



Independent Audit Report

BLAKEBROOK QUARRY – MP07-0020

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Authorisation

Author name:	David McLean
Position:	Lead Environmental Auditor
Signature:	
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Prepared for:

Lismore City Council
43 Oliver Avenue
Goonellabah NSW 2478

Prepared by:

McLean Strategic Solutions Pty Ltd
Ballina, Northern Rivers

w. mcleanstrategicsolutions.com.au

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EXECUTIVE SUMMARY

This Independent Environmental Audit was commissioned by Lismore City Council (LCC) to assess compliance with the Conditions of Approval (CoA) for Blakebrook Quarry, located in the Northern Rivers region of New South Wales. The audit was conducted in accordance with Schedule 5, Condition 12 of Project Approval 07_0020 and covers the three-year period from January 2022 to December 2024 and includes observations from site inspection and verification in May 2025.

The audit was led by David McLean, with a site inspection conducted on the 19th of May 2025. The scope included a detailed review of compliance with Project Approval conditions, the Environmental Protection Licence 3384, and other relevant statutory obligations. The audit also assessed implementation of key environmental management plans and commitments outlined in Annual Environmental Management Reviews (AEMRs).

The audit identified a high level of compliance across the majority of conditions. A total of 74 conditions were assessed, with:

- 59 conditions rated as Compliant
- 5 as Non-Compliant
- 10 as Not Triggered

Several non-compliances were noted in relation to Terms of Approval, Notification to Landowners and Soil and Water Management. A number of these were identified in Annual Environmental Management Reviews during the audit period, which have been notified to DPHI, actions taken and matters subsequently closed out. These non-conformances are required to be included within the audit report in accordance with the NSW Independent Environmental Audit Guidelines.

The audit found that LCC has continued to implement its environmental management framework and respond to compliance issues when identified. The general operation of the site appears to be effectively managed in accordance with compliance requirements for the facility, with few complaints or issues identified.

This report provides a consolidated register of audit findings and recommended actions to support continuous improvement. Of note there has been considerable additional information obtained for the project over the audit period from what was considered in the originally approved management plans. There are a number of recommendations associated with addressing these based on the current available information for the project and on the review undertaken by the auditor as a response to the consultation completed for the project.

1 INTRODUCTION

1.1 Project overview

The Blakebrook Quarry is operated by Northern Rivers Quarry (NRQ) which is a commercial entity controlled by Lismore City Council (The Proponent). The quarry is located at 550 Nimbin Road Blakebrook NSW 2480, approximately 7 kilometres northwest of Lismore on Lot 53 DP 1254990 and Lot 54 DP 1254990. (See Figure 1).

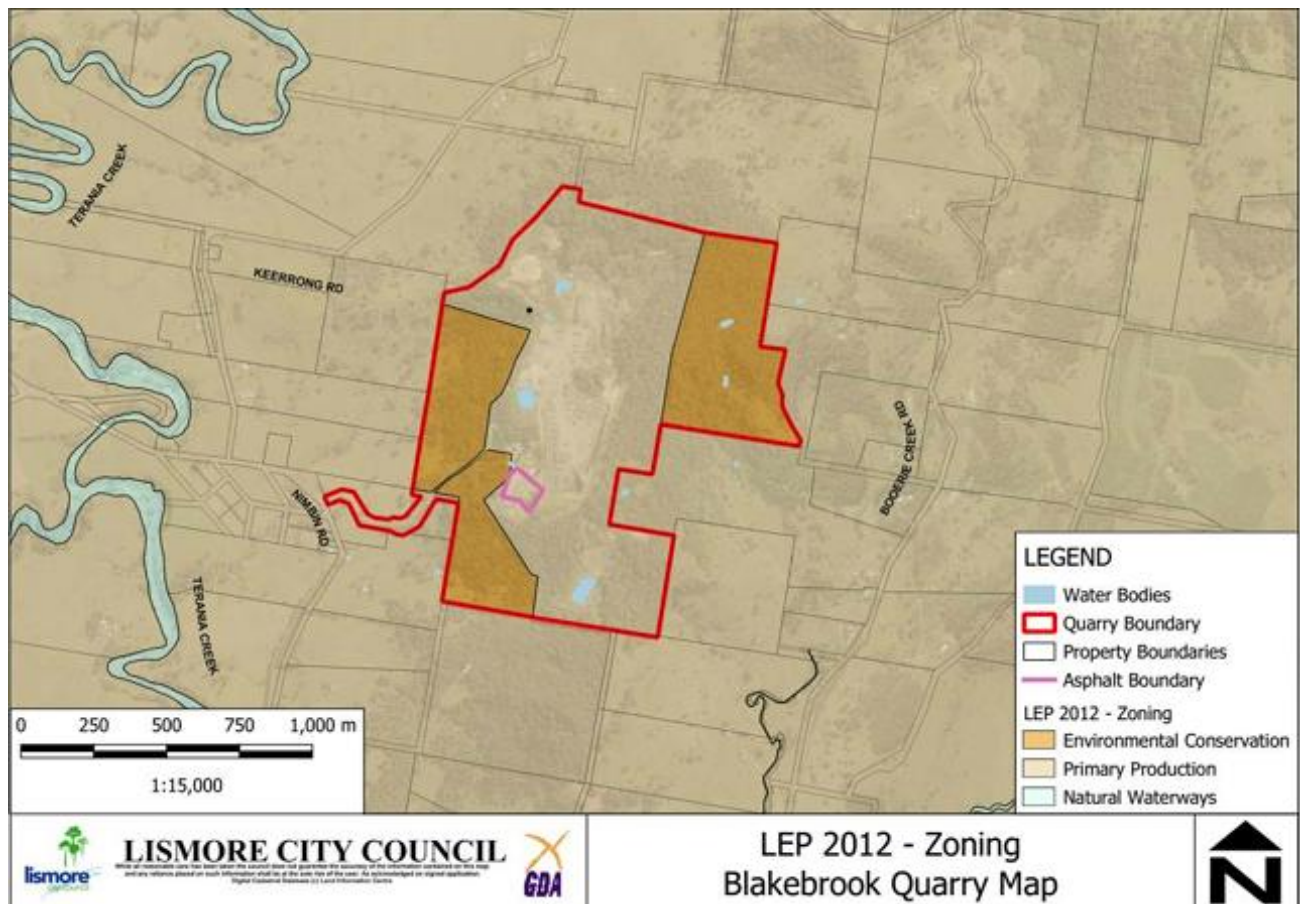


Figure 1: LEP 2012 Zoning Blakebrook Quarry Map

The Blakebrook Quarry is identified as a State Significant Development (SSD). It produces a range of quarry products supplying to Northern NSW, including aggregate, drainage rock, road base, basalt, metal dust, fill material, and select fill. A mobile asphalt plant remains located in the southwestern portion of the quarry footprint and is operated by RPQ Asphalt Pty Ltd a part of Downer Group Pty Ltd approved under the Quarry Mod 3 approval. This asphalt plant is currently being replaced with a new mobile plant.

Surrounding land use remains predominantly rural and agricultural, including cattle and horse grazing, pasture production, and horticulture, with land zoned RU1 Primary Production under the Lismore Local Environmental Plan (LEP). The area covered by the approval includes bush regeneration areas and offsets as part of the SSD approval.

There are eight sensitive receivers located in proximity to the quarry, with the closest dwelling approximately 650m to the southwest of the quarry. The Access to the site is via a sealed access road from

Nimbin Road. The total area of the site is 128 hectares, with a portion of the site provided for the asphalt plant at Lot 54 DP1254990.

The Project Approval (Application Number 07_0020) was granted on 24 November 2009. Since that time, the project has undergone two modifications relevant to the project with Modification 1 (approved 18 September 2017) and Modification 3 (approved 20 July 2021) forming the basis for the assessment of compliance. The development application held by Council has been surrendered and the latter, of which permits the operation of a mobile asphalt plant within the quarry footprint. The limits imposed by Conditions of Approval (CoA) on Modification 3 are as follows:

- 1) The Proponent may carry out quarrying operations and Asphalt plant operations on the site until 31 December 2039.

Note: Under this approval, the Proponent is required to rehabilitate the site and carry out additional requirements and undertakings to the satisfaction of the Secretary. Consequently, this approval will continue to apply in all respects other than the right to conduct quarrying operations until the rehabilitation of the site and those requirements and undertakings have been carried out to the standard required by the applicable conditions.

- 2) The Proponent must not undertake quarrying operations below 55 m AHD in the northern pit or 105m AHD in the southern pit. Note: Drainage sumps may be constructed below this level with the agreement of the Secretary.
- 3) The Proponent must not:
 - a) transport more than 600,000 tonnes of quarry products from the site per calendar year
 - b) transport more than 50,000 tonnes of asphalt from the site per calendar year
 - c) dispatch more than 150 laden trucks from the site on any calendar day

1.2 Auditor approval requirements

CoA 12 and 13 – Schedule 4 of MP07-0020 set out the requirements for undertaking Independent Audits. In accordance with Schedule 5, CoA 12 (a), Independent Audits are to be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary.

On 29 April 2025, the NSW Department of Planning, Housing and Infrastructure (DPHI) endorsed David McLean as the Lead Auditor for the Independent Environmental Audit of Blakebrook Quarry. The letter of approval is provided in Appendix B.

1.3 The audit objectives

The objective of this Independent Audit is to satisfy MP07-0020 Schedule 5 CoAs 12 and 13:

- 12) *Within three years of the date of grant of this project approval, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission, commence and pay the full cost of an Independent Environmental Audit of the project. This audit must:*
 - (a) *be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary;*

- (b) include consultation with the relevant agencies and the CCC;*
- (c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL or necessary water licences for the project (including any assessment, strategy, plan or program required under these approvals);*
- (d) review the adequacy of strategies, plans or programs required under the above mentioned approvals;*
- (e) recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, strategy, plan or program required under the above mentioned approvals; and*
- (f) be conducted and reported to the satisfaction of the Secretary.*

13 *Within 12 weeks of commencing this audit, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.*

1.4 Audit scope

The audit covers the following scope:

- Review of the Project documentation and records from January 2022 to December 2024 (the audit period) (as provided under the RFQ for the project).
- Site inspection and interview with key personnel during the audit in May 2025.
- Review of Project performance against MP07-0020 CoA and Environmental Protection Licence (EPL) (by reviewing the annual environmental monitoring reports submitted in 2022, 2023 and 2024).
- Details of the Audit Report to be submitted to DPHI within 12 weeks from site inspection; and
- Consultation with stakeholders DPHI, Environment Protection Agency (EPA) and Community Consultative Committee (CCC) and landowners where monitoring stations are located.
 - DPHI requested the following key issues should be addressed in the audit:
 - A review of surface water and dust monitoring locations, considering the effects of local traffic on gravel roads, interactions with cattle and birds, and recommendations for potential improvements in placement or design
 - A review of the implementation of weed management measures across the quarry and a recommendation for any improvements
 - A review of dust management at the quarry
 - A review of the asphalt plant Out of Hours Works Protocol process with a focus on the administrative aspects including but not limited to the timeline of campaigns.
 - The Chairperson of the CCC requested the audit:
 - In the operation of the quarry, making sure their compliance monitoring is correct and fit for purpose
 - Conflicts between separate legal requirements for DPHI and EPL. Trying to resolve inconsistencies and requirements between both sets of obligations.
 - The Environmental Protection Agency requested the audit:
 - Assess suitability of monitoring points for water quality monitoring (Surface and Groundwater) and their location

- Review groundwater monitoring regarding elevated levels recorded in groundwater.
- Landowners requested that the audit:
 - Review reports that doors and windows noticeably rattle and shake during blasting and assess the possibility or risk of long-term structural damage to the receiver
 - Review dust risks from the quarry entering drinking water at the receiver
 - Odour from the asphalt plant at night during operations from the facility.

2 AUDIT METHODOLOGY

2.1 Audit process

The Independent Audit (IA) was conducted in a manner consistent with AS/NZS ISO 19011.2019 – Guidelines for Auditing Management Systems and the methodology set out in the DPHI’s Independent Post Approval Requirements (IAPAR 2020).

2.1.1 Audit initiation and scope development

Prior to the commencement of the audit the following tasks were completed:

- Establish initial contact with the auditee
- Confirm the audit purpose, scope and criteria
- Consultation with stakeholders (Sensitive receivers, CCC representative, EPA and DPHI representatives).

McLean Strategic Solutions (MSS) consulted with LCC, DPHI, the CCC representative, key stakeholders (EPA) and landholders in the vicinity of the Quarry to discuss Post Approval Requirements and expectations prior to the commencement of the audit. The scope of the audit was discussed during the consultation. The consultation records are summarised within this report.

The auditor made effort to contact a number of sensitive receivers as part of the consultation process. The sensitive receivers that were able to be contacted are included in Table 1 with a summary of the key issues and areas of focus.

Table 1: Key Issues and Areas of Focus

Stakeholder	Issues and Focus	How Addressed
DPHI	• A review of surface water and dust monitoring locations, considering the effects of local traffic on gravel roads, interactions with cattle and birds, and recommendations for potential improvements in placement or design. • A review of the implementation of weed management measures across the quarry and a recommendation for any improvements. • A review of dust management at the quarry. • A review of the asphalt plant Out of Hours Works Protocol process with a focus on the administrative	Refer to Section 3

Stakeholder	Issues and Focus	How Addressed
	aspects including but not limited to the timeline of campaigns.	
Community Consultative Committee	- In the operation of the quarry, making sure their compliance monitoring is correct and fit for purpose. - Conflicts between separate legal requirements for DPHI and EPL. Trying to resolve inconsistencies and requirements between both sets of obligations.	Refer to Section 3
Sensitive Receivers (4 and 5)	- Landholder advised that blasting operations cause doors and windows at sensitive receiver 4 and 5 on Booerie Creek Road to rattle and shake, raising the possibility of long-term structural impact. - Noise levels during night operations are noticeable and have progressively increased since night operations were approved. Levels are at times significant, particularly along the northern boundary of Blakebrook Quarry. - Dust and particulate matter are frequently observed on the roofs of [REDACTED] Booerie Creek Road, raising concerns about potential entry into potable water systems and implications for long-term water quality. - Odours resembling diesel or asphalt products are frequently present in the air, particularly during night operations when air density is higher and movement is limited. These emissions have raised concerns regarding potential ongoing health impacts associated with quarry activities.	Refer to Section 3
Sensitive Receivers (8)	No concerns or issues, some noise for night works. But has not been a real issue, quarry is responsive to issues for the out of hours. The Surfacing Manager for the asphalt plant is responsive to any concerns raised.	Refer to Section 3
Environmental Protection Agency	- Need to assess the suitability of the locations of the monitoring points for Water Quality. - They have some elevated TSS or nitrogen in their water quality testing. Groundwater monitoring. - EPA requested a review of the monitoring locations specifically for water quality and groundwater.	Refer to Section 3

2.2 Preparing audit activities

The Auditor performed a document review, prepared an audit plan, and prepared audit documents in preparation for the IEA.

2.3 Site personnel involvement

2.3.1 Meetings

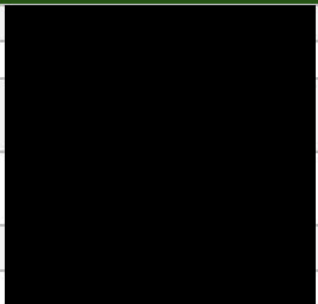
The opening meeting was held with the Auditor and project personnel on 19 May 2025. During the opening meeting the objectives and scope of the IEA, the resources required and methodology to be applied were discussed. The closing meeting was held on 4 June 2025.

2.3.2 Interviews

The Auditor conducted interviews during the site inspection with key personnel (Table 2) involved in project delivery, including those with responsibility for environmental management, to assist with verifying the compliance status of the development.

The names of personnel interviewed during the audit are provided in Table 2.

Table 2: Name and position of personnel interviewed during site inspection

Name	Role	Organisation	Session
	Compliance Coordinator	LCC	Day
	Quarry Production Team Leader / Operator	LCC	Day
	Surfacing Manager	Downer Group Pty Ltd	Day
	Quarry Manager / Quarry Operations Coordinator	LCC	Day
	Compliance Officer	LCC	Day
	Bush Regen Manager	Roots Down Pty Ltd	Phone interview

2.3.3 Site inspection

The site inspection and audit took place on 19 May 2025. Review of the implementation of environmental measures were conducted during this time. Photos taken during the inspection are presented in Appendix D.

2.3.4 Document review

The IEA included investigation and review of Project files, records and documentation that acts as evidence of compliance (or otherwise) with a compliance requirement. The documents sighted are summarised below and were reviewed prior to the site visit are as follows:

- *DPE Major Projects Approval 07_0020 Mod 3 (2021)*
- *EPA Licence 3384 (March 2023)*
- *Blakebrook Quarry Pollution Incident Response Management Plan (2025)*
- *Air Quality Management Plan v4.2 – Blakebrook Quarry September 2023*
- *Noise and Blast Management Plan v4.1 - Blakebrook Quarry September 2022*
- *Aboriginal Heritage Management Plan v4.2 - Blakebrook Quarry August 2023*

- *Operational Traffic Management Plan v4.2 - Blakebrook Quarry February 2024*
- *Environmental Management Strategy v4.3 - Blakebrook Quarry January 2024*
- *Biodiversity and Rehabilitation Management Plan V4.1 – Blakebrook Quarry March 2019*
- *Soil and Water Management Plan - Blakebrook Quarry February 2019*
- *Blakebrook Quarry Biodiversity Offset Strategy July 2019*
- *Annual Environmental Monitoring Report 2022*
- *Annual Environmental Monitoring Report 2023*
- *Annual Environmental Monitoring Report 2024*
- *Blakebrook Quarry Blast Reports 2022*
- *Blakebrook Quarry Blast Reports 2023*
- *Blakebrook Quarry Noise Monitoring Summary Results November 2022*
- *Blakebrook Quarry Noise Monitoring Summary Results December 2023*
- *Blakebrook Quarry Noise Monitoring Summary Results December 2024*
- *Blakebrook Quarry Dust Monitoring Summary Results 2022*
- *Blakebrook Quarry Dust Monitoring Summary Results 2023*
- *Blakebrook Quarry Dust Monitoring Summary Results 2024*
- *Three yearly Independent Audit Report - 2022*
- *Blakebrook Quarry Ground Water Analysis Results 2022*
- *Blakebrook Quarry Surface Water Analysis Results 2022*
- *Blakebrook Quarry Ground Water Analysis Results 2023*
- *Blakebrook Quarry Surface Water Analysis Results 2023*
- *Blakebrook Quarry Ground Water Analysis Results 2024*
- *Blakebrook Quarry Surface Water Analysis Results 2024*
- *Blakebrook Quarry Ground Water Analysis Results up to Mar 2025*
- *Blakebrook Quarry Surface Water Analysis Results up to Mar 2025*
- *Blakebrook Quarry – Extraordinary CCC Meeting Minutes (Redacted) 16 February 2023*
- *Community Consultative Committee Guidelines 2023*
- *Community Consultative Committee Meeting Minutes 28 November 2024*
- *Community Consultative Committee Meeting Minutes including Addendum – 30 November 2023*
- *NRQ Community Consultative Committee Meeting Minutes – Revised – 1 December 2022*

An Audit checklist was prepared comprising all conditions from Schedule 2, 3, 4 and 5 of the MP 07_0020 Mod 3 and a selection of mitigation measures from the Environmental Management Strategy and sub-plans. All other records reviewed and presented as evidence of compliance were detailed in the audit table attached as Appendix A.

2.3.5 General audit findings

Independent Audit findings (refer to Section 3 and Appendix A) were based on verifiable evidence. The evidence included:

- Relevant records, documents and reports
- Interviews of relevant site personnel
- Photographs
- Figures and plans; and
- Site inspections of relevant locations, activities and processes.

2.3.6 Compliance evaluation

The Auditor determined the compliance status of each compliance requirement in the Audit Table (Appendix A), using the following descriptors

Table 3: Compliance status descriptors

Status	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.

Observations and notes may also be made to provide context, identify opportunities for improvement, recommendations or highlight positive initiatives. These are discussed in Section 3.

2.3.7 Evaluation of post approval documentation

The Auditor assessed whether post approval documents:

- Have been developed in accordance with the CoAs and all other environmental licences and approvals applicable to the Project (if any) and their content is adequate.
- Have been implemented in accordance with the CoAs and all other environmental licences and approvals applicable to the Project (if any).

The adequacy of post approval documents was determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document; or
- Whether there are any opportunities or recommendations for improvement.

The post approval documentation prepared for the project and approved by the DPHI has subsequently progressed since approval and some of the understanding of the project, the operation and the nature of the impacts are now better understood. This has resulted in additional recommendations related to the quarry. This is discussed in Section 3.

2.3.8 Completing the audit

The Independent Audit Report was distributed to the proponent to check factual matters and for input into actions in response to findings (where relevant). The Auditor retained the right to make findings or recommendations based on the facts presented.

3 AUDIT FINDINGS

3.1 Previous audit findings

The identified findings from the previous audit report have been closed out in accordance with the identified actions. These are summarised in Table 4.

Table 4: Actions undertaken since previous Independent Audit

Condition / Compliance	Audit Ref	Previous Audit Finding & Recommended Action	Action Taken Since Last Audit
Schedule 3 CoA 22 (Non-compliant)	IA4_01	Driver and Visitor Induction did not address: c) Truck cleaning prior to exit. d) Truck signage for identification. Recommended: Update induction to include both items.	It was verified that the Induction was updated to reference cleaning and signage.
Schedule 3 CoA 28 (OFI)	IA4_OFI-01	No evidence that the Biodiversity and Rehabilitation Management Plan was prepared by a qualified expert. Recommended: Ensure documentation of author qualifications is retained.	Qualifications statement now included in updated BRMP.

3.2 Non-compliances, observations and actions from 2025 IEA

Actions and recommendations in response to each of the findings are presented in Section 3, Table 14. Detailed findings against each CoA are presented in Appendix A.

