Holcim (Australia) Pty Ltd - Teven Quarry Project - Independent Environmental Compliance Audit – Action Plan – April 2020

Condition	Observation	Holcim comments in relation to observation	Audit Reference	Auditors Recommended Action	Holcim comments	Status	Person Responsible	To be completed before
Summary of Non - Compliances - SSD- 6422								
Condition 18 (b), Schedule 2	A copy of the 2018 Division of Resources and Energy (DRE) Standard form was provided but it was not included in the Annual Review.		Corrective action 01	Provide a copy of the DRE standard form in the Annual Review	2020 annual review to include this form.	Accepted	SS/GS	Completed
Condition 4, Schedule 3	The Annual Review summarises the noise monitoring results from Muller Acoustic Consultants which indicate compliance with the relevant criteria. While the monitoring locations appear to surround the quarry, providing a reasonable indication of the noise levels, there is nothing linking the monitoring locations with all the receivers in Table 2 of the consent. Table 6-1 of the Noise Management Plan justifies the noise monitoring locations in relation to the receivers but there is no mention of R13, R15, R16, R17, R18 or R20. The monitoring locations in the Quarterly Noise Monitoring Assessment are similar but not the same as those identified in the Noise Management Plan but there is no justification or link provided to all the receivers in Table 2. The Quarterly Noise Monitoring Assessment concludes that the noise criteria was achieved at all assessed residential receivers, however, because not all receivers mentioned in Table 2 were assessed, it is difficult to confirm if noise levels compiled at all these receivers. It does appear the monitoring is comprehensive, with the exception of R13, with an observed linkage between the results and the receivers in Table 2.	Regarding the review comments around the receivers R13-R18 and R20 as per Table 2 of the Consent. The noise monitoring location align reasonably well with those in the NMP. The receivers R13-18 and R20 are more distant than measurement location N5 and hence, compliance is implied at these if levels are compliant at N5	Corrective action 02	Confirm in the Quarterly Noise Monitoring Assessments, the noise criteria at all receivers in Table 2 was achieved. And/or update the Noise Management Plan to confirm the noise monitoring locations are representative of all the receivers in Table 2.	Finding to be communicated to Muller Acoustic Consultants regarding noise monitoring report. Noise monitoring will also changed from 30 minutes 4 times per year to 1.5 hours 1 time per year for next round. Muller to review monitoring locations to ensure the noise monitoring locations are representative of all the receivers in Table 2. for next round.	Accepted	SS/GS	December 2020.
Condition 10(d), Schedule 3	The Blast Management Plan describes the control measures, monitoring program and protocol for investigating complaints. However it does not include a community notification procedure. It also appears the Blast Management Plan was not submitted to the Secretary within 6 months of the consent but this is considered to be outside the audit period. The Blasting Checklist indicates the mitigation measures are implemented	One page fact sheet has been previously provided to local residents. There is a Blast sign on the front gate.	Corrective action 03	Include community notification procedures for the blasting schedule in the Blast Management Plan.	SLR to update Plan. New requirement to be added to plan: if a community member complains regarding blasting or requested to be notified ('sensitive receivers'), the community member will be notified 24 hours prior to any blast for a period of 12 months, unless they request to extend.	Accepted	SS	December 2020.
Condition 11, Schedule 3	According to the Annual Review, the PM10 annual average was below the annual average criteria but the PM10 24 hour criteria was exceeded on 5 occasions during 2018 (11 August, 6 September, 6 November, 10 November and 4 December). The results ranged from 58µg/m3 to 68µg/m3 compared against a criteria of 50 µg/m3. The Annual Review explains there was an issue with the sampling methodology which has since been rectified. The depositional dust results in the Annual Review also indicate some exceedances of the approval criteria, however, it explains	It is noted that no exceedance / non-compliance of the approval limits occurred. It is noted that the approval limits only apply to residential location. It is noted that the high dust levels were not detected at dust sensitive residential locations. The high results were as a result of surround agricultural land use. The high levels were proactively reported to DPIE. DPIE visited the site on the 9.03.2020. It was agreed that the Air Quality management Plan will be	Corrective action 04	Review the dust monitoring program to ensure it provides representative results that can be used to confirm compliance with the relevant criteria and update the Air Quality Management Plan accordingly.	If a incident is detected (i.e a dust result above air quality criteria in the Development Consent at any residence on privately-owned land.) this will be reported to DPIE within 7 days. It is noted that Holcim proactively notified the local residents regarding the recent high levels detected in the surrounding agricultural locations. Holcim will continue to notified the landowners as required as soon as practicable.	Accepted	SS /ES /GS	December 2020.

