

6 December 2023

Kiersten Fishburn
Secretary
Department of Planning and Environment
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Parramatta, NSW 2124



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Via Major Projects portal

**Hanson Construction Materials Pty Ltd (Hanson) – Independent Environmental Audit
2023 Report [Action Plan]**

Bass Point Quarry, MP08_0143

Dear Kiersten,

This Action Plan is to accompany the Independent Environmental Audit (IEA) 2023 Report prepared by Integrated Environmental Management Australia (IEMA), dated 01 December 2023.

This Action Plan has been prepared to fulfil the requirements of *Schedule 5, Condition 10* of MP08_0143:

10. Within 3 months of commissioning this audit, or as otherwise agreed by the Secretary, the Proponent must submit a copy of the audit report to the Secretary, together with its response to any recommendations contained in the audit report.

This Action Plan has been prepared in accordance the Department's *Independent Audit – Post Approval Requirements*.

Please do not hesitate to contact me if you would like to discuss the Action Plan and Hanson's responses to the findings of the IEA Report.

HANSON CONSTRUCTION MATERIALS PTY LTD

A handwritten signature in black ink, appearing to read "CFL", written over a light blue horizontal line.

Chelsea Flood
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No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
NC – 001	Schedule 2, Condition 8 of MP08_0143	The Proponent must limit the dispatch of trucks carrying quarry products or concrete from the site to the levels shown in Table 1 of MP08_0143.	<p>Non-compliant <i>“On the 30/07/2022 the following: 5-6am - 25 laden trucks were dispatched. Prevailing hourly limit at this time is 23 6-7am - 26 laden trucks were dispatched. Prevailing hourly limit at this time is 23</i></p> <p><i>Hanson has since incorporated an electronic system to assist in the dispatch of trucks to ensure future compliance. This system counts all trucks out.”</i></p>	No further recommendations required.	No further action is required.	N/A
NC – 002	Schedule 3, Condition 6 of MP08_0143	<p>The Proponent must prepare a Noise Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by 31 May 2014;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> • best management practice is being employed to minimise the construction, operational and transport noise of the project; • the noise impacts of the project are minimised during any meteorological conditions when the noise limits in this approval do not apply; and compliance with the relevant conditions of this approval; <p>(c) describe the proposed noise management system in detail; and</p> <p>(d) include a monitoring program that:</p> <ul style="list-style-type: none"> • is capable of regularly evaluating the performance of the project, including 	<p>Non-compliant <i>“During the Q3/Q4 2020 noise monitoring the overall levels of ambient noise (i.e., LAmax, LA1, LA10, LA50, LA90, LA99, LAmin) were not reported on.</i></p> <p><i>This Management Plan is being updated to remove these ambient parameters, however not yet approved.”</i></p>	No further recommendations required.	<p>The ambient noise parameters (LAmax, LA1, LA10, LA50, LA90, LA99, LAmin) were monitored from Q1 2021 through to Q3 2023.</p> <p>Hanson prepared a revised Noise and Blast Management Plan (dated September 2022) that removed the requirement to monitor the ambient noise parameters (LAmax, LA1, LA10, LA50, LA90, LA99, LAmin). The revised management plan was approved by DPE on 21/09/2023.</p> <p>No further action is required.</p>	N/A