In summary:

Out of the total 74 CoAs assessed (Schedules 2 to 5) the following were noted:

- 59 CoAs were found to be compliant
- 10 CoAs were identified as not triggered
- 5 CoAs were identified as non-compliant
- Management plans are considered to be generally adequate for the works being undertaken noting the additional recommendations provided within this report.
- EPL annual reports (2022-2024) were reviewed to assess the Proponent performance against their license EPL 3384. There was no non-compliance reported against the EPL conditions

3.2.1 Noise and blasting

Blasting events occurred between 1 Jan 2022 to 4 November 2024. During this period there were two exceedances of the criteria. One of these was recorded at Nimbin Road on 26 September 2022 with a recorded Peak Particle Velocity of 7.71 mm/s. This was reported by e-mail on 30 September 2022 to DPHI with a corresponding response on 6 March 2023 closing this matter out with a record of the breach.

The other exceedance recorded was a Peak Particle Velocity of 5.1mm/s recorded on 18 March 2022. It was verified this related to the peak vector sum associated with the event and correspondence from the Regulator to this effect was sighted validating this was not a non-compliance.

An inconsistency was identified between Schedule 3, Condition 4(c) of the project approval which requires noise monitoring at least every three months or as otherwise agreed with the Secretary —and the approved Noise and Blast Management Plan, which allows for 6-monthly monitoring (summer and winter). This reduced frequency has been approved by DPHI and is reflected in the AEMRs for 2022, 2023, and 2024.

While operationally reasonable, it is recommended that this inconsistency be formally addressed under Schedule 2, Condition 3 by updating the management plan to reference the agreement with the Secretary.

Blakebrook Quarry has not exceeded the allowable two blasts per month limit at any time across the recorded period (January 2022 – December 2024). All blast frequencies are in accordance with Schedule 3, Condition 7 of the CoA. It was identified through consultation that there was concern raised related to the rattling of doors or windows during a blast by a sensitive receiver. The recorded levels of vibration, the location and the calibration records were reviewed in regard to this concern. As noted the recorded levels are consistent with the British standard for structural buildings *BS ISO 4866:2010* and are within the limits below cosmetic impacts associated with vibration.

The sensitive receivers utilises the limit of 5mm/s PPV which is above the recorded levels received at the monitoring sites for all recorded events during the audit period and impacts on the structure of the building would not be expected below this level based on this standard (Australian and New Zealand Environment Councils Technical Basis for Guidelines to Minimise Annoyance Due to Blasting Overpressure and Ground Vibration, September 1990).

Out of hours process

To undertake operations outside of hours in Table 1 (Schedule 3 Condition 1) of Project Approval 07_0020, an Out of Hours Work Protocol (OHWP) is required. Schedule 3 Condition 2A requires the OHWP to be approved by DPHI.

During the audit it was highlighted by the Asphalt Plant Surfacing Manager that there were significant challenges associated with the out of hours approval process related to the development of the campaigns. This related to the requirements related to asphalt surfacing driven by the clients for the batch plans. Specifically, Council and transport and the nature of the works.

Clients would require asphalt outside of hours where a traffic switch, road, or lane closure was required to minimise impacts on the travelling public. This request for materials was often haphazard and with very little lead time to facilitate the works being completed and the associated notification requirements under the OHWP.

Of note the complaints related to the facility have primarily resulted from noise and vibration, although the actual number of complaints are low and appropriate actions appear to have been completed by the asphalt facility to address the complaint in accordance with the CoA.

The approach of utilising an out of hours campaign appears to have arisen from the nature of asphalt production, clients' requests for supply and the associated need to meet specification compliance for the material that necessitated provision outside standard hours.

The administrative process for the out of hours protocol requires, determination of the likely need for the out of hours, the number of shifts required for the need and the consultation with the EPA, with residents and approval from DPHI for the Out of Hours Work Protocol (OHWP).

The current approach under the April to July 2025 OHWP (version 3.6) appears to provide some flexibility in regard to the timing of the shifts within the campaign itself (although these campaigns are limited). From an administrative perspective it may be worth considering extending the period of the campaigns to provide additional flexibility in performing out of hours works, while reducing the administrative burden.

The number of complaints received at the quarry and asphalt plant facility are relatively limited with noise related incidents over the three-year auditing period. The intent is not necessarily to increase the number of shifts under which the works are undertaken but to provide flexibility in when these shifts are completed. An approach to facilitate this is to incorporate the flexibility in the notification process on these out of hours works. The notification protocols and consultation would remain the same and the performance related to the campaign would still be assessed on the renewal of these works.

I believe a six-month period for the campaigns would be a reasonable approach. The OHWP provides provisions related to complaints for a 1st (resulting in a review of process and management) and then a 2nd complaint (resulting in a shutdown until an investigation is completed and accepted) this would not change.

Based on the number of complaints received it is still unlikely that for a campaign period that the operation would not be able to meet the requirements under the protocol with the existing provisions from the EPA and the DPHI.

Recommendation: It is recommended that the period for an out of hours works campaign is extended to cover a six-month period, utilising the existing compliance and complaints management framework (from EPA and DPHI) to reduce the administrative burden on approval.

A summary of the recommendations for noise and blasting is included below in Table 5.

Table 5: Noise and blasting recommendations and non-compliance

Number	Aspect	Notes
NB1	Out of Hours Work Protocol	It is recommended that the period for an out of hours works campaign is extended to cover a six-month period, utilising the existing compliance and complaints management framework (from EPA and DPHI) to reduce the administrative burden on approval.

3.2.2 Air quality

Previous AEMRs for Blakebrook Quarry have assessed dust deposition using the ash component of samples collected from dust deposition gauges. This approach is explained in the approved Air Quality Management Plan (MP07_0020) and has been adopted as a practical method to isolate and quantify dust attributable to quarry activities, by excluding organic materials such as insects and plant debris.

While this method is operationally appropriate and provides a more representative estimate of quarry-generated dust, it is inconsistent with the requirements of Modification 3, Schedule 3, Condition 10 of the project approval, as described in the *Project Approval Modification Report – Statement of Environmental Effects dated 24 July 2019*.

Specifically, Note (c) under Table 4 of the air quality impact assessment criteria states that “*deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003*.” Based on review, assessing only the ash content does not comply with this definition, which includes all insoluble material.

The AEMRs for 2022 and 2023, have reported compliance with the condition of approval against the ash content recorded, not the insoluble solids as required under the conditions of consent, and where exceedances were recorded against the insoluble solids not raised these as non-compliance. This has been

addressed in the 2024 AEMR where both analytes were identified under the CoA, reported as required, and incorporated into the report.

This issue may have resulted in an under reporting of the recorded exceedance results from the site against the CoA. This inconsistency is not provided for under Clause 3 of Schedule 2 of the COA, specifically:

Schedule 2, Clause 3

(3) If there is any inconsistency between the documents in condition 2(a), the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.

Non-compliance: For the 2023 and 2024 AEMR the dust deposition reporting has been against the Ash content rather than in accordance with the requirement “*deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003.*”

It is therefore recommended that either:

1. The project approval be formally amended to reflect current operational practice (i.e. assessing ash for deposited dust as a compliance assessment approach), or
2. The monitoring methodology be revised to include full analysis of insoluble solids in accordance with the Australian Standard. It is noted that the 2024 AEMR appears to be a reasonable compromise in the interim.

A breakdown of the recorded TSS levels (and Ash) are provided in Table 6 below. Of note the use of Ash consistent with the current approved Air Quality Management Plan (MP07_0020) is in the opinion of the auditor a more appropriate analyte to use for environmental monitoring for a quarry operation to determine compliance. Non-compliance events are noted in Table 6. Of note the further assessment of the exceedance was not completed to verify if the exceedance was the result of the operation of the quarry.

Table 6: Dust exceedance

Dust Station	Exposure period	Level of exceedance (Blakebrook Quarry – Dust results data – 2013 – 2025)	Notification of Non-compliance to DPHI	Notification to Landowner	Notes
2	7/3/2022 - 4/4/2022	TSS: 5.2 Ash Content: 0.4	None found	None found	Exceedances related to TSP not reported or mentioned in AEMR 2022.
2	9/1/2023 - 6/2/2023	TSS: 4.8 Ash Content: 1.1	None found	None found	Exceedances related to TSP not reported or mentioned in AEMR 2023.

Dust Station	Exposure period	Level of exceedance (Blakebrook Quarry – Dust results data – 2013 – 2025)	Notification of Non-compliance to DPHI	Notification to Landowner	Notes
3	7/3/2022 - 4/4/2022	TSS: 5.2 Ash Content 0.4	None found	None found	Exceedances related to TSP not reported or mentioned in AEMR 2022.
3	6/3/2023 - 3/4/2023	TSS: 4.8 Ash Content 1.8	None found	None found	Exceedances related to TSP not reported or mentioned in AEMR 2022.
3	13/11/2023- 11/12/2023	TSS: 4.3 Ash Content: 1.5	None found	None found	Exceedances related to TSP not reported or mentioned in AEMR 2022.

Air Quality Management Plan Review

The air quality monitoring undertaken for the project under the Air Quality Management Plan utilises dust deposition monitoring, TSP and PM10 recording. Condition 10 (MP07_0020) provides assessment criteria for the project relating to PM10 and TSP and deposited dust. The assessment of the PM10 and TSP have been varied in the updated Air Quality Management Plan (MP07_0020) to not require monitoring except in the circumstances where there is a sustained annual average dust deposition >4g/m²/ month over a three-month period.

This change is reasonable given the modelling that has been undertaken for the Air Quality Management Plan (MP07_0020) and the relatively compliant ongoing monitoring results from the dust deposition gauges for the monitoring.

Given this it is recommended that the wording in the Condition is adjusted to detail this trigger in the condition. In its current form the condition implies that the levels for TSP and PM10 are continually assessed which is not representative of the monitoring and could misrepresent the approach to monitoring under this condition.

In regard to the Dust deposition monitoring there are three separate dust deposition gauges for the project. These dust deposition gauges are placed at various locations surrounding the quarry site. The dust deposition gauges are as per below:

- Dust Deposition Gauge 1 (DDG1) (northern end of quarry) (160m).
- Dust Deposition Gauge 2 (DDG2) (Nimbin Road) (480m).

- Dust Deposition Gauge 3 (DDG3) (Booerie Creek Road) (over 960m).

Of note the large particles from a quarry operation will generally deposit within a few hundred meters from the dust source, while particles of an intermediate size range (10–30 µm) (potentially associated with crushing and screening) are likely to travel up to 200–500m.

Additional considerations include:

- orientation of receptors relative to the prevailing wind direction; and
- topography, terrain and physical features.

(IAQM (2016) Guidance on the Assessment of Mineral Dust Impacts for Planning. Institute of Air Quality Management, London)

The topography of the quarry and the surrounding landscape provides a significant barrier to dust dispersion outside of the quarry. The initial modelling undertaken for quarry was not reviewed as part of the audit and as such the nature of the air environment and the associated movement of air flow was not reviewed with the exception of data available on prevailing winds from the Bureau of Meteorology.

Effectively this means that the volumes of dust reaching the dust deposition gauges related to the quarry has for the most part been dropped out before reaching the dust deposition gauge locations at DDG 3 and DDG 2. Both sites have recorded elevated dust over the audit period. With the closest gauge to the quarry (DDG 1) not recording any elevated dust levels during the audit period, likely due to the prevailing wind conditions and the associated extraction operation from the quarry.

Dust deposition gauges themselves provide a means to assess ambient air and background air quality conditions and can provide an indicative level of deposition, above which complaints are more likely. The significant separation distances from the quarry, the elevation and the prevailing wind conditions limit the suitability of these dust deposition gauges for the purpose of compliance.

The location of DDG3 has several issues associated with this being used as a compliance assessment tool. These issues are summarised below:

- DDG 3 (Booerie Creek Road):
 - Significant elevation change between the quarry and the monitoring location (110m change). This likely results in shadowing from the terrain to the gauge site affecting dust deposition this far from the site.
 - The site is to the east with the prevailing wind conditions from the east, northeast and southeast moving from the surrounding area back towards the quarry.
 - The site location is adjacent to Booerie Creek Road. This road is unsealed at this location and adjacent land uses to the east of the site include grazing and farming. This would likely provide a far larger contribution of dust to the gauge than from the quarry.

From a compliance perspective, verification of dust emissions and their source at this location is unlikely to be possible without significant assessment and analysis of the dust particulates which makeup the samples collected. Which significantly limits the value of this dust deposition gauge for the purpose of compliance and likely only provides an understanding of the background conditions from this site location.

Based on my review, I believe that the current location for DDG 3 is not an appropriate location for a dust deposition gauge to assess nuisance dust emissions from the facility. It is recommended that an alternative monitoring point be considered. This gauge is recommended to be relocated to the west of the facility along Keerong Road within 200m of the intersection to Nimbin Road.

The benefit of this location is the adjacent road itself is sealed and the site is downwind of the prevailing existing wind conditions. In addition to a location change, I would recommend considering the use of a dust deposition gauge for the dust monitoring within the boundaries of the Quarry itself. Utilising this gauge as a compliance indicator for the operation.

Specifically, the dust deposition gauges offsite are used as the compliance trigger (with the trigger limit under the condition). The dust deposition gauge onsite is utilised to support further investigation.

The option for a new dust deposition gauge within the quarry and the suitability of DDG3 should be further investigated. The suitable location for the gauge (if progressed) should be setup between the northern pit and the asphalt plant in a location that meets AS/NZS 3580.10.1:2016.

If a new DDG monitoring site is not considered appropriate based on resourcing, an alternative is for the relocation of the DDG1 gauge to this site. In its current location DDG1 avoids the prevailing wind conditions for the site specifically the north-westerly and the north easterly wind directions and as such does not capture the prevailing wind conditions and any associated dust from the project.

An alternative to the use of a dust deposition gauge within the quarry, or the relocation of the dust deposition gauge (although recommended) is to change the offsite gauges to directional dust deposition gauges and monitor these in accordance with AS/NZS 3580.10.2:2013. This will help separate out the interference from surrounding dust emissions. This is the less preferred option for the recommended changes. Recommendations related to air quality are included in Table 7.

Table 7: Air quality recommendations

Number	Aspect	Recommendation
AQ1	Dust deposition methodology	It is recommended that either: 1. The project approval be formally amended to reflect current operational practice (i.e. assessing ash for deposited dust as a compliance assessment approach), or 2. The monitoring methodology be revised to include full analysis of insoluble solids in accordance with the Australian Standard. It is noted that the 2024 AEMR appears to be a reasonable compromise in the interim.
AQ2	TSP/PM10 monitoring trigger	It is recommended the wording in the Condition is adjusted to detail the PM10 monitoring trigger. In its current form the condition implies that the levels for TSP and PM10 are continually assessed which is not representative of the monitoring and could misrepresent the approach to monitoring under this condition.
AQ3	Location of DDG3	It is recommended that the current location for DDG 3 is not an appropriate location for a dust deposition gauge to assess nuisance dust emissions from the facility. It is recommended that an alternative monitoring point considered. This gauge is recommended be relocated to the west of the facility along Keerong Road within 200 m of the intersection to Nimbin Road.
AQ4	Internal dust monitoring	Install a dust deposition gauge within the quarry boundary between the Northern Pit and Asphalt Plant, to serve as a compliance support tool.

Number	Aspect	Recommendation
AQ5	Monitoring enhancement (alternative)	As a secondary option, convert existing offsite gauges to directional dust deposition gauges in accordance with AS 3580.10.2: 2013 to differentiate quarry-related dust from ambient sources.

3.2.3 Surface water quality

During the consultation for the audit, both the EPA and DPHI requested a review of the monitoring data and the monitoring locations for the project site related to water quality.

There were several recorded elevated levels over the audit period, these were recorded within the relevant AEMR reports. Of note the 2019 Soil and Water Management Plan does not include any monitoring or assessment criteria for analytes related to surface water monitoring (other than the required monitoring frequency) with these to be developed for the individual monitoring points following the completion of eight monitoring events.

In the interim while the criteria are being developed and finalised, it is recommended that the trigger limits related to a sediment basin discharge are utilised for investigation triggers (infield 27 NTU value (50mg/l equivalent)). This is regarding a recorded level at the surface water monitoring site. This will help identify a potential event that may have resulted in the elevated level. This would include further review of the quarry operations, the adjacent farming and any notable potential causes.

Of note the monitoring levels indicate spikes in the monitoring for the project related to the site for post rainfall and others where minimal rainfall has been received. An example is the event recorded on the 1st of September 2022 with a recorded value of 73mg/l TSS (NTU 125 in field). In the preceding 14 days there had been 18mm of rainfall with the highest recorded rainfall during that period at the onsite weather station of 9.2mm the day prior to the monitoring event with no discharge from the quarry basin. The site at SW5 (2022) also recorded elevated TSS (although below the laboratory trigger (40 mg/l and 92 NTU in field).

While similar events in June and March at SW1 recording substantially lower levels in TSS (21mg/l and 35 mg/l). The infield investigation of the characteristics from this event and others like it are not captured in the water monitoring information collected at the time. As such the determination of the likely cause of these spikes is not possible to discern from the data available and may or may not be (as noted in the AEMR 2022) related to the quarry site.

It is noted that the information collected has improved in the 2023 and in the 2024 monitoring period, but as there is no trigger for further investigation the only assessment is recorded at the sampling location and there is no further investigation of the spike.

The data collected currently lacks sufficient information for analysis and verification of the likely cause of the elevated level. Without the availability of further data a determination of causes and trends is not able to effectively be assessed for the site.

The basis of the existing Soil and Water Management Plan assumes that the catchments are unimpacted from the quarry except when there is a surface water release from SB1. This assumption may not necessarily reflect the reality of the water quality characteristics for these catchments. Additional assessment since the approved plan was developed relating to water balance calculations and surface water require further analysis in the development of an updated Soil and Water Management Plan. This is discussed further below.

Surface Water Monitoring

The approach being implemented for the Soil and Water Management Plans surface water quality monitoring plan includes a preference for sampling post a rainfall event greater than 25mm where there is no active or passive release from SW1. Specifically, the management plan (Soil and Water Management Plan 2019) notes:

This monitoring will ideally follow a rainfall event defined as (>25mm in 24 hours)⁹.

⁹*The receiving waters are largely ephemeral, with little or no surface flows present between events, precluding monitoring of dry weather flows.*

A review of the surface water monitoring undertaken for the 2022, 2023, and 2024 monitoring periods against the rainfall data identified that none of the monitoring events met this criterion. It was also noted that for the rainfall received in the preceding five days of a surface water monitoring event that the rainfall at the site did not reach this volume (>25mm) for all of the 2022, 2023 and 2024 monitoring events.

This has likely resulted in the lack of data associated with the small catchment upstream of SW5, with recorded surface water monitoring only undertaken on four monitoring events (in 2022) over the three-year audit period.

Water Balance Monitoring

In regard to the annual water balance reporting conducted for the site there is noted a significant seepage loss across the audit period for the northern pit. A breakdown of the seepage loss across the monitoring is included below:

- Annual seepage loss of 607.7ML from the northern pit was recorded in the 2022 annual water balance report
- Annual seepage loss of 198.2 ML from SB3 (northern pit basin) in the 2023 annual water balance report
- Annual seepage loss of 196 ML from SB3 (in the northern pit basin) was recorded in the 2024 annual water balance report.

It is noted in the 2022 water balance annual report that:

“Rapid seepage (exfiltration) was observed to occur from all water storages following rainfall, such that the available storage capacity was generally restored through natural processes (seepage and evaporation) within the required timeframe following the cessation of rainfall and pumping to the LPDs was not needed”.

And in the 2023 water balance annual report that:

“Quarry Management has advised that typically, all ponded water is lost (to seepage and evaporation) within a few days following rain and pumping of excess water directly to the LPD is rarely required”

This is consistent with the 2023 report and the same level of water seepage loss is noted in the 2024 annual water balance report. This seepage loss from the quarry may be relevant to the surface water monitoring for the project site.

Suitability of monitoring points

The catchments on the site for the monitoring points have been reviewed as part of the audit scope (raised by EPA, DPHI and CCC) and the suitability of these. Of note the catchments for SW2 and SW3 are part of the broader, very large catchment of Terania Creek and represent upstream and downstream points from the water that would flow from the quarry site through SW1 and SW5.

The catchments of SW1 and SW5 are both relatively small catchments. With the estimated area of each being:

- SW1, approximately 40 hectares
- SW5, approximately 22 hectares.

Based on these areas identified the catchment from SW5 is approximately half of the size of SW1. Of note the surface water monitoring for SW5 has only ever recorded results in the 2022 monitoring events during the audit period, and two recorded events in 2021 (outside the audit period).

Effectively only flowing for 25% of the audit period (results) during the high rainfall received in 2022 (annual rainfall of 4,235mm), as opposed to no flow periods in 2023 (annual rainfall 1028mm) and 2024 (annual rainfall 1914mm).

These continual flow events through SW1, and the associated recorded substantial seepage losses through the north pit (in the area of basin SB3) may indicate contributions to this surface water catchment from groundwater seepage from the quarry site. An investigation into this potential for the catchment is recommended to be completed to characterise this contribution of seepage into the surface water from the operation of the quarry.

In relation to the suitability of SW5 for water quality monitoring it is anticipated that more representative results from this catchment would be recorded through targeted monitoring events post rainfall. While events greater than 25mm in a 24hr period may be difficult to monitor (as specified in the Soil and Water Management Plan), a minimum rainfall event may be appropriate. As an example, a minimum rainfall event of 15mm in the preceding 24hr period could be utilised to target representative monitoring events. It appears that without the targeting of a rainfall period being prescribed in the Soil and Water Management Plan the monitoring is not recording an event or providing any data for analysis related to this catchment.

The remaining monitoring points are appropriate for the site with SW2 and SW3 utilised as upstream and downstream background monitoring points, while SW1 and SW5 are utilised as the impact monitoring points. It is not recommended that these are changed or modified at this point of time.

Licensed Point Discharge

The Licensed Point Discharge 4 (LPD) which has as yet not been approved was inspected during the site audit. The LPD runs from the southern pit and based on the Soil and Water Management Plan the release point is due west from this pit towards the monitoring point at SW5.

