

2023 INDEPENDENT ENVIRONMENTAL AUDIT

Hitchcock Road Sand Extraction and Rehabilitation Project



10934
10 October 2023

REPORT

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Ian Richardson



10 October 2023

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INDEPENDENT AUDIT REPORT DECLARATION FORM

Independent Audit Report Declaration Form


Project Name	PF Formation
Consent Number	DA 06_0104
Description of Project	In accordance with Condition 6 (a) – (e) of Schedule 5 of PA 06_0104 and PF Formation is required to conduct an Independent Environment Compliance audit every three years.
Project Address	1774 Wisemans Ferry Rd, Maroota NSW 2756
Proponent	PF Formation Pty Ltd
Title of Audit	Independent Environmental Audit 2023 – PF Formation
Date	10 October 2023

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

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

Notes:

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

Name of Auditor	Ian Richardson
Signature	

Qualification	Bachelor of Environmental Science Exemplar Global Certified Lead Auditor – Environmental Management Systems (ISO 14001)
Company	RPS AAP Consulting Pty Ltd
Company Address	RPS Newcastle – Unit 2A, 45 Fitzroy Street, Carrington NSW 2294

EXECUTIVE SUMMARY

RPS Australia East Pty Ltd (RPS) were engaged by PF Formation Pty Ltd (the Operator), to undertake an Independent Environmental Audit (IEA) of the Hitchcock Road Sand Extraction and Rehabilitation Project (“the Quarry”), Wisemans Ferry Road, Maroota NSW. This IEA has been prepared to satisfy the requirements of Condition 6 (a) – (e) of Schedule 5 of DA 06_0104 and also the *Independent Audit - Post Approval Requirements (Department of Planning, Industry, and Environment, 2018)*. The IEA covers the reporting period from 25 June 2020 to 24 August 2023.

The audit team from RPS consisted of Ian Richardson (Lead Auditor) and Tam Durney (Assisting Auditor), whose appointment was approved by the Department of Planning and Environment (DPE) on 5 June 2023. Site interviews and a site inspection were undertaken on 24 August 2023.

The audit included an assessment of compliance with the following Project Approval:

- Project Application (PA) 06_0104 was approved 3 February 2009 for the continued extraction of sand and the processing of up to 400,000 tpa or 200 laden vehicle movements per day from the processing plant, and the importation of Virgin Excavated Natural Material (VENM) up to 20 laden trucks per day. Modification (MOD) 1 was approved 3 December 2021, which generally included the following changes:
 - increased beneficial reuse of VENM for reprocessing and ongoing supply of sand to the Greater Sydney Region construction market, enable the beneficial reuse of ENM for the purpose of the progressive rehabilitation of the quarry, and provide continued employment for the existing 22 full-time employees;
 - improved management of community and environmental impacts or offsets to an acceptable level, in accordance with applicable NSW Government policies and guidelines;
 - several changes to terminology and definitions

The audit also included an assessment of compliance with the site EMS, management plans, monitoring reports, and annual reporting, Community Consultative Committee (CCC) actions, and a comparison of predictions in the original Environmental Assessment and subsequent modifications to actual performance.

The IEA did not identify any non-compliances against DA 06_0104 MOD 1 during the audit period. However, the following opportunities for improvement were identified, including:

- If practical, it’s recommended to scan or digitise original survey plan
- When and where required carry out additional weeding activities to reduce the spread of HTWs on and off-site.
- Ensure documents are regularly uploaded online and easily located by the public
- Undertake monthly inspection of erosion and sediment control structures. Where required repair and maintain sediment controls. If applicable employ the use of coir logs.
- Ensure signage on site is visible by appropriately trimming vegetation

Overall, the environmental performance of the operation is good. PF Formation operate in accordance with the Environmental Management Strategy and management plans as required by the development consent.

GLOSSARY OF TERMS

Abbreviation	Description
Annual Review	The review required by condition 6 of Schedule 5 of DA06_0104 MOD 1 and also the Independent Audit – Post Approval Requirements (Department of Planning, Industry, and Environment, 2018).
Applicant	PF Formation Pty Ltd (the Operator), or any person carrying out any development under this consent
Approved Extraction Area	The area identified as such within Figure 1
CCC	Community Consultative Committee
Conditions of this consent	Conditions contained in Schedules 2 to 5 (inclusive) of this document
Council	Hills Shire Council

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Abbreviation	Description
Day	The period from 7am to 6pm on Monday to Saturday, and 8am to 6pm on Sundays and Public Holidays
Department	NSW Department of Planning and Environment
Development	The development described within the documents listed in condition 2 of Schedule 2
Development Layout	The general layout of the development, as shown in Figure 1
DPE Water	Water Group within the Department
EPA	Environment Protection Authority
EP&A Act	Environmental Planning and Assessment Act 1979
EP&A Regulation	Environmental Planning and Assessment Regulation 2021
EPL	Environment Protection Licence issued under the Protection of the Environment Operations Act 1997
EPL3407	Environment Protection Licence No. 3407 issued for PF Formation's operations
Evening	The period from 6pm to 10pm
Feasible	Means what is possible and practical in the circumstances
Heritage NSW	Heritage NSW within the Department
Incident	An occurrence or set of circumstances that: <ul style="list-style-type: none"> • causes, or threatens to cause material harm to the environment, or • results in non-compliance with this consent
Land	Has the same meaning as the definition of the term in section 4 the EP&A Act, except for where the term is used in the noise and air quality conditions in Schedules 3 and 4 of this consent where it is defined to mean the whole of a lot, or contiguous lots owned by the same landowner, in a current plan registered at the Land Titles Office at the date of this consent
Material harm	Is harm to the environment that: <ul style="list-style-type: none"> • involves actual or potential harm to the health or safety of human beings or to the environment that is not trivial; or • results in actual or potential loss or property damage of an amount, or amounts in aggregate, exceeding \$10,000, (such loss includes the reasonable costs and expenses that would be incurred in taking all reasonable and practicable measures to prevent, mitigate or make good harm to the environment) This definition excludes "harm" that is authorised under either this consent or any other statutory approval
Minimise	Implement all reasonable and feasible mitigation measures to reduce the impacts of the development
Quarry Operations	The removal and emplacement of topsoil and overburden, and the extraction, processing, and transportation of material carried out on site
Minister	NSW Minister for Planning, or delegate
Mitigation	Activities associated with reducing the impacts of the development prior to or during those impacts occurring
Negligible	Small and unimportant, such as to be not worth considering
NPWS	National Parks and Wildlife Service
Night	The period from 10pm to 7am on Monday to Saturday, and 10pm to 8am on Sundays and Public Holidays
NOHSC	National Occupational Health and Safety Commission
Non-compliance	An occurrence, set of circumstances or development that is a breach of this consent
Planning Secretary	Planning Secretary of the Department, or nominee
POEO Act	Protection of the Environment Operations Act 1997
Privately-owned land	Land that is not owned by a public authority, or a mining company (or its subsidiary)

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Abbreviation	Description
Reasonable	Means applying judgement in arriving at a decision, taking into account: mitigation benefits, cost of mitigation versus benefits provided, community views and the nature and extent of potential improvements
Rehabilitation	The restoration of land disturbed by the development to a good condition, to ensure it is safe, stable and non-polluting
Resources Regulator	NSW Resources Regulator
ROM	Run-of-Mine
Site	The land listed in Appendix 1 and outlined in Figure 1
Statement of Commitments	The Applicant's commitments in Appendix 3 DA 06_0104
TfNSW	Transport for NSW

1 INTRODUCTION

RPS Australia East Pty Ltd (RPS) were engaged by PF Formation Pty Ltd (the Operator), to undertake an Independent Environmental Audit (IEA) of the Hitchcock Road Sand Extraction and Rehabilitation Project (“the Quarry”), Wisemans Ferry Road, Maroota NSW (refer **Figure 1**). This IEA has been prepared to satisfy the requirements of Condition 6 (a) – (e) of Schedule 5 of DA 06_0104 and also the *Independent Audit - Post Approval Requirements (Department of Planning, Industry, and Environment, 2018)*. The IEA covers the reporting period from 25 June 2020 to 24 August 2023

The audit team from RPS consisted of Ian Richardson (Lead Auditor) and Tam Durney (Assisting Auditor), whose appointment was approved by the Department of Planning and Environment (DPE) on 5 July 2023. Site interviews and a site inspection were undertaken on 24 August 2023.

1.1 Background

The Quarry extracts material from the Maroota Sand geological formation and is situated on the Hornsby Plateau approximately 50 kilometres (km) to the northwest of the Sydney Central Business District (CBD) and about 8 km south of Wisemans Ferry. The Quarry has been in operation since the mid 1980’s supplying sand to the building and construction industry.

Approval for the Project was granted by the NSW Land and Environment Court in 1998 (following a non-determination by Council), with approval to produce a maximum of 400,000tpa of processed sand with a daily limit of 200 laden vehicle movements from the processing plant and a Project life to 30 November 2028.

The current Project Approval (DA 06_0104), granted 3 February 2009, approved sand extraction within additional parcels of land, amended the allowable depth of extraction from 187m AHD to 183m AHD, and approved the importation of 20 laden loads per day of Virgin Excavated Natural Material (VENM) to the site for recycling or processing.

Generally, the following activities are undertaken under the current approved consent:

- Extraction of tertiary sand, friable sandstone, clay and gravel to within two metres of the wet weather high groundwater table
- Loading and transport of sand via articulated vehicles to the sand slurry plant located at the northern end of the site. Other extracted material would be stockpiled for later reuse as backfill or for transport to the central wash plant on Lot 198 DP752025 prior to removal to market
- Staged clearance of vegetation within those areas designated for extraction
- Transport of extracted material as a slurry via pipeline to the central wash plant on Lot 198 DP752025
- Processing and stockpiling of extracted material at the central wash plant
- Importation and processing of clean material for recycling up to a maximum 250,000 tonnes of VENM or ENM per calendar year
- Return of wash water via pipeline and disposal of tailings from the processed sand into sedimentation ponds located in the south of the site
- Use of the existing access from Lot 1 DP34599 to Old Northern Road for transport of friable sandstone product not requiring processing at the central wash plant on Lot 198 DP752025
- Off-site transport of product
- Use of the existing dam on Lot 167 DP752039 to receive and detain runoff from the extraction area and return clean water to the sand slurry transport system and the existing dam on Lot 198 DP752025 to receive and detain runoff from the central wash plant area
- Rehabilitation of extracted areas on the site of the proposal to create an integrated, continuous landform across all extracted areas as the basis for productive future use.

On 3 December 2021 MOD 1 was approved by DPE. A summary of changes made as part of MOD 1 are provided in the following section.

1.1.1 PF Formation - DA 06_0104 MOD 1

PF Formation – Hitchcock Road Sand Project – Lots 1 & 2 DP732708 - 97 & 113 Old Telegraph Road Maroota.

Issue Date: 14/07/1998

Expiry Date: 30/11/2038

MOD 1 Approved 3 December 2021

Updates to Schedule 2, including:

- General terminology, and definitions
- Traffic Management Plan
- Reporting and Auditing
- Management Plan Requirements, and
- Revision of Strategies, Plans and Programs

1.1.2 Environment Protection Licence

PF Formation operates under Environment Protection Licence (EPL) 3407, with an anniversary date of 30 September. Monitoring results are reported to the EPA as part of the PF Formation EPL. The monitoring data is available on the PF Formation website with the Annual Returns are provided by PF Formation upon request.

1.2 Operations During the Audit Period

Operations continued at PF Formation during the reporting period. Truck, and shovel mining methods are used to handle overburden and material. The quarry operates from 7am to 6pm (Monday to Saturday) as per consent conditions hours a day. The general site overview is presented in **Figure 1** below.



Figure 1 Regional context

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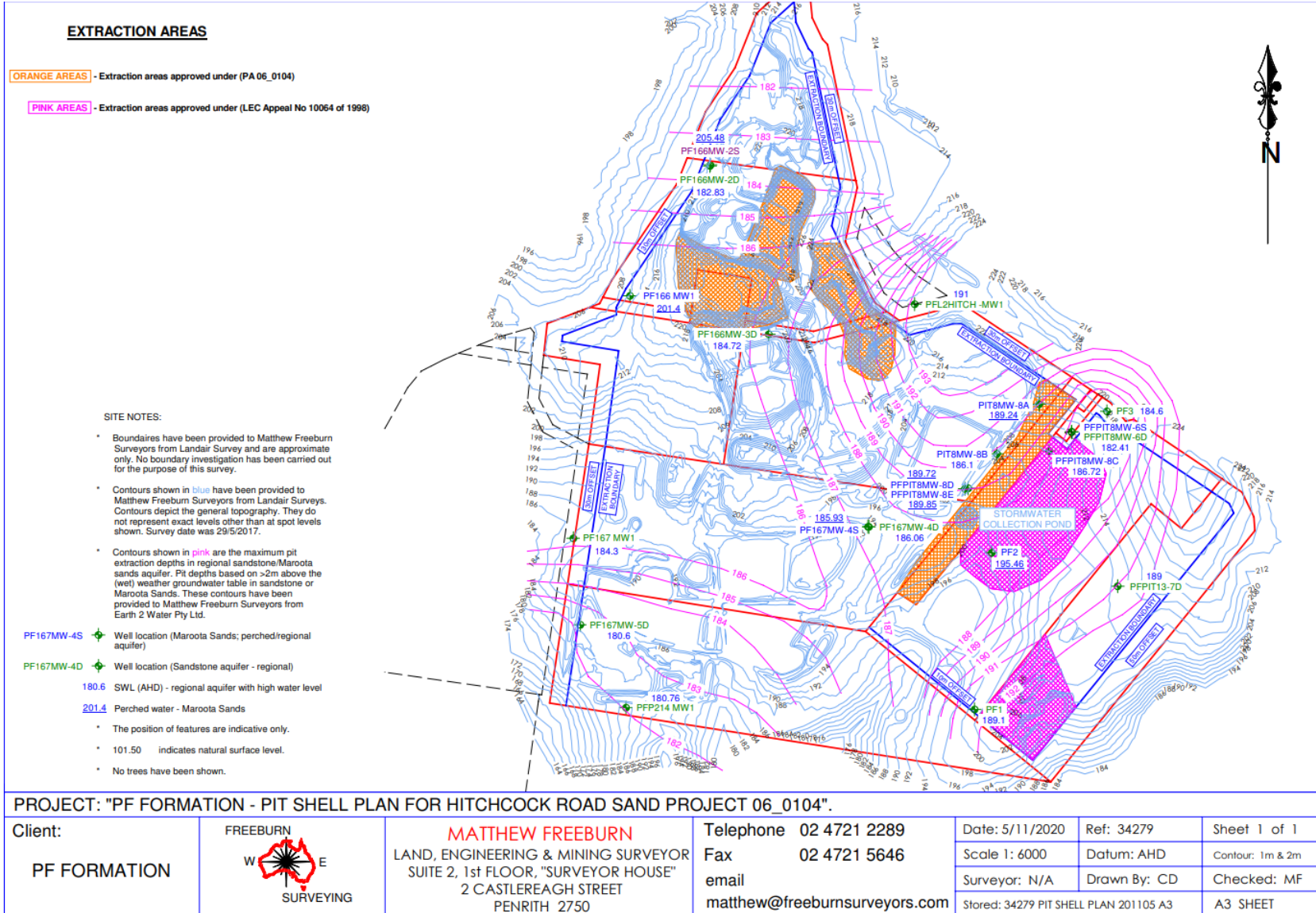


Figure 2 Site overview

1.3 Audit team

The RPS 2023 IEA team, included personnel outlined in **Table 1** below. Refer to the letter from the Department provided in **Appendix A**.

