



Independent Environmental Audit - Salt Ash Quarry

Assessment of compliance in accordance with PA-07_0094 MOD 5
Development Consent and EPL 13406

Audit Reference:	14159-01
Audit Organisation:	Redisand (Operator) IEMA (Environmental Consultant) WPP (Planner)
Auditors:	Grant Brown, APP (Lead Auditor) Anita Rylah, APP (Peer Reviewer) Sanan Qasim, APP (Auditing Support)
Date of Audit:	22 & 23 April 2024
Draft Report Submitted:	31 May 2024
Final Report V0 Submitted:	25 June 2024
Final Report V1 Submitted:	04 December 2024
Final Report V2 Submitted:	10 January 2025

Distribution and Authorisation Record

Revision No.	Date	Issued to	Comments
Draft 1	31 May 2024	Grant Stevenson, Redisand	Initial draft for review
Final V0	25 June 2024	Grant Stevenson, Redisand	Final report
Final V1	04 December 2024	Grant Stevenson, Redisand	Including DPHI RFI response and SME comments
Final V2	10 January 2025	Grant Stevenson, Redisand	Includes Ecosure Report

This report has been prepared and reviewed in accordance with our quality control system.

This report has been prepared by:

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Lead Environmental Auditor

Date: 10 January 2025

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1. Executive Summary

The APP Group (APP) were engaged by ATB Morton Pty Ltd (ATB Morton) to complete the Independent Environmental Audit (IEA) for 2024. ATB Morton is required to undertake an IEA of the Redisand Salt Ash Sand Mine Quarry (Redisand) every three years (commencing in December 2013) of compliance with the consent conditions. The requirement for the IEA is detailed in Schedule 5 Condition 9 of Project Approval (PA) 07_0094. The IEA assessed compliance against Project Approval (PA07_0094), the Environment Protection Licence and the Statement of Commitments.

This IEA covers the period from 14 October 2020 to 23 April 2024.

The IEA identified a number of non – compliances which are mainly with regards to the detail, revision, and submission of documentation; and to a lesser extent, some missed monitoring events and/or result exceedances resulting in non – compliances within the Project Approval, the Statement of Commitments, and the Environment Protection Licence.

Version 1 of this audit report has been prepared in response to a Request for Information (RFI) from DPHI on 14/10/24. The report has been updated to include specialist input on conditions relating to ecology, rehabilitation and groundwater management. A table addressing the DPHI queries in the RFI has been included in Section 5.7 and a copy of the correspondence is included in Appendix E.

The site location and approved quarry boundary is shown in **Figure 1** and **Figure 2** below.



Figure 1. Site location



Figure 2. Approved Quarry Boundary

This Audit Report presents the outcomes of the independent environmental audit of the Salt Ash Sand Quarry Project Approval PA078_0094 conditions, Environmental Protection Licence 13406, and the Statement of Commitments for the project, in accordance with the Independent Audit Post Approval Requirements (DPE 2020) for the period 14 October 2020 – 23 April 2024.

The audit was conducted by The APP Group – HSEQ Systems and Auditing (APP) on 22 & 23 April 2024 with a review of the conditions of PA78_0094 and EPL13406. The audit assessed the operation of the quarry against the conditions contained within each approval. The main activities observed during the audit were extraction, screening, washing, and loading of quarried sand material.

The outcome of the audit demonstrated that Redisand maintain good controls to address environmental impacts. The independent environmental audit assessed a total of 109 conditions, comprising of a review of documents and records, interviews of key personnel and a site inspection.

2. Findings

A summary of the findings identified during the audit, including opportunities for improvement, are as follows:

- NC01** – Schedule 3 Condition 2 (Noise): Locations NB 1-4 were not monitored during calendar year 2020, and therefore Table 1 Noise Impact Criteria for NB1 during 2020 cannot be verified.

- **NC02** – Schedule 3 Condition 7 (Noise): Locations NB 1-4 were not monitored during calendar year 2020, which includes the audit scope period. The Applicant has not therefore implemented the program as approved by the Secretary.
- **NC03** – Schedule 3 Condition 8 (Air Quality): Exceedances against the Air Quality Criteria in 2020, 2021 & 2022; and missed monitoring events in 2022 triggers a non-compliance.
- **NC04** – Schedule 3 Condition 10 (Air Quality): The Air Quality Management Plan was not implemented appropriately due to the missed monitoring events across the audit period, as detailed in NC03 above.
- **NC05** – Schedule 3 Condition 17 (Groundwater): Monitoring does not include groundwater levels, but rather depth to water, measured from the Monument Height (bTOM). Therefore, noncompliance with Schedule 3, Condition 17(c). Additionally, Redisand failed to notify DPHI and EPA of arsenic levels above criteria levels in June and September 2023 monitoring reports.
- **NC06** - Schedule 3 Condition 18 (Acid Sulfate Soil): Groundwater modelling information is not included in the Acid Sulfate Soil Management Plan.
- **NC07** – Schedule 4 Condition 2 (Notification of Landowners): Landowners not notified of air quality and groundwater exceedances.
- **NC08** – Schedule 5 Condition 4 (Revision of Strategies, Plans & Programs): The Surface Water Management Plan V4 September 2021 was not updated within 3 months of the submission of the previous IEA.
- **NC09** – Schedule 5 Condition 7 (Non Compliance Notification): Two instances where non compliances were not reported as per this condition.
- **NC10** – Schedule 5 Condition 9 (Independent Environmental Audit): This audit is overdue. The IEA should have been undertaken 3 years after the previous audit (October 2023), however was postponed to early 2024.
- **NC11** - Schedule 5 Condition 11 (Access to Information): The complaints register and minutes for the Community Consultative Committee provided on the website were last updated in March 2022.
- **NC12** – Statement of Commitments Condition 3 (Vegetation Management – Offset Site): There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla.
- **NC13** - Statement of Commitments Condition 9 (Management Plans): There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla.
- **NC14** – EPL13406 Condition P1.2 (Groundwater): Monitoring does not include groundwater levels, but rather depth to water.
- **NC15** – EPL13406 Condition L3.1 (Noise Limits): Location NB1 was not monitored during calendar year 2020, and therefore Noise Impact Criteria cannot be verified.
- **NC16** – EPL13406 Condition M2.2 (Air Monitoring): Missed monitoring on 13 February and 16 November 2022.

- **OFI01** – Schedule 5 Condition 4 (Revision of Strategies, Plans & Programs): All Management Plans have a ‘change details section’ to ensure that document edits are tracked. However, it may be beneficial for each plan to include a revision history table at the front of the document to assist with checking update history.
- **OFI02** – Schedule 5 Condition 5 (Revision of Strategies, Plans & Programs): The Chair is recommending disbanding the CCC and minuted that they would write to DPE. Recommend following up with the Chair of the CCC whether this has been progressed any further.

Refer to [Section 7](#) and [Appendix D](#) for further detail and status of these findings.

3. Introduction

3.1 Background

Redisand Salt Ash Sand Quarry (Redisand) is located approximately 22 kilometres (km) west of Nelson Bay and 3 km east of Salt Ash in the Port Stephens Local Government Area (LGA). Access to the quarry is via Janet Parade off Nelson Bay Road. Since extraction commenced on site in February 2015 the site has been operated by ATB Morton Pty Ltd (ATB Morton). Redisand is located on Lot 4042 DP 1090633, Lot 632 DP 609506, and Lot 633 DP 609506. The site operates under Project Approval (PA) 07-0094 and Environment Protection Licence (EPL 13406).

The initial project approval for Redisand was approved on 29 October 2011 which allowed sand extraction operations to be undertaken until 31 December 2030. ATB Morton (trading under Redisand) has been operating the Salt Ash Sand Quarry since February 2015. A pre-operation compliance audit was undertaken by SLR in November 2014 in accordance with Condition 8 of Schedule 5 of PA 07_0094. The previous IEA for operation was undertaken by IEMA in October 2020.

PA 07-0094 has been modified on five occasions under section 75W of the *Environmental Planning and Assessment Act 1979* (EP&A Act):

- The Redisand Modification 1 (MOD 1) was approved in March 2011 to alter the intersection upgrade requirements for Nelson Bay Road and Janet Parade.
- In August 2011, Modification 2 (MOD 2) was approved to allow for an alternative biodiversity offset site in Tomalla, rather than in Markwell was originally proposed in PA 07-0094.
- Modification 3 (MOD 3) to PA 07-0094 was approved in August 2014 to redesign an acoustic bund and also involved minor changes to the biobanking agreement and calculation of the rehabilitation bond.
- Modification 4 (MOD 4) was approved in October 2018 which increased the sand product transportation rate from 201,000 to 400,000 tpa and increased laden truck movements from 3 to 3.5 truck movements per hour (averaged over the working day). MOD 4 also extended the weekday operational hours from 7:00am to 5:00pm to 6:00am to 6:00pm and altered the original sequence of extraction stages by swapping Stages 2 and 3. It should be noted that although MOD 4 has been approved, some conditions are not triggered.
- Modification 5 (MOD 5) was approved in August 2022. This modification combines the truck movement limitations imposed in Mod 3 (Sch 2, Condition 7), with the revised operating hours under Mod 4 (Sch 3, Cond 3), allowing up to 3 laden truck movements from the site per hour, averaged over a working day (6am-6pm), totalling a maximum of 36 movements per day. No physical changes or intensification in approved extraction operations form part of this Modification.

3.2 Project Details

Project Name	Salt Ash Quarry
Project Application No.:	PA07_0094
Project Address:	Janet Parade, Salt Ash
Project Phase:	Operation
Project Activity Summary:	Quarrying operations including the extraction, screening, cleaning, and loading of sand

3.3 Audit Team

Details of The APP Group independent environmental auditing team as approved by the Department of Planning, Housing, and Infrastructure (DPHI) are below. Experts in the fields of biodiversity, groundwater and rehabilitation were approved to be utilised if required. Subject Matter Experts (SME) from Ecosure Consulting (**Ecosure**) were engaged to review conditions pertaining to ecology, rehabilitation, and groundwater. The Ecosure report can be found in Appendix G and has been referred to in the overall assessment.

Name	Company	Position	Certification
Grant Brown	APP	Lead Environmental Auditor	Exemplar Global Lead Environmental Auditor – Certificate No. C461697
Dr. Natalie Toon	Ecosure	Ecology & Biodiversity Specialist	PhD, BSc
Amanda Scott	Ecosure	Ecology & Groundwater Specialist	BSc

The auditor approval letter from DPE for this audit is attached as [Appendix B](#). Independent Audit declaration forms are included as [Appendix C](#).

Sanan Qasim from the APP team undertook an auditing support role during the audit, IMS Certificate No. 14209069-9411663.

4. Audit Objectives and Scope

4.1 Audit Objectives

The objective of this audit was to undertake the scheduled 3-yearly Independent Environmental Audit of the operation in compliance with consent PA07_0094 Schedule 5, Condition 9, in accordance with the requirements for an independent audit methodology and independent audit report in the Independent Audit Post Approval Requirements (DPE, 2020).

4.2 Audit Scope

The scope of this audit comprised a review of the compliance with PA07_0094, EPL 13406 and the Statement of Commitments, including the following:

- ▶ Review of implementation of management plans, including:
 - Noise Monitoring Program
 - Air Quality Management Plan
 - Soil & Water Management Plan, including:
 - Erosion and Sediment Control Plan
 - Surface Water Monitoring Plan
 - Groundwater Monitoring Plan
 - Acid Sulfate Soil Management Plan
 - Landscape and Rehabilitation Management Plan
 - Aboriginal Cultural Heritage Management Plan
 - Traffic Management Plan
- ▶ Site inspection conducted on the 22 April 2024
- ▶ Review of the environmental performance on the project
- ▶ Review of environmental records
- ▶ Interviews with site personnel
- ▶ Consultation with stakeholders.

4.3 Audit Period

This was the third triennial Independent Environmental Audit for the project, covering the review of environmental documentation and records for the period 14 October 2020 – 23 April 2024.

5. Audit Methodology

5.1 Approval of Auditors

Letter from the Planning Secretary agreeing to the auditors is included under [Appendix B](#).

5.2 Audit Scope Development

APP developed the audit scope and a checklist based on the Project Requirements set out in consent PA07_0094 – refer to [Appendix D](#) of this report. Consultation with project stakeholders was also undertaken as part of the scope development as per [Section 4.6](#).

5.3 Audit Process

5.3.1 Opening Meeting

An opening meeting was held with personnel from Redisand and IEMA as per the Audit Attendance Sheet ([Appendix A](#)) on 22 April 2024 at 12:00pm.

Key items were discussed as follows:

- ▶ Confirmation of the purpose and scope of the audit

- ▶ Overview of the Project and status of the works
- ▶ Occurrence of environmental incidents and non-compliances, if applicable
- ▶ Overview of the audit process in accordance with the consent conditions and the Independent Audit Post Approval Requirements (DPE 2020).

5.3.2 Conduct of Audit

Audit activities included the following:

- ▶ Review of the project management plans, monitoring results and other applicable documentation to verify compliance with the PA07_0094 conditions,
- ▶ Site inspection of the quarry led jointly by Redisand and IEMA to review implementation of mitigation measures and environmental controls
- ▶ Conduct of the audit based on the checklist with the Conditions of Consent, interviews with personnel and review of records provided as evidence of compliance, and
- ▶ Discussion of any identified findings and actions noted during the site inspection.

5.3.3 Closing Meeting

The closing meeting was held on 22 April 2024 at 2:00pm with representatives of Redisand, IEMA & APP. General feedback and the audit findings were discussed during the closing meeting.

The APP auditors acknowledged the efforts made in preparing for the audit, cooperation, and openness of Redisand and IEMA personnel during the conduct of this audit.

5.4 Interviewed Persons

Name and position of persons interviewed:

Table 1 - Personnel Interviewed

Name	Organisation	Position
Grant Stevenson	Redisand	Quarry Manager
Chris Jones	IEMA	Principal Environmental Consultant
David Price	IEMA	Environmental Consultant

5.5 Site Inspection

A site inspection was carried out on 22 April 2024 from 12:30pm – 2:00pm with representatives of Redisand, IEMA and APP. No issues were identified during the site inspection. Refer to details of the inspection in [Section 7.4](#) of this report and site photos included under [Appendix F](#).

5.6 Consultation

Consultation with the Department of Planning, Housing, and Infrastructure (DPHI) was sent in advance of the audit to request feedback on the project as per IAPAR 2020 Section 3.2. DPHI requested a particular focus on monitoring and management of groundwater impacts, water management, rehabilitation of quarry stages,

monitoring and management of biodiversity at the development and offset properties and review and revision of plans, programs, and strategies.

DPHI also requested to consult with Port Stephens Council, NSW Environment Protection Authority, Department of Climate Change, Energy, the Environment and Water (Water Group) and the Community Consultative Committee for the development.

5.7 APP Response

In response to consultation feedback, APP has addressed these comments as follows:

Table 2 – Consultation comments and response

Regulatory Authority	Contact Details	Comment from Stakeholder	APP Response
DPHI	Jennifer Sage	The audit should focus on - Monitoring and management of groundwater impacts - Water management - Rehabilitation of quarry stages - Monitoring and management of biodiversity at the development and offset properties. - Review and revision of plans, programs, and strategies.	Please refer to the following: - Schedule 2 Conditions 6, 14, 17 & 18; Schedule 3 Condition 2; and EPL Conditions P1.2, O6.1 and M2.3 - Schedule 2 Conditions 14 and 16 - Schedule 2, Conditions 23 and 24 - Schedule 2 Condition 19 and 24 - Schedule 2 Condition 9, and Schedule 3 Conditions 7, 10, 14, 23, 28 and 33
DPHI	Heidi Watters	RFI-76806488 dated 14/10/24.	See Section 5.7.1 below
Port Stephens Council	Ryan Falkenmire	There is no specific concern in relation to the Salt Ash Sand Project that would inform the scope of the audit. Although, Council is mindful of potential encroachment into the vegetation buffers surrounding the extraction areas. There is known sensitive biodiversity in these areas and nearby power easement.	Please refer to Schedule 2 Condition 19 and 24, and Schedule 3 Condition 1

The NSW Environment Protection Authority, Department of Climate Change, Energy, the Environment and Water (Water Group) and the Community Consultative Committee for the development confirmed no comments in relation to the scope of the audit.

5.7.1. RFI Response

Aspect	Where addressed in report
1. Audit team The audit was not conducted by the team of experts endorsed by the Planning Secretary, which included specialists in biodiversity, groundwater and rehabilitation. NSW Planning considers that these experts should assess the conditions of approval that relate to their area of expertise, and conduct the reviews and assessments required by paragraphs 3.i and 3.iii below.	Refer to Section 3.3
Declarations of independence i. The audit report includes declarations of independence that were made by the auditors before the audit, when seeking endorsement of the audit team by the Planning Secretary. Declarations included in the audit report must be made after the audit is completed using the template at Appendix E of the IA PAR.	Statements of Declaration of Independence provided for Grant Brown (pre & post), Sanan Qasim, Dr. Natali Toon and Amanda Scott. Refer to Appendix C.
Remove from the audit report the declaration provided by Anita Rylah, who was not an approved auditor nor part of the audit team.	Statement of Declaration of Independence from Anita Rylah removed
The audit report must be revised to include: i. A review of the environmental performance of the development, including an assessment of actual impacts of the development compared to impacts predicted in the environmental impact assessment. ii. The status of implementation of findings, recommendations and actions from the previous IEA. iii. A high-level assessment of whether the environmental strategies, plans and sub-plans, or programs are adequate	Refer to: i. Section 7.1 ii. Section 7.6 iii. Section 7.7

Aspect	Where addressed in report
Evaluation of compliance i. The audit findings must be based on verifiable evidence, such as that listed in Section 3.7 of the IA PAR. Please revise the Audit Checklist at Appendix D to include the evidence used to assess the compliance status for conditions of approval. This should include but not necessarily be limited to the following conditions: a. Schedule 3 Condition 21 Rehabilitation and Landscape Management – evidence that the buffer zones have been maintained to the requirements of this condition. The audit findings have been copied from the 2022 Annual Review. b. Schedule 3 Condition 31 On-site Traffic Management – evidence that the quarry operator ensures vehicle speeds, covers loads and cleans vehicles before leaving the site, for example, signage, site procedures or codes of conduct. c. Schedule 3 Condition 36 Waste Management – evidence that processes are in place to minimise waste, for example management plans, site procedures, inspection records, audit inspection. d. Schedule 3 Condition 37 Waste Management – evidence to support the statement that no waste has originated from off-site, for example site inspection, interview, relevant management plans or strategies. e. Schedule 3 Condition 38 Dangerous Goods – evidence that dangerous goods are stored in accordance with DECC's <i>Storing and Handling Liquids: Environmental Protection – Participants Manual</i>. f. Statement of Commitment 2 Vegetation Management - Weed Management – evidence of weed management carried out at the site, including annual monitoring. g. Statement of Commitment 3 Vegetation Management - Offset Site – evidence to support the statement that monitoring has been undertaken. h. Statement of Commitment 7 Visual Impact – evidence that rehabilitation and sand extraction is in accordance with the approved staging plan.	i. Checklist in Appendix D updated to provide evidence where required a. Refer Appendix D, Schedule 3 Condition 21 - Photos of buffer zones included in Appendix F b. Refer Appendix D, Schedule 3 Condition 31 - Photos of speed signage and rumble grid in Appendix F c. Refer Appendix D, Schedule 3 Condition 36 - Photos of workshop in Appendix F, workshop inspection forms sighted, metal skip invoice sighted. d. Refer Appendix D, Schedule 3 Condition 37 - Statement from Quarry Manager that no waste from off site has been received e. Refer Appendix D, Schedule 3 Condition 38 - Photos included in Appendix F showing hazardous goods container, banded pallets and IBC's f. Refer Appendix D, SOC 2 - Refer to weed spraying records from 2021, 2022 & 2023 g. Refer Appendix D, SOC 3 - Firebird monitoring reports for offset site in 2021, 2022 & 2023 referenced. h. Refer Appendix D, SOC 7 - Statement from Quarry Manager that Progressive rehab is underway.

Aspect	Where addressed in report
Please revise the compliance status for the following conditions: - Schedule 3 Condition 29 and 29A – these conditions have not yet been triggered by increased truck movements. - Schedule 5 Condition 7 Non-compliance Notification – this condition has been assessed as being compliant, however on 23 November 2023, NSW Planning issued the quarry operator Redisand Pty Ltd (Redisand) a warning letter for failing to notify the Secretary of non-compliances. Further, the audit report identified that Redisand did not notify NSW Planning of the exceedance of groundwater criteria measured in June and September 2023. - Schedule 5 Condition 11 Access to Information – this has been assessed as compliant however at the time of our review the complaints register and minutes for the Community Consultative Committee were last updated in March 2022.	- Refer to Appendix D Schedule 3 Condition 29 and 29A – compliance changed to NT - Refer to Appendix D Schedule 5 Condition 7 - compliance changed to NC - Refer to Appendix D Schedule 5 Condition 11 - compliance changed to NC
In addition to the above RFI responses, the following sections have been updated to include specialist review and comments:	- Appendix D Schedule 3 Condition 14 - Appendix D Schedule 3 Condition 17 - Appendix D Schedule 3 Condition 18 - Appendix D Schedule 3 Condition 19 - Appendix D Schedule 3 Condition 20 - Appendix D Schedule 3 Condition 21 - Appendix D Schedule 3 Condition 22 - Appendix D Schedule 3 Condition 23 - Appendix D Schedule 3 Condition 24 - Appendix D Schedule 3 Condition 25 - Appendix D Schedule 3 Condition 26 - Appendix D Schedule 3 Condition 27 - Appendix D Statement of Commitment 1 - Appendix D Statement of Commitment 2 - Appendix D Statement of Commitment 3

Refer to [Appendix E](#) for a copy of the consultation correspondence.

5.8 Audit Compliance Status Descriptors

The following audit criteria were used for the rating of audit findings.

Table 3 - Audit Criteria

Rating	Description
Compliant	The auditor has collected sufficient verifiable evidence to demonstrate that all elements of the requirement have been complied with within the scope of the audit.
Non-Compliant	The auditor has determined that one or more specific elements of the conditions or requirements have not been complied with within the scope of the audit.
Not Triggered	A requirement has an activation or timing trigger that has not been met at the time when the audit is undertaken, therefore an assessment of compliance is not relevant.

In addition to the above descriptors, there was the option to raise Opportunities of Improvement (OFI) during this audit.

6. Document Review

- Project Approval PA07_0094
- Environmental Protection Licence 13406
- Redisand Transport Summary 2020
- Appendix C – 23 Truck Movements
- Redisand Truck Movements 2021 – 2023
- Production data 2020 - 2023
- Noise Monitoring Program v3 2021
- Air quality Management Plan v4 2022
- Soil & Water Management Plan v1 2021
- Erosion & Sediment Control Plan v1 2021
- Surface Water Management Plan v1 2021
- Groundwater Monitoring Plan v1 2021
- Acid Sulfate Soil Management Plan v1 2021
- Rehabilitation and Landscape Management Plan v5 2021
- Aboriginal Cultural Heritage Management Plan v4 2021
- Traffic Management Plan May 2019
- Noise monitoring results 2020 – 2024
- Air Quality monitoring results 2020 – 2024
- Groundwater monitoring results 2020 – 2024
- Biobanking Agreement 27/01/16
- Annual Reviews 2020 – 2023
- CCC Meeting Minutes
- IEMA Independent Environmental Audit Report 2021
- DPIE correspondence 2020 – 2023

- Submission of Plans correspondence to DPI 19/07/21
- Induction records April 2024
- Redisand induction presentation
- Maintenance records for 2012 John Deere loader
- Maintenance records for 2012 John Deere scales
- Maintenance records for 2023 Rokbak RA30 Dumper
- Maintenance records for 2022 JD Excavator E210-ii
- Septic service reports 2020 – 2024 – AWTs Maintenance Services P/L
- Weighbridge Calibration Reports 2019 – 2023 – Newcastle Weighing Services
- EPL Annual Returns 2020 - 2023

7. Audit Findings

7.1 Assessment of Compliance

This audit was completed to assess the implementation of management plans, monitoring and other environmental controls established by Redisand and IEMA for the Salt Ash Sand Quarry against Consent PA07_0094, EPL13406, and the Statement of Commitments (109 conditions in total). Overall, Salt Ash Sand Quarry achieved a medium level of compliance with the requirements of the IEA. Of the 109 conditions assessed, 64 were found to be compliant (59%), and a further 30 were deemed to be not triggered (28%). A total of 15 non-compliances (13%) have been identified.

The following table summarises the audit findings by rating category:

Table 4 - Summary of Findings

Findings Rating	Findings
Compliant	59
Non-Compliant	16
Not Triggered	34
Total	109

7.2 Notices, Incidents and Complaints

7.2.1 Notices and Incidents

The following agency Notices, Orders, Penalty Notices were recorded during the audit period. This audit includes the responses (where applicable) from the applicant. These have previously been provided in Annual Reviews for the respective periods:

2021

- Notice to Furnish Information and Records issued 20 January 2021 by DPE following a review of the 2019 Annual Review.

- Show Cause issued 19 July 2021 by DPE for failing to provide a satisfactory Annual Review since the 2016 reporting period, including the 2020 Annual Review, and for failing to comply with Schedule 3, Condition 29 of the Project Approval MOD 3 by exceeding the allowable truck movement limits in 2018 and 2019.
- Official Caution issued 26 August 2021 by DPE for failing to provide satisfactory Annual Reviews in 2017, 2018, and 2019; and
- Penalty Notice issued 26 August 2021 by DPE for failing to comply with Schedule 3, Condition 29 of Project Approval 07_0094 MOD 3 by exceeding the allowable truck movement limits in 2018 and 2019.