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	the exceedances were due to sugar farming operations that surround the monitoring locations. Holcim are in discussion with DPIE and EPA regarding the relocation of the dust deposition gauges.	updated.			Holcim will update the site's air quality management plan to only undertake dust deposition monitoring at sensitive receptors in the event of a complaint. Proactive due diligence monitoring will continue on site at a non dust sensitive receptors for internal business management purpose. It is noted that the timeframe will be dependant on the departments approval of the revised management plan.			
Condition 15, Schedule 3	The Annual Review reported a non-compliance with this condition due to a faulty weather station. However, a meteorological station was observed, which Holcim advised was installed by VGT. Although considered a non-compliance, the issue has since been addressed.	Ramboll fixed the weather station in Feb 2020.	Corrective action 05	Regularly maintain and monitor the weather station to ensure it is working.	The weather station will be upgraded to 3G capabilities to allow data to be remotely downloaded	No further action	ES	Closed
Condition 20, Schedule 3	The Water Management Plan includes a water balance, management system and monitoring program, however, it does not include: • Evidence the author was approved by the Secretary • Approved within 6 months • Detailed baseline data • Erosion and sediment controls Although it appears the Water Management Plan was not submitted to the Secretary within 6 months of the consent this is considered to be outside the audit period. In relation to erosion and sediment controls, the basin management is discussed but there are no other erosion and sediment controls mentioned. Controls on site and the Annual Review indicate the water management and monitoring is implemented and effective.		Corrective action 06	Update the Water Management Plan to include all the information required by Condition 20, Schedule 3. • Detailed baseline data • Erosion and sediment controls	Liaise with SLR regarding finding. SLR to include all the information required by Condition 20, Schedule 3. • Detailed baseline data • Erosion and sediment controls The water management plan figure will also be updated to reflect the updated EPL location description Copy to be uploaded on the Holcim website after the approval.	Accepted	SS	December 2020.
Condition 23, Schedule 3	The delivery dockets show the date and time trucks arrive and leave the site. Monthly truck movements are included in the Annual Review. A summary is also on the website for 2016 and 2017 but it does not appear to be updated every 6 months.	It is noted that the truck movement are included in the 2017, 2018 & 2019 annual review report. 2019 report to be uploaded shortly pending review and approval by DPIE	Corrective action 07	Publish a summary of truck movements on the website every 6 months.	Site to add requirement to site planner Site to upload data directly every 6 months from July 2020 Site to upload hisotrical 6 monthly data for the last 3 years	Accepted	GS	July 2020
Condition 30, Schedule 3	Holcim was not able to provide any evidence a bond had been lodged with the Department. Holcim was also not able to confirm when the Biodiversity and Rehabilitation Management Plan (EMM 2016) was approved, however, as it was prepared in		Corrective action 08	Lodge a Conservation and Rehabilitation Bond with the Department, in accordance with	Working with Surveyor, Ecologist and Consultant for the Biodiversity Calculation.	Accepted	SS / ES	June 2021

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	2016, it is assumed the Plan has been approved for more than 6 months, so the bond is required.			Condition 30, Schedule 3.				