Table 1 2023 PF Formation IEA Team

Personnel	Audit Team Role
Ian Richardson	Lead Auditor – RPS AAP Consulting
Tam Durney	Assistant Auditor – RPS AAP Consulting

1.4 Audit scope

The scope of the audit was limited to assessing the environmental performance of the operations in accordance with DA 06_0104 MOD 1 for the period between 25 June 2023 to 24 August 2023. The scope of the audit included an assessment of the following matters:

- The conditions of all relevant approvals
- Management plan requirements
- The requirements of relevant regulatory agencies
- The status of the operation
- The key regulatory risks, including past or future risks
- The predictions of environmental impact assessments
- The performance of the operation
- Results from previous audits
- Any incidents or community complaints
- Feedback received from other regulatory agencies on the performance of the operation
- Feedback received from the community / community consultative committee on the performance of the operation
- Agency policy or other focus areas.

There was no requirement to formally audit the operations Environment Protection Licence (EPL3407) for the EIA, however for completeness a review of the conditions for EPL3407 was undertaken.

1.5 Audit objectives

In accordance with Condition 6 of Schedule 5 of DA 06_0104, this audit:

- Assesses the environmental performance of the project, and its effects on the surrounding environment
- Assesses whether the project is complying with the relevant standards, performance measure and statutory requirements
- Provides a review of the adequacy of the strategies/plans/programs required under the project approval and recommends measures and actions to improve the environmental performance of the project, and any plan or strategy required under the project approval.

The audit findings presented in this report are based on the condition of the site at the time of the site inspection, consultation with relevant agencies, documentation publicly available and that provided by PF Formation. All reasonable efforts have been made to gather adequate evidence which is current and relevant to the site.

1.5.1 DA 06_0104 MOD 1

INDEPENDENT ENVIRONMENTAL AUDIT

Schedule 5 Condition 6

Within 12 months of the date of this consent, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:

- (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Planning Secretary;*
- (b) include consultation with the relevant agencies;*
- (c) assess the environmental performance of the development, and its effects on the surrounding environment;*
- (d) assess whether the development is complying with the relevant standards, performance measures and statutory requirements; and*
- (e) review the adequacy of any strategy/plan/program required under this consent, and, if necessary, recommend measures or actions to improve the environmental performance of the development, and/or any strategy/plan/program required under this consent.*

2 AUDIT METHODOLOGY

2.1 Task 1 Pre-audit Activities

2.1.1 Pre-Audit Meeting and Documentation Requests

RPS undertook initial discussions with PF Formation to organise the audit, including the provision of documentation through requests for information (RFI) and provided an Audit Agenda for the site visit and timing.

Review of documentation provided by PF Formation and their representatives and preparation of compliance assessment checklists that included a list of conditions of key regulatory approvals to be assessed for compliance.

2.1.2 Approval and Regulator Consultation

The Department reviewed the nominations and information provided in accordance with the requirements of the consents and the Department's IAPAR (May 2020) and was satisfied that the RPS audit team was suitably qualified and experienced. RPS was directed by Department to undertake the audit in accordance Schedule 5, Conditions 6 and 7 of the consent.

The audit team was approved by the Department on 05 July 2022. A copy of the approval letter is located in **Appendix A**. Following DPE approval of the RPS Audit Team, RPS consulted via email with relevant regulators with respect to the audit scope in accordance with the DPE *IAPAR, 2020 Guidelines*.

The Department requested that a copy of the IEA report was to be submitted to the Major Projects Portal, together with PF Formation's responses to any recommendations contained in the report, must be submitted within 6 weeks commencing the audit (the last inspection date) as required by Schedule 5, Condition 7 of this consents, or as otherwise agreed by the Planning Secretary.

Relevant comments and requests from other regulators were included in the Audit Report and investigated as part of the audit as required.

2.2 Task 2 Site Inspection and Interviews

The Audit Team conducted the audit site visit over one (1) day on 24 August 2023. The audit site inspection comprised of:

- Document reviews.
- Interviews with relevant personnel.
- Site inspection.

Opening and closing meetings were held to ensure open communication with PF Formation and provide preliminary Audit findings.

2.2.1 Opening Meeting

An opening meeting was held on 23 July 2023 upon commencement of the audit at the site. The purpose of this meeting was to confirm the objectives of the audit, the scope of the audit, the resources required and methodology to be applied.

2.2.2 Site Inspection and Interviews

The Lead Auditors undertook a site inspection, which involved physical validations and collection of a photographic record. The auditor's observations used to supplement information gathered during the review of documents and records.

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A site visit was conducted on 24 August 2023 at the development site. During the site inspections the weather conditions were generally sunny and calm. Daytime average temperature was approx. 20°C, with relatively low wind conditions during through the day.

Photographs from the audit site inspection supporting audit findings are provided in Appendix D.

During the site visit the following was sighted and/or inspected:

- Extraction areas
- Sediment control dams
- Process water dams and water storage dams
- Mobile plant and equipment
- Sand processing equipment
- Monitoring equipment and meteorological monitoring station
- Site office, workshop and storage areas (approved under The Hills Shire DA 2592/2005/HE)
- Site entry, weigh bridge and access roads
- Site signage
- Perimeter bund
- Diesel filling station
- Groundwater monitoring point
- Dust Depositional Gage (DDG) locations
- Landscaping
- Rehabilitated areas
- Tailings storage.

Observations were made in relation to the site's general environmental management and performance including air, noise, water, visual amenity, waste, hydrocarbon management, soil and erosion, and vegetation. Refer to **Plate 1 to Plate 15** in **Appendix D** for photographs taken during the site inspection.

During the site inspection, Joshua Graham – Managing Director was interviewed to verify compliance with the consents and associated documents.

2.2.3 Close-out Meeting

In accordance with ISO 19011:2018 Guidelines for auditing management systems an opening and closing meeting was held during the Site inspection.

At the completion of the audit site inspections, a brief close-out meeting was held with relevant PF Formation personnel via Microsoft Teams. The purpose of the close-out meeting was to provide and receive feedback on the audit process and present the summary of preliminary findings, recommendations, and any post-audit actions. It should be noted that additional findings based on a detailed document reviews as part of the audit process were required following the completion of the site inspection. As such, the summary of preliminary findings detailed in the closeout meeting did not cover all findings associated with the audit.

2.3 Task 3 Draft IEA Report

During the site visit, and as required following the site visit, the audit team conducted a review of the key documentation provided. Each requirement within the audit compliance tables were reviewed and evidence gathered to support an assessment of compliance. Whilst personal communication does provide valuable input into this process it was not relied upon as verification of compliance.

An assessment of environmental performance was undertaken and reported in the audit report where issues were identified. A review of the Environmental Management Strategy and Environmental Monitoring Program were undertaken, and a summary provided in the audit report.

A single consolidated report was prepared (this report), with separate audit tables appended to address the relevant approval instruments.

2.4 Task 4 Finalise IEA Report

Following receipt of consolidated comments from PF Formation, RPS updated and finalised the IEA Report and reissued for PF Formation to submit to the Department via the Major Project website.

2.5 Scope Development

The IEA was undertaken in general accordance with:

- The Department’s Post-approval requirements for State Significant Developments Independent Audit Guideline (Independent Audit Guideline, 2015).
- The Department’s Post-approval requirements for State Significant Developments Independent Audit Guideline, May 2020 (Independent Audit Guideline, 2020).
- AS/NZS ISO 19011:2018 Guidelines for auditing management systems.
- RPS’s proposal (dated 26 July 2022).

2.6 Consultation

Schedule 5, Condition 6 of DA 06_0261 MOD 1 requires the IEA to include consultation with the CCC and relevant agencies. Noting consultation contacts for the Hills Shire Council and the CCC currently has the same primary contact. A summary of the consultation undertaken is provided in **Table 6** of the regulatory agencies which were sent requests for comment on 19 July 2023 along with the status of any responses received.

Table 2 Regulator Response Summary

Regulatory Agency	Response Received	Date Received
NSW Department of Planning and Environment	Y	19/07/2023
Natural Resources Access Regulator (NARA), now NSW Department of Planning and Environment, Water Division (DPE Water)	Y	19/07/2023
NSW Environment Protection Authority	Y	04/08/2023
NSW Resources Regulator	Y	19/07/2023
The Hills Shire Council	Y	19/07/2023
Crown Lands	Y	24/07/2023
Community Consultative Committee	Y	24/07/2023

A summary of comments received from the regulatory agencies as well as responses to regulator consultation is provided in **Appendix C**.

2.6.1 Community consultative committee

The developments Community Consultative Committee (CCC) were informed of the audit via email and given the opportunity to provide comments or feedback on issues of concern. The consultation is summarised below in **Table 4** and copies of email correspondence are provided in **Appendix B**.

Table 3 Community Consultative Committee

Contact Details	Date	Method	Comment / Outcome
-----------------	------	--------	-------------------

Lisa Aylward

kmckenzie@thehills.nsw.gov.au	19.06.2023 Request for consultation through CCC Chairperson and PF Formation	<p>Response received from Kristine Mckenzie 24.06.23 noting two issues:</p> <p><i>“1. Ensure that all setback areas are marked with survey markers or similar and that works have not encroached into the setback areas; and</i></p> <p><i>2. The maintenance of landscape screening around the site.</i></p> <p><i>I would request that these matters be reviewed as part of your audit.”</i></p> <p>The 2023 IEA confirms setback areas are marked and signposted. Bunding around the site and vegetation screening has been observed.</p>
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2.7 Compliance Status

The compliance status was determined using the relevant descriptors in accordance with the Independent Audit Post Approval Requirements (the Department, May 2020) provided in **Table 4** below.

Table 4 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 during the temporal scope of the audit being undertaken (may be a retrospective or future requirement), therefore an assessment of compliance is not relevant.

Previous audit descriptors of partial compliance, partial non-compliance, not verified or administrative non-compliance or other similar terms must not be used in accordance with the above requirements.

As part of the Audit evaluation, the auditor may make observations, including identifying any opportunities for improvement in relation to any compliance requirement or any other aspect of the project. Any observations or notes are in addition to the compliance status descriptor assigned to each compliance requirement, limited to the descriptors listed in **Table 4**.

2.8 Evidence Validation

The audit team undertook verification activities to confirm the reliability of audit evidence. This included an interview, data checking, the examination of records, and site inspections. Records were provided in electronic and/or hard copy by site personnel and additional documents were reviewed whilst on site.

Some aspects of the audit process may have relied on information such as judgements and assumptions where external supporting evidence was unavailable or limited. Where this information was considered, its validity was confirmed to the extent possible prior to use by the auditors and is noted in appropriate areas of the audit checklists.

The majority of information was assessed off-site prior to the site inspection. The site inspections concentrated on assessment of the effectiveness of environmental management and adequacy of performance. The extent of audit activities was limited to the time available for the audit site inspections and interview over one (1) day.

3 AUDIT FINDINGS

3.1 Approval and document list

The developments consent DA 06_0104 MOD 1, originally issued by the Department of Planning on 3 December 2021, was the primary approval document audited. Various elements of the following documents, were also audited or reviewed to assess compliance:

- Environmental Assessment, PF Formation Pty Ltd: Hitchcock Road Sand Extraction and Rehabilitation Project, Maroota (Volumes 1, 2 and 3), November 2007 prepared by DFA Consultants
- Environmental Protection Licence 3407.

In addition to the approvals listed above, other documentation sighted and reviewed included:

- Environmental Management System, September 2022, prepared by South East Environmental
- Air Quality Monitoring Program, September 2022, prepared by South East Environmental
- Landscape Management Plan, including Rehabilitation and Offset Management Plan, Quarry Closure Plan, July 2022, prepared by South East Environmental
- Noise Management Plan, including Noise Monitoring Program, June 2022, prepared by South East Environmental
- Water Management Plan, including ESCP, Surface Water Monitoring Program, Groundwater Monitoring, July 2016, prepared by South East Environmental
- Amended Independent Environmental Audit of Hitchcock Road Sand Project, August 2020, prepared by RPS
- Annual Environmental Monitoring Review (AEMR) 2020 – 2021, and AEMR 2021 – 2022.
- 2020, 2021, 2022 Annual Environmental Management Review, prepared by South East Environmental
- Groundwater Report, Hitchcock Road Site & Annual Groundwater Management Plan 2020– 2023, prepared by Earth2Water Pty Ltd
- Quarterly Attended Noise Monitoring Results 2020– August 2023.
- Monthly Water Monitoring Results 2020– August 2023.
- Community Consultative Committee Meeting Minutes 2020 – August 2023.