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		<p>noisy individual items of plant, such as haulage trucks, crushers, and bulldozers;</p> <ul style="list-style-type: none"> • includes a protocol for determining any exceedances of the relevant conditions in this approval at locations listed in Table 2; and • evaluates and reports on the effectiveness of the noise management system on site. 				
NC – 003	<p>Schedule 3, Condition 7 of MP08_0143</p> <p>L3.2 of EPL-2193</p>	<p>The Proponent must ensure that blasting on the site does not cause exceedances of the criteria in Table 3 of MP08_0143.</p> <p>The Airblast overpressure level from blasting operations at the premises must not exceed:</p> <p>a) 115 dB (Lin Peak) for more than 5% of the total number of blasts during each reporting period; and</p> <p>b) 120 dB (Lin Peak) at any time.</p> <p>At "Monitoring Point A - Blast Monitor" or "Monitoring Point B - Blast Monitor" as labelled on the aerial photo titled 'BASS POINT QUARRY Monitoring Location - EPA' dated 11 June 2020.</p>	<p>Non-compliant</p> <p><i>“Airblast overpressure result of 120.8 dBL was recorded at Monitoring Point B on 06 July 2022. This was equivalent to 2% of the total number of blasts over the reporting period, which is greater than the allowable exceedance criterion of 0%.”</i></p>	<p>Ensure that all staff and contractors are appropriately trained and understand the blast designs to minimise reoccurrence.</p>	<p>Since the incident, there have been changes to the site management structure and contractor workforce. The current blast supervisor and contractors will complete a training package on the incident and learnings from the incident, including site-specific blast design parameters.</p>	31/01/2024
NC – 004	<p>Schedule 3, Condition 13 of MP08_0143</p>	<p>The Proponent must prepare a Blast Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA, and be submitted to the Secretary for approval by 31 May 2014;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> •best management practice is being employed; and •compliance with the relevant conditions of this approval; <p>(c) include a specific blast fume management protocol to demonstrate how emissions will be minimised,</p>	<p>Non-compliant</p> <p><i>“Based on site communications, the overpressure blast in 2022 (non-compliance above) was due to poor blast design. This failure of blast design is a non-compliance in the implementation of the Management Plan.”</i></p>	<p>Ensure that all staff and contractors are appropriately trained and understand the blast designs to minimise reoccurrence.</p>	<p>Since the incident, there have been changes to the site management structure and contractor workforce. The current blast supervisor and contractors will complete a training package on the incident and learnings from the incident, including site-specific blast design parameters.</p>	31/01/2024

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		<p>including risk management strategies if blast fumes are generated; and (d) include a monitoring program for evaluating the performance of the project including:</p> <ul style="list-style-type: none"> •compliance with the applicable criteria; and •minimising fume emissions from the site. <p>The Proponent must implement the approved management plan as approved from time to time by the Secretary.</p>				
NC – 005	Schedule 3, Condition 14 of MP08_0143	The Proponent must ensure that all reasonable and feasible avoidance and mitigation measures are employed so that particulate matter emissions generated by the project do not exceed the criteria in Tables 4 to 6 of MP08_0143 at any residence on privately-owned land.	<p>Non-compliant <i>“There were eight instances where the 24 hour average PM10 recorded at monitoring point PM10-2 was greater than the 50 µg/m³.”</i></p> <p><i>“2021 - The annual average PM10 result was 36 µg/m³; above the annual average criterion of 30 µg/m³”</i></p>	Hanson to look into real time operating systems to help monitor and adjust quarry operation. Hanson to also get real time alarms operational again	<p>The Air Quality Management Plan will be reviewed by an external air quality professional, to identify areas for improvement. The type of equipment being used to monitor PM₁₀ will be included in the scope of review.</p> <p>Real-time alarms from the site E-BAM (PM10-1) have resumed since the IEA.</p>	30/06/2024
NC – 006	Schedule 3, Condition 16 of MP08_0143	<p>The Proponent must prepare an Air Quality Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared in consultation with the EPA, and submitted to the Secretary for approval by 31 May 2014;</p> <p>(b) describe the measures that would be implemented to ensure:</p> <ul style="list-style-type: none"> • best management practice is employed; • the air quality impacts of the project are minimised during adverse meteorological conditions and extraordinary events; and 	<p>Non-compliant <i>“Implementation of the Air Quality Management Plan.</i></p> <p><i>Self-reported in 2021 Annual Review - the Low Volume Air Sampler (LVAS) was not available for sampling from 16 February 2020 to 18 April 2020 due to maintenance. A backup LVAS unit was available but malfunctioned, such that there were no LVAS units available to undertake monitoring in accordance with the Air Quality Management Plan. It is understood that failure was due to power supply.</i></p>	No further recommendations required.	The Air Quality Management Plan will be reviewed by an external air quality professional, to identify areas for improvement. The type of equipment being used to monitor PM ₁₀ will be included in the scope of review.	30/06/2024

