haerses Road Biodiversity Offset Area is located adjacent to a separate Quarry site, the Haerses Road Quarry, and will therefore be integrated into the final landform for that site.
29 (f)	"describe the short, medium and long term measures to be implemented to: - manage remnant vegetation and habitat on site, including within the Biodiversity Offset Strategy area; and - ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this consent;"	Compliant	ONR16-2025	Section 6 of the BRMP details remnant vegetation and habitat management measures and measures targeting compliance with rehabilitation objectives. Section 7 provides an indication of the rehabilitation staging timeframe.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BIODIVERSITY AND REHABILITATION (Cont'd)				
Biodiversity and Rehabilitation Management Plan (Cont'd)				
29 (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: establishment and maintenance of the riparian zone required under condition 29 above;	Compliant	ONR16-2025	Actions concerning the establishment and maintenance of the riparian zone over the next 3 years are outlined in Section 7.2. See Improvement ONR I12/25 .
	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;	Compliant	ONR16-2025	Actions concerning the salvage of environmental resources over the next 3 years are outlined in Section 7.2.
	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;	Compliant	ONR16-2025	Actions concerning the restoration and enhancement of native vegetation and habitat over the next 3 years are outlined in Section 7.2.
	protecting vegetation and fauna habitat outside the approved disturbance area on-site;	Compliant	ONR16-2025	Actions concerning the protection of vegetation and habitat over the next 3 years are outlined in Section 7.2.
	minimising the impacts on native fauna, including undertaking pre-clearance surveys and avoiding clearing activities during sensitive hibernation and breeding periods;	Compliant	ONR16-2025	Actions concerning the minimisation of impacts on native fauna over the next 3 years are outlined in Section 7.2.
	establishing vegetation screening to minimise the visual impacts of the site on surrounding receivers;	Compliant	ONR16-2025	Actions concerning the establishment of vegetation screens over the next 3 years are outlined in Section 7.2.
	ensuring minimal environmental consequences for threatened species, populations and habitats;	Compliant	ONR16-2025	Actions concerning the minimisation of consequences for threatened species, populations and habitats over the next 3 years are outlined in Section 7.2.
	collecting and propagating seed;	Compliant	ONR16-2025	Actions concerning the collection and propagation of seeds over the next 3 years are outlined in Section 7.2.
	controlling weeds and feral pests;	Compliant	ONR16-2025	Actions concerning the control of weed and pest species over the next 3 years are outlined in Section 7.2.
	controlling erosion; and	Compliant	ONR16-2025	Actions concerning control of erosion over the next 3 years are outlined in Section 7.2.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BIODIVERSITY AND REHABILITATION (Cont'd)				
Biodiversity and Rehabilitation Management Plan (Cont'd)				
29 (g) Cont'd	managing bushfire risk;	Compliant	ONR16-2025	Actions concerning the management of bushfire risk over the next 3 years are outlined in Section 7.2.
29 (h)	include a program to monitor the effects of the development on flora and fauna, including known populations of <i>Tetratheca glandulosa</i> , <i>Melaleuca deanei</i> , <i>Darwinia fascicularis subsp. oligantha</i> , and <i>Kunzea rupestris</i> on the site, including annual surveys of any threatened species for the duration of quarrying operations;	Compliant	ONR16-2025	Appendix 5 of the BRMP provides a flora and fauna monitoring program. This program has been followed and reported upon in the respective Annual Reviews.
29 (i)	include a specific program to translocate, propagate, and revegetate threatened plant species on the site including <i>Melaleuca deanei</i> , <i>Darwinia Fascicularis susp. oligantha</i> , and <i>Kunzea rupestris</i> , to be implemented under the direction of a qualified ecologist;	Compliant	ONR16-2025	Section 6.5 of the BRMP details the translocation and propagation program for threatened plant species. The mother plant of <i>Melaleuca deanei</i> was translocated to the VCN in June 2022.
29 (j)	include detailed performance and completion criteria for evaluating the performance of the translocation program in paragraph (i), the Biodiversity Offset Strategy and the rehabilitation of the site (including progressive rehabilitation), including triggers for any necessary remedial action;	Compliant	ONR16-2025	Performance and completion criteria for the translocation program are detailed in Section 6.5.6 of the BRMP and Section 3 of Appendix 5 of the BRMP.
29 (k)	include a program to monitor and report on the effectiveness of the measures described in paragraphs (f), (g) and (i), and progress against the performance and completion criteria;	Compliant	ONR16-2025	Monitoring and reporting procedures are outlined in Sections 8 and 9 of the BRMP. The Annual Reviews prepared during the audit period document the results of the monitoring program.
29 (l)	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	ONR16-2025	Potential risks and corrective management actions are identified in Section 11 of the BRMP.
29 (m)	include details of who is responsible for monitoring, reviewing, and implementing the plan.	Compliant	ONR16-2025	Section 12 of the BRMP outlines accountabilities for monitoring, reviewing and implementing the BRMP.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BIODIVERSITY AND REHABILITATION (Cont'd)				
Biodiversity and Rehabilitation Bond				
30.	"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	Compliant	ONR49-2019 ONR50-2019 ONR51-2019 ONR52-2019 ONR56-2022	Confirmation of the Biodiversity and Rehabilitation Bond calculation was provided by DPE on 25 October 2018. The funds for the bond were provided to DPE on 1 November 2018.
30. (a)	calculating the full cost of implementing the Biodiversity Offset Strategy;			
30. (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			
30. (c)	employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary. <i>Notes:</i> <i>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.</i> <i>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</i> <i>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.</i>	-	-	Noted.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BIODIVERSITY AND REHABILITATION (Cont'd)				
Biodiversity and Rehabilitation Bond (Cont'd)				
30. (c) Cont'd	- 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. - 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. "			
31	The Biodiversity and Rehabilitation Bond must be reviewed and (if required), an updated bond must be lodged with the Department within 3 months following:	Compliant	ONR27-2025	The Rehabilitation Bond was reviewed following the November 2020 update of the BRMP and notification of this review was provided to the (then) DPIE on 10 February 2021. The review indicated no amendment to the Rehabilitation Bond was required.
31 (a)	an update or revision to the Biodiversity and Rehabilitation Management Plan;			
31 (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	-	Whilst the 2022 IEA made a recommendation relating to the implementation of the Biodiversity Offset Strategy this recommendation was administrative in nature, to follow up approval of the Positive Public Covenant by the Department, and did not involve any changes to the quantum of the offset or bond.
31 (c)	in response to a request by the Secretary.	Not Triggered	-	No request received from the Secretary.
VISUAL				
32	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	ONR16-2025	Outlined in Section 6.3.6 of the BRMP.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
WASTE				
33	The Applicant must:			
33 (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.	Installation of existing on-site sewage treatment facilities was carried out prior to the audit period. A site inspection undertaken by the EPA in 2016 did not raise any issues concerning sewage treatment.
33 (b)	minimise the waste generated by the development;	Compliant	Observations. Advice from Environmental Officer.	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 bins for general waste and recycling were sighted during the site inspection.
34	Except as expressly permitted in an EPL, the Applicant must not receive waste on the site for storage, treatment, processing, reprocessing or disposal.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025 Advice from Environmental officer.	Annual Reviews for 2022/2023, 2023/2024 and 2024/2025 states that no waste is permitted to be received on site. No waste was received at the Quarry during the audit period.
LIQUID STORAGE				
35	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	Observations.	Oil drums stored within a dedicated hydrocarbon storage area in the site workshop area and the diesel fuel tank and waste oil tanks were appropriately bunded.
DANGEROUS GOODS				
36	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	Observations.	The storage, handling and transport of dangerous goods within the Quarry site was generally observed to have been conducted in accordance with the relevant standards.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS (Cont'd)				
BUSHFIRE				
37	The Applicant must:			
37 (a)	ensure that the development is suitably equipped to respond to any fires on site; and	Compliant	Observations. Sighted Fire Extinguisher service records. Advice from Managing Director.	Fire extinguishers provided at various locations throughout the Quarry site and maintained regularly (per service labels on extinguishers). The water cart is equipped to support firefighting operations, if required.
37 (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	Advice from Environmental Officer.	The Quarry is equipped with watercart and Storz fitting which can assist RFS appliance during water draughting and tank filling. These features were required by Emergency Services or the RFS during the audit period. The Quarry Management participate in annual 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.
PUBLIC SAFETY				
38	The Applicant must implement appropriate measures, in consultation with DRG and Maroota Public School, to ensure public safety and restrict unsupervised access of school children to the quarry site. Those measures must include the erection of safety fencing around the highwall of the quarry or at the school boundary as well as the fencing referred to in condition 16 of Schedule 2.	Compliant	Observations. Advice from Managing Director.	Fencing of the Maroota Public School boundary was completed by Maroota Public School prior to 2016 following consultation with DRG and Dixon Sand.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 4 – ADDITIONAL PROCEDURES				
Notification of Landowners				
1	As soon as practicable, and no longer than 7 days, after obtaining monitoring results showing:			
1 (a)	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	ONR1-2025 ONR2-2025 ONR3-2025	No noise exceedances were recorded during the audit period and no Quarry-related exceedances of air quality criteria were recorded during the audit period.
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).	Not Triggered	ONR1-2025 ONR2-2025 ONR3-2025	No Quarry-related exceedances of air quality criteria were recorded during the audit period.
Independent Review				
2	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. 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. 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:	Not Triggered	-	No landowner requested an independent review of impacts associated with the Quarry during the audit period.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 4 – ADDITIONAL PROCEDURES				
Independent Review (Cont'd)				
2 (a)	commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Secretary, to: - consult with the landowner to determine his/her concerns; - conduct monitoring to determine whether the development is complying with the relevant criteria in Schedule 3; and - if the development is not complying with these criteria, then identify measures that could be implemented to ensure compliance with the relevant criteria; and			
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.			
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
ENVIRONMENTAL MANAGEMENT				
Environmental Management Strategy				
1	The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	Compliant	ONR07-2025 ONR81-2022	The site currently operates in accordance with the EMS dated February 2024 and approved by DPHI 13 March 2024.
1 (a)	be submitted to the Secretary for approval within 3 months of the approval of Modification 5;	Compliant	ONR37-2019 ONR53-2019 ONR81-2022 Advice from Environmental Officer.	The original EMS was submitted to DPE on 16 February 2018. The EMS was resubmitted to DPE on 31 May 2018 following comments from DPE. The EMS was approved on 31 May 2018.
1 (b)	provide the strategic framework for environmental management of the development;	Compliant	ONR07-2025	The EMS provides the strategic framework for the Quarry.
1 (c)	identify the statutory approvals that apply to the development;	Compliant	ONR07-2025	Section 2 of the EMS outlines the statutory approvals applicable to the Quarry.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Environmental Management Strategy (Cont'd)				
1 (d)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Compliant	ONR07-2025	Section 4 of the EMS identifies management roles and responsibilities for key Quarry personnel.
1 (e)	describe the procedures to be implemented to: - keep the local community and relevant agencies informed about the operation and environmental performance of the development; - receive, record, handle and respond to complaints; - resolve any disputes that may arise during the course of the development; - respond to any non-compliance; - respond to emergencies; and	Compliant	ONR07-2025	Sections 7, 8 and 11 of the EMS provide descriptions of reporting, complaints handling, dispute resolution, non-compliance response and emergency response procedures.
1 (f)	include a Community Relations Plan, developed in consultation with Council, the CCC, and the Maroota Public School, which includes: - identification of stakeholders potentially affected by the development; - detailed strategies to ensure open communication between the Applicant, the community and Maroota Public School; - detailed strategies to monitor and evaluate social impacts of the development on the local community and Maroota Public School; and - measures to improve community relations including: - quarry open days and education sessions to promote better understanding of quarry operations in the wider community; - participation in community activities; and - strategies involving in-kind exchanges of expertise and resources for activities such as bush regeneration, Landcare, Streamwatch, and other community-based environmental programs;	Compliant	ONR17-2025	The Community Relations Plan (included as Appendix 11 of the EMS) identifies relevant stakeholders, details communication strategies and outlines social impact monitoring strategies. Sections 3.2.2 and 4 detail measures to improve community relations including open days, participation in community events, and cooperation with community groups.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Environmental Management Strategy (Cont'd)				
1 (g)	include: - copies of any strategies, plans and programs approved under the conditions of this consent; and - a clear plan depicting all the monitoring to be carried out under the conditions of this consent.	Compliant	ONR07-2025 ONR11-2025	All strategies, plans and programs are included as appendices to the EMS. Monitoring is detailed in each plan under the EMS, with monitoring locations depicted in the Environmental Monitoring Plan (Appendix 4).
	The Applicant must implement any Environmental Management Strategy as approved by the Secretary.	Compliant	ONR07-2025	The site currently operates in accordance with the EMS dated February 2024.
Evidence of Consultation				
2	Where consultation with any State or local agency is required by the conditions of this consent, the Applicant must:	Compliant	ONR07-2025 ONR13-2025 ONR14-2025 ONR15-2025	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;			
2 (b)	submit evidence of this consultation as part of the relevant document;	Compliant	ONR06-2022 ONR16-2025 ONR17-2025	
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		
Management Plan Requirements				
3	The Applicant must ensure that the management plans required under this consent are prepared in accordance with any relevant guidelines, and include:	Compliant	ONR08-2025 ONR07-2025 ONR13-2025	Plans contain all identified components, where relevant. Appendix 1 of the EMS provides a Plan Preparation Checklist and Certification confirming plan component inclusion.
3 (a)	detailed baseline data;	Compliant	ONR14-2025	
3 (b)	"a description of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions); - any relevant limits or performance measures/criteria; and - 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;"	Compliant	ONR15-2025 ONR06-2022 ONR16-2025 ONR17-2025	