3.2 Compliance performance

In summary, following a review of information, site inspection, interviews, and consultation the audit found the following:

DA 06_0104

- 71 Compliant
- 0 Non-compliant
- 7 Not triggered.

Non-compliances are detailed further in **Section 4.4**.

3.3 Summary of agency notices, orders, penalty notices or prosecutions

During the reporting period the Department issued two voluntary undertakings for DA 06_0104 MOD 1. The voluntary undertakings were in relation to:

- Traffic Management Plan (TMP)
PF Formation previously submitted the updated TMP for approval in 2022. DPE has requested the updated plan is submitted by 31 October 2023.
- Water Management Plan (WMP)
The Updated WMP was submitted March 2022. However, DPE has requested further changes requiring the WMP to be withdrawn, with no due date issued by DPE.

Evidence provided by PF Formation, including consultation with Department, indicates that these voluntary undertakings are currently in the process of being completed.

3.4 Non-compliances

The following section provides details of the non-compliances under DA 06_0104 MOD 1. Further detail can also be found in the **Audit Table** attached as **Appendix C**.

During the Audit period no Strick non-compliances were observed, however several opportunities for improvement are noted against the consents Statement of Commitments.

3.5 Previous audit recommendations

Detailed below in **Table 6** is a summary of the recommendations from the 2017 - 2020 independent environmental audit, actions undertaken, and the current status.

Table 5 2017 – 2020 Audit Recommendations and Action Status

Item	Action Taken	Status
1. The development is generally being carried out in accordance with the EA, statement of commitments and with the conditions of approval, however a number of non-compliances were identified. These are addressed against the specific conditions below.	Addressed in section below	Complete
2. Extraction boundary markers should be reviewed, provided with clear signage, and updated and maintained to be permanent markers.	Instillation of fencing and signage occurred on the perimeter of the extraction boundary.	Complete
3. Sediment fences are to be cleaned out regularly to ensure they maintain their integrity and should form part of regular inspections and maintenance.	Sediment fencing has been replaced since previous Audit	Complete
4. A revised Offset Strategy should be prepared and implemented as soon as practicable that is consistent with current offsetting requirements in NSW.	The Offset Strategy is contained within the Landscape Management Plan (LMP), approved by DPE 21/06/2022.	Complete

3.6 EMS, sub-plans, and post approval documents

Following the 2020 audit, documents were reviewed, with several changes or updates made. The continual improvement process of an EMS should apply which requires regular updating of documents. DPE has acknowledged the following EMS and sub-plans have been reviewed or updated, with their most recent review date provided along side:

- Environmental Management Strategy, September 2022
- Air Quality Monitoring Program, September 2022
- Noise Management Plan, July 2022
- Landscape Management Plan, including Rehabilitation and Offset Management Plan and Quarry Closure Plan, July 2022
- Pollution and Incident Response Management Plan, November 2022

Noting the following plans are currently under review by PF Formation following feedback from DPE:

- Water Management Plan, including Erosion and Sediment Control Plan (ESCP), Surface Water Management Plan (SWMP) and Groundwater Management Plan (GWMP), January 2016
An updated WMP was submitted March 2022. Further changes were requested by DPE water requiring the WMP to be withdrawn to address the changes. WMP updates are currently in progress.
- Traffic Management Plan (TMP) 2022
PF Formation provided an updated TMP to DPE. TMP updates are currently in progress with DPE requesting a plan is submitted by 15 September 2023.

3.7 EMS

The developments Environmental Management Strategy (EMS) was reviewed and updated August 2022 following the previous IEA, and following approval of MOD 1 on 3 December 2021. DPE approved the updated EMS 9 September 2022, noting the “updated EMS has addressed the Department’s comments and contains the information required by the conditions of consent”.

As required the EMS should be updated annually in response to operational changes, changes in key personnel, changes to approvals, following an incident or management review.

3.8 Environmental performance

Following a thorough review of management plans, monitoring results, annual reporting, agency consultation, and a site inspection and interviews, the environmental performance of the quarry operations was found to be good. During the site visit there were no major areas of concern identified, however there are areas for improvement. Most recommendations from the 2020 audit had been implemented by the operator and management were aware of their environmental obligations, including site compliance, reporting, and documentation. All environmental records are either filed on site and reporting is hosted on the PF Formation website (www.pfformation.com.au).

No non-compliances were identified during this audit, however there are several opportunities for improvement identified.

During consultation with government agencies and the CCC two requests were made for items to be followed up during the site inspection for the audit. The EPA recommended the following be considered in the 2023 IEA; Waste management, Water management, Air quality, Noise, and Risk of pollution incidents. The Hills Shire Council requested a review of landscape screening and setback markers to ensure setback areas are not encroached.

Following the 2020 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, and dense vegetation presently surrounds the site.

The Landscape Management Plan (LMP) has been prepared in compliance with Condition 24 of Schedule 3 of the Development Consent DA 06_0104 MOD 1. The LMP includes the Rehabilitation and offset management plan, and Quarry closure plan.

Two additional groundwater monitoring wells have been established in the main pit area since the previous audit in 2017. These wells provide data on the wet weather groundwater level to ensure extraction does not exceed 2m from that wet weather level. The 2023 audit confirmed these will be still operational.

Rehabilitation established within Lot 2 DP 233818 was inspected during the site inspection and appeared to be well established, maintained, and providing habitat for wildlife onsite. RPS ecologists reviewed photographs and data of the rehabilitation and establish, concluding the site remains in excellent condition.

3.9 Consultation outcomes

Prior to the audit, consultation was undertaken with relevant government agencies and the CCC seeking feedback on issues or concerns to be addressed during the audit. Details of the consultation undertaken, and the responses are provided in **Table 3** and **Table 4**.

All audit consultation correspondence is attached as **Appendix B**.

3.10 Complaints

There were no complaints recorded for the audit period as reported in the AEMRs and as confirmed during the onsite interviews.

3.11 Incidents

There were no incidents recorded for the audit period as reported in the AEMRs and as confirmed during the onsite interviews.

3.12 Actual versus predicted environmental impacts

The audit process has involved the review of monitoring and annual environmental management reports for the quarry operations. The following comments are provided regarding actual and predicted environmental impacts.

Noise

Noise monitoring is undertaken annually at the development. Attended monitoring identified that operational noise emissions generated by the quarry comply with relevant statutory noise limits. Furthermore, project related noise emissions are generally masked by noise sources from road traffic and rural noise sources. Noise monitoring results also indicate that noise management controls are providing suitable mitigation.

Air Quality

Air quality monitoring results were relatively consistent throughout 2020/2021/2022, particularly through the drier months of the year.

Overall results were consistent with previous years across all monitoring sites with none of the sites exceeding the nuisance criterion annual monthly average of 4 g/m²/month.

Groundwater

Ground water levels are monitored continuously throughout the year at 4 separate licenced bore locations using a Solinst datalogger, however in total 23 wells are monitored monthly throughout the year and an additional 3 were monitored for part of 2019. Pumping did occur from 1 licenced spring POR 167 from 2020 to 2021, however the annual allocation of 44ML was not exceeded. Water pumping also took place from the licenced spring from 2020 – 2021, however the volume extracted was below allowable limits.

Ground water analysis met all requirements and showed no abnormalities or exceedances during the audit reporting period.

Surface Water

The site does not have any permanently flowing surface waters. Existing surface water is limited to a supply sump in an area of previous extraction and a number of small farm dams. The existing tailings ponds and sediment basins will maintain the quality of the intermittent surface water flows experienced on the site.

Monitoring of surface water quality outside of the property boundary in the Maroota State Forest south from Lot 214 DP 752039 commenced in March 2018. Quarterly samples are also taken from an existing monitoring site on the creek below Lot 198 DP 752025. The pH, electrical conductivity and oil and grease results were all within the expected ranges.

Rehabilitation

In December 2021, South East Environmental undertook monitoring of the rehabilitated areas to determine rehabilitation success, including an assessment of 5, 10, and 15 year targets. Since the previous survey there has been a stabilisation or general improvement in the habitat quality and native species diversity

cover and vegetation structure. The return to average rainfall conditions over the past two years have increased the diversity of native ground cover species such as forbs and ferns. Noting this has also caused an increase in weed species diversity and density, however management of these areas has been undertaken. Erosion noted in previous years appears to be stable with increasing cover of groundcover vegetation. Findings indicate that rehabilitation is progressing well and is generally meeting or exceeding the targets set for the above target periods. It has been recommended that monitoring, and additional weed control be undertaken to further enhance rehabilitation success.

3.13 Site inspection

The following areas were viewed and photographed as evidence during the onsite inspection:

- Active extraction areas
- Processing plant and equipment
- Drying ponds
- Depositional dust gauges
- Groundwater piezometers
- Workshop and laydown areas on Lot 198
- Site entrance and access road
- Rehabilitation areas and remnant vegetation
- Site water storages
- Visual bunds and landscaping
- Setback markers
- Perimeter fencing.

Photographs taken during the site inspection are attached as **Appendix D**.

3.14 Site interviews

The following additional evidence was supplied as a result of the interview process and RFI provided following the site inspection for the audit:

- Pit shell plan dated 5.11.2020
- Pollution Incident Response Plan dated 3.11.2023
- Letter evidence from DPE regarding the revision of management plans and Maximum Extraction Depth Map dated approved by DPE in May 2021
- Department correspondence relating to Schedule 3 Condition 2(b) – buffer zones.
- Copy of WAL42259 dated 6.2.2019 and WAL42252 dated 25.1.2019
- Evidence of Department acceptance of 2021 and 2022 Annual reviews
- Department and TfNSW correspondence in relation of updated TMP
- Department correspondence relating to updated WMP.
- Water, noise, and dust monitoring results from January 2023 to August 2023.
- Extraction records indicating volume is under 400,000 tonne per year limit.
- Summary of vehicle movements
- Met station details

3.15 Improvement opportunities

The audit notes two management plans are currently in review, the TMP and WMP with department issuing dates for their receipt. These documents should be submitted within the allocated timeframe and uploaded for display on the PF Formation website. It's recommended to ensure documents that receive annual review are uploaded promptly.

One area where improvement may occur relates to weed control. As observations noted an increase in weeds present following increase rainfall, additional weeding activities should occur to reduce the spread of HTWs on and off-site. It's also recommended sediment control structure are repaired and maintained more frequently as required, as observations found sediment fencing withheld a high volume of material.

3.16 Key strengths

A number of key strengths of the quarry operations were identified during the audit. These included:

- onsite water management within active disturbance areas
- no complaints were recorded for the audit reporting period
- no incidents were recorded for the audit reporting period
- visual bunds provide effective screening
- landscape plantings are extremely well established and maintained providing ample screening
- Attended noise monitoring during the audit reporting period has indicated that there are no excessive noise impacts from the operation
- Rehabilitated areas are well established and contain a diversity of plant species
- Good working relationship with the CCC.

4 STATUS OF RECOMMENDATIONS

4.1 Previous annual review recommendations

The IEA conducted a reviewed against the recommendations made from the annual reviews (AEMR), including the following:

- 2021 AEMR (Reporting period 2020 to 2021); and
- 2022 AEMR (Reporting period 2021 to 2022).

The findings of which have been provided in **Table 7**. Note as the 2022 to 2023 annual review has not yet occurred, monitoring data a results have been observed up till the ending date of the 2023 audit period (i.e., 24 August 2023).

Table 6 2020 – 2022 Annual Review Actions and Recommendations

Aspect	Action	Timing	Status
Operations	Extraction boundary markers should be reviewed, provided with clear signage, and updated and maintained to be permanent markers.	2021 AEMR reporting period	Complete
Operations	Sediment fences are to be cleaned out regularly to ensure they maintain their integrity and should form part of regular inspection and maintenance.	2021 AEMR reporting period	Complete
Biodiversity and Rehabilitation	A revised Offset Strategy should be prepared and implemented as soon as practicable that is consistent with current offsetting requirements in NSW.	2021 AEMR reporting period	Complete

A review of the AEMR found actions have been completed. However, the following observations were made:

- Actions and recommendations from each AEMR appeared to be identical between each reporting period. Indicating actions may have been outstanding from the 2021 AEMR.

4.1.1 DA 06_0104 MOD 1

The IEA did not identify any non-compliances against DA 06_0104 MOD 1 during the audit period. However, the following opportunities for improvement were identified as detailed in the following section.

4.2 Opportunities for improvement

below outlines the opportunities for improvement (OFI) identified during the audit. The OFIs detailed below are based around continuous improvement opportunities identified during the audit and do not represent immediate non-compliance issues.

Table 7 Opportunities for Improvement

OFI Ref	Condition Ref	Context	Opportunities for Improvement
OFI 01	S3 C1	PF Formation cannot provide soft copy of approved survey plan as only a physical copy exists.	If practical, it is recommended to scan or digitise original survey plan
OFI 02	S3 C25	Site conditions generally in good, however some High Threat Weeds (HTWs) such as Pampas Grass were observed in patches.	When and where required carry out additional weeding activities to reduce the spread of HTWs on and off-site.
OFI 03	S5 C10	Reporting documents were observed and accessible online, however the PF Formation website could be more user friendly to allow easier access/site navigation and interpretation of reporting results.	Ensure documents are regularly uploaded online and easily located by the public
OFI 04	-	Sediment fencing surrounding the tailing dam was observed as functional and intact. However, some areas appear to experience greater flow and surface run off. Requiring more frequent maintenance.	Undertake regular inspection of erosion and sediment control structures. Where required repair and maintain sediment controls. If applicable employ the use of coir logs.
OFI 05	-	Dense vegetation surrounding site signage may impact sign visibility	Ensure signage on site is visible by appropriately trimming vegetation
OFI 06	-	Two onsite groundwater monitoring locations are located in an area of high vehicle movement. Monitoring sites are at risk of vehicle damage as no protective bund is in place.	Install physical bund around monitoring sites for protection.
OFI 07		During the site inspection it was noted that some minor spilling was evident in front of the Diesel fill point as indicated in Plate 5.	Ensure that bund integrity is reviewed and minor spills are cleaned up.