Redisand addressed the Show Cause in letters dated 30 July 2021 and 02 August 2021 which provided a justification that:

- The last alleged breach of truck movements was 09 March 2019, and the limit has not since been exceeded; and
- The 2020 Annual Review was a substantial improvement from previous years, showing Redisand's commitment to comply with Schedule 5, Condition 3 of PA07_0094 the DPE Guideline *Post-approval requirements for State significant mining developments, Annual Review Guideline (October 2015)*. This is supported by the follow up request for information letter from DPE dated 07 July 2021, which raised 'relatively minor points' in contrast to the previous year. Redisand re-submitted the 2020 Annual Review within the requested timeframe, which was then approved on 14 December 2021.

2022

On 21 January 2022, Redisand received a Show Cause notice with reference to historical alleged breach being failure to implement the Landscape Management Plan:

1. A pre-clearing survey was not undertaken prior to clearing of Stage 1 (which occurred between February 2015 and 4 October 2015), and the initial northwestern strip of Stage 2 (which occurred between 12 February 2019 and 13 August 2019).
2. A pre-clearing survey was not undertaken within two weeks of clearing:
 - a. The pre-clearing survey was undertaken in December 2018, and clearing for Stage 2 was undertaken from 24 to 27 September 2019, with most tree felling occurring on 24 and 25 September 2019. The LMP notes that arboreal species breed year round, and as such, a pre-clearing survey would be expected at any time of the year. This includes raptor searches, owl searches, stag watching, Anabat surveys, scat surveys or Elliot small mammal trapping being conducted as part of the pre-clearing survey.
3. An ecologist was not present during habitat tree felling of Stage 1 and the initial north western strip of Stage 2.
4. Annual rehabilitation monitoring was not undertaken by an independent specialist consultant and reporting in the 2019 and 2020 Annual Reviews, in accordance with Section 4.5.1 of the LMP.
5. Recording or reporting of nest box inspections or maintenance required have not been recorded or reported, and maintenance has not been undertaken by suitable ecologist, in accordance with Section 3.1.1 of LMP.

Also on 21 January 2022, Redisand received a Show Cause notice with reference to the following alleged breach:

The Department alleges that ATB Morton have failed to revise and resubmit a rehabilitation bond

required under Schedule 3, Condition 27 of the consent, which is required to be submitted within 3 months of the Independent Environmental Audit (IEA) being completed.

The Department notes that the latest bank guarantee for a rehabilitation bond was submitted on 22 March 2018.

The most recent 2020 IEA was dated 14 January 2021, and as such, a rehabilitation bond was required to be submitted by 14 April 2021.

Further, the Department wrote to ATB Morton on 15 February 2021 in response to the 2020 IEA findings, requiring the rehabilitation bond be submitted by 21 April 2021.

However, the Department has no record of a rehabilitation bond being submitted since 22 March 2018. Consequently, ATB Morton has failed to comply with Schedule 3, Condition 27 of the consent.

2023

On 27 November 2023, Redisand received a Warning Letter from the Department of Planning and Environment relating to a breach of Section 4.2(1) of the Environmental Planning and Assessment Act 1976. This warning letter was for breaches of Schedule 4 Condition 2 and Schedule 5 Condition 7 for failing to notify the Secretary, affected landowners and tenants of dust exceedances in May 2022 and August 2022. During the 2023 reporting period, there was no short-term dust exceedances.

7.2.2 Complaints

No complaints have been received on the project during the audit period.

7.2.3 Non-Compliances

During the audit period, the project has self-reported a total of 59 non-compliances with the Conditions of Consent. Since 2020, the project has focussed on improving their environmental compliance and has instilled an environmental consultant to provide support. The number of non-compliances reported by the project via Annual Reviews from 2020 through to 2023 has substantially decreased, down from 35 in 2020 to 4 in 2023. The project is making a concerted effort to improve their environmental performance.

7.3 Previous Audit Findings

The previous Independent Environmental Audit was undertaken on 13th October 2020. The audit identified non-compliances, with most relating to the implementation of management plans or based on administrative issues. Key issues included:

- ▶ Clearing in relation to the buffer zone;
- ▶ An issue with truck movements being above the criteria within Schedule 2 Condition 7;
- ▶ The updating and general implementation of management plans;
- ▶ Some minor non compliances regarding environmental monitoring;
- ▶ Reporting of non – compliances with approval criteria;
- ▶ Lack of detail in Annual Review reports; and
- ▶ Pre - clearance timings.

7.4 Audit Site Inspection

A site inspection was conducted of the quarry extraction areas, rehabilitation zones, and processing plant with representatives of Redisand, IEMA and APP to review the effectiveness of environmental mitigation measures implemented.

Observations of the site inspection included:

- ▶ Signage in place at Janet Parade entrance. Contains project details and contact numbers.
- ▶ Acoustic fence of the eastern side of the main entrance in good condition, dust monitoring unit in place on the western side.
- ▶ 'Cultural Heritage Area' signage throughout site.
- ▶ Poly pipe depth indicators throughout the extraction sites with blue tape marking the RL 6m level, with the objective to avoid extraction <RL 4m.
- ▶ Evidence of dust suppression on the haul roads and around the loading/unloading facilities.
- ▶ Evidence of staged extraction activities and progressive rehabilitation of these areas.
- ▶ Evidence of re-establishment of fauna furniture throughout rehabilitation zones.
- ▶ Evidence of vegetation buffer zones established throughout site and clearly signposted, as well as 50m buffer zone established either side of the Ausgrid power easement with blue flagging marking the extent.
- ▶ Sand screening and wash plant, and associated water retention basins (x2) operational.
- ▶ Evidence of cultural heritage artefacts being sorted and stored on site (under agreement with the local indigenous group).
- ▶ Workshop, site office, amenities, and maintenance facilities in good condition.
- ▶ Waste bins available throughout the site, and spill kits available.
- ▶ Weighbridge in good condition
- ▶ Designated heavy vehicle access with no mud tracking observed during inspection.
- ▶ Stabilised areas for heavy vehicles within the site boundary.

No issues were raised during the site inspection. Photos of the site inspection are included in [Appendix F](#).

7.5 Audit Findings and Recommendations

Implementation of Redisand's Management Plans were verified to be mostly in compliance with Consent PA07_0094; and monitoring was for the most part in line with the requirements under EPL 13406. However, there are numerous instances where Redisand have failed to implement the management plans in full due to a number of missed monitoring events and a number of exceedances in dust and groundwater results.

Refer to the attached [Appendix D](#) for full details of the completed audit checklist.

Sixteen non-compliances and two opportunities for improvement were identified during the audit. Findings raised, are as summarised in Table 4.

7.6 Previous Audit Recommendations

During the audit, Redisand provided an update on outstanding 2020 IEA actions. The 2020 audit was conducted by IEMA, and most actions have been completed and closed out. Evidence was provided to APP to support this. Based on a review of site information there are 4 non-conformances that are either reoccurring

items or outstanding audit actions from 2020 which have been included in the findings of this report (Section 2 and below in Table 5). The items are:

Schedule 3 Condition 17 – Groundwater Monitoring Program: Monitoring does not include groundwater levels, but rather depth to water, measured from the Monument Height (bTOM).

Schedule 4 Condition 2 – Notification of Landowners: There have been criteria exceedances in groundwater and air quality results during the IEA period which have not been notified to residents. For landowners affected by the air quality criteria exceedances, a copy of the NSW Health fact sheet entitled “*Mine Dust and You*” has not been distributed.

Schedule 5 Condition 4 – Revision of Strategies, Plans & Programs: The Surface Water Management Plan V4 September 2021 was not updated within 3 months of the submission of the previous IEA (January 2021).

Statement of Commitment 9 – Management Plans Required: There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla.

7.7 Management Plan and Monitoring Program Compliance

The Salt Ash Sand Quarry operates under the following management plans and monitoring programs:

- Noise Management Plan
- Air Quality Management Plan
- Soil & Water Management Plan:
 - Erosion and Sediment Plan
 - Surface Water Monitoring Program
 - Groundwater Monitoring Program
 - Acid Sulfate Soil Management Plan
- Landscape Management Plan:
 - Rehabilitation Management Plan
- Aboriginal Cultural Heritage Management Plan
- Traffic Management Plan

The approved management plans required by Consent PA07_0094 that were reviewed as part of this audit are assessed in [Appendix D](#)

Table 5 - Findings

Reference	Condition	Audit Findings / Recommendation
	Schedule 3 Condition 2 – Impact Assessment Criteria <i>The Applicant must ensure that the operational noise generated by the development does not exceed the noise impact assessment criteria in Table 1 at any residence on privately-owned land.</i>	Locations NB 1-4 were not monitored during calendar year 2020, and therefore Table 1 Noise Impact Criteria for NB1 during 2020 cannot be verified. No recommendation.
	Schedule 3 Condition 7 – Noise Monitoring Program <i>The Applicant must prepare a Noise Monitoring Program for the development's construction activities and quarrying operations to the satisfaction of the Secretary. This program must:</i> (a) <i>be submitted to the Secretary for approval prior to carrying out any construction activities;</i> (b) <i>include quarterly attended noise monitoring on a day on which truck dispatches meet or exceed the daily average; and</i> (c) <i>include details of how the noise performance of the development would be monitored and include a noise monitoring protocol for evaluating compliance with the noise criteria in this consent.</i> <i>The Applicant must implement the program as approved by the Secretary.</i>	Locations NB 1-4 were not monitored during calendar year 2020 (refer NC01 above), which includes the audit scope period. The Applicant has not therefore implemented the program as approved by the Secretary. No recommendation.
	Schedule 3 Condition 8 – Impact Assessment Criteria <i>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.</i>	Multiple exceedances during the audit period No recommendation.
	Schedule 3 Condition 10 – Air Quality Management Plan <i>The Applicant must implement the plan as approved by the Secretary.</i>	The Air Quality Management Plan was not implemented appropriately due to the missed

R e f e r e n c e	Condition	Audit Findings / Recommendation
04		monitoring events across the audit period, as detailed in C8 above. No recommendation.
N C 0 5	Schedule 3 Condition 17 – Groundwater Monitoring Program The Ground Water Monitoring Program must include: (c) a program to monitor ground water levels and quality.	Monitoring does not include groundwater levels, but rather depth to water, measured from the Monument Height (bTOM). Therefore, noncompliance with Schedule 3, Condition 17(c). REC01. Change the method to measure GW level.
N C 0 6	Schedule 3 Condition 18 – Acid Sulfate Soils Management Plan The Acid Sulfate Soils Management Plan must include: (a) the outcome of groundwater modelling to establish the maximum predicted groundwater level for the site	Additionally, Redisand failed to notify DPHI and EPA of arsenic levels above criteria levels in June and September 2023 monitoring reports Groundwater modelling information not found within the ASSMP. REC02. Include reference to the Groundwater Monitoring Program to address this.
N C 0 7	Schedule 4 Condition 2 - Notification of Landowners If the results of the monitoring required in schedule 3 identify that the impacts generated by the development on site are greater than the relevant impact assessment criteria, and there is no negotiated agreement in place to allow the impact, then within 2 weeks of obtaining the monitoring results the Applicant must: (a) notify the Secretary, the affected landowners and tenants (including tenants of quarry-owned properties) accordingly, and provide monitoring results to each of these parties until the results show that the development is complying with the relevant criteria in schedule 3; and in the case of exceedances of the relevant air quality criteria, send the affected	There have been criteria exceedances in groundwater and air quality results during the IEA period which have not been notified to residents. For landowners affected by the air quality criteria exceedances, a copy of the NSW Health fact sheet entitled “Mine Dust and You” has not been distributed REC03. Distribute the fact sheet to adjacent stakeholders

Reference	Condition	Audit Findings / Recommendation
	landowners and/or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).	
N C 0 8	Schedule 5 Condition 4 – Revision of Strategies, Plans & Programs <i>Within 3 months of:</i> (a) <i>the submission of an audit report under condition 8 below;</i> <i>the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.</i>	The Surface Water Management Plan V4 September 2021 was not updated within 3 months of the submission of the previous IEA (January 2021) No recommendation.
N C 0 9	Schedule 5 Condition 7 - Non Compliance Notification <i>Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the noncompliance. The notification must be in writing via the Major Projects Website and identify the development (including the development consent number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.</i>	Two instances where non compliances were not reported as per this condition.
N C 1 0	Schedule 5 Condition 9 – Independent Environmental Audit <i>By 31 December 2013, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development.</i>	This audit is overdue. The IEA should have been undertaken 3 years after the previous audit however was postponed to early 2024. No recommendation.
N C 1 1	Schedule 5 Condition 11 – Access to Information <i>From 1 November 2011, the Applicant must:</i> (a) <i>make the following information publicly available on its website:</i> <i>a copy of all approved strategies, plans and programs;</i> <i>a summary of all monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</i> <i>a complaints register, updated on a quarterly basis;</i> <i>copies of the minutes of CCC meetings;</i>	A review of publicly available information determined that the complaints register and minutes for the Community Consultative Committee were last updated in March 2022, which is non-compliant with part b of this condition. REC04. Recommend updating all publicly available documentation.

R e f e r e n c e	Condition	Audit Findings / Recommendation
	• copies of any Annual Reviews (over the last 5 years); • copies of any Independent Environmental Audit, and the Applicant's response to the recommendations in any audit; and • any other matter required by the Secretary; and (b) keep this information up-to-date, to the satisfaction of the Secretary.	
	N Appendix 3 Condition 3 – Vegetation Management – Offset Site C A vegetation management plan shall be prepared for the Offset Site. 1 2	There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla. The auditor notes however, that there is evidence of monitoring having been undertaken on site. REC05. Complete a Vegetation Management Plan for the Tomalla offset site
	N Appendix 3 Condition 9 – Management Plans Required C The following management plans shall be prepared and endorsed by the relevant authority prior to the commencement of works / operations: 1 3 • Vegetation Management Plan (Offset Site)	There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla. Recommendation as per NC11.
	N EPL13406 Section 2 Condition P1.2 C 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. 1 4	Monitoring does not include groundwater levels, but rather depth to water. Recommendation as per NC07.
	N EPL13406 Section 2 Condition L3.1 - Noise limits C Operational noise generated at the premises must not exceed the noise limits in the table below at any time.	Location NB1 was not monitored during calendar year 2020, and therefore Noise Impact Criteria cannot be verified. No recommendation.

R e f e r e n c e	Condition	Audit Findings / Recommendation
1 5		
N C 1 6	EPL13406 Section 2 Condition M2.2 – Air Monitoring Requirements	Missed monitoring on 13 February and 16 November 2022. No recommendation.
O F I 0 1	Schedule 5 Condition 4 – Revision of Strategies, Plans & Programs Within 3 months of: (a) the submission of an annual review under condition 3 above; (b) the submission of an incident report under condition 6 below; (c) the submission of an audit report under condition 8 below; and (d) any modifications to this approval, the Applicant shall review, and if necessary, revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.	All Management Plans have a 'change details section' to ensure that document edits are tracked. REC06. It may be beneficial for each plan to include a revision history table at the front of the document to assist with checking update history.
O F I 0 2	Schedule 5 Condition 5 The Applicant shall establish and operate a Community Consultative Committee (CCC) for the development in general accordance with the Community Consultative Committee Guidelines: State Significant Projects (2016, or its latest version), and to the satisfaction of the Secretary. This committee must be operating prior to the commencement of any construction activities on site. <i>Note: The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this approval. In accordance with the Guideline, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council, recognised environmental groups and the general community in the area of the development.</i>	The Chair is recommending disbanding the CCC and minuted that they would write to DPE. REC07. Follow up with the Chair of the CCC whether this has been progressed any further.

Appendix A- Audit Attendance Sheet



The APP Group

Appendix B – Approval of Auditors

NSW Planning ref: MP07_0094-PA-32

Grant Stevenson
Quarry Manager
Redisand Pty Ltd
Worimi Country
9 Janet Parade
SALT ASH NSW 2318

15/03/2024

Sent via the Major Projects Portal only

Subject: Salt Ash Quarry - Independent Audit Team Proposal

Dear Mr Stevenson

I refer to your post approval matter, MP07_0094-PA-32, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person/s to conduct an Independent Environmental Audit of the Salt Ash Sand Quarry, submitted as required by Schedule 5, Condition 9 of Project Approval 07_0094 as modified (the approval) to NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 22 January 2024.

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

Consequently, as nominee of the Planning Secretary, I endorse the following team to undertake the 2024 Independent Environmental Audit:

- Barbara Pater, Lead Auditor
- Grant Brown, Alternate Lead Auditor
- Natalie Toon, biodiversity specialist
- Amanda Scott, groundwater specialist
- Jennifer Timbs, rehabilitation specialist

Please ensure this correspondence is appended to the audit report.

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

The 2024 audit period is to be 14 October 2020 (the day after the last IEA period) to the last day of the site inspection.

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance Officer on 0400 245 170 or email compliance@planning.nsw.gov.au

Yours sincerely

A handwritten signature in black ink that reads "H Watters".

Heidi Watters
Team Leader Northern
Compliance

As nominee of the Planning Secretary

Appendix C – Independent Audit Declarations

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	Redisand Pty Ltd
Title of Audit:	Independent Environmental Audit
Date:	24 January 2024

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 have acted professionally, objectively and in an unbiased manner;
- 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 the Auditor:	Grant Brown
Signature:	
Qualification:	Environmental Auditor
Company:	APP Corporation Pty Ltd
Company Address:	29B, 10 Eagle Street, Brisbane, Qld, 4000

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	Redisand Pty Ltd
Title of Audit:	Independent Environmental Audit
Date:	31st May 2024

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

- i. the audit has been undertaken in accordance with relevant condition(s) of consent and the Independent Audit Compliance Requirements (Department 2019);
- ii. the findings of the audit are reported truthfully, accurately and completely;
- iii. I have exercised due diligence and professional judgement in conducting the audit;
- iv. I have acted professionally, objectively and in an unbiased manner;
- v. I am not related to any proponent, owner or operator of the project neither as an employer, business partner, employee, or by sharing a common employer, having a contractual arrangement outside the audit, or by relationship as spouse, partner, sibling, parent, or child;
- vi. I do not have any pecuniary interest in the audited project, including where there is a reasonable likelihood or expectation of financial gain or loss to me or spouse, partner, sibling, parent, or child;
- vii. neither I nor my employer have provided consultancy services for the audited project that were subject to this audit except as otherwise declared to the Department prior to the audit; and
- viii. I have not accepted, nor intend to accept any inducement, commission, gift or any other benefit (apart from payment for auditing services) from any proponent, owner or operator of the project, their employees or any interested party. I have not knowingly allowed, nor intend to allow my colleagues to do so.

Notes:

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

Name of the Auditor:	Grant Brown
Signature:	
Qualification:	Environmental Auditor
Company:	APP Corporation Pty Ltd
Company Address:	29B, 10 Eagle Street, Brisbane, Qld, 4000

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	Redisand Pty Ltd
Title of Audit:	Independent Environmental Audit
Date:	24 January 2024

I declare that:

- 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;
- 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;
- 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;
- I have acted professionally, objectively and in an unbiased manner;
- 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:

- 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
- 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 the Auditor:	Sanan Qasim
Signature:	
Qualification:	Environmental Auditor
Company:	APP Corporation Pty Ltd
Company Address:	Level 14, 10 Spring Street, Sydney NSW 2000

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	WPP Planning & Property
Title of Audit:	Independent Environmental Audit
Date:	19 November 2024

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 have acted professionally, objectively and in an unbiased manner;
- 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 the Auditor:	Dr Natalie Toon
Signature:	
Qualification:	PhD, Bsc
Company:	Ecosure
Company Address:	2/34 Thomson Street, Bowen Hills, QLD 4006

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	WPP Planning & Property
Title of Audit:	Independent Environmental Audit
Date:	19 November 2024

I declare that:

- ii. 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;
- iii. 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;
- iv. 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;
- v. I have acted professionally, objectively and in an unbiased manner;
- vi. 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:

- b. 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
- c. 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 the Auditor:	Amanda Scott
Signature:	
Qualification:	BSc
Company:	Ecosure
Company Address:	2/34 Thomson Street, Bowen Hills, QLD 4006

Appendix D – Audit Checklist

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
1.	SCHEDULE 2: ADMINISTRATIVE CONDITIONS			
1.1.	1.	Obligation to minimise harm to the environment <i>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 and/or minimise any material harm to the environment that may result from the construction, operation or rehabilitation of the development.</i>	There have been no incidents causing material harm during the audit period	C
1.2.	2.	Terms of Approval <i>The Applicant must carry out the development:</i> (a) <i>in compliance with the conditions of this consent;</i> (b) <i>in accordance with the statement of commitments in Appendix 3;</i> (c) <i>in accordance with all written directions of the Secretary; and</i> (d) <i>generally in accordance with the EA, EA (MOD1), EA (MOD 2), EA (MOD 3), EA (MOD 4) and EA (MOD 5).</i>	The auditor was provided copies of correspondence from the Department to the Applicant. A number of Official Caution, Show Cause, and Warning letters were provided to the Applicant throughout the audit period, however several of these pertained to matters out with the current audit period. Furthermore, the actions required of the auditee to address the most recent Department correspondence have been fulfilled. The auditor is satisfied that the applicant is genuinely striving to meet all conditions of consent.	C
1.3.	3.	<i>Consistent with the requirements in this consent, the Secretary may make written directions to the Applicant in relation to:</i> (a) <i>the content of any strategy, study, system, plan, program, review, audit, notification, report or correspondence submitted under or otherwise made in relation to this consent, including those that are required to be, and have been, approved by the Secretary; and</i> (b) <i>the implementation of any actions or measures contained in any such document referred to in condition 3(a).</i>	As above. The Secretary has made written directions to be implemented by the Applicant. Evidence provided to the auditor suggests that the Applicant has obliged with these directions.	C
1.4.	4.	<i>The conditions of this consent and directions of the Secretary prevail to the extent of any inconsistency, ambiguity or conflict between them and a document/s listed in condition 2. In the event of an inconsistency, ambiguity or conflict between any of the document/s listed in condition 2, the most recent document prevails to the extent of the inconsistency, ambiguity or conflict.</i>	Note that there have been no inconsistencies, ambiguities or conflict between the project and the documents listed in condition 2.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
1.5.	5.	Limits on Consent <i>Quarrying operations may take place on the site until 31 December 2030.</i> <i>Note: Under this consent, the Applicant is required to rehabilitate and revegetate the site and provide and implement a Biodiversity Offset Strategy to the satisfaction of the Secretary. Consequently, this consent will continue to apply in all other respects other than the right to conduct quarrying operations until the site has been rehabilitated and revegetated and the biodiversity offset strategy implemented to a satisfactory standard.</i>	Quarrying operations commenced in February 2015	C
1.6.	6.	<i>The Applicant must not extract sand or other extractive materials or carry out any work in the extraction area below a level of 1 m above the maximum predicted groundwater level (see condition 18 of schedule 3), other than the construction of any bores approved by DPE Water.</i>	Poly-pipe markers throughout site indicate the surveyed 6m RL mark to avoid extraction below RL 4m. Excavation does not extend beyond the 6m RL mark.	C
1.7.	7.	<i>Until such time as the road upgrades required under either condition 29 or condition 29A of Schedule 3 are completed, the Applicant must not transport more than:</i> <i>(a) 30 laden trucks per day, Monday to Friday between 7:00 am and 5:00 pm; and</i> <i>(b) 15 laden trucks per day on Saturdays between 8:00 am and 1:00 pm.</i>	Evidence of truck movements for the audit period was provided (2021 to 2024) and there is no evidence that truck movements have exceeded 30 trucks per day Monday to Friday, or 15 trucks per day on Saturdays.	C
1.8.	7A.	<i>Following the completion of the road upgrades required under condition 29 of Schedule 3, the Applicant must not transport more than:</i> <i>(a) 36 laden trucks per day, Monday to Friday between 6:00 am and 6:00 pm; and</i> <i>(b) 15 laden trucks per day on Saturdays between 8:00 am and 1:00 pm.</i>	NA. Truck movements have been kept to those set out in C1.7 above	C
1.9.	7B.	<i>Following the completion of the road upgrades required under condition 29A of Schedule 3, the Applicant must not transport more than:</i> <i>(a) 4 laden trucks per hour;</i>	NA. Truck movements have been kept to those set out in C1.7 above	C