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Management Plan Requirements (Cont'd)				
3 (c)	a description of the measures that to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;	Compliant		
3 (d)	a program to monitor and report on the: - impacts and environmental performance of the development; and - effectiveness of any management measures (see (c) above);	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		
3 (f)	a program to investigate and implement ways to improve the environmental performance of the development over time;	Compliant		
3 (g)	a protocol for managing and reporting any: - incidents; - complaints; - non-compliances with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and	Compliant		
3 (h)	a protocol for periodic review of the plan. <i>Note: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	Compliant		
Application of Existing Strategies, Plans and Programs				
4	The Applicant must continue to apply existing management plans, strategies or monitoring programs approved prior to the approval of Modification 5, until the approval of a similar plan, strategy or program following the approval of Modification 5.	Compliant	Advice from Environmental Officer. Observations.	The Quarry is managed in accordance with approved management plans.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Revision of Strategies, Plans & Programs				
5	Within 3 months of the submission of an:	Non-compliant	ONR39 to 40-2025 Advice from Environmental Officer.	Management strategies and plans were reviewed within the applicable timeframes following submission of the 2021/2022, 2022/2023 and 2023/2024 Annual Reviews. The period for review following submission of the 2024/2025 Annual Review had not elapsed during the audit period. Management strategies and plans were reviewed within the applicable timeframes following submission of the 2022 IEA. No Modifications to the consent were made during the audit period. During the audit period a total of 29 'incident' reports were submitted during the audit period. Of these 26 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. Review of the plans was formally submitted on one occasion (in conjunction with the review triggered by the Annual Review). Incident reports from 11 June 2024 onwards include a note that the AQMP was under review and revision in consultation with EPA. It is advised that no updates to the other management plans were required. See Recommendation ONR R6/25 and Improvement ONR I13/25 .
5 (a)	incident report under condition 10 below;			
5 (b)	Annual review under condition 12 below;			
5 (c)	Independent Environmental Audit report under condition 14 below; and	Compliant		
5 (d)	any modifications to this consent, 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.	Not Triggered		
	<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>	-	-	Noted.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Updating and Staging of Strategies, Plans and Programs				
6	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. 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. 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. 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.	-	-	Noted.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Adaptive Management				
7	The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and/or performance measures in Schedule 3. Any exceedance of these criteria and/or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria and/or performance measures has occurred, the Applicant must as soon as becoming aware of any exceedance:	Not Triggered	ONR1-2025 ONR2-2025 ONR3-2025	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 reoccur;	Not Triggered		
7 (b)	consider all reasonable and feasible options for remediation (where relevant);	Not Triggered		
7 (c)	within 14 days of the exceedance occurring, submit a report to the Secretary describing these remediation options and any preferred remediation measures or other course of action; and	Not Triggered		
7 (d)	implement remediation measures as directed by the Secretary; to the satisfaction of the Secretary.	Not Triggered		
Community Consultative Committee				
8	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 10 October 2018 and operated in general accordance with the Department's Community Consultative Committee Guidelines, November 2016 (or later version).	Compliant	ONR41-2019.	Approval from DPE on 1 March 2018 to maintain the existing CCC arrangement.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Community Consultative Committee (Cont'd)				
8 Cont'd	<i>Notes:</i> <i>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this consent.</i> <i>In accordance with the guidelines, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council and the local community.</i> <i>The CCC established and operated prior to the approval of Modification 5 must continue to be operated in accordance with the procedures required by the consent prior to the approval of Modification 5 until such time as the CCC required by this condition is established.</i>			
Reporting				
Incident Reporting				
9	The Applicant must immediately notify the Secretary (using the contact name, email address and phone number provided by the Department from time to time) and any other relevant agencies of any incident.	Non-compliant	ONR43-2025 Advice from Environmental Officer.	During the audit period a total of 29 'incident' reports were submitted 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 26 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. Recommendation ONR R7/25.