5 CONCLUSION

RPS Australia East Pty Ltd (RPS) were engaged by PF Formation Pty Ltd (the Operator), to undertake an Independent Environmental Audit (IEA) of the Hitchcock Road Sand Extraction and Rehabilitation Project (“the Quarry”), Wisemans Ferry Road, Maroota NSW. This IEA has been prepared to satisfy the requirements of Condition 6 (a) – (e) of Schedule 5 of DA 06_0104 and also the *Independent Audit - Post Approval Requirements* (Department of Planning, Industry, and Environment, 2018). The IEA covers the reporting period from 25 June 2020 to 24 August 2023.

The audit team from RPS consisted of Ian Richardson (Lead Auditor) and Tam Durney (Assisting Auditor), whose appointment was approved by the Department of Planning, Industry and Environment (DPIE) on 5 June 2023. Site interviews and a site inspection were undertaken on 24 August 2023.

The audit included an assessment of compliance with Project Application 06_0104 MOD 1, approved 3 December 2021. The approval permitted the continued extraction of sand and the processing of up to 400,000 tpa or 200 laden vehicle movements per day from the processing plant, and the importation of Virgin Excavated Natural Material (VENM) up to 20 laden trucks per day.

The audit also included an assessment of compliance with the site EMS, management plans, monitoring reports, and annual reporting, Community Consultative Committee (CCC) actions, and a comparison of predictions in the original Environmental Assessment and subsequent modifications to actual performance.

An assessment of the actions recommended in the 2020 conducted by RPS (report dated June 2020) was carried out during this audit and it was found that all 4 actions had been completed.

The IEA did not identify any non-compliances against DA 06_0104 MOD 1 during the audit period. However, the following opportunities for improvement were identified, including:

- If practical, to scan or digitise original survey plans
- When and where required carry out additional weeding activities to reduce the spread of HTWs on and off-site.
- Ensure documents are regularly uploaded online and easily located by the public
- Undertake monthly inspection of erosion and sediment control structures. Where required repair and maintain sediment controls. If applicable employ the use of coir logs.
- Ensure signage on site is visible by appropriately trimming vegetation
- Install physical bund around groundwater monitoring sites for protection.

Overall, the environmental performance of the operation is good. PF Formation operate in accordance with the Environmental Management Strategy and management plans as required by the development consent.



Appendix A **Planning Secretary Audit Team Agreement**

Joshua Graham
PF Formation Pty Limited
4713 Old Northern Road
Maroota NSW 2756

05/07/2023

Dear Mr Graham

**Hitchcock Road Quarry - MP06_0104
Independent Environmental Auditor Approval Request**

I refer to your request (MP06_0104-PA-29) for the Secretary's approval of suitably qualified persons to prepare the 2023 Independent Environmental Audit (**IEA**) and report for the Hitchcock Road Quarry (**project**), MP06_0104 as modified (**consent**).

The Department of Planning and Environment (**department**) has reviewed the nominations and information you have provided and is satisfied that these experts are suitably qualified and experienced. Consequently, I can advise that the Secretary approves the audit team detailed below to prepare the 2023 IEA.

In accordance with Schedule 5, Condition 6(a) of the consent, the Secretary has agreed to the following audit team from RPS AAP Consulting Pty Ltd:

- Mr Ian Richardson as lead auditor; and
- Mr Tambalyn Durney as assistant auditor.

Please ensure this correspondence is appended to the IEA report.

The Independent Audit must be prepared, undertaken and finalised in accordance with Schedule 5, Conditions 6 and 7 of the consent. Failure to meet these requirements will require revision and resubmission. I note that the request advises that the scope will be developed in accordance with the 'IEA Guidelines'. For clarity, the department requests the IEA be conducted in accordance with the department's *Independent Audit Post Approval Requirements* (May 2020) (**IAPAR**).

Guidance and copies of the IAPAR can be found here:

<https://www.planning.nsw.gov.au/assess-and-regulate/about-compliance/inspections-and-enforcements/independent-audit-post-approval-requirements>

Notwithstanding the agreement for the above-listed audit team for this IEA, each subsequent IEA under the consent and the IAPAR requires a request for the re-endorsement of the existing audit team or a request for agreement to a revised audit team to be submitted to the Department for consideration of the Secretary. Each request is reviewed and depending on the complexity of the project, the suitability of the proposed team will be considered.

Should you wish to discuss the matter further, please contact Astrid Christensen, Compliance Officer, at (02) 9274 6170 or email compliance@planning.nsw.gov.au

Yours sincerely

Department of Planning and Environment



A handwritten signature in black ink, appearing to read "S. Condon".

Samuel Condon
A/Team Leader Compliance - Metro

As nominee of the Planning Secretary



Appendix B Consultation



DOC23/639023-1

Mr Ian Richardson
General Manager, Newcastle – P&E
RPS AAP Consulting Pty Ltd
Unit 2A, 45 Fitzroy Street
Carrington NSW 2294

Email: ian.richardson@rpsgroup.com.au

ELECTRONIC MAIL
4 August 2023

Dear Mr Richardson,

Consultation for Independent Environmental Audit – Hitchcock Road Sand Extraction and Rehabilitation Project - PF Formation Pty Ltd – EPL No. 3407

The NSW Environment Protection Authority (EPA) refers to Environment Protection Licence No. 3407 (Licence) issued to PF Formation Pty Ltd (Licensee) to carry out the scheduled activity of extractive activities at 1774 Wisemans Ferry Road, Maroota NSW 2756 (Premises).

On 19 July 2023 you advised the NSW Environment Protection Authority (EPA) that the Department of Planning, Industry and Environment (DPIE) has appointed RPS AAP Consulting Pty Ltd (RPS) as the independent auditor to undertake the 2023 Independent Environmental Audit (IEA) of the Hitchcock Road Sand Extraction and Rehabilitation Project which is undertaken at the Premises. As required by Schedule 5, Condition 6(b) of Project Approval (PA) 06_0104, you are required to engage with relevant agencies as part of the audit process and have invited the EPA to raise any concerns or issues with the Premises.

The EPA has not recorded any incidents or received any complaints regarding the undertaking of scheduled activities by the Licensee at the Premises in the last three-year period, since the previous IEA in 2020.

The EPA would recommend the following be considered in the 2023 IEA which are relevant to the operation of sand extraction facilities:

- Waste management;
- Water management;
- Air quality;
- Noise; and
- Risk of pollution incidents.

If you have any questions regarding this matter, please contact Matthew Konza, Operations Officer via email at matthew.konza@epa.nsw.gov.au or on 02 9228 6161.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ruth Ower'.

Ruth Ower
Unit Head
Regulatory Operations Metro West
Environment Protection Authority

Phone 131 555
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(from outside NSW)

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AREQ0043017

Mr Ian Richardson
RPS Group
Unit 2A, 45 Fitzroy Street
Carrington NSW 2294

By email: ian.richardson@rpsgroup.com.au

Dear Mr Richardson,

Subject: Hitchcock Road Quarry

Thank you for your email and letter dated 19 July 2023 requesting consultation on the independent environmental audit to be undertaken of the Hitchcock Road Quarry, operated by PF Formation Pty Ltd.

Records held by the NSW Resources Regulator (the Regulator) indicate that there are no mining leases under the *Mining Act 1992* currently associated with the quarry. As such, the Regulator does not have any requirements for the independent audit.

Yours sincerely

Jenny Ehmsen
Principal Compliance Auditor

19 July 2023

From: [Kristine McKenzie](#)
To: [Ian Richardson](#)
Date: Monday, 24 July 2023 9:01:57 AM

CAUTION: This email originated from outside of RPS.

Hi Ian,

Thank you for the opportunity to comment on your upcoming Independent Environmental Audit in regard to DA 06_0104 for PF Formation.

Compliance with all conditions of consent is required, however specifically the two issues raised as key issues are:

1. Ensure that all setback areas are marked with survey markers or similar and that works have not encroached into the setback areas; and
2. The maintenance of landscape screening around the site.

I would request that these matters be reviewed as part of your audit.

Please don't hesitate to call or email me if you wish to discuss this matter further.

Regards, Kristine



Kristine McKenzie

Principal Coordinator Development Assessment

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Administration Centre, 3 Columbia Court Norwest NSW
2153

PO Box 7064, NORWEST NSW 2153

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Appendix C Independent Environmental Audit Table

