

Response to recommendations – Non-compliances (Project Approval 07_0155)

NC#	Condition ID	Audit Recommendation	Multiquip Response
NC1	Schedule 2 Condition 10	Resolve disputes with Council relating to financial liability for road repairs and ensure required contributions are made to Council.	Discussions with Council are active and ongoing regarding the financial liability. Regular updates will continue to be provided to the Department.
NC2	Schedule 2 Condition 13	Resolve disputes with Council to enable finalisation and execution of VPA.	Discussions with Council are active and ongoing regarding the VPA. Regular updates will continue to be provided to the Department.
NC3	Schedule 3 Condition 1A	Ensure boundaries of the approved areas of extraction are more clearly marked in a manner that allows them to be easily identified.	The boundary on site will be clearly re-marked with stakes/ bunting.
NC4	Schedule 3 Condition 4	Continue to implement proposed improvements detailed in Multiquip's response to the Show Cause Notice submitted to the Department on 11 December 2024 to ensure operations, including product loading and dispatch of trucks, only occurs during the permissible hours specified in Table 3: Operating Hours. Noting that at the time of this IEA, the hours for product loading and dispatch should still adhere to those approved under Project Approval MOD2.	Implementation of the proposed improvements is underway and continuing.
NC5	Schedule 3 Condition 27	Continue to implement proposed improvements detailed in Multiquip's response to the Show Cause Notice submitted to the Department on 11 December 2024 to ensure truck movements do not exceed the limits in condition 27.	Implementation of the proposed improvements is underway and continuing.
NC6	Schedule 3 Condition 29	No recommendation is made in relation to this non-compliance as the issue has been rectified.	No action required – issue has been rectified.
NC7	Schedule 3 Condition 34A	Complete vegetation of the eastern visual bund wall including ensuring that erosion control measures are implemented.	Vegetation of the eastern visual bund wall is to be completed, pending the contents of the revised Development Control Order (DCO) which is expected from the Department.
NC8	Schedule 3 Condition 37A	Obtain Department approval of the updated Waste Management Plan and do not import waste material until such time as the Department has approved	The Department will be followed up regarding the status of the submitted plan (submitted 27/05/2025).

		the Waste Management Plan.	Required revisions – if any – will be made to ensure that approval can be obtained. No waste material is proposed for import until the Waste Management Plan is approved.
NC9	Schedule 4 Condition 1	Implement an improved system of notifying exceedances to the Department to ensure the Department are notified within seven days of Multiquip becoming aware of the exceedance.	An improved system for notifying exceedances is to be developed as a priority.
NC10	Schedule 5 Condition 4	Implement an improved system of notifying non-compliances to the Department to ensure the Department are notified within seven days of Multiquip becoming aware of the non-compliance.	An improved system for notifying non-compliances is to be developed as a priority.
NC11	Schedule 5 Condition 8	Review and, if necessary, revise the sum of the Rehabilitation Bond within 3 months of submitting this Audit Report to the Department. Obtain approval of the Rehabilitation Bond from the Department.	The Rehabilitation Bond will be reviewed within 3 months of the date of the Audit Report (i.e. by 10 October 2025).

Response to recommendations – Non-compliances (EPL 13213)

NC#	Condition ID	Audit Recommendation	Multiquip Response
NC13	O4.1	Prioritise submission of the revised Water Management Plan (WMP), including changes to the Surface Water Monitoring Program and Groundwater Monitoring Program, to the Department for approval and then vary EPL 13213 to reference the updated WMP and associated changes to monitoring points.	An external consultant has been engaged to prepare the WMP, with an expected submission date of early September 2025.
NC14	M2.3	Prioritise submission of the revised Water Management Plan (WMP), including changes to the Surface Water Monitoring Program and Groundwater Monitoring Program, to the Department for approval and then vary EPL 13213 to reference the updated WMP and associated changes to monitoring points.	As above.
NC15	U1.2	No recommendation is made in relation to this non-compliance as the Licensed Discharge Trial has ended.	No action required – Licensed Discharge Trial has ended.
NC16	U1.5	No recommendation is made in relation to this non-compliance as the Licensed Discharge Trial has ended.	No action required – Licensed Discharge Trial has ended.

Response to recommendations – Opportunities for improvement (Project Approval 07_0155 and EPL 13213)

Condition ID	Audit Recommendation	Multiquip Response
Schedule 3 Condition 6	Obtain Department approval of the updated Noise Monitoring Program.	The Department will be followed up regarding the status of the submitted plan (submitted 21/05/2025). Required revisions – if any – will be made to ensure that approval can be obtained.
Schedule 3 Condition 7	Continue to consider implementation of dust management measures, including those detailed in Dust Management Capacity Assessment, to minimise dust emissions.	Implementation of dust management measures will continue, to ensure that dust emissions are minimised. The outcomes of the Dust Management Capacity Assessment are to be discussed with the NSW EPA during an upcoming site inspection scheduled for the end of August 2025.
Schedule 3 Condition 9	Obtain Department approval of the updated Air Quality Monitoring Program.	The Department will be followed up regarding the status of the submitted plan (submitted 21/05/2025). Required revisions – if any – will be made to ensure that approval can be obtained.
Schedule 3 Condition 13	Prioritise submission of the revised Water Management Plan to the Department for approval.	As per response to NC13.
Schedule 3 Condition 14	Prioritise submission of the revised Water Management Plan, including Site Water Balance, to the Department for approval.	As per response to NC13.
Schedule 3 Condition 16	Prioritise submission of the revised Water Management Plan, including any changes to the Surface Water Monitoring Program, to the Department for approval.	As per response to NC13.
Schedule 3 Condition 17	Prioritise submission of the revised Water Management Plan, including changes to the Groundwater Monitoring Program, to the Department for approval.	As per response to NC13.
Schedule 3 Condition 18	Prioritise submission of the revised Water Management Plan, including any changes to the Surface and Groundwater Response Plan, to the Department for approval.	As per response to NC13.
Schedule 3 Condition 20	Prioritise submission of the revised Landscape Management Plan to the Department for approval.	The Landscape Management Plan is anticipated to be completed and submitted in 2025.
Schedule 3 Condition 21	Prioritise submission of the revised Landscape Management Plan, including the Rehabilitation Management Plan, to the Department for approval.	As per response to Schedule 3 Condition 21 Opportunity for Improvement (OFI).
Schedule 3 Condition 22	Prioritise submission of the revised Landscape Management Plan, including	As per response to Schedule 3 Condition 21 OFI.