Condition 31, Schedule 3	Holcim was not able to provide any evidence the Conservation and Rehabilitation Bond had been reviewed following the previous Independent Environmental Audit.		Corrective action 09	Review the Conservation and Rehabilitation Bond following the Independent Environmental Audit.	See Corrective action 08	Accepted	See Corrective action 08	See Corrective action 08
Condition 33, Schedule 3	Ballina Shire Council have indicated there is not a current Approval to Operate the on site sewage treatment and disposal system. Holcim advised the system has been in place since they started operating the quarry. Waste segregation was observed on site, with waste chemicals and oils stored appropriately under cover and bunded. Waste invoices indicate waste is handled and disposed appropriately. Waste management is discussed in the Annual Review		Corrective action 10	Obtain confirmation from EPA and Council indicating they are satisfied with the on site sewage treatment and disposal system.	Liaise with council to lodge an application to obtain the relevant approvals as required. Council's OSSM Officers note that they can assist the owner / operator in ensuring the OSSM is operating correctly to obtain the relevant approvals and required servicing reports.	Accepted	Victoria Musgrove	June 2021
Condition 1, Schedule 4	Exceedances of the air quality criteria were recorded but Holcim advised landowners were not notified. It was claimed that the air quality exceedances were not due to Holcim activities but there is nothing in the condition indicating it is only quarry related exceedance that are to be notified.	It is noted that no exceedance / non-compliance of the approval limits occurred. It is noted that the approval limits only apply to residential location. It is noted that the high dust levels were not detected at dust sensitive residential locations. The high results were as a result of surround agricultural land use. The high levels were proactively reported to DPIE. DPIE visited the site on the 9.03.2020. It was agreed that the Air Quality management Plan will be updated.	Corrective action 11	Notify affected landowners when monitoring results indicate an exceedance of the relevant criteria with justification why the exceedance was not associated with Holcim activities, if applicable.	It is noted that Holcim proactively notified the local residents regarding the recent high levels detected in the surrounding agricultural locations. Holcim will continue to notified the landowners as required as soon as practicable. Holcim will update the site's air quality management plan to only undertake dust deposition monitoring at sensitive receptors in the event of a complaint. Proactive due diligence monitoring will continue on site at a non dust sensitive receptors for internal business management purpose. It is noted that the timeframe will be dependant on the departments approval of the revised management plan.	Ongoing	See Corrective action 04	See Corrective action 04
Condition 2, Schedule 5	The management plans all provide: □ Baseline data (except the Water Management Plan) □ A description of the relevant statutory requirements, performance measures/criteria and indicators □ Management measures Monitoring program □ Protocols for managing and reporting on incidents, complaints, non-compliances and exceedances □ Review and improvement protocol None of the plans included a contingency plan to manage unpredicted impacts.		Corrective action 12	Update the management plans required under the consent to include a contingency plan to manage unpredicted impacts.	Environmental Management Strategy included contingency plans.	No further action required	-	-
Condition 3, Schedule 5	5 Exceedances of the air quality criteria were recorded but Holcim	It is noted that no exceedance / non-compliance of the approval limits	Corrective action 13	Notify the Secretary, in accordance with	If a incident is detected (i.e a dust result above air quality criteria in the	Ongoing	See Corrective	See Corrective

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	advised that the Secretary was not notified. It was claimed that the air quality exceedances were not due to Holcim activities but there is nothing in the condition indicating it is only quarry related exceedance that are to be notified.	occurred. It is noted that the approval limits only apply to residential location. It is noted that the high dust levels were not detected at dust sensitive residential locations. The high results were as a result of surround agricultural land use. The high levels were proactively reported to DPIE. DPIE visited the site on the 9.03.2020. It was agreed that the Air Quality management Plan will be updated.		Condition 3, Schedule 5, when monitoring results indicate an exceedance of the relevant criteria and, when relevant, document justification why the exceedance was not associated with Holcim activities.	Development Consent at any residence on privately-owned land.) this will be reported to DPIE within 7 days. It is noted that Holcim proactively notified the local residents regarding the recent high levels detected in the surrounding agricultural locations. Holcim will continue to notified the landowners as required as soon as practicable. Holcim will update the site's air quality management plan to only undertake dust deposition monitoring at sensitive receptors in the event of a complaint. Proactive due diligence monitoring will continue on site at a non dust sensitive receptors for internal business management purpose. It is noted that the timeframe will be dependant on the departments approval of the revised management plan.		action 04	action 04
Condition 5, Schedule 5	Holcim was not able to provide any evidence there had been a review of the strategies, plans and programs required under this consent, following any of the triggers.	SLR was engaged in Q3 2019 to review and update the site management plans. Site has been awaiting the findings of the independent audit , before finalising the review and update of the management plans	Corrective action 14	Review the strategies, plans and programs following the annual review, incident report, audit report or modification and maintain evidence of the reviews.	SLR was engaged in Q3 2019 to review and update the site management plans. Site has been awaiting the findings of the independent audit, before finalising the review and update of the management plans. This will be completed once the department acceptance the findings of the independent audit.	Accepted	SS /ES /GS	December 2020.