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		(b) 42 laden trucks per day, Monday to Friday between 6:00 am and 6:00 pm; and (c) 18 laden trucks per day on Saturdays between 8:00 am and 1:00 pm.		
1.10.	8.	The Applicant must not transport more than 400,000 tonnes of extractive materials from the site in a calendar year.	Records provided for each calendar year: 2019-2020: 198,473t 2020-2021: 228,560t 2021-2022: 204,207t 2022-2023: 183,000t	C
1.11.	9.	STAGED SUBMISSION OF ANY STRATEGY, PLAN OR PROGRAM With the approval of the Secretary, the Applicant may: (a) prepare and submit any strategy, plan or program required by this consent on a staged basis (if a clear description is provided as to the specific stage and scope of the development to which the strategy, plan or program applies, the relationship of the stage to any future stages and the trigger for updating the strategy, plan or program); NSW Government Department of Planning & Environment 6 (b) combine any strategy, plan or program required by this consent (if a clear relationship is demonstrated between the strategies, plans or programs that are proposed to be combined); (c) update any strategy, plan or program required by this consent (to ensure the strategies, plans and programs required under this consent are updated on a regular basis and incorporate additional measures or amendments to improve the environmental performance of the development); and (d) stage or update a strategy, plan or program without consultation being undertaken with all parties required to be consulted in the relevant condition in this consent.	There is evidence of consultation with DPHI with regards to management plan submissions on 19 July 2021.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
1.12.	10.	Protection of Public Infrastructure <i>The Applicant must:</i> (a) <i>repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the development; and</i> (b) <i>relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development.</i>	There has been no damage to public infrastructure.	C
1.13.	11.	Structural Adequacy <i>The Applicant must ensure that any 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> <i>Notes:</i> • <i>Under Part 4A of the EP&A Act, the Applicant is required to obtain construction and occupation certificates for the proposed building works.</i> • <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the development.</i>	There have been no new buildings or structures, alterations, or additions within the audit period.	C
1.14.	12.	Operation of Plant and Equipment <i>The Applicant must ensure that all plant and equipment used at the site, or to transport extractive materials from the site, is:</i> (a) <i>maintained in a proper and efficient condition; and</i> (b) <i>operated in a proper and efficient manner.</i>	Maintenance records for 2012 John Deere 824K Loader, 2014 John Deere 824K, 2023 Rokbak RA30 Dump Truck, and 2022 John Deere Excavator E210-II provided. Note that new dump truck will receive 500hr service Thursday 02/05/24. Evidence of weigh bridge calibrations undertaken during the audit period were provided. All calibration tests conducted 15 June 2021, 22 July 2022, 31 May 2023 & 15 August 2023 passed. All plant and machinery is regularly maintained.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
1.15.	13.	Section 94 Contributions <i>For the life of the development, the Applicant must pay Council \$0.10 per tonne of extractive material transported from the site on a quarterly basis, in accordance with Council's Section 94 Contributions Plan 2007 for the maintenance of Janet Parade, Salt Ash. Each payment must be;</i> (a) <i>based on weighbridge records of the quantity of extractive material transported from the site in the relevant quarter;</i> (b) <i>paid within 21 days of the end of the relevant quarter;</i> (c) <i>adjusted in line with the Consumer Price Index calculated from the date of consent and applied annually from the first day of operation.</i>	A total of \$103,492.23 has been paid for the period 21 January 2020 to 9 April 2024. These payments were made every quarter. Evidence of these payments was provided to the auditor.	C
1.16.	14.	Evidence of Consultation <i>Where conditions of this consent require consultation with an identified party, the Applicant must:</i> (a) <i>consult with the relevant party prior to submitting the subject document to the Secretary for approval; and</i> (b) <i>provide details of the consultation undertaken including:</i> (i) <i>the outcome of that consultation, matters resolved and unresolved; and</i> (ii) <i>details of any disagreement remaining between the party consulted and the Applicant and how the Applicant has addressed the matters not resolved.</i>	Environmental Assessment titled Salt Ash Sand Quarry Modification 5 – Trucking Hours (MP 07_0094), dated September 2021 and supporting documentation titled RE: Proposed Modification to Major Projects Approval No. MP 07_0094-Mod4 'Salt Ash Sand Quarry, dated 16 June 2022 provided to DPHI.	C
1.17.	15.	Compliance <i>The Applicant must ensure that all employees, contractors and sub-contractors are made aware of, and instructed to comply with, the conditions of this consent relevant to activities they carry out in respect of the development.</i>	Evidence of Induction was provided. The induction provides content on the main conditions of the consent relevant to the activities carried out by project staff, i.e. dust control, noise, water management, cultural heritage, habitat, adverse weather, erosion, and sediment. Attendance records were also provided as evidence.	C
1.18.	16.	Applicability of Guidelines	Noted	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>References in the conditions of this consent to any guideline, protocol, Australian Standard or policy are to such guidelines, protocols, standards or policies in the form they are in as at the date of this consent.</i>		
1.19.	17.	<i>However, consistent with the conditions of this consent and without altering any limits or criteria in this consent, the Secretary may, when issuing directions under this consent in respect of ongoing monitoring and management obligations, require compliance with an updated or revised version of such a guideline, protocol, standard or policy, or a replacement of them.</i>	Noted	C
2.	SCHEDULE 3: ENVIRONMENTAL PERFORMANCE CONDITIONS			
2.1.	1.	Identification of Boundaries <i>Prior to the commencement of quarrying operations, the Applicant must:</i> (d) <i>engage a registered surveyor to mark out the boundaries of the approved limits of extraction;</i> (e) <i>submit a survey plan of these boundaries to the Secretary; and</i> (f) <i>ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits.</i>	Survey records provided. Survey of the boundaries of the approved extraction limits undertaken by Earth Surveying Consulting Surveyors sighted. This survey was undertaken prior to quarrying operations commencing. A Buffer Plan which includes the location of power easement zones and sensitive environment zones was sighted. The buffer zones and limit of the approved extraction areas was clearly signposted on site, indicated with large red & white signage and regular intervals. Refer photo Appendix F	C
NOISE				
2.2.	2.	Impact Assessment Criteria <i>The Applicant must ensure that the operational noise generated by the development does not exceed the noise impact assessment criteria in Table 1 at any residence on privately-owned land.</i>	Noise Monitoring Program (NMP) Table 6 “Noise Impact Assessment Criteria” outlines the criteria to ensure that operational noise generated does not exceed specified limits.	NC01

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating																					
		Table1: Noise Impact Assessment Criteria <table><tr><th>Receiver</th><th>Morning shoulder period 6:00 am – 7:00 am L_{Aeq} (15 min) dB(A)</th><th>Day 7:00 am – 6:00 pm L_{Aeq} (15 min) dB(A)</th></tr><tr><td>JP1</td><td>35</td><td>40</td></tr><tr><td>JP2</td><td>35</td><td>43</td></tr><tr><td>JP3</td><td>35</td><td>39</td></tr><tr><td>JP4</td><td>35</td><td>37</td></tr><tr><td>NB1</td><td>35</td><td>36</td></tr><tr><td>All other receivers</td><td>35</td><td>35</td></tr></table> Notes: (a) Receiver locations are shown in the Figure in Appendix 2; and (b) Noise generated by the development is to be measured in accordance with the relevant procedures and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy.	Receiver	Morning shoulder period 6:00 am – 7:00 am L _{Aeq} (15 min) dB(A)	Day 7:00 am – 6:00 pm L _{Aeq} (15 min) dB(A)	JP1	35	40	JP2	35	43	JP3	35	39	JP4	35	37	NB1	35	36	All other receivers	35	35	As per Condition 7, locations NB 1-4 were not monitored during calendar year 2020, and therefore Table 1 Noise Impact Criteria for NB1 during 2020 cannot be verified This was nominated in the Annual Review and has since been addressed, therefore no recommendations.	
Receiver	Morning shoulder period 6:00 am – 7:00 am L _{Aeq} (15 min) dB(A)	Day 7:00 am – 6:00 pm L _{Aeq} (15 min) dB(A)																							
JP1	35	40																							
JP2	35	43																							
JP3	35	39																							
JP4	35	37																							
NB1	35	36																							
All other receivers	35	35																							
2.3.	3.	Hours of Operation The Applicant must comply with the operating hours in Table 2. Table 2: Operating Hours <table><tr><th>Day</th><th>Construction Activities</th><th>Quarrying Operations*</th><th>Maintenance (only if inaudible at privately-owned residences)</th></tr><tr><td>Monday – Friday</td><td>7:00 am to 6:00 pm</td><td>6:00 am to 6:00 pm</td><td>Any time</td></tr><tr><td>Saturday</td><td>8:00 am to 1:00 pm</td><td>8:00 am to 1:00 pm</td><td>Any time</td></tr><tr><td>Sundays and Public Holidays</td><td>No construction activities</td><td>No quarrying operations</td><td>Any time</td></tr></table> * Truck movements are further limited by the hours set out in conditions 7, 7A and 7B of Schedule 2	Day	Construction Activities	Quarrying Operations*	Maintenance (only if inaudible at privately-owned residences)	Monday – Friday	7:00 am to 6:00 pm	6:00 am to 6:00 pm	Any time	Saturday	8:00 am to 1:00 pm	8:00 am to 1:00 pm	Any time	Sundays and Public Holidays	No construction activities	No quarrying operations	Any time	Copies of weigh bridge/truck movements provided. All truck movements are in line with the prescribed operating hours.	C					
Day	Construction Activities	Quarrying Operations*	Maintenance (only if inaudible at privately-owned residences)																						
Monday – Friday	7:00 am to 6:00 pm	6:00 am to 6:00 pm	Any time																						
Saturday	8:00 am to 1:00 pm	8:00 am to 1:00 pm	Any time																						
Sundays and Public Holidays	No construction activities	No quarrying operations	Any time																						
2.4.	4.	Additional Noise Mitigation Measures Upon receiving a written request from the owner of: (a) residence JP2; or (b) any residence on Janet Parade, where noise monitoring shows that the noise generated by the	There were no written requests from residence JP2 or other Janet Parade residents	C																					

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		development is greater than or equal to 43 dB(A) LAeq (15 minute), the Applicant must implement additional noise mitigation measures (such as double glazing, insulation, and/or air conditioning) at the residence in consultation with the landowner. These measures must be reasonable and feasible. If within 3 months of receiving this request from the owner, the Applicant and the owner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Secretary for resolution.		
2.5.	5.	Continuous Improvement The Applicant must: (a) implement all reasonable and feasible noise mitigation measures; (b) investigate ways to reduce the noise generated by the development; and (c) report on these investigations and the implementation and effectiveness of these measures in the Annual Review, to the satisfaction of the Secretary.	Noise Monitoring Program (NMP) Version 3 dated September 2021. (a) NMP section 9 “Noise Management” outlines the key noise controls which are implemented at the site. (b) NMP section 11 “Review and Improvement” – Investigation takes place during Annual Review NMP section 11 “Review and Improvement” – Implementation and effectiveness of the controls are included in the annual review report.	C
2.6.	6.	Construction Noise Management Plan The Applicant must prepare and implement a Construction Noise Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval prior to carrying out any construction activities on the site; (b) include: • identification of each work area and access route; • identification of the specific activities that would be carried out and associated noise sources and access routes;	No longer applicable as construction has been completed. There was no construction within the audit period.	NT

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		- the construction noise and vibration objectives identified in the EA; - assessment of potential noise and vibration impacts from the proposed construction methods (including noise from construction traffic) against the objectives identified in the EA; - where objectives are predicted to be exceeded, an analysis of reasonable and feasible noise mitigation measures that can be implemented to reduce construction noise impacts; - description of management methods and procedures and specific noise mitigation measures that would be implemented to control noise and vibration during construction operations, including the early erection of operational noise control barriers and alternatives to reversing alarms and the measures identified in Section 8 of the Applicant's Statement of Commitments in Appendix 3; - procedures to notify residents of construction operations that are likely to affect their noise and vibration amenity; and - measures to receive, record and monitor complaints.		
2.7.	7.	Noise Monitoring Program The Applicant must prepare a Noise Monitoring Program for the development's construction activities and quarrying operations to the satisfaction of the Secretary. This program must: - be submitted to the Secretary for approval prior to carrying out any construction activities; - include quarterly attended noise monitoring on a day on which truck dispatches meet or exceed the daily average; and	Sighted Noise Monitoring Program (NMP) Version 3 dated September 2021. - The NMP was submitted to the Secretary on 19 July 2021 - NMP section 8 "Monitoring Frequency" outlines the quarterly noise monitoring frequency during weekdays where truck dispatches meet or exceed the daily average. - NMP section 8.1 "Data Recording and Monitoring" outlines the monitoring of noise performance and evaluating compliance against the impact assessment criteria.	NC02

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating																			
		(c) include details of how the noise performance of the development would be monitored and include a noise monitoring protocol for evaluating compliance with the noise criteria in this consent. The Applicant must implement the program as approved by the Secretary.	Locations NB 1-4 were not monitored during calendar year 2020, which includes the audit scope period. The Applicant has not therefore implemented the program as approved by the Secretary. This was nominated in the Annual Review and has since been addressed, therefore no recommendations.																				
AIR QUALITY																							
2.8.	8.	Impact Assessment Criteria 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. Table 3: Air Quality Criteria <table><tr><th>Pollutant</th><th>Averaging period</th><th>Criterion</th></tr><tr><td rowspan="2">Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td>^{a, c} 25 µg/m³</td></tr><tr><td>24 hour</td><td>^b 50 µg/m³</td></tr><tr><td rowspan="2">Particulate matter < 2.5 µm (PM_{2.5})</td><td>Annual</td><td>^{a, c} 8 µg/m³</td></tr><tr><td>24 hour</td><td>^b 25 µg/m³</td></tr><tr><td>Total suspended particulate (TSP) matter</td><td>Annual</td><td>^{a, c} 90 µg/m³</td></tr><tr><td>^d Deposited dust</td><td>Annual</td><td>^b 2 g/m²/month ^a 4 g/m²/month</td></tr></table> Note: - Total impact (i.e. incremental increase in concentrations due to the development plus background concentrations due to all other sources). - Incremental impact (i.e. incremental increase in concentrations due to the development on its own). - Excludes extraordinary events such as bushfires, prescribed burning, dust storms, fire incidents or any other activity agreed by the Planning Secretary.	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM ₁₀)	Annual	^{a, c} 25 µg/m ³	24 hour	^b 50 µg/m ³	Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a, c} 8 µg/m ³	24 hour	^b 25 µg/m ³	Total suspended particulate (TSP) matter	Annual	^{a, c} 90 µg/m ³	^d Deposited dust	Annual	^b 2 g/m ² /month ^a 4 g/m ² /month	2021: PM2.5 exceeded the approved criteria of 25µg/m3 on 13 May and 06 July 2021 recording 37µg/m3 and 34 µg/m3 respectively. This resulted in an annual average of 9.8 µg/m3 which exceeds the approved limit of 8µg/m3. 2022: PM2.5 exceeded the approved criteria of 25µg/m3 on 26 May 2022 recording 34 µg/m3 and 43 µg/m3 on 18 August 2022. PM10 exceeded the approved criteria on 18 August 2022 with 58µg/m3. Missed monitoring on 13 February and 16 November 2022. 2023: PM2.5 annual average criteria of 8µg/m3 was exceeded (8.3µg/m3). Project self-reported all exceedances and reported in their Annual Reviews Dust deposition gauges sighted by the auditor. All DDG's installed as per AS3580.10	NC03
Pollutant	Averaging period	Criterion																					
Particulate matter < 10 µm (PM ₁₀)	Annual	^{a, c} 25 µg/m ³																					
	24 hour	^b 50 µg/m ³																					
Particulate matter < 2.5 µm (PM _{2.5})	Annual	^{a, c} 8 µg/m ³																					
	24 hour	^b 25 µg/m ³																					
Total suspended particulate (TSP) matter	Annual	^{a, c} 90 µg/m ³																					
^d Deposited dust	Annual	^b 2 g/m ² /month ^a 4 g/m ² /month																					

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method.		
2.9.	9.	Dust Management <i>The Applicant must maintain the site in a condition that minimises or prevents the emission of dust or sand from the site, including the prompt and effective rehabilitation of all disturbed areas, to the satisfaction of the Secretary.</i>	AQMP section 9 “Air Quality Management System” and section 10 “Trigger Action Response Plan” outlines the controls to minimise or prevents the emission of dust or sand from the site. Dust on site is managed with regular application of water onto haul roads and working stockpiles	C
2.10.	10.	Air Quality Management Plan <i>Within 3 months of approval of Modification 4, the Applicant must prepare an Air Quality Management Plan for the development to the satisfaction of the Secretary. This plan must:</i> <i>be prepared by a suitably qualified and experienced person/s;</i> <i>be prepared in consultation with the EPA;</i> <i>describe the measures to be implemented to ensure:</i> <i>compliance with the air quality criteria and operating conditions in this consent;</i> <i>best practice management is being employed; and</i> <i>air quality impacts of the development are minimised during adverse meteorological conditions and extraordinary events;</i> <i>describe the air quality management system; and</i> <i>include an air quality monitoring program that:</i> <i>is capable of evaluating the performance of the development against the air quality criteria;</i> <i>adequately supports the air quality management system; and</i> <i>includes a protocol for identifying any air quality-related exceedance, incident or non-compliance and</i>	Sighted Air Quality Management Plan (AQMP) Version 4 dated January 2022. - AQMP is Prepared by VGT Environmental Compliance Solutions. AQMP Appendix D – Letter from DPHI Re: “Salt Ash Quarry (MP 07_0094) Request for Endorsement of Expert” states that the Department is satisfied that the AQMP has been prepared by suitably qualified and experienced person. - AQMP Appendix B “Consultation with EPA” and section 2 “Consultation” confirms that AQMP has been prepared in consultation with the EPA. - AQMP section 9 “Air Quality Management System” and section 10 “Trigger Action Response Plan” outlines the measures to be implemented. - AQMP section 9 “Air Quality Management System” - AQMP section 8 “Air Quality Monitoring Program” and section 11 “Reporting and Compliance” outlines the monitoring program includes evaluation of performance of the development and protocols for identifying any air quality related exceedances, incident, or non-compliance. The Air Quality Management Plan was not implemented appropriately due to the missed monitoring events across the audit period, as detailed in C8 above.	NC04

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		for notifying the Department and relevant stakeholders of these events. The Applicant must implement the plan as approved by the Secretary.	This was nominated in the Annual Review and has since been addressed, therefore no recommendations.	
SOIL AND WATER				
2.11.	11.	Pollution of Waters Except as may be expressly provided for by an EPL, the Applicant must comply with section 120 of the Protection of the Environment Operations Act 1997 in carrying out the development.	No water discharges from site. All water reused for dust suppression or recycled through the wash plant and stored in two basins.	C
2.12.	12.	Wastewater Treatment The Applicant must manage on-site sewage to the satisfaction of Council and BCD. The facility must comply with the requirements of the Environment and Health Protection Guidelines – On-site Sewage Management for Single Households (1998), or latest version.	The septic system is serviced annually and operates in line with the current guidelines.	C
2.13.	13.	Soil Management All earthworks, including acoustic bunding works, must be contained wholly within the site.	Site inspection confirmed that all works remain within the site	C
2.14.	14.	Management and Monitoring The Applicant must prepare a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with DPE Water; (b) include a(n): • Erosion and Sediment Control Plan; • Surface Water Monitoring Program;	Specialist input for this condition: Sighted Soil and Water Management Plan (Redisand 2021b) a) Section 2 – Consultation b) Appendix A - Erosion and Sediment Control Plan - Appendix B - Surface Water Monitoring Program - Appendix C – Groundwater Monitoring Program - Appendix D - Acid Sulfate Soils Management Plan c) The SWMP was submitted to the Secretary prior to quarrying operations commencing.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		- Groundwater Monitoring Program; - Acid Sulfate Soils Management Plan; and (c) be submitted to the Secretary for approval prior to commencing quarrying operations, and to carrying out any construction activities in the case of the Erosion and Sediment Control Plan. The Applicant must implement the plan as approved by the Secretary.	Annual Reviews 2020 – 2023 (Redisand 2021e – 2024). The Soil and Water Management Plan has been developed in compliance with the consent condition. The SWMP was submitted to the Secretary prior to quarrying operations commencing, with Version 1 again submitted on 21 July 2021. Evidence from the Annual Review reports between 2020 and 2023 demonstrate that the Soil and Water Management Plan is being implemented.	
2.15.	15.	The Erosion and Sediment Control Plan must: (a) be consistent with the requirements of Managing Urban Stormwater, Soils and Construction Volume 2E Mines and Quarries, (Commonwealth Government), or the latest edition; (b) identify activities that could cause soil erosion and generate sediment; (c) describe measures to minimise soil erosion and the potential for the transport of sediment off site; (d) describe the location, function, and capacity of erosion and sediment control structures; and (e) describe what measures would be implemented to maintain these structures over time.	Sighted Erosion and Sediment Control Plan (ESCP) Version 1 dated September 2021. (a) Refer to ESCP section 3 “Erosion and Sediment Control Process” (b) Refer to ESCP section 2 “Existing Site Characteristics” (c) Refer to ESCP section 3 “Erosion and Sediment Control Process” (d) Refer to ESCP section 3 “Erosion and Sediment Control Process” (e) Refer to ESCP section 4 “Maintenance”	C
2.16.	16.	The Surface Water Monitoring Program must include: (a) detailed baseline data on surface water quality; (b) surface water impact assessment criteria; (c) a program to monitor surface water quality; and (d) a protocol for the investigation, notification and mitigation of identified exceedances of the surface water impact assessment criteria.	Sighted Surface Water Monitoring Plan (SWMP) Version 1 dated September 2021. (a) SWMP Appendix 1 “Baseline Water Results” provide the detailed table with the baseline data on surface water quality for Feed Pond, Settled Pond, and Creek. (b) Refer to SWMP section 2.4 “Water Quality Criteria” (c) Refer to SWMP section 2.3 “Monitoring and Sampling Methodology” (d) Refer to SWMP section 3 “Contingencies”	C
2.17.	17.	The Ground Water Monitoring Program must include: (a) detailed baseline data on groundwater levels and quality, based on statistical analysis;	Specialist input for this condition: Sighted Groundwater Monitoring Plan (Redisand 2021b) a) Section 2 - Groundwater Data	NC05

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(b) groundwater impact assessment criteria; (c) a program to monitor ground water levels and quality; (d) a program to monitor ground water level effects on groundwater dependent vegetation, and (e) a protocol for the investigation, notification and mitigation of identified exceedances of the groundwater impact assessment criteria.	b) Section 4.4 - Water Level and Quality Criteria c) Section 4.2 - Frequency of Monitoring and Sampling, and Section 4.3 - Monitoring and Sampling Methodology d) Section 4.3 includes groundwater dependent vegetation e) Section 5 "Contingencies." The following non-compliances were recorded in the 2023 Annual Review (Redisand 2024): - Redisand has recorded an administrative non-compliance for Schedule 3, Condition 17, as the current groundwater monitoring does not include groundwater levels, but rather depth to water, measured from the Monument Height. Therefore, noncompliance with Schedule 3, Condition 17(c). - Redisand failed to notify DPHI and the Environment Protection Authority of arsenic levels above criteria levels in June and September 2023 monitoring reports. It is noted that no monitoring occurred at borehole (BH) 1 between 2020 and Q2 2022 as the well was lost to quarrying operations. In addition, only one sample was collected from BH6 between 2020 and 2023 due to dry conditions. If dry conditions continue at this BH, Ecosure recommend an assessment by a hydrogeologist to ascertain if there is a more suitable BH location.	
2.18.	18.	The Acid Sulfate Soils Management Plan must include: (a) the outcome of groundwater modelling to establish the maximum predicted groundwater level for the site; (b) measures to avoid the extraction of acid sulfate soils and potentially acid sulfate soils; and (c) a contingency plan to manage any acid sulfate soils and potentially acid sulfate soils inadvertently encountered during extraction and processing operations.	(a) Specialist input for this condition: Sighted Acid Sulfate Soil Management Plan (Redisand 2021b) a) n/a b) Section 5 - Monitoring Plan and Procedures c) Section 6 – Contingencies. The predicted maximum groundwater level is stated in the Acid Sulfate Soil Management Plan, however the outcome of modelling is not found within the report. The Ground Water Monitoring Program states that no specific groundwater modelling carried out on this site, and instead results of groundwater level modelling from a neighbouring site are considered appropriate to use. It is recommended that endorsement from DPHI is sought for this approach.	NC06

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating				
		REHABILITATION AND LANDSCAPING						
2.19.	19.	Biodiversity Offset Strategy By 1 February 2015, the Applicant must: (a) enter into a Biobanking agreement for the offset area with the Minister for Environment and Heritage, in accordance with Part 7A of the Threatened Species Conservation Act 1995, to implement the Biodiversity Offset Strategy summarised in Table 6; (b) ensure that adequate resources are dedicated towards the implementing the Biodiversity Offset Strategy; and (c) provide appropriate long term security for this offset; to the satisfaction of the Secretary. Table 6: Biodiversity Offset Strategy <table><tr><th>Offset</th><th>Minimum number of Ecosystem Credits to be retired</th></tr><tr><td>Tomalla offset site</td><td>1857</td></tr></table> Note: the Tomalla offset site is shown in the Figure in Appendix 4.	Offset	Minimum number of Ecosystem Credits to be retired	Tomalla offset site	1857	Specialist input for this condition: The timing trigger is not within the temporal scope of this audit.	NT
Offset	Minimum number of Ecosystem Credits to be retired							
Tomalla offset site	1857							
2.20.	20.	Rehabilitation and Landscape Management The Applicant must rehabilitate the site to the satisfaction of the Secretary.	Specialist input for this condition: Sighted Landscape and Rehabilitation Management Plan (Redisand 2021a), Annual Reviews 2020 – 2023 (Redisand 2021e – 2024). Compliance with this condition cannot be assessed until the operational phase of the project is complete, however in accordance with the Landscape and Rehabilitation Management Plan, Redisand is required to progressively rehabilitate and stabilise disturbed areas during the operational phase. Evidence from the Annual Review reports between 2020 and 2023 demonstrate that rehabilitation is being implemented.	NT				
2.21.	21.	The Applicant must maintain, except for the purposes of access to the areas of quarrying operations as shown in Figure 1 of Appendix 1:	Specialist input for this condition: Sighted the Landscape and Rehabilitation Management Plan (Redisand 2021a), Annual Reviews 2020 – 2024 (Redisand 2021e – 2024).	C				