This LPD would require pumping to facilitate its use due to the terrain and the slope from the northern pit. The water from the quarry pit in the south flows to the northeast around the pit and then leaves the quarry site. This water appears to flow to the southeast of the site back towards Blakebrook Creek.

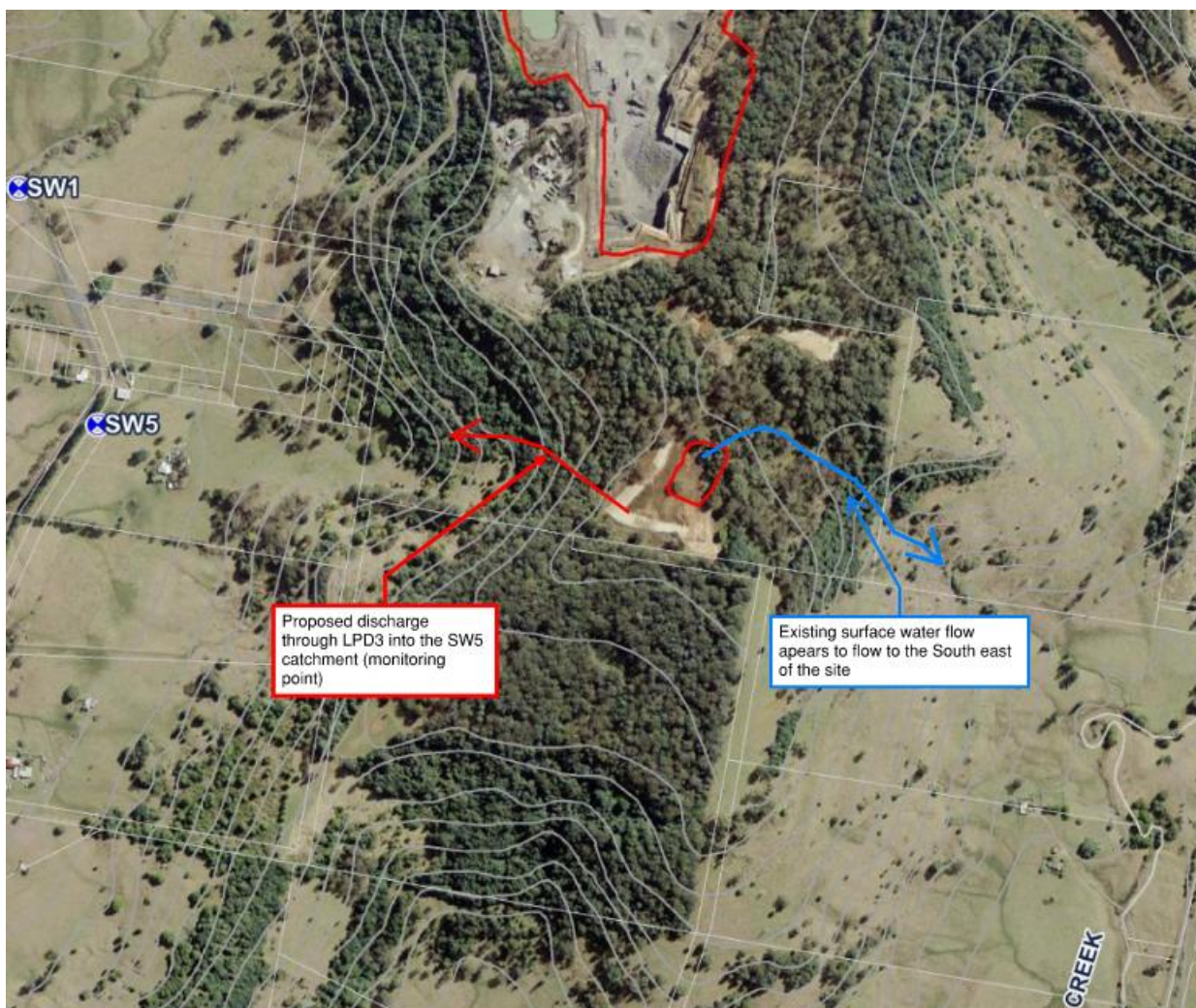
To ensure the discharge point from the facility was viable the site would either need to ensure all pumping was undertaken to the LPD3 point for the northern pit, with a level set to trigger pumping to ensure there was no overtopping back through the quarry to the east (as in the current condition for the site).

Or alternately investigate utilising a discharge point for the operation of the quarry to the east of the northern pit where the water currently runs (Figure 2). This may require an additional surface water monitoring point in Blakebrook Creek with additional verification relating to characterisation of this catchment. It is noted that this is currently being investigated for the site by LCC in regard to a suitable point for this purpose.

This eastern alternative from the southern pit has the advantage of utilising the terrain from the quarry to facilitate overtopping events following above design event rainfall and does not rely on significant pumping to facilitate this. If this is to be utilised a review of the quarry and footprint should be undertaken to ensure the operation of the quarry remains within the existing approved boundaries of the site.

It is recommended that the catchment to the east of the southern pit is investigated further for suitability given that the existing surface water flows from the site into that catchment to Blakebrook Creek.

Figure 2: LPD 3 and existing water movement



Basin Monitoring

During the reporting period water loggers were installed at a number of the basins. The water loggers installed monitor water volumes within the basins. In the AEMR for 2024, the report uses the terminology of “on or about” in regard to potential overtopping events. Given the use of these loggers on the site,

accurate details of the day the basin reaches capacity (potential period of discharge) should be recorded, not the approximations as provided within the report. This change will support effective analysis of compliance monitoring.

It was also noted that desilting of the basins was undertaken periodically as part of the management of the basin at SB1. In review however the last time this basin was desilted was in 2023 and it was noted that this would likely be required again.

As part of the maintenance of the basin a further review of the desilting process should be undertaken and an operational procedure developed to manage the monitoring and desilting required for the basin. The desilting of the basins should be recorded. This is consistent with the erosion and sediment control criteria under the soil and water management specifically the minimisation of excessive sediment within basins.

Soil and Water Management Plan Review

The approved Soil and Water Management Plan (2019), provides for the development of site-specific background water quality trigger values based on the catchment for the site utilising the ANZECC 2000 guidelines for the development of these trigger levels.

A preliminary review by the auditor of the available data was completed utilising the criteria for a moderately disturbed ecosystem (ANZECC 2000). The high variation amongst the data points for SW1 has not been adequately assessed within the monitoring for the AEMR reports. Specifically, a number of the spikes in the data may or may not be associated with the operation of the quarry or agricultural and farming practices within that catchment.

The contribution of the seepage associated with the Water Balance Assessment of the quarry should be assessed in regard to whether or not the quarry is contributing to the catchment of SW1 as a function of its operation. This understanding can then be utilised as guidance to support the development of appropriate trigger values for the surface water monitoring points.

In the currently approved Soil and Water Management Plan it appears that the assumption for SW1 that the catchment is unimpacted by the quarry (when there is no active or passive discharge from the surface water overflow points) for the purpose of using the ANZECC 2000 guidelines for the assessment of the trigger values may not be correct. Based on the available data it is recommended that the investigation into the SW1 catchment and potential contribution from the quarry to this catchment is completed prior to determination of site-specific triggers. Surface water recommendations are included in Table 8.

Table 8: Surface water recommendations

Number	Aspect	Recommendation
W1	Surface Water Quality investigation trigger levels	In the interim while the criteria are being developed and finalised, it is recommended that the trigger limits related to a sediment basin discharge be utilised for investigation triggers (infield NTU value). This is regarding a recorded level at the surface water monitoring site. This will help identify the potential event that may have resulted in the elevated level. This would include further review of the quarry operations, the adjacent farming and any notable potential causes.

Number	Aspect	Recommendation
W2	Surface water monitoring approach (Minimum Rainfall period)	A minimum rainfall event of 15mm in the preceding 24hr period could be utilised to target representative monitoring events (This would not change the frequency, just the time at which monitoring is completed). It appears without the targeting of a rainfall period being prescribed as required in the Soil and Water Management Plan the monitoring from SW5 is not being captured or assessed.
W3	Sediment basin (determination of capacity)	In the AEMR for 2024 the report uses the terminology of “on or about” in regard to potential overtopping events. Given the use of these loggers on the site accurate details of the day the basin reaches capacity (potential period of discharge) should be recorded, not the approximations as provided within the report. This change will support effective analysis of compliance.
W4	Sediment Basin (desilting)	As part of the maintenance of the basin a further review of the desilting process should be undertaken and an operational procedure developed to manage the monitoring and desilting required for the basin. This is consistent with the erosion and sediment control criteria under the soil and water management specifically the minimisation of excessive sediment within basins
W4	Surface water Catchment SW1 Characterisation and contribution from groundwater seepage	These continual flow events through SW1, and the associated recorded substantial seepage losses through the north pit (SB3) may indicate contributions to this surface water catchment from groundwater seepage from the quarry site. An investigation into this potential for the catchment is recommended to be completed to characterise this contribution of seepage into the surface water from the operation of the quarry.
W5	Determination of site specific trigger levels for the site	In the currently approved Soil and Water Management Plan it appears that the assumption for SW1 that the catchment is unimpacted by the quarry for the purpose of using the ANZECC 2000 guidelines for the assessment of the trigger values may not be correct. Based on the available data it is recommended that the investigation into the SW1 catchment and potential contribution from the quarry to the catchment is completed prior to determination of site-specific triggers for this catchment.
W6	Use of LPD3 or alternative discharge location for the operation of the northern pit	It is recommended that the catchment to the east of the northern pit is investigated further for suitability give the existing surface water flows from the site.

3.2.4 Ground water quality

The Soil and Water Management Plan for the site was reviewed as part of the audit to review effectiveness and compliance. The Soil and Water Management Plan includes a number of different analytes applicable to groundwater monitoring. A number of these are in-situ results from the water quality monitoring, including electrical conductivity and pH in addition to other analytes. Given the range of analytes recorded for the groundwater monitoring associated with the site it is worth considering the monitoring of turbidity (and TSS) in the groundwater water quality monitoring to support interpretation of data recorded including the potential or otherwise of contamination.

The Soil and Water Management Plan notes the recommendation from the 2016 groundwater quality report related to the analytes in the approved plan, however the inclusion of turbidity and TSS may further support effective groundwater interpretation. It is noted that elevated turbidity was observed in the water quality sampling in the 2023 AEMR related to a crevasse located adjacent to the BQN2-D monitoring well. This assessment of groundwater may support the investigation of the water balance related to the seepage loss from the northern pit of the quarry.

Table 9: Groundwater recommendations

Number	Aspect	Recommendation
GR1	Inclusion of turbidity in groundwater analysis	Include turbidity and TSS in the groundwater monitoring program. These parameters will support better interpretation of potential contamination and assist in groundwater characterisation.
GR2	Groundwater seepage potential contributions to Catchment SW1 (Refer also to W4)	Investigate potential seepage from the northern pit into the SW1 surface water catchment to understand if and how quarry operations may be influencing surface water quality.

3.2.5 Weed management measure

There are a number of processes applicable to weed management at the project site these are associated with the obligations under the Biodiversity and Rehabilitation Management Plan (Rehab Plan) and in regard to the quarry itself.

The Rehab Plan facilitates the management of the biodiversity offset strategy and the associated management of the rehabilitation bond for the site, the monitoring, and management of the identified rehabilitation areas within the quarry. Annual bush regeneration reports are included for the project and were reviewed for 2022, 2023 and 2024.

A review of site records verified that weed treatment has been completed as part of the Rehab Plan and associated management of the site, treatment records were sighted for 2024 in relation to Zones E5, W1, E2, W1 (for September and February).

Of note the regeneration contractor through discussions related to the site confirmed that generally the sites were doing ok with the eastern zones doing particularly well but had some concerns about the success in the open grassland to the southern zone of the site and whether this would require planting. It was noted

that the devils fig in zone S4 was a problem for weed management, and this was supported through discussions with the Quarry Manager for the site who indicated this was a challenge within the quarry itself.

Weed treatment was advised to occur in the quarry by the Quarry Team Leader and the Quarry Operations Coordinator. The treatment at the quarry is ad hoc treatment with the main target being the devils fig (*Solanum torvum*). As noted from the onsite component of the audit certificates were in place for both the Quarry Team Leader and the Quarry Operations Coordinator. It was advised that there were no records of the actual weed treatment undertaken.

It is recommended that records are maintained of weed treatment in accordance with the *Agricultural and Veterinary Chemicals Act 1994*. This includes details of the chemicals used, application rate, date, method of application and name of person applying the chemical etc. recommendations related to weed management is provided in Table 10.

Table 10: Weed management recommendations

Number	Aspect	Recommendation
WM1	Inclusion records of weed treatment by the quarry	It is recommended that records are maintained of weed treatment in accordance with the <i>Agricultural and Veterinary Chemicals Act 1994</i> . This includes details of the chemicals used, application rate, date, method of application and name of person applying the chemical etc.

3.2.6 Traffic and transport

Truck dispatch data for Blakebrook Quarry from 2022 to 2024 indicates compliance with the daily laden truck limits specified in the CoA. In 2022, the highest daily dispatch recorded was 119 trucks in July, remaining just under the 120 truck/day limit. In 2023, the highest was 99 trucks in March, and in 2024, it was 106 in November—both well within the applicable daily thresholds (120 trucks/day prior to 29 April 2024, and 150 trucks/day thereafter). No exceedances of the approved daily truck movement limits were identified during this three-year period.

The published documents (e.g., [blakebrook-quarry-truck-movement-register-january-december-2023.pdf](#) and [quarry-vehicle-and-exit-data-january-to-december-2024.pdf](#)) include dispatch times only and do not record arrival times. Details are provided in Table 11.

Table 11: Dispatch records

AEMR	2022	2023	2024
Exceedances of either 120 or 150 laden trucks per calendar day	None. Highest number of trucks per day during the year was 119 in July (AEMR 2022)	None. Highest number of trucks per day during the year was 99 in March (Quarry truck movement sheet 2023 and AEMR 2023)	None. Highest number of trucks per day during the year was 106 in November (AEMR 2024)

Accurate records to and from (including time of arrival and dispatch) publish every 6 months	Dispatch times recorded	Published 22 February 2024	Published 9 January 2025 Dispatch times recorded – not arrival times
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During the onsite inspection of the project it was identified that material loads into the site for the purpose of materials for production of asphalt and quarry product brought into the site are tracked and recorded at the weighbridge but do not appear to be captured in the annual reporting for the project published on the website.

The Approval MP07-0020 defines a laden as:

***Laden:** Trucks transporting quarry products from the site and/or trucks transporting topsoil or mulch to the site*

Although requirements for monitoring of trucks in relation to transport to and from the site is included within the approval conditions under Schedule 2- Condition 8 and Schedule 3- Condition 22(a) it appears that the intent in regard to the application of the term “laden” to these conditions may require clarification.

In the current form the application of the term “laden” only applies to trucks transporting quarry products from the site, or mulch and topsoil. The term laden does not appear to apply to asphalt products from the asphalt plant.

It is recommended that the definition of laden be adjusted to include asphalt products for the project with particular relevance to Schedule 3-Conditions 20, 22(b) and 22(c) of the planning approval.

This does not meet the intent to keep “accurate records of all laden truck movements to and from the site (including time of arrival and dispatch).” As such, while physical truck movement limits were complied with, the record keeping and reporting obligations may require additional data to be included in the published information.

It is noted that empty trucks are not recorded. During the site inspection and interview with the Surfacing Manager for the asphalt plant it was noted that the quarry does receive off spec asphalt product from the operation of the batching plant. It did not appear that this was included in the data published and is not required under the current conditions. Details of the recommendation related to traffic and transport is provided in Table 12.

Table 12: Traffic and transport recommendations

Number	Aspect	Recommendation
TM1	Definition of 'Laden' under MP07-0020	Consider revising the definition of 'laden' to include trucks transporting asphalt products from the facility, particularly in reference to Schedule 3, Condition 20, 22(b) and (c), to ensure all relevant outbound materials are captured in compliance reporting.

3.3 Adequacy of Environmental Management Plans, sub-plans and post approval documents

The adequacy of post approval documents must be determined on the basis of whether:

- There are any non-compliances resulting from the implementation of the document; and
- Whether there are any opportunities for improvement.

A review was conducted on the implementation of the following plans:

- Environmental Management Strategy
- Aboriginal Heritage Management Plan
- Noise Management Plan
- Air Quality Management Plan
- Bush regeneration plan.

The documents were considered to be generally adequate for the operations being undertaken, however there are several recommendations related to these plans which have been captured within this audit. These are included in Table 14. These recommendations are provided based on the review of updated information and assessments that post-date the management plans for the project.

The annual reports from 2022 to 2024 and monitoring reports were reviewed to assess the Proponent performance on their compliance to the EPL 3384. Recorded details are summarised below:

- Annual Report 1 Jan-2022 to 1 Jan 2023
 - Noted 2 noise complaints related to vibration, blasting and noise
 - Noted non-compliance related to active discharge from the quarry site
 - Noted issue related to waste acceptance (since addressed for the project site).
- Annual Report 1 Jan 2023 to 1 Jan 2024
 - Non-compliance related to routine noise monitoring in winter at one sensitive receiver
 - Non-compliance with the approved out of hours works protocol notification
 - Non-compliance with notification timeframes for blasting.
- Annual Report 1 Jan 2024 to 1 Jan 2025
 - Noted 2 complaints received relating to vibration and blasting
 - Non-compliance related to routine noise monitoring in winter at one sensitive receiver, for the Asphalt plant during out of hours work with the truck operator utilising excessive exhaust braking on the way out of the quarry. Discussion with the Surfacing Manager confirmed the actions taken to address the noise.

These annual returns reviewed identified generally minor non-compliance events related to the site and its operation. Of note noise and vibration was the key aspect of concern related to the project, although these had been effectively actioned and managed by the project.

3.4 Management review

The management review process for the quarry is generally very comprehensive covering key system and processes and their management on site. This process however is focused on the quarry operations itself and although the asphalt operation is recorded and discussed, the Surfacing Manager or an appropriate Downer Representative are not included within the management review.

Given the significance of the asphalt plant to environmental performance an opportunity for improvement is their inclusion in the management review process.

Table 13: Management review

Number	Aspect	Recommendation
MR1	Management Review	As an opportunity for improvement, include an appropriate representative from the Asphalt plant in the management review process to contribute to the management of the Blakebrook Quarry site.

4 SUMMARY OF RECOMMENDATIONS & NON-COMPLIANCES

4.1 Recommendations

The following table consolidates all recommendations arising from the 2022-2024 Independent Environmental Audits of Blakebrook Quarry, grouped by environmental aspect. The recommendations outlined below are intended to support ongoing compliance with the project's approval conditions, environmental management plans, and broader regulatory obligations. They reflect practical opportunities for improvement based on current site operations and available data.

It is recommended that the Proponent review each action, allocate responsibility, and determine suitable timeframes for implementation. These actions are recommended to be integrated into the site's environmental management systems and tracked through routine internal processes and future AEMRs.

Where recommendations relate to compliance risks—such as reporting accuracy, monitoring methods, or trigger thresholds—priority should be given to implementing these actions within three months of submitting this audit report.