Condition 7, Schedule 5	The Annual Review identifies two Incidents/Non compliances. Holcim advised that the Secretary was not notified other than inclusion in the Annual Review.	Duplicate finding. This is in relation to dust monitoring (corrective action 4 & 13) and weather station (corrective actions 5)	Corrective action 15	Notify the Secretary and any other relevant agencies of any incident, within 7 days of the date of the incident, in accordance with Condition 7, Schedule 5.	<u>Dust monitoring</u> If a incident is detected (i.e a dust result above air quality criteria in the Development Consent at any residence on privately-owned land.) this will be reported to DPIE within 7 days. It is noted that Holcim proactively notified the local residents regarding the recent high levels detected in the surrounding agricultural locations.	Ongoing	Duplicate finding. This is in relation to dust monitoring (corrective action 4 & 13) and weather station (corrective	Duplicate finding. This is in relation to dust monitoring (corrective action 4 & 13) and weather station

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					Holcim will continue to notified the landowners as required as soon as practicable. Holcim will update the site's air quality management plan to only undertake dust deposition monitoring at sensitive receptors in the event of a complaint. Proactive due diligence monitoring will continue on site at a non dust sensitive receptors for internal business management purpose. It is noted that the timeframe will be dependant on the departments approval of the revised management plan. <u>Weather Station</u> The weather station will be upgraded to 3G capabilities to allow data to be remotely downloaded		actions 5)	(corrective actions 5)
Condition 8, Schedule 5	Truck movement data, complaints register and Annual Reviews are provided on the website, however the most recent truck monitoring data was from 2017, complaints register was 2018 and Annual Review 2017. No noise, dust or water monitoring was on the website at the time of the audit.	Complaint Register is updated and available online. It is noted that the truck movement are included in the 2017, 2018 & 2019 annual review report. 2019 report to be uploaded shortly pending review and approval by DPIE. It is noted that the summary of the Monitoring (noise, dust and water) data is now available online.	Corrective action 16	Regularly update the website with the environmental performance of the development, in accordance with Condition 8, Schedule 5.	- Site to add requirement to site planner - Site to upload data directly every 6 months	See corrective actions 07	See corrective actions 07	See corrective actions 07
Condition 9, Schedule 5	The appointment of GHD was endorsed by the Secretary on 12 August 2019. The audit involved consultation with the agencies and assessment of the environmental performance and compliance of the project. It also reviews the adequacy of any strategy/plan/program and recommends actions to improve the environmental performance. The Applicant had not commissioned and paid the full costs of an Independent Environmental Audit by the anniversary date of the consent.	It is noted that the delay was caused due to waiting for the approval from the secretary. The auditor is not able to be engaged until approval is provided	Corrective action 17	When the Independent Environmental Audit is required, commission and pay the full costs of the audit by the anniversary date of the consent.		no further action required		

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Condition 11, Schedule 5	The website contains some of the information required but is missing: Statement of commitments Comprehensive summary of monitoring results An updated complaints register (last updated quarter 1 2018) The 2018 and 2019 Annual Review The last Independent Environmental Compliance Audit was provided but Holcim response was not..	Complaint Register is updated and available online. It is noted that the truck movement are included in the 2017, 2018 & 2019 annual review report. 2019 report to be uploaded shortly pending review and approval by DPIE. It is noted that the summary of the Monitoring (noise, dust and water) data is now available online.	Corrective action 18	Update the website to include all the information required by Condition 11, Schedule 5.	Holcim to request copy of Statement of Commitments and Response to previous independent audit from DPIE Holcim comment from Corrective actions 7: - Site to add requirement to site planner - Site to upload data directly every 6 months	Accepted	SS / GS	Ongoing
Summary of recommendations - SSD- 6422								
Condition 7, Schedule 2	The survey indicated the quarry floor was above the RL of 4 metres AHD. Holcim reported the datum peg observed was placed on the floor of the quarry during this survey. The quarry floor appeared to be above this datum.		Recommendation 01:	To confirm the floor height, it is recommended that an annual survey is undertaken.	Survey Peg RL 4.20 on floor	no further action required		
Summary of Non - Compliances - EPL - 3293								
M 1.3	Review of the Annual Review indicated the date and monitoring location of the sample but not the time or person who collected the sample.		Corrective action 19	Record all the information required by M1.3 of the EPL, when collecting samples.	Site water monitoring records have location, time, name etc ,started from 5/7/2018. These lab records can be provided at any time	Not accepted - Please see Holcim comments		
M4.2	Records of complaints received during the audit period did not contain: Time of the complaint The method by which the complaint was made Personal details		Corrective action 20	Update complaint handling procedures so all information required by Condition M4.2 is recorded.	It is noted that the auditor reviewed the complaint data available on Holcim's website. It is noted that these details on published on web version. These details are recorded in Holcim INX database and can be provided at any time .	Not accepted - Please see Holcim comments		
M6.1	The Quarterly Noise Monitoring Assessment indicates the noise monitoring was done for a period of 15 minutes, rather than the 1.5 hours required.	Noted that Noise Monitoring was undertaken 4 times a year for 30 mins each.	Corrective action 21	Undertake noise monitoring for 1.5 hours, once a year, in accordance with EPL condition M6.1.	Finding to be communicated to Muller Acoustic Consultants regarding noise monitoring report. Noise monitoring will also changed from 30 minutes 4 times per year to 1.5 hours 1 time per year for next round. Muller to review monitoring locations	Accepted	See corrective actions 2	See corrective actions 2

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					to ensure the noise monitoring locations are representative of all the receivers in Table 2. for next round.			