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(a) a minimum 50 metre buffer of undisturbed vegetation between extraction areas and the nearest edge of BCD estate; (b) a minimum 50 metre buffer of undisturbed vegetation between the extraction areas and any Swamp Sclerophyll Forest EEC; (c) a minimum 50 metre buffer of undisturbed vegetation on each side of the northern power line easement on the development site. (d) a minimum 30 metre buffer of undisturbed vegetation between the extraction areas and the boundary of the site, unless a private agreement exists with the relevant landowner to reduce this buffer adjacent to that relevant landowner's property and a copy of this agreement is provided to the Department; (e) minimum 30 metre buffer of undisturbed vegetation on the northern margin of the extraction areas; and (f) a buffer of undisturbed vegetation on land below 8 m AHD on the northern margin of quarrying operations.	The following non-compliances were recorded in the 2023 Annual Review (Redisand 2024): · There have been historical non-compliance regarding buffer zone boundaries and since 2020, Redisand has been consulting with DPHI to modify their original EA so that they can rectify these issues. This consultation is still ongoing. In the meantime, Redisand continues to maintain the area around the buffer zones and report the progress in the Annual Reviews. Auditor note: The site inspection confirmed that buffer zones are being maintained as per the requirements of this condition. Refer to photos in Appendix F.	
2.22.	22.	Prior to the commencement of quarrying operations, the Applicant must establish, and subsequently vegetate and maintain: (a) a 6 metre high acoustic bund around the development's fixed plant; and (b) a 3 metre high acoustic fence along the southern boundary of the quarry access road, (c) to the satisfaction of the Secretary Note: The vegetated bunds must be detailed in the Landscape Management Plan	Specialist input for this condition: The timing trigger is not within the temporal scope of this audit.	NT
2.23.	23.	Landscape Management Plan The Applicant must prepare a Landscape Management Plan for the development to the satisfaction of the Secretary. This plan must: (a) be prepared:	Specialist input for this condition: Sighted Landscape and Rehabilitation Management Plan (Redisand 2021). ▪ Section 4.1, Table 2 – Statutory Requirements • Section 4.1, Table 2 – Statutory Requirements	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		- by suitably qualified person(s), approved by the Secretary; and - in consultation with Council; (b) be submitted to the Secretary for approval prior to commencing quarrying operations; and (c) include: - a Rehabilitation Management Plan; and - a Long Term Management Strategy. <i>Note: The Department accepts that the initial Landscape Management Plan may not include the detailed Long Term Management Strategy. However, a conceptual strategy must be included in the initial plan, along with a timetable for augmentation of the strategy with each subsequent review of the plan.</i>	- Section 7 – Rehabilitation Management and Section 8 – Long-Term Management Strategy. - The Landscape and Rehabilitation Management Plan has been prepared, submitted, approved and is compliant with consent conditions.	
2.24.	24.	The Rehabilitation Management Plan must include: (a) the rehabilitation objectives for the site; (b) a description of the measures that would be implemented to: - rehabilitate and stabilise the site; - minimise the removal of mature trees; and - manage the remnant vegetation and habitat on the site; (c) detailed performance and completion criteria for the rehabilitation and stabilisation of the site; (d) a detailed description of how the performance of the rehabilitation of the quarry would be monitored over time to achieve the stated objectives; (e) a detailed description of what measures would be implemented to rehabilitate and manage the landscape of the site, including the procedures to be implemented for: - progressively rehabilitating and stabilising areas disturbed by quarrying; - implementing revegetation and regeneration within the disturbance areas;	Specialist input for this condition: Sighted Landscape and Rehabilitation Management Plan (Redisand 2021) (a) Section 7.1 – Rehabilitation Management Objectives (b) Section 7 – Rehabilitation Management (c) Section 7.6 – Performance Completion Criteria (d) Section 7.5 – Rehabilitation Inspections and Rehabilitation Monitoring (e) Section 6 – Biodiversity and Clearing Management; and Section 7 – Rehabilitation Management (f) Section 7.10 – Risk Management and Contingencies (g) g) Section 11 – Roles and Responsibilities. Annual Reviews 2020 – 2023 (Redisand 2021e – 2024). The Landscape and Rehabilitation Management Plan is compliant with consent conditions.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		- protecting areas outside the disturbance areas, including groundwater dependent ecosystems; - vegetation clearing protocols, including a protocol for clearing any trees containing hollows and the relocation of hollows from felled trees; - managing impacts on fauna; - controlling terrestrial and aquatic weeds and pests; - controlling access; - bushfire management; and - reducing the visual impacts of the development; (f) a description of the potential risks to successful rehabilitation, and a description of the contingency measures that would be implemented to mitigate these risks; and (g) details of who is responsible for monitoring, reviewing, and implementing the plan.	Evidence from the Annual Review reports between 2020 and 2023 demonstrate that the Landscape and Rehabilitation Management Plan is being implemented.	
2.25.	25.	<i>The Long Term Management Strategy must:</i> (a) define the objectives and criteria for quarry closure and post-extraction management; (b) investigate and/or describe options for the future use of the site; (c) describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the development; and (d) describe how the performance of these measures would be monitored over time.	Specialist input for this condition: Sighted Landscape and Rehabilitation Management Plan (Redisand 2021) – Section 8 Long Term Management Strategy a) Section 8.1 – Statutory Requirements b) Section 8.4 - Options for Future Use of Site c) Section 8.5 - Management of Ongoing Environmental Effects d) Section 8.6 - Monitoring of Performance Measures. (a) The Long Term Management Strategy presented in the Landscape and Rehabilitation Management Plan is compliant with consent conditions.	C
2.26.	26.	Rehabilitation Bond <i>Prior to commencing quarrying operations, the Applicant must lodge a rehabilitation bond for the development with the Secretary. The sum of the bond must be calculated as either:</i>	Specialist input for this condition: Sighted Revised Rehabilitation Bond (ATB Morton 2018). The timing trigger is not within the temporal scope of this audit, however evidence has been sighted to demonstrate that ATB Morton Pty Ltd	NT

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(a) \$2.50/m² for the area to be disturbed for the first 3 years of quarrying operations; or (b) in accordance with the NSW Industry and Investment Rehabilitation Cost Estimate Guidelines 2010, to the satisfaction of the Secretary. Notes: - If capital and other expenditure required by the Rehabilitation Management Plan is largely complete, the Secretary may waive the requirement for the lodgement of a bond in respect of the remaining expenditure. - If the rehabilitation of the site area is completed to the satisfaction of the Secretary, then the Secretary will release the bond. If the rehabilitation of the site is not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.	guaranteed an amount of \$64,225.00 to DPE on 22 March 2018, and \$106,000.0 on 13 February 2015.	
2.27.	27.	Within 3 months of each Independent Environmental Audit (see condition 8 of schedule 5), the Applicant must review, and if necessary revise, the sum of the rehabilitation bond to the satisfaction of the Secretary. This review must consider: (a) the effects of inflation; (b) the area proposed to be disturbed in the next 3 years and any changes to the total area of disturbance; and (c) the performance of the rehabilitation to date.	Specialist input for this condition: Sighted Rehabilitation bond letter (DPE 2023). The Rehabilitation Bond was reviewed and revised after the completion of the previous Independent Environmental Audit and was submitted to the Department on 23 February 2022 (Redisand 2023). The review considers the value of the bond at the time, the area of disturbance and rehabilitation at the time, and the estimated area of disturbance over the next 3 years, and the proposed bond to cover the estimated net disturbance. Letter dated 18 January 2023 from DPE confirmed acceptance of the rehabilitation bond calculation.	C
ABORIGINAL CULTURAL HERITAGE				
2.28.	28.	Aboriginal Cultural Heritage Management Plan The Applicant must prepare an Aboriginal Cultural Heritage Management Plan to the satisfaction of the Secretary. This plan must:	Sighted Aboriginal Cultural Heritage Management Plan (ACHMP) Version 4 dated September 2021 (a) ACHMP section 2 "Consultation" confirms that the plan has been sent to Mur-roo-ma-Inc., Nur-Run-Gee and Worimi Local Aboriginal Land Council.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(a) be prepared in consultation with all relevant local Aboriginal communities; (b) be submitted to the Secretary for approval prior to commencement of construction activities; and (c) include: - measures for ongoing consultation with local Aboriginal communities and the involvement of these communities in the ongoing management of Aboriginal cultural heritage values of the development site; - a sub-surface archaeological investigation program for the site; - a description of the measures that would be implemented to salvage any identified Aboriginal objects within the disturbance area; - a description of the measures that would be implemented to protect any Aboriginal objects outside the disturbance area; - measures to provide an keeping place for salvaged Aboriginal objects; - an Aboriginal cultural education program for the induction of personnel and contractors involved in construction activities; and - a description of the measures that would be implemented if any new Aboriginal objects or skeletal remains are discovered during the development. The Applicant must implement the plan as approved by the Secretary.	(b) The plan was submitted to the Secretary on 17/07/21. (c) Include; - Refer to ACHMP section 6.7 "Ongoing Consultation with the Aboriginal Community" - Refer to ACHMP section 6.2 "Stage 2a (monitoring tree removal)" and section 6.3 "Stage 2b (monitoring topsoil removal)" - Refer to ACHMP section 10.1 "Major Events / Sites and Actions" - Refer to ACHMP section 6.5 "Projecting Objects Outside the Disturbance Area" - Refer to ACHMP section 6.6 "Keeping Place" and section 7.1 "Keeping Place" - Refer to ACHMP section 8 "Training and Education" - Refer to ACHMP section 10.1 "Major Events / Sites and Actions" Refer to correspondence dated 16/04/19 from Murrooma Inc within Appendix A of the ACHMP regarding no requirement for Murrooma to be present for the clearing of overburden. The plan has been effectively implemented.	
TRAFFIC AND TRANSPORTATION				
2.29.	29.	Road Upgrades Prior to commencing increased trucking approved under Modification 5 and stipulated in condition 7A of Schedule 2, the Applicant must upgrade the intersection of Nelson Bay Road and	Truck movements are currently in accordance with Schedule 2 Condition 7	NT

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		Janet Parade to a Basic Right Turn (BAR) type intersection in consultation with Council and to the satisfaction of TfNSW. <i>Note: Conditions of consent do not guarantee TfNSW's final consent to the specific road work, traffic control facilities and other structures or works, for which it is responsible, on the road network. TfNSW must provide a final consent for each specific change to the classified (State) road network prior to the commencement of any work.</i>		
2.30.	29A.	Prior to commencing increased trucking approved under Modification 4 and stipulated in condition 7B of Schedule 2, the Applicant must upgrade the intersection of Nelson Bay Road and Janet Parade to a channelised right turn (CHR) type intersection in consultation with Council and to the satisfaction of TfNSW. <i>Note: Conditions of consent do not guarantee TfNSW's final consent to the specific road work, traffic control facilities and other structures or works, for which it is responsible, on the road network. TfNSW must provide a final consent for each specific change to the classified (State) road network prior to the commencement of any work.</i>	Truck movements are currently in accordance with Schedule 2 Condition 7	NT
2.31.	30.	Prior to commencement of quarrying operations, the Applicant must: (a) design, construct and seal the access haul road and its intersection with Janet Parade; (b) install and subsequently maintain a shaker grid or equivalent on the quarry access road; and (c) install appropriate truck turning warning signage along Janet Parade, to the satisfaction of Council.	Historical condition	NT
2.32.	31.	On-Site Traffic Management The Applicant must ensure that: (a) all vehicles do not exceed a speed of 40 km/h on the site; (b) all loaded vehicles entering or leaving the site are covered; and	The auditor notes that all traffic on site did not exceed 40km/h and in particular noted that all vehicles operated at walking pace. It is also noted that access track conditions are not suitable for speeds in excess of 40km/h.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(c) all loaded vehicles leaving the site are cleaned of sand and other materials that may fall on the road, before they leave the site.	The auditor witnessed the loading of truck & dog, and the exit from site of the vehicle. The loads were covered and the vehicle in good clean condition. Refer to photo of load out in Appendix F. Refer to photos in Appendix F showing speed signs at the entrance to and within the site, and evidence of rumble grid installation to prevent sand removed from vehicle prior to egress from site.	
2.33.	32.	Parking The Applicant must provide sufficient parking on-site for all development-related traffic in accordance with Council's parking codes.	Sufficient parking is provided on site	C
2.34.	33.	Traffic Management Plan Prior to commencement of quarrying operations, the Applicant must prepare a Traffic Management Plan for the development, to the satisfaction of the Secretary. The plan must: (a) be submitted to the Secretary for approval prior to the commencement of quarrying operations; (b) describe the measures that would be put in place to ensure compliance with the driver's code of conduct; and (c) include a driver's code of conduct for the development to minimise the impacts of trucks on local residents. The Applicant must implement the plan as approved by the Secretary.	Sighted Traffic Management Plan (TMP) dated May 2019. (a) Submission of TMP condition prior to operations commencing. The TMP has not been updated since the last audit. The current revision is dated May 2019. (b) Refer to TMP section 4 "Drivers Code of Conduct" Refer to TMP section 4 "Drivers Code of Conduct"	C
VISUAL				
2.35.	34.	Visual Amenity The Applicant must minimise the visual impacts of the development to the satisfaction of the Secretary.	Visual impacts have been minimised. Only project specific signage is present.	C
2.36.	35.	Advertising	There is no advertising present.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>The Applicant must not erect or display any advertising structure(s) or signs on the site without the written approval of the Secretary.</i> <i>Note: This condition does not require approval for any business identification, traffic management and safety or environmental signs.</i>		
WASTE MANAGEMENT				
2.37.	36.	<i>The Applicant must minimise the amount of waste generated by the development to the satisfaction of the Secretary.</i>	Waste management processes are in place to minimise waste. Waste bins are serviced weekly by local council and scrap metal skip emptied when required, noting that this was last emptied 16/12/2022. Auditor sighted SIMS Metal Invoice TPE199520 (30/01/23). Additionally, workshop area is kept clean, and waste bins utilised. Auditor sighted weekly workshop inspection forms.	C
2.38.	37.	<i>The Applicant must not cause, permit or allow any waste generated outside the site to be received at the site for storage, treatment, processing, reprocessing or disposal or any waste generated at the site to be disposed of at the site, except with the approval of the Secretary and as expressly permitted by a licence under the Protection of the Environment Operations Act 1997.</i> <i>Note: This condition only applies to the storage, treatment, processing, reprocessing or disposal of waste at the site if it requires an EPL under the Protection of the Environment Operations Act 1997.</i>	During the course of the audit interview with the Quarry Manager, it was confirmed that the facility does not accept any waste materials from off site. There was no evidence of waste from offsite being accepted by the facility.	C
EMERGENCY AND HAZARDS MANAGEMENT				
2.39.	38.	Dangerous Goods <i>The Applicant must ensure all chemicals and/or petroleum products on site are stored in accordance with Australian Standard AS1940-2004, The Storage and Handling of Flammable and Combustible Liquids, and in appropriately bunded areas with impervious flooring and of sufficient capacity to contain 110% of</i>	A visual inspection during the site visit confirmed that dangerous goods are stored as per AS1940 within the workshop shed area. This area is a fully enclosed concrete bunded floor. Refer to photos in Appendix F showing hazardous goods storage cabinet and bunded pallets.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		the largest container stored within the bund. The flooring and bund(s) must be designed in accordance with: - the requirements of relevant Australian Standards; and - DECC's Storing and Handling Liquids: Environmental Protection – Participants Manual;		
2.40.	39.	Safety The Applicant must secure the development to ensure public safety to the satisfaction of the Secretary.	The site is signed appropriately with warning signs. PPE requirements, UHF channel information. There is a lockable boom gate for afterhours security.	C
PRODUCTION DATA				
2.41.	40.	The Applicant must: (a) provide annual quarry production data to MEG using the standard form for that purpose; and (b) include a copy of this data in the Annual Review (see condition 3 of Schedule 5).	Production data for the entire audit period was provided. It was confirmed that this data was also included in the Annual Review for each calendar year during the audit period.	C
3.	SCHEDULE 4: ADDITIONAL PROCEDURES			
NOTIFICATION OF LANDOWNERS				
3.1.	1.	By the end of November 2010, the Applicant must notify, in writing, the owner of residence JP2 of his/her entitlement to additional noise mitigation measures.	Historical condition	NT
3.2.	2.	If the results of the monitoring required in schedule 3 identify that the impacts generated by the development on site are greater than the relevant impact assessment criteria, and there is no negotiated agreement in place to allow the impact, then within 2 weeks of obtaining the monitoring results the Applicant must: (b) notify the Secretary, the affected landowners and tenants (including tenants of quarry-owned properties)	There have been criteria exceedances in groundwater and air quality results during the IEA period which have not been notified to residents. For landowners affected by the air quality criteria exceedances, a copy of the NSW Health fact sheet entitled "Mine Dust and You" has not been distributed	NC07

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		accordingly, and provide monitoring results to each of these parties until the results show that the development is complying with the relevant criteria in schedule 3; and (c) in the case of exceedances of the relevant air quality criteria, send the affected landowners and/or tenants a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time).		
INDEPENDENT REVIEW				
3.3.	3.	If a landowner of privately-owned land considers the development to be exceeding the relevant criteria in schedule 3, then he/she may ask the Secretary in writing for an independent review of the impacts of the development on his/her land. If the Secretary is satisfied that an independent review is warranted, then within 2 months of the Secretary's decision the Applicant must: (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 the measures that could be implemented to ensure compliance with the relevant criteria; and (b) give the Secretary and landowner a copy of the independent review.	An Independent Review has not been requested to the Secretary	NT
3.4.	4.	If the independent review determines that the development is complying with the relevant criteria in schedule 3, then the Applicant may discontinue the independent review with the approval of the Secretary.	Not applicable	NT

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>If the independent review determines that the development is not complying with the relevant criteria in schedule 3, then the Applicant must:</i> <i>(a) implement all reasonable and feasible mitigation measures, in consultation with the landowner and appointed independent person, and conduct further monitoring until the development complies with the relevant criteria; or</i> <i>(b) secure a written agreement with the landowner to allow exceedances of the relevant criteria, to the satisfaction of the Secretary.</i>		
4.	SCHEDULE 5: ENVIRONMENTAL MANAGEMENT, AUDITING AND REPORTING			
ENVIRONMENTAL MANAGEMENT				
4.1.	1.	Environmental Management Strategy <i>The Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. The strategy must:</i> <i>(a) be submitted to the Secretary for approval prior to the commencement of construction activities;</i> <i>(b) provide the strategic framework for environmental management of the development;</i> <i>(c) identify the statutory approvals that apply to the development;</i>	Sighted Environmental Management Strategy (EMS) Version 9 dated May 2022. (a) Sighted DPHI letter dated 25 July 2022 confirms that the Department is satisfied with the Environmental Management Strategy. (b) Refer to EMS section 5.1 “Strategic Context of Environmental Management” (c) Refer to EMS section 4 “Statutory Requirements” (d) Refer to EMS section 9 “Roles and Responsibilities” (e) Procedures;	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development; (e) describe the procedures that would be implemented to: - keep the local community and relevant agencies informed about the operation and environmental performance of the development; - receive, handle, respond to, and record complaints; - resolve any disputes that may arise during the course of the development; - respond to any non-compliance; and - respond to emergencies; and (f) include: - copies of the various strategies, plans and programs that are required under the conditions of this consent once they have been approved; and - a clear plan depicting all the monitoring to be carried out in relation to the development. The Applicant must implement the strategy as approved by the Secretary	- Refer to EMS section 5.3.1 “Community and Agency Consultation” - Refer to EMS section 7.1.3.1 “Community Complaints” - Refer to EMS section 7.1.3.2 “Dispute Resolution” - Refer to EMS section 7.1.1 “Non-Compliances and Corrective Actions” - Refer to EMS section 6.4 “Emergency Preparedness and Response Strategy” Refer to Project's website and individual plans.	
4.2.	2.	Management Plan Requirements The Applicant must ensure that the Management Plans required under this approval are prepared in accordance with any relevant guidelines, and include: (a) detailed baseline data; (b) a description of: - the relevant statutory requirements (including any relevant approval, licence or lease conditions); - any relevant limits or performance measures/criteria; 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;	All Management Plans include the required information and have a cross referencing table to ensure that they are compliant with these requirements. However, it may be beneficial for each plan to include a revision history table at the front of the document to assist with checking update history.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(c) a description of the measures that would be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria; (d) a program to monitor and report on the: - impacts and environmental performance of the development; and - effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences; (f) a program to investigate and implement ways to improve the environmental performance of the development over time; (g) a protocol for managing and reporting any: - incidents; - complaints; - non-compliances with statutory requirements; and - exceedances of the impact assessment criteria and/or performance criteria; and (h) a protocol for periodic review of the plan. <i>Note: At the discretion of the Secretary, some of these requirements may be waived where they are either not relevant or necessary.</i>		
4.3.	2A.	Application of Existing Strategies, Plans and Programs <i>The Applicant must continue to apply existing management plans, strategies or monitoring programs approved prior to the approval of Modification 4, until the approval of a similar plan, strategy or program following the approval of Modification 4.</i>	All management plans have been reviewed and updated since the approval of Mod 4	C
4.4.	3.	Annual Review <i>By the end of March each year, the Applicant must review the environmental performance of the development to the satisfaction of the Secretary. This review must:</i>	Annual Reviews of the project have been completed for each year during the audit period and all include: (a) a description of works undertaken for the year and proposed works to be undertaken	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		(a) describe the works (including rehabilitation) that were carried out in the previous calendar year, and the works that are proposed to be carried out over current calendar year; (b) include a comprehensive review of the monitoring results and complaints records of the development over the past year, which includes a comparison of these results against: - the relevant statutory requirements, limits or performance measures/criteria; - the monitoring results of previous years; and - the relevant predictions in the EA; (c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance; (d) identify any trends in the monitoring data over the life of the development; (e) identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the next year to improve the environmental performance of the development.	(b) a review of all monitoring results and complaints (c) highlighted instances where non-compliances have been identified and proposed close-out actions (d) long-term trends identified (e) discrepancies identified where actual impacts and predicted impacts do not align (f) improvement measures to be implemented	
4.5.	4.	Revision of Strategies, Plans & Programs Within 3 months of: (a) the submission of an annual review under condition 3 above; (b) the submission of an incident report under condition 6 below; (c) the submission of an audit report under condition 8 below; and (d) any modifications to this approval,	The Surface Water Management Plan V4 September 2021 was not updated within 3 months of the submission of the previous IEA (January 2021) All Management Plans have a 'change details section' to ensure that document edits are tracked. However, it may be beneficial for each plan to include a revision history table at the front of the document to assist with checking update history.	NC08 OFI01

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>the Applicant shall review, and if necessary revise, the strategies, plans, and programs required under this approval to the satisfaction of the Secretary.</i> <i>Note: This is to ensure the strategies, plans and programs are updated on a regular basis, and incorporate any recommended measures to improve the environmental performance of the development.</i>		
4.6.	5.	<i>The Applicant shall establish and operate a Community Consultative Committee (CCC) for the development in general accordance with the Community Consultative Committee Guidelines: State Significant Projects (2016, or its latest version), and to the satisfaction of the Secretary. This committee must be operating prior to the commencement of any construction activities on site.</i> <i>Note: The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Applicant complies with this approval. In accordance with the Guideline, the Committee should comprise an independent chair and appropriate representation from the Applicant, Council, recognised environmental groups and the general community in the area of the development.</i>	Sighted latest CCC minutes 2nd November 2023 The Chair is recommending disbanding the CCC and minuted that they would write to DPE. Recommend following up with the Chair of the CCC whether this has been progressed any further.	OFI02
REPORTING				
4.7.	6.	Incident Notification <i>The Applicant must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing via the Major Projects Website and identify the development (including the development consent number and name) and set out the location and nature of the incident.</i>	There have been no incidents on site during the audit period	C
4.8.	7.	Non-Compliance Notification	NSW Planning issued the quarry operator Redisand Pty Ltd (Redisand) a warning letter on 23 November 2023, for failing to notify the Secretary of non-compliances.	NC09

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the noncompliance. The notification must be in writing via the Major Projects Website and identify the development (including the development consent number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance. Note: A non-compliance which has been notified as an incident does not need to also be notified as a non-compliance.	Redisand failed to notify DPHI and EPA of arsenic levels above criteria levels in June and September 2023 monitoring reports. Sighted GW monitoring reports 14751 (12/07/2023) and 15109 (5/10/23). Refer to NC05.	
AUDITING				
4.9.	8.	Pre-commencement Compliance Audit Prior to the commencement of quarrying operations on the site, the Applicant must commission an independent person, approved by the Secretary, to certify in writing to the satisfaction of the Secretary that the Applicant has complied with all relevant conditions of approval.	Historical condition	NT
4.10.	9.	Independent Environmental Audit By 31 December 2013, and every 3 years thereafter, unless the Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must: (a) be conducted by suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development and assess whether it is complying with the relevant requirements in this approval and any relevant	This audit is overdue. The IEA should have been undertaken 3 years after the previous audit however was postponed to early 2024. (a) This current Independent Environmental Audit has been conducted by a suitably qualified auditor, approved by the Secretary on 15 March 2024. (b) The following agencies were consulted: i. DPHI ii. EPA iii. DCCEEW iv. Port Stephens Council, and v. Community Consultative Committee Chair	NC10

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>EPL or Mining Lease (including any assessment, plan or program required under these approvals);</i> (d) <i>review the adequacy of strategies, plans or programs required under the abovementioned consents, licences or leases;</i> (e) <i>recommend measures or actions to improve the environmental performance of the development, and/or any assessment, plan or program required under these approvals; and</i> (f) <i>be completed within 2 months of the approval of the audit team.</i> <i>Note: This audit team must be led by a suitably qualified auditor and include experts in any fields specified by the Secretary.</i>	(c) The findings of this audit (d) The findings of this audit (e) The findings and recommendations of this audit (f) This audit was undertaken within 2 months of the audit team being approved by the Secretary.	
4.11.	10.	<i>Within 6 weeks of the completing of this audit, or as otherwise agreed by the Secretary, the Applicant must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.</i>	The previous IEA audit report (January 2021) was submitted to DPHI within the required timeframe.	C
ACCESS TO INFORMATION				
4.12.	11.	<i>From 1 November 2011, the Applicant must:</i> (b) <i>make the following information publicly available on its website:</i> <i>a copy of all approved strategies, plans and programs;</i> <i>a summary of all monitoring results of the development, which have been reported in accordance with the various plans and programs approved under the conditions of this approval;</i> <i>a complaints register, updated on a quarterly basis;</i> <i>copies of the minutes of CCC meetings;</i> <i>copies of any Annual Reviews (over the last 5 years);</i>	A review of the Redisand website confirms that the following are publicly available: - copies of all environmental reports and plans - monitoring results for air, noise, soil & water - the complaints register - copies of all CCC meeting minutes - copies of all Annual Reviews - copies of all IEA's and responses However, a recent review of publicly available information determined that the complaints register and minutes for the Community Consultative Committee were last updated in March 2022, which is non-compliant with part B of this condition.	NC11