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
		<ul style="list-style-type: none"> • compliance with the relevant conditions of this approval; (c) describe the proposed air quality management system based on the preparation of a site-specific best management practice determination and reactive dust management strategy; and (d) include an air quality monitoring program that: <ul style="list-style-type: none"> • is capable of evaluating the performance of the project; • includes a protocol for determining any exceedances of the relevant conditions of approval; • adequately supports the air quality management system; and • evaluates and reports on the adequacy of the air quality management system. <p>The Proponent must implement the approved management plan as approved from time to time by the Secretary.</p>	<p><i>Hanson has switched LVAS to solar to help reduce battery failures, which appears to have reduced outages occurring."</i></p>			
NC – 007	<p>Schedule 3, Condition 19 of MP08_0143</p> <p>L1.1 of EPL-2193</p>	<p>Unless an EPL or the EPA authorises otherwise, the Proponent must ensure that all surface water discharges from the site comply with section 120 of the POEO Act.</p> <p>Except as may be expressly provided in any other condition of this licence, the licensee must comply with section 120 of the Protection of the Environment Operations Act 1997.</p>	<p>Non-compliant</p> <p><i>"In a letter [EPA Formal Warning Letter] dated 09/08/2022: On 27 May 2022, the Licensee self-reported a discharge of sediment laden water from a non-licensed discharge point on the north eastern side of the premises. The EPA is of the opinion that HANSON CONSTRUCTION MATERIALS PTY LTD has breached licence condition L1 – Pollution of waters."</i></p>	<p>Hanson should ensure that adequate provisions are made to ensure all water is contained onsite and to minimise reoccurrence.</p>	<p>Since the IEA, Hanson have improved surface water management measures to the north-east of the site. A silt fence and straw bales have been installed to control sediment and surface water runoff.</p> <p>Sediment basins are to be designed and installed to further improve surface water management in the area, in line with the auditors' improvement recommendation IR – 001.</p>	30/06/2024

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
NC – 008	Schedule 3, Condition 22 of MP08_0143	<p>The Proponent must ensure that all chemicals and/or petroleum products on site are held in appropriately bunded areas with impervious flooring and sufficient capacity to contain 110% of the largest container stored within the bund, and in accordance with Australian Standard AS1940-2004, The Storage and Handling of Flammable and Combustible Liquids. The flooring and bund(s) must be designed in accordance with:</p> <ul style="list-style-type: none"> • the requirements of relevant Australian Standards; and • DECC's Storing and Handling Liquids: Environmental Protection – Participants Manual. 	<p>Non-compliant <i>“Site inspections highlighted multiple products in IBC’s which were not stored correctly or removed from site. Of note was the storage of hydrochloric acid, which was not stored in bunded area in graveyard area.”</i></p>	Remove unwanted items in graveyard area/and all containers/ IBC’s stored in appropriate bunded areas. Ensure all items are correctly disposed of in licenced facilities.	Since the IEA, Hanson have commenced the tender process for clean-up of the entire graveyard area, including disposal of waste items to licenced facilities. The tender process has nearly been completed. Upon selection and onboarding of the preferred vendor, clean-up works will commence.	30/06/2024
	O1.1 of EPL-2193	<p>Licensed activities must be carried out in a competent manner. This includes:</p> <p>a) the processing, handling, movement and storage of materials and substances used to carry out the activity; and</p> <p>b) the treatment, storage, processing, reprocessing, transport, and disposal of waste generated by the activity.</p>	<p>Non-compliant <i>“Improper storage of hydrocarbons witnessed during site inspections.”</i></p>			
NC – 009	Schedule 3, Condition 24(a) of MP08_0143	<p>Site Water Balance that:</p> <ul style="list-style-type: none"> • includes details of: <ul style="list-style-type: none"> ○ sources and security of water supply, including contingency planning; ○ water use on site; ○ water management on site, including groundwater inflows to the quarry voids and ○ site discharges; and ○ audit and reporting procedures, including comparisons of the site water balance ○ each calendar year; and 	<p>Non-compliant <i>“Throughout the audit period, Hanson failed to undertake an annual audit of the Site Water Balance as required by this condition.</i> <i>2020 - Site Water Balance requires an annual audit of the sites Water Balance to be undertaken.</i> <i>2021 - Site Water Balance requires an annual audit of the sites Water Balance to be undertaken.</i> <i>2022 - Site Water Balance requires an annual audit of the sites Water Balance to be undertaken.”</i></p>	Hanson to update the Site Water Balance which is to include the audit and reporting procedures, including comparisons of the site water balance each calendar year.	<p>The Site Water Balance will be reviewed by a suitably qualified and experienced person.</p> <p>Since the IEA, additional water meters have been installed on site, which will facilitate the annual water balance calculations.</p>	01/12/2024