DA 06_0104 MOD 1 AUDIT CHECKLIST – PF FORMATION IEA 2023

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Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
SCHEDULE 2 – ADMINISTRATIVE CONDITIONS				
OBLIGATION TO MINIMISE HARM TO THE ENVIRONMENT				
S2 C1	The Applicant must implement all reasonable and feasible measures to prevent and/or minimise any harm to the environment that may result from the construction, operation, or rehabilitation of the development.	Noted	Compliant	
TERMS OF APPROVAL				
S2 C2	The Applicant must carry out the development: (a) generally in accordance with the EA and Modification Report MOD 1; (b) generally in accordance with the preferred project report; (c) generally in accordance with the statement of commitments; and (d) in accordance with the conditions of this consent. Notes: <ul style="list-style-type: none"> The layout of the development is shown in the figure in Appendix 2; and The statement of commitments is included in Appendix 3. 	Noted	Compliant	
S2 C3	If there is any inconsistency between the above: (a) the preferred project report shall prevail over the EA; (b) the conditions of this consent shall prevail generally, to the extent of the inconsistency.	Noted	Compliant	
S2 C4	The Applicant must comply with any reasonable requirement/s of the Planning Secretary arising from the Department's assessment of: (a) any reports, plans, programs or correspondence that are submitted in accordance with the conditions of this consent; and (b) the implementation of any actions or measures contained in these reports, plans, programs or correspondence.	DPE responses to management plans provided by PF Formation, along with a copy of DPE inspection of rehabilitation areas. PF Formation has self-reported compliance matter and response from DPE provided.	Compliant	
EXISTING SAND MINING CONSENT				
S2 C5	Subject to an agreement in accordance with condition 7 below, the Applicant may accept material extracted from Lot 2 DP 555184 and Lot 1 DP 34599 in accordance with the development consent issued by the Land and Environment Court on 14 July 1998 to be transported across the site and to the slurry plant on Lot 1 DP 570966 via the slurry pipeline and processed on Lot 198 DP 752025.	Noted	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
LIMITS ON APPROVAL				
S2 C6	<p>Extraction and processing operations may take place until 30 November 2038.</p> <p>Note: Under this consent, the Applicant is required to rehabilitate the site and provide offsets to the satisfaction of the Planning Secretary. Consequently this consent will continue to apply in all other respects other than the right to conduct extraction and processing operations until the site has been rehabilitated and the offset provided to a satisfactory standard.</p>	Noted	Compliant	
S2 C7	<p>The quantity of processed material produced at the site, together with material produced on Lot 2 DP 555184 and Lot 1 DP 34599 in accordance with the development consent issued by the Land and Environment Court on 14 July 1998, must not exceed 400,000 tonnes a year.</p> <p>Prior to the commencement of any processing of extractive material (under the above consent) from activities on Lot 2 DP 555184 or Lot 1 DP 34599, the Applicant must demonstrate, to the satisfaction of the Planning Secretary, that it has reached an agreement with the owners of those Lots regarding the proportion of the extraction limit as it applies to each Lot.</p>	<p>Extraction records indicating volume is under 400,000 tonnes a year.</p> <p>Refer to AEMR for additional details.</p> <p>Sighted summary for Financial years and up to 14 July 2023.</p>	Compliant	
S2 C7A	The Applicant must not import more than 250,000 tonnes of VENM or ENM per calendar year.	Sighted records	Compliant	
S2 C8	<p>The Applicant must not:</p> <p>(a) receive more than 200 heavy vehicles at the site per day;</p> <p>(b) dispatch more than 200 laden heavy vehicles associated with the Applicant's combined operations at Maroota and the Central Wash Plant site (Lot 198 DP 752025); and</p> <p>(c) allow more than 10 heavy vehicles per day, from entering/exiting the site between 6.00am and 7.00am.</p>	Sighted records	Compliant	
S2 C9	<p>The Applicant must not undertake any extraction within 2 metres of the established wet weather groundwater level.</p> <p>Note: The wet weather groundwater level must be established in accordance with condition 3 of Schedule 3.</p>	<p>Pit depths survey confirming max depth of extraction provided.</p> <p>New shell plan was submitted (MP06 0104-PA-13) following review, extraction levels have not been exceeded.</p> <p>Approval and new shell plan provided.</p>	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
S2 C10	<p>The Applicant must not disturb any SHTW vegetation (as shown on the plan in Appendix 5) on site without the prior written approval of the Planning Secretary. In seeking this approval, the Applicant must demonstrate, to the satisfaction of the Planning Secretary, that it has established at least 3.7 hectares of SHTW on the site, to a standard that meets the criteria in Appendix 6.</p> <p>Note: This demonstration must include an assessment by a suitably qualified and independent ecologist.</p>	None noted	Compliant	
MANAGEMENT PLANS / MONITORING PROGRAMS				
S2 C11	With the approval of the Planning Secretary, the Applicant may submit any management plan or monitoring program required by this consent on a progressive basis.	Noted	Compliant	
DEMOLITION				
S2 C12	The Applicant must ensure that all demolition work is carried out in accordance with AS 2601-2001: The Demolition of Structures, or its latest version.	None noted	Compliant	
PROTECTION OF PUBLIC INFRASTRUCTURE				
S2 C13	<p>The Applicant must:</p> <ul style="list-style-type: none"> (c) repair, or pay all reasonable costs associated with repairing, any public infrastructure that is damaged by the development; and (d) relocate, or pay all reasonable costs associated with relocating, any public infrastructure that needs to be relocated as a result of the development. 	Noted	Compliant	
OPERATION OF PLANT AND EQUIPMENT				
S2 C14	<p>The Applicant must ensure that all plant and equipment used at the site is:</p> <ul style="list-style-type: none"> (c) maintained in a proper and efficient condition; and (d) operated in a proper and efficient condition. 	Noted	Compliant	
CROWN LAND				
S2 C15	The Applicant must not commence any development authorised by this consent on Crown land without the prior approval of the DPIE Crown Lands.	None noted	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
SECTION 94 CONTRIBUTIONS				
S2 C16	The Applicant must pay a monthly contribution to the Council for the upgrade and maintenance of roads in accordance with Baulkham Hills Shire Council's section 94 plan in force at the date of this consent.	Section 7.11 Debtor Invoices from Hills Council have been sighted	Compliant	
SCHEDULE 3 – ENVIRONMENTAL PERFORMANCE				
IDENTIFICATION OF BOUNDARIES				
S3 C1	<p>Within 3 months of the date of this consent, or as otherwise agreed by the Planning Secretary, the Applicant must:</p> <ul style="list-style-type: none"> (a) engage an independent registered surveyor to survey the boundaries of the approved limit of extraction and the approved ancillary work areas; (b) submit a survey plan of these boundaries to the Planning Secretary; and (c) ensure that these boundaries are clearly marked at all times in a permanent manner that allows operating staff and inspecting officers to clearly identify those limits. <p>Note: The limit of extraction and ancillary areas is shown conceptually on the layout plans in Appendix 2, as amended/clarified by the conditions below.</p>	Cannot provide soft copy of approved survey plan. Physical copy sighted.	Compliant	If practical to scan or digitise original survey plan
GENERAL LIMITS OF EXTRACTION				
S3 C2	<p>Notwithstanding the layout plans in Appendix 2, the Applicant must not undertake extraction within:</p> <ul style="list-style-type: none"> (a) 30 metres of Hitchcock Road; and (b) 10 metres of the property boundary of Lot 2 DP 555184, unless sand extraction has commenced on that lot, and extraction in this buffer has been agreed by the Planning Secretary. 	<p>Noted – Extraction is compliant with condition.</p> <p>PF Formation self-reported 1 non-compliance in relation to (b) the buffer zone. However, it was later identified to no longer be applicable as PF Formation had purchased Lot 2 on 15 October. Evidence of department consultation on the matter has been sighted.</p>	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
MAXIMUM EXTRACTION DEPTH MAP				
S3 C3	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) establish the wet weather groundwater level for the site based on all available (and at least 12 months) site specific groundwater monitoring data; (b) engage a suitably qualified and experienced expert to establish the maximum extraction depths to which extraction can be undertaken on site, to comply with condition 9 of Schedule 2; (c) submit a Maximum Extraction Depth Map (contour map or similar) for the development to the Planning Secretary within 3 months of the date of this consent; and (d) comply with the extraction depths specified in the map, to the satisfaction of the Planning Secretary. 	Relevant documents sighted. SHELL provided in 2023 Audit report.	Compliant	
S3 C4	Within 3 months of the completion of the Independent Environmental Audit (see condition 6 of Schedule 5), the Applicant must review and update the Maximum Extraction Depth Map for the development to the satisfaction of the Planning Secretary.	Noted	Compliant	Within 3 months of the completion of the IEA PF Formation to provide evidence of review and update the Maximum Extraction Depth Map for the development to the satisfaction of the Planning Secretary.
NOISE				
S3 C5	<p>Operational Noise Assessment Criteria</p> <p>The Applicant must ensure that the noise generated by the development does not exceed the noise impact assessment criteria in Table 1 at any residence or on more than 25 per cent of any privately-owned land.</p>	Noise monitoring results have been included in AEMRs. No exceedances noted during the audit period.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations																																							
	<table border="1"> <thead> <tr> <th rowspan="2">Noise Assessment Location</th> <th>Day</th> <th colspan="2">Night</th> </tr> <tr> <th>L_{Aeq} (15 minute)</th> <th>L_{Aeq} (15 minute)</th> <th>L_{A1} (1 minute)</th> </tr> </thead> <tbody> <tr> <td>R1 - Hammond</td> <td>41</td> <td>35</td> <td>45</td> </tr> <tr> <td>R2 - Hitchcock</td> <td>40</td> <td>35</td> <td>45</td> </tr> <tr> <td>R5 - Pignataro</td> <td>42</td> <td>35</td> <td>45</td> </tr> <tr> <td>R6 - Camilleri</td> <td>40</td> <td>35</td> <td>45</td> </tr> <tr> <td>R7 - Maroota Public School</td> <td>36(L_{Aeq}(1 Hour))</td> <td>N/A</td> <td>N/A</td> </tr> <tr> <td>R8 - Portelli</td> <td>39</td> <td>35</td> <td>45</td> </tr> <tr> <td>R9 - Young</td> <td>39</td> <td>35</td> <td>45</td> </tr> <tr> <td>R10 - Tornatola</td> <td>39</td> <td>35</td> <td>45</td> </tr> </tbody> </table> <p>Table 1: Noise Impact Assessment Criteria Notes:</p> <ul style="list-style-type: none"> To determine compliance with the L_{Aeq}(15 minute) noise limits, noise from the development is to be measured at the most affected point within the residential boundary, or at the most affected point within 30 metres of the dwelling where the dwelling is more than 30 metres from the boundary. Where it can be demonstrated that direct measurement of noise from the development is impractical, alternative means of determining compliance may be accepted (see Chapter 11 of the NSW Industrial Noise Policy). The modification factors in Section 4 of the NSW Industrial Noise Policy must also be applied to the measured noise level where applicable. To determine compliance with the L_{A1}(1 minute) limit, noise from the development is to be measured at 1 metre from the dwelling façade. The noise limits apply under meteorological conditions of: <ul style="list-style-type: none"> wind speed up to 3m/s at 10m above ground level; temperature inversion conditions of up to 3 degrees C/100m and wind speed up to 2m/s at 10m above the ground; where the wind velocity and temperature gradients are determined to be relevant to the development site in accordance with the NSW Industrial Noise Policy. The Planning Secretary may relax the noise limits in Table 1 for any property where the Applicant has an agreement with the relevant owner/s to generate higher noise levels, and the Applicant has advised the Department in writing of the terms of this agreement. For more information on the noise assessment locations see Appendix 4. 	Noise Assessment Location	Day	Night		L _{Aeq} (15 minute)	L _{Aeq} (15 minute)	L _{A1} (1 minute)	R1 - Hammond	41	35	45	R2 - Hitchcock	40	35	45	R5 - Pignataro	42	35	45	R6 - Camilleri	40	35	45	R7 - Maroota Public School	36(L _{Aeq} (1 Hour))	N/A	N/A	R8 - Portelli	39	35	45	R9 - Young	39	35	45	R10 - Tornatola	39	35	45			
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S3 C6	<p>Cumulative Noise Criteria</p> <p>The Applicant must take all reasonable and feasible measures to ensure that the noise generated by the development combined with the noise generated by other extractive industries does not exceed the following amenity criteria on any privately owned land, to the satisfaction of the Planning Secretary:</p>	Noise monitoring results have been included in AEMRs. No exceedances noted during the audit period.	Compliant																																								

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations																									
	<ul style="list-style-type: none"> • LAeq(11 hour) 50 dB(A) – Day; • LAeq(4 hour) 45 dB(A) – Evening; and • LAeq(9 hour) 40 dB(A) – Night. 																												
S3 C7	<p>Operating Hours The Applicant must comply with the operating hours in Table 2.</p> <table border="1"> <thead> <tr> <th>Activity</th> <th>Day</th> <th>Time</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Construction work</td> <td>Monday - Friday</td> <td>7.00am to 6.00pm</td> </tr> <tr> <td>Saturday</td> <td>8.00am to 1.00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>None</td> </tr> <tr> <td rowspan="2">Quarrying and Processing, (inc. overburden removal)</td> <td>Monday – Saturday</td> <td>7.00am to 6.00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>None</td> </tr> <tr> <td rowspan="2">Product Transportation</td> <td>Monday – Saturday</td> <td>6.00am to 6.00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>None</td> </tr> <tr> <td rowspan="2">Maintenance</td> <td>Monday – Saturday</td> <td>7.00am to 6.00pm</td> </tr> <tr> <td>Sunday and Public Holidays</td> <td>None</td> </tr> </tbody> </table> <p><i>Table 2: Operating Hours</i></p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> • Product transportation prior to 7.00am is restricted as per condition 8 of Schedule 2. • Maintenance activities may be conducted outside the hours in Table 2 provided that the activities are not audible at any residence beyond the boundary of the site. • <i>This condition does not apply to delivery of material if that delivery is required by police or other authorities for safety reasons, and/or the operation or personnel or equipment are endangered. In such circumstances, notification is to be provided to the EPA and the Department and the affected residents as soon as possible, or within a reasonable period in the case of emergency.</i> 	Activity	Day	Time	Construction work	Monday - Friday	7.00am to 6.00pm	Saturday	8.00am to 1.00pm	Sunday and Public Holidays	None	Quarrying and Processing, (inc. overburden removal)	Monday – Saturday	7.00am to 6.00pm	Sunday and Public Holidays	None	Product Transportation	Monday – Saturday	6.00am to 6.00pm	Sunday and Public Holidays	None	Maintenance	Monday – Saturday	7.00am to 6.00pm	Sunday and Public Holidays	None	Records of vehicle movements are under limits.	Compliant	
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	Sunday and Public Holidays	None																											
S3 C8	<p>Noise Management Plan The Applicant must prepare and implement a Noise Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ol style="list-style-type: none"> be submitted to the Planning Secretary within 3 months of the date of this consent; be prepared in consultation with the EPA; include details of how the noise performance of the development would be monitored, and include a noise monitoring protocol for evaluating compliance with the relevant noise limits in this consent; and 	Updated NMP approved by department June 2022. Letter sighted.	Compliant																										

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations															
	<p>(d) include an investigation and assessment (including modelling) of additional reasonable and feasible noise mitigation measures that would be implemented to ensure that noise emissions at all stages of the development comply with the noise impact assessment criteria in Table 1.</p> <p>Note: The EA predicted that receiver locations R5, R6, R9 and R10 would exceed the applicable noise criteria by between 2 and 5 decibels, during worst case operations.</p>																		
S3 C9	<p>If the additional noise mitigation measures identified in condition 8(d) are not able to reduce noise levels to within 2 decibels of the impact assessment criteria in Table 1 then, upon receiving a written request from the applicable landowner, the Applicant must implement additional noise mitigation measures such as double glazing, insulation, and/or air conditioning at any residence on the land in consultation with the landowner.</p> <p>These additional mitigation measures must be reasonable and feasible.</p> <p>If within 3 months of receiving this request from the landowner, the Applicant and the landowner cannot agree on the measures to be implemented, or there is a dispute about the implementation of these measures, then either party may refer the matter to the Planning Secretary for resolution.</p>	Noted	Not Triggered																
AIR QUALITY																			
S3 C10	<p>Impact Assessment Criteria</p> <p>The Applicant must ensure that dust generated by the development does not cause exceedances of the criteria listed in Tables 3, 4 and 5 at any residence or on more than 25 per cent of any privately owned land.</p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Total suspended particulate (TSP) matter</td> <td>Annual</td> <td>90 µg/m³</td> </tr> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>Annual</td> <td>30 µg/m³</td> </tr> </tbody> </table> <p><i>Table 3: Long Term Impact Assessment Criteria for Particulate Matter</i></p> <table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Criterion</th> </tr> </thead> <tbody> <tr> <td>Particulate matter < 10 µm (PM₁₀)</td> <td>24 hour</td> <td>50 µg/m³</td> </tr> </tbody> </table> <p><i>Table 4: Short Term Impact Assessment Criteria for Particulate Matter</i></p>	Pollutant	Averaging period	Criterion	Total suspended particulate (TSP) matter	Annual	90 µg/m ³	Particulate matter < 10 µm (PM ₁₀)	Annual	30 µg/m ³	Pollutant	Averaging period	Criterion	Particulate matter < 10 µm (PM ₁₀)	24 hour	50 µg/m ³	Air quality monitoring results have been included in AEMRs. No exceedances noted during the audit period.	Compliant	
Pollutant	Averaging period	Criterion																	
Total suspended particulate (TSP) matter	Annual	90 µg/m ³																	
Particulate matter < 10 µm (PM ₁₀)	Annual	30 µg/m ³																	
Pollutant	Averaging period	Criterion																	
Particulate matter < 10 µm (PM ₁₀)	24 hour	50 µg/m ³																	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations								
	<table border="1"> <thead> <tr> <th>Pollutant</th> <th>Averaging period</th> <th>Maximum increase in deposited dust level</th> <th>Maximum total deposited dust level</th> </tr> </thead> <tbody> <tr> <td>Deposited dust</td> <td>Annual</td> <td>2 g/m²/month</td> <td>4 g/m²/month</td> </tr> </tbody> </table> <p><i>Table 5: Long Term Impact Assessment Criteria for Deposited Dust</i></p> <p>Note: Deposited dust is assessed as insoluble solids as defined by Standards Australia, 1991, AS 3580.10.1-1991: Methods for Sampling and Analysis of Ambient Air - Determination of Particulates - Deposited Matter - Gravimetric Method.</p>	Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level	Deposited dust	Annual	2 g/m ² /month	4 g/m ² /month			
Pollutant	Averaging period	Maximum increase in deposited dust level	Maximum total deposited dust level									
Deposited dust	Annual	2 g/m ² /month	4 g/m ² /month									
S3 C11	<p>Operating Conditions</p> <p>The Applicant must ensure any visible air pollution generated by the development is assessed regularly, and that quarrying operations are relocated, modified, and/or stopped as required to minimise air quality impacts on privately owned land.</p>	No complaints noted during audit period.	Compliant									
S3 C12	<p>Air Quality Monitoring</p> <p>The Applicant must prepare and implement an Air Quality Monitoring Program for the development to the satisfaction of the Planning Secretary. This program must:</p> <ul style="list-style-type: none"> (c) be submitted to the Planning Secretary for approval within 3 months of the date of this consent; (d) be prepared in consultation with the EPA; (e) include details of how the air quality performance of the development would be monitored, providing for additional dust deposition monitoring in the vicinity of clusters of residences to the north and west of the site; and (f) include a protocol for evaluating compliance with the relevant air quality criteria in this consent. 	Updated plan approved by DPE September 2022. Approval letter sighted.	Compliant									
METEOROLOGICAL MONITORING												
S3 C13	The Applicant must ensure the development has a suitable meteorological station on the site or in the immediate vicinity that complies with the requirements in the Approved Methods for Sampling of Air Pollutants in New South Wales publication.	Met station status and details provided by PF Formation	Compliant									
WATER												
S3 C14	The Applicant must ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of operations to match its water supply.	WAL42252 and WAL42259 Sighted	Compliant									