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		- copies of any Independent Environmental Audit, and the Applicant's response to the recommendations in any audit; and - any other matter required by the Secretary; and (c) keep this information up-to-date, to the satisfaction of the Secretary.	Recommend updating all publicly available documentation.	
5.	APPENDIX 3: STATEMENT OF COMMITMENTS			
5.1.	1.	ECOLOGY Environmental Offset By 1st February 2015, the required number of biodiversity credits are to be retired. Hollow bearing tree management To compensate the loss of up to 212 hollow bearing trees identified in the extraction foot print it is proposed to salvage branch hollows (up to 30 cm in diameter) from those existing hollow bearing trees proposed for removal for subsequent re-erection onto host trees which the subject site, such as the buffer zones or retained swamp forest habitat, and / or on adjoining Office of Environment and Heritage estate. Hollows will be placed at least 3 metres from the base of the host tree and in a favourable orientation to minimise exposure. Host trees should be in good health. All salvaged hollows shall be re-erected within twelve (12) weeks from completion of staged clearing operations. Damaged hollows would be repaired (where possible) or replaced with nest boxes. Where required, nest boxes are to be placed in host trees in retained habitats such as buffer zones and retained swamp forest habitat and if possible, in adjoining BCD estate.	Specialist input for this condition: Environmental Offset Sighted Landscape and Rehabilitation Management Plan (Redisand 2021a) – Section 4.2 Biobanking agreement ID number 108 (NSW OEH 2016). The timing trigger is not within the temporal scope of this audit, but it is understood that credits have been retired. Hollow bearing tree management Sighted Landscape and Rehabilitation Management Plan (Redisand 2021a) – Section 6.1 and 6.2 There is evidence to demonstrate that hollow bearing trees have been felled in line with the protocol outlined in the Landscape and Rehabilitation Management Plan (including preclearing surveys and ecological supervision during clearing). The 2021 Annual review details that 71 nest boxes and 50 hollows salvaged from felled trees were installed to compensate for the loss of 115 hollow bearing trees. No detail was given on the timing or placement of installation. In 2022, eight habitat trees were marked for removal but there is no evidence that hollows were compensated for through either retention of	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>The re-use of hollows and establishment of nest boxes provides habitat for a range of species including:</i> • <i>Brush – tailed Phascogale;</i> • <i>Squirrel Gliders; and</i> • <i>Microbats.</i> <i>Existing logs and other suitable ground debris salvaged during clearing operations are to be retained in forested habitats within the subject site. The provision ground debris within the site would be expected to provide shelter and nesting habitat for small terrestrial mammals, additional habitat for the Brush – tailed Phascogale and Squirrel Gliders. Cleared trees supporting trunk hollows would provide suitable den sites for quolls.</i> Buffer Zones <i>The following buffer zones / exclusion zones are proposed to be established prior to, and maintained throughout the life of the quarry:</i> • <i>A fifty (50) metre buffer shall be established on both sides of the northern Energy Australia power line. This will create a 130-metre-wide 'exclusion zone (including the 30 metre cleared area);</i> • <i>A fifty (50) metre wide buffer zone is proposed along the site boundary adjoining Office of Environment and Heritage Estate to minimise edge effects;</i> • <i>Remaining site boundaries will be provided with a twenty-metre-wide vegetated buffer; and</i> • <i>A twenty (20) metre wide buffer zone is also proposed between the northern edge of the quarry face and the retained swamp forest habitats on the site.</i> <i>All buffer zones are to be surveyed and marked (flagging tape / plastic mesh fencing) prior to the commencement of clearing works.</i>	hollow features of installation of nest boxes (Redisand 2023). In 2023, 20 habitat trees were felled, but again there is no evidence of the provision of compensatory habitat. The Landscape and Rehabilitation Management Plan states that a total of 212 nest boxes must be installed, providing a ratio of 1:1 for lost hollow bearing trees. It is not clear how many nest boxes are still in a suitable condition to support fauna as the 2023 monitoring was not completed due to staff safety concerns around access. Furthermore, the 2023 Annual Review suggests that the location of installed nest boxes are not beneficial due to their proximity to available salvaged hollows. It is recommended that future Annual Reviews include a summary of nest boxes and salvaged hollows, their location and condition. Auditor note: sighted <i>Nest Box & Hollows Report (Firebird, December 2021)</i> which identified that a total of 51 hollows were removed in the first clearing, with 64 hollows removed in the second clearing, with seventy-one (71) nest boxes and fifty (50) salvaged hollows having been installed within the site to replace these. Site inspection confirmed the erection of hollow bearing trees and the placement of ground-borne hollows for the purpose of fauna furniture within the rehabilitation areas. Refer to Appendix F for photos. Buffer Zones Sighted Landscape and Rehabilitation Management Plan (Redisand 2021a) – Section 6.6. The following non-compliances were recorded in the 2023 Annual Review (Redisand 2024): • There have been historical non-compliances regarding buffer zone boundaries and since 2020, Redisand has been consulting with DPHI to modify their original EA so that they can rectify these issues. This consultation is still ongoing. In the meantime, Redisand continues to maintain the area around the buffer zones and report the progress in the Annual Reviews.	

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>Buffers will generally be consistent with the figure provided in Appendix B</i>	The DPHI RFI (Appendix 1) requests further evidence that the buffer zones have been maintained to the requirements of this condition, including photographs. Discussion should be included in the Annual Reports going forward, including mapping and photographs where appropriate, to demonstrate compliance with the commitment to buffers. Auditor note: The site inspection confirmed that buffer zones are being maintained as per the requirements of this condition. Refer to photos in Appendix F.	

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
5.2.	2.	VEGETATION MANAGEMENT – SALT ASH <i>A comprehensive Vegetation Management Plan will be prepared to address the staged clearing program within the extraction footprint. This plan is to be endorsed by NSW Department of Planning and Environment prior to the commencement of clearing or earthworks. The plan shall have regard to the following matters, as outlined in the Orogen 2008 report:</i> Vegetation Clearing Management • <i>All contractors conducting clearing, earthworks or construction activities within the subject site are to be informed of the restrictions to the clearing of vegetation outside the exclusion fencing. A construction protocol would be prepared requiring all earthworks, machinery and personnel be strictly controlled and restricted to the extraction footprint. No storage of materials, vehicle parking or other disturbance would be undertaken outside the exclusion fencing. Contractors would be supplied with the construction protocol regarding the clearing restrictions through a work induction program;</i> • <i>Trees are to be felled away from the retained bushland on the subject site back into the extraction area; and</i> • <i>Domestic fauna (i.e. dogs) are prohibited from entering the subject site with Contractors.</i> Weed Management <i>A Weed Management Program is to be adopted to control weeds in buffer zones, retained swamp forest habitats and future extraction stages to minimise edge effects and future extraction stages. The program is to comprise annual monitoring to assess weed coverage and determine the need for future weed control.</i> Pre Clearing Surveys	Specialist input to this condition: Sighted Landscape and Rehabilitation Management Plan (Redisand 2021), Annual Reviews 2020 – 2023 (Redisand 2021e – 2024). The Landscape and Rehabilitation Management Plan is compliant with the Statement of Commitment for the purposes of vegetation management and has been endorsed by the Secretary. Evidence from the Annual Review reports between 2020 and 2023 demonstrate this statement of commitment is generally being met, with evidence of pre-clearing surveys and ecological supervision during vegetation clearing, as well as the implementation of staged rehabilitation. No information is given on the weed management actions undertaken during the reporting period, the current extent of weed coverage across the site, nor the need for future weed control measures. It is recommended that future Annual Reviews also include reporting on the weed control actions outlined in the Statement of Commitment. Weed management is conducted internally. No evidence of weeds during the site inspection. Auditor sighted weed spraying records from July 2021, November 2022, and March 2023.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		<i>Fauna surveys are required prior to vegetation clearing for each staged extraction area. Surveys shall target Threatened species known or potentially occurring in the locality and will involve the following steps four nights prior to staged clearing activities: -</i> • <i>Searches for nests of threatened raptors;</i> • <i>Searches for whitewash or other signs of roosting or nesting of Powerful and Masked Owls;</i> • <i>Stag watching and Anabat survey of hollow bearing trees in each staged extraction area to determine presence of Microchiropteran bats;</i> • <i>Scat searches and visual inspection for recent Koala occupation of all trees proposed for felling; and</i> • <i>Elliot trapping surveys for Squirrel Gliders and Brush – Tailed Phascogale.</i> <i>Any identified species must be appropriately monitored, and clearance obtained prior to commencement of clearing in identified habitat / nesting sites. The results of such surveys would be made available to Office of Environment and Heritage prior to the commencement of clearing operations for each stage.</i> Translocation of Threatened Fauna <i>Where it is proposed to translocate a threatened fauna species, this process shall be undertaken in accordance with Policy of the Translocation of Threatened Fauna in NSW (NPWS, 2001).</i> Staged Rehabilitation <i>Prior to the commencement of works a site rehabilitation plan is to be endorsed by NSW Department of Planning and Environment. This plan should have regard for:</i> • <i>Staging of rehabilitation;</i> • <i>Retention and reuse of materials from clearing process;</i> • <i>Seedbanking; Use of endemic species;</i>		

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		- Recovery of any groundwater dependent ecosystems, including swamp sclerophyll forest; - Proposed final landforms; and - Ongoing monitoring.		
5.3.	3.	VEGETATION MANAGEMENT – Offset Site A vegetation management plan shall be prepared for the Offset Site. This Plan shall be endorsed by Office of Environment and Heritage prior to the commencement of clearing on the Salt Ash site. The plan shall give regard to the following: - Weed Management and monitoring; - Management of retained native vegetation and habitat; - Feral animal control; - Fire management; - Public access management; - Minimisation of edge effects and fragmentation; - Long term monitoring commitments; - Details of rehabilitation programs / measures; - Measures to ensure conservation in perpetuity; and - Funding details of long term financial commitment to any proposed conservation measures.	Specialist input for this condition: There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla. The DPHI RFI (Appendix 1) requests evidence to support a statement by IEMA that monitoring has been undertaken at the offset site. Monitoring reports for the offset site (Biobanking site 108) are provided as an Appendices of the 2021, 2022 and 2023 Annual Reviews, and include evidence of vegetation and vertebrate pest monitoring. These monitoring reports outline the methods used to undertake monitoring, however these do not address all the points listed under Statement of Commitment 3. A vegetation management plan for the site should be prepared and implemented.	NC12
5.4.	4.	ABORIGINAL CULTURAL HERITAGE An Aboriginal Cultural Heritage Management Plan should be developed in consultation with the local Aboriginal community. This document will guide the management of Aboriginal cultural heritage resources and heritage values for the duration of the Salt Ash Sand extraction development. A detailed Research Design and Methodology should be developed for the Salt Ash sand extraction development. This document will outline procedures for undertaking	An Aboriginal Cultural Heritage Management Plan has been developed in consultation with the local Aboriginal community. Consultation with the Aboriginal community continues. Auditor sighted Cultural Heritage reports from Murrooma Incorporated for inspections undertaken on 16 August 2022, 23 May 2023, and 20 December 2023.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		monitoring, surface collection and archaeological excavation within the development area. - Archaeological excavation should be undertaken as recommended in the AHMS (2008) report. This excavation should be done with the full consultation and involvement of the Aboriginal community. The excavation should only be conducted once development consent has been granted in order to ensure that archaeological sites are not destroyed without reason. - Consultation established with the Aboriginal community should continue for the duration of the development until all matters pertaining to Aboriginal heritage have been resolved. - The AHMS should incorporate a designated keeping place within the site. The size and location of the keeping place should be endorsed by the Aboriginal community.		
5.5.	5.	AIR QUALITY - Any unsealed haulage routes are to be watered to suppress dust prior to the commencement of haulage. - Monitoring of air quality is to occur in accordance with the licensing requirement imposed on the development.	Witnessed dust suppression of the haul roads during the site inspection DDG and hi-volume air monitoring in place	C
5.6.	6.	WATER MANAGEMENT - No excavation is permitted into the sandbed lower than 1 metre above the highest predicted groundwater table for the extraction area. - All operations relating to the extraction of groundwater, including the sinking of bores must be done in compliance with the Water Sharing Plan for the Tomago Tomaree Stockton Groundwater Sources, 2003. - A Groundwater Management Plan is to be developed prior to the commencement of extraction operations to the satisfaction of the Department of Planning. The	Refer to Schedule 2, Condition 6 of the Conditions of Consent Historical condition Historical condition	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		management plan is to include ongoing monitoring requirements. - A Groundwater Impact Model shall be developed to the satisfaction of NSW Department of Planning and Environment which presents details on drawdown limits to neighbouring bores, including those on Lot 220, DP 1049608. The model shall also establish cut off criteria to avoid exposure of Potential Acid Sulphate Soil materials and determine cease to pump limits in accordance with Section 36 of the Water Sharing Plan for the Tomago Tomaree Stockton Groundwater Sources, 2003. - A groundwater monitoring network shall be developed to the satisfaction of NSW Department of Planning and Environment which shall monitor the effectiveness of cut off criteria and compliance with the 1 metre minimum buffer to highest predicted groundwater table as determined within the model and demonstrate minimal interference with neighbouring bores and wells. - Any refuelling of equipment used for the proposal will be undertaken within a designated area, in close proximity to a spill kit and the workshop. Where practical repairs to mobile plant will be undertaken within the workshop. - Prior to the commencement of sand washing on site a license for groundwater extraction is to be obtained or details of alternative arrangements are to be submitted to NSW Department of Planning and Environment. - An approval to install and operate an onsite effluent disposal system shall be obtained in accordance with Section 68 of the Local Government Act, 1993 prior to the commencement of operations.	Historical condition	
5.7.	7.	VISUAL IMPACT For the life of the development an 8-metre ridge line (RL 8m AHD) along the northern boundary of the vegetated sand dune is to be maintained.	An 8m vegetated buffer was sighted during site inspection. The site is not visible from the road or by neighbours.	C

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		• Buffers, as required for ecological mitigation measures, are to be similarly maintained to mitigate visual impacts associated with the development. • Vegetation screens are to be established and maintained to shield the plant amenities building. • Ongoing and progressive revegetation during the sand extraction operation is required. Revegetation is to commence on the completion of extraction from any area. • Sand extraction to occur in accordance with the approved extraction staging plan. • Full revegetation post staged extraction and upon finalisation of the mine.	A Landscape Management Plan is in place on site, noting that the mining sequence will be updated in the new revision of the LMP which is currently under review. Sighted current version of the LMPO (V5 July 2022). Progressive rehabilitation is underway. Refer to Appendix F for photos showing staged rehabilitation.	
5.8.	8.	NOISE & VIBRATION The proposed hours of operation are: • Monday – Friday: - 6:00am – 6:00pm; • Saturday: - 8:00am – 1:00pm; and • Sundays and Public Holidays: - No operations Prior to the commencement of construction or operations a noise management plan shall be prepared and endorsed by NSW Department of Planning and Environment and shall incorporate measures generally consistent with the following recommendations: • Construction of the required noise attenuation barrier adjacent to the Janet Parade residence shall be constructed prior to major earthworks for the quarry access road construction; • Examine different types of machinery that perform the same function and compare the noise level data to select the least noisy machinery. • Place as much distance as possible between the plant or equipment and residences. • Regularly train and communicate with workers and / or contractors regarding the use of equipment in ways to	Historical condition	NT

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		minimise noise. This could include, but is not be limited to, the following: ○ Avoid the use of radios/stereos outside; ○ Avoid shouting and slamming doors; and ○ Keep truck drivers informed of designated routes and parking areas. ○ Periodically check the site and neighbouring residences for noise problems so that solutions can be quickly applied. ● Consult with affected neighbours about scheduling activities to minimise noise impacts. ● Schedule noise activities around times of high background noise (e.g. local road traffic) where possible to provide masking or to reduce the amount that the construction noise intrudes above the background. ● Nominate an off-site truck parking area, away from residences, for trucks arriving prior to gates opening. ● Examine and implement, where feasible and reasonable, the option of acoustical treatment to residences affected by construction noise, such as to windows at the building façade. However, alternative means of ventilation may be required where windows are close and airflow into a building does not meet building requirements. Note also that the effectiveness of closing existing windows may be limited by the performance of the window seals and/or building façade construction. The application for the upgrade to the Nelson Bay Road / Janet Parade Intersection shall incorporate a Construction Noise Impact Assessment and Management Plan. This plan shall be prepared in accordance with the NSW Interim Construction Noise Guidelines and endorsed by NSW Department of Planning and Environment and the RMS prior to the commencement of works associated with the intersection.		
5.9.	9.	Management Plans Required	There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla.	NC13

ID No.	SSD Part & Req. No.	SSD Requirement	Audit Findings	Compliance rating
		The following management plans shall be prepared and endorsed by the relevant authority prior to the commencement of works / operations: • Vegetation Management Plan (Extraction Site); • Vegetation Management Plan (Offset Site); • Aboriginal Cultural Heritage Management Plan; • Groundwater Management Plan and Impact Model; • Construction and Operational Noise Management Plan Continued monitoring of mosquitos within the site in addition to the identification and reduction of aquatic breeding sites will be undertaken. Measures will include not allowing irrigation water to lie undisturbed and checking irrigation lines for leaks.		
6.	10.	Essential Operational Licenses required • The operator is to obtain an Environmental Protection License for the proposal in accordance with the Protection of the Environment Operations Act, 1997; • The operator shall adhere to any ongoing monitoring requirements specified in the license; • Prior to the commencement of any operations the operator will make available and publicise a contact phone number which will enable the general public to reach an appropriate person to address and action any concerns raised. The operator shall maintain a log of all enquiries received and actions undertaken to address the enquiry. A copy of the log shall be supplied to Office of Environment and Heritage on an annual basis.	EPL 13406 is in place for the project	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating						
1.	ADMINISTRATIVE CONDITIONS									
A1	A1.1	What the licence authorises and regulates <i>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.</i> <i>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.</i> <table><tr><th>Scheduled Activity</th><th>Fee Based Activity</th><th>Scale</th></tr><tr><td>Extractive activities</td><td>Land-based extractive activity</td><td>> 100000 - 500000 T annual capacity to extract, process or store</td></tr></table>	Scheduled Activity	Fee Based Activity	Scale	Extractive activities	Land-based extractive activity	> 100000 - 500000 T annual capacity to extract, process or store	Note	NT
Scheduled Activity	Fee Based Activity	Scale								
Extractive activities	Land-based extractive activity	> 100000 - 500000 T annual capacity to extract, process or store								
A2	A2.1	Premises or plant to which this licence applies <i>The licence applies to the following premises:</i> <table><tr><th>Premises Details</th></tr><tr><td>REDISAND PTY LTD</td></tr><tr><td>JANET PARADE</td></tr><tr><td>SALT ASH</td></tr><tr><td>NSW 2318</td></tr><tr><td>AS SHOWN HATCHED BLUE ON FIGURE 2 "NOISE RECEIVER PRIMARYS" DATED 6 JUNE 2016, WHICH HAS BEEN FILED AS PART OF EPA DOCUMENT DOC16/421362.</td></tr></table>	Premises Details	REDISAND PTY LTD	JANET PARADE	SALT ASH	NSW 2318	AS SHOWN HATCHED BLUE ON FIGURE 2 "NOISE RECEIVER PRIMARYS" DATED 6 JUNE 2016, WHICH HAS BEEN FILED AS PART OF EPA DOCUMENT DOC16/421362.	Note	NT
Premises Details										
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ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating		
A3	A3.1	Other activities <i>This licence applies to all other activities carried on at the premises, including:</i> <table><tr><td>Ancillary Activity</td></tr><tr><td>Extractive activities</td></tr></table>	Ancillary Activity	Extractive activities	Note	NT
Ancillary Activity						
Extractive activities						
A4	A4.1	Information supplied to the EPA <i>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.</i> <i>In this condition the reference to "the licence application" includes a reference to:</i> a) <i>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</i> b) <i>the licence information form provided by the licensee to the EPA to assist the EPA in connection with the issuing of this licence.</i>	Note	NT		
2. DISCHARGES TO AIR AND WATER AND APPLICATIONS TO LAND						
P1	P1.1	Location of monitoring/discharge points and areas <i>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.</i>	Note	NT		

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating																				
		<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>1</td><td>Ambient Air Quality Monitoring</td><td></td><td>Point "D1" as detailed in 'Figure 3' of SLR Diagram titled "Salt Ash Quarry - Dust Monitors", dated 16 May 2016. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr><tr><td>2</td><td>Ambient Air Quality Monitoring</td><td></td><td>Point "D2" as detailed in 'Figure 3' of SLR Diagram titled "Salt Ash Quarry - Dust Monitors", dated 16 May 2016. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr><tr><td>3</td><td>Ambient Air Quality Monitoring</td><td></td><td>Point "D3" as detailed in 'Figure 3' of SLR Diagram titled "Salt Ash Quarry - Dust Monitors", dated 16 May 2016. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr></table>	Air				EPA identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	1	Ambient Air Quality Monitoring		Point "D1" as detailed in 'Figure 3' of SLR Diagram titled "Salt Ash Quarry - Dust Monitors", dated 16 May 2016. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.	2	Ambient Air Quality Monitoring		Point "D2" as detailed in 'Figure 3' of SLR Diagram titled "Salt Ash Quarry - Dust Monitors", dated 16 May 2016. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.	3	Ambient Air Quality Monitoring		Point "D3" as detailed in 'Figure 3' of SLR Diagram titled "Salt Ash Quarry - Dust Monitors", dated 16 May 2016. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.		
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P1	P1.2	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.	Monitoring does not include groundwater levels, but rather depth to water.	NC14																				

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating																								
		<table><thead><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></thead><tbody><tr><td>4</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring location (west of quarrying) labelled as "SB1/MW1" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr><tr><td>5</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring location (south of quarrying) labelled as "BH6" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr><tr><td>6</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring location (south-east of quarrying) labelled as "BH1" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr><tr><td>7</td><td>Groundwater quality monitoring</td><td></td><td>Groundwater monitoring location (east of quarrying) labelled as "BH4" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.</td></tr></tbody></table> <i>Note: The groundwater monitoring locations identified as Points 4, 5, 6 and 7 in Condition P1.3 were determined based on the project extraction stages 1 and 2, as detailed in the report prepared by ATB Morton Pty Ltd titled 'Environmental Assessment: Proposed Sand Quarry - February 2010'. Within twelve (12) months of the commencement of extraction stage 3 works the licensee must notify the EPA in writing and a review of monitoring point locations must be undertaken. A copy of the Environmental Assessment report referenced is filed on EPA file LIC08/1232-02.</i>	Water and land				EPA Identification no.	Type of Monitoring Point	Type of Discharge Point	Location Description	4	Groundwater quality monitoring		Groundwater monitoring location (west of quarrying) labelled as "SB1/MW1" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.	5	Groundwater quality monitoring		Groundwater monitoring location (south of quarrying) labelled as "BH6" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.	6	Groundwater quality monitoring		Groundwater monitoring location (south-east of quarrying) labelled as "BH1" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.	7	Groundwater quality monitoring		Groundwater monitoring location (east of quarrying) labelled as "BH4" on Drawing titled "Approximate Monitoring Well Locations", Coffey Environments dated 5 June 2013. A copy of this Diagram is filed on EPA file EF13/4045 Doc16/421362.		
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ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating															
3.	LIMIT CONDITIONS																		
L1	L1.1	Pollution of waters <i>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.</i>	No water discharges from site. All water reused for dust suppression or recycled through the wash plant and stored in two basins.	C															
L2	L2.1	Waste <i>The licensee must not cause, permit or allow any waste to be received at the premises, except the wastes expressly referred to in the column titled “Waste” and meeting the definition, if any, in the column titled “Description” in the table below.</i> <i>Any waste received at the premises must only be used for the activities referred to in relation to that waste in the column titled “Activity” in the table below.</i> <i>Any waste received at the premises is subject to those limits or conditions, if any, referred to in relation to that waste contained in the column titled “Other Limits” in the table below.</i> <i>This condition does not limit any other conditions in this licence.</i> <table><tr><th>Code</th><th>Waste</th><th>Description</th><th>Activity</th><th>Other Limits</th></tr><tr><td>NA</td><td>Waste</td><td>Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time</td><td>-</td><td>NA</td></tr><tr><td>NA</td><td>General or Specific exempted waste</td><td>Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005</td><td>As specified in each particular resource recovery exemption</td><td>NA</td></tr></table>	Code	Waste	Description	Activity	Other Limits	NA	Waste	Any waste received on site that is below licensing thresholds in Schedule 1 of the POEO Act, as in force from time to time	-	NA	NA	General or Specific exempted waste	Waste that meets all the conditions of a resource recovery exemption under Clause 51A of the Protection of the Environment Operations (Waste) Regulation 2005	As specified in each particular resource recovery exemption	NA	It was evident during the site inspection that the operation was not allowing waste to be received on site, and only waste being generated on site was being managed by the operation.	C
Code	Waste	Description	Activity	Other Limits															
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ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating														
L3	L3.1	Noise limits Operational noise generated at the premises must not exceed the noise limits in the table below at any time. The locations referred to in the table below are indicated by 'Appendix 2: Noise Receiver Locations' in the project approval report Development Consent MP07_0094, dated 29 October 2010. A copy of this plan is filed on EPA file LIC08/1232-02. <table><tr><th>Receiver</th><th>LAeq (15 minute) dB(A)</th></tr><tr><td>JP1</td><td>40</td></tr><tr><td>JP2</td><td>Limit to be regulated by the consent authority under Development Consent MP07_0094, dated 29 October 2010</td></tr><tr><td>JP3</td><td>39</td></tr><tr><td>JP4</td><td>37</td></tr><tr><td>NB1</td><td>36</td></tr><tr><td>All other receivers</td><td>35</td></tr></table> Note: Development Consent MP07_0094 required additional noise mitigation measures and land acquisition where certain noise criteria cannot be met.	Receiver	LAeq (15 minute) dB(A)	JP1	40	JP2	Limit to be regulated by the consent authority under Development Consent MP07_0094, dated 29 October 2010	JP3	39	JP4	37	NB1	36	All other receivers	35	Location NB1 was not monitored during calendar year 2020, and therefore Noise Impact Criteria cannot be verified. This has since been addressed, therefore no recommendations.	NC15
Receiver	LAeq (15 minute) dB(A)																	
JP1	40																	
JP2	Limit to be regulated by the consent authority under Development Consent MP07_0094, dated 29 October 2010																	
JP3	39																	
JP4	37																	
NB1	36																	
All other receivers	35																	
L3	L3.2.	The noise limits set out in the Noise limits table above apply under all meteorological conditions except for the following: a) Wind speeds greater than 3 metres/second at 10 metres above ground level; or b) Stability category F temperature inversion conditions and wind speeds greater than 2 metres/second at 10 metres above ground level; or c) Stability category G temperature inversion conditions. Note: For the purposes of the condition above: a) Data recorded by the meteorological station identified as Bureau of Meteorology -Williamtown Weather Station must be used to determine	Note	NT														