Table A4-1 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Reporting (Cont'd)				
Incident Reporting (Cont'd)				
10	Within 7 days of the date of the incident, the Applicant must provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested. This report must include the time and date of the incident, details of the incident, measures implemented to prevent re-occurrence and must identify any non-compliance with this consent.	Not Determined	As above	The date from which the Company became aware of each 'incident' is not recorded within the incident reports (Recommendation ONR R7/25).
Regular Reporting				
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	Regular reporting is provided on the Company's website for environmental monitoring, complaints and truck movements. Copies of Annual Reviews and other relevant reports are also published.
Annual Review				
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	ONR28-2025 ONR01-2025 ONR02-2025 ONR03-2025	Dixon Sand has received approval from DPE to submit Annual Reviews by 30 September each year (letter dated 9 February 2018). Annual Reviews during the audit period (2022/2023, 2023/2024 and 2024/2025) were submitted by 30 September each year.
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		Annual reviews during the audit period describe development and rehabilitation activities during the reporting period as well as proposed activities during the next reporting period.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Reporting (Cont'd)				
Annual Review (Cont'd)				
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: • relevant statutory requirements, limits or performance measures/criteria; • requirements of any plan or program required under this consent; • monitoring results of previous years; and • relevant predictions in the documents listed in condition 2(a) of Schedule 2;	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: • the effectiveness of the air quality and noise management systems; and • compliance with the performance measures, criteria and operating conditions in this consent.	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.
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;	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.

Table A4-1 (Cont'd)
Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Reporting (Cont'd)				
Independent Environmental Audit				
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	Previous IEA commenced in October 2019. Previous 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	Appendix 1	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.
13 (b)	include consultation with the relevant agencies and the CCC;	Compliant	Appendix 3 of this Audit	Consultation for the audit was undertaken with DPE, BCD, EPA, NRAR, TfNSW, RR, HSC and CCC.
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	This Audit	
13 (d)	review the adequacy of strategies, plans or programs required under the abovementioned approvals;	Compliant	This Audit	
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	This Audit	
13 (f)	be conducted and reported to the satisfaction of the Secretary.	Not Triggered	This Audit	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		The 2022 IEA was submitted to the (then) DPIE on 16 January 2023, within 12 weeks following the commencement of the 2022 IEA. Submission of this audit and response to the recommendations will occur following the finalisation of this audit.

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Compliance Review – Development Consent DA 250-09-01

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING (Cont'd)				
ENVIRONMENTAL MANAGEMENT (Cont'd)				
Reporting (Cont'd)				
Access to Information				
15	Within 3 months of the approval of Modification 5, until the completion of all works, including rehabilitation and remediation the Applicant must:	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 (a)	make the following information publicly available on its website: - the documents listed in condition 2(a) of Schedule 2; - current statutory approvals for the development; - all approved strategies, plans and programs required under the conditions of this consent; - a comprehensive summary of the monitoring results of the development, reported in accordance with the specifications in any conditions of this consent, or any approved plans and programs; - a complaints register, updated monthly; - the annual reviews of the development; - any independent environmental audit as described in condition 13 above, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and	Compliant		
15 (b)	keep this information up-to-date, to the satisfaction of the Secretary.	Compliant		The information on the Dixon Quarry Group website is generally up to date as required. Comprehensive summaries of all monitoring results are provided as part of the Annual Reviews. Summaries of PM ₁₀ data are also provided monthly (see suggested Improvement ONR I7/25

Table A4-2
Compliance Review – EPL 3916 (Version 1 March 2021)

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions									
1 ADMINISTRATIVE CONDITIONS													
A1 What the licence authorises and regulates													
A1.1	This licence authorises the carrying out of the scheduled activities listed below at the premises specified in A2. The activities are listed according to their scheduled activity classification, fee-based activity classification and the scale of the operation. Unless otherwise further restricted by a condition of this licence, the scale at which the activity is carried out must not exceed the maximum scale specified in this condition. <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Crushing, grinding or separating</td><td>Crushing, grinding or separating</td><td>> 100000 - 500000 T annual processing capacity</td></tr><tr><td>Extractive activities</td><td>Extractive activities</td><td>> 100000 - 500000 T annually extracted or processed</td></tr></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	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	During the audit period production remained within the approved limit. – 2022/2023 = 357,066.28t – 2023/2024 = 243,043.70t – 2024/2025 = 244,976.63t
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											
A1.2	Notwithstanding A1.1, the scale of the extractive activities authorised under this licence must not exceed 495,000 tonnes per annum, being the combined production of quarry products from the site, including extractive material sourced from the Haerses Road Sand Quarry as approved by the development consent granted under the <i>Environmental Planning and Assessment Act 1979</i> for the premises specified in A2.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	During the audit period production remained within the approved limit. – 2022/2023 = 357,066.28t – 2023/2024 = 243,043.70t – 2024/2025 = 244,976.63t									
A2 Premises or plant to which this licence applies													
A2.1	The licence applies to the following premises: <table><tr><th>Premises Details</th></tr><tr><td>DIXON SAND PTY LTD</td></tr><tr><td>4610 OLD NORTHERN ROAD</td></tr><tr><td>MAROOKA</td></tr><tr><td>NSW 2756</td></tr><tr><td>LOT 1 DP 547255, LOT 2 DP 547255, LOT 29 DP 752025, LOT 196 DP 752025</td></tr></table> <i>Note: access to the premises is via the Crown Land access road connecting the Old Northern Road and the Quarry.</i>	Premises Details	DIXON SAND PTY LTD	4610 OLD NORTHERN ROAD	MAROOKA	NSW 2756	LOT 1 DP 547255, LOT 2 DP 547255, LOT 29 DP 752025, LOT 196 DP 752025	-	-	Noted.			
Premises Details													
DIXON SAND PTY LTD													
4610 OLD NORTHERN ROAD													
MAROOKA													
NSW 2756													
LOT 1 DP 547255, LOT 2 DP 547255, LOT 29 DP 752025, LOT 196 DP 752025													

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
1 ADMINISTRATIVE CONDITIONS (Cont'd)				
A2 Premises or plant to which this licence applies (Cont'd)				
A2.2	The premises location is shown on the map below. 	-	-	Noted.
A3 Information supplied to the EPA				
A3.1	Works and activities must be carried out in accordance with the proposal contained in the licence application, except as expressly provided by a condition of this licence. In this condition the reference to "the licence application" includes a reference to: a) the applications for any licences (including former pollution control approvals) which this licence replaces under the Protection of the Environment Operations (Savings and Transitional) Regulation 1998; and b) the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.	Compliant	-	EPL Application not available – originally issued in 2000. As the EPL should be generally consistent with DA 250-09-01, undertaking operations in accordance with the documentation supporting the DA is likely to result in compliance with this requirement. The Company has been assessed as being compliant with the relevant documentation supporting the DA – refer to commentary for DA 250-09-01 <i>Schedule 2 Condition 2</i> .

Table A4-2 (Cont'd)
Compliance Review – EPL 3916 (Version 1 March 2021)

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																
2 Discharges to Air and Water and Applications to Land																				
P1 Location of monitoring/discharge points and areas																				
P1.1	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. <table><tr><th colspan="4">Air</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><tr><td>2</td><td>Ambient air monitoring</td><td></td><td>Ambient air monitoring site located near the 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><tr><td>3</td><td>Meteorological station</td><td></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></table>	Air				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	2	Ambient air monitoring		Ambient air monitoring site located near the Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided to the DEC (by Fax) on 30 November 2004	3	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.
Air																				
EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																	
2	Ambient air monitoring		Ambient air monitoring site located near the Maroota Public School as marked in "Figure 1.3 - Existing and Proposed Development" provided to the DEC (by Fax) on 30 November 2004																	
3	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																	
P1.2	The following utilisation areas referred to in the table below are identified in this licence for the purposes of the monitoring and/or the setting of limits for any application of solids or liquids to the utilisation area.	-	-	Noted.																
P1.3	The following points referred to in the table are identified in this licence for the purposes of the monitoring and/or the setting of limits for discharges of pollutants to water from the point. <table><tr><th colspan="4">Water and land</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><tr><td>1</td><td>Discharge to waters. Effluent volume and quality monitoring.</td><td>Discharge to waters. Effluent volume and quality monitoring.</td><td>Main storage dam weir labelled as "2 Water" on map titled "Figure 1 Location & Discharge Points - Dixon Sand Maroota" received by the EPA on 9/1/01 with Licence Application Form.</td></tr></table>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Discharge to waters. Effluent volume and quality monitoring.	Discharge to waters. Effluent volume and quality monitoring.	Main storage dam weir labelled as "2 Water" on map titled "Figure 1 Location & Discharge Points - Dixon Sand Maroota" received by the EPA on 9/1/01 with Licence Application Form.	-	-	Noted.				
Water and land																				
EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description																	
1	Discharge to waters. Effluent volume and quality monitoring.	Discharge to waters. Effluent volume and quality monitoring.	Main storage dam weir labelled as "2 Water" on map titled "Figure 1 Location & Discharge Points - Dixon Sand Maroota" received by the EPA on 9/1/01 with Licence Application Form.																	
3 Limit Conditions																				
L1 Pollution of water																				
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	ONR01-2025 ONR02-2025 ONR03-2025 Observations	No controlled or uncontrolled discharges occurred during the audit period and no erosion or sedimentation was observed beyond the Quarry's water management system.																