	the Quarry Closure Plan, to the Department for approval.	
Schedule 3 Condition 24	Obtain Department approval of the updated Aboriginal Heritage Management Plan.	The Department will be followed up regarding the status of the submitted plan (submitted 28/05/2025). Required revisions – if any – will be made to ensure that approval can be obtained.
Schedule 3 Condition 26	Resolve disputes with Council to enable finalisation and execution of VPA.	As per response to NC2.
Schedule 3 Condition 30	Prioritise submission of the revised Traffic Management Plan to the Department for approval.	The Traffic Management Plan is anticipated to be completed and submitted in 2025.
Schedule 3 Condition 32	Request formal approval of the VIA from the Department.	The Department will be contacted regarding the submitted VIA within three months of the completion of the audit report. Required revisions – if any – will be made to ensure that approval can be obtained.
Schedule 3 Condition 33	Following approval of the VIA from the Department, advise all owners of privately-owned residences identified in the VIA that they are entitled to additional mitigation measures to reduce the visibility of the quarry from their properties.	This action is to be carried out as required, following approval of the VIA.
Schedule 3 Condition 38	The storage of chemicals onsite could be improved to reduce the risk of leaks and/or spills from impacting the environment. This could involve completing a chemical audit to assess the presence and storage of chemicals across the site. The storage of chemicals (e.g. oils) on the eastern side of the maintenance area would benefit from being re-engineered, such as sealing and bunding, rather than relying upon the current use of bunded pallets.	The storage of chemicals onsite will be reviewed, particularly with regard to those currently stored on bunded pallets at the eastern side of the maintenance area, to determine whether improvements can be made.
Schedule 5 Condition 1	Prioritise submission of the revised EMS to the Department for approval following approval of all management plans.	This recommendation will be actioned. Once all management plans are approved by the Department, the EMS will be reviewed and revised as necessary, prior to submission.
Schedule 5 Condition 2	Prioritise submission of the revised EMP to the Department for approval following approval of all management plans.	This recommendation will be actioned. Only minor revisions are expected to be required to the EMP, and it should therefore be a quick process to finalise and submit once all management plans are approved by the Department.

Schedule 5 Condition 5A	Complete update of the strategies, plans, and programs required under this approval and submit to the Department.	This action is underway, as per various responses above. A register of all required management plans and their statuses has been prepared and is reviewed regularly.
Schedule 5 Condition 5B	Complete update of the management plans required under this approval and submit to the Department.	As per response to Schedule 5 Condition 5A OFI.
Schedule 5 Condition 6	Commence process to appoint independent auditors well enough in advance to allow for potential delays in the approval and appointment of auditors.	This recommendation is noted for future audits.
Schedule 5 Condition 9	Appoint a suitable Chairperson, plus obtain appropriate representation from other parties listed in Schedule 5 Condition 9, and recommence CCC meetings.	These actions are intended to be undertaken in 2025.
Schedule 5 Condition 12	Complete update of the strategies, plans, and programs required under this approval and submit to the Department.	As per response to Schedule 5 Condition 5A OFI.
EPL 13213 Condition A1.1	A variation of the EPL will be required prior to increasing the scale of activity permitted under MOD3 of the Project Approval.	This recommendation is noted. An application for an EPL variation will be lodged at the appropriate time.
EPL 13213 Condition O3.1	Continue to consider implementation of dust management measures, including those detailed in Dust Management Capacity Assessment, to minimise dust emissions.	As per response to Schedule 3 Condition 7 OFI.
EPL 13213 Condition M3.1	Prioritise submission of the revised EMS, including ensuring test methods are in accordance with "Approved Methods for the Sampling and Analysis of Air Pollutants in NSW", to the Department for approval. Obtain Department approval of the updated Air Quality Monitoring Program.	This recommendation will be actioned. Once all management plans are approved by the Department, the EMS will be reviewed and revised as necessary, prior to submission. Compliance with the approved methods will be ensured. With regard to the Air Quality Monitoring Program, refer to the response to the Schedule 3 Condition 9 OFI.
EPL 13213 Condition M3.2	Prioritise submission of the revised EMS, including ensuring test methods are in accordance with the "Approved Methods Publication", to the Department for approval.	As per response to EPL 13213 Condition M3.1 OFI.
EPL 13213 Condition U2.1	Continue to consider implementation of dust management measures, including those detailed in Dust	As per response to Schedule 3 Condition 7 OFI.

	Management Capacity Assessment, to minimise dust emissions.	
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