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
		meteorological conditions; and b) Temperature inversion, conditions (stability category) are to be determined by the sigma-theta method referred to in Part E2 of Appendix E to the NSW Industrial Noise Policy.		
L3	L3.3	To determine compliance: a) with the Leq(15 minute) noise limits shown in the Noise Limits table, the noise measurement equipment must be located: - approximately on the property boundary, where any dwelling is situated 30 metres or less from the property boundary closest to the premises; or - within 30 metres of a dwelling façade, but not closer than 3m, where any dwelling on the property is situated more than 30 metres from the property boundary closest to the premises; or where applicable - within approximately 50 metres of the boundary of a National Park or a Nature Reserve. b) with the noise limits shown in the Noise Limits table, the noise measurement equipment must be located: - at the most affected point at a location where there is no dwelling at the location; or - at the most affected point within an area at a location prescribed by part (a) of this condition. Note: A non-compliance of the Noise Limits table will still occur where noise generated from the premises in excess of the appropriate limit is measured: i) at a location other than an area prescribed in part (a) and part (b); and/or	Sighted Operational Noise Reports for 2020 – 2023 undertaken by Spectrum Acoustics. Noise monitoring locations used are as described in this condition.	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
		ii) at a point other than the most affected point at a location.		
L3	L3.4	For the purposes of determining the noise generated at the premises the modification factors in Section 4 of the NSW Industrial Noise Policy must be applied, as appropriate, to the noise levels measured by the noise monitoring equipment.	Note	NT
L4	L4.1	Hours of operation Operation hours, including on-site truck movements, are: a) restricted to between the hours of 7:00am and 5:00pm Monday to Friday; b) restricted to between the hours of 8:00am and 1:00pm Saturday; and c) not to be undertaken on Sundays or Public Holidays. Note: Maintenance activities may occur at any time provided such activities are inaudible at privately owned residential receiver locations	Copies of weigh bridge/truck movements provided. All truck movements are in line with the prescribed operating hours. Note that the operating hours in the EPL do not match those of the conditions of consent.	C
4. OPERATING CONDITIONS				
O1	O1.1	Activities must be carried out in a competent manner 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.	a) Processing, handling, movement and storage of materials and substances is undertaken in accordance with EMS and associated management plans to carry out tasks competently. b) Minimal waste is generated on site. Generally effective waste management.	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
O2	O2.1	Maintenance of plant and equipment <i>All plant and equipment installed at the premises or used in connection with the licensed activity:</i> a) <i>must be maintained in a proper and efficient condition; and</i> b) <i>must be operated in a proper and efficient manner.</i>	Maintenance records for 2012 John Deere 824K Loader, 2014 John Deere 824K, 2023 Rokbak RA30 Dump Truck, and 2022 John Deere Excavator E210-II provided. Note that new dump truck will receive 500hr service Thursday 02/05/24. Evidence of weigh bridge calibrations undertaken during the audit period were provided. All calibration tests conducted 15 June 2021, 22 July 2022, 31 May 2023 & 15 August 2023 passed. All plant and machinery is regularly maintained.	C
O3	O3.1	Dust <i>All areas in or on the premises must be maintained in a condition that prevents or minimises the emission of dust to the air.</i>	Dust on site is managed with regular application of water onto haul roads and working stockpiles	C
O3	O3.2	<i>Any activity carried out in or on the premises must be carried out by such practical means as to prevent dust or minimise the emission of dust to the air.</i>	Dust on site is managed with regular application of water onto haul roads and working stockpiles, and plant and machinery regularly maintained.	C
O3	O3.3	<i>Any plant operated in or on the premises must be operated by such practical means to prevent or minimise dust or other air pollutants.</i>	Dust on site is managed with regular application of water onto haul roads and working stockpiles, and plant and machinery regularly maintained.	C
O3	O3.4	<i>All trafficable areas and vehicle manoeuvring areas in or on the premises must be maintained, at all times, in a condition that will minimise the emission of dust to the air, or emission from the premises of wind-blown or traffic generated dust.</i>	Dust on site is managed with regular application of water onto haul roads and working stockpiles	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
O3	O3.5	<i>Trucks entering and leaving the premises that are carrying loads of dust generating materials must have their loads covered at all times, except during loading and unloading.</i>	Auditor witnessed the loading of truck & dog, and the exit from site of the vehicle. The loads were covered and the vehicle in good clean condition.	C
O4	O4.1	Emergency response <i>The licensee must maintain, and implement as necessary, a current Pollution Incident Response Management Plan (PIRMP) for the premises. The licensee must keep the incident response plan on the premises at all times. The incident response plan must document systems and procedures to deal with all types of incidents (e.g. spills, explosions or fire) that may occur at the premises or that may be associated with activities that occur at the premises and which are likely to cause harm to the environment.</i> <i>The PIRMP must be tested at least annually or following a pollution incident.</i> <i>The licensee must develop the Pollution Incident Response Management Plan in accordance with the requirements in Part 5.7A of the Protection of the Environment Operations (POEO) Act 1997 and POEO regulations.</i>	THE PRIMP is available on site and is available on the website Rev 3 2024	C
O5	O5.1	Processes and management <i>Any refuelling of equipment used on the premises must be undertaken by a registered contractor to remove the need for onsite fuel storage. No maintenance of equipment or storage of chemicals must be allowed to occur on site.</i>	Plant is regularly serviced by fuel provider. Minor quantities of fuel stored on site.	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
O5	O5.2	<i>Any dedicated refuelling area must be hardstand and suitably bunded in accordance with EPA bunding guidance.</i>	A designated refuelling area is available	C
O5	O5.3	<i>Rehabilitation works must be carried out as soon as practicable to minimise wind-blown dust generated from the premises.</i>	Rehabilitation efforts are evident as previously quarried areas see signs of re-growth.	C
O5	O5.4	<i>Noise mitigation measures, such as noise barrier shielding residences on Janet Parade and earth bunds around the fixed plant, must be constructed as soon as practicable and maintained.</i>	Noise fence installed and is greater than 3 metres high. This was sighted at the site entrance during site inspection.	C
O6	O6.1	Other operating conditions <i>Protection of Water and Groundwater Quality</i> <i>To prevent the oxidation of naturally occurring sulphides, sand extraction must be limited to 1 metre above the highest expected groundwater level. That is, extraction must not occur lower than RL 4m AHD.</i>	Markers throughout site indicated the RL 6m mark. No extraction of material below these markers occurs in order to avoid extraction below RL 4m.	C
O6	O6.2	<i>All water management basins must be lined with an impermeable layer to prevent hydraulic connection to the underlying groundwater table.</i>	Both water storage basins are lined with black plastic	C
O6	O6.3	<i>Soil and water management controls must be employed to minimise soil erosion and the discharge of sediments and other pollutants to land and/or waters in accordance with the requirements outlined in Managing Urban Stormwater: Soils and Construction - Volume 2E: Mines and Quarries (DECC, 2208).</i>	The main soil and water management controls on site is the use of two basins used for water storage.	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
5.	MONITORING AND RECORDING CONDITIONS			
M1	M1.1	Monitoring records <i>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.</i>	Note	NT
M1	M1.2	<i>All records required to be kept by this licence must be:</i> a) <i>in a legible form, or in a form that can readily be reduced to a legible form;</i> b) <i>kept for at least 4 years after the monitoring or event to which they relate took place; and</i> c) <i>produced in a legible form to any authorised officer of the EPA who asks to see them.</i>	All records are stored in a shared location and if required, area available on site. Evidence provided during the audit was in a legible format.	C
M1	M1.3	<i>The following records must be kept in respect of any samples required to be collected for the purposes of this licence:</i> a) <i>the date(s) on which the sample was taken;</i> b) <i>the time(s) at which the sample was collected;</i> c) <i>the point at which the sample was taken; and</i> d) <i>the name of the person who collected the sample.</i>	Monitoring data includes QA/QC documentation	C
M2	M2.1	Requirement to monitor concentration of pollutants discharged <i>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:</i>	Note	NT

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating																																
M2	M2.2	Air Monitoring Requirements POINT 1 <table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Particulates - Deposited Matter</td><td>grams per square metre per month</td><td>Monthly</td><td>AM-19</td></tr><tr><td>PM10</td><td>micrograms per cubic metre</td><td>Every 6 days</td><td>AM-18</td></tr><tr><td>Total suspended particles</td><td>milligrams per cubic metre</td><td>Every 6 days</td><td>AM-15</td></tr></tbody></table> POINT 2,3 <table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Particulates - Deposited Matter</td><td>grams per square metre per month</td><td>Monthly</td><td>AM-19</td></tr></tbody></table>	Pollutant	Units of measure	Frequency	Sampling Method	Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19	PM10	micrograms per cubic metre	Every 6 days	AM-18	Total suspended particles	milligrams per cubic metre	Every 6 days	AM-15	Pollutant	Units of measure	Frequency	Sampling Method	Particulates - Deposited Matter	grams per square metre per month	Monthly	AM-19	Missed monitoring on 13 February and 16 November 2022. Dust deposition gauges sighted by the auditor. All DDG's installed as per AS3580.10	NC16								
Pollutant	Units of measure	Frequency	Sampling Method																																	
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M2	M2.3	Water and/or Land Monitoring Requirements POINT 4,5,6,7 <table><thead><tr><th>Pollutant</th><th>Units of measure</th><th>Frequency</th><th>Sampling Method</th></tr></thead><tbody><tr><td>Arsenic</td><td>micrograms per litre</td><td>Every 6 months</td><td>Grab sample</td></tr><tr><td>Conductivity</td><td>millisiemens per centimetre</td><td>Every 6 months</td><td>Grab sample</td></tr><tr><td>Depth</td><td>metres</td><td>Every 6 months</td><td>Probe</td></tr><tr><td>Iron</td><td>milligrams per litre</td><td>Every 6 months</td><td>Grab sample</td></tr><tr><td>Manganese</td><td>milligrams per litre</td><td>Every 6 months</td><td>Grab sample</td></tr><tr><td>pH</td><td>pH</td><td>Every 6 months</td><td>Grab sample</td></tr><tr><td>Turbidity</td><td>nephelometric turbidity units</td><td>Every 6 months</td><td>Grab sample</td></tr></tbody></table>	Pollutant	Units of measure	Frequency	Sampling Method	Arsenic	micrograms per litre	Every 6 months	Grab sample	Conductivity	millisiemens per centimetre	Every 6 months	Grab sample	Depth	metres	Every 6 months	Probe	Iron	milligrams per litre	Every 6 months	Grab sample	Manganese	milligrams per litre	Every 6 months	Grab sample	pH	pH	Every 6 months	Grab sample	Turbidity	nephelometric turbidity units	Every 6 months	Grab sample	Groundwater analyses these parameters. GW reports sighted.	C
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M3	M3.1	Testing methods – Concentration Limits 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	The quarry monitors TSP, PM _{2.5} and PM ₁₀ dust	C																																

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
		c) <i>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>		
M3	M3.2	<i>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.</i> <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>	Water quality monitoring occurs in accordance with Soil and Water MP	C
M4	M4.1	Recording of pollution complaints <i>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.</i>	No complaints received	C
M4	M4.2	<i>The record must include details of the following:</i> <i>a) the date and time of the complaint;</i> <i>b) the method by which the complaint was made;</i> <i>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;</i> <i>d) the nature of the complaint;</i> <i>e) the action taken by the licensee in relation to the complaint, including any follow-up contact with the complainant; and</i> <i>f) if no action was taken by the licensee, the reasons why no action was taken.</i>	No complaints received	NT

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
M4	M4.3	<i>The record of a complaint must be kept for at least 4 years after the complaint was made.</i>	No complaints received	NT
M4	M4.4	<i>The record must be produced to any authorised officer of the EPA who asks to see them.</i>	No complaints received	NT
M5	M5.1	Telephone complaints line <i>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.</i>	Telephone contact details are provided on signage at the front entrance, and are also available on the company website	C
M5	M5.2	<i>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.</i>	Telephone contact details are provided on signage at the front entrance, and are also available on the company website	C
M5	M5.3	<i>The preceding two conditions do not apply until 3 months after: the date of the issue of this licence.</i>	Noted	C
M6	M6.1	Noise monitoring <i>The licensee must undertake noise monitoring on a quarterly basis at noise monitoring locations JP1, JP2, JP3, JP4 and NB5. Monitoring must occur at a period of normal or peak operations and in the case of monitoring at locations JP3 and JP4 must include at least three (3) truck pass-bys.</i>	Noise monitoring undertaken at these locations	C
M6	M6.2	<i>Noise monitoring must be carried out in accordance with Australian Standard AS 2659.1 - 1998: Guide to the use of sound measuring equipment - Portable sound level meters, and the compliance monitoring guidance provided in the NSW Industrial Noise Policy</i>	Despite historical non-conformances, the noise monitoring is now in accordance with AS2659.1 – 1998.	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
6	REPORTING CONDITIONS			
R1	R1.1	Annual return documents <i>The licensee must complete and supply to the EPA an Annual Return in the approved form comprising:</i> 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. <i>At the end of each reporting period, the EPA will provide to the licensee a copy of the form that must be completed and returned to the EPA.</i>	Evidence provided for the submission of EPL Annual Returns for 2020, 2021 & 2023.	C
R1	R1.2	<i>An Annual Return must be prepared in respect of each reporting period, except as provided below.</i> <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>	Evidence provided for the submission of EPL Annual Returns for 2020, 2021 & 2023.	C
R1	R1.3	<i>Where this licence is transferred from the licensee to a new licensee:</i> a) <i>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</i>	EPL has not been transferred	NT

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
		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. Note: An application to transfer a licence must be made in the approved form for this purpose.		
R1	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.	EPL has not been transferred	NT
R1	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').	Evidence provided for the submission of EPL Annual Returns for 2020, 2021 & 2023.	C
R1	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.	Evidence provided for the submission of EPL Annual Returns for 2020, 2021 & 2023.	C
R1	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	Evidence provided for the submission of EPL Annual Returns for 2020, 2021 & 2023.	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
		<i>licence holder.</i>		
R2	R2.1	Notification of environmental harm <i>Notifications must be made by telephoning the Environment Line service on 131 555.</i>	No material harm incidents in the audit period	NT
R2	R2.2	<i>The licensee must provide written details of the notification to the EPA within 7 days of the date on which the incident occurred.</i> <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>	No material harm incidents in the audit period	NT
R3	R3.1	Written report <i>Where an authorised officer of the EPA suspects on reasonable grounds that:</i> <i>a) where this licence applies to premises, an event has occurred at the premises; or</i> <i>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.</i>	No requests made	NT

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
R3	R3.2	<i>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.</i>	No requests made	NT
R3	R3.3	<i>The request may require a report which includes any or all of the following information:</i> <i>a) the cause, time and duration of the event;</i> <i>b) the type, volume and concentration of every pollutant discharged as a result of the event;</i> <i>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;</i> <i>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;</i> <i>e) action taken by the licensee in relation to the event, including any follow-up contact with any complainants;</i> <i>f) details of any measure taken or proposed to be taken to prevent or mitigate against a recurrence of such an event; and</i> <i>g) any other relevant matters.</i>	No requests made	NT
R3	R3.4	<i>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.</i>	No requests made	NT
R4	R4.1	Other reporting conditions <i>Noise Reporting</i>	No noise exceedances	NT

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
		<i>The licensee must notify the EPA as soon as practicable of an exceedance of any of the noise limits detailed in this licence.</i>		
R4	R4.2	The licensee must supply annually, with the Annual Return, copies of the noise reports for each of the required monitoring events as detailed in this licence.	Annual Return and monitoring reports are available on the website. Noise reports contained within these.	C
R4	R4.3	<i>Water Monitoring Report</i> <i>A water quality monitoring report must be prepared and submitted annually with the Annual Return that details the results of the water quality sampling undertaken. This report must include graphs of water quality results at each site, for each parameter, showing results since the commencement of monitoring at the premises. This report must include an assessment of the results and details actions which will be taken if monitoring detects adverse changes to water quality as a result of operations at the premises.</i>	Annual Return and monitoring reports are available on the website. Water Monitoring reports contained within these.	C
R4	R4.4.	<i>Ambient Air Quality Reporting</i> <i>Where any ambient PM10 monitoring result approaches or exceeds 50 ug/m3 the licensee must undertake an investigation to ascertain the reason for the elevated result and supply a report to the EPA with the Annual Return that explains the reason for the elevated PM10 that was recorded.</i>	Elevated PM10 result in August 2022 was due to dust on Janet Parade. Redisand is in the process to get this maintenance issue resolved.	C
7	GENERAL CONDITIONS			
G1	G1.1	<i>Copy of licence kept at the premises or plant</i> <i>A copy of this licence must be kept at the premises to which the licence applies.</i>	A copy is kept on site and is accessible to all staff	C

ID No.	EPL Part & Req. No.	EPL Requirement	Audit Findings	Compliance rating
G1	G1.2	The licence must be produced to any authorised officer of the EPA who asks to see it.	Noted	C
G1	G1.3	<i>The licence must be available for inspection by any employee or agent of the licensee working at the premises.</i>	Noted	C

Appendix E – Consultation

Consultation with DPHI

From: Jennifer Sage <jennifer.sage@dpie.nsw.gov.au>
Sent: Wednesday, 17 April 2024 9:41 AM
To: Sanan Qasim
Cc: Grant Brown; Barbara Pater
Subject: RE: Salt Ash Sand Project - Independent Environmental Operational Audit

EXTERNAL

Hello Sanan

Thank you for your email and request for input to the scope of the independent environmental audit for Salt Ash Sand Quarry.

Please liaise with the following stakeholders, if you haven't already –

- Port Stephens Council
- NSW Environment Protection Authority
- Department of Climate Change, Energy, the Environment and Water (Water Group)
- The Community Consultative Committee for the development.

I appreciate that you may not have time to receive a response from these agencies prior to undertaking audit/inspection. My apologies for not responding earlier.

The audit should focus on –

- Monitoring and management of groundwater impacts
- Water management
- Rehabilitation of quarry stages
- Monitoring and management of biodiversity at the development and offset properties.
- Review and revision of plans, programs and strategies.

Please contact me if you have any questions.

Regards
Jen

Jennifer Sage
Senior Compliance Officer
Development Assessment and Infrastructure
Department of Planning, Housing and Infrastructure

M 0400 245 170 **T** (02) 6575 3420 **E** jennifer.sage@dpie.nsw.gov.au

dphi.nsw.gov.au





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

Please consider the environment before printing this email.

From: Sanan Qasim <Sanan.Qasim@app.com.au>
Sent: Monday, 8 April 2024 12:17 PM
To: DPE PSVC Compliance Mailbox <compliance@planning.nsw.gov.au>
Cc: Grant Brown <Grant.Brown@app.com.au>; Barbara Pater <Barbara.Pater@app.com.au>
Subject: Salt Ash Sand Project - Independent Environmental Operational Audit

Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit for the operation of the Salt Ash Sand Project, as a requirement of Development Consent SSD-07_0094.

The audit will be conducted on the 22nd & 23rd of April 2024 and will review compliance in accordance with SSD-07_0094 Schedules 2, 3, 4 and 5.

In line with the consultation requirements of the Department of Planning and Environment's guideline *Independent Audit Post Approval Requirements* (IAPAR 2020), Section 3.2, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the scope of this audit.

Kind Regards,

Sanan Qasim
Junior Consultant – HSEQ Systems and Auditing



0423 736 753 | sanan.qasim@app.com.au
Gadigal Country | Level 14, 10 Spring Street, Sydney NSW 2000

The APP Group acknowledges Aboriginal and Torres Strait Islander Peoples as the Traditional Custodians of the Land, Rivers and Sea. We acknowledge and pay our respects to Elders past, present and emerging.

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Consultation with Port Stephens

From: Ryan Falkenmire <Ryan.Falkenmire@portstephens.nsw.gov.au>
Sent: Wednesday, 17 April 2024 3:37 PM
To: Grant Brown
Cc: Barbara Pater; Sanan Qasim
Subject: RE: Salt Ash Sand Project - Independent Environmental Operational Audit

EXTERNAL

Hi Grant,

Thanks for contacting Council on this matter.

There is no specific concern in relation to the Salt Ash Sand Project that would inform the scope of the audit. Although, Council is mindful of potential encroachment into the vegetation buffers surrounding the extraction areas. There is known sensitive biodiversity in these areas and nearby power easement.

Kind Regards,



Ryan Falkenmire
Development Planning Coordinator

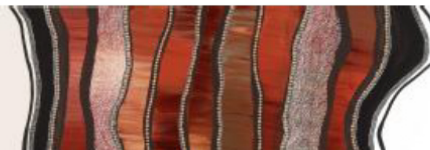
p 02 4988 0562 | m 0428 623 300
w portstephens.nsw.gov.au



Community Satisfaction Survey now open – have your say

[Start survey](#)

We acknowledge the Worimi people as the original Custodians and inhabitants of Port Stephens. We acknowledge and pay respects to Worimi elders past and present. May we walk the road to tomorrow with mutual respect and admiration as we care for the beautiful land and waterways together.
Artwork by Adam Manning.



From: Grant Brown <Grant.Brown@app.com.au>
Sent: Wednesday, 10 April 2024 3:15 PM
To: Ryan Falkenmire <Ryan.Falkenmire@portstephens.nsw.gov.au>
Cc: Barbara Pater <Barbara.Pater@app.com.au>; Sanan Qasim <Sanan.Qasim@app.com.au>
Subject: Salt Ash Sand Project - Independent Environmental Operational Audit

Dear Ryan,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit for the operation of the Salt Ash Sand Project, as a requirement of Development Consent SSD-07_0094.

The audit will be conducted on the 22nd & 23rd of April 2024 and will review compliance in accordance with SSD-07_0094 Schedules 2, 3, 4 and 5.

In line with the consultation requirements of the Department of Planning and Environment's guideline *Independent Audit Post Approval Requirements* (IAPAR 2020), Section 3.2, APP seeks your input into the scope of the audit and advice on any particular areas where you would like us to focus on.

Please also advise if you wish for any stakeholders to be contacted to obtain their input into the scope of this audit.

Kind Regards,

Grant Brown
Senior Environmental Consultant



0499 978 339 | grant.brown@app.com.au | app.com.au
Turrbal and Jagera Country | 29B, 10 Eagle Street Brisbane 4000



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Consultation with NSW Environment Protection Authority



DOC24/298132-1

The APP Group
Attention: Sanan Qasim
Level 14, 10 Spring Street
SYDNEY NSW 2000

By email: sanan.qasim@app.com.au
grant.brown@app.com.au

8 May 2024

Dear Sanan Qasim

Salt Ash Sand Quarry – Independent Environmental Audit

I refer to your email dated 17 April 2024 regarding input into the Independent Environmental Audit of the Salt Ash Sand Quarry.

The NSW Environment Protection Authority (EPA) encourages independent audit towards proponents improving their environmental performance. We do not provide input as our role is to set environmental objectives for environmental/conservation management and manage outcomes.

I refer you to the EPA's public register <http://www.epa.nsw.gov.au/prpoeo/index.htm> where you can search for regulatory activity undertaken by the EPA for Environment Protection Licence 13406 for the Salt Ash Sand Quarry.

If you require any further information regarding this matter, please contact me on (02) 4908 6808.

Yours sincerely



ANTHONY VAN DER HORST
Operations Officer

Phone 131 555

Phone +61 2 9995 5555
(from outside NSW)

TTY 133 677

ABN 43 692 285 758

Locked Bag 5022

Parramatta
NSW 2124 Australia

4 Parramatta Square

12 Darcy St, Parramatta
NSW 2150 Australia

info@epa.nsw.gov.au

www.epa.nsw.gov.au

From: Sanan Qasim
Sent: Wednesday, 17 April 2024 10:45 AM
To: info@epa.nsw.gov.au
Cc: Grant Brown
Subject: Salt Ash Sand Project - Independent Environmental Operational Audit

Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit for the operation of Salt Ash Sand Quarry, as a requirement of Development Consent SSD-07_0094.

The audit will be conducted on the 22nd & 23rd of April 2024 and will review compliance in accordance with SSD-07_0094 Schedules 2, 3, 4 and 5.

In line with the consultation requirements of the Department of Planning and Environment's guideline *Independent Audit Post Approval Requirements 2020, Section 3.2*, and as requested by the Department, APP seeks your input in relation to this project and advice on any particular areas where you would like us to focus on for the environmental review at this stage of the construction.