Table 14: Summary of recommendations

Recommendations		
Number	Aspect	Recommendation
NB1	Out of Hours Work Protocol	It is recommended that the period for an out of hours works campaign is extended to cover a six-month period, utilising the existing compliance and complaints management framework (from EPA and DPHI) to reduce the administrative burden on approval.
AQ1	Dust deposition methodology	It is recommended that either: 1. The project approval be formally amended to reflect current operational practice (i.e. assessing ash for deposited dust as a compliance assessment approach), or 2. The monitoring methodology be revised to include use of insoluble solids for compliance assessment in accordance with the Australian Standard. It is noted that the 2024 AEMR appears to be a reasonable compromise in the interim.
AQ2	TSP/PM10 monitoring trigger	It is recommended the wording in the Condition related to PM10 and TSP, is adjusted to detail the PM10 monitoring trigger under the Air Quality Management Plan. In its current form the condition implies that the levels for TSP and PM10 are continually assessed which is not representative of the monitoring and could misrepresent the approach to monitoring under this condition.
AQ3	Location of DDG3	It is recommended that the current location for DDG 3 is not an appropriate location for a dust deposition gauge to assess nuisance dust emissions from the facility. It is recommended that an alternative monitoring point be considered. This gauge

Recommendations		
Number	Aspect	Recommendation
		is recommended to be relocated to the west of the facility along Keerong Road within 200 m of the intersection to Nimbin Road.
AQ4	Internal dust monitoring	Install a dust deposition gauge within the quarry boundary between the Northern Pit and Asphalt Plant, to serve as a compliance support tool.
AQ5	Monitoring enhancement (alternative)	As a secondary option, convert existing offsite gauges to directional dust deposition gauges in accordance with AS 3580.10.2: 2013 to differentiate quarry-related dust from ambient sources.
W1	Surface Water Quality investigation trigger levels	In the interim while the criteria are being developed and finalised, it is recommended that the trigger limits related to a sediment basin discharge be utilised for investigation triggers (infield NTU value). This is in regard to a recorded level at the surface water monitoring site. This will help identify the potential event that may have resulted in the elevated level. This would include further review of the quarry operations, the adjacent farming and any notable potential causes.
W2	Surface water monitoring approach (Minimum Rainfall period)	A minimum rainfall event of 15mm in the preceding 24hr period could be utilised to target representative monitoring events. It appears without the targeting of a rainfall period being prescribed as required in the Soil and Water Management Plan the monitoring from SW5 is not being captured or assessed.
W3	Sediment basin (determination of capacity)	In the AEMR for 2024 the report uses the terminology of “on or about” in regard to potential overtopping events. Given the use of these loggers on the site accurate details of the day the basin reaches capacity (potential period of discharge) should be recorded, not the approximations as provided within the report. This change will support effective analysis of compliance.
W4	Sediment Basin (desilting)	As part of the maintenance of the basin a further review of the desilting process should be undertaken and an operational procedure developed to manage the monitoring and desilting required for the basin. This is consistent with the erosion and sediment control criteria under the soil and water management specifically the minimisation of Excessive sediment within basins
W4	Surface water Catchment SW1 Characterisation and	These continual flow events through SW1, and the associated recorded substantial seepage losses through the north pit (SB3) may indicate contributions to this surface water catchment from groundwater seepage from the quarry site. An

Recommendations		
Number	Aspect	Recommendation
	contribution from groundwater seepage	investigation into this potential for the catchment is recommended to be completed to characterise this contribution of seepage into the surface water from the operation of the quarry.
W5	Determination of site specific trigger levels for the site	In the currently approved Soil and Water Management Plan it appears that the assumption for SW1 that the catchment is unimpacted by the quarry for the purpose of using the ANZECC 2000 guidelines for the assessment of the trigger values may not be correct. Based on the available data it is recommended that the investigation into the SW1 catchment and potential contribution from the quarry to the catchment is completed prior to determination of site-specific triggers for this catchment.
W6	Use of LPD3 or alternative discharge location for the operation of the northern pit	It is recommended that the catchment to the east of the northern pit is investigated further for suitability give the existing surface water flows from the site.
GR1	Inclusion of turbidity in groundwater analysis	Include turbidity and TSS in the groundwater monitoring program. These parameters will support better interpretation of potential contamination and assist in groundwater characterisation.
GR2	Groundwater seepage potential contributions to Catchment SW1 (Refer also to W4)	Investigate potential seepage from the northern pit into the SW1 surface water catchment to understand if and how quarry operations may be influencing surface water quality.
WM1	Inclusion records of weed treatment by the quarry	It is recommended that records are maintained of weed treatment in accordance with the Agricultural and Veterinary Chemicals Act 1994. This includes details of the chemicals used, application rate, date, method of application and name of person applying the chemical etc.
TM1	Definition of 'laden' under MP07-0020	Consider revising the definition of 'laden' to include trucks transporting asphalt products from the facility, particularly in reference to Schedule 3, Condition 22(c), to ensure all relevant outbound materials are captured in compliance reporting.
MR1	Management Review	As an opportunity for improvement, include an appropriate representative from the Asphalt plant in the management

Recommendations		
Number	Aspect	Recommendation
		review process to contribute to the management of the Blakebrook Quarry site.
Site Inspection Recommendations		
SI1	Site Inspection Basin SB1	This information along with the height marker for the basin capacity (required volume for an empty basin) should be utilised to confirm that the basin has achieved the required 5-day operational basin capacity post rainfall. This should also be recorded once this has been achieved for the site related to rainfall events received. It may be that this is confirmed through record keeping or alternately through the logger records.
SI2	Site Inspection Overflow drain between Basin SB2 and SB1	It is recommended that the connection between SB1 and SB2 is reinstated as per the current management plan, or an operational procedure is developed for the purpose of transfer of water from SB2 to SB1 is prepared to facilitate dewatering.
SI3	Site Inspection Asphalt operation	The transport of the off-spec asphalt back to the quarry has not been recorded for the site. This should be captured and recorded in the truck volumes.
SI4	Site Inspection Asphalt plant western bund	Waste materials on the edge of the asphalt plant site bund should be removed and tidied up
SI5	Site Inspection Decommissioned tank at rear of asphalt plant	There is a decommissioned tank at the rear (western side of the batch plant that sits outside of the bund this should be relocated within the bund.

4.2 Non-compliances

Non-compliances related to the audit period are provided in Table 15. These non-compliances in accordance with the NSW Independent Environmental Audit Guidelines (2020, DPIE) include the following:

- An issue that was non-compliant during the audit period, even if this has been rectified
- Non compliances recorded from the audit during the review of documentation, site inspections and assessments associated with the project.

Table 15: Non-compliances

Number	Aspect	Notes
NC1	Terms of Approval Schedule 2, Condition 8	A minor exceedance related to asphalt quantities was recorded with 50,063.21 tonnes of asphalt exceeding the maximum production value.

Number	Aspect	Notes
		This was recorded in the 2022 AEMR and reported to DPHI as a non-compliance in February 2023. No further action required.
NC2	Hours of Operation Schedule 3 Condition 2A	A non-compliance was recorded in 2023 relating to insufficient notification to affected residents prior to six OOHW events. This was acknowledged in the AEMR and corrective actions were implemented. Compliance with Schedule 2, Condition 2A was not maintained during this period.
NC3	Terms of Approval Schedule 2, Condition 3	There is an inconsistency related to Condition 10 of Schedule 3 related to air quality monitoring. Specifically, the use of ash instead of insoluble solids as defined in Australia Standard, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. The AEMRs for 2022 and 2023 reported compliance against ash content values, rather than insoluble solids as required by the condition. Where exceedances were recorded based on insoluble solids, these were not identified or reported as non-compliances. It is noted that the associated verification on the source of the exceedance was not verified for these (these may or may not have resulted from the quarry, this was not verified). This has been addressed in the 2024 AEMR where both ash and insoluble solids were reported and considered under the CoA.
NC4	Notification to Landowners Schedule 4, Condition 1	Although the non-compliance reporting has been generally completed for the site there are a number of separate exceedances associated with meeting the 7-day reporting timeframes relevant to the incidents of noncompliance. Additionally, there are a number of exceedances associate with a misinterpretation of the air quality monitoring data for the site. These are presented in Table 7. This represents a non-compliance with Schedule 4, Condition 1 and links to the interpretation in NC4.
NC5	Soil and Water Management Schedule 3, Condition 19	Monitoring programs for surface water and groundwater are detailed and aligned with CoA. LCC holds a Water Access Licence (WAL). Non-compliances with the Soil and Water Management Plan occurred during

Number	Aspect	Notes
		the audit period, however these were notified, actioned and closed out. Groundwater exceedances occurred in 2022 and throughout 2024 and were reported to DPHI with supporting investigations. There are a number of exceedance records related to the data under the AEMR reporting, and monitoring data. Some of these relate to surface water monitoring points SW2 and SW3 related to background water quality conditions. Others relate to SW1. The currently approved Soil and Water Management Plan currently relies on the water balance developed at the time of approval. Subsequent water balance verification data developed as part of the reporting differs significantly from the existing water balance and requires an update. Recommendations on the update are provided in Section 3.2. This non-compliance was identified in a previous AEMR and is required to be reported in the IEA.

4.3 Environmental performance

The annual reports from 2022 to 2024 and monitoring reports were reviewed to assess the Proponent performance on their compliance to the EPL 3384.

- Annual Report 1 Jan-2022 to 1 Jan 2023
 - Noted 2 noise complaints related to vibration, blasting and noise
 - Noted non-compliance related to active discharge from the quarry site
 - Noted issue related to waste acceptance (since addressed for the project site).
- Annual Report 1 Jan 2023 to 1 Jan 2024
 - Non-compliance related to routine noise monitoring in winter at one sensitive receiver
 - Non-compliance with the approved out of hours works protocol notification
 - Non-compliance with notification timeframes for blasting.
- Annual Report 1 Jan 2024 to 1 Jan 2025
 - Noted 2 complaints received relating to vibration and blasting
 - Non-compliance related to routine noise monitoring in winter at one sensitive receiver, for the Asphalt plant during out of hours work with the truck operator utilising excessive exhaust braking on the way out of the quarry. Discussion with the Surfacing Manager, confirmed the actions taken to address the noise.

These annual returns reviewed identified generally minor non-compliance events related to the site and its operation. Of note noise and vibration was the key aspect of concern related to the project.

4.4 Other matters considered relevant by the Auditor or DPHI

Matters addressed as part of the consultation are summarised within Table 16.

Table 16: Findings for matters addressed as part of consultation

Consultee	Aspect	Audit Findings
DPHI	A review of surface water and dust monitoring locations, considering the effects of local traffic on gravel roads, interactions with cattle and birds, and recommendations for potential improvements in placement or design.	A review of surface water and dust monitoring locations was undertaken. Recommendations are included in the report related to the analyte used, the locations and opportunities for the quarry in regard to environmental management.
DPHI	A review of the implementation of weed management measures across the quarry and a recommendation for any improvements.	A review of weed treatment was undertaken for the site, weed treatment records were reviewed and the contractor performing the works interviewed. There were recommendations identified and recorded.
DPHI	A review of dust management at the quarry.	Dust management at the site follows the utilisation of a water cart to control and minimise dust generation. Crushing and screening equipment on the site often utilised skirts to minimise dust generation. The data recorded from the site monitoring generally indicates that dust is primarily under control at the project.
DPHI	A review of the asphalt plant Out of Hours Works Protocol process with a focus on the administrative aspects including but not limited to the timeline of campaigns.	The out of hours works protocols were reviewed for the site. Of note the OOWH protocols are based on a campaign basis and are instigated by Council or TfNSW road works. Although this is notified for the campaign the Surfacing Manager for the asphalt facility advised that the site is often very little time for consulting with residents.
DPHI & CCC	Assess that compliance monitoring is correct and fit for purpose.	Compliance monitoring for the site has been reviewed with recommended changes related to the Soil and Water Management Plan and the Air Quality Management Plan for the site.
CCC	Conflicts between DPHI and EPL requirements were raised, with a request to resolve inconsistencies and clarify obligations under both approvals, particularly regarding their impact on the CCC.	Compliance monitoring for the site has been reviewed with recommended changes related to the Soil and Water Management Plan and the Air Quality Management Plan for the site. Updates to these may encompass both approvals if adopted.

Consultee	Aspect	Audit Findings
EPA & DPHI	Review of surface water and dust monitoring locations, considering impacts from local traffic, cattle, and birds, with recommendations for potential improvements or redesign.	Compliance monitoring for the site has been reviewed with recommended changes related to the Soil and Water Management Plan and the Air Quality Management Plan for the site. This has included recommended adjustments to dust monitoring and water quality monitoring for the site.
EPA	Clarification of environmental monitoring locations and their suitability, specifically: • Monitoring of water quality (upstream and downstream) • Location of monitoring for water quality • Location of monitoring for dust deposition • Dust at the site (Complaints of dust from the site) • Monitoring point LPD 3.	A review of monitoring locations has been undertaken for the site. Of note there are a number of recommendations related to surface water, groundwater and dust deposition gauges and their monitoring. The potential approval of the monitoring point LPD3 was discussed with an LCC representative.
DPHI	Progress in weed management and treatment. Recommendations for improvement.	A review was undertaken for weed management and treatment. Recommendations are provided in Section 3.2.5.
DPHI	Asphalt plant hours OOHWP process focussing on administrative aspects including the timeline of campaigns.	A review was undertaken for the OOHWP. Recommendations are provided in Section 3.2.1.
Sensitive receiver	Odour from operation of the asphalt plant during nighttime operations.	A review was undertaken for the existing asphalt batch plant. Records for the changeover of the baghouse filter were sighted for the assessment. The operation of the existing plant is to be replaced by the operation of a newer batch plant for the facility. This being currently progressed to commissioning as the infrastructure has been established for the site. As noted in the Air Quality Management Plan, odour may result from the facility during very still air conditions from the facility. The change to the newer plant may benefit the operation and performance of the plant. Recommendations on the plant itself has been included in the compliance table of this report.

Consultee	Aspect	Audit Findings
Sensitive receiver	Blasting operations and resulting vibration from the facility.	A review was undertaken for the blasting. Details are provided in Section 3.2.1.
Sensitive receiver	Noise levels from the facility during nighttime operations.	A review was undertaken for the OOHWP. Recommendations are provided in Section 3.2.1.

4.5 Complaints

A complaints register is being maintained by the Project. The register is published monthly on the Project website. A total of five complaints were received during the audit period. Four of these related to noise, vibration, or blast notification issues, while one complaint concerned odour. All complaints were considered by the Project to be closed. The Auditor agrees with this position.

4.6 Incidents

The following incidents were noted and reported to DPHI over the audit period:

- 9 May 2022

During an EPA site visit it was identified that stormwater was being discharged from sediment basin SW1.

- Throughout 2023

Exceedances of lead, iron, oil, and grease were recorded at several monitoring bores. Following review of the annual data, LCC engaged Ecoteam to undertake a groundwater investigation to identify the potential sources of contamination. Ecoteam determined that sources of lead and iron were of natural origin and the exceedances were correlated with rainfall.

Subsequent testing utilising the silica gel clean-up inferred the source is of recorded levels related to oil and grease and TRH to be of a natural occurrence.

- March 2023

Between 2:30 pm - 3:12 pm on 15 March 2023, sensitive receivers were notified of an upcoming blast. The blast was executed at 12:15 pm on 16 March 2023. This provided sensitive receivers with between 21 - 22 hours' notice. Sensitive receivers require a minimum of 24 hours' notice prior to blasting activities. This was recorded in the AEMR.

- June 2023

During routine noise monitoring in June, the measured noise levels at Receiver 8 exceeded the day, evening and nighttime noise limit criteria of 35dB(A) LAeq,15min. The Asphalt Plant was identified as the contributor to the exceedances. The exceedances were 5.6 decibels for the daytime, 0.3 decibels for the evening, and 2.3 decibels for the nighttime. The fans were upgraded within the Asphalt Plant and modified the flow of trucks during out-of-hours work to reduce the noise attributable to reversing beepers.

- 1 July – 31 Oct 2023

The Asphalt Plant Operator failed to notify LCC and the EPA at least seven days' prior to undertaking out-of-hours work on six occasions between July and October. Internal investigations identified that this incidence of non-compliance was primarily due to Asphalt Plant Operator not being aware of their obligations under the OHWP, EPL 3384, and Project Approval MP07 0020. Following the incident, the Asphalt Plant Operator implemented measures to mitigate further non-compliance.

- 18 Sep 2023 to 16 Oct 2023
Ash deposits at monitoring gauge D3 were 10.3 g/m²/month. This exceeds the allowable criteria (ash > 4 g/m²/month) as stipulated by Schedule 3 Condition 10. During the 2023 monitoring period, dust deposition gauge D3 was relocated closer to Boorerie Creek Road to address safety concerns with regards to property access and the presence of dogs. During the exposure period, the predominant winds were from the northeast. The Quarry is located to the northwest. This was recorded in the AEMR
- 11 Dec 2023 – 08 Jan 2024
Ash deposits at monitoring gauge D3 were 9.3 g/m²/month. This exceeds the allowable criteria (ash > 4 g/m²/month) as stipulated by Schedule 3 Condition 10. During the 2023 monitoring period, dust deposition gauge D3 was relocated closer to Boorerie Creek Road to address safety concerns with regards to property access and the presence of dogs. During the exposure period, the predominant winds were from the northeast. The Quarry is located to the northwest. This was recorded in the AEMR.
- 29 May 2024

During winter evening/night monitoring on 29 May 2024, a noise exceedance from the asphalt plant was recorded at Receiver 8. Council self-reported the exceedance to DPHI and EPA on 26 June 2024 and notified affected landowners in accordance with Schedule 4, Condition 1(a). A report was submitted to both agencies on 28 June, and the EPA closed the matter on 12 July. Due to limited nightworks, DPHI approved supplementary monitoring to occur during the 2025 summer period. This was conducted on 6 February 2025 with no exceedances recorded.

Ecoteam recommended, based on advice from Ambience Audio Services, installing LED signage to discourage compression braking. A truck involved in a separate noise incident was banned and the driver re-inducted. Additional noise mitigation measures may be considered following further consultation.
- 13 Feb 2024 – 5 Dec 2024

During 2024, two exceedances in SSt were detected at monitoring station D3, while one exceedance was detected at monitoring station D2. The exceedances were minor, and all levels of dust deposition measured as ash content were well below the air quality assessment criteria of 4 g/m²/mth. In addition, sustained annual average dust deposition (SSt and ash content) for all station were >4 g/m²/mth. Exceedances were self-reported on 13 February 2024, 26 July 2024 and 5 December 2024, however using ash content as an indicator of quarry dust content; rather than the required suspended particulates (refer to details in Section 3.2.2) for dust monitoring.
- 2024 period

pH and TSS exceeded the trigger limits in surface water sampling sites at both upstream and downstream sampling sites and therefore likely to be representative of environmental conditions rather than pollution from the quarry site. pH, EC, lead, iron have exceeded, interim trigger values outlined in the SWMP within groundwater on some occasions.

4.7 Actual versus predicted impacts

The audit considered the actual impacts arising from the carrying out of the operations and whether they are consistent with the relevant impacts predicted in the EIS. A summary of the assessment is presented in Table 17.

Table 17: Summary of predicted versus actual impacts

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
Physical extent of the development in comparison with the approved boundary and any potential off-site impacts	The approved Project boundary is defined within MP07_0020 Mod 3 Appendix 1 – Approved Project Plan.	It was advised that the Project footprint was the same as was covered within MOD 3, noting that minor blasting had been undertaken. A review of the current survey footprint was completed noting that during the site visit this appeared to be reflected both in the survey and from the site visit.	Y
Traffic and transport	The increased production level to 600,000 tonnes will require 100 laden trucks to travel to and from the site per day over 226 days. This quantity of trucks means that future truck activity on Nimbin Road will double the prior existing numbers of trucks per day and increase the number of haulage days.	Extracted material quantities during the audit period were consistent with the CoA for the site. There was a recorded exceedance related to asphalt quantities produced for the project. The exceedance was minor in context but remains consistent with the approval quantities for the project.	Y
Noise	Moderate short term operation noise impacts on nearby receivers above the relevant Noise Management Levels.	Noise monitoring has been completed at the three specified primary locations. Results from analysis of monitoring results confirmed that noise emissions derived from quarrying operations were generally below specified limits. With some out of hours exceedances recorded related to exhaust braking on exit from the site, and operation of the asphalt plant at night. There has also been a non-compliance with the OOHWP. The operation however	Y

Aspect	Summary of predicted impacts	Summary of actual impacts observed during audit period	Consistent (Y/N)
		remains consistent with the predicted impact.	
Blasting and vibration	Air blast overpressure may exceed criteria resulting in damage to buildings and structures.	Vibration monitoring associated with blasting was undertaken on four occasions at specified locations. Monitoring results indicated compliance with the approval conditions.	Y
Aboriginal Heritage	Quarry operations may result in disturbance to Aboriginal objects or places with archaeological significance.	No objects or items of Aboriginal Cultural Significance identified during the audit period. The chance finds process is included in the Induction for the project.	Y
Fauna Habitat	The proposed quarry expansion will result in the removal of a large number of native trees that provide suitable foraging, breeding and refuge habitat for locally occurring fauna species as well as a number of hollow bearing trees that contain den, roost and breeding sites	The Biodiversity Offset Strategy, and the associated management plan is being implemented on the project and progressed for the site. Management measures being implemented support the rehabilitation of areas to provide for additional habitat.	Y

