

230 Harbour Drive
Coffs Harbour, NSW 2450
Australia
www.ghd.com



Your ref: SSD 6624
Our ref: 2217528

29 June 2023

Department of Planning and Environment
12 Darcy Street
Parramatta NSW 2150

Slys Quarry – SSD 6624 – Independent Environmental Audit

Dear Sir/Madam

Please find attached the Independent Environmental Audit (IEA) for Slys Quarry, as per Condition 11, Schedule 5 of SSD 6624.

A response to the recommendations in the IEA are presented in Table 1 attached.

If you have any questions or require any further information in regards to these responses, please contact the undersigned or Mark Newman – Newman Quarrying on 0427 822 667.

Regards

A handwritten signature in blue ink that reads 'Ben'.

Ben Luffman
Technical Director - Environment
+61 2 6650 5613
ben.luffman@ghd.com

Table 1 IEA recommendations response

Assessment requirement	Comment and action / response recommendation	Newman Quarrying response
Schedule 3, Condition 21 The applicant must implement the approved Biodiversity and Rehabilitation Management Plan		
Soil and Water Management Plan (Rev 5, 2022) Mitigation measure SW02 Remove soil and stockpile for use in the rehabilitation works. Place stockpiles in a cleared area at least 20 m from a drainage line. Install a diversion bund immediately upgradient and a sediment fence immediately downgradient. Seed the stockpile with sterile grass cover to stabilise it.	Stockpiles inspected during the site audit have been well managed and are stabilised with establishing vegetation. Diversion bunds and sediment fencing is absent as the risk of soil loss from the stockpiles has been mitigated via vegetation cover. SWMP Rev 5 to include updated measure: Remove soil and stockpile for use in the rehabilitation works. Place stockpiles in a cleared area at least 20 m from a drainage line. Install a diversion bund immediately upgradient and a sediment fence immediately downgradient of stockpiles, until vegetation is established. Seed the stockpile with sterile grass cover to stabilise it.	The SWMP will be updated as recommended within 3 months.
Schedule 3, Condition 32 The applicant must implement the <u>approved</u> Biodiversity and Rehabilitation Management Plan		
Biodiversity and Rehabilitation Management Plan (Rev 0, 2017) Mitigation measure B7 The limits of clearing are to be clearly marked by protective fencing (i.e. 'no-go' areas)	At the time of audit inspection, BRMP Rev 0 (2017) was the approved plan used for audit purposes. No protective fencing was installed, however the limits of clearing were clearly marked. During the vegetation clearing, while there was no protective fencing installed, the limits of clearing however, were marked by flagging. No reported overcleaning incidents were reported for the audit period. BRMP to be updated to remove the requirement for "protective fencing" as current site practice is sound to remove the potential for environmental harm.	The BRMP will be updated as recommended within 3 months.
Biodiversity and Rehabilitation Management Plan (Rev 0, 2017) Mitigation measure B8 Prior to clearing, collect seed for use in rehabilitation works, especially <i>Hibbertia marginata</i> .	At the time of audit inspection, BRMP Rev 0 (2017) was the approved plan used for audit purposes. This mitigation measure was noted by Newman Quarrying as a redundant requirement, due to the fact rehabilitation will not occur for approximately 20 years, therefore it is considered highly unlikely any collected seed would be viable in 20 years' time.	The BRMP (Rev 6) includes the recommended control and was approved 18/05/2023.

Assessment requirement	Comment and action / response recommendation	Newman Quarrying response
	<p>It is noted that at the time of reporting, BRMP Rev 6, had been updated and approved by DPE (18th May 2023) to includes this measure:</p> <p>Twelve months prior to rehabilitation, collect seed from the area to use in rehabilitation works, especially <i>Hibbertia marginata</i>.</p>	
<p>Biodiversity and Rehabilitation Management Plan (Rev 0, 2017)</p> <p>Mitigation measure B9</p> <p>Six months prior to clearing, engage an experienced ecologist to undertake a pre-clearing survey and prepare a Nest Box Management Plan (NBMP), in consultation with OEH. This is to include:</p> <p>Identifying areas of weeds to be controlled prior to clearing.</p>	<p>Areas of weeds to be controlled prior to clearing are not included in pre-clearing surveys and the NBMP.</p> <p>Areas of weeds within the Expansion Project area (Stages 2 and 3) are not prevalent, therefore control was not deemed necessary. Subsequently, any commentary on this in the preclearing surveys and NBMP was also not captured.</p> <p>BRMP to be updated to revise the requirement to: Identifying areas of weeds to be controlled prior to clearing, <i>where applicable</i> / similar update, to capture weed control where required.</p> <p>Newman Quarrying to also consider a Management of Change Procedure, to capture the sound site-based practices, that are not consistent or reflected within approved management plans.</p>	<p>The BRMP will be updated as recommended within 3 months.</p>
<p>Biodiversity and Rehabilitation Management Plan (Rev 0, 2017)</p> <p>Mitigation measure B13</p> <p>Clearing is to be supervised by an experienced ecologist and a Clearing Report prepared</p>	<p>‘Clearing Reports’ were not provided nor were they prepared for the vegetation clearing areas, due to the fact that ‘Pre-clearing’ and ‘Clearing Reports’ had been combined into one report.</p> <p>BRMP to be updated to clarify/ rationalise what is required by a “six months prior to clearing, pre-clearing survey” (B9); “pre-clearing survey within 48 hours of clearing survey” (B11); and a “clearing report” (B13) to ensure these mitigation measures can be achieved on ground.</p>	<p>The BRMP will be updated as recommended within 3 months.</p>
<p>Biodiversity and Rehabilitation Management Plan (Rev 0, 2017)</p> <p>Mitigation measure B14</p> <p>Prior to clearing, contact the local veterinarian to warn them their assistance may be required if any wildlife are injured during clearing.</p>	<p>Anecdotal evidence suggest that this was undertaken prior to clearing in 2021, however was discontinued due to apparent lack of interest by local veterinarians.</p> <p>BRMP to be revised to include updated measure:</p> <p>Prior to clearing, contact the local veterinarian/ WIRES to warn them their assistance may be required if any wildlife are injured during clearing. In the event fauna are injured, fauna rescue and/or relocation can only be carried out by the Project Ecologist who is suitably trained, certified, licenced and experienced to handle and relocate wildlife.</p>	<p>The BRMP will be updated as recommended within 3 months.</p>