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
	Statement of Commitments of MP08_0143	<p>o describes the measures that would be implemented to minimise clean water use on site and maximise recycling opportunities;</p> <p>A detailed site Water Management Plan will be prepared for the Project. This plan must be prepared in consultation with NSW Office of Water and NSW EPA to the satisfaction of the Director General of the Department of Planning and Infrastructure.</p> <p>The plan must include:</p> <p>...</p> <p>b. The maintenance of a water balance model covering the site and Killalea Lagoon, this balance is to be annually assessed. The model must take account of water inflows and discharges from the site and is to allow for the informed assessment of environmental monitoring data. The water balance must document the following:</p> <ul style="list-style-type: none"> • Rainfall inputs to quarry voids and Killalea Lagoon. • Estimated evaporative losses from quarry voids and Killalea. • Uses of water within the quarry operation. • Discharge from quarry void to licensed outlet and transfers between voids. • All other inflows and outflows from the quarry. • Estimates of groundwater inflows to quarry void based on balance of other inflow, outflows, and losses... 	<p>Non-compliant <i>"For condition (b)</i></p> <p><i>Hanson has failed to undertake yearly updates of the Water Balance Report as self-reported in the 2020-2022 Annual Reviews."</i></p>			

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
NC – 010	Schedule 3, Condition 24(b) of MP08_0143	<p>Surface Water Management Plan, that includes:</p> <ul style="list-style-type: none"> • a detailed description of the surface water management system on site, including the: <ul style="list-style-type: none"> ○ clean water diversion systems; ○ erosion and sediment controls; ○ effluent irrigation system; ○ water transfers from the Extraction Areas; ○ water storages; and ○ discharge points; • design objectives and performance criteria for proposed: <ul style="list-style-type: none"> ○ erosion and sediment control structures; ○ water storages, including quarry voids; ○ site discharges; and ○ control of water pollution from rehabilitated areas of the site; • performance criteria, including trigger levels for investigating any potentially adverse impacts for surface water quality in Killalea Lagoon and Bushrangers Bay; • a program to monitor: <ul style="list-style-type: none"> ○ the effectiveness of the water management system; ○ site discharge water quality; and ○ surface water level and quality in Killalea Lagoon, including the quantification of ○ rainfall inflow, groundwater inflow and evaporation; • a plan to respond to any exceedances of the performance criteria, and mitigate and/or offset any adverse surface water impacts of the project; 	<p>Non-compliant <i>“There were 15 non-compliances associated with surface water discharge in 2022.</i></p> <p><i>Additionally, there are 2 non-compliances associated with surface water discharge in 2023</i></p> <p><i>On the 27/05/2022 Hanson had an unlicensed discharge off site with TSS 481 recorded, this was reported to the EPL, and a formal warning was given for the pollution of waters. (see NC – 008)”</i></p>	<p>Continue to look into ways to lower TSS. Liaise with planning and EPA if chemical flocculation is to be used.</p>	<p>Surface water management is a key focus area for the site. In the short term, the site is looking to avoid offsite surface water discharges (unless sediment basin capacity needs to be reinstated, due to storm events).</p> <p>Hanson have noted the recommendation to liaise with DPE and EPA if chemical flocculation is to be used.</p>	Ongoing

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
	L2.4 of EPL-2193	<ul style="list-style-type: none"> • long term water quality management objectives and the measures to achieve these objectives; and • audit and reporting procedures, including comparisons of the monitoring results Water and/or land concentration limits	<p>Non-compliant <i>“There were 15 non-compliances associated with surface water discharge in 2022. Additionally, there are 2 non-compliances associated with surface water discharge in 2023. See Schedule 3, C 24b for details of these.</i></p> <p><i>On the 27/05/2022 Hanson had an unlicensed discharge off site with TSS 481 mg/L recorded, this was reported to the EPL, and a formal warning was given for the pollution of waters.</i></p> <p><i>Further details of this event are detailed in L1.1 above.”</i></p>			
NC – 011	Schedule 3, Condition 29 of MP08_0143	The Proponent must ensure that all heavy vehicles: <ul style="list-style-type: none"> (a) do not exceed an on-site speed limit of 30 km per hour; (b) do not exceed a speed limit of 50 km per hour on Bass Point Quarry Road; (c) are dispatched from the site in a controlled manner to minimise queuing and potential delays at the roundabout and Dunmore Road intersections; (d) have their loads covered when entering or leaving the site, and (e) ensure that all laden trucks are cleaned of material that may fall from them, before leaving the site. 	<p>Non-compliant <i>“On condition (d)</i></p> <p><i>2021 Annual Review - Between 03/02/2021 to 19/03/2021, 275 road trucks carrying quarry materials were dispatched from site without appropriate tarps/covers. It should be noted however, that these trucks were dispatched with armour rocks material i.e., rocks over 1m in diameter, not small aggregate, or road base.</i></p> <p><i>It should be noted that there were no complaints received for this incidence,</i></p>	No further recommendations.	No further action is required.	N/A