Table A4-2 (Cont'd)
Compliance Review – EPL 3916 (Version 1 March 2021)

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																		
3 Limit Conditions (Cont'd)																						
L2 Concentration limits																						
L2.1	For each monitoring/discharge point or utilisation area specified in the table\s below (by a point number), the concentration of a pollutant discharged at that point, or applied to that area, must not exceed the concentration limits specified for that pollutant in the table.	Not Triggered	ONR01-2025 ONR02-2025 ONR03-2025	No water controlled or uncontrolled discharges were recorded during the audit period.																		
L2.2	Where a pH quality limit is specified in the table, the specified percentage of samples must be within the specified ranges.	Not Triggered																				
L2.3	To avoid any doubt, this condition does not authorise the pollution of waters by any pollutant other than those specified in the table\s.	-	-	Noted																		
L2.4	Water and/or Land Concentration Limits POINT 1 <table><tr><th>Pollutant</th><th>Units of Measure</th><th>50 percentile concentration limit</th><th>90 percentile concentration limit</th><th>3DGM concentration limit</th><th>100 percentile concentration limit</th></tr><tr><td>pH</td><td>pH</td><td></td><td></td><td></td><td>4.5-6.5</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td></td><td></td><td></td><td>50</td></tr></table>	Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit	pH	pH				4.5-6.5	Total suspended solids	milligrams per litre				50	-	-	Noted
Pollutant	Units of Measure	50 percentile concentration limit	90 percentile concentration limit	3DGM concentration limit	100 percentile concentration limit																	
pH	pH				4.5-6.5																	
Total suspended solids	milligrams per litre				50																	
L3 Waste																						
L3.1	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 or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by the licence.	Compliant	Advice from Environmental Officer. ONR01-2025 ONR02-2025 ONR03-2025	No waste was received at the Quarry site during the audit period.																		

Table A4-2 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
3 Limit Conditions (Cont'd)				
L4 Noise limits				
L4.1	Noise from the premises must not exceed: a) An LAeq(15 minute) noise emission criterion of 44dB(A) between 7.00am to 6.00pm Monday to Saturday; and, b) An LAeq(15 minute) noise emission criterion of 37dB(A) between 6am and 7am Monday to Saturday; at any nearby residence not owned by the licensee.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Attended noise monitoring undertaken during the audit period did not identify exceedances of the relevant noise criteria for the Quarry.
L4.2	Noise from the premises must not exceed an LAeq (1 hour) noise emission criterion of 45dB(A) at the most affected classroom of Maroota Public School.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Attended noise monitoring undertaken during the audit period did not identify exceedances of the relevant noise criteria for the Quarry.
L4.3	The noise limits identified in conditions L4.1 & L4.2 apply under meteorological conditions of: a) wind speeds up to 3 metres per second at 10 metres above ground level; and b) temperature inversion conditions up to 30C per 100 metres.	-	-	Noted.
L4.4	For the purpose of assessment of noise levels specified in this licence, noise from the premises shall be measured at: a) the most affected point on or within the receptor site boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary to determine compliance with LAeq(15 minute) noise limits in condition L4.1; and b) 1 metre from the dwelling façade of the most affected classroom to determine compliance with LAeq(1 hour) noise limit in condition L4.2; subject to the modification factors provided in Section 4 of the <i>NSW Industrial Noise Policy</i> (EPA, 2000).	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Noise compliance reports included as appendices to Annual Reviews during the audit period identify attended and at source noise monitoring locations, including attended monitoring at Maroota Public School.
L4.5	Notwithstanding condition L4.4, should direct noise measurement from the site be impractical, the licensee may employ alternative noise assessment method deemed acceptable by the EPA (refer to Section 11 of the <i>NSW Industrial Noise Policy</i> (EPA, 2000).	-	-	Noted.
L4.6	Noise limits identified in condition L4.1 do not apply for residential premises where there is a negotiated agreement between the licensee and the landowner of the premises.	Compliant	ONR23-2025	A noise agreement exists between Dixon Sand and residential receiver R2.

Table A4-2 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
3 Limit Conditions (Cont'd)				
L5 Hours of operation				
L5.1	Unless otherwise approved in writing by the EPA, construction of proposed earth bunds around the Maroota Public School setback perimeter, required for the mitigation of noise and dust, must only be carried out between 7am and 6pm Monday to Friday during school holiday periods.	Compliant	Advice from Operations Manager	Advised that construction of earth bunds around the Maroota Public School setback perimeter occurred during the July 2023 school holidays and within the specified hours. No complaints or issues raised by CCC.
L5.2	Loading of trucks and truck movements at the site must only be carried out between 6am and 6pm Monday to Saturday, and at no time on Sundays and Public Holidays. All other activities at the premises covered by this licence must only be carried out between the 7am and 6pm Monday to Saturday, and at no time on Sundays and Public Holidays.	Compliant	Spot check of records. ONR01-2025 ONR02-2025 ONR03-2025	A spot check of despatch records undertaken during the site inspection indicated that the Quarry was operating within approved hours.
4 Operating Conditions				
O1 Activities must be carried out in a competent manner				
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.	Storage was generally undertaken in a competent manner with designated storage areas. Minor staining was observed from stored equipment (Improvement ONR 114/25), however, no evidence of spillage. The processing, handling, movement and storage of substances including hydrocarbons observed during the site inspection was observed to be undertaken in a competent manner.
O2 Maintenance of plant and equipment				
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.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
4 Operating Conditions (Cont'd)				
O3 Dust				
O3.1	The premises must be maintained in a condition which minimises or prevents the emission of dust from the premises.	Compliant	Observations. ONR01-2025 ONR02-2025 ONR03-2025	It is considered that the site has generally been maintained in a condition which minimises the emission of dust.
O3.2	All dust deposition gauges installed at the site must be operated and maintained in accordance with Australian Standard 2724.1 (1984) for deposition gauges.	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	VGT Dust Deposition Reports, included as appendices to Annual Reviews, indicate sampling in accordance with AS3580.10.1 (supersedes AS 2724.1).
O3.3	The licensee must install and operate a continuous dust monitoring device, of the type mentioned in the letter of ERM Consultant sent to the EPA on 11 August 2004, at Point 2 identified in condition P1.1 of this licence, before commencing any activity permitted by this licence on Lot 1 & 2 of the premises. The continuous dust monitoring device must be fitted with an automatic alarm system alerting the quarry staff once the trigger value for PM ₁₀ (37 µg/m ³) is reached.	Compliant	Dixon Sand Website ONR01-2025 ONR02-2025 ONR03-2025 Advice from Environmental Officer.	Dust monitoring records present on Dixon Sand website. Dust monitoring results and calibration reported in Annual Reviews during the reporting period. The location of the monitoring station shown in the Environmental Monitoring Plan is consistent with Point 2 identified in condition P1.1. An automatic alarm system alerts Quarry personnel via text in the event of an exceedance of the relevant trigger value.
O3.4	The licensee must install and operate a continuous automatic meteorological station at monitoring Point 3, identified in condition P1.1 of this licence, as per requirements of AS 2923 - 1987. This wind monitoring components of the meteorological station must be interfaced with the continuous dust monitoring device, identified in the above condition O.3.3.	Compliant	ONR11-2025. ONR01-2025 ONR02-2025 ONR03-2025 Advice from Environmental Officer.	Meteorological data and calibration of the meteorological station reported in Annual Reviews during the reporting period. Location of monitoring station shown in Environmental Monitoring Plan is consistent with Point 3 identified in condition P1.1. The meteorological station interfaced with the continuous dust monitoring device.