Appendix A

Audit Table

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
SCHEDULE 2 – ADMINISTRATIVE CONTROLS				
Obligation to Minimise Harm to the Environment				
1	In addition to meeting the specific performance measures and criteria established under this approval, the Proponent must implement all reasonable and feasible measures to prevent or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the project.	• Environmental Management Strategy Version 4.3 – January 2024 • DPHI Approval of Environmental Management Strategy – 2 February 2024 • Air Quality Management Plan – September 2023 • Noise and Blast Management Plan – August 2022 • Aboriginal Heritage Management Plan – August 2023 • Operational Traffic Management Plan – February 2024 • Biodiversity and Rehabilitation Management Plan Version 4.1 – March 2019 • Pollution Incident Response Management Plan – 2021 • Biodiversity Offset Strategy – 2019 • Soil and Water Management Plan – February 2019 • Biodiversity Strategy – July 2019	Management controls have been implemented under the approved management plans for the project. Document review, site inspection, and interview with the auditee confirm that reasonable and feasible measures are in place to minimise environmental harm. Compliance with Schedule 2, Condition 1 is confirmed.	C
Terms of Approval				
2	The Proponent must carry out the project: (a) generally in accordance with the EA, EA (Mod 1) and MR (Mod 3); and (b) <i>Notes: in accordance with the conditions of this approval, Project Layout Plan and the Statement of Commitments.</i> • <i>The Project Layout Plan is shown in Appendix 1;</i> • <i>The Statement of Commitments is reproduced in Appendix 2.</i>	• Survey Map 22/04/2025 (Byron Bay Surveying Pty Ltd) • Air Quality Management Plan September 2023 • Noise and Blast Management Plan August 2022 • Aboriginal Heritage Management Plan August 2023 • Operational Traffic Management Plan Feb 2024 • Biodiversity and Rehabilitation Management Plan V4.1 March 2019 • Biodiversity Offset Strategy 2019 • Soil and Water Management Plan February 2019 • Biodiversity Strategy Jul 2019	The site inspection, auditee interviews, and documentary evidence confirm that the project is being conducted in general compliance with the CoA, Project Layout Plan, and Statement of Commitments. Compliance with Schedule 2, Condition 1 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
3	If there is any inconsistency between the documents in condition 2(a), the most recent document shall prevail to the extent of the inconsistency. However, the conditions of this approval shall prevail to the extent of any inconsistency.	• Pollution Incident Response Management Plan – 2021 • Air Quality Management Plan Version 3.1 – August 2018 • Noise and Blast Management Plan Version 3.1 – August 2018 • Aboriginal Heritage Management Plan Version 3.1 – August 2018 • Operational Traffic Management Plan Version 3.1 – August 2018 • Biodiversity and Rehabilitation Management Plan Version 4.1 – March 2019 • Soil and Water Management Plan – February 2019	There is an inconsistency relating to Schedule 3, Condition 10 concerning the interpretation of air quality monitoring exceedances. The Air Quality Management Plan (v3.1, August 2018) has not been updated to align with current monitoring practices, leading to a misinterpretation of air quality criteria. This inconsistency creates ambiguity in compliance assessment and has contributed to multiple reporting exceedances being handled inconsistently. Refer to Recommendation Table 14	NC3
4	The Proponent must comply with any written requirement/s of the Secretary arising from the Department's assessment of: (a) any strategies, plans, programs, reviews, audits, reports or correspondence that are submitted in accordance with this approval (including any stages of these documents); (b) (b) any reviews, reports or audits undertaken or commissioned by the Department regarding compliance with this approval; (c) and the implementation of any actions or measures contained in these documents.	• Air Quality Management Plan- September 2023 • Air Quality Management Plan – September 2023 • Noise and Blast Management Plan – August 2022 • Aboriginal Heritage Management Plan – August 2023 • Operational Traffic Management Plan – February 2024 • Biodiversity and Rehabilitation Management Plan Version 4.1 – March 2019 • Biodiversity Offset Strategy – 2019 • Soil and Water Management Plan – February 2019 • Biodiversity Strategy – July 2019 • Pollution Incident Response Management Plan – 2021 • Air Quality Management Plan Version 3.1 – August 2018 • Noise and Blast Management Plan Version 3.1 – August 2018 • Aboriginal Heritage Management Plan Version 3.1 – August 2018 • Operational Traffic Management Plan Version 3.1 – August 2018	Compliance with Schedule 2, Condition 4 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
5	By 30 June 2010, the Proponent shall surrender development consent DA 95/239 to the relevant consent authority to the satisfaction of the Secretary.	Surrendered, documentation: Council confirmed the Development Consent No. 5.1990.341.5 was formally surrendered under Section 67 of the Environmental Planning and Assessment Regulation 2021 by mail (MJK:5.1990.341.5) on the 22/12/2022.	Compliance with Schedule 2, Condition 5 is confirmed.	C
5A	Within 12 months of the date of commencement of development under this consent, or other timeframe agreed by the Secretary, the Proponent must surrender development consent DA90/341 to the satisfaction of the Secretary, in accordance with the EP&A Regulation.	Surrendered, documentation: Council confirmed the Development Consent No. 5.1990.341.5 was formally surrendered under Section 67 of the Environmental Planning and Assessment Regulation 2021 by mail (MJK:5.1990.341.5) on the 22/12/2022.	Compliance with Schedule 2, Condition 5A is confirmed.	C
Limits on Approval				
6	The Proponent may carry out quarrying operations and Asphalt plant operations on the site until 31 December 2039. <i>Note: Under this approval, the Proponent is required to rehabilitate the site and carry out additional requirements and undertakings to the satisfaction of the Secretary. Consequently, this approval will continue to apply in all respects other than the right to conduct quarrying operations until the rehabilitation of the site and those requirements and undertakings have been carried out to the standard required by the applicable conditions.</i>	- Approval 07_2020 Modification 3 - Approval 07_2020 Modification 1 - Associated management documentation	Compliance with Schedule 2, Condition 6 is confirmed.	C
7	The Proponent must not undertake quarrying operations below 55 m AHD in the northern pit or 105 m AHD in the southern pit. <i>Note: Drainage sumps may be constructed below this level with the agreement of the Secretary.</i>	- Survey Map (22 Apr 2025) prepared by Byron Bay Surveying Pty Ltd - Interview with LCC Compliance Coordinator	The latest survey mapping for the quarry dated 22/04/2025 (Byron Bay Surveying Pty Ltd) verified that the quarry remains above the 105m AHD for the Quarry. The exception to the depth within the quarry relates to the Sediment Basins for the project site. With these down to a depth of 95m AHD in the north of the site. The southern pit has not been excavated in some time and was not able to be verified on site as to the depth (This was full of water).	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
			Compliance with Schedule 2, Condition 7 is confirmed.	
8	The Proponent must not: (a) transport more than 600,000 tonnes of quarry products from the site per calendar year; (b) transport more than 50,000 tonnes of asphalt from the site per calendar year; (c) dispatch more than 120 laden trucks from the site on any calendar day prior to the completion of intersection upgrade required by Condition 21(f) of Schedule 3 to the satisfaction of TfNSW; and (d) dispatch more than 150 laden trucks from the site on any calendar day following completion of the intersection upgrade required by Condition 21(f) of Schedule 3 to the satisfaction of TfNSW. <i>Note: Dispatch of laden trucks is also controlled under condition 1 of Schedule 3.</i>	• AEMR 2022 • AEMR 2023 • AEMR 2024 • Daily truck movement records (Jan–Dec 2022, Jan–Dec 2023, Jan–Dec 2024) • Truck exit times (Jan–Dec 2022, Jan–Dec 2023, Jan–Dec 2024)	A minor exceedance related to asphalt quantities was recorded with 50,063.21 tonnes of Asphalt exceeding the maximum production value. This was recorded in the 2022 AEMR and reported to DPHI as a non-compliance in February 2023. No further action required.	NC1
Structural Adequacy				
9	Existing buildings and structures, are constructed in accordance with the relevant requirements of the BCA. <i>Notes:</i> • <i>Under Part 4A of the EP&A Act, the Proponent is required to obtain construction and occupation certificates for any proposed building works;</i> • <i>Part 8 of the EP&A Regulation sets out the requirements for the certification of the project.</i>	There is a new asphalt batch plant on site, that has not yet been commissioned: • New asphalt plant has been constructed at the site for the purpose of replacing the existing plant with a more efficient plant • Awaiting information from Downer.	The plant is currently under construction and certificates under Part 4 A of the EP&A act are required prior to commissioning and operation.	C
Demolition				
10	The Proponent must ensure that all demolition work is carried out in accordance with Australian Standard AS 2601-2001: The Demolition of Structures, or its latest version.	There has been no demolition work carried out on the project site. Interviews: • Downer • LCC	Once the new Downer plant is operational the existing plant will be decommissioned for the project site. This is yet to occur.	NT
Protection of Public Infrastructure				

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
11	Unless the Proponent and the applicable authority agree otherwise the Proponent must: (a) repair, or pay the full costs associated with repairing, any public infrastructure that is damaged by the project; and (b) relocate, or pay the full costs associated with relocating, any public infrastructure that needs to be relocated as a result of the project. <i>Note: This condition does not apply to damage to roads caused as a result of general road usage or otherwise addressed by contributions required by condition 13 of Schedule 2.</i>	LCC advised that no damage attributable to Blakebrook Quarry operations was identified during the audit period. Complaints register reviewed – no complaints were received relating to infrastructure damage.	This has not been triggered.	NT
Operation of Plant and Equipment				
12	The Proponent must ensure that all the plant and equipment used at the site, or to monitor the performance of the project is: (a) maintained in a proper and efficient condition; and (b) operated in a proper and efficient manner.	Calibration of monitoring equipment was confirmed in supporting reports and registers, including: • Blast monitoring equipment (Instantel Blastmate III) • Vibration monitoring (Instantel Micromate) • Water quality meters (Aqua Troll 500) • Noise meters used during the 2022, 2023, and 2024 monitoring events, as detailed in the AEMRs • Source emissions monitoring records (May 2021) – Lismore Asphalt Plant • Asphalt Plant Tonnage Mix Calibration Register • Baghouse replacement record for the batch plant • Loader maintenance records (Asphalt Plant)	Compliance with Schedule 2, Condition 12 is confirmed.	C
Section 9 Contributions				
13	The Proponent must pay Council an annual financial contribution toward the maintenance of local roads used for haulage of quarry products. The contribution must be determined in accordance with the Lismore City Council Section 94 Contribution Plan, 2004, or any subsequent relevant contributions plan adopted by Council.	• S97 Levy payments 2022 (Asphalt and Quarry) • S97 Levy payments 2023 (Asphalt and Quarry) • S97 Levy payments 2024 (Asphalt and Quarry)	Compliance with Schedule 2, Condition 9 is confirmed.	C
Production Data				
14	The Proponent must:	• AEMR Reports 2022, 2023, 2024. • Daily truck movements Jan – Dec 2022	Of note laden trucks in and out of the quarry are recorded but not differentiated	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(a) from the commencement of quarrying operations provide calendar year annual quarry production data to MEG using the standard form for that purpose; and (b) b) include a copy of this data in the Annual Review.	• Daily truck movements Jan – Dec 2023 • Daily truck movements Jan – Dec 2024 • Truck exit times Jan – Dec 2022 • Truck exit times Jan - Dec 2023 • Truck exit times Jan – Dec 2024	within the report. Refer to Recommendation A2. Compliance with Schedule 2, Condition 14 is confirmed.	
Compliance				
15	The Proponent must ensure that all employees, contractors and sub-contractors are aware of, and comply with, the conditions of this approval relevant to their respective activities.	• Driver induction • Blakebrook Quarry induction • Visitor induction • Induction register 2021-2024 • Sign-on register	Of note this is the subject of previous Independent Audit recommendations refer to Table 4. These items have been closed out. Compliance with Schedule 2, Condition 15 is confirmed.	C
Identification of Boundaries				
16	The Proponent must ensure that the boundaries of the approved limits of extraction are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits.	• Survey Map (22 Apr 2025) – Byron Bay Surveying Pty Ltd • Mapping from MOD 1. LCC advises that boundaries are marked physically with large white pegs and digitally using GIS mapping.	Of note access was restricted to the upper benching in the quarry due to restriction from water in sediment basin 3 and the last round of blasting undertaken on the northern end of the quarry preventing access to that part of the site. Based on the available assessment Compliance with Schedule 2, Condition 16 is confirmed.	C
SCHEDULE 3 – SPECIFIC ENVIRONMENTAL CONDITIONS				
Noise				
Hours of Operation				
1	The Proponent must comply with the operating hours set out in Table 1.	• AEMR 2022 • AEMR 2023	Blasting activities occurred within the approved window except for one instance on 23 December 2022, which occurred at	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status										
	<i>Table 1: Operating hours</i> <table><tr><th>Activity</th><th>Permissible hours</th></tr><tr><td rowspan="2">Quarrying operations. Asphalt plant operations and loading and dispatch laden trucks</td><td>7am to 6pm Monday to Friday</td></tr><tr><td>7am to 3pm Saturday</td></tr><tr><td rowspan="2">Blasting</td><td>10am to 3pm Monday to Friday (except public holidays)</td></tr><tr><td>At no time on Sundays or public holidays</td></tr><tr><td>Maintenance</td><td>May be conducted at any time, provided that these activities are not audible at any privately-owned residence</td></tr></table>	Activity	Permissible hours	Quarrying operations. Asphalt plant operations and loading and dispatch laden trucks	7am to 6pm Monday to Friday	7am to 3pm Saturday	Blasting	10am to 3pm Monday to Friday (except public holidays)	At no time on Sundays or public holidays	Maintenance	May be conducted at any time, provided that these activities are not audible at any privately-owned residence	• AEMR 2024 • Complaints register 2022 • Complaints register 2023 • Complaints register 2024 • Out of Hours Work Protocol approval letters and records (including 2023 and April 2024) • Noise and blast monitoring data (2022, 2023, 2024) • Correspondence with TfNSW regarding OHWP approvals	9:10 am. This was self-reported as a non-compliance. No other exceedances were recorded during 2023 or 2024. Out-of-hours asphalt operations were conducted under approved OHWP arrangements. One 2023 administrative warning was issued due to a reporting error, not an unauthorised activity. Maintenance works were undertaken only when inaudible at sensitive receivers. Compliance with Schedule 3, Condition 1 is confirmed.	
Activity	Permissible hours													
Quarrying operations. Asphalt plant operations and loading and dispatch laden trucks	7am to 6pm Monday to Friday													
	7am to 3pm Saturday													
Blasting	10am to 3pm Monday to Friday (except public holidays)													
	At no time on Sundays or public holidays													
Maintenance	May be conducted at any time, provided that these activities are not audible at any privately-owned residence													
2	The following activities may be carried out outside the hours specified in condition 1 above: a) delivery or dispatch of materials as requested by Police or other public authorities; and b) emergency work to avoid the loss of lives, property or to prevent environmental harm. In such circumstances, the Proponent must notify the Secretary and affected residents prior to undertaking the activities, or as soon as is practical thereafter.	• OOHWP Protocol (Apr 2024 – Jul 2025) • DPHI approval of OOHWP Protocol • Resident notification letter from Asphalt Plant (16 May 2025, for works 25 May – 8 Jun 2025)	This condition was not triggered during the audit period.	NT										
2A	With the prior written agreement of the Secretary, the Proponent may undertake limited campaign asphalt plant operations (within the limits imposed under condition 8 of Schedule 2) outside of the operating hours prescribed in condition 1 of this Schedule, as requested by public authorities. In such circumstances, the applicant must prepare an Out of Work Hours Work Protocol. This protocol must: (a) be prepared in consultation with the EPA and any residents who may be affected by the noise generated by these works; and	• Reviewed LCC to EPA correspondence for OHWP campaigns: - July & December 2022 - May–June & December 2023 - April–July 2025 (OOHWP v3.2–v3.6) • Sighted DPHI approvals for all OOHWP versions • Cross-checked AEMRs (2022, 2023, 2024) for reporting of OOHWP events and complaints • Identified one non-compliance: insufficient notification for six OOHWP events (July–Oct 2023) • Non-compliance was acknowledged in AEMR and corrective actions implemented	A non-compliance was recorded in 2023 relating to insufficient notification to affected residents prior to six OOHWP events. This was acknowledged in the AEMR and corrective actions were implemented. Compliance with Schedule 2, Condition 2A was not maintained during this period. See Recommendation in Table 14	NC2										

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status						
	(b) (b) be approved by the Secretary prior to the commencement of any out of hours Asphalt plant operations.	December 2023 campaign (8–10 Dec) was notified on 30 November and considered compliant								
3	The Proponent must ensure that the noise generated by the project does not exceed the criteria in Table 2 at any residence on privately-owned land. <i>Table 2: Noise criteria dB(A)</i> <table><tr><th>Receiver^a</th><th>Day L_{Aeq} (15 minute)</th></tr><tr><td>Location 2 and Location 7</td><td>36</td></tr><tr><td>All other locations</td><td>35</td></tr></table> Noise generated by the project is to be measured in accordance with the relevant requirements and exemptions (including certain meteorological conditions) of the NSW Industrial Noise Policy. Appendix 5 sets out the meteorological conditions under which these criteria apply and the requirements for evaluating compliance with these criteria. However, the noise criteria in Table 2 do not apply if the Proponent has an agreement with the relevant landowner to exceed the noise criteria, and the Proponent has advised the Department in writing of the terms of this agreement.	Receiver ^a	Day L _{Aeq} (15 minute)	Location 2 and Location 7	36	All other locations	35	- Reviewed noise monitoring results in AEMRs for 2022, 2023, and 2024 - Confirmed that noise monitoring was conducted in accordance with the NSW Industrial Noise Policy and meteorological exclusions - AEMRs reported compliance with noise criteria in Table 2 for all monitoring periods - No breaches of L_{Aeq}(15min) criteria were recorded at any receiver location - No landowner agreements to exceed noise limits were identified or reported	Noise monitoring reports in the AEMRs for 2022, 2023, and 2024 confirmed compliance with the requirements under this condition. No exceedances were recorded. Compliance with Schedule 3, Condition 3 is confirmed.	C
Receiver ^a	Day L _{Aeq} (15 minute)									
Location 2 and Location 7	36									
All other locations	35									
Operating Conditions										
4	The Proponent must: (a) implement best practice management to minimise the construction, operational and road transportation noise of the project; (b) minimise the noise impacts of the project during meteorological conditions when the noise criteria in this approval do not apply (see Appendix 5); (c) carry out noise monitoring (at least every 3 months or as otherwise agreed with the Secretary) to determine whether the project is complying with the relevant conditions of this approval; and	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Noise and Blast Management Plan (Rev 4.1, Sept 2022) - Noise monitoring results (2022–2024) - DPHI approval of Noise and Blast Management Plan	Noise monitoring has been undertaken on a 6-monthly basis in accordance with the approved Noise and Blast Management Plan, despite the project approval requiring 3-monthly monitoring. No monitoring events during the audit period were affected by meteorological conditions that would trigger exemptions under Appendix 5. It is recommended to resolve the inconsistency by updating either the	C						

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status								
	(d) regularly assess noise monitoring data and modify and/or stop operations on site to ensure compliance with the relevant conditions of this approval, to the satisfaction of the Secretary. <i>Note: Required frequency of noise monitoring may be reduced if approved by the Secretary.</i>		project approval or the Noise and Blast Management Plan in accordance with Schedule 2, Condition 3. See Recommendation in Table 14									
Noise Management Plan												
5	The Proponent must prepare a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must (a) be prepared in consultation with the EPA. (b) be submitted to the Secretary within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary. (c) describe the measures to be implemented to ensure: • compliance with the noise criteria and operating conditions of this approval; • best practice management is being employed; and • the noise impacts of the project are minimised during meteorological conditions under which the noise criteria in this approval do not apply (see Appendix 5); (d) describe the proposed noise management system; and (e) include a monitoring program to be implemented to measure noise from the project against the noise criteria in Table 2. The Proponent must implement the Noise Management Plan as approved from time to time by the Secretary.	• Noise and Blast Management Plan (Rev 4.1, Sep 2022) • DPHI approval of Noise and Blast Management Plan (20 Oct 2022) • Noise monitoring results in AEMR 2022 • Noise monitoring results in AEMR 2023 • Noise monitoring results in AEMR 2024	A Noise Management Plan (NMP) has been prepared to the satisfaction of the Secretary, in consultation with the EPA, and submitted within the required timeframe following Modification 1. The current version (Rev 4.1, September 2022) was approved by the Secretary on 20 October 2022. The proponent has implemented the noise monitoring program as required, with twice-annual measurements conducted in accordance with the NMP. Monitoring results confirm compliance with the prescribed noise criteria at Locations 2, 4, and 8, including adherence to the stricter 36 dB(A) limit at Location 2. Compliance with Schedule 3, Condition 5 is confirmed.	C								
Blasting												
Blasting Impact Assessment Criteria												
6	The Proponent must ensure that blasting on site does not cause any exceedance of the criteria in Table 3. <i>Table 3: Blasting Criteria</i> <table><tr><th>Receiver</th><th>Air blast overpressure</th><th>Ground vibration</th><th>Allowable exceedance</th></tr><tr><td></td><td></td><td></td><td></td></tr></table>	Receiver	Air blast overpressure	Ground vibration	Allowable exceedance					• Noise and Blast Management Plan (Rev 4.1, Sep 2022) • AEMR 2022 • AEMR 2023 • AEMR 2024	A ground vibration exceedance was recorded on 26 September 2022 and self-reported to DPHI. : In 2024, two blasts were undertaken and monitored in accordance with Schedule 3, Condition 6. All recorded ground vibration	C
Receiver	Air blast overpressure	Ground vibration	Allowable exceedance									

Unique ID	Requirement				Evidence collected	Audit Findings and Recommendations	Compliance Status
		(dB(Lin Peak))	(mm/s)			and airblast levels were below the applicable limits of 5 mm/s and 115 dB (Lin Peak), respectively. Two complaints were investigated, with monitoring data confirming full compliance. No exceedances were recorded. Compliance with Schedule 3, Condition 6 is confirmed.	
		120	10	0%			
	Any residence on privately-owned land	115	5	5% of the total number of blasts over a period of 12 months			
However, these criteria do not apply if the Proponent has a written agreement with the relevant owner to exceed the limits in Table 3, and the Proponent has advised the Department in writing of the terms of this agreement.							
Blasting frequency							
7	The Proponent may carry out a maximum of 2 blasts per month, unless an additional blast is required following a blast misfire. This condition does not apply to blasts required to ensure the safety of the quarry or workers on site. <i>Note: For the purposes of this condition, a blast refers to a single blast event, which may involve a number of individual blasts fired in quick succession in a discrete area of the quarry.</i>				• AEMR 2022 • AEMR 2023 • AEMR 2024	Blasting records confirm that the blast events undertaken throughout 2022, 2023 and 2024, are in compliance. Compliance with Schedule 3, Condition 7 is confirmed.	C
Operating Conditions							
8	During blasting operations, the Proponent must: (a) implement best practice management to: • protect the safety of people and livestock; • protect public or private infrastructure and property from damage; and • minimise the dust and fume emissions (b) operate a suitable system to enable the local community to get up-to-date information on the proposed blasting schedule on site; and (c) carry out regular monitoring to determine whether the project is complying with the relevant conditions of this approval, to the satisfaction of the Secretary.				• Noise and Blast Management Plan (Rev 4.1, Sep 2022) • AEMR 2022 • AEMR 2023 • AEMR 2024	No exceedances were recorded, and the AEMR confirms compliance with Schedule 3, Condition 8 to the satisfaction of the Secretary. This includes community engagement, monitoring and implementation of controls to protect the sensitive receivers. Compliance with Schedule 3, Condition 8 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status																								
Blast Management Plan																												
9	The Proponent must prepare a Blast Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary; (b) describe the measures to be implemented to ensure compliance with the blast criteria and operating conditions of this approval; (c) include measures to manage flyrock to ensure the safety or people and livestock and to protect property; (d) include a monitoring program for evaluating and reporting on compliance with the blasting criteria in this approval; (e) include local community notification procedures for the blasting schedule, in particular to nearby residences; and (f) include a protocol for investigating and responding to complaints related to blasting operations. The Proponent must implement the Blast Management Plan as approved from time to time by the Secretary.	- Noise and Blast Management Plan (Rev 4.1, Sep 2022) - AEMR 2022 - AEMR 2023 - AEMR 2024	Compliance with Schedule 3, Condition 9 is confirmed.	C																								
Air Quality																												
Air Quality Impact Assessment Criteria																												
10	The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not cause exceedances of the criteria in Table 4 at any residence on privately-owned land. Table 4: Air quality criteria <table><tr><th colspan="4">Table 4: Air quality criteria</th></tr><tr><th>Pollutant</th><th>Averaging Period</th><th colspan="2">Criterion</th></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>Annual</td><td colspan="2">^{a,d} 25 µg/m³</td></tr><tr><td>Particulate matter < 10 µm (PM₁₀)</td><td>24 hour</td><td colspan="2">^b 50 µg/m³</td></tr><tr><td>Total suspended particulates (TSP)</td><td>Annual</td><td colspan="2">^{a,d} 90 µg/m³</td></tr><tr><td>^c Deposited dust</td><td>Annual</td><td>^b 2 g/m²/month</td><td>^{a,d} 4 g/m²/month</td></tr></table> Notes to Table 4:	Table 4: Air quality criteria				Pollutant	Averaging Period	Criterion		Particulate matter < 10 µm (PM ₁₀)	Annual	^{a,d} 25 µg/m ³		Particulate matter < 10 µm (PM ₁₀)	24 hour	^b 50 µg/m ³		Total suspended particulates (TSP)	Annual	^{a,d} 90 µg/m ³		^c Deposited dust	Annual	^b 2 g/m ² /month	^{a,d} 4 g/m ² /month	- Weather station calibration and recording data - Register of air quality from the mobile batch plant - Air Quality Management Plan (v3.1, August 2018) - AEMR 2022 - AEMR 2023 - AEMR 2024 - Dust Results register (2013-2025) - HVAS Monitoring event 2018 (ERM) - Interview Surfacing Manager (19/05/2025) (Asphalt) - Interview Quarry Manager (19/05/2025)	There is an inconsistency related to Condition 10 of Schedule 3 related to air quality monitoring. Specifically, the use of Ash instead of Insoluble solids as defined in Australia Standard, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. The AEMRs for 2023 and 2024 reported compliance against ash content values, rather than insoluble solids as required by the condition. Where exceedances were recorded based on insoluble solids, these	NC3
Table 4: Air quality criteria																												
Pollutant	Averaging Period	Criterion																										
Particulate matter < 10 µm (PM ₁₀)	Annual	^{a,d} 25 µg/m ³																										
Particulate matter < 10 µm (PM ₁₀)	24 hour	^b 50 µg/m ³																										
Total suspended particulates (TSP)	Annual	^{a,d} 90 µg/m ³																										
^c Deposited dust	Annual	^b 2 g/m ² /month	^{a,d} 4 g/m ² /month																									