Kind Regards,

Sanan Qasim
Junior Consultant – HSEQ Systems and Auditing



0423 736 753 | sanan.qasim@app.com.au
Gadigal Country | Level 14, 10 Spring Street, Sydney NSW 2000

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Consultation with Department of Climate Change, Energy, the Environment and Water (Water Group)

From: Audit <Audit@dcceew.gov.au>
Sent: Tuesday, 23 April 2024 3:54 PM
To: Sanan Qasim
Subject: FW: Webform submission from: Contact us [SEC=OFFICIAL]

EXTERNAL

Good afternoon Sanan,

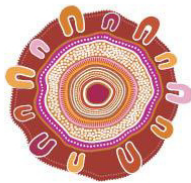
Thank you for your email and opportunity to provide input into the audit. At this stage we don't have any advice or focus areas for you.

Kind regards

Chris

Environmental Audit Section
Compliance and Enforcement Branch | Environmental Permitting and Compliance Division
Department of Climate Change, Energy, the Environment and Water
Ngunnawal Country, John Gorton Building, King Edward Terrace, Parkes ACT 2600 Australia, GPO Box 3090

DCCEEW.gov.au ABN 63 573 932 849



Acknowledgement of Country

Our department recognises the First Peoples of this nation and their ongoing connection to culture and country. We acknowledge Aboriginal and Torres Strait Islander Peoples as the Traditional Owners, Custodians and Lore Keepers of the world's oldest living culture and pay respects to their Elders past, present and emerging.



Please consider the environment before printing this e-mail.

From: DCCEEW <dcceew.noreply@govcms.gov.au>
Sent: Thursday, April 18, 2024 2:24 PM
To: Environment Compliance <Environment.compliance@dcceew.gov.au>
Subject: Webform submission from: Contact us

My enquiry is about:
Environmental compliance matters

Comments
Dear Sir/Madam,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit for the operation of Salt Ash Sand Quarry, as a requirement of Development Consent SSD-07_0094.

The audit will be conducted on the 22nd & 23rd of April 2024 and will review compliance in accordance with SSD-07_0094 Schedules 2, 3, 4 and 5.

In line with the consultation requirements of the Department of Planning and Environment's guideline Independent Audit Post Approval Requirements 2020, Section 3.2, and as requested by the Department, APP seeks your input in relation to this project and advice on any particular areas where you would like us to focus on for the environmental review at this stage of the construction.

Kind Regards,
Sanan Qasim

Would you like a reply?
Yes

Your name
Sanan Qasim

Email
Sanan.Qasim@app.com.au

Phone
0423736753

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Consultation with Community Consultative Committee for the Development

From: Lisa Andrews <lisaandrews.ic@gmail.com>
Sent: Friday, 3 May 2024 11:20 AM
To: Sanan Qasim
Subject: Re: Salt Ash Sand Project - Independent Environmental Operational Audit

EXTERNAL

Thank you for your email. The Salt Ash Sand Project Community Consultative Committee operates in accordance with the consent condition and meets on an annual basis. There are only 3 members on the CCC, neighbours and a Port Stephens Council representative.

There are no issues of concern from the CCC.

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 Thu, Apr 18, 2024 at 2:58 PM Sanan Qasim <Sanan.Qasim@app.com.au> wrote:

Dear Lisa,

I am writing to advise that The APP Group – HSEQ Systems and Auditing (APP) will be conducting the Independent Environmental Audit for the operation of Salt Ash Sand Quarry, as a requirement of Development Consent SSD-07_0094.

The audit will be conducted on the 22nd & 23rd of April 2024 and will review compliance in accordance with SSD-07_0094 Schedules 2, 3, 4 and 5.

In line with the consultation requirements of the Department of Planning and Environment's guideline *Independent Audit Post Approval Requirements 2020, Section 3.2*, and as requested by the Department, APP seeks your input in relation to this project and advice on any particular areas where you would like us to focus on for the environmental review at this stage of the operation.

Kind Regards,

Sanan Qasim

Junior Consultant – HSEQ Systems and Auditing



0423 736 753 | sanan.qasim@app.com.au

Gadigal Country | Level 14, 10 Spring Street, Sydney NSW 2000

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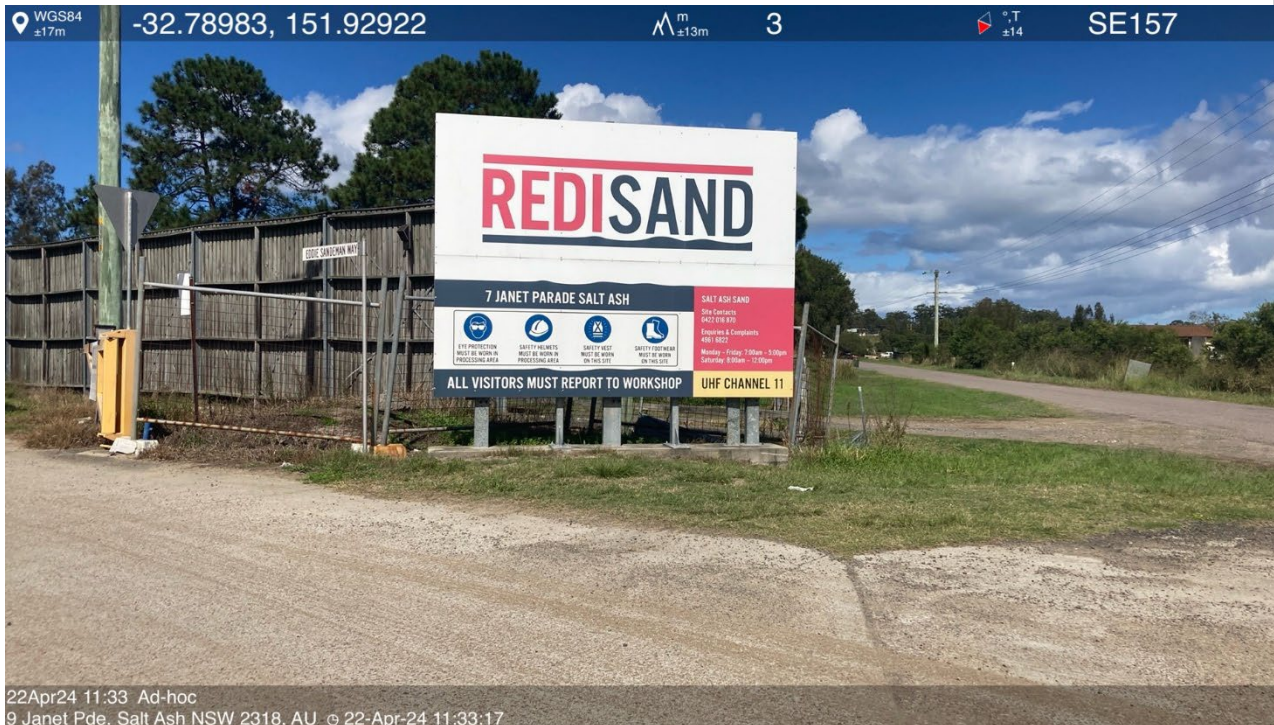
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APP Corporation Pty Limited, ABN 29 003 764 770.

Appendix F – Audit Photos

Audit Photos – 22 April 2024 Redisand Salt Ash Quarry

Audit Photos – 22 April 2024



Site entrance project information on display, 7 Janet Parade



PM2.5 & PM10 dust monitoring, front entrance

Audit Photos – 22 April 2024



Dust deposition gauge, front entrance



22Apr24 14:12:2024 Ad-hoc
Salt Ash NSW 2318, Australia © 22-Apr-24 14:12:22

Noise wall, front entrance

Audit Photos – 22 April 2024



Cultural heritage no go zone signage

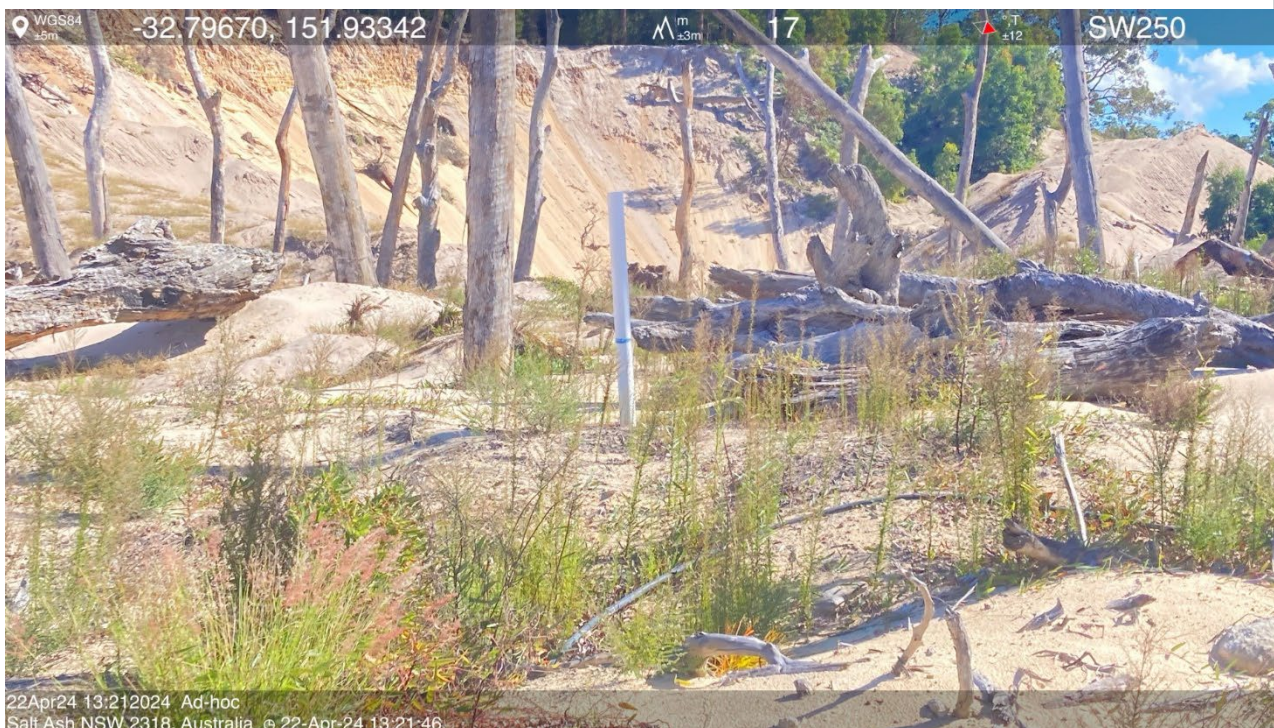


Sand screening and wash plant

Audit Photos – 22 April 2024



Lower retention basin

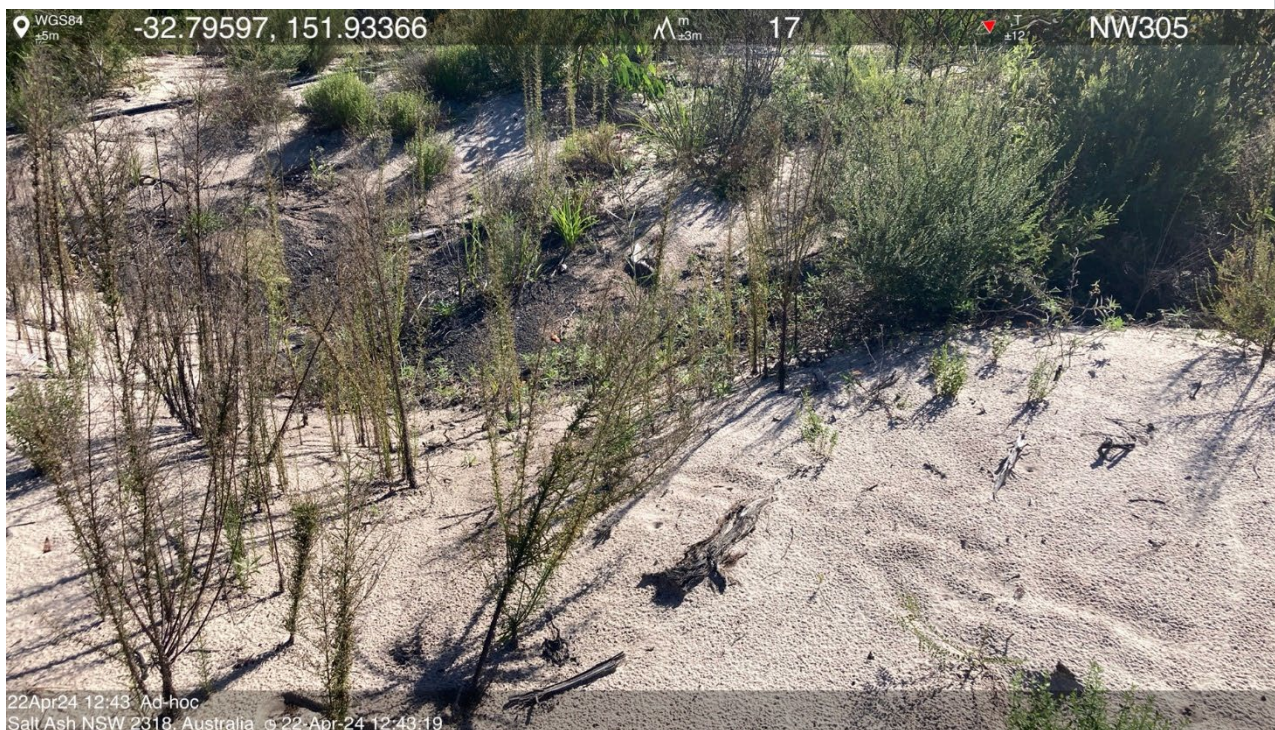


RL indicator

Audit Photos – 22 April 2024



Progressive rehabilitation



Progressive rehabilitation

Audit Photos – 22 April 2024



Progressive rehabilitation



Power easement buffer zone flagging

Audit Photos – 22 April 2024



Power easement recently cleared & maintained by utility contractor



Vegetated buffer with perimeter tape visible

Audit Photos – 22 April 2024



Quarry operations



Truck load out on approach to weighbridge

Audit Photos – 22 April 2024



Bunded workshop area



Bunded pallet for fuel storage

Audit Photos – 22 April 2024



Hazardous goods cabinet



Spill kit in workshop

Audit Photos – 22 April 2024



Traffic speed sign at quarry entrance



Traffic speed sign within the quarry

Audit Photos – 22 April 2024



Rumble grid



Buffer zone & signage

Audit Photos – 22 April 2024



Buffer zone & signage



Buffer zone & signage

Audit Photos – 22 April 2024



Buffer zone & signage



Buffer zone & signage

Audit Photos – 22 April 2024



Nest box



Re-used hollow

Audit Photos – 22 April 2024



Re-used hollow

Appendix G – Ecosure Report

Project Name: PR8943 Salt Ash Sand Quarry Independent Environmental Review
Date: 22 November 2024

Attn: Grant Brown

The APP Group
29B, 10 Eagle Street
Brisbane
QLD 4000

Dear Grant

RE: PR8943 Salt Ash Sand Quarry Independent Environmental Review

Ecosure was engaged to participate in the 2024 Independent Environmental Audit (IEA) of the Salt Ash Sand Quarry alongside The APP Group and Integrated Environmental Management Australia (IEMA). The Salt Ash Quarry is located off Janet Parade, Salt Ash, near Newcastle (Lot 2 DP 1172862). It covers approximately 39 ha and is owned by ATB Morton and operated by Redisand. The quarry was initially granted project approval in October 2010 to undertake sand extraction activities until 2030, operating under environmental Protection License number 13218.

The 2024 Salt Ash Sand Quarry IEA was submitted to the NSW Department of Planning, Housing and Infrastructure (DPHI) in June 2024, covering the period between October 2020 and October 2023. This letter report aims to respond to a subsequent Request for Information (RFI) received from DPHI in October 2024 (Appendix 1), and specifically the following points:

1. **Audit team** - *The audit was not conducted by the team of experts endorsed by the Planning Secretary, which included specialists in biodiversity, groundwater and rehabilitation. NSW Planning considers that these experts should assess the conditions of approval that relate to their area of expertise, and conduct the reviews and assessments required by paragraphs 3.i and 3.iii below.*
3. **Audit scope**
The audit report must be revised to include:
 - i. *A review of the environmental performance of the development, including an assessment of actual impacts of the development compared to impacts predicted in the environmental impact assessment.*
 - ii. *A high-level assessment of whether the environmental strategies, plans and sub-plans, or programs are adequate.*

Ecosure reviewed consent conditions and Statement of Commitments (SOC) related to ecology, rehabilitation, and groundwater, as detailed in Appendix 3. The audit was approved by Dr Natalie Toon and Amanda Scott, DPHI endorsed specialists. Below is a summary of the audit methods, results, and recommendations.

Desktop review

A detailed desktop review of all relevant plans, reports and documents was undertaken, including the following key items:

- 2024 IEA checklist, including development consent conditions and statement of commitments (IEMA 2024)
- Landscape and Rehabilitation Management Plan (Redisand 2021a)
- Groundwater Monitoring Plan (Redisand 2021b)
- Soil and Water Management Plan (Redisand 2021c)
- Acid Sulfate Soil Management Plan (Redisand 2021d)
- Annual Review reports for 2020-2023, including all appendices (Redisand 2021e, 2022-2024)
- BioBanking agreement 108 (NSW OEH 2016)
- Monitoring Reports For Biobanking Offset site (Firebird 2021-2023)
- Independent Audit Post Approval Requirements (DPIE 2020).

Information gaps were identified, and additional information or evidence was requested from the APP Group where required.

Results

The results of Ecosure's audit investigations are presented in Appendix 3.

Compliance criteria is in line with definitions given in Section 3.8 of the Independent Audit Post Approval Requirements (DPIE 2020), summarised in Table 1.

Table 1 Compliance criteria

Assessment	Criteria
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.

Salt Ash Quarry was found to be generally compliant in matters of biodiversity, rehabilitation and groundwater, with:

- five compliant conditions/commitments
- six non-compliant conditions/commitments (generally minor or administrative non-compliances, or where compliance status could not be determined based on the evidence reviewed by Ecosure)
- four conditions/commitments not triggered.

Recommendations to demonstrate compliance going forward have been included.

Performance against project approvals

Ecosure are satisfied that preparation and implementation of the environmental strategies, plans and sub-plans are generally suitable to meet the consent conditions for the project, although some recommendations have been provided below. The impacts of development appear to be consistent with predicted impacts.

Summary of recommendations

The following measures have been recommended to ensure ongoing compliance with consent conditions and commitments:

- amend groundwater monitoring to include groundwater levels, rather than depth to water, measured from the Monument Height, in line with Schedule 3, Condition 17(c)
- update the Acid Sulfate Soil Management Plan, to include the outcome of predicted maximum groundwater level modelling, in line with Schedule 3, Condition 18(a)
- ensure compliance with the notification procedure when exceedances are identified in groundwater quality results, in line with Schedule 3, Condition 17(e), including additional training with relevant staff as required
- Annual Monitoring Reports should include further detail on:
 - the total number and condition of nest boxes and salvaged hollows, to ensure compliance with Statement of Commitment 1 regarding the number of compensatory nest boxes
 - the maintenance of prescribed buffer zones. It is understood that Redisand is in consultation with DPHI regarding an amendment to the approved buffer zones. However, until a formal agreement is reached, compliance must be with the buffer zones outlined in Schedule 3, Condition 21 and Statement of Commitment 1
 - weed control measures undertaken in the reporting period, the current coverage of weeds, and discussion around the need for future weed control measures, in line with Statement of Commitment 1
- a vegetation management plan for the Tomola offset site should be prepared and implemented, in line with Statement of Commitment 3.

We trust the information provided in this report meets your requirements. If you require any further detail, or would like to discuss our findings, please do not hesitate to contact Dr Natalie Toon, Amanda Scott or myself on 07 3606 1030.

Yours sincerely



Rachel McBride
Senior Ecologist

References

ATB Morton 2018, MP07_0094 (Salt Ash Sand Extraction Project) – Revised Rehabilitation Bond. Letter from Luke Johnson, ATB Morton to Joel Herbert, Department of Planning and Infrastructure.

Department of Planning, Industry and Environment (DPIE) 2020, *Independent Audit Post Approval Requirements*. Published by NSW Department of Planning, Industry and Environment.

Department of Planning and Environment (DPE) 2023, *Rehabilitation bond acceptance letter*. Letter from DPE to Redisand, dated 18 January 2023 .

IEMA 2024, *Salt Ash Quarry Independent Environmental Audit checklist V2*, Report to Redisand.

Firebird 2021, *Monitoring Report For Biodiversity Banking Agreement 108 Regarding Pola Fogal, Tomalla Lot 2 DP 707938 2021*, Report prepared by Firebird ecoSultants Pty Ltd.

Firebird 2022, *Monitoring Report For Biodiversity Banking Agreement 108 Regarding Pola Fogal, Tomalla Lot 2 DP 707938 2022*, Report prepared by Firebird ecoSultants Pty Ltd.

Firebird 2023, *Monitoring Report For Biodiversity Banking Agreement 108 Regarding Pola Fogal, Tomalla Lot 2 DP 707938 2023*, Report prepared by Firebird ecoSultants Pty Ltd.

NSW Office of Environment and Heritage (NSW OEH) 2016, *Biobanking agreement ID number 108*.

Redisand 2021a, *Salt Ash Sand Quarry Landscape and Rehabilitation Management Plan V5*, Report to ATB Morton Pty Ltd, July 2021.

Redisand 2021b, *Salt Ash Sand Quarry Soil and Water Management Plan V1*, Report to ATB Morton Pty Ltd, September 2021.

Redisand 2021c, *Salt Ash Sand Quarry Groundwater Monitoring Plan V1*, Report to ATB Morton Pty Ltd, September 2021.

Redisand 2021d, *Salt Ash Sand Quarry Acid Sulfate Soil Monitoring Plan V1*, Report to ATB Morton Pty Ltd, September 2021.

Redisand 2021e, *Salt Ash Sand Quarry Annual Review 2020 V2*, Report to ATB Morton Pty Ltd, July 2021.

Redisand 2022, *Salt Ash Sand Quarry Annual Review 2021 FINAL*, Report to ATB Morton Pty Ltd, March 2022.

Redisand 2023, *Salt Ash Sand Quarry Annual Review 2022 V1*, Report to ATB Morton Pty Ltd, March 2023.

Redisand 2024, *Salt Ash Sand Quarry Annual Review 2023*, Report to ATB Morton Pty Ltd, March 2024.

Appendix 1 DPHI RFI

Our ref: MP07_0094-PA-34

Grant Stevenson
Quarry Manager
A.T.B. Morton Pty Limited
Worimi Country
9 Janet Parade
SALT ASH NSW 2318

Copied to: APP Corporation Pty Ltd

14/10/2024

Subject: Salt Ash Quarry - 2024 Independent Environmental Audit

Dear Mr Stevenson

I refer to the 2024 Independent Environmental Audit (IEA) for Salt Ash Sand Quarry submitted as required by Schedule 5, Condition 10 of Project Approval 07_0094 as modified (the approval), to the NSW Department of Planning, Housing and Infrastructure (NSW Planning) on 9 July 2024.

NSW Planning has reviewed the IEA report and considers more information is required to satisfy the requirements of Schedule 5 Condition 9 of the approval and the *Independent Audit Post Approval Requirements* (2020) (IA PAR).

Under the provisions of Schedule 2, Condition 3 of the approval, as nominee of the Planning Secretary, I require ATB Morton Pty Ltd to submit an amended IEA report a response to this request for information (RFI-76806488) addressing the below points by 22 November 2024 (or as otherwise agreed by the Planning Secretary):

1. Audit team

The audit was not conducted by the team of experts endorsed by the Planning Secretary, which included specialists in biodiversity, groundwater and rehabilitation. NSW Planning considers that these experts should assess the conditions of approval that relate to their area of expertise, and conduct the reviews and assessments required by paragraphs 3.i and 3.iii below.

2. Declarations of independence

- i. The audit report includes declarations of independence that were made by the auditors before the audit, when seeking endorsement of the audit team by the Planning Secretary.

Declarations included in the audit report must be made after the audit is completed using the template at Appendix E of the IA PAR.

- ii. Remove from the audit report the declaration provided by Anita Rylah, who was not an approved auditor nor part of the audit team.

3. Audit scope

The audit report must be revised to include:

- i. A review of the environmental performance of the development, including an assessment of actual impacts of the development compared to impacts predicted in the environmental impact assessment.
- ii. The status of implementation of findings, recommendations and actions from the previous IEA.
- iii. A high-level assessment of whether the environmental strategies, plans and sub-plans, or programs are adequate.

Please refer to Section 3.3 of the IA PAR for details.

4. Evaluation of compliance

- i. The audit findings must be based on verifiable evidence, such as that listed in Section 3.7 of the IA PAR. Please revise the Audit Checklist at Appendix D to include the evidence used to assess the compliance status for conditions of approval. This should include but not necessarily be limited to the following conditions:
 - a. Schedule 3 Condition 21 Rehabilitation and Landscape Management – evidence that the buffer zones have been maintained to the requirements of this condition. The audit findings have been copied from the 2022 Annual Review.
 - b. Schedule 3 Condition 31 On-site Traffic Management – evidence that the quarry operator ensures vehicle speeds, covers loads and cleans vehicles before leaving the site, for example, signage, site procedures or codes of conduct.
 - c. Schedule 3 Condition 36 Waste Management – evidence that processes are in place to minimise waste, for example management plans, site procedures, inspection records, audit inspection.
 - d. Schedule 3 Condition 37 Waste Management – evidence to support the statement that no waste has originated from off-site, for example site inspection, interview, relevant management plans or strategies.