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			<i>and the failure to cover loads was discovered by Hanson staff."</i>			
NC – 012	Schedule 3, Condition 33 of MP08_0143	<p>The Proponent must prepare a Transport Management Plan for the project to the satisfaction of the Secretary. This plan must:</p> <p>(a) be prepared by suitably qualified experienced person(s), whose appointment has been approved by the Secretary;</p> <p>(b) be prepared in consultation with Council and RMS, and be submitted to the Secretary within three months of the determination of Modification 2, or as otherwise agreed by the Secretary;</p> <p>(c) include details of all transport routes and traffic types to be used for project-related traffic;</p> <p>(d) describe the processes in place for the control of truck movements entering and exiting the site;</p> <p>(e) 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;</p> <p>(f) include a Driver's Code of Conduct that includes procedures to ensure that drivers:</p> <p>(i) adhere to posted speed limits or other required travelling speeds;</p> <p>(ii) adhere to designated transport routes;</p> <p>(iii) implement safe and quiet driving practices;</p> <p>(iv) are aware of potential safety issues along the haulage route, particularly near schools and intersections;</p>	<p>Non-compliant</p> <p><i>"No evidence of endorsement provided in Management Plan."</i></p> <p><i>"On the implementation of the Traffic Management Plan:</i></p> <ul style="list-style-type: none"> <i>• Between 03/02/2021 to 19/03/2021 275 road trucks carrying quarry materials were dispatched from site without appropriate tarps/covers (self-reported)</i> <i>• Additionally, on 30/07/2022 between 5-6am - 25 laden trucks were dispatched. Prevailing hourly limit at this time is 23.</i> <i>Between 6-7am - 26 laden trucks were dispatched. Prevailing hourly limit at this time is 23."</i> 	Add letter of appointment (a) to management plan. No further recommendations for the non-compliance.	<p>A revised Transport Management Plan was under assessment by DPE at the time of the IEA. Following discussion with DPE, that TMP was updated. Discussion with DPE included justification of suitability of person(s) who completed the review.</p> <p>A revised TMP (dated October 2023) was approved by DPE on 23/10/2023. No further action is required.</p>	N/A

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		<p>(g) describe the measures to be put in place to ensure compliance with the Driver's Code of Conduct; and</p> <p>(h) propose measures to minimise the transmission of dust and tracking of material onto the surface of public roads from vehicles exiting the site.</p> <p>The Proponent must implement the Transport Management Plan as approved by the Secretary.</p>				
NC – 013	<p>Schedule 5, Condition 1 of MP08_0143</p> <p>Schedule 5, Condition 7A of MP08_0143</p>	<p>The Proponent must prepare an Environmental Management Strategy for the project to the satisfaction of the Secretary. This strategy must:</p> <p>(a) be submitted to the Secretary for approval by 31 July 2014;</p> <p>(b) provide the strategic framework for environmental management of the project;</p> <p>(c) identify the statutory approvals that apply to the project;</p> <p>(d) describe the role, responsibility, authority, and accountability of all key personnel involved in the environmental management of the project;</p> <p>(e) 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 operation and environmental performance of the project; • receive, handle, respond to, and record complaints; • resolve any disputes that may arise during the course of the project; • respond to any non-compliance; and • respond to emergencies; and <p>(f) include:</p>	<p>Non-compliant</p> <p><i>"Non-Compliant on the Implementation for the following: Section 4.5.2 Non-Compliance incident states:</i></p> <p><i>"Within 7 days of the date of the non-compliance incident, Hanson will provide a detailed report to DPIE and the EPA (as deemed relevant)"</i></p> <p><i>This example below was outside the seven days for report notifications - resulting in non-compliance.</i></p> <ul style="list-style-type: none"> • <i>Detailed Incident Investigation Report regarding discharge of polluted water (excess pH) via LDP1 was provided to Planning on 14/09/2022, with Hanson advising the Secretary of the incident on 31/08/2022. The incident occurred on 27/08/2022 (further details of incident detailed in Sch 3, Condition 24b). Report was provided 14 days after notifying Planning of the incident."</i> 	<p>Recommendation - Hanson to ensure all detailed incident reporting is provided to DPE within 7 days.</p>	<p>The example was an unfortunate oversight and an outlier when considered in the scope of all detailed incident reports submitted to DPE during the IEA period. Detailed incident reports will continue to be submitted to DPE within 7 days as required, or in accordance with alternate timeframes stipulated by DPE (e.g. DPE deadlines for Requests for Information often fall outside of the 7 day period).</p>	Ongoing