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(a) Cumulative impact (ie increase in concentrations due to the project plus background concentrations due to all other sources). (b) Incremental impact (ie increase in concentrations due to the project alone, with zero allowable exceedances of the criteria over the life of the project. (c) Deposited dust is to be assessed as insoluble solids as defined by Standards Australia, AS/NZS 3580.10.1:2003: Methods for Sampling and Analysis of Ambient Air - Determination of Particulate Matter - Deposited Matter - Gravimetric Method. (d) Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents or any other activity agreed by the Secretary. (e) "Reasonable and feasible avoidance measures" includes, but is not limited to, the operational requirements in conditions 11, 12 and 13 to develop and implement an air quality management system that ensures operational responses to the risks of exceedance of the criteria.		were not identified or reported as non-compliances. It is noted that the exceedance may or may not be attributable to the quarry, however this was not assessed at the time. This has been addressed in the 2024 AEMR where both ash and insoluble solids were reported and considered under the CoA. See recommendation Table 14	
Operating conditions				
11	The Proponent must: (a) implement best practice management to minimise the dust emissions of the project; (b) regularly assess meteorological and air quality monitoring data and relocate, modify and/or stop operations on site to ensure compliance with the air quality criteria in this approval; (c) minimise the air quality impacts of the project during adverse meteorological conditions and extraordinary events (see note d under Table 4); (d) monitor and report on compliance with the relevant air quality conditions in this approval; and (e) minimise the area of surface disturbance and undertake progressive rehabilitation of the site, to the satisfaction of the Secretary.	• Weather station monitoring records and register 2008 to 2024 • AEMR 2022 • AEMR 2023 • AEMR 2024	The proponent implemented dust controls as outlined in the AQMP supported by daily site inspections. Meteorological and air quality data were reviewed regularly, and operations were modified when required to maintain compliance. The site responded appropriately to adverse meteorological conditions, including through the use of water carts and temporary activity adjustments. Compliance monitoring was conducted in accordance with approved methods, and results were reported in the AEMRs. While progressive rehabilitation had not yet been triggered due to the current operational stage, the proponent	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
			maintained minimal active disturbance areas and applied stabilisation measures where feasible. Compliance with Schedule 3, Condition 11 is confirmed.	
Air Quality Management Plan				
12	The Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be submitted to the Secretary for approval within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary; (b) describe the measures to be implemented to ensure: - compliance with the air quality criteria and operating conditions of this approval; - best practice management is being employed; and - the air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events (c) describe the proposed air quality management system; include an air quality monitoring program that: - is capable of evaluating the performance of the project; - includes a protocol for determining any exceedances of the relevant CoA; and - effectively supports the air quality management system. The Proponent must implement the approved Air Quality Management Plan as approved from time to time by the Secretary.	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Dust Monitoring Procedure -Work Method statement 4 26 Oct 2023: Letter LCC to DPHI non-compliance notification - Nov 2023: Dust Exceedance Report ED23/55183 2 Nov 2023: Email LCC to EPA – submission of non-compliance 2 Nov 2023: Email LCC to landowner of [REDACTED] Booerie Creek Rd 23 Jan 2024: Email LCC (Compliance) to LCC (Records) dust exceedance at dust monitoring location D3 (on privately owned property at [REDACTED] Booerie Ck Rd) 23 Jan 2024: Email LCC to landowner at [REDACTED] Booerie Creek Rd - Jan 2024: Dust Exceedance Report ED24/3072 30 Jan 2024: Email DPHI to LCC (Compliance) acknowledgement of Dust Exceedance Notification 19 Feb 2024: Email LCC (Compliance) to LCC (Records) dust exceedance at dust monitoring location D3 (on privately owned property at [REDACTED] Booerie Ck Rd). 19 Feb 2024: Email LCC to Landowner at [REDACTED] Booerie Ck Rd notifying of exceedance - Feb 2024: Dust Exceedance Report ED24/6635 22 Feb 2024: Email DPHI to LCC (Compliance) acknowledgement of Dust Exceedance Notification	The AQMP (Rev. 3.1) was endorsed in 2018 and remained in effect during 2022 and 2023. A revised AQMP (Rev. 4.2) was endorsed on 16 January 2024. The 2024 revision introduced refinements over the earlier version. The Air Quality Management Plan was submitted in accordance with the post-Modification 1 timeline and endorsed by the Secretary. The AEMRs confirm the plan was implemented as approved throughout the 2022–2024 reporting periods. The dust monitoring approach within the Air Quality Management Plan should be revisited with regards to the site selection and monitoring approach. The current approach makes verification of resulting dust difficult to verify. Please see recommendations in Table 14	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
		29 Jul 2024: Email LCC (Compliance) to LCC (Records) Dust exceedance at dust monitoring location D3 (on privately owned property at [REDACTED] Nimbin Rd). 29 Jul 2024: Letter LCC to landowner advising of exceedance at [REDACTED] Nimbin Rd - Jul 2024: Dust Exceedance Report ED24/28637 4 Sep 2024: Email DPPI LCC (Compliance) acknowledgement of Dust Exceedance Notification 13 Nov 2024: Email LCC to DPPI Dust Exceedance Report for October discussion. - Dec 2024: Dust exceedance report (ED24/47827) 2 Dec 2024: Email LCC to landowner at [REDACTED] Boorie Creek Rd notifying of exceedance 9 Dec 2024: Email DPPI to LCC (Compliance) acknowledgement of Dust Exceedance Notification.		
Meteorological Monitoring				
13	For the life of the project, the Proponent must ensure that there is a suitable meteorological station operating in the vicinity of the site that complies with the requirements in the Approved Methods for Sampling and Analysis of Air Pollutants in New South Wales guideline.	Records or documents reviewed: - Rainfall Records 2008 to 2024 - Field Calibration Record 2023 - Field Calibration record 2024 - Interview with Quarry Manager (19/05/2025)	The meteorological station has been in continuous operation on site since 2018 and was upgraded in 2022. The station meets the requirements of the Approved Methods guideline and provides validated data used in compliance monitoring throughout the 2022–2024 period. Compliance with Schedule 3, Condition 13 is confirmed.	C
Greenhouse Gas Emissions				
14	The Proponent must implement all reasonable and feasible measures to minimise the release of greenhouse gas emissions from the site.	- Quarry maintenance register 2024-2025 - AEMR 2022	Compliance with Schedule 3, Condition 14 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
		• AEMR 2023 • AEMR 2024		
Soil and Water				
Water supply				
15	The Proponent must ensure that it has sufficient water for all stages of the project, and if necessary, adjust the scale of operations under the approval to match its available water supply, to the satisfaction of the Secretary	• DPHI Correspondence on WAL • Water metre reading from Main Tank for Surface Water Balance (2022 to 2024) • WAL45172 • AEMR 2022 • AEMR 2023 • AEMR 2024 • Sediment Basin Testing records	The site water balance assessments and operational records confirm that the proponent maintained sufficient non-potable water supply across all years through rainfall capture, and groundwater seepage. In 2024, further improvements were implemented including updated sediment basin surveys, installation of water level markers, and enhanced flow monitoring. Water truck usage was tracked and adjusted to balance dust suppression with storage transfers. Of note there has been no sediment basin releases since March 2022. See recommendations in Table 14	C
Water Discharge				
16	The Proponent must comply with the discharge limits in any EPL, or with section 120 of the POEO Act.	• Sediment Basin Testing records (2021 - March 2022) • Surface water monitoring Procedure-Work Method Statement 3 • Sediment Dam Active Releases Procedure-Work Method Statement 1 • Surface water monitoring records	Noting no subsequent basin discharge not associated with an over the design event (Passive) discharge event. This was not triggered.	NT
Groundwater Assessment				
17	The Proponent must undertake a detailed groundwater assessment to the satisfaction of the Secretary. This assessment must be:	• Soil and Water Management Plan - February 2019 • Water Balance Assessment • Survey Map 22/04/2025 (Byron Bay Surveying Pty Ltd)	Excavation depths in both the northern and southern pits remained above the thresholds requiring groundwater inflow	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(a) prepared by a suitably qualified expert in consultation with DPIE Water; (b) submitted to the Secretary for approval by 30 December 2018; (c) approved by the Secretary before any extraction below 105 m AHD in the northern pit or below 118.5 m AHD in the southern pit; (d) adequately assess groundwater resources affected by the northern and southern pits, to the proposed full extraction depths of those pits; (e) adequately assess all groundwater impacts associated with proposed extraction; (f) provide data for predicted groundwater pit inflows during and following extraction; and (g) propose management measures to address pit inflows and impacts to groundwater resources. The Proponent must implement the management measures proposed in the groundwater assessment to the satisfaction of the Secretary.		assessment and approval under Schedule 3, Condition 17. The northern pit did not reach 87.5 m AHD based on available information. The southern pit remained above 113 m AHD during the audit period and there was no evidence of extraction for this location during the site inspection. Groundwater management measures remain untriggered. Compliance with Schedule 3, Condition 17 is confirmed.	
Soil and Water Management				
18	If groundwater is encountered during quarrying operations in the South Pit under EA (Mod 1), the Proponent must cease quarrying operations until authorised to recommence by the Secretary.	• DPHI Correspondence on WAL • WAL45172 • Site inspection 19 May 2025	Groundwater has not been encountered in the South Pit during the audit period, and therefore the requirement to cease operations and obtain Secretary authorisation was not triggered. Site inspection confirmed that the southern pit is not subject to any active extraction. Advised by LCC the use of the pit is currently under investigation for use and assessment is currently underway to determine potential water management options related to any discharge from water Management at this pit. Compliance with Schedule 3, Condition 18 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
19	The Proponent must prepare a Soil and Water Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) (a) (b) (c) (d) be prepared by suitably qualified and experienced person/s approved by the Secretary; (b) be prepared in consultation with the EPA and DPIE Water; (c) be submitted to the Secretary for approval within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary; and (d) include a: i. Site Water Balance that includes: • details of: ○ sources and security of water supply; o water use and management on site; ○ any off-site water transfers; and ○ reporting procedures; and ○ measures to be implemented to minimise clean water use on site; ii. Surface Water Management Plan, that includes: • a program for obtaining detailed baseline data on surface water flows and quality in water bodies that could potentially be affected by the project; • a detailed description of the surface water management system on site including the: ○ clean water diversion system; ○ erosion and sediment controls; ○ dirty water management system; and ○ water storages; and • a program to monitor and report on: ○ any surface water discharges; ○ the effectiveness of the water management system, ○ the quality of water discharged from the site to the environment; ○ surface water flows and quality in local watercourses; iii. Groundwater Management Plan that includes: • a provision that requires the Proponent to obtain appropriate water licence(s) to cover the volume of any	• Soil and Water Management Plan (2019) • Weather station monitoring data • Annual Water Balance 2022 • Annual Water Balance 2023 • Annual Water Balance 2024 • Surface water and groundwater quality monitoring records • AEMR 2022 • AEMR 2023 • AEMR 2024 • Water Access Licence WAL45172 • DPHI correspondence on groundwater licensing	Monitoring programs for surface water and groundwater are detailed and aligned with CoA. LCC holds a Water Access Licence (WAL). Non-compliances with the Soil and Water Management Plan occurred during the audit period, however these were notified, actioned and closed out. Groundwater exceedances occurred in 2022 and throughout 2024 and were reported to DPHI with supporting investigations. There are a number of exceedance records related to the data under the AEMR reporting, and monitoring data. Some of these relate to surface water monitoring points SW2 and SW3 related to background water quality conditions. Others relate to SW1. These are discussed in the compliance section of the report in Section 3.2. The currently approved Soil and Water Management plan currently relies on the Water Balance developed at the time of approval. Subsequent water balance verification data developed as part of the reporting differs significantly from the existing water balance and requires an update. Recommendations on the update are provided in Section 3.2. This Non-compliance was identified in a previous AEMR and is required to be reported in the IEA.	NC5

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	unforeseen groundwater inflows into the quarry from the quarry face or floor; and - a monitoring program to manage potential impacts, if any, on any alluvium and associated surface water source near the proposed extraction area that includes: - identification of a methodology for determining threshold water level criteria; - contingency measures in the event of a breach of thresholds; and - a program to regularly report on monitoring. The Proponent must implement the approved Soil and Water Management Plan as approved from time to time by the Secretary.		In relation to the recommendations refer to Table 14 In relation to the non-compliance refer to Table 15 The site continues to implement SWMP measures.	
Transport				
Monitoring of Product Transport				
20	The Proponent must keep accurate records of all laden truck movements to and from the site (including time of arrival and dispatch) and publish a summary of records on its website every 6 months.	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Vehicle exit reports on “Mandalay” records management system sighted during audit on 11 May.	Records of laden truck movements were recorded on site, Records were sighted from Downer for the operation of the Asphalt plant and Blakebrook quarry for the operation of the quarry. This included both laden incoming and outgoing truck movements. The data published on the website was a summary of the laden trucks moving offsite. A discussion on the monitoring is provided in Section 3.2.6. Compliance with Schedule 3, Condition 20 is confirmed.	C
Road Upgrades				
21	The Proponent must undertake the following road upgrade works generally in accordance with the recommendations in the EA, and to the satisfaction of the TfNSW:	- AEMR 2022 - AEMR 2023 - AEMR 2024	All road upgrades required under Condition 21 have been completed, including the CHR-S intersection upgrade, which was finalised during the 2024 reporting period.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(a) upgrade the intersection of the Quarry Access and Nimbin Road to a 'Type AUR Intersection Treatment', prior to 31 December 2010; (b) upgrade the guard rails on the approaches to Boorerie Creek Bridge prior to 31 December 2010; (c) upgrade the Boorerie Creek Road and Nimbin Road intersection to a 'Type BAR Right Turn Treatment on the Through Road' prior to 31 December 2010; (d) upgrade the Wilson Street and Nimbin Road intersection to a 'Type CHR Right Turn Bay Treatment' prior to 31 December 2010; (e) re-align Nimbin Road and the Quarry Access intersection to meet the AUSTROADS sight distance requirements for vehicles travelling in both directions through the intersection prior to 31 December 2011; and (f) upgrade the intersection at Nimbin Road and the Quarry Access from the current Type AUR intersection to a Type CHR-S (Shortened Channelised Right Hand Turn) to the satisfaction of TfNSW. <i>Note: The road works must be constructed in accordance with the relevant TfNSW or AUSTROADS standards, and signposted and lit in accordance with AS:1742 – Manual of Uniform Traffic Control Devices and AS/NZ 1158:2005 – Lighting for Roads and Public Spaces.</i>	- Site inspection (19/05/2025) - Correspondence from LCC referenced in AEMR 2024	Items (a) to (e), including the Type AUR intersection at the Quarry Access and Nimbin Road, guard rail improvements at Boorerie Creek Bridge, Type BAR and Type CHR treatments at relevant intersections, and sight distance realignment works, were completed prior to the current audit period and verified by LCC. The final upgrade, item (f), involving the conversion of the Quarry Access and Nimbin Road intersection from a Type AUR to a Type CHR-S (Shortened Channelised Right Turn) treatment, was completed during the 2024 reporting period. Compliance with Schedule 3, Condition 21 is confirmed.	
Operating conditions				
22	The Proponent must: (a) restrict truck movements from the quarry to an average of 50 laden trucks a day until all road upgrades works required by condition 21 (a) – (e) of Schedule 3, are met or unless otherwise approved by the Secretary; (b) ensure that all laden trucks entering or exiting the site have their loads covered, with the exception of loads consisting solely of boulders greater than one tonne in weight; (c) ensure that all laden trucks exiting the site are cleaned of material that may fall from vehicles, before leaving the site; and	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Traffic Management Plan - Driver induction materials 2022 Independent Audit Report and closeout actions reviewed.	Truck Movement Limits and Road Upgrade Completion The AEMR for 2024 confirms that the road upgrades under Condition 21(a)–(e) were completed prior to the audit period, and the CHR-S upgrade (Condition 21(f)) was completed during the 2024 reporting period. As such, the truck limit of 50 laden trucks/day no longer applied. The AEMRs (2022, 2023 and 2024) confirm that the Traffic Management Plan includes	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(d) use its best endeavours to ensure that appropriate signage is displayed on all trucks used to transport product from the project so they can be easily identified by road users.		operational controls requiring trucks to be covered (unless carrying >1 tonne boulders), cleaned prior to exiting, and display identification signage. A previous non-compliance regarding driver induction material was rectified and is now compliant. Compliance with Schedule 3, Condition 22 is confirmed.	
Traffic Management Plan				
23	The Proponent must prepare a Traffic Management Plan for the project to the satisfaction of the Secretary. This plan must: (a) be prepared in consultation with the TfNSW and Council; (b) be submitted to the Secretary for approval within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary; (c) describe the processes in place for the control of truck movements entering and exiting the site; (d) include a Drivers' Code of Conduct that details the safe and quiet driving practices that must be used by drivers transporting products to and from the quarry; (e) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct; and (f) propose measures to minimise the transmission of dust and tracking of material onto the surface of the public road from vehicles leaving the quarry. The Proponent must implement the approved Traffic Management Plan as approved from time to time by the Secretary.	• AEMR 2022 • AEMR 2023 • AEMR 2024 • Traffic Management Plan (Version 4.2, February 2024)	Compliance with Schedule 3, Condition 23 is confirmed.	C
Aboriginal Heritage				
Aboriginal Heritage Management Plan				
24	The Proponent must prepare an Aboriginal Heritage Management Plan for the project to the satisfaction of the Secretary. The plan must: (a) be prepared by suitably qualified and experienced persons whose appointment has been endorsed by the Secretary	• AEMR 2022 • AEMR 2023 • AEMR 2024	Compliance with Schedule 3, Condition 27 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(b) be prepared in consultation with Heritage NSW and the Registered Aboriginal Parties; (c) be submitted to the Secretary for approval within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary; and (d) include a description of the measures that would be implemented to: - protect, monitor and manage known sites of archaeological significance; - manage any new Aboriginal objects or relics that are discovered; - store Aboriginal heritage items salvaged on site; and - ensure ongoing consultation and involvement of the Registered Aboriginal Parties in the conservation and management of Aboriginal cultural heritage on the site. The Proponent must implement the approved Aboriginal Heritage Management Plan as approved from time to time by the Secretary.	- Aboriginal Heritage Management Plan (Version 4.2) August 2023 - Blackbrook Quarry Environmental Checklist - Approval of AHMP 2023		
25	If any item or object of Aboriginal heritage significance is identified on site, the Proponent must ensure that: (a) all work in the immediate vicinity of the suspected Aboriginal item or object ceases immediately; (b) a 10 m buffer area around the suspected item or object is cordoned off; (c) and the Heritage NSW is contacted immediately. Work in the immediate vicinity of the Aboriginal item or object may only recommence in accordance with the provisions of Part 6 of the National Parks and Wildlife Act 1974.	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Site Interview	This has not been triggered during the audit period	NT
Biodiversity and Rehabilitation Biodiversity Offset Strategy				
25A	The Proponent must: (a) implement the Biodiversity Offset Strategy (see Table 5); (b) ensure that adequate resources are dedicated towards the implementation of this strategy; (c) provide appropriate long term security for the offset area; and	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Biodiversity Offset Strategy 2019 - Approval of revised Rehabilitation Bond 21 Nov 2022	Compliance with Schedule 3, Condition 25A is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status														
	(d) provide a timetable for the implementation of the offset strategy prior to 30 June 2010, or as otherwise agreed by the Secretary, to the satisfaction of the Secretary. <i>Table 5: Biodiversity Offset Strategy</i> <table><tr><th>Offset Areas</th><th>Minimum Size</th></tr><tr><td colspan="2">Government Department of Planning, Industry and Environment</td></tr><tr><td colspan="2">12</td></tr><tr><td colspan="2"></td></tr><tr><td>On-site offset (Protection Zone in Appendix 4)</td><td>17.6 hectares</td></tr><tr><td>Off-site offset (within Lismore local government area, and not already within a conservation area)</td><td>45 hectares</td></tr><tr><td>Total</td><td>62.6 hectares</td></tr></table> <i>Note: Mechanisms to provide appropriate long-term security to the land within the Biodiversity Offset Strategy in accordance with the NSW Biodiversity Offset Policy for Major Projects 2014, include a BioBanking Agreement, Voluntary Conservation Agreement or an alternative mechanism that provides for a similar conservation outcome.</i>	Offset Areas	Minimum Size	Government Department of Planning, Industry and Environment		12				On-site offset (Protection Zone in Appendix 4)	17.6 hectares	Off-site offset (within Lismore local government area, and not already within a conservation area)	45 hectares	Total	62.6 hectares	- Bush Regeneration Plan Monitoring Addendum (July 2019) (Incorporating 45 hectare off-site Biodiversity Offset area) - Bush Regeneration Plan (September 2018)		
Offset Areas	Minimum Size																	
Government Department of Planning, Industry and Environment																		
12																		
On-site offset (Protection Zone in Appendix 4)	17.6 hectares																	
Off-site offset (within Lismore local government area, and not already within a conservation area)	45 hectares																	
Total	62.6 hectares																	
Rehabilitation Objectives																		
26	The Proponent must rehabilitate the site to the satisfaction of the Secretary. This rehabilitation must be generally consistent with the rehabilitation strategy in the EIS and must comply with the objectives in Table 6. <i>Table 6: Rehabilitation Objectives</i> <table><tr><th>Feature</th><th>Objective</th></tr><tr><td>All areas of the site affected by the project</td><td> - Safe - Hydraulically and geotechnically stable - Non-polluting - Fit for the intended post-mining land use(s) - Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land </td></tr><tr><td>Surface Infrastructure</td><td> - Decommissioned and removed, unless otherwise agreed by the Secretary </td></tr><tr><td>Quarry benches and pit floor</td><td> - Landscaped and vegetated using native tree and understorey species </td></tr><tr><td>Final Void</td><td> - Minimise the size, depth and slope of the batters of the final void - Minimise the drainage catchment of the final void </td></tr></table>	Feature	Objective	All areas of the site affected by the project	- Safe - Hydraulically and geotechnically stable - Non-polluting - Fit for the intended post-mining land use(s) - Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land	Surface Infrastructure	Decommissioned and removed, unless otherwise agreed by the Secretary	Quarry benches and pit floor	Landscaped and vegetated using native tree and understorey species	Final Void	- Minimise the size, depth and slope of the batters of the final void - Minimise the drainage catchment of the final void	- Annual Bush Regeneration Report Year 5 2022 - Annual Bush Regeneration Report Year 5 2023 - Annual Bush Regeneration Report Year 5 2024 - Approval of BRMP 14 March 2019 - Blakebrook Quarry Bush Regeneration Plan Monitoring Addendum (July 2019) (Incorporating 45-hectare off-site Biodiversity Offset area) - Bush Regeneration Plan (September 2018)	Compliance with Schedule 3, Condition 26 is confirmed.	C				
Feature	Objective																	
All areas of the site affected by the project	- Safe - Hydraulically and geotechnically stable - Non-polluting - Fit for the intended post-mining land use(s) - Final landform integrated with surrounding natural landforms as far as is reasonable and feasible, and minimising visual impacts when viewed from surrounding land																	
Surface Infrastructure	Decommissioned and removed, unless otherwise agreed by the Secretary																	
Quarry benches and pit floor	Landscaped and vegetated using native tree and understorey species																	
Final Void	- Minimise the size, depth and slope of the batters of the final void - Minimise the drainage catchment of the final void																	
Progressive Rehabilitation																		
27	The Proponent must rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All	- Annual Bush Regeneration Report Year 5 2022 - Annual Bush Regeneration Report Year five 2023	It is noted that the quarry is not at the stage for the rehabilitation of the quarry	C														