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<i>Note: The Applicant is required to obtain necessary water licences for the development under the Water Act 1912 and/or Water Management Act 2000.</i>			
S3 C15	Discharges The Applicant must not discharge any water from the quarry or its associated operations except in accordance with an EPL.	Noted – no discharges noted in AMER. Confirm with site	Compliant	
S4 C16	Water Management and Monitoring The Applicant must prepare and implement a Water Management Plan for the development to the satisfaction of the Planning Secretary. This plan must: (a) be submitted to the Planning Secretary within 3 months of the date of this consent; (b) be prepared in consultation with DPIE Water and the EPA; and (c) include a: <ul style="list-style-type: none"> • Site Water Balance; • Erosion and Sediment Control Plan; • Surface Water Monitoring Program; and • Groundwater Monitoring Program. 	Updated WMP Submitted March 2022. Further changed requested by DPE water requiring the WMP to be withdrawn to address the changes. WMP updates are currently in progress, with no due date issued by DPE.	Compliant	
S3 C17	The Site Water Balance must: (a) include details of: <ul style="list-style-type: none"> • sources and security of water supply; • water use on site; • water management on site, including the location and capacity of water storages on site and the means of access; • off-site water transfers; and • reporting procedures; and (b) investigate and describe measures to minimise water use by the development.	As above.	Compliant	
S3 C18	The Erosion and Sediment Control Plan must: (a) be consistent with the requirements of Managing Urban Stormwater: Soils and Construction, Volume 1, 4th Edition, 2004 (Landcom); (b) identify activities that could cause soil erosion and generate sediment;	The 2016 Water Management Plan contains water balance, erosion and sediment control plan, surface water monitoring program and groundwater monitoring program. However, refer to S4 C16.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<ul style="list-style-type: none"> (c) describe measures to minimise soil erosion and the potential for the transport of sediment to downstream waters; (d) describe the location, function, and capacity of erosion and sediment control structures; (e) demonstrate that the design capacity of basins intended to collect storm runoff will not be compromised by storage of operational water; and (f) describe what measures would be implemented to maintain (and if necessary decommission) the structures over time. 			
C3 S19	<p>The Surface Water Monitoring Program must include:</p> <ul style="list-style-type: none"> (a) detailed baseline data on surface water flows and quality in downstream watercourses that could be affected by the development; (b) surface water quality and stream health assessment criteria, including trigger levels for investigating any potentially adverse surface water impacts; and (c) a program to monitor: <ul style="list-style-type: none"> • surface water flows, quality, and impacts on water users; • stream health; and • channel stability. 	Refer to S4 C16.	Compliant	
S3 C20	<p>The Groundwater Monitoring Program must include:</p> <ul style="list-style-type: none"> (a) provision of additional monitoring bores around the periphery of the site; (b) detailed baseline data on groundwater levels, flows and quality in the region, and particularly any groundwater bores, springs and seeps (including spring and seep fed dams) that may be affected by operations on site; (c) groundwater assessment criteria, including trigger levels for investigating any potentially adverse groundwater impacts; (d) a program to monitor: <ul style="list-style-type: none"> • groundwater levels and quality in new and existing monitoring bores; • the impacts of the development on: any groundwater bores, springs and seeps (including spring and seep fed farm dams) on privately-owned land; and any groundwater dependent ecosystems; and 	Refer to S4 C16.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations								
	(e) a protocol for further groundwater modelling to confirm the limits to excavation depth across the site permitted in accordance with condition 9 of Schedule 2.											
LANDSCAPE MANAGEMENT												
S3 C21	<p>Rehabilitation</p> <p>The Applicant must progressively rehabilitate the site to the satisfaction of the Planning Secretary, in a manner that is generally consistent with the concept final landform (Strategy A or Strategy B) in the preferred project report (as reproduced in Appendix 7).</p>	The Landscape Management Plan contains details for the ongoing rehabilitation of the site and offset strategies. Updated management plans were approved June 2022.	Compliant									
S3 C22	<p>Offset Strategy</p> <p>The Applicant must implement the Offset Strategy described in the preferred project report, and summarised in Table 6 (shown conceptually on the plan in Appendix 5), to the satisfaction of the Planning Secretary.</p> <table border="1"> <thead> <tr> <th>Area</th> <th>Minimum Size (hectares)</th> </tr> </thead> <tbody> <tr> <td>On-Site Revegetation Area (SHTW)</td> <td>7.9</td> </tr> <tr> <td>On-Site Revegetation Area (Other Woodland)</td> <td>4.1</td> </tr> <tr> <td>Total</td> <td>12</td> </tr> </tbody> </table> <p><i>Table 6: Offset Strategy</i></p>	Area	Minimum Size (hectares)	On-Site Revegetation Area (SHTW)	7.9	On-Site Revegetation Area (Other Woodland)	4.1	Total	12	The Landscape Management Plan contains details for the ongoing rehabilitation of the site and offset strategies. Updated management plan approved June 2022.	Compliant	
Area	Minimum Size (hectares)											
On-Site Revegetation Area (SHTW)	7.9											
On-Site Revegetation Area (Other Woodland)	4.1											
Total	12											
S3 C23	<p>Within 3 years of the date of this consent, the Applicant must make suitable arrangements to provide appropriate long term security for the offset areas to the satisfaction of the Planning Secretary.</p> <p><i>Note: The Department acknowledges that the arrangements may provide for staged or delayed implementation, in accordance with the extraction in these areas.</i></p>	The Landscape Management Plan contains details for the ongoing rehabilitation of the site and offset strategies. Updated management plan approved June 2022.	Compliant									
S3 C24	<p>Landscape Management Plan</p> <p>The Applicant must prepare and implement a Landscape Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared in consultation with BCD by suitably qualified expert/s whose appointment/s have been approved by the Planning Secretary; (b) be submitted to the Planning Secretary for approval within 6 months of the date of this consent; and 	Refer to S3 C23.	Compliant									

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	(c) include a: <ul style="list-style-type: none"> • Rehabilitation and Offset Management Plan; and • Quarry Closure Plan. 			
S3 C25	<p>Rehabilitation and Offset Management Plan</p> <p>The Rehabilitation and Offset Management Plan must include:</p> <p>(a) the rehabilitation objectives for the site, vegetation offsets and landscaping;</p> <p>(b) a description of the short, medium, and long term measures that would be implemented to:</p> <ul style="list-style-type: none"> • rehabilitate the site; • implement the Offset Strategy; and • maintain and enhance existing site vegetation outside the disturbance area; <p>(c) detailed performance and completion criteria for the site rehabilitation and implementation of the Offset Strategy;</p> <p>(d) a detailed description of the measures that would be implemented over the next 3 years, including the procedures to be implemented for:</p> <ul style="list-style-type: none"> • progressively rehabilitating disturbed areas; • implementing vegetation offsets; • protecting vegetation and soil outside the disturbance areas; • rehabilitating creeks and drainage lines on the site to ensure no net loss of stream length and aquatic habitat; • undertaking pre-clearance surveys; • managing impacts on fauna; • landscaping the site to minimise visual impacts; • conserving and reusing topsoil; • collecting and propagating seed for rehabilitation works; • salvaging and reusing material from the site for habitat enhancement; • controlling weeds and feral pests; • controlling access; and • bushfire management; 	<p>Refer to S3 C23.</p> <p>Site conditions generally in good condition and periodic monitoring and site maintenance observed. However, some High Threat Weeds (HTWs) such as Pampas Grass were observed in patches.</p>	Compliant	When and where required carry out additional weed management to reduce the spread of HTWs.