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		<ul style="list-style-type: none"> • copies of any strategies, plans and programs approved under the conditions of this approval; and • a clear plan depicting all the monitoring required to be carried out under the conditions of this approval. <p>The Proponent must implement the approved strategy as approved from time to time by the Secretary.</p>				
NC – 014	Schedule 5, Condition 4 of MP08_0143	<p>By the end of March each year, the Proponent must review the environmental performance of the project to the satisfaction of the Secretary. This review must:</p> <p>(a) describe the development (including rehabilitation) that was carried out in the previous calendar year, and the development that is proposed to be carried out over the current calendar year;</p> <p>(b) include a comprehensive review of the monitoring results and complaints records of the project over the previous calendar year, which includes a comparison of these results against:</p> <ul style="list-style-type: none"> • the relevant statutory requirements, limits, or performance measures/criteria; • the monitoring results of previous years; and • the relevant predictions in the EA; <p>(c) identify any non-compliance over the last year, and describe what actions were (or are being) taken to ensure compliance;</p> <p>(d) identify any trends in the monitoring data over the life of the project;</p> <p>(e) identify any discrepancies between the predicted and actual impacts of the</p>	<p>Non-compliant <i>“2021 Annual review was issued on 28/07/2022 and was approved by DPE on the 19/08/2022. Final draft version was completed by 31/03/2022. As the consent requires the Annual Review to be submitted by the end of March, the submission in August deems this a non-compliance.”</i></p>	<p>Hanson to ensure that all Annual Reviews are submitted to the Secretary by the end of March each year.</p>	<p>Late submission of the 2021 Annual Review was an unfortunate oversight. All future Annual Reviews will be submitted to the Secretary by the end of March each year.</p>	Ongoing

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		project, and analyse the potential cause of any significant discrepancies; and (f) describe what measures will be implemented over the current calendar year to improve the environmental performance of the project				
NC – 015	M2.2 of EPL-2193	Water and/or land monitoring requirements	<p>Non-compliant <i>“On the 04/07/2022 a discharge event from LDP 1 was not collected, as Hanson deemed this too dangerous for collection as detailed in the EPL monitoring report. IEMA agrees that not sampling due to dangerous conditions is an appropriate and valid response. However, as Hanson did not notify the EPA of this missed sample, the audit team has found BPQ non-compliant for water monitoring requirements for that date. This was reported in the 2022-2023 Annual Return; however, Hanson did not notify the EPA at the time that sampling was not conducted due to dangerous conditions. Both MP 08_0143 and EPA 2193 have a timeframe for reporting an incident or exceedance as 7 days. Had Hanson reported the missed sample, this condition would have been compliant.”</i></p>	All missed samples should be notified to the EPA within 7 days as per Condition R2.2. While this missed sample may not have caused environmental harm, this timeframe is a used for reporting incidents or exceedances.	The missed sample on 04/07/2022 was an outlier and is not reflective of surface water discharge sampling practices on site, which are ordinarily in compliance with stipulated sampling requirements. Any future missed surface water discharge samples, though unlikely and infrequent, will be notified to the relevant regulatory authorities within 7 days of occurrence.	Ongoing
IR – 001	Schedule 3, Condition 24(b) of MP08_0143	N/A (improvement recommendation)	<p>Opportunity for improvement See above NC – 010.</p>	Improvement of Erosion and Sediment (Figure 2*) control of the eastern side of BPQ to include: <ul style="list-style-type: none"> • Construction of a Sediment Dam; • Connect Sediment Dam to drain for discharge; 	See response above to NC – 007 and NC – 010.	30/06/2024