P1.2	Based on the description and site observations, Holcim has been monitoring at the EPL location. This location differed from the location of the licenced discharge point nominated in the Water Management Plan (WMP) – Figure 3.1 and Section 6.0. The Annual Review reports the EPA have requested additional sampling to be undertaken at the site.	Water Quality Management to be updated to reflect the EPL Location.	Recommendation 02	Clarify with the EPA the monitoring locations and, if necessary, obtain an EPL variation and update the Water Management Plan so they are consistent with the current monitoring requirements	Liaise with SLR regarding finding. SLR to include all the information required by Condition 20, Schedule 3. • Detailed baseline data • Erosion and sediment controls The water management plan figure will also be updated to reflect the updated EPL location description Copy to be uploaded on the Holcim website after the approval.	Accepted	See corrective actions 6	See corrective actions 6
L4.4	The Blasting Checklist has a requirement to place a blast warning sign at the front entrance and notify neighbour of a blast as early as possible, which has been signed, indicating it is done. However, it was not possible to determine if neighbours were given at least 24 hours notice.	One page fact sheet has been previously provided to local residents. There is a Blast sign on the front gate.	Recommendation 03	Update the Blasting Checklist to include reference that all sensitive receivers are to be given at least 24 hours notice.	SLR to update Plan. New requirement to be added to plan: if a community member complains regarding blasting or requested to be notified ('sensitive receivers'), the community member will be notified 24 hours prior to any blast for a period of 12 months, unless they request to extend.	Accepted	See corrective actions 03	See corrective actions 03
O4.1	The Water Management Plan mentions the use and maintenance of diversion drains, however there is no plan showing their location. Diversion drains were observed on site.	It is noted that the condition O4.1 of the EPL requires that 'the licensee must maximise the diversion of run-on waters from lands upslope and around the site whilst land disturbance activities are being undertaken'. This condition of the EPL, does not require the Water Management Plan figure to show the locations of clean water bunds.	Recommendation 04	To clarify the location of diversion drains and erosion control measures, it is recommended a staged sediment and erosion control plan be prepared and included in the Water Management Plan.	Liaise with SLR regarding finding. SLR to include all the information required by Condition 20, Schedule 3. • Detailed baseline data • Erosion and sediment controls The water management plan figure will also be updated to reflect the updated EPL location description Update Water Management Plan figure to show diversion bunds. Copy to be uploaded on the Holcim website after the approval.	Accepted	See corrective actions 06	See corrective actions 06
O 4.4	Holcim reported a marker in the dam indicates the design storage capacity of the Main Dam and the water level is restored to this level within 5 days of rainfall events. However, it was difficult to confirm compliance with this condition with the records available.		Recommendation 05	To confirm the design capacity in the Main Dam is restored within 5 days of rainfall, it is recommended that this is recorded	Marker in Dam indicating level and point at which water discharges. Main dam is not the main rainfall collection dam rather it is a dam for plant and dust control, water also recycled from plant. Top up as required. Capacity in Mgt Plan.	Not accepted - Please see Holcim comments		
Summary of Non - Compliances - Management Plans								
Noise Management Plan	The quarry was not expected to cause significant noise related impacts on sensitive receivers, so other than the placement of	Refer to Corrective action 02 and Corrective action 21	Refer to Corrective	Confirm in the Quarterly Noise Monitoring	Refer to Corrective action 02 and Corrective action 21	Refer to Corrective	Refer to Corrective	Refer to Corrective