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	reasonable and feasible measures must be taken to minimise the total area exposed for dust generation at any time. Interim stabilisation measures must be implemented where reasonable and feasible to control dust emissions in disturbed areas that are not active and which are not ready for final rehabilitation. <i>Note: It is accepted that parts of the site that are progressively rehabilitated may be subject to future re-disturbance.</i>	- Annual Bush Regeneration Report Year five 2024 - Site Interview	site at the current time. Works associated with regeneration relates to the surrounding offset sites at the facility Compliance with Schedule 3, Condition 27 is confirmed.	
Biodiversity and Rehabilitation Management Plan				
28	The Proponent must prepare a Biodiversity and Rehabilitation Management Plan for the project to the satisfaction of the Secretary. This plan must: - be prepared by a suitably qualified expert; (d) (e) (f) (g) (h) (i) be prepared in consultation with BCD and Council; - be submitted to the Secretary for approval within 3 months of the determination of Modification 1, unless otherwise agreed by the Secretary; - provide details of the conceptual final landform and associated land uses for the site; - describe how the implementation of the Biodiversity Offset Strategy will be integrated with the overall rehabilitation of the site; - include a Koala Management Plan prepared in accordance with SEPP 44; - include detailed performance and completion criteria for evaluating the performance of the Biodiversity Offset Strategy and rehabilitation of the site (including progressive rehabilitation), including triggers for any necessary remedial action; - describe the short, medium and long term measures to be implemented to: - manage remnant vegetation and habitat on site, including within the Biodiversity Offset Strategy area; and - ensure compliance with the rehabilitation objectives and progressive rehabilitation obligations in this approval;	- Annual Bush Regeneration Report Year 5 2022 - Annual Bush Regeneration Report Year 5 2023 - Annual Bush Regeneration Report Year 5 2024 - Approval of BRMP 14 March 2019 - Bush Regeneration Plan Monitoring Addendum (July 2019) (Incorporating 45 hectare off-site Biodiversity Offset area) - Bush Regeneration Plan (September 2018) - Site Interview, Bush Regeneration Consultant (Roots Down Pty Ltd)	The site is split up into a number of different zones on the project site it is noted that these zones range in quality of habitat with these being worked through progressively on the project site. The eastern zone was identified as in good condition. It was noted that there is evidence of Koalas in the northern zone rather than in the better habitat to the east. It was noted that the grassland to the south should be reviewed in regard to the progress of vegetation as the natural seed regrowth appears limited in that zone and alternative approaches may need to be taken to achieve the required outcome. It is noted that cattle grazing may impact on rehabilitation in that area. Of note there have been treatments of weed types including Privat and in Zone 4 the Thorney Pea. It is noted that the identified areas in the southern section of the site are recommended as a priority for weed treatment.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(i) include a detailed description of the measures described in paragraph (h) to be implemented over the next 3 years (to be updated for each 3 year period following initial approval of the plan) including the procedures to be implemented for: • maximising the salvage of environmental resources within the approved disturbance area, including tree hollows, vegetative and soil resources, for beneficial reuse in the enhancement of the offset area or site rehabilitation; • restoring and enhancing the quality of native vegetation and fauna habitat in the biodiversity offset and rehabilitation areas through assisted natural regeneration, targeted vegetation establishment and the introduction of fauna habitat features; • protecting vegetation and fauna habitat outside the approved disturbance area on-site, including core Koala habitat; • minimising the impacts on native fauna, including undertaking pre-clearance surveys; • establishing vegetation screening to minimise the visual impacts of the site on surrounding receivers; • ensuring minimal environmental consequences for threatened species, populations and habitats; • collecting and propagating seed; • controlling weeds and feral pests; • controlling erosion; and • managing bushfire risk; (j) include a program to monitor and report on the effectiveness of these measures, and progress against the performance and completion criteria; (k) identify the potential risks to the successful implementation of the Biodiversity Offset Strategy, and include a description of the contingency measures to be implemented to mitigate these risks; (l) and include details of who is responsible for monitoring, reviewing, and implementing the plan. The Proponent must implement the Biodiversity and Rehabilitation Management Plan as approved from time to time by the Secretary.		Compliance with Schedule 3, Condition 28 is confirmed.	

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
Biodiversity and Rehabilitation Bond				
29	Within 6 months of the approval of the Biodiversity and Rehabilitation Management Plan, the Proponent must lodge a Biodiversity and Rehabilitation Bond with the Department to ensure that the Biodiversity Offset Strategy and rehabilitation of the site are implemented in accordance with the performance and completion criteria set out in the plan and the relevant conditions of this approval. The sum of the bond must be determined by: - calculating the full cost of implementing the Biodiversity Offset Strategy; - calculating the cost of rehabilitating all disturbed areas of the site, taking into account the likely surface disturbance over the next 3 years of quarrying operations; - and employing a suitably qualified quantity surveyor or other expert to verify the calculated costs, to the satisfaction of the Secretary. Notes: <i>Alternative funding arrangements for long term management of the Biodiversity Offset Strategy, such as provision of capital and management funding as agreed by BCD as part of a BioBanking Agreement, or transfer to conservation reserve estate can be used to reduce the liability of the Biodiversity and Rehabilitation Bond.</i> <i>If capital and other expenditure required by the Biodiversity and Rehabilitation Management Plan is largely complete, the Secretary may waive the requirement for lodgement of a bond in respect of the remaining expenditure.</i> <i>If the Biodiversity Offset Strategy and/or rehabilitation of the site area are completed (or partially completed) to the satisfaction of the Secretary, then the Secretary will release the bond (or relevant part of the bond). If the Biodiversity Offset Strategy and rehabilitation of the site are not completed to the satisfaction of the Secretary, then the Secretary will call in all or part of the bond, and arrange for the completion of the relevant works.</i>	- Rehab Bond G756086 2023 - DPHI to LCC - Approval of Revised Rehabilitation Bond - 21 Nov 2022 - Approval of BRMP 14 March 2019 - Bush Regeneration Plan Monitoring Addendum (July 2019) (Incorporating 45 hectare off-site Biodiversity Offset area) - Bush Regeneration Plan (September 2018) - Site Interview, Bush Regeneration Consultant (Roots Down Pty Ltd)	Compliance with Schedule 3, Condition 29 is confirmed.	C
30	Within 3 months of each Independent Environmental Audit (see condition 12 of Schedule 5), the Proponent must review, and if	DPHI to LCC - Approval of Revised Rehabilitation Bond - 21 Nov 2022	Completed post previous independent audit.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	necessary revise, the sum of the Biodiversity and Rehabilitation Bond to the satisfaction of the Secretary. This review must consider the: (a) effects of inflation; (b) likely cost of implementing the Biodiversity Offset Strategy and rehabilitating all disturbed areas of the site (taking into account the likely surface disturbance over the next 3 years of the project); (c) and performance of the implementation of the Biodiversity Offset Strategy and rehabilitation of the site to date.		Compliance with Schedule 3, Condition 30 is confirmed.	
Visual				
31	The Proponent must implement all reasonable and feasible measures to minimise the visual and off-site lighting impacts of the project to the satisfaction of the Secretary.	• Complaints register 2022 • Complaints register 2023 • Complaints register 2024 • Sensitive receiver interviews • Community Consultation committee minutes December 2022 • Community Consultation committee minutes February 2023 • Community Consultation committee minutes November 2023 • Community Consultation committee minutes November 2024	No complaints or issues were recorded relating to the project facility over the audit period. Evidence demonstrates compliance with CoA Compliance with Schedule 3, Condition 31 is confirmed.	C
Waste				
32	The Proponent must: (a) manage on-site sewage treatment and disposal in accordance with the requirements of its EPL, and to the satisfaction of the EPA and Council; (b) minimise the waste generated by the project; (c) ensure that the waste generated by the project is appropriately stored, handled, and disposed of; (d) and report on waste management and minimisation in the Annual Review, to the satisfaction of the Secretary.	• AEMR 2022 • AEMR 2023 • AEMR 2024 • Site Interview LCC • Plumbing inspection report dated 27/02/2024	The site on-site sewage is inspected by plumbing contractors regularly. Waste generated by the quarry is separated into general waste and recyclables and collected by LCC 'standard' waste collection service weekly; • Any asphalt product generated from plant startup/ shutdown is reprocessed into product designs to be reused and sold; • Chemicals drums/containers are stored in the Dangerous Goods Package Store until transported to the	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
			Wyrallah Road Waste Management Facility by Quarry staff in a light vehicle; and - Gross pollutant trap capturing the runoff from the truck washdown, and refuelling area is inspected regularly and pumped every six months or as needed. - A local company specialising in liquid waste removal is engaged to remove contents via pumping to their truck and subsequent disposal at LCC Wastewater Treatment Plant. Compliance with Schedule 3, Condition 32 is confirmed.	
33	Except as expressly permitted in an EPL, the Proponent must not receive waste at the site for storage, treatment, processing, reprocessing or disposal.	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Site interview Asphalt plant (19/05/2025) - Site interview LCC (19/05/2025)	Waste is not received at the site for storage, treatment processing or reprocessing. Off specification asphalt from the sites asphalt batching plant is stored on site and incorporated back into the asphalt batching process. This material is from the operation of the Batch Plant on site only and has not previously used as an engineering material (I.e. the material has not been reclaimed from road operations). As such this material does not meet the applicable definition under the waste recovery order and this does not apply to this material. No other materials are received to site. Compliance with Schedule 3, Condition 33 is confirmed.	C
Liquid Storage				

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
34	The Proponent must ensure that all tanks and similar storage facilities (other than for water) are protected by appropriate bunding or other containment, in accordance with the relevant Australian Standards.	- Site inspection (19/05/2025) - LCC interview (19/05/2025)	A site inspection was undertaken of the storage facilities at site which are bunded. There is also bunding around the fuel storage point for drips etc when decanting. There is a decommissioned storage tank in the asphalt plant area on site. It was raised to bring this back inside the bunding for the site as although this has been decommissioned residual material may remain. Compliance with Schedule 3, Condition 34 is confirmed.	C
Dangerous Goods				
35	The Proponent must ensure that the storage, handling, and transport of dangerous goods is done in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.	- Site inspection (19/05/2025) - LCC interview (19/05/2025)	Compliance with Schedule 3, Condition 35 is confirmed.	C
Bushfire				
36	The Proponent must: (a) ensure that the project is suitably equipped to respond to any fires on site; and (b) assist the Rural Fire Service and emergency services to the extent practicable if there is a fire in the vicinity of the site.	- PIRMP (March 2021) - Induction records - AEMR 2022, 2023, 2024	Compliance with Schedule 3, Condition 36 is confirmed.	C
SCHEDULE 4 – ADDITIONAL PROCEDURES				
Notification of Landowners				
1	As soon as practicable, and no longer than 7 days, after obtaining monitoring results showing: a. an exceedance of any criteria in Schedule 3, the Proponent must notify the affected landowners in writing of the exceedance, and provide regular monitoring results, at least	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Incident reports	Although the non-compliance reporting has been generally completed for the site there are a number of separate exceedances associated with meeting the 7-day reporting timeframes relevant to the incidents of noncompliance.	NC4

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	every 3 months, to each affected landowner until the project is again complying with the relevant criteria; and (b) an exceedance of any air quality criteria in Schedule 3, the Proponent must send a copy of the NSW Health fact sheet entitled "Mine Dust and You" (as may be updated from time to time) to the affected landowners and current tenants of the land (including the tenants of land which is not privately-owned).	- Air quality monitoring data - Surface water quality monitoring data	Additionally, there are a number of exceedances associate with a misinterpretation of the air quality monitoring data for the site. These are presented in Table 12. This represents a non-compliance with Schedule 4, Condition 1. Relevant recommendations are provided in Table 14	
Independent Review				
2	If an owner of privately-owned land considers the project 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 project 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 Proponent 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 project is complying with the relevant criteria in Schedule 3; and - if the project is not complying with these criteria, then identify 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; (c) and comply with any written requests made by the Secretary to implement any findings of the review.	Records or documents reviewed: - AEMR 2022 - AEMR 2023 - AEMR 2024	Compliance with Schedule 4, Condition 2 is confirmed.	NT
Property Inspections				
3	Prior to 30 June 2010, the Proponent must advise all owners of privately-owned land within 2 kilometres of proposed blasting	All notifications and associated inspections required by this condition were completed prior to this audit period.	Compliance with Schedule 4, Condition 3 is confirmed.	NT

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	activities, and any other landowner nominated by the Secretary, that they are entitled to a property inspection to establish the baseline condition of the property.			
4	if the Proponent receives a written request for a property inspection from any such landowner, the Proponent must: (a) commission a suitably qualified person, whose appointment has been approved by Secretary, to inspect and report on the condition of any building or structure on the land, and recommend measures to mitigate any potential blasting impacts; and (b) give the landowner a copy of this property inspection report. <i>Note: It is preferable for the property inspection to be carried out prior to the commencement of blasting activities on the site, and the Proponent should facilitate this occurring wherever possible.</i>	Not Triggered	Compliance with Schedule 4, Condition 4 is confirmed.	NT
5	If any owner of privately-owned land within 2 kilometres of proposed blasting activities, or any other landowner nominated by the Secretary, claims that his/her property, including vibration-sensitive infrastructure such as water supply or underground irrigation mains, has been damaged as a result of blasting at the project, the Proponent shall within 3 months of receiving this request: (a) commission a suitably qualified person whose appointment has been approved by the Secretary to investigate the claim and prepare a property investigation report; and (b) give the landowner a copy of the report. If this independent investigation confirms the landowner's claim, and both parties agree with these findings, then the Proponent shall repair the damage to the satisfaction of the Secretary. If the Proponent or landowner disagrees with the findings of the independent property investigation, then either party may refer the matter to the Secretary for resolution.	Not Triggered	Compliance with Schedule 4, Condition 5 is confirmed.	NT
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, REPORTING AND AUDITING				
Environmental Management Strategy				

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
1	The Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must: (a) be submitted to the Secretary for approval within 6 months of the Secretary requiring preparation of the strategy by notice to the Proponent; (b) provide the strategic framework for environmental management of the project; (c) identify the statutory approvals that apply to the project; (d) describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the project; (e) describe the procedures to be implemented to: • keep the local community and relevant agencies informed about the operation and environmental performance of the project; • receive, record, handle and respond to complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; • respond to emergencies; and (f) include: • copies of any strategies, plans and programs approved under the conditions of this approval; and • a clear plan depicting all the monitoring to be carried out under the conditions of this approval. The Proponent must implement any Environmental Management Strategy as approved from time to time by the Secretary.	• Environmental Management Strategy v4.3MS – approved by DPHI (2/02/2024) • AEMR 2022 • AEMR 2023 • AEMR 2024	Compliance with Schedule 5, Condition 1 is confirmed.	C
Evidence of Consultation				
2	Where consultation with any State or local agency is required by the conditions of this approval, the Proponent must: (a) consult with the relevant agency prior to submitting the required document to the Secretary for approval; (b) submit evidence of this consultation as part of the relevant document;	Records or documents reviewed: • AEMR 2022 • AEMR 2023, 2024 • OOHW protocol, 3.2, 3.3 DPHI approvals • OOHW protocol 3.4 and 3.5 DPHI approvals • OOHW protocol 3.6, April 2025 to July 2025.	Compliance with Schedule 5, Condition 2 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(c) describe how matters raised by the agency have been addressed and any matters not resolved; (d) and include details of any outstanding issues raised by the agency and an explanation of disagreement between any agency and the Proponent.	• Environmental Management Strategy v4.3-Jan 2024 • Approval from DPHI of Environmental Management Strategy v4.3MS 2/02/2024 • Air Quality Management Plan- September 2023 • Noise and Blast Management Plan - August 2022 • Aboriginal Heritage Management Plan - August 2023 • Operational Traffic Management Plan - Feb 2024 • Blakebrook Quarry – Objectives and Targets Review Form – 18 January 2022 • Blakebrook Quarry – Management Review Meeting Minutes – 4 August 2022 • Blakebrook Quarry – Objectives and Targets Review Form – 4 August 2022 • Blakebrook Quarry – Objectives and Targets Review Form – January 2023 • Blakebrook Quarry – Management Review Meeting Minutes – 18 January 2023 • Blakebrook Quarry – Objectives and Targets Review Form – 19 July 2023 • Blakebrook Quarry – Management Review Meeting Minutes – 19 July 2023 • Blakebrook Quarry – Management Review Meeting Minutes – 24 January 2024 • Blakebrook Quarry – Objectives and Targets Review Form – 31 January 2024 • Blakebrook Quarry – Management Review Meeting Minutes – 31 January 2024 • Blakebrook Quarry – Management Review Meeting Minutes – 30 July 2024 • Blakebrook Quarry – Objectives and Targets Review Form – 30 July 2024		
Management Plan Requirements				