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				<ul style="list-style-type: none"> • Temporary sediment fence along northern fence line; and • Coir logs or similar along steep exposed banks to slow water flow until vegetation becomes established. • Compliant with 'Blue Book' 		
IR – 002	Schedule 3, Condition 16 of MP08_0143	N/A (improvement recommendation)	<p>Opportunity for improvement <i>"Site received meteorological data from Automatic Weather Station (AWS) at Kiama. AWS is approximately 5.5km from site. This location has been approved in the AQMP."</i></p>	Hanson to look into AWS/real time air review to assist with quarry operations.	See responses above to NC – 005 and NC – 006.	30/06/2024
IR – 003	Schedule 3, Condition 38 of MP08_0143	N/A (improvement recommendation)	<p>Opportunity for improvement <i>"Hanson has carried out rehabilitation along the northern and southern screening bund using native plants from Jamberoo Native Nursery. Verified during site inspections.</i></p> <ul style="list-style-type: none"> • Note: this condition is primarily aimed at final rehabilitation. Site is still in operation, however there is a good coverage of vegetation along bunds that is safe/stable and non-polluting. • Large amount of exotic grass present on site Bitou Bush and Lantana present across site also." 	Future rehabilitation to include mix of native grass based on advice of seed specialist/coastal specialist.	Going forward, Hanson will utilise native seed mixes, selected based on specialist advice, to assist with rehabilitation.	Ongoing
IR – 004	Schedule 3, Condition 40 of MP08_0143	N/A (improvement recommendation)	<p>Opportunity for improvement <i>"Hanson have provided multiple monitoring programs/reports and invoices which detail successful implementation of the Landscape Management Plan.</i></p>	Continued targeted weed management - especially around lantana and bitou bush.	Hanson will continue targeted weed control activities in collaboration with the regional biosecurity body and weed control contractor	30/06/2024

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
			<p><i>•Note - Hanson self-reported a non-compliance in the 2020 Annual Review: "Failing to undertake weed management in accordance with the Landscape Management Plan. Weed management by contractor was unable to be completed due to COVID restrictions in the Shell Harbour area".</i></p> <p><i>• Skills shortage and travel restrictions during the Covid-19 pandemic prevented weed management to occur. Based on site inspections, Hanson has undertaken sufficient weed management during audit period, and the self-reported non-compliance was not due to an action caused by Hanson, as has therefore been deemed compliant by the audit team.</i></p> <p><i>• Illawarra Shoalhaven Joint Organisation (ISJO) currently undertake weed control management for site monthly.</i></p> <p><i>• Site inspections revealed that lantana, bitou bush and kikuyu grass was the most common weeds on site.</i></p> <p><i>• No current banks of topsoil management on site.</i></p> <p><i>• Feral animals - site looking in additional feral animal management to control fox's/deer on site.</i></p> <p><i>Hanson have provided evidence that this Management Plan will be updated on the approval of MOD 3."</i></p>	<p>Incorporate a weed report from ISJO (or other contractors) highlighting spraying area/operations/general weed management each month.</p>	<p>(Illawarra Shoalhaven Joint Organisation; ISJO).</p> <p>Hanson will work with the weed control contractor to establish a more rigorous process for documenting activities completed.</p>	
IR – 005	Schedule 5, Condition 4 of MP08_1043	N/A (improvement recommendation)	<p>Opportunity for improvement See above NC – 014.</p>	<p>Include predictions against the EA in annual reviews</p>	<p>Future Annual Reviews will include comparison against the EA.</p>	<p>Ongoing</p>

No.	Condition	Compliance Requirement	Independent Audit Finding	Independent Audit Recommendation	Proponent's Response	Proposed Action Due Date
IR – 006	Schedule 3, Condition 22 of MP08_0143	N/A (improvement recommendation)	<i>Opportunity for improvement</i> See above NC – 008.	Hanson to remove all unwanted/redundant items in the graveyard area. Ensure all items are correctly disposed of in licenced facilities	See response above to NC – 008.	30/06/2024