



**Hitchcock Road Sand Extraction and
Rehabilitation Project
PA 06_0104**

**Independent Environmental Audit
Action Plan**

September 2020

Prepared By:

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Introduction

In accordance with Schedule 5, condition 6 of the Project Approval PF Formation are required to commission an Independent Environmental Audit every three years.

The Department of Planning, Industry and Environment approved RPS Group on 15 June 2020 to undertake the audit. The IEA covers the reporting period from April 2017 to 25 June 2020.

This action plan has been developed in accordance with the *Independent Audit – Post Approval Requirements (Department of Planning Industry, and Environment, 2018)*.

Table 1 - Response to Recommended Actions for Non-compliances under PA 06_0104

Item	Reference	Non -compliance	Recommended Action	Time Frame for Completion	Response to Recommendations
1.	Schedule 2 Condition 2	The development is generally being carried out in accordance with the EIS and with the conditions of development consent, however a number of non-compliances were identified.	Recommendations are provided against the specific conditions below.	See below	Noted. See below response to recommendations of non-compliances.
2.	Schedule 3 Condition 1	Extraction boundaries had previously been marked with star pickets, however during the 2020 site inspection it was observed that these boundaries were not clearly identified in some areas.	Extraction boundary markers should be reviewed, provided with clear signage, and updated and maintained to be permanent markers.	3 months	Agreed. Extraction boundary markers have been disturbed in certain areas where rehabilitation has taken place however no extraction has occurred outside the approved areas. Permanent galvanised star pickets will be installed with signage along the extraction boundary by 14th November 2020
3.	Schedule 3 Condition 18	During the site inspection, sediment fences on the southern boundary of the pit 14 tailings dam were observed overloaded with sediment and were damaged in areas.	Sediment fences are to be cleaned out regularly to ensure they maintain their integrity and should form part of regular inspection and maintenance.	1 month	Agreed. All sediment fences will be cleaned and reinstated as necessary by 14th September 2020.
4.	Schedule 3 Condition 23	The Landscape Management Plan references the offset strategy for the site, however there was no evidence available to confirm these arrangements have been implemented to the satisfaction of the Director-General. A revised Offset Strategy is currently being prepared as part of an application for a consent modification.	A revised Offset Strategy should be prepared and implemented as soon as practicable that is consistent with current offsetting requirements in NSW.	6 months	Agreed. A Modification Report has been submitted for proposed modifications to the Hitchcock Road Quarry-Mod-1 (MP06_0104-Mod-1) A revised Offset Strategy is included in the Modification report and preliminary discussions with DPIE planners has indicated the revised Offset Strategy will be acceptable to DPIE. The Landscape Management Plan will be updated following the modification application being determined by DPIE.

Table 2 - Response to Opportunities for Improvement Recommendations

Item	Recommended Action - Opportunities for Improvements	Response
1	Regular inspection and maintenance of screen plantings where required.	Regular inspections of screen plantings are carried by PF Formation’s project Senior Ecologist.
2	Undertake infill plantings in rehabilitated areas.	Infill plantings will be carried out as required and if directed by the project Senior Ecologist overseeing the rehabilitation on site.
3	Undertake monitoring of rehabilitated areas every 2 years to monitor success.	Monitoring of rehabilitation will be carried out as recommended by Senior Ecologist overseeing the rehabilitation works on site. The rehabilitation progress is exceptional, PF Formation do not consider it necessary to change rehabilitation monitoring unless advised by project Senior Ecologist.
4	Undertake annual LIDAR mapping to provide pit survey information.	Annual LIDAR mapping is not considered necessary by PF Formation. Pit surveys are carried out as required from surveyed RL Markers and benchmarks. The site operates under an approved Pit Shell Plan which includes maximum extraction depth contours in the extraction areas.
5	Undertake regular weed control throughout rehabilitated areas.	Weed control is ongoing.
6	Undertake regular inspection and cleaning of site access to ensure any tracked materials are removed.	A mechanical road sweeper and water cart with forwards spray controls is maintained and deployed as necessary. Inspections of the site access are carried out on a daily basis.
7	Undertake monthly inspection of erosion and sediment control structures.	Monthly inspections do occur, sediment fencing will be inspected more thoroughly throughout these inspections in the future.
8	One of the main areas for improvement is to regularly update the EMS and management plans. Regular updating of these documents allows the operator to improve environmental performance and respond to operational changes proactively. The EMS and management plans were proposed to be updated during the 2019-2020 AEMR reporting period, however that period has now passed. These documents should be reviewed and updated as a priority.	The Environmental Management Strategy and management plans will be reviewed and updated following this audit and determination of the Modification Application (MP06_0104-Mod-1)
9	Following the 2017 Audit, works have been undertaken to rectify an open section of the landscaping bund that allowed views into the south-western pit from Hitchcock Road. An offset bund has been installed to block views into the pit, but also allows for vehicular access. It is recommended that screen plantings be established on this section of offset bund.	PF Formation do it not consider it necessary to screen plant the off-set bund as it located outside the setback area and is constructed from stable clay materials and is located at the end of Hitchcock Road, therefore having no visual impacts on any residents.

Item	Recommended Action - Opportunities for Improvements	Response
10	<p>It is also recommended that the site induction program for contractors is improved to provide more detailed information on exclusion areas, rehabilitated areas, spill response, and the management of noise and dust impacts. Contractors and staff should be made fully aware of their responsibilities and actions should an environmental incident occur. An environmental induction needs to focus on key environmental risks onsite and reporting requirements. It is recommended that all staff attend a half day environmental awareness training workshop.</p>	<p>PF Formation operates the site under a Pollution Incident Response Management Plan in accordance with the PEO Act 1997. The plan is tested annually, and includes the identification of environmental hazards and pre-emptive management actions and protocols in relation to dealing with environmental hazards.</p> <p>The site induction program will be reviewed and will include management actions and protocols as described in the sites PIRMP. PF Formation does not deem it necessary for staff to attend a half day environmental awareness training workshop.</p>
11	<p>It is also recommended that a compliance database be implemented which contains correspondence from regulators and also tracks due dates for reporting purposes. This database should provide reminders of when to follow up regulators should they not respond to requests, i.e. every 3 months.</p>	<p>PF Formation consider that the existing database and systems for reporting purposes are adequate.</p>