Table A4-2 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
4 Operating Conditions (Cont'd)				
O4 Other operating conditions				
O4.1	The licensee must prevent any tracking of mud on to public roads by vehicles leaving the premises.	Compliant	ONR06-2022 Observation. Advice from Environmental Officer.	No significant tracking of material onto public roads was observed during the site inspection. Notwithstanding, opportunities for improvement were noted (see Improvement ONR I1/25). Checks of accumulated sediment are undertaken on a weekly basis. A sweeper attachment is utilised to remove accumulated sediment on sealed road surfaces following identification.
5 Monitoring and Recording Conditions				
M1 Monitoring Records				
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 ONR01-2025 ONR02-2025 ONR03-2025	Monitoring data during the audit period has been recorded as required.
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 ONR01-2025 ONR02-2025 ONR03-2025	All monitoring records are available in a legible form for a period of >4years.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions								
5 Monitoring and Recording Conditions (Cont'd)												
M1 Monitoring Records (Cont'd)												
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	ONR01-2025 ONR02-2025 ONR03-2025	Water sampling is undertaken in accordance with the Water Discharge Permit protocol which outlines the appropriate information to be recorded. No controlled or uncontrolled discharges occurred during the audit period. 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.								
M1.4	The following records for monitoring Point 2 identified in licence condition P1.1, must be kept electronically: a) each 15 minute PM10 result; b) each rolling 24-hour average PM10 results (each 15 minutes); and c) each daily 24-hour average PM10 result (midnight to midnight).	Compliant	Observation Advice from Environmental Officer.	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 Improvement ONR I16/25 .								
M1.5	The following records for Point 3 identified in licence condition P1.1, must be kept electronically: 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.								
M2 Requirement to monitor concentration of pollutants discharged												
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:	-	-	-								
M2.2	Air Monitoring Requirements POINT 2 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>PM10</td><td>micrograms per cubic metre</td><td>Continuous</td><td>Australian Standard 3580.9.8 - 2001</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	PM10	micrograms per cubic metre	Continuous	Australian Standard 3580.9.8 - 2001	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	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									

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																
5 Monitoring and Recording Conditions (Cont'd)																				
M2 Requirement to monitor concentration of pollutants discharged (Cont'd)																				
M2.3	Water and/ or Land Monitoring Requirements POINT 1 <table><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr><tr><td>pH</td><td>pH</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>Total suspended solids</td><td>milligrams per litre</td><td>Daily during any discharge</td><td>Grab sample</td></tr><tr><td>Turbidity</td><td>nephelometric turbidity units</td><td>Daily during any discharge</td><td>Grab sample</td></tr></table>	Pollutant	Units of measure	Frequency	Sampling Method	pH	pH	Daily during any discharge	Grab sample	Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample	Turbidity	nephelometric turbidity units	Daily during any discharge	Grab sample	Not Triggered	ONR01-2025 ONR02-2025 ONR03-2025	No controlled or uncontrolled discharge occurred during the audit period.
Pollutant	Units of measure	Frequency	Sampling Method																	
pH	pH	Daily during any discharge	Grab sample																	
Total suspended solids	milligrams per litre	Daily during any discharge	Grab sample																	
Turbidity	nephelometric turbidity units	Daily during any discharge	Grab sample																	
M2.4	"If any rolling 24-hour average PM ₁₀ result measured at Point 2 in licence condition M2.2 is found to be greater than 42µg/m ³ and the prevailing wind at the site is north-westerly, i.e. between 2700 and 3150 as measured at Point 3: a) the licensee must take immediate action to reduce its PM ₁₀ emissions; b) the licensee must immediately notify the EPA Manager Sydney Industry; c) all dust generating activity on lot 1 and 2 must cease immediately, except for activity solely for the purpose of reducing dust impact, such as watering roads, exposed areas and stockpiles or dust monitoring; d) if the dust level does not return to below 42µg/m ³ within 1 hour of ceasing all operations at Lot 1 & 2, then: all dust generating activity on Lot 29 must also stop; and operations must stay restricted to precincts 1, 2, 3, 4, 5, 6, 8 and 9 of Lot 196 (shown in the map faxed to DEC on 25/11/04) only; and e) dust generating activity may only recommence when the rolling 24-hour average PM ₁₀ result measured at Point 2 is less than 42µg/m ³ for 4 consecutive 15 minute periods."	Compliant	ONR01-2025 ONR02-2025 ONR03-2025 ONR43-2025 ONR44-2025	Details of exceedances of the 42µg/m ³ level is reported in Annual Reviews and the TEOM alarm register. During the audit period four exceedances of the 42µg/m ³ level occurred on: - 7 March 2023; - 2 September 2024; and - 27 May 2025. All exceedances were reported to EPA, appropriate measures undertaken and investigations concluded that exceedances were not Quarry-related. It is noted that the CBased reports appended to the Annual Reviews appear to report against daily PM ₁₀ results rather than rolling 24-hour average PM ₁₀ results for this EPA criteria (see Improvement ONR I15/25).																

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions																														
5 Monitoring and Recording Conditions (Cont'd)																																		
M3 Testing methods - concentration limits																																		
M3.1	Subject to any express provision to the contrary in this licence, monitoring for the concentration of a pollutant discharged to waters or applied to a utilisation area must be done in accordance with the Approved Methods Publication unless another method has been approved by the EPA in writing before any tests are conducted.	Not Triggered	ONR01-2025 ONR02-2025 ONR03-2025 Advice from Environmental Officer.	No controlled or uncontrolled discharge occurred during the audit period. No pollutants are applied to a utilisation area.																														
M3.2	Monitoring for the concentration of a pollutant emitted to the air required to be conducted by this licence must be done in accordance with: a) any methodology which is required by or under the Act to be used for the testing of the concentration of the pollutant; or 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 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. <i>Note: The Protection of the Environment Operations (Clean Air) Regulation 2010 requires testing for certain purposes to be conducted in accordance with test methods contained in the publication "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW".</i>	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	Environmental Monitoring Air Quality reports included within the Annual reviews during the audit period indicate that air quality monitoring and sample analysis has been undertaken in accordance with the relevant approved method and applicable standards.																														
M4 Weather monitoring																																		
M4.1	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. POINT 3	Compliant	ONR01-2025 ONR02-2025 ONR03-2025	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 Improvement ONR I16/25 .																														
<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</td><td>1 hour</td><td>Continuous</td></tr> <tr> <td>Wind Direction at 10 metres</td><td>AM-2 & AM-4</td><td>-</td><td>15 minutes</td><td>Continuous</td></tr> <tr> <td>Wind Speed at 10 metres</td><td>AM-2 & AM-4</td><td>metres per second</td><td>15 minutes</td><td>Continuous</td></tr> <tr> <td>Sigma theta</td><td>AM-2 & 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	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
Parameter	Sampling method	Units of measure	Averaging period	Frequency																														
Temperature at 10 metres	AM-4	Degrees	1 hour	Continuous																														
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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																														

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
5 Monitoring and Recording Conditions (Cont'd)				
M5 Recording of pollution complaints				
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	Observation. Dixon Quarry Group Website.	Complaints register sighted during site inspection. A summary of the complaints register is provided on the Dixon Quarry Group website.
M5.2	The record must include details of the following: a) the date and time of the complaint; b) the method by which the complaint was made; c) any personal details of the complainant which were provided by the complainant or, if no such details were provided, a note to that effect; d) the nature of the complaint; e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and f) if no action was taken by the licensee, the reasons why no action was taken.	Compliant	Observation. Dixon Quarry Group Website. ONR01-2025 ONR02-2025 ONR03-2025	Complaints are adequately documented and all required details are recorded.
M5.3	The record of a complaint must be kept for at least 4 years after the complaint was made.	Compliant	Observation ONR01-2025 ONR02-2025 ONR03-2025	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.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions						
5 Monitoring and Recording Conditions (Cont'd)										
M6 Telephone complaints line										
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 Observation.	Telephone complaints line: (02) 4566 8348 The telephone complaints line is advertised on a sign at the front gate of the Quarry (<i>Photo E1021C_099</i>). 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	Complaints Line published on the website and on the front gate sign	Telephone complaints line advertised on the Dixon Quarry Group website.						
M6.3	The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.	-	-	The EPL was in force prior to the audit period.						
M7 Requirement to monitor volume or mass										
M7.1	For each discharge point or utilisation area specified below, the licensee must monitor: a) the volume of liquids discharged to water or applied to the area; b) the mass of solids applied to the area; c) the mass of pollutants emitted to the air; at the frequency and using the method and units of measure, specified below. POINT 1 <table><thead><tr><th>Frequency</th><th>Unit of Measure</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Daily</td><td>litres</td><td>Flow meter and continuous logger</td></tr></tbody></table>	Frequency	Unit of Measure	Sampling Method	Daily	litres	Flow meter and continuous logger	Not Triggered	ONR01-2025 ONR02-2025 ONR03-2025 Observation.	A flow meter is fitted to discharge point LDP01 if discharges are required. No discharges occurred during the audit period.
Frequency	Unit of Measure	Sampling Method								
Daily	litres	Flow meter and continuous logger								