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
3	The Proponent 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 project or any management measures; (c) a description of the measures that to 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 project; and - effectiveness of any management measures (see (c) above); (e) a contingency plan to manage any unpredicted impacts and their consequences and to ensure that ongoing impacts reduce to levels below relevant impact assessment criteria as quickly as possible; (f) a program to investigate and implement ways to improve the environmental performance of the project 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: The Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</i>	Records or documents reviewed: - Environmental Management Strategy v4.3-Jan 2024 - Approval from DPHI of Environmental Management Strategy v4.3MS 2/02/2024 - Air Quality Management Plan- September 2023 - Noise and Blast Management Plan - August 2022 - Aboriginal Heritage Management Plan - August 2023 - Operational Traffic Management Plan - Feb 2024 - AEMR 2022, 2023, 2024 - Blakebrook Quarry – Objectives and Targets Review Form – 18 January 2022 - Blakebrook Quarry – Management Review Meeting Minutes – 4 August 2022 - Blakebrook Quarry – Objectives and Targets Review Form – 4 August 2022 - Blakebrook Quarry – Objectives and Targets Review Form – January 2023 - Blakebrook Quarry – Management Review Meeting Minutes – 18 January 2023 - Blakebrook Quarry – Objectives and Targets Review Form – 19 July 2023 - Blakebrook Quarry – Management Review Meeting Minutes – 19 July 2023 - Blakebrook Quarry – Management Review Meeting Minutes – 24 January 2024 - Blakebrook Quarry – Objectives and Targets Review Form – 31 January 2024 - Blakebrook Quarry – Management Review Meeting Minutes – 31 January 2024 - Blakebrook Quarry – Management Review Meeting Minutes – 30 July 2024 - Blakebrook Quarry – Objectives and Targets Review Form – 30 July 2024	Compliance with Schedule 5, Condition 3 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
Application of Existing Management Plans				
4	The Proponent must continue to apply existing approved management plans, strategies or monitoring programs that have most recently been approved under this approval, until the approval of a similar plan, strategy or program under this approval.	Records or documents reviewed: • Environmental Management Strategy v4.3-Jan 2024 • Approval from DPHI of Environmental Management Strategy v4.3MS 2/02/2024 • Air Quality Management Plan- September 2023 • Noise and Blast Management Plan - August 2022 • Aboriginal Heritage Management Plan - August 2023 • Operational Traffic Management Plan - Feb 2024 • AEMR 2022 • AEMR 2023 • AEMR 2024	Compliance with Schedule 5, Condition 4 is confirmed.	C
Revision of Strategies, Plans and Programs				
4a	Within 3 months of the submission of an: (a) incident report under condition 9 below; (b) Annual Review under condition 11 below; (c) audit report under condition 12 below; (d) and any modifications to this approval the Proponent must review the strategies, plans and programs required under this approval, to the satisfaction of the Secretary. The proponent must notify the Department in writing of any such review being undertaken. Where this review leads to revisions in any such document, then within 6 weeks of the review the revised document must be submitted for the approval of the Secretary. <i>Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the project.</i>	Notification to be verified.	Compliance with Schedule 5, Condition 4a is confirmed	C
Upgrading and Staging of Strategies, Plans or Programs				
5	To ensure that strategies, plans or programs required under this approval are updated on a regular basis, and that they incorporate any appropriate additional measures to improve the	Records or documents reviewed: • Management Review Meeting Minutes 18/01/2022; 4/08/2022; 24/01/2023; 31/01/2024; 30/07/2024)	Compliance with Schedule 5, Condition 5 is confirmed	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	environmental performance of the project, the Proponent may at any time submit revised strategies, plans or programs for the approval of the Secretary. With the agreement of the Secretary, the Proponent may also submit any strategy, plan or program required by this approval on a staged basis. The Secretary may approve a revised strategy, plan or program required under this approval, or the staged submission of any of these documents, at any time. With the agreement of the Secretary, the Proponent may prepare the revised or staged strategy, plan or program without undertaking consultation with all parties nominated under the applicable condition in this approval. While any strategy, plan or program may be submitted on a staged basis, the proponent will need to ensure that the operations associated with the project are covered by suitable strategies, plans or programs at all times. If the submission of any strategy, plan or program is to be staged; then the relevant strategy, plan or program must clearly describe the specific stage/s of the project to which the strategy, plan or program applies; the relationship of this stage/s to any future stages; and the trigger for updating the strategy, plan or program.	- Environmental Management Strategy v4.3-Jan 2024 - Approval from DPHI of Environmental Management Strategy v4.3MS 2/02/2024 - Air Quality Management Plan- September 2023 - Noise and Blast Management Plan - August 2022 - Aboriginal Heritage Management Plan - August 2023 - Operational Traffic Management Plan - Feb 2024		
Adaptive Management				
6	The Applicant must assess and manage development-related risks to ensure that there are no exceedances of the criteria and performance measures in this consent. Any exceedance of these criteria or performance measures constitutes a breach of this consent and may be subject to penalty or offence provisions under the EP&A Act or EP&A Regulation. Where any exceedance of these criteria or performance measures has occurred, the Applicant must, at the earliest opportunity: (a) take all reasonable and feasible steps to ensure that the exceedance ceases and does not recur; (b) consider all reasonable and feasible options for remediation (where relevant) and submit a report to the Department	Records or documents reviewed: - Register - EMS Environment and QMS Quality Risk Assessment - Blakebrook Quarry revision 13 (April 2025) - Management Review Meeting Minutes 18/01/2022; 4/08/2022; 24/01/2023; 31/01/2024; 30/07/2024) - AEMR 2022 - AEMR 2023 - AEMR 2024 As per Schedule 4, CoAs 1 and 2, notifications provided to landholders and government agencies re dust and blast matters: 26 Oct 2023: Letter LCC to DPHI non-compliance notification	Compliance with Schedule 5, Condition 6 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	describing those options and any preferred remediation measures or other course of action; (c) and implement reasonable remediation measures as directed by the Planning Secretary.	• Nov 2023: Dust Exceedance Report ED23/55183 • 2 Nov 2023: Email LCC to EPA – submission of non-compliance • 2 Nov 2023: Email LCC to landowner of [REDACTED] Booerie Creek Rd • 23 Jan 2024: Email LCC (Compliance) to LCC (Records) dust exceedance at dust monitoring location D3 (on privately owned property at [REDACTED] Booerie Ck Rd) • 23 Jan 2024: Email LCC to landowner at [REDACTED] Booerie Creek Rd • Jan 2024: Dust Exceedance Report ED24/3072 • 30 Jan 2024: Email DPHI to LCC (Compliance) acknowledgement of Dust Exceedance Notification • 19 Feb 2024: Email LCC (Compliance) to LCC (Records) dust exceedance at dust monitoring location D3 (on privately owned property at [REDACTED] Booerie Ck Rd). • 19 Feb 2024: Email LCC to Landowner at [REDACTED] Booerie Ck Rd notifying of exceedance • Feb 2024: Dust Exceedance Report ED24/6635 • 22 Feb 2024: Email DPHI to LCC (Compliance) acknowledgement of Dust Exceedance Notification • 29 Jul 2024: Email LCC (Compliance) to LCC (Records) Dust exceedance at dust monitoring location D3 (on privately owned property at [REDACTED] Nimbin Rd). • 29 Jul 2024: Letter LCC to landowner advising of exceedance at [REDACTED] Nimbin Rd • Jul 2024: Dust Exceedance Report ED24/28637 • 4 Sep 2024: Email DPHI LCC (Compliance) acknowledgement of Dust Exceedance Notification • 13 Nov 2024: Email LCC to DPHI Dust Exceedance Report for October discussion. • Dec 2024: Dust exceedance report (ED24/47827) • 2 Dec 2024: Email LCC to landowner at [REDACTED] Booerie Creek Rd notifying of exceedance • 9 Dec 2024: Email DPHI to LCC (Compliance) acknowledgement of Dust Exceedance Notification		

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
Community Consultative Committee				
7	The Proponent must establish and operate a Community Consultative Committee (CCC) for the project to the satisfaction of the Secretary. The CCC must be operated in general accordance with the Department's Community Consultative Committee Guidelines, November 2016 (or later version). <i>Notes:</i> <i>The CCC is an advisory committee. The Department and other relevant agencies are responsible for ensuring that the Proponent complies with this approval.</i> <i>In accordance with the guidelines, the Committee should comprise an independent chair and appropriate representation from the Proponent, Council and the local community.</i>	Minutes of NRQ Community Consultative Committee Meetings 1/12/2022 16/02/2023 30/11/2023 28/11/2024 MSS consulted with the CCC to obtain its input into the scope of the audit (8/05/2025)	Compliance with Schedule 5, Condition 7 is confirmed.	C
Reporting and Auditing				
Incident Notification				
8	The Proponent must immediately notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing via the Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Interview with auditees 19/05/2025 - Management Review Meeting Minutes 18/01/2022; 4/08/2022; 24/01/2023; 31/01/2024; 30/07/2024)	Compliance with Schedule 5, Condition 8 is confirmed.	C
Non-compliance Notification				
9	Within seven days of becoming aware of a non-compliance, the Applicant must notify the Department of the non-compliance. The notification must be in writing via the Major Projects Website and identify the development (including the development application number and name), set out the condition of this consent that the development is non-compliant with, the way in which it does not comply and the reasons for the non-compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.	- AEMR 2022 - AEMR 2023 - AEMR 2024 - Interviews with auditees (19/05/2025) - Management Review Meeting Minutes 18/01/2022; 4/08/2022; 24/01/2023; 31/01/2024; 30/07/2024)	Compliance with Schedule 5, Condition 9 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
Regular Reporting				
10	The Proponent must provide regular reporting on the environmental performance of the project on its website, in accordance with the reporting arrangements in any plans or programs approved under the conditions of this approval.	• AEMR 2022 • AEMR 2023 • AEMR 2024 • Interviews with auditees (19/05/2025) • Northern Rivers Quarry Lismore City Council website	Compliance with Schedule 5, Condition 10 is confirmed.	C
Annual Review				
11	By the end of March each year, or other timing as may be agreed by the Secretary, the Proponent must submit a review to the Department reviewing the environmental performance of the project to the satisfaction of the Secretary. This review must: (a) describe the project (including any progressive rehabilitation) that was carried out in the previous calendar year, and the project that is proposed to be carried out over the current calendar year; (b) include a comprehensive review of the monitoring results and complaints records of the project over the previous calendar year, which includes a comparison of these results against the: • relevant statutory requirements, limits or performance measures/criteria; • requirements of any plan or program required under this approval; • monitoring results of previous years; and • relevant predictions in the documents listed in condition 2(a) of Schedule 2; (c) evaluate and report on: • the effectiveness of the air quality and noise management systems; and • compliance with the performance measures, criteria and operating conditions in this approval.	• AEMR 2022, 2023, 2024 were submitted to DPHI within the required timeframe.	Compliance with Schedule 5, Condition 11 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(d) identify any non-compliance over the past calendar year, and describe what actions were (or are being) taken to ensure compliance; (e) identify any trends in the monitoring data over the life of the project; (f) identify any discrepancies between the predicted and actual impacts of the project, and analyse the potential cause of any significant discrepancies; (g) describe what measures will be implemented over the current calendar year to improve the environmental performance of the project. The Proponent must ensure that copies of the Annual Review are submitted to Council and are available to the Community Consultative Committee (see condition 7 of Schedule 5) and any interested person upon request.			
Independent Environmental Audit				
12	Within three years of the date of grant of this project approval, and every 3 years thereafter, unless the Secretary directs otherwise, the Proponent must commission, commence and pay the full cost of an Independent Environmental Audit of the project. This audit must: (a) be led and conducted by a suitably qualified, experienced and independent team of experts whose appointment has been endorsed by the Secretary; (b) include consultation with the relevant agencies and the CCC; (c) assess the environmental performance of the project and whether it is complying with the relevant requirements in this approval and any relevant EPL or necessary water licences for the project (including any assessment, strategy, plan or program required under these approvals); (d) review the adequacy of strategies, plans or programs required under the abovementioned approvals; (e) recommend appropriate measures or actions to improve the environmental performance of the project, and/or any assessment, strategy, plan or program required under the abovementioned approvals;	• AEMR 2022 • AEMR 2023 • AEMR 2024 • The latest Independent Environmental Audit was submitted in 2022 • Letter of approval endorsing David McLean as the Lead Auditor (29/04/2025) • MSS consulted with DPHI to obtain its input into the scope of the audit and confirmation on stakeholders to be consulted (8/05/2025) • MSS consulted with the CCC to obtain its input into the scope of the audit (8/05/2025) • MSS consulted with LCC to discuss Post Approval Requirements and expectations of DPHI prior to commencement of audit (30/04/2025)	Compliance with Schedule 5, Condition 12 is confirmed.	C

Unique ID	Requirement	Evidence collected	Audit Findings and Recommendations	Compliance Status
	(f) and be conducted and reported to the satisfaction of the Secretary.			
13	Within 12 weeks of commencing this audit, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary and any other NSW agency that requests it, together with its response to any recommendations contained in the audit report, and a timetable for the implementation of these recommendations as required. The Proponent must implement these recommendations, to the satisfaction of the Secretary.	• AEMR 2022 • AEMR 2023 • AEMR 2024 • Independent Environmental Audit was submitted in 2022	Not Triggered this report	NT
Access to Information				
14	Within 3 months of the determination of Modification 1, until the completion of all works, including rehabilitation and remediation the Proponent must: (a) make the following information publicly available on its website: • the documents listed in condition 2(a) of Schedule 2; • current statutory approvals for the project; • all approved strategies, plans and programs required under the conditions of this approval; • a comprehensive summary of the monitoring results of the project, reported in accordance with the specifications in any conditions of this approval, or any approved plans and programs; • a complaints register, updated monthly; • the annual reviews of the project; • any independent environmental audit as described in condition 12 above, and the Proponent'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.	• AEMR 2022 • AEMR 2023 • AEMR 2024 • Interviews with Auditees (19/05/2025) • Complaints Register current to end of December 2024 • All documents relevant to this condition are listed on the website Northern Rivers Quarry Lismore City Council	Compliance with Schedule 5, Condition 14 is confirmed.	C

Department of Planning, Housing and Infrastructure



NSW Planning Ref: MP07_0020-PA-111

Lismore City Council
c/o: [REDACTED]
Operational Compliance Coordinator
60 Brunswick Street
LISMORE NSW 2480

29/04/2025

Sent via the Major Projects Portal only

Subject: Blakebrook Quarry - Auditors Request for Independent Environmental Audit

Dear [REDACTED]

Reference is made to your post approval matter, MP07_0020-PA-111, request for the Planning Secretary's approval of suitably qualified, experienced, and independent person to conduct an Independent Environmental Audit of Blakebrook Quarry, submitted as required by Schedule 5, Condition 12 of MP07_0020 as modified ("**the approval**") to NSW Department of Planning, Housing and Infrastructure ("**NSW Planning**") on 10 April 2025.

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

In accordance with Schedule 5, Condition 12 of the Approval and the NSW Planning, *Independent Audit Post Approval Requirements* (2020), as nominee of the Planning Secretary, I endorse the following independent audit team:

- Mr David McLean – Lead Auditor.

Please ensure this correspondence is appended to the Independent Audit Report.

The Independent Environmental Audit must be prepared, undertaken, and finalised in accordance with the conditions of the Approval, and it is recommended that audit be undertaken implementing the current *Independent Audit Post Approval Requirements* (2020). Failure to meet these requirements will require revision and resubmission of the Audit Report.

NSW Planning reserves the right to request an alternate auditor or audit team for future audits.

The Lead Auditor must attend the site inspections.

Should you wish to discuss the matter further, please contact [REDACTED] (Senior Compliance Officer) on (02) 6670 8657 or email compliance@planning.nsw.gov.au.

Department of Planning, Housing and Infrastructure



Yours sincerely



Team Leader – Far North Region
Compliance

As nominee of the Planning Secretary

Appendix D Photos from Inspection

Observations from the site inspection are provided in Table 18. The Auditor was escorted around the site by Project personnel who made themselves available for this purpose.

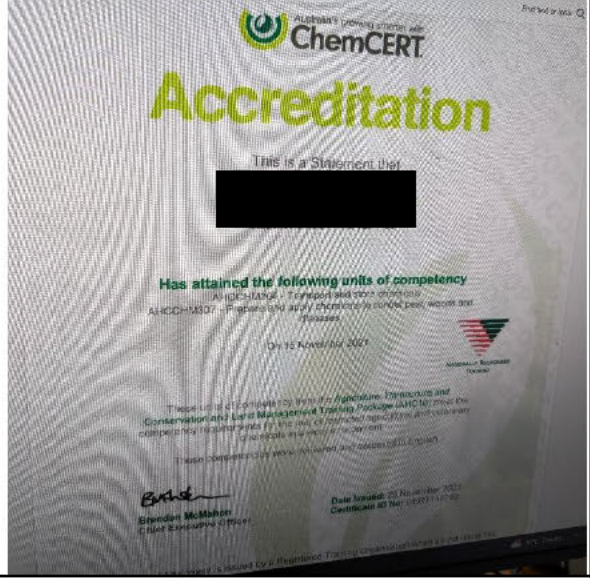
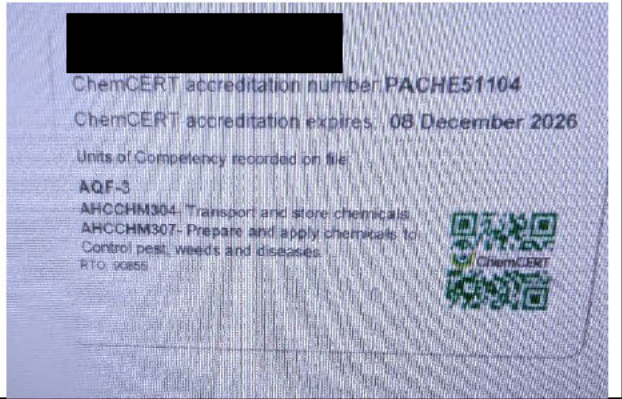
Table 18: Site inspection photographs

No.	Comment	Photograph
01	SB1 basin with 3-inch pump set up for dewatering to a watercart. Water was then transferred to SB3 and released into the basin area.	
02	The MX80 asphalt plant aggregate supply bay for asphalt manufacturing.	
03	MX80 asphalt plant in operation at the project site. Material bays for the mix design related to the asphalt mix.	

No.	Comment	Photograph
		
04	Basin marker in SB1. Basin was close to capacity. The designed overflow point from the basin is at the back of the photo and is overgrown with vegetation. For management of the basins there is currently in place loggers for the site that track water volumes in the basin. Recommendation: This information along with the height marker for the basin capacity (required volume for an empty basin) should be utilised to confirm that the basin has achieved the required 5-day operational basin capacity post rainfall. This should also be recorded once this has been achieved for the site related to rainfall events received. It may be that this is confirmed through record keeping or alternately through the logger records.	

No.	Comment	Photograph
05	Basin overflow point for SB1.	
06	Full basin at SB2 with height marker in the background.	

No.	Comment	Photograph
07	Outlet from SB2 at the southern end of the asphalt batch plant has had the connecting drain included in the Soil and Water Management Plan blocked off preventing discharge from this basin back to SB2. It was advised that in the event of SB2 filling to capacity it would be pumped across to SB1 and then utilised on site for dust suppression or released to SB3. Recommendation: It is recommended that the connection between SB1 and SB2 is reinstated as per the current management plan, or an operational procedure is developed for the purpose of transfer of water from SB2 to SB1 is prepared to facilitate dewatering. Recommendation: It was noted that there is a decommissioned tank at the rear of the asphalt plant siting outside the bund material. This should be relocated back inside the bund. Recommendation: It is also recommended that the rubbish on the backside of the bund (geofabric and other loose materials is removed and disposed of).	
08	Basin SB3 overtopping back into the northern pit work area.	

No.	Comment	Photograph
09	██████████ confirmed there was periodic weed treatment on site to manage weed encroachment. Certificates for both ██████████ where sighted during the audit. Of note the site team do not maintain records of weed treatment undertaken by the site team. Recommendation: records are kept of weed treatment undertaken on site in accordance with the Chemical Usage (Agricultural and Veterinary) Control Regulation 2017.	
10	Chem Cert ██████████	
11	Crushing and screening operation in progress. Advised that dust suppression sprayers are not in operation for the equipment. If needed hoses can be utilised to minimise dust generation from the material.	

No.	Comment	Photograph
12	Crushing and screening operation in progress, loader and other crusher in operation. Different grades of aggregate are stored on the northern pits floor for sale and use in road and asphalt construction.	
13	Fuel storage and refuelling area with cold mix bunding preventing drips from the storage.	
14	Groundwater bores BQN1 at the northern section of the northeastern side of the northern Pit. Three bores noted in place at the site.	

No.	Comment	Photograph
15	Off spec asphalt product stored as RAP on the project site. Of note the estimated volume is approximately 5,000 cubic metres. The material does not constitute a waste under the POEO Act order or exemption as the material has not be utilised in engineering works (i.e. utilised within the road or an engineered structure). The product however is not tracked when returning to the site. Recommendation: the transport of the off-spec asphalt back to the quarry has not been recorded for the site. This should be considered for recording in the truck volumes.	
16	New asphalt plant (Ammann ContiQuick 140). The plant is yet to be commissioned for the site and is a more recent and better suited asphalt with a lower capacity but more efficient production capability than the MX-80 plant.	
17	New asphalt plant transfer conveyor to truck loading facility. This is not currently commissioned for the site.	

No.	Comment	Photograph
18	New fuel storage for the new asphalt plant. Although not commissioned the fuel storage has internal bunding for the operation of the plant.	
19	New truck loading facility from the Asphalt plant.	
20	Northern pit area adjacent SB3, northern void with captured water within this area.	

No.	Comment	Photograph
21	Northern pit floor.	
22	Northern sediment basin 1.	
23	Northern sediment basin.	
24	Production operations.	
25	RAP storage northern pit.	

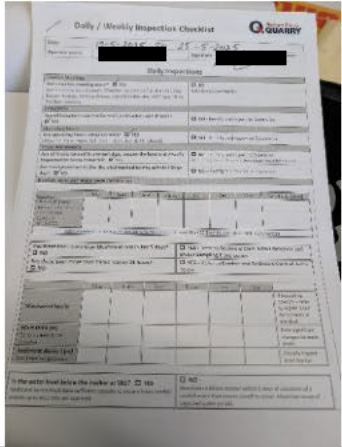
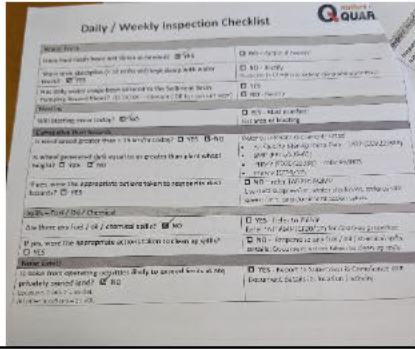
No.	Comment	Photograph
26	Rear bund looking from basin overflow.	
27	Rockface north pit.	
28	Rockface north pit.	

No.	Comment	Photograph
29	Rockface north pit.	
30	Rockface north pit.	
31	South pit looking to the northern pit.	
32	Southern pit looking south towards outlet area of LPD3.	

No.	Comment	Photograph
33	Southern pit dam view of water filled void.	
34	Southern pit dam (Looking towards LPD3).	
35	Southern pit flow north pit (Northeast flow direction).	

No.	Comment	Photograph
36	Southern pit flow north pit (Northeast flow direction).	
37	SW1 creek flow during audit at under road culvert.	
38	SW1 creek flow during audit looking back upstream from the site.	

No.	Comment	Photograph
39	Testing lab facility adjacent the asphalt plant for material management, compliance and testing.	
40	Testing lab.	
41	Trommel operation at the quarry site for materials production associated with road construction.	
42	Vehicle movement plan for the asphalt operations associated with the site distribution.	

No.	Comment	Photograph
43	Weekly inspection form page 1.	
44	Weekly inspection form page 2.	
45	Weekly inspection form page 3.	