- e. Schedule 3 Condition 38 Dangerous Goods – evidence that dangerous goods are stored in accordance with DECC's *Storing and Handling Liquids: Environmental Protection – Participants Manual*.
 - f. Statement of Commitment 2 Vegetation Management - Weed Management – evidence of weed management carried out at the site, including annual monitoring.
 - g. Statement of Commitment 3 Vegetation Management - Offset Site – evidence to support the statement that monitoring has been undertaken.
 - h. Statement of Commitment 7 Visual Impact – evidence that rehabilitation and sand extraction is in accordance with the approved staging plan.
- ii. Please revise the compliance status for the following conditions:
- a. Schedule 3 Condition 29 and 29A – these conditions have not yet been triggered by increased truck movements.
 - b. Schedule 3 Condition 7 Non-compliance Notification – this condition has been assessed as being compliant, however on 23 November 2023, NSW Planning issued the quarry operator Redisand Pty Ltd (Redisand) a warning letter for failing to notify the Secretary of non-compliances. Further, the audit report identified that Redisand did not notify NSW Planning of the exceedance of groundwater criteria measured in June and September 2023.
 - c. Schedule 5 Condition 11 Access to Information – this has been assessed as compliant however at the time of our review the complaints register and minutes for the Community Consultative Committee were last updated in March 2022.

Should you wish to discuss the matter further, please contact Jennifer Sage, Senior Compliance officer on 02 6575 3420 or email compliance@planning.nsw.gov.au

Yours sincerely



Heidi Watters
Team Leader
Compliance

As nominee of the Planning Secretary

Appendix 2 Independent Audit Declaration Form

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	WPP Planning & Property
Title of Audit:	Independent Environmental Audit
Date:	19 November 2024

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 have acted professionally, objectively and in an unbiased manner;
- 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 the Auditor:	Dr Natalie Toon
Signature:	
Qualification:	PhD, Bsc
Company:	Ecosure
Company Address:	2/34 Thomson Street, Bowen Hills, QLD 4006

Independent Audit Declaration Form

Project Name:	Redisand Salt Ash Sand Quarry
Consent Number:	07_0094
Description of Project:	Redisand is a locally owned and operated supplier of bulk sand products, specialising in washed and brown sand. The facilities are located in Salt Ash, 30km north of Newcastle and 160km north of Sydney. It has been built with the latest technology to help deliver high volume quality with minimal impact to the environment. Redisand has been supplying bulk sand to some of the State's largest construction companies and landscape yards since 2015.
Project Address:	7 Janet Parade, Salt Ash, NSW, 2318 Australia
Proponent:	WPP Planning & Property
Title of Audit:	Independent Environmental Audit
Date:	19 November 2024

I declare that:

- ii. 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;
- iii. 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;
- iv. 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;
- v. I have acted professionally, objectively and in an unbiased manner;
- vi. 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:

- b. 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
- c. 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 the Auditor:	Amanda Scott
Signature:	
Qualification:	BSc
Company:	Ecosure
Company Address:	2/34 Thomson Street, Bowen Hills, QLD 4006

Appendix 3 Audit results

Condition of Consent	Requirement (exact wording)	Evidence reviewed by Ecosure	Findings and Recommendations - Ecosure Review	Compliance Status - IEMA 2024	Compliance Status – Ecosure Review
Groundwater					
Schedule 3, Condition 14	Management and Monitoring The Applicant must prepare a Soil and Water Management Plan for the development to the satisfaction of the Secretary. This plan must: a) be prepared in consultation with DPE Water; b) include a(n): - o Erosion and Sediment Control Plan; - o Surface Water Monitoring Program; - o Groundwater Monitoring Program; - o Acid Sulfate Soils Management Plan; and c) be submitted to the Secretary for approval prior to commencing quarrying operations, and to carrying out any construction activities in the case of the Erosion and Sediment Control Plan. The Applicant must implement the plan as approved by the Secretary.	Soil and Water Management Plan (Redisand 2021b) a) Section 2 – Consultation b) Appendix A - Erosion and Sediment Control Plan - Appendix B - Surface Water Monitoring Program - Appendix C - Groundwater Monitoring Program - Appendix D - Acid Sulfate Soils Management Plan c) The SWMP was submitted to the Secretary prior to quarrying operations commencing, Annual Reviews 2020 – 2023 (Redisand 2021e – 2024).	The Soil and Water Management Plan has been developed in compliance with the consent condition. The SWMP was submitted to the Secretary prior to quarrying operations commencing, with Version 1 again submitted on 21 July 2021. Evidence from the Annual Review reports between 2020 and 2023 demonstrate that the Soil and Water Management Plan is being implemented.	Compliant	Compliant
Schedule 3, Condition 17	The Ground Water Monitoring Program must include: a) detailed baseline data on groundwater levels and quality, based on statistical analysis; b) groundwater impact assessment criteria; c) a program to monitor ground water levels and quality; d) a program to monitor ground water level effects on groundwater dependent vegetation; and e) a protocol for the investigation, notification and mitigation of identified exceedances of the groundwater impact assessment criteria.	Groundwater Monitoring Plan (Redisand 2021b) a) Section 2 - Groundwater Data b) Section 4.4 - Water Level and Quality Criteria c) Section 4.2 - Frequency of Monitoring and Sampling, and Section 4.3 - Monitoring and Sampling Methodology d) Section 4.3 includes groundwater dependent vegetation e) Section 5 “Contingencies.	The following non-compliances were recorded in the 2023 Annual Review (Redisand 2024): · Redisand has recorded an administrative non-compliance for Schedule 3, Condition 17, as the current groundwater monitoring does not include groundwater levels, but rather depth to water, measured from the Monument Height. Therefore, noncompliance with Schedule 3, Condition 17(c). · Redisand failed to notify DPHI and the Environment Protection Authority of arsenic levels above criteria levels in June and September 2023 monitoring reports. It is noted that no monitoring occurred at borehole (BH) 1 between 2020 and Q2 2022 as the well was lost to quarrying operations. In addition, only one sample was collected from BH6 between 2020 and 2023 due to dry conditions. If dry conditions continue at this BH, Ecosure recommend an assessment by a hydrogeologist to ascertain if there is a more suitable BH location.	Non-compliant	Non-compliant
Schedule 3, Condition 18	The Acid Sulfate Soils Management Plan must include: a) the outcome of groundwater modelling to establish the maximum predicted groundwater level for the site; b) measures to avoid the extraction of acid sulfate soils and potential acid soils; and c) a contingency plan to manage any acid sulfate soils and potentially acid sulfate soils inadvertently encountered during extraction and processing operations.	Acid Sulfate Soil Management Plan (Redisand 2021b) a) n/a b) Section 5 - Monitoring Plan and Procedures c) Section 6 – Contingencies.	The predicted maximum groundwater level is stated in the Acid Sulfate Soil Management Plan, however the outcome of modelling is not found within the report. The Ground Water Monitoring Program states that no specific groundwater modelling carried out on this site, and instead results of groundwater level modelling from a neighbouring site are considered appropriate to use. It is recommended that endorsement from DPHI is sought for this approach.	Non-compliant	Non-compliant

Rehabilitation

Condition of Consent	Requirement (exact wording)	Evidence reviewed by Ecosure	Findings and Recommendations - Ecosure Review	Compliance Status - IEMA 2024	Compliance Status – Ecosure Review
Schedule 3, Condition 19	Biodiversity offset strategy By February 15 2015, the Applicant must: a) enter into a Biobanking agreement for the offset area with the Minister for Environment and Heritage, in accordance with Part 7A of the Threatened Species Conservation Act 1995, to implement the Biodiversity Offset Strategy summarised in Table 6; b) ensure that adequate resources are dedicated towards the implementing the Biodiversity Offset Strategy; and c) provide appropriate long-term security for this offset; to the satisfaction of the Secretary.	N/A	The timing trigger is not within the temporal scope of this audit.	Not triggered	Not triggered
Schedule 3, Condition 20	Rehabilitation and Landscape Management The Applicant must rehabilitate the site to the satisfaction of the Secretary.	Landscape and Rehabilitation Management Plan (Redisand 2021a). Annual Reviews 2020 – 2023 (Redisand 2021e – 2024).	Compliance with this condition cannot be assessed until the operational phase of the project is complete, however in accordance with the Landscape and Rehabilitation Management Plan, Redisand is required to progressively rehabilitate and stabilise disturbed areas during the operational phase. Evidence from the Annual Review reports between 2020 and 2023 demonstrate that rehabilitation is being implemented.	Not triggered	Not triggered
Schedule 3, Condition 21	The Applicant must maintain, except for the purposes of access to the areas of quarrying operations as shown in Figure 1 of Appendix 1: a) a minimum 50 m buffer of undisturbed vegetation between extraction areas and the nearest edge of BCD estate; b) a minimum 50 m buffer of undisturbed vegetation between the extraction areas and any Swamp Sclerophyll Forest Endangered Ecological Community; c) a minimum 50 m buffer of undisturbed vegetation on each side of the northern power line easement on the development site. d) a minimum 30 m buffer of undisturbed vegetation between the extraction areas and the boundary of the site, unless a private agreement exists with the relevant landowner to reduce this buffer adjacent to that relevant landowner's property and a copy of this agreement is provided to the Department; e) minimum 30 m buffer of undisturbed vegetation on the northern margin of the extraction areas; and f) a buffer of undisturbed vegetation on land below 8 m AHD on the northern margin of quarrying operations.	Landscape and Rehabilitation Management Plan (Redisand 2021a). Annual Reviews 2020 – 2024 (Redisand 2021e – 2024).	The following non-compliances were recorded in the 2023 Annual Review (Redisand 2024): · There have been historical non-compliances regarding buffer zone boundaries and since 2020, Redisand has been consulting with DPHI to modify their original EA so that they can rectify these issues. This consultation is still ongoing. In the meantime, Redisand continues to maintain the area around the buffer zones and report the progress in the Annual Reviews. The DPHI RFI (Appendix 1) requests further evidence that the buffer zones have been maintained to the requirements of this condition, including photographs. No evidence has been sighted by Ecosure to demonstrate that the buffer zones are being adhered to or maintained.	Compliant	Non-compliant (can not be determined).
Schedule 3, Condition 22	Prior to the commencement of quarrying operations, the Applicant must establish, and subsequently vegetate and maintain: a) a 6 m high acoustic bund around the development's fixed plant; and b) a 3 m high acoustic fence along the southern boundary of the quarry access road, c) to the satisfaction of the Secretary Note: The vegetated bunds must be detailed in the Landscape Management Plan	N/A	The timing trigger is not within the temporal scope of this audit,	Not triggered	Not triggered
Schedule 3, Condition 23	Landscape Management Plan The Applicant must prepare a Landscape Management Plan for the development to the satisfaction of the Secretary. This plan must: a) be prepared by suitably qualified person(s), approved by the	Landscape and Rehabilitation Management Plan (Redisand 2021). a) Section 4.1, Table 2 – Statutory Requirements	The Landscape and Rehabilitation Management Plan has been prepared, submitted, approved and is compliant with consent conditions.	Compliant	Compliant

Condition of Consent	Requirement (exact wording)	Evidence reviewed by Ecosure	Findings and Recommendations - Ecosure Review	Compliance Status - IEMA 2024	Compliance Status – Ecosure Review
	Secretary; and in consultation with Council; b) be submitted to the Secretary for approval prior to commencing quarrying operations; and c) include a Rehabilitation Management Plan; and a Long-term Management Strategy.	b) Section 4.1, Table 2 – Statutory Requirements c) Section 7 – Rehabilitation Management and Section 8 – Long-Term Management Strategy.			
Schedule 3, Condition 24	The Rehabilitation Management Plan must include: a) the rehabilitation objectives for the site; b) a description of the measures that would be implemented to: · rehabilitate and stabilise the site; · minimise the removal of mature trees; and · manage the remnant vegetation and habitat on the site; c) detailed performance and completion criteria for the rehabilitation and stabilisation of the site; d) a detailed description of how the performance of the rehabilitation of the quarry would be monitored over time to achieve the stated objectives; e) a detailed description of what measures would be implemented to rehabilitate and manage the landscape of the site, including the procedures to be implemented for: · progressively rehabilitating and stabilising areas disturbed by quarrying; · implementing revegetation and regeneration within the disturbance areas; · protecting areas outside the disturbance areas, including groundwater dependent ecosystems; · vegetation clearing protocols, including a protocol for clearing any trees containing hollows and the relocation of hollows from felled trees; · managing impacts on fauna; · controlling terrestrial and aquatic weeds and pests; · controlling access; · bushfire management; and · reducing the visual impacts of the development; f) a description of the potential risks to successful rehabilitation, and a description of the contingency measures that would be implemented to mitigate these risks; and g) details of who is responsible for monitoring, reviewing, and implementing the plan.	Landscape and Rehabilitation Management Plan (Redisand 2021). a) Section 7.1 – Rehabilitation Management Objectives b) Section 7 - Rehabilitation Management c) Section 7.6 – Performance Completion Criteria d) Section 7.5 - Rehabilitation Inspections and Rehabilitation Monitoring e) Section 6 – Biodiversity and Clearing Management; and Section 7 – Rehabilitation Management f) Section 7.10 – Risk Management and Contingencies g) Section 11 – Roles and Responsibilities. Annual Reviews 2020 – 2023 (Redisand 2021e – 2024).	The Landscape and Rehabilitation Management Plan is compliant with consent conditions. Evidence from the Annual Review reports between 2020 and 2023 demonstrate that the Landscape and Rehabilitation Management Plan is being implemented.	Compliant	Compliant
Schedule 3, Condition 25	The Long Term Management Strategy must: a) define the objectives and criteria for quarry closure and post-extraction management; b) investigate and/or describe options for the future use of the site; c) describe the measures that would be implemented to minimise or manage the ongoing environmental effects of the development; and d) describe how the performance of these measures would be monitored over time.	Landscape and Rehabilitation Management Plan (Redisand 2021) – Section 8 Long Term Management Strategy a) Section 8.1 – Statutory Requirements b) Section 8.4 - Options for Future Use of Site c) Section 8.5 - Management of Ongoing Environmental Effects d) Section 8.6 - Monitoring of Performance Measures.	The Long Term Management Strategy presented in the Landscape and Rehabilitation Management Plan is compliant with consent conditions.	Compliant	Compliant

Condition of Consent	Requirement (exact wording)	Evidence reviewed by Ecosure	Findings and Recommendations - Ecosure Review	Compliance Status - IEMA 2024	Compliance Status – Ecosure Review
Schedule 3, Condition 26	Rehabilitation Bond Prior to commencing quarrying operations, the Applicant must lodge a rehabilitation bond for the development with the Secretary. The sum of the bond must be calculated as either: a) \$2.50/m2 for the area to be disturbed for the first 3 years of quarrying operations; or b) in accordance with the NSW Industry and Investment Rehabilitation Cost Estimate Guidelines 2010, to the satisfaction of the Secretary.	Revised Rehabilitation Bond (ATB Morton 2018).	The timing trigger is not within the temporal scope of this audit, however evidence has been sighted to demonstrate that ATB Morton Pty Ltd guaranteed an amount of \$64,225.00 to DPE on 22 March 2018, and \$106,000.0 on 13 February 2015.	Compliant	Not triggered
Schedule 3, Condition 27	Within 3 months of each Independent Environmental Audit (see condition 8 of schedule 5), the Applicant must review, and if necessary revise, the sum of the rehabilitation bond to the satisfaction of the Secretary. This review must consider: (a) the effects of inflation; (b) the area proposed to be disturbed in the next 3 years and any changes to the total area of disturbance; and (c) the performance of the rehabilitation to date.	Rehabilitation bond letter (DPE 2023).	The Rehabilitation Bond was reviewed and revised after the completion of the previous Independent Environmental Audit and was submitted to the Department on 23 February 2022 (Redisand 2023). The review considers the value of the bond at the time, the area of disturbance and rehabilitation at the time, and the estimated area of disturbance over the next 3 years, and the proposed bond to cover the estimated net disturbance. Letter dated 18 January 2023 from DPE confirmed acceptance of the rehabilitation bond calculation.	Compliant	Compliant
Statement of Commitment 2	Vegetation Management – Salt Ash A comprehensive Vegetation Management Plan will be prepared to address the staged clearing program within the extraction footprint. This plan is to be endorsed by NSW Department of Planning and Environment prior to the commencement of clearing or earthworks. The plan shall have regard to the following matters, as outlined in the Orogen 2008 report: Vegetation Clearing Management · All contractors conducting clearing, earthworks or construction activities within the subject site are to be informed of the restrictions to the clearing of vegetation outside the exclusion fencing. A construction protocol would be prepared requiring all earthworks, machinery and personnel be strictly controlled and restricted to the extraction footprint. No storage of materials, vehicle parking or other disturbance would be undertaken outside the exclusion fencing. Contractors would be supplied with the construction protocol regarding the clearing restrictions through a work induction program; · Trees are to be felled away from the retained bushland on the subject site back into the extraction area; and · Domestic fauna (i.e. dogs) are prohibited from entering the subject site with Contractors. Weed Management A Weed Management Program is to be adopted to control weeds in buffer zones, retained swamp forest habitats and future extraction stages to minimise edge effects and future extraction stages. The program is to comprise annual monitoring to assess weed coverage and determine the need for future weed control. Pre Clearing Surveys Fauna surveys are required prior to vegetation clearing for each staged extraction area. Surveys shall target Threatened species known or potentially occurring in the locality and will involve the following steps four nights prior to staged clearing activities: · searches for nests of threatened raptors;	Landscape and Rehabilitation Management Plan (Redisand 2021). Annual Reviews 2020 – 2023 (Redisand 2021e – 2024).	The Landscape and Rehabilitation Management Plan is compliant with the Statement of Commitment for the purposes of vegetation management and has been endorsed by the Secretary. The DPHI RFI (Appendix 1) requests evidence of weed management carried out at the site, including annual monitoring. Evidence from the Annual Review reports between 2020 and 2023 demonstrate this statement of commitment is generally being met, with evidence of pre-clearing surveys and ecological supervision during vegetation clearing, as well as the implementation of staged rehabilitation. No information is given on the weed management actions undertaken during the reporting period, the current extent of weed coverage across the site, nor the need for future weed control measures. Ecosure has not seen evidence of weed spraying or treatment, nor have we been involved in site inspections to understand the current presence or abundance of weeds. It is recommended that future Annual Reviews also include reporting on the weed control actions outlined in the Statement of Commitment.	Compliant	Non-compliant (can not be determined).

Condition of Consent	Requirement (exact wording)	Evidence reviewed by Ecosure	Findings and Recommendations - Ecosure Review	Compliance Status - IEMA 2024	Compliance Status – Ecosure Review
	- searches for whitewash or other signs of roosting or nesting of powerful and masked owls; - stag watching and Anabat survey of hollow bearing trees in each staged extraction area to determine presence of microchiropteran bats; - scat searches and visual inspection for recent koala occupation of all trees proposed for felling; and - elliott trapping surveys for squirrel gliders and brush – tailed phascogale. Any identified species must be appropriately monitored, and clearance obtained prior to commencement of clearing in identified habitat / nesting sites. The results of such surveys would be made available to Office of Environment and Heritage prior to the commencement of clearing operations for each stage. Translocation of Threatened Fauna Where it is proposed to translocate a threatened fauna species, this process shall be undertaken in accordance with Policy of the Translocation of Threatened Fauna in NSW. Staged Rehabilitation Prior to the commencement of works a site rehabilitation plan is to be endorsed by NSW Department of Planning and Environment. This plan should have regard for: - staging of rehabilitation; - retention and reuse of materials from clearing process; - seed banking; use of endemic species; - recovery of any groundwater dependent ecosystems, including swamp sclerophyll forest; - proposed final landforms; and - ongoing monitoring.				
Statement of Commitment 3	Vegetation Management – Offset Site A vegetation management plan shall be prepared for the Offset Site. This Plan shall be endorsed by Office of Environment and Heritage prior to the commencement of clearing on the Salt Ash site. The plan shall give regard to the following: - weed management and monitoring; - management of retained native vegetation and habitat; - feral animal control; - fire management; - public access management; - minimisation of edge effects and fragmentation; - long term monitoring commitments; - details of rehabilitation programs / measures; - measures to ensure conservation in perpetuity; and - funding details of long term financial commitment to any proposed conservation measures.	N/A	There is no evidence of a Vegetation Management Plan for the Offset Site at Tomalla. The DPHI RFI (Appendix 1) requests evidence to support a statement by IEMA that monitoring has been undertaken at the offset site. Monitoring reports for the offset site (Biobanking site 108) are provided as an Appendices of the 2021, 2022 and 2023 Annual Reviews, and include evidence of vegetation and vertebrate pest monitoring. These monitoring reports outline the methods used to undertake monitoring, however these do not address all the points listed under Statement of Commitment 3. A vegetation management plan for the site should be prepared and implemented.	Non-compliant	Non-compliant
Ecology					
Ecology - Statement of Commitment 1	Environmental Offset By 1st February 2015, the required number of biodiversity credits are to be retired. Hollow bearing tree management	Environmental Offset Landscape and Rehabilitation Management Plan (Redisand 2021a) – Section 4.2 Biobanking agreement ID number 108	Environmental Offset The timing trigger is not within the temporal scope of this audit, but it is understood that credits have been retired.	Compliant	Non-compliant

Condition of Consent	Requirement (exact wording)	Evidence reviewed by Ecosure	Findings and Recommendations - Ecosure Review	Compliance Status - IEMA 2024	Compliance Status – Ecosure Review
	To compensate the loss of up to 212 hollow bearing trees identified in the extraction foot print it is proposed to salvage branch hollows (up to 30 cm in diameter) from those existing hollow bearing trees proposed for removal for subsequent re-erection onto host trees which the subject site, such as the buffer zones or retained swamp forest habitat, and / or on adjoining Office of Environment and Heritage estate. Hollows will be placed at least 3 metres from the base of the host tree and in a favourable orientation to minimise exposure. Host trees should be in good health. All salvaged hollows shall be re-erected within twelve (12) weeks from completion of staged clearing operations. Damaged hollows would be repaired (where possible) or replaced with nest boxes. Where required, nest boxes are to be placed in host trees in retained habitats such as buffer zones and retained swamp forest habitat and if possible, in adjoining BCD estate. The re-use of hollows and establishment of nest boxes provides habitat for a range of species including: - brush tailed phascogale; - squirrel gliders; and - microbats. Existing logs and other suitable ground debris salvaged during clearing operations are to be retained in forested habitats within the subject site. The provision ground debris within the site would be expected to provide shelter and nesting habitat for small terrestrial mammals, additional habitat for the Brush – tailed Phascogale and Squirrel Gliders. Cleared trees supporting trunk hollows would provide suitable den sites for quolls. Buffer Zones The following buffer zones / exclusion zones are proposed to be established prior to, and maintained throughout the life of the quarry: - A fifty (50) metre buffer shall be established on both sides of the northern Energy Australia power line. This will create a 130-metre-wide 'exclusion zone (including the 30 metre cleared area); - A fifty (50) metre wide buffer zone is proposed along the site boundary adjoining Office of Environment and Heritage Estate to minimise edge effects; - Remaining site boundaries will be provided with a twenty-metre-wide vegetated buffer; and - A twenty (20) metre wide buffer zone is also proposed between the northern edge of the quarry face and the retained swamp forest habitats on the site. All buffer zones are to be surveyed and marked (flagging tape / plastic mesh fencing) prior to the commencement of clearing works. Buffers will generally be consistent with the figure provided in Appendix B	(NSW OEH 2016). Hollow bearing tree management Landscape and Rehabilitation Management Plan (Redisand 2021a) – Section 6.1 and 6.2 Buffer Zones Landscape and Rehabilitation Management Plan (Redisand 2021a) – Section 6.6.	Hollow bearing tree management There is evidence to demonstrate that hollow bearing trees have been felled inline with the protocol outlined in the Landscape and Rehabilitation Management Plan (including pre-clearing surveys and ecological supervision during clearing). The 2021 Annual review details that 71 nest boxes and 50 hollows salvaged from felled trees were installed to compensate for the loss of 115 hollow bearing trees. No detail was given on the timing or placement of installation. In 2022, eight habitat trees were marked for removal but there is no evidence that hollows were compensated for through either retention of hollow features of installation of nest boxes (Redisand 2023) In 2023, 20 habitat trees were felled, but again there is no evidence of the provision of compensatory habitat. The Landscape and Rehabilitation Management Plan states that a total of 212 nest boxes must be installed, providing a ratio of 1:1 for lost hollow bearing trees. It is not clear how many nest boxes are still in a suitable condition to support fauna as the 2023 monitoring was not completed due to staff safety concerns around access. Furthermore, the 2023 Annual Review suggests that the location of installed nest boxes are not beneficial due to their proximity to available salvaged hollows. It is recommended that future Annual Reviews include a summary of nest boxes and salvaged hollows, their location and condition. Buffer Zones The following non-compliances were recorded in the 2023 Annual Review (Redisand 2024): There have been historical non-compliances regarding buffer zone boundaries and since 2020, Redisand has been consulting with DPHI to modify their original EA so that they can rectify these issues. This consultation is still ongoing. In the meantime, Redisand continues to maintain the area around the buffer zones and report the progress in the Annual Reviews. The DPHI RFI (Appendix 1) requests further evidence that the buffer zones have been maintained to the requirements of this condition, including photographs. No evidence has been sighted by Ecosure to demonstrate that the buffer zones are being adhered to. Discussion should be included in the Annual Reports going forward, including mapping and photographs where appropriate, to demonstrate compliance with the commitment to buffers.		

Revision history

Revision No.	Revision date	Details	Prepared by	Reviewed by	Approved by
00	22/11/2024	PR8943 Salt Ash Sand Quarry Independent Environmental Review	Rachel McBride, Senior Ecologist	Amanda Scott, Aquatic Ecologist	Natalie Toon, Principal Ecologist

Distribution list

Copy #	Date	Type	Issued to	Name
1	22/11/2024	Electronic	The APP Group	Grant Brown
2	22/11/2024	Electronic	Ecosure	Administration

Citation: Ecosure, 2024, *Salt Ash Sand Quarry Independent Environmental Review*, Report to The APP Group. Publication Location – Coffs Harbour

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