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
6 Reporting Conditions				
R1 Annual return documents				
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	ONR46-2025 ONR47-2025 ONR48-2025 ONR49-2025	Annual Returns and submission records provided for 2021/2022, 2022/2023, 2023/2024 and 2024/2025.
R1.2	An Annual Return must be prepared in respect of each reporting period, except as provided below.	Compliant	ONR46-2025 ONR47-2025 ONR48-2025 ONR49-2025	Annual Returns and submission records provided for 2021/2022, 2022/2023, 2023/2024 and 2024/2025.
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.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
6 Reporting Conditions (Cont'd)				
R1 Annual return documents (Cont'd)				
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	POEO Public Register	Each Annual Return was submitted within the relevant time periods during the audit period.
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	ONR46-2025 ONR47-2025 ONR48-2025 ONR49-2025	Copies of Annual Returns retained at the Quarry were provided upon request and remain available through eConnect.
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	ONR46-2025 ONR47-2025 ONR48-2025 ONR49-2025	Annual Returns were submitted via eConnect, with the submission record and notification sighted.
	<i>"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.</i> <i>Note: An application to transfer a licence must be made in the approved form for this purpose."</i>	-	-	Noted.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
6 Reporting Conditions (Cont'd)				
R2 Notification of environmental harm				
R2.1	Notifications must be made by telephoning the Environment Line service on 131 555.	Not Triggered	ONR01-2025 ONR02-2025 ONR03-2025 ONR45-2025	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 L4.1 and 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	ONR01-2025 ONR02-2025 ONR03-2025 ONR45-2025	No incidents causing or threatening material harm to the environment were recorded during the reporting period.
	<i>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.</i>	Not Triggered	ONR01-2025 ONR02-2025 ONR03-2025 ONR45-2025	No incidents causing or threatening material harm to the environment were recorded during the reporting period.
R3 Written report				
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	ONR01-2025 ONR02-2025 ONR03-2025 ONR45-2025 Advice from Environmental Officer	No requests received.
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.

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
6 Reporting Conditions (Cont'd)				
R3 Written report (Cont'd)				
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.
R3.5	The licensee must submit an air and dust monitoring report to the EPA annually for all dust monitoring gauges installed at the site (identified as D1–Front gate, D4–Western boundary Lot 196, D5–Northern boundary Lot 1, D6–Adjacent Maroota Public School and D7–Adjacent Kunzea conservation area Lot 29), other than the continuous dust gauge installed at Point 2 for activity related to DA 250-09-01 and monitored as per requirements of condition M2.2, containing the air quality monitoring results in the reporting period together with an evaluation of the results, including a comparison with the following ambient dust goal: a) the total dust deposition in the nearest residential area of 4g per square metre per month expressed as an annual monthly average.	Compliant	ONR46-2025 ONR47-2025 ONR48-2025 ONR49-2025	Annual Returns containing air quality monitoring reports, results and an evaluation of results against relevant criteria were submitted to the EPA for the audit period.

Table A4-2 (Cont'd)
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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
7 General Conditions				
G1 Copy of licence kept at the premises or plant				
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 available on site during the site inspection.
G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Compliant		
G1.3	The licence must be available for inspection by any employee or agent of the licensee working at the premises.	Compliant		
8 Pollution Studies and Reduction Programs				
U1 Air Quality Monitoring				
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	ONR34 to 36-2025	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 _{2.5} 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	ONR54-2025	Umwelt Australia was engaged on 10 October 2024 to complete the assessment.

Table A4-2 (Cont'd)
Compliance Review – EPL 3916 (Version 1 March 2021)

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Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
8 Pollution Studies and Reduction Programs (Cont'd)				
U1 Air Quality Monitoring (Cont'd)				
U1.3	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: a. Identify appropriate ambient air quality monitoring for PM10, PM2.5 and TSP (Air Monitoring) at locations within the Premises in accordance with the EPA Ambient Air Monitoring Guidance (January 2022). b. 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). c. Continuous meteorological monitoring, including wind data. d. 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 recommendations on the continuation or changes to the current dust monitoring at the Premises and supported by valid data.	Compliant	ONR34 to 36-2025	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	Air Quality Monitoring Report: By (fourteen months of issuing the Variation Notice), the Licensee must provide the EPA, via email at info@epa.nsw.gov.au, 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: a. analyse and summarise the data including a comprehensive summary of the monitoring undertaken as required outlined in condition U1.3, and b. adequately addresses and justify any recommendations on the continuation or changes to the dust monitoring at the Premises and supported by valid data	Non-Compliant	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 (Recommendation ONR R1/25).

Table A4-3
Compliance Review – WAL 24341

Page 1 of 2

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
Take of water				
MW0605-00001	Water must be taken in compliance with the conditions of the approval for the nominated work on this access licence through which water is to be taken.	Not Triggered	ONR50 to 52-2025 Advice from Environmental Officer.	No water was extracted during the audit period.
MW0547-00001	The total volume of water taken under this licence in any water year must not exceed a volume equal to: A. the sum of water in the account from the available water determination for the current year, plus B. the water carried over in the account from the previous water year, plus C. the net amount of water assigned to or from the account under a water allocation assignment, plus D. any water re-credited by the Minister to the account.	Compliant	ONR50 to 52-2025 Advice from Environmental Officer.	No water was extracted during the audit period. Therefore, compliance will have been maintained.
MW0919-00001	A maximum water allocation of 0.1 ML/unit share may be carried over in the account for this access licence from one water year to the next water year if a water meter is installed on each water supply work nominated on this licence and each meter is maintained in working order.	Not Triggered	-	Noted. As no water extraction has occurred no water has been required to carry over.
MW0929-00001	From 1 July 2018, if the water supply work nominated on this access licence is located at or less than 40m from the top of the high bank of a river then:			
	A. water must not be taken in this groundwater source when flows are in the Very Low Flow Class for an unregulated river access licence in that river.	Compliant	ONR50 to 52-2025 Advice from Environmental Officer.	It is advised that no water was extracted during the audit period. Therefore, compliance will have been maintained.
	B. This restriction will only apply when the system that confirms when water can be taken is available on the relevant licensor website.	-	-	Noted
	C. the relevant licensor will inform the licence holder in writing of the applicable restrictions and how to access the information on its website when this system becomes operative.	-	-	Noted

Table A4-3
Compliance Review – WAL 24341

Page 2 of 2

Cond. No.	Conditional Requirement	Compliance Status	Basis for Compliance	Comments and Recommended Actions
Monitoring and recording				
MW0606-00001	The volume of water taken in the water year must be recorded in the logbook at the end of each water year. The maximum volume of water permitted to be taken in that water year must also be recorded in the logbook.	Not Triggered	ONR50 to 52-2025 Advice from Environmental Officer.	No water was extracted during this period. A logbook was maintained recording nil take.
MW2336-00001	The purpose or purposes for which water is taken, as well as details of the type of crop, area cropped, and dates of planting and harvesting, must be recorded in the logbook each time water is taken.	Not Triggered	ONR50 to 52-2025 Advice from Environmental Officer.	No water was extracted during this period.
MW2339-00001	A logbook must be kept, unless the work is metered and fitted with a data logger. The logbook must be produced for inspection when requested by the relevant licensor.	Not Triggered	ONR50 to 52-2025 Advice from Environmental Officer.	A logbook was maintained recording nil take. No requests to inspect the logbook have been received.
MW2338-00001	The completed logbook must be retained for five (5) years from the last date recorded in the logbook.	Not Triggered	ONR50 to 52-2025 Advice from Environmental Officer.	No water was extracted during this period. A logbook was maintained recording nil take.
MW2337-00001	The following information must be recorded in the logbook for each period of time that water is taken: A. date, volume of water, start and end time when water was taken as well as the pump capacity per unit of time, and B. the access licence number under which the water is taken, and C. the approval number under which the water is taken, and D. the volume of water taken for domestic consumption and/or stock watering.	Not Triggered	ONR50 to 52-2025 Advice from Environmental Officer.	No water was extracted during this period. A logbook was maintained recording nil take.
Reporting				
MW0051-00002	Once the licence holder becomes aware of a breach of any condition of this access licence, the licence holder must notify the Minister as soon as practicable. The Minister must be notified by: A. email: water.enquiries@dpi.nsw.gov.au B. telephone: 1800 353 104. Any notification by telephone must also be confirmed in writing within seven (7) business days of the telephone call.	Not Triggered	Advice from Environmental Officer.	No breaches occurred during the audit period.