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(NMP)	stockpiles along the northern edge of the project and regular maintenance of machinery, minimal noise mitigation practices were observed. The noise monitoring indicates compliance with the relevant criteria but does not assess all the residential receivers. The monitoring is not in accordance with the EPL requirements.		action 02 and Corrective action 21	Assessments, the noise criteria at all receivers in Table 2 was achieved. And/or update the Noise Management Plan to confirm the noise monitoring locations are representative of all the receivers in Table 2		action 02 and Corrective action 21	action 02 and Corrective action 21	action 02 and Corrective action 21
Blast Management Plan (BMP)	Blast monitoring results are reported in the Annual Review and are publically available on the Holcim website. No exceedances were recorded during the 2018 reporting period. Teven Quarry provides verbal notification to neighbouring properties prior to undertaking blasting, with a message left and a follow-up call made if the resident is unable to be reached. While Teven Quarry has indicated verbal notification is provided to neighbouring properties prior to undertaking blasting, the BMP does not provide detail in relation to community notification procedures for the blasting schedule in accordance with Condition 10(d) of Schedule 3 of SSD-6422.	Duplicate finding . See response for Condition 10 (d), Schedule 3 above	Refer to Corrective action 03 and Recommendation 03	Include community notification procedures for the blasting schedule in the Blast Management Plan Update the Blasting Checklist to include reference that all sensitive receivers are to be given at least 24 hours notice.	Refer to Corrective action 03 and Recommendation 03	Refer to Corrective action 03 and Recommendation 03	Refer to Corrective action 03 and Recommendation 03	Refer to Corrective action 03 and Recommendation 03
Air Quality Management Plan (AQMP)	Dust management was observed during the site visit, including an irrigation system on haulage roads and a sprinkler system on conveyor belts. The Annual Review indicates five exceedances of the PM10 24 hour criteria. A number of exceedances were also recorded for the depositional dust at DDG1 and DDG2, however, Holcim report this was due to contamination and have therefore been removed from the annual average. The Annual Review mentions the depositional dust gauges are poorly located and Holcim are in discussions with DPIE and EPA regarding moving them and updating the AQMP accordingly	Refer to Corrective action 04	Refer to Corrective action 04	Review the dust monitoring program to ensure it provides representative results that can be used to confirm compliance with the relevant criteria and update the Air Quality Management Plan accordingly.	Refer to Corrective action 04	Refer to Corrective action 04	Refer to Corrective action 04	Refer to Corrective action 04
Water Management Plan (WMP)	The Water Management Plan includes a water balance, management system and monitoring program, however, it does not include: • Evidence the author was approved by the Secretary • Approved within 6 months • Detailed baseline data • Erosion and sediment controls Although it appears the Water Management Plan was not submitted to the Secretary within 6 months of the consent this is considered to be outside the audit period. In relation to erosion and sediment controls, the basin management is discussed but there are no other erosion and sediment controls mentioned. Controls on site and the Annual Review indicate the water management and monitoring is implemented and effective.	Refer to Corrective action 06, 12 and 19 and Recommendation 02, 04 and 05	Refer to Corrective action 06, 12 and 19 and Recommendation 02, 04 and 05	Update the Water Management Plan to include all the information required by Condition 20, Schedule 3. • Detailed baseline data • Erosion and sediment controls	Refer to Corrective action 06, 12 and 19 and Recommendation 02, 04 and 05	Refer to Corrective action 06, 12 and 19 and Recommendation 02, 04 and 05	Refer to Corrective action 06, 12 and 19 and Recommendation 02, 04 and 05	Refer to Corrective action 06, 12 and 19 and Recommendation 02, 04 and 05

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Biodiversity and Rehabilitation Management Plan (BRMP)	The 2018 Annual Review indicated that there had not been any rehabilitation at the quarry during the reporting period. However, weed spraying was undertaken. The BRMP appears to provide comprehensive guidance on the rehabilitation to occur but currently the quarry is active, so there is little opportunity for implementation.	Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.	Not applicable.