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<p>(e) a program to monitor the effectiveness of these measures, and progress against the performance and completion criteria;</p> <p>(f) a description of the potential risks to successful rehabilitation and/or revegetation, and a description of the contingency measures that would be implemented to mitigate these risks; and</p> <p>(g) details of who would be responsible for monitoring, reviewing, and implementing the plan.</p>			
S3 C26	<p>The Quarry Closure Plan must:</p> <p>(a) include provision for certification from a qualified geotechnical engineer that the final proposed landform is stable;</p> <p>(b) define the objectives and criteria for closure of the quarry;</p> <p>(c) investigate options for the future use of the site, including any final void;</p> <p>(d) describe the measures that would be implemented to minimise or manage the ongoing (post closure) environmental effects of the development; and</p> <p>(e) describe how the performance of these measures would be monitored over time.</p>	Refer to S3 C23.	Compliant	
S3 C27	<p>Rehabilitation and Offset Bond</p> <p>Within 3 months of the approval of the Landscape Management Plan, the Applicant must lodge a rehabilitation and offset bond for the development with the Planning Secretary. The sum of the bond must be calculated at:</p> <p>(a) \$2.50/m² for the area of disturbance in each 3 year review period, including the offset areas; and</p> <p>(b) \$1.00/m² for the total area of land previously disturbed by the quarry, or as otherwise directed by the Planning Secretary.</p> <p><i>Notes:</i></p> <ul style="list-style-type: none"> <i>If the rehabilitation and offsets are completed to the satisfaction of the Planning Secretary, the Planning Secretary will release the bond.</i> <i>If the rehabilitation and/or offsets are not completed to the satisfaction of the Planning Secretary, the Planning Secretary will call in all or part of the bond, and arrange for the satisfactory completion of the relevant works.</i> 	Noted	Not triggered	
ABORIGINAL HERITAGE				
S3 C28	Should the Applicant discover material suspected of being Aboriginal relics or skeletal remains, work in that area must cease and the Applicant must advise Heritage NSW and proceed in accordance with Heritage NSW instructions.	Noted	Not triggered	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
ABORIGINAL HERITAGE				
S3 C29	<p>Materials Transport</p> <p>The Applicant must transport all excavated material between the extraction site and processing plant site, including processing residues, via slurry pipelines.</p> <p><i>Note: When the slurry system is unusable by reason of breakdown or essential maintenance, extractive material may be transported by truck during the period of such breakdown or maintenance. The Applicant must ensure that such periods are as brief as possible and must advise the Council each day that truck transport is to be used.</i></p>	Noted – no change on-site	Compliant	
S3 C30	<p>Haulage Records</p> <p>The Applicant must record and maintain a log of the extraction quantities and traffic movement in and out of the site, available for inspection at the request of the Planning Secretary or the Council.</p>	Records sighted	Compliant	
S3 C31	<p>Road Haulage</p> <p>The Applicant must ensure that:</p> <ul style="list-style-type: none"> (a) all loaded vehicles entering or leaving the site are covered; and (b) all loaded vehicles leaving the site are cleaned of materials that may fall on the road, before they leave the site. 	Operations compliant during site inspection	Compliant	
S3 C31A	<p>Traffic Management Plan</p> <p>The Applicant must prepare a Traffic Management Plan for the development to the satisfaction of the Planning Secretary. This plan must:</p> <ul style="list-style-type: none"> (a) be prepared by suitably qualified and experienced person/s whose appointment has been endorsed by the Planning Secretary; (b) be prepared in consultation with TfNSW and Council; (c) include details of all haulage transport routes within the Council local government area and vehicle types to be used for development-related traffic; (d) include details of the measures to be implemented to minimise traffic safety issues and disruption to local road users, including minimising potential for conflict with school buses; (e) include a Drivers' Code of Conduct that includes procedures requiring that drivers: <ul style="list-style-type: none"> (i) adhere to posted speed limits or other required travelling speeds; (ii) adhere to designated transport routes; and 	PF Formation provided updated Traffic Management Plan (TMP), this has been submitted for approval. However, DPE has requested additional information with changes to be made by 15 September 2023.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<ul style="list-style-type: none"> (iii) implement safe and quiet driving practices; (f) describe the measures to be put in place to ensure compliance with the Drivers' Code of Conduct; and (g) propose measures to minimise the transmission of dust and tracking of material onto the surface of public roads from vehicles exiting the site. <p>The Applicant must implement the Traffic Management Plan as approved by the Planning Secretary.</p>			
VISUAL				
S3 C32	<p>Visual Amenity</p> <p>The Applicant must minimise the visual impacts of the development to the satisfaction of the Planning Secretary.</p>	Bunds and visual screening observed in place during site inspection.	Compliant	
S3 C33	<p>Lighting Emissions</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) take all practicable measures to mitigate off-site lighting impacts from the development; and (b) ensure that all external lighting associated with the development complies with Australian Standard AS4282 (INT) 1995 – Control of Obtrusive Effects of Outdoor Lighting, to the satisfaction of the Planning Secretary. 	Confirmed during site inspection.	Compliant	
S3 C34	<p>Advertising</p> <p>The Applicant must not erect or display any advertising structure(s) or signs on the site without the written approval of the Planning Secretary.</p> <p>Note: This does not include traffic management and safety or environmental signs.</p>	Site inspection confirmed signs are consistent with those approved signs present during the previous audit.	Compliant	
WASTE MANAGEMENT				
S3 C35	<p>Waste Minimisation</p> <p>The Applicant can import:</p> <ul style="list-style-type: none"> (a) VENM to the site; (b) ENM to the site only for the purpose of engineering fill or use in earthworks; and (c) materials permitted by an EPL, where an applicable Resource Recovery Order and Exemption, issued in accordance with Clauses 91 and 92 of the Protection of the Environment 	Confirmed compliant during site inspection.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<p>Operations (Waste) Regulation 2014 (or its latest amendment), is in place and which allows the material to be received for processing with extractive materials or application to land.</p> <p>Note: No other materials classified as waste under the Protection of the Environment Operations (Waste) Regulation 2014 (or its latest amendment) are to be received or processed on the site.</p>			
S3 C35A	<p>The Applicant must:</p> <ul style="list-style-type: none"> (a) verify any VENM and ENM received has appropriate documentation demonstrating that it is VENM and ENM; (b) maintain accurate records of all VENM and ENM received at the site (including the date, time, quantity received and verification documentation (refer 35A(a)); (c) include a summary of these records in the Annual Review; (d) minimise the amount of waste generated by the development; (e) ensure that the waste generated by the development is appropriately stored, handled, and disposed of; and (f) report on waste minimisation and management in the Annual Review. 	Records provided by PF Formation.	Compliant	
EMERGENCY AND HAZARDS MANAGEMENT				
S3 C36	<p>Dangerous Goods</p> <p>The Applicant must ensure that the storage, handling, and transport of dangerous goods are conducted in accordance with the relevant Australian Standards, particularly AS1940 and AS1596, and the Dangerous Goods Code.</p>	Confirmed compliant during site inspection	Compliant	
S3 C37	<p>Safety</p> <p>The Applicant must secure the development to ensure public safety to the satisfaction of the Planning Secretary.</p>	Confirmed compliant during site inspection	Compliant	
S3 C38	<p>Bushfire Management</p> <p>The Applicant must:</p> <ul style="list-style-type: none"> (a) ensure that the development is suitably equipped to respond to any fires on-site; and (b) assist the Rural Fire Service and emergency services as much as possible if there is a fire on site. 	PIRMP available on PF Formation website	Compliant	
PRODUCTION DATA				
S3 C39	The Applicant must:	Data sighted and provided in AEMR	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	(a) provide annual production data to the MEG using the standard form for that purpose; and (b) include a copy of this data in the Annual Review.			
SCHEDULE 4 – ADDITIONAL PROCEDURES				
NOTIFICATION OF LANDOWNERS				
S4 C1	If the results of monitoring required in Schedule 3 identify that impacts generated by the development are greater than the relevant impact assessment criteria, then the Applicant must notify the Planning Secretary and the affected landowners and/or existing or future tenants accordingly, and provide quarterly monitoring results to each of these parties until the results show that the development is complying with the relevant criteria.	Noted – not triggered.	Not triggered	
INDEPENDENT REVIEW				
S4 C2	If a landowner of privately owned land considers that the operations of the quarry are exceeding the impact assessment criteria in Schedule 3, then he/she may ask the Applicant in writing for an independent review of the impacts of the development on his/her land. If the Planning Secretary is satisfied that an independent review is warranted, the Applicant must within 3 months of the Planning Secretary advising that an independent review is warranted: <ul style="list-style-type: none"> (a) consult with the landowner to determine his/her concerns; (b) commission a suitably qualified, experienced and independent person, whose appointment has been approved by the Planning Secretary, to conduct monitoring on the land, to determine whether the development is complying with the relevant criteria in Schedule 3, and identify the source(s) and scale of any impact on the land, and the development's contribution to this impact; and (c) give the Planning Secretary and landowner a copy of the independent review. 	Noted – not triggered.	Not triggered	
S4 C3	If the independent review determines that the quarrying operations are complying with the relevant criteria in Schedule 3, then the Applicant may discontinue the independent review with the approval of the Planning Secretary.	Noted	Compliant	
S4 C4	If the independent review determines that the quarrying operations are not complying with the relevant criteria in Schedule 3, and that the quarry is primarily responsible for this non-compliance, then the Applicant must:	Noted	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<p>(a) implement all reasonable and feasible measures, in consultation with the landowner, to ensure that the development complies with the relevant criteria; and</p> <p>(b) conduct further monitoring to determine whether these measures ensure compliance; or</p> <p>(c) secure a written agreement with the landowner to allow exceedances of the relevant criteria in Schedule 3, to the satisfaction of the Planning Secretary.</p> <p>If the additional monitoring referred to above subsequently determines that the quarrying operations are complying with the relevant criteria in Schedule 3, then the Applicant may discontinue the independent review with the approval of the Planning Secretary.</p> <p>If the Applicant is unable to finalise an agreement with the landowner, then the Applicant or landowner may refer the matter to the Planning Secretary for resolution.</p> <p>If the matter cannot be resolved within 21 days, the Planning Secretary must refer the matter to an Independent Dispute Resolution Process (see Appendix 8).</p>			
S4 C5	<p>If the landowner disputes the results of the independent review, either the Applicant or the landowner may refer the matter to the Planning Secretary for resolution.</p> <p>If the matter cannot be resolved within 21 days, the Planning Secretary must refer the matter to an Independent Dispute Resolution Process (see Appendix 8).</p>	No disputes noted	Compliant	
SCHEDULE 5 – ENVIRONMENTAL MANAGEMENT, MONITORING, REPORTING & AUDITING				
ENVIRONMENTAL MANAGEMENT STRATEGY				
S5 C1	<p>1. The Applicant must prepare and implement an Environmental Management Strategy for the development to the satisfaction of the Planning Secretary. This strategy must be submitted to the Planning Secretary within 3 months of the date of this consent, and;</p> <p>(a) provide the strategic context for environmental management of the development;</p> <p>(b) identify the statutory requirements that apply to the development;</p> <p>(c) describe in general how the environmental performance of the development would be monitored and managed;</p>	<p>Majority of management plans were updated post the previous audit and approved in 2022. Records of approval for these were observed.</p> <p>With the exception of the WMP referred to in S4 C16, and the TMP in S3 C31A.</p>	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<p>(d) describe the procedures that would be implemented to:</p> <ul style="list-style-type: none"> keep the local community and relevant agencies informed about the construction, operation and environmental performance of the development; receive, handle, respond to, and record complaints; resolve any disputes that may arise during the life of the development; respond to any non-compliance; manage cumulative impacts; and respond to emergencies; and <p>(e) describe the role, responsibility, authority, and accountability of the key personnel involved in the environmental management of the development.</p>			
ENVIRONMENTAL MONITORING PROGRAM				
S5 C2	The Applicant must prepare an Environmental Monitoring Program for the development to the satisfaction of the Planning Secretary. This program must be submitted to the Planning Secretary concurrently with the submission of the various monitoring programs and consolidate the various monitoring requirements in Schedule 3 of this consent into a single document.	Management plans were updated post the previous audit in 2022. Records of approval for these were observed. With the exception of the WMP referred to in S4 C16, and the TMP in S3 C31A.	Compliant	
REPORTING AND AUDITING				
S5 C3	Incident Notification The Applicant must notify the Department and any other relevant agencies immediately after it becomes aware of an incident. The notification must be in writing via the Department's Major Projects Website and identify the development (including the development application number and name) and set out the location and nature of the incident.	No incidents noted during this audit period	Not triggered.	
S5 C4	Non-Compliance Notification 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 Department's 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-	During the audit period PF Formation self-reported one non-compliance in relation to S3 C2(b) relating to the buffer zone. This was later dismissed as not applicable (refer to S3 C2(b)).	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	compliance (if known) and what actions have been, or will be, undertaken to address the non-compliance.			
S5 C5	<p>Annual Reporting</p> <p>Within 12 months of the date of this consent, and annually thereafter, the Applicant must submit an Annual Review to the Planning Secretary, relevant agencies and CCC. This report must:</p> <ul style="list-style-type: none"> (a) identify the standards and performance measures that apply to the development; (b) describe the works that will be carried out in the next 12 months; (c) include a summary of the complaints received during the past year, and compare this to the complaints received in previous years; (d) include a summary of the monitoring results for the development during the past year; (e) include an analysis of these monitoring results against the relevant: <ul style="list-style-type: none"> • impact assessment criteria/limits; • monitoring results from previous years; and • predictions in the EA; (f) identify any trends in the monitoring results over the life of the development; (g) identify any non-compliance during the previous year; and (h) describe what actions were, or are being, taken to ensure compliance. 	Annual review submitted to secretary. Evidence of submission provided by PF Formation.	Compliant	
INDEPENDENT ENVIRONMENTAL AUDIT				
S5 C6	<p>Within 12 months of the date of this consent, and every 3 years thereafter, unless the Planning Secretary directs otherwise, the Applicant must commission and pay the full cost of an Independent Environmental Audit of the development. This audit must:</p> <ul style="list-style-type: none"> (a) be conducted by a suitably qualified, experienced, and independent person(s) whose appointment has been approved by the Planning Secretary; (b) include consultation with the relevant agencies; (c) assess the environmental performance of the development, and its effects on the surrounding environment; 	Noted – this audit	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<p>(d) assess whether the development is complying with the relevant standards, performance measures and statutory requirements; and</p> <p>(e) review the adequacy of any strategy/plan/program required under this consent, and, if necessary, recommend measures or actions to improve the environmental performance of the development, and/or any strategy/plan/program required under this consent.</p> <p>Note: The person(s) conducting the audit should have expertise in flora and fauna assessment, hydrogeology and quarry rehabilitation.</p>			
S5 C7	Within 6 weeks of completion of each Independent Environmental Audit, the Applicant must submit a copy of the audit report to the Planning Secretary, with a response to any of the recommendations in the audit report.	Noted	Compliant	
S5 C8	<p>Within 3 months of submitting a copy of the audit report to the Planning Secretary, the Applicant must review and if necessary revise:</p> <p>(a) each of the environmental management and monitoring strategies/plans/programs in Schedules 3 and 5; and</p> <p>(b) the sum of the Vegetation Offset Bond (see Schedule 3). This review must consider:</p> <ul style="list-style-type: none"> • the effects of inflation; • any changes to the total area of disturbance; and • the performance of the vegetation offsets against the completion criteria of the Rehabilitation and Vegetation Offset Management Plan, <p>to the satisfaction of the Planning Secretary</p>	Noted	Compliant	
COMMUNITY CONSULTATIVE COMMITTEE				
S5 C9	<p>The Applicant must establish a Community Consultative Committee (CCC) for the development to the satisfaction of the Planning Secretary, in general accordance with the Department's Guideline for Establishing and Operating Community Consultative Committees for Mining Projects.</p> <p>Note: The Applicant may continue the operation of the Liaison and Review Committee established under condition 6.7 of the development consent issued by the Land and Environment Court on 14 July 1998 to fulfil this condition.</p>	Noted – documents are publicly available on the PF Formation website.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
ACCESS TO INFORMATION				
S5 C10	<p>Within 1 month of the approval of any plan/strategy/program required under this consent (or any subsequent revision of these plans/strategies/programs), or the completion of the audits or an Annual Review required under this consent, the Applicant must:</p> <ul style="list-style-type: none"> (a) provide a copy of the relevant document/s to the relevant agencies and to members of the general public upon request; and (b) ensure that a copy of the relevant document/s is made publicly available on its website and at the Applicant's office. 	<p>Noted – documents are publicly available on the PF Formation website.</p> <p>Documents were observed and downloaded, however the PF Formation website could be more user friendly to allow easier access/site navigation and interpretation of reporting results.</p>	Compliant	Ensure documents are regularly uploaded online and easily located by the public
S5 C11	<p>During the development, the Applicant must:</p> <ul style="list-style-type: none"> (a) make a summary of monitoring results required under this consent publicly available on its website and at the site office; and (b) update these results on a regular basis. 	<p>Noted – documents are publicly available on the PF Formation website.</p>	Compliant	
MANAGEMENT PLAN REQUIREMENTS				
S5 C12	<p>Management plans required under this consent must be prepared in accordance with relevant guidelines, and include:</p> <ul style="list-style-type: none"> (a) a summary of relevant background or baseline data; (b) details of: <ul style="list-style-type: none"> (i) the relevant statutory requirements (including any relevant approval, licence or lease conditions); (ii) any relevant limits or performance measures and criteria; and (iii) the specific performance indicators that are proposed to be used to judge the performance of, or guide the implementation of, the development or any management measures; (c) any relevant commitments or recommendations identified in the document/s listed in condition 2 of Schedule 2; (d) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures and criteria; (e) a program to monitor and report on the: <ul style="list-style-type: none"> (i) impacts and environmental performance of the development; and 	<p>Noted – management plans updated in 2022</p> <p>With the exception of the WMP referred to in S4 C16, and the TMP in S3 C31A.</p>	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<ul style="list-style-type: none"> (ii) effectiveness of the management measures set out pursuant to condition 12(c) of Schedule 5; (f) 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; (g) a program to investigate and implement ways to improve the environmental performance of the development over time (h) a protocol for managing and reporting any: <ul style="list-style-type: none"> (i) incident, non-compliance or exceedance of the impact assessment criteria or performance criteria; (ii) complaint; or (iii) failure to comply with statutory requirements; (i) (public sources of information and data to assist stakeholders in understanding environmental impacts of the development; and (j) a protocol for periodic review of the plan. <p>Note: The Planning Secretary may waive some of these requirements if they are unnecessary or unwarranted for particular management plans.</p>			
S5 C13	The Applicant must ensure that management plans prepared for the development are consistent with the conditions of this consent and any EPL issued for the site.	Noted – management plans updated in 2022 With the exception of the WMP referred to in S4 C16, and the TMP in S3 C31A.	Compliant	
REVISION OF STRATEGIES, PLANS AND PROGRAMS				
S5 C14	<p>Within three months of:</p> <ul style="list-style-type: none"> (a) the submission of an incident report under condition 3 of Schedule 5; (b) the submission of an Annual Review under condition 5 of Schedule 5; (c) the submission of an Independent Environmental Audit under condition 6 of Schedule 5; or (d) the approval of any modification of the conditions of this consent <p>the suitability of existing strategies, plans and programs required under this consent must be reviewed by the Applicant.</p>	Noted – management plans updated in 2022 Noting the WMP referred to in S4 C16, and the TMP in S3 C31A are currently being updated prior to submission.	Compliant	