Appendix 5

Site Inspection Photographs

(Total No. of pages including blank pages = 9)



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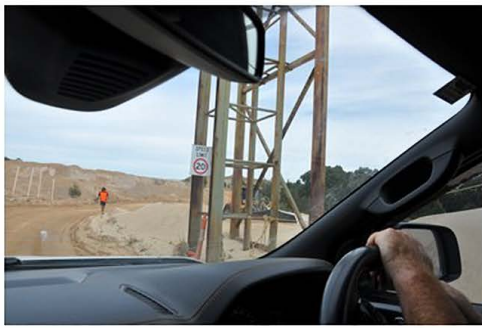
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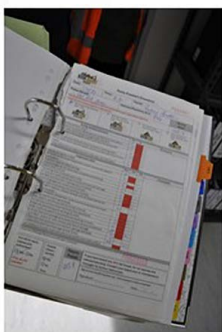
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Appendix 6

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

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR R1/22	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. <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>	Non-compliance	Proposed Action: 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. Implementation Timeframe: Training will be conducted by 31 January 2023.	The Company advises that retraining was completed. Toolbox records and signature records for new pre-start books (April 2025) sighted. 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)
ONR R2/22	The current Site Traffic Management Plan should be updated to reflect all requirements of truck drivers when within the Quarry Site and on the public road network travelling to and from the Quarry. <i>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).</i>	Non-compliance	Proposed Action: The Site Traffic Management Plan will be reviewed to bring the requirements up-to-date. Cross references to other documents such as the Driver's Code of Conduct will be reviewed and revised accordingly. Implementation Timeframe: The review of the Site 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.	The current Traffic Management Plan (TMP) remains the November 2020 version. No issues considered to be likely to result in non-compliance were identified during the review of the TMP during the 2025 IEA. The review of the TMP is therefore repeated as suggested Improvement ONR I11/25.

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

Page 2 of 15

ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR R3/22	The new Clearway software program to be installed at the Old Northern Road Quarry in November/December 2022 should ensure that the vehicles entering the Quarry between 5:45am and 7:00am are accounted for in the total traffic counts for that period. <i>The current practice to control the total number of trucks entering and leaving the Quarry between 5:45am and 7:00am is reliant upon preventing no more than 20 laden trucks to leave the weighbridge before 7am. This approach assumes only 20 trucks enter during this period. At present, uncertainty exists about the number of unladen trucks that enter the Quarry during this period. Hence, it is important that the new software system accounts for both unladen vehicles entering and laden trucks leaving the Quarry during this period. The new program would also record the number of laden trucks entering and leaving the Quarry at other times of day, i.e. in accordance with Condition 3(21).</i>	Non-compliance	Proposed Action: The Clearway software program is to provide tracking of vehicles entering the quarry between 5:45 am and 7:00 am which will be included in the total traffic counts for the morning truck period. Implementation Timeframe: 31 January 2023 Note that the pilot Clearway software program was launched on 14 December 2022 and Dixon Sand is currently undergoing software testing and fine tuning prior to full implementation.	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 21 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. See Recommendation ONR R4/25.
ONR R4/22	The upper surface of the entire western wall of the Twin Ponds and the adjoining current overburden stockpile area roadway should be reshaped to prevent runoff flowing over the western slope into areas without any sediment control. All areas where erosion has occurred should be repaired. <i>Areas were observed where runoff from the upper surface of the western wall of the Twin Dams had flowed to the west and over the steep slopes on the western side of the Twin Dams and adjoining current overburden stockpile area. In one area, considerable erosion had occurred with runoff potentially being able to flow beyond the western boundary of the Quarry (Photo 13).</i>	Non-compliance	Proposed Action: The upper surface western wall of the Twin Ponds area and the adjoining current overburden stockpile area roadway on Lot 29 will be reshaped to manage any runoff water and sediments are contained within the quarry area. All areas where erosion has occurred will be repaired as soon as it is safe to do so and weather permitting. Implementation Timeframe: 31 January 2023. Note that remediation work has commenced mid January 2023.	The upper area of erosion has been filled/shaped and the roadside bunding increased to prevent further overflows (<i>Photo E1021C_037</i>). No active erosion was observed. This area should continue to be inspected as part of the monthly inspections.

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

Page 3 of 15

ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR R5/22	All star posts installed around the perimeter of the approved extraction area should be painted in a bright colour to alert all Quarry personnel of their location on the boundary. <i>The surveyed star posts observed on the eastern boundary of Stage 5 within Lot 1 DP 547255 are steel grey in colour and not readily detected, particularly by operators of earthmoving equipment (Photo 28).</i>	Non-compliance	Proposed Action: Star posts installed around the perimeter of the approved extraction area will be painted in a bright colour to improve visibility. This will be communicated to the teams at a toolbox talk and prior to clearing activities. Implementation Timeframe: 28 February 2023	During the audit site inspection key star posts were observed to have been painted either blue or white. Signage was also present in key areas for the 250m and 50m buffer areas (stating "Rehabilitation Area Keep Out" and "Environment Protection Zone"). The construction of the 5m bunding along the 250m buffer limit will provide a clear limit of extraction. It is also advised that a pre-clearance protocol is in place as per the approved Biodiversity and Rehabilitation Management Plan with no clearing undertaken without documented internal approval.
ONR R6/22	All monuments above the groundwater piezometers on site and deposited dust gauges within the Quarry should be better identified with a painted / engraved / panel displaying the monitoring site reference number. <i>The monument on Monitoring Well MW2 on the eastern side of Lot 1 DP 547255 was observed to be without any external identification.</i>	Non-compliance	Proposed Action: The groundwater piezometer monuments on site and deposited dust gauges within the Quarry will be installed with permanent identification tags to display the monitoring site reference number. Implementation Timeframe: 31 March 2023.	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 Improvement ONR I7/25).
ONR R7/22	The SDS register should be structured to record alphabetically the product type <u>and</u> manufacturer. <i>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 SDS sheet, particularly in the event of an emergency.</i>	Non-compliance	Proposed Action: 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. Implementation Timeframe: 31 March 2023.	The SDS register now includes alphabetically sorted product and supplier lists.

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

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR R8/22	The introduction of new and potentially noisy items of equipment, or undertaking new tasks where operating circumstances are different to those previously encountered, should be planned to occur in an isolated area of the Quarry or at a time when all other equipment is not operating. <i>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 adjusted.</i>	Non-compliance	Proposed Action: Undertake noise monitoring on newly introduced equipment which has the potential to generate excessive noise to determine the overall implications of the quarry operation. Implementation Timeframe: Immediate – undertake an isolated noise monitoring on any future introduced noisy equipment prior to its introduction to the whole quarry operation.	This recommendation was not triggered during the audit period. Whilst no noise exceedances occurred during the audit period, this Recommendation has been retained as an improvement to update the Noise Management Plan to include measurement of new potentially noise equipment as a formal management measure. Improvement ONR I4/25.
ONR R9/22	Continue to follow up with the DPE to ensure that the Positive Public Covenant to provide long-term security of the Haerses Road Biodiversity Offset Area is fully processed to enable it to be implemented. <i>Dixon Sand has submitted all required information regarding the Positive Public Covenant to DPE and awaits the Department's response in order for this matter to be finalised.</i>	Non-compliance	Proposed Action: Dixon Sand will contact DPE to continue with the review of the proposed draft conditions in order to finalise the Positive Public Covenant registration. Implementation Timeframe: Dixon Sand to contact DPE by 31 January 2023.	Dixon Sand contacted DPE on 21 January 2023 with no response. Dixon Sand subsequently submitted the draft terms of the Public Positive Covenant instrument via the Major Project Portal 17 July 2024 (<i>Document ONR25-2025</i>). This remains subject to considerations / assessment by DPHI. Recommendation ONR R5/25.

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

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR R10/22	A general <i>Incident Response Checklist</i> should be prepared for the 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. <i>No record of strategies, plans and programs having been reviewed within three months following the submission of incident reports were maintained during the audit period. Additionally, DPE was not notified in writing that a review of strategies, plans and programs had been undertaken within 3 months following the submission of an incident report. The period between the identification of an uncontrolled discharge event and notification of the incident to DPE and the EPA exceeded the specified 7-day notification period and 14-day reporting period.</i>	Non-compliance	Proposed Action: 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. Implementation Timeframe: 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.	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 Improvement ONR I13/25 and Recommendation ONR R6/25.
ONR R11/22	The quality of any water discharging off site at the licenced discharge monitoring Point 1 should be established through the collection of a representative sample daily during the period of discharge (including uncontrolled discharge) and analysis at an accredited laboratory. Where access to Monitoring Point 1 (i.e. Main Dam weir, LDP01) is not possible during discharge due to safety concerns, a representative sample should be taken from the Main Dam daily during discharge. <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 and EPL 3916.</i>	Non-compliance	Proposed Action: Dixon Sand will obtain a daily water sample for water quality analysis by an accredited laboratory during the period of discharge for future planned and uncontrolled discharge events. Where access to LDP01 for sampling is restricted due to extreme weather or safety concerns, a representative sample will be obtained from the Main Dam for analysis. Implementation Timeframe: Immediate – triggered in both instance during planned and uncontrolled discharge events	No discharges, either controlled or uncontrolled, occurred during the audit period (<i>Documents ONR01 to 03-2025</i>).

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

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR R12/22	All landowners affected by noise exceedances should be notified in the manner consistent with Condition 4(1)(a). <i>Not all affected landowners were notified regarding the results of noise monitoring undertaken on 3 December 2019.</i>	Non-compliance	Proposed Action: Dixon Sand will notify affected landowners of the result of any future noise exceedances in accordance with Condition 4(1)(a) of Schedule 4. Implementation Timeframe: Immediate – triggered when the noise criteria is exceeded at the receiver.	Not triggered during the audit period (<i>Documents ONR1 to 3-2025</i>).
ONR I1/22	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. <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>	Suggested Improvement	Proposed Action: 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. Implementation Timeframe: 30 June 2023	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.

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

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR I2/22	All documentation referred to in the Driver's Code of Conduct should be reviewed and updated, where appropriate. These include: - the Maroota Local Traffic Management Policy; - the Site Induction for Drivers; and - the Site Traffic Control Plan. 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. <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>	Suggested Improvement	Proposed Action: 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. Implementation Timeframe: 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.	The TMP was last updated in 2020, i.e. has not been updated since the 2022 IEA. See Improvement ONR I11/25. 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.

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

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR I3/22	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. <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>	Suggested Improvement	Proposed Action: 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. Implementation Timeframe: Immediate and ongoing – commence review and revision of the document control system. Timeline may take several years however, Dixon Sand is committed to demonstrate improvement of the system in the next IEA 2025.	Many documents sighted still did not contain this information (for example the updated SDS register, the 2024/2025 WAL logbook). Repeated as Improvement ONR I17/25 .
ONR I4/22	The basis for indicating compliance with individual requirements on the Monthly Site Condition Check List should be clarified and/or the requirements adjusted to match the information relied upon. <i>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.</i> <i>The current Monthly Site Condition Check List appears comprehensive – notwithstanding 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.</i>	Suggested Improvement	Proposed Action: The Monthly Site Condition Checklist will be reviewed and revised to include the key operational management commitments as outlined in the Development Consent, EPL and Management Plans. Implementation Timeframe: The review and revision of the Monthly Site Condition 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.	The Site Condition Checklist included within the EMS is dated 10/03/2020 and is presented on the Dixon Sand Website. However, the Site Condition Checklist was updated 22 June 2023 (V3.0). The items and wording in the checklist remain per the 2020 V2.0. Whilst the checklist 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. See suggested Improvement ONR I10/25.

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Status of Implementation of 2022 Audit Response Actions

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR I5/22	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. <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>	Suggested Improvement	Proposed Action: 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. Toolbox talks will continue to provide engaging group discussions around environmental news, incidents and awareness. Implementation Timeframe: Immediate – reinduction program will be carried out annually, commencing in 2023.	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.
ONR I6/22	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 Environmental Analysis (JSEA). This practice would ensure that for each new task/project undertaken on site that environmental issues are appropriately managed. <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 or notifications to adjoining landowners?</i>	Suggested Improvement	Proposed Action: 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. Implementation Timeframe: 30 June 2023.	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.

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ID	2022 IEA Comments and Recommendation / Suggested Improvement	Compliance Classification	Proposed Action(s) and Timeframe	2025 IEA Status Review
ONR I7/22	All publicly available documents placed on the Company's website should provide direct links from the Table of Contents or other references in the reports to the relevant Figure, table, photos or appendices. <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>	Suggested Improvement	Proposed Action: Future new documents on the website will be compiled to enable direct links from the Table of Contents or other references in the reports to the relevant figure, table, photos or appendices. The existing documents on the website will not be edited for the above. Implementation Timeframe: Immediate – future documents.	The EMS is the key document updated since the previous audit. This updated document includes hyperlinks within the Table of Contents to sections, tables, figures etc.

Appendix 7

Document Reference Table

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

Table A7-1
Principal Audit Documentation Reviewed

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Ref No.	Document Name
ONR06-2022	Traffic Management Plan
ONR15-2019	2001 EIS Lots 1 & 2
ONR16-2019	Modification 1
ONR17-2019	Modification 2
ONR18-2019	Modification 3
ONR19-2019	Modification 4
ONR20-2019	Modification 5
ONR21-2019	EIS 1999
ONR25-2019	Buffer zone survey submission
ONR27-2019	Bore hole drill records
ONR37-2019	DPE Response – Extension of EMS Review Until March 2018 – 10 January 2018
ONR38-2019	Maximum Extraction Depth Map Approval from DPE – 3 July 2018
ONR41-2019	Re-appointment of CCC by DPE
ONR48-2019	Fencing contractor payment record
ONR49-2019	Biodiversity and Rehabilitation Bond calculation – September 2018
ONR50-2019	DPE Approval of Biodiversity and Rehabilitation Bond calculation
ONR51-2019	Banker's Undertaking – Biodiversity and Rehabilitation Bond
ONR52-2019	Confirmation of Biodiversity and Rehabilitation Bond exchange with DPE.
ONR53-2019	Approval of Environmental Management Strategy and components.
ONR56-2022	Letter to DIE - Confirmation of Rehabilitation Bond Review (3 August 2020)
ONR76-2022	DPIE Approval of Noise Management Plan (22 October 2020)
ONR77-2022	DPIE Approval of Air Quality Management Plan (16 November 2020)
ONR78-2022	DPIE SWMP Approval
ONR79-2022	DPIE TMP Approval
ONR80-2022	DPIE BRMP Approval
ONR81-2022	DPIE EMS Approval
ONR01-2025	2022/2023 Annual Review
ONR02-2025	2023/2024 Annual Review
ONR03-2025	2024/2025 Annual Review
ONR04-2025	DRG Annual Return 2022-2023
ONR05-2025	DRG Annual Return 2023-2024
ONR06-2025	DRG Annual Return 2024-2025
ONR07-2025	Environmental Management Strategy
ONR08-2025	Plan Preparation Checklist
ONR09-2025	DA 250-09-01 Consent Conditions
ONR10-2025	EPL 3916 Conditions
ONR11-2025	Environmental Monitoring Plan
ONR12-2025	PIRMP
ONR13-2025	Noise Management Plan
ONR14-2025	Air Quality Management Plan

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Principal Audit Documentation Reviewed

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Ref No.	Document Name
ONR15-2025	Soil and Water Management Plan
ONR16-2025	Biodiversity and Rehabilitation Management Plan
ONR17-2025	Community Relations Plan
ONR18-2025	Site Condition Checklist
ONR19-2025	Complaints Register Form
ONR20-2025	Bushfire Management Plan Part 1
ONR21-2025	Bushfire Management Plan Part 2
ONR22-2025	Maximum Extraction Depth Map
ONR23-2025	Dixon Sand Noise Agreement
ONR24-2025	DPI Fisheries advice regarding Strip 4 Permit
ONR25-2025	Positive Public Covenant resubmission
ONR26-2025	DPE commenced assessment of Positive Public Covenant
ONR27-2025	Letter to DPIE - Confirmation of Rehabilitation Bond Review (10 February 2021)
ONR28-2025	DPE approval of AR calendar year submission
ONR29-2025	DPHI approval of 2024 EMS
ONR30-2025	Extraction Depth Survey – Lot 2 2023
ONR31-2025	Extraction Depth Survey – Lot 2 2025
ONR32-2025	Extraction Depth Survey – Lot 196 2022
ONR33-2025	EPL3916 Version Date 12 September 2024
ONR34-2025	EPL3916 Condition U1 Submission Letter 12 November 2024
ONR35-2025	EPL3916 Condition U1 Submission Email 12 November 2024
ONR36-2025	EPL3916 Condition U1 Air Monitoring Review and Plan 12 November 2024
ONR37-2025	Letter to DPI Fisheries dated 30 May 2023 to consult regarding permit requirements.
ONR38-2025	DPI Fisheries email response dated 2 June 2023 confirming no permits required.
ONR39-2025	EMS and plan review letter to DPE dated 27 December 2022
ONR40-2025	EMS and plan review letter to DPE dated 29 December 2023
ONR41-2025	EMS and plan review letter to DPE dated 30 December 2024
ONR42-2025	EMS and plan review letter to DPE dated 14 April 2023
ONR43-2025	Incident Reports
ONR44-2025	TEOM Alarm Register
ONR45-2025	Incident Register
ONR46-2025	EPL Annual Return Documents 2021/2022 Period
ONR47-2025	EPL Annual Return Documents 2022/2023 Period
ONR48-2025	EPL Annual Return Documents 2023/2024 Period
ONR49-2025	EPL Annual Return receipt for 2024/2025 Period
ONR50-2025	WAL 24341 2022/2023 Water Usage Return
ONR51-2025	WAL 24341 2023/2024 Water Usage Return
ONR52-2025	WAL 24341 2024/2025 Water Usage Return
ONR53-2025	Morning Truck Example Records
ONR54-2025	Umwelt Engagement Evidence for EPL Condition U1.1
ONR55-2025	Incident Register Form

End of Document