Cond No.	Condition	Comments & Evidence	Audit Findings	Recommendations
	<p>If necessary, to either improve the environmental performance of the development, cater for a modification or comply with a direction, the strategies, plans and programs required under this consent must be revised, to the satisfaction of the Planning Secretary and submitted to the Planning Secretary for approval within six weeks of the review.</p> <p>Note: This is to ensure strategies, plans and programs are updated on a regular basis and to incorporate any recommended measures to improve the environmental performance of the development.</p>	Noted	Compliant	



Appendix D Site Inspection Photographs



Plate 1 View of operations from far western boundary

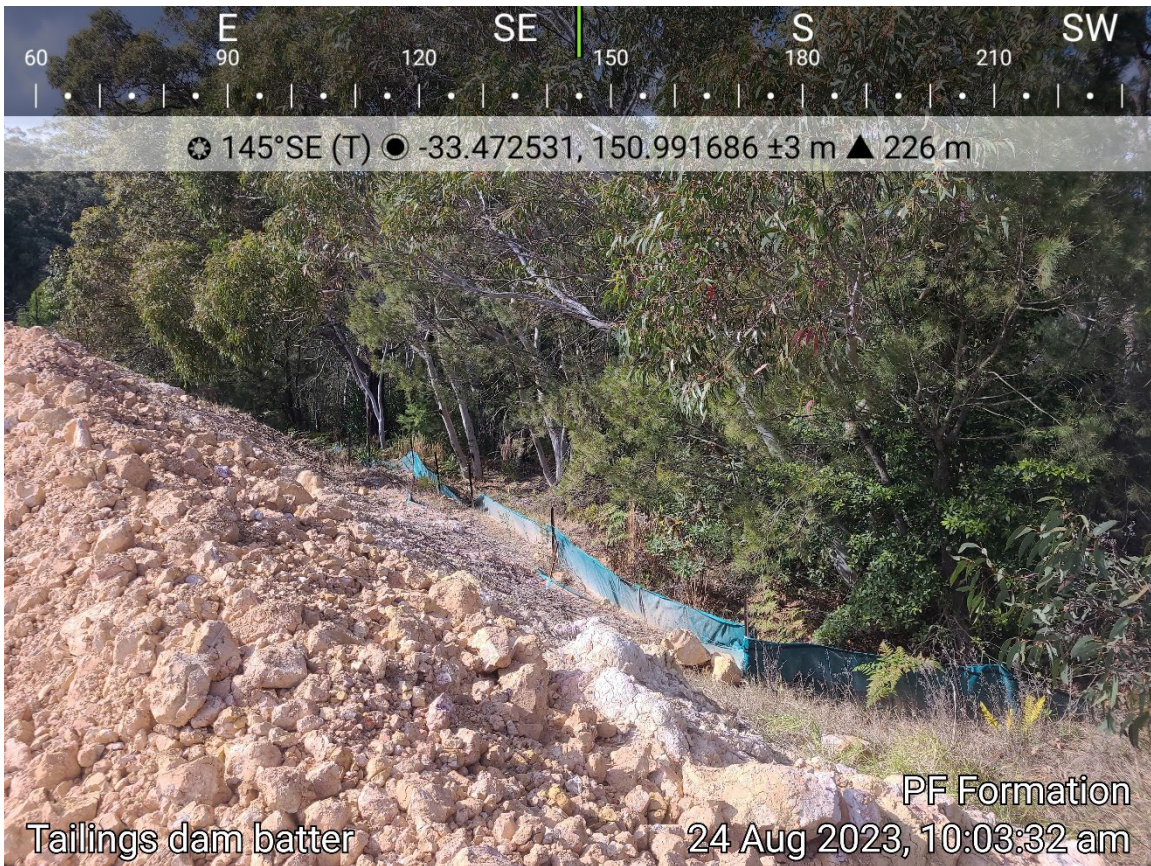


Plate 2 Top of tailings dam looking south-east

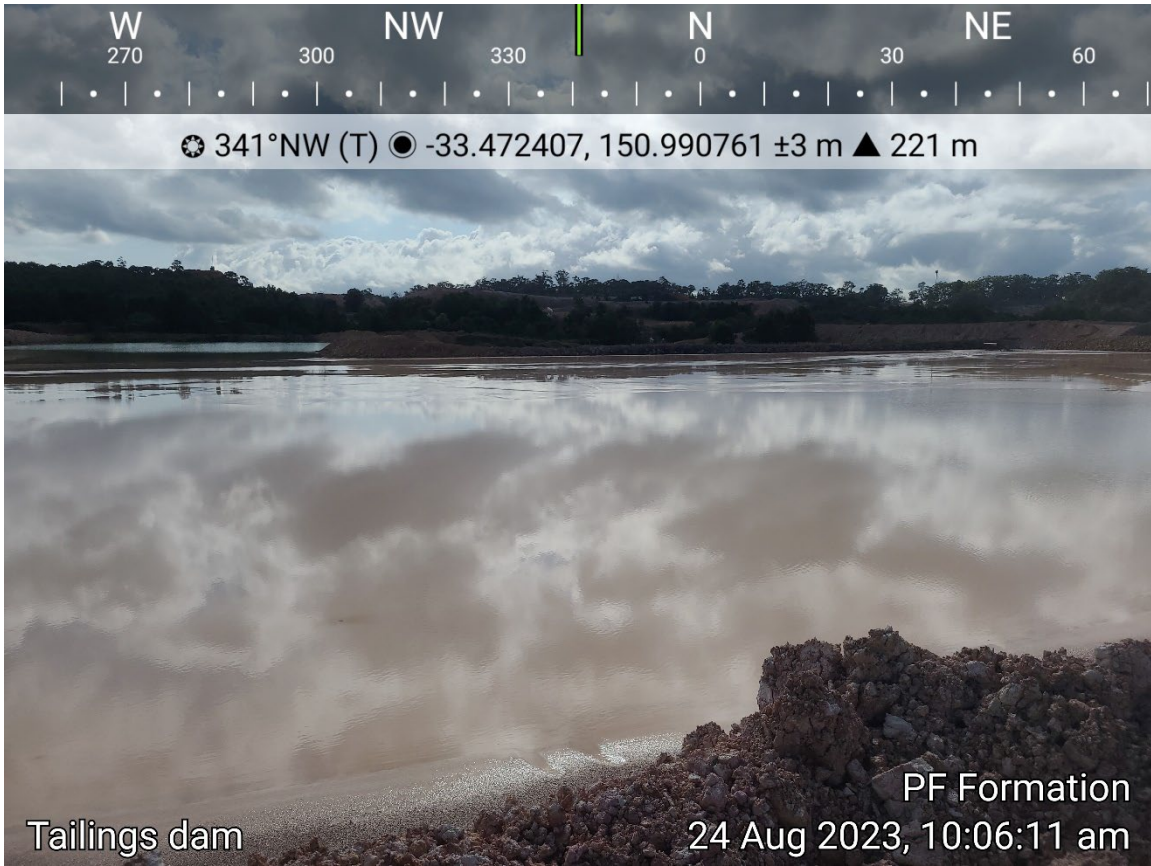


Plate 3 Top of tailings dam



Plate 4 Rehabilitation / offset area



Plate 5 Diesel fill point for mobile plant and equipment

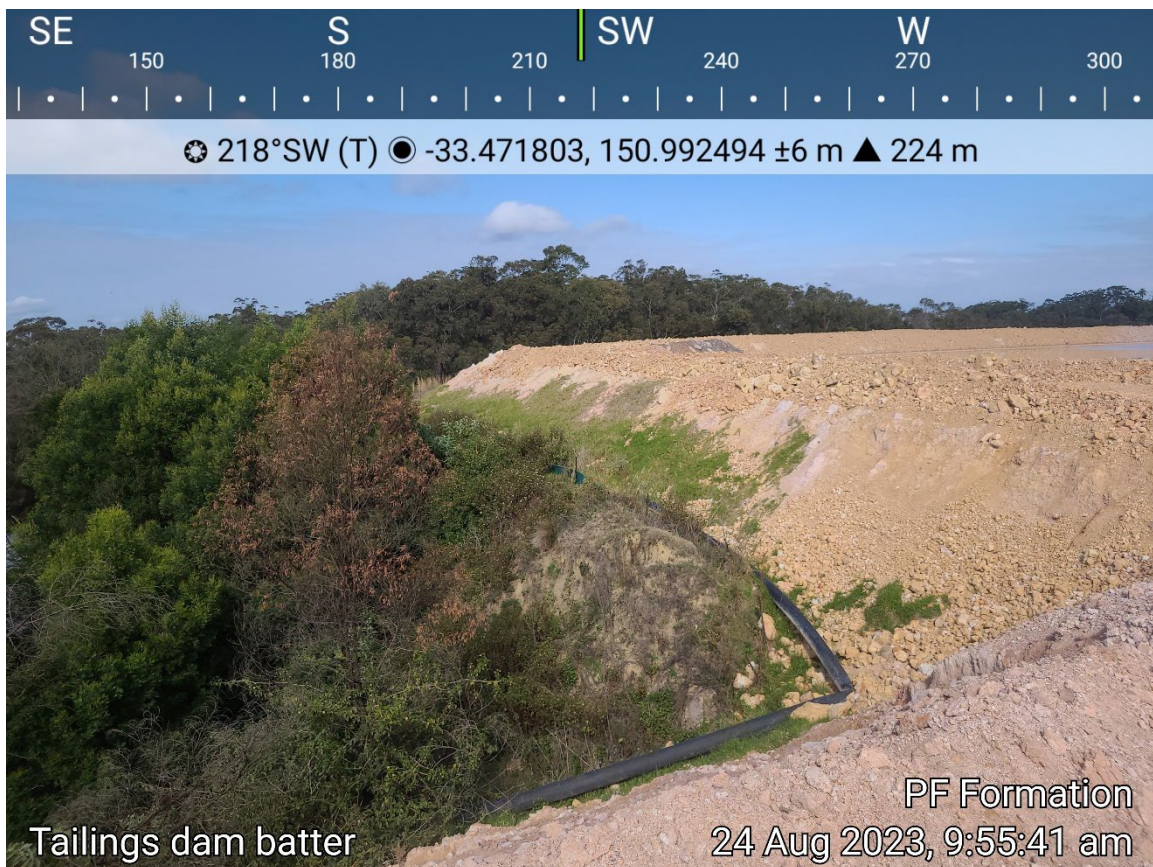


Plate 6 Batter and sediment fencing on boundary of tailings dam



Plate 7 Tailings dam and silt inlet pipe



Plate 8 Bunding at end of Hitchcock Road

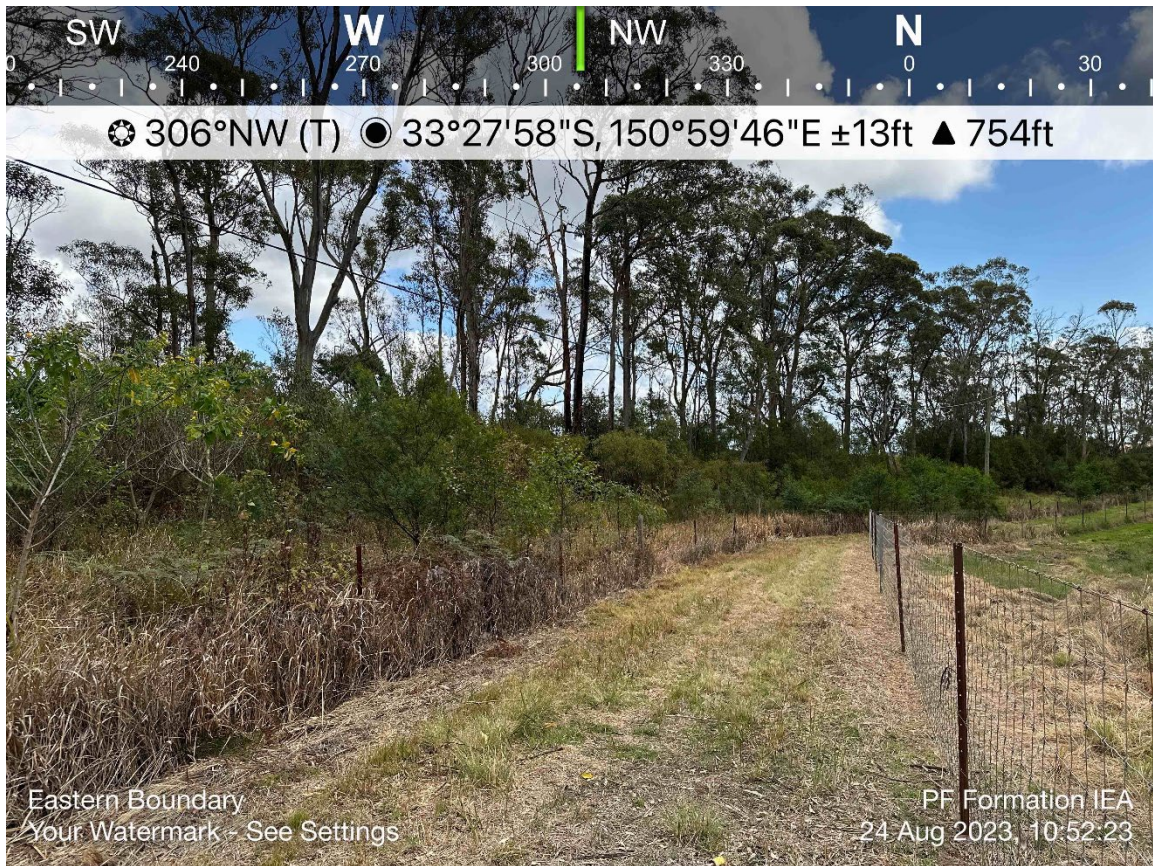


Plate 9 Far Eastern boundary just outside Extraction area



Plate 10 Extraction boundary signage surrounding perimeter of extraction area



Plate 11 DDG 3 – Jurds Paddock



Plate 12 DDG 2 – Hitchcock Road



Plate 13 DDG 4 – Maroota School



Plate 14 Groundwater Monitoring Well 20



Plate 15 Groundwater Monitoring Well 2S