



FINAL

Environmental Management Strategy

Hard Rock Quarry, Karuah East, NSW

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GSS ENVIRONMENTAL
Environmental, Land and Project
Management Consultants

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1.0 INTRODUCTION

1.1 Scope of the Environmental Management Strategy

GSS Environmental was engaged by Karuah East Quarry Pty Ltd (Karuah East) to assist in designing an Environmental Management Strategy (EMS) for the operations of the proposed hard rock quarry located near Karuah in the Hunter Valley, NSW.

This EMS includes an overview of the environmental management and monitoring strategies proposed for the quarry. This EMS will provide guidance and direction to the quarry operator and incorporate the Karuah East environmental policies, procedures and management plans, as well as relevant legislation, guidelines, standards and policies to ensure best practice environmental management on the site.

The EMS will be applicable to all persons working at the quarry, including contractors and visitors to the site. Where contractors may be responsible for the management and/or maintenance of a specific site operation, they may be required to prepare and implement their own EMS in addition to complying with the requirements of this EMS. Where this is required, Karuah East will provide the contractor with details of the required content and format.

The EMS will be continually updated; responding to changes in the operation, changes in legislation, results of any independent environmental audits, and to reflect changes as part of the management review and continuous improvement process.

1.2 Background

1.2.1 Site Location

The proposed Karuah East hard rock quarry is located approximately 3km north of the township of Karuah, NSW, within the Great Lakes Local Government Area.

The extraction area of the quarry would comprise approximately 14.4 ha and would be predominately contained within Lot 12 DP 1024564, with the associated processing and facilities area located within Lot 13 DP 1024564. Together these two areas comprise the 'Project Site' with all disturbance areas contained within these two allotments.

1.2.2 Site Operations

Karuah East proposes to extract hard black basalt material "andesite" from the Project Site, which will generally involve:

- removal and stockpiling of vegetation;
- stripping of topsoil;
- blasting the quarry face;
- ripping and removal of the material by excavator and truck to the stockpile area;
- crushing and sorting of raw material ready for transport; and
- progressive rehabilitation of worked quarry areas when available.

Up to 1.5 million tonnes of material is proposed to be extracted from the site per annum from a total resource of approximately 29 million tonnes.

The proposed infrastructure at the quarry will include office buildings, workshops, parking areas, crushing plant, wash plant, weigh bridge and product storage areas.

2.0 ENVIRONMENTAL POLICY

2.1 Environmental Policy

The Karuah East Environmental Policy will represent a statement of its intentions and principles in relation to overall environmental performance, and will represent commitment from the Quarry Manager to the implementation of this EMS. The Policy will be designed to fulfill the expectations of all stakeholders in the project.

The Karuah East Environmental Policy will aim to:

- Provide a framework for action;
- Provide a setting for environmental objectives and targets;
- Comply with all applicable legal requirements, and with other requirements to which Karuah East subscribes relating to its environmental aspects;
- Promote continual improvement in environmental performance;
- Be the foundation of the EMS;
- Be a reference/baseline for company strategies, plans and actions.

Personnel on site will have access to copies of the Environmental Policy, which will be located in all office areas, crib rooms and training rooms. In addition, copies will be made available to any employee and external interested parties by contacting the Quarry Manager.

Communication of the Environmental Policy will form part of the environmental training and awareness program. All new starter employees will undergo an induction that includes specific reference to the Environmental Policy. In addition, the Environmental Policy will be routinely addressed in workforce training and awareness toolbox talks.

The Environmental Policy will be reviewed for its continuing appropriateness and applicability during the management review of the EMS (refer to Management Review Section below).

2.2 Environmental Procedures

The following environmental procedures are likely to be developed to assist in the management of potential environmental issues at the quarry. They aim to establish and maintain documented procedures for those aspects (operations and activities) of the quarry that have been identified as having the potential to cause significant environmental harm.

- Water Monitoring and Management;
- Biodiversity Management;
- Noise and Vibration (Blasting) Management;
- Transport Management;
- Air Quality and Greenhouse Gas Management;
- Heritage Management;
- Visual Management;
- Clearing and Topsoil Management;
- Quarry Closure and Rehabilitation; and

- Waste Monitoring and Management.

Environmental procedures will be reviewed regularly, and are intended to be altered as required to remain relevant to site activities. Additional procedures may be added as necessary.

Responsibilities of the Quarry Manager for the site's environmental procedures are outlined further below in **Section 4.1**.

2.3 Environmental Management Plans

Environmental Management Plans (EMPs) will be developed to assist in the management of any potential environmental issues associated with the quarry's operational activities. It is anticipated that the following EMPs may be required for the Karuah East quarry, which will be designed to comply with relevant statutory requirements.

- Air Quality Management Plan
- Soil & Water Management Plan
- Biodiversity Management Plan
- Noise & Vibration Management Plan
- Rehabilitation Management Plan
- Bushfire Management Plan
- Waste Management Plan

EMPs will be reviewed regularly to ensure that the environmental management details remain relevant to the quarry operations.

3.0 PLANNING

3.1 Environmental Aspects

To assist in developing and continually improving Karuah East's environmental procedures, an environmental risk assessment will be undertaken together with the relevant stakeholders to identify the quarry's main activities along with any associated potential environmental impacts.

The process of identifying the quarry's environmental aspects will involve generation of a risk register, which will capture any actual and/or potential environmental impacts, as follows:

1. Systematic identification of all activities undertaken by the quarry. Activities will include those that are infrequent, supporting activities such as administration and maintenance, and services provided by contractors. Specifically, the quarry's EMS Implementation Team will undertake the following:
 - o Interviews with key operational personnel;
 - o Reviewed all relevant environmental assessment and supplementary reports;
 - o Site inspections of the project site; and
 - o Consultation with key regulatory organisations.
2. Identification of the ways those activities can interact with the environment.
3. Identification of the environmental impacts associated with the environmental aspects. The following key areas are considered to be relevant to the quarry:
 - o Soil and Water;
 - o Biodiversity;
 - o Noise and vibration;
 - o Cumulative impacts with reference to access arrangements, traffic management, blasting schedules, noise and dust emissions, water management, land clearing, visual and lighting impacts, rehabilitation activities;
 - o Transport;
 - o Air quality;
 - o Greenhouse Gas;
 - o Heritage
 - o Visual;
 - o Quarry Closure and Rehabilitation;
 - o Waste; and
 - o Social and Economic.
4. Analysis of the risks to determine risk levels.
5. Evaluation of the risks to determine which environmental aspects and impacts are significant risks to the environment and/or the quarry.

3.2 Legal and Other Requirements

3.2.1 Legal and Non-Legal Requirements

To maintain regulatory compliance, Karuah East is committed to comply with the legal requirements of environmental legislation relevant to the proposed quarry operations. These legal requirements have been taken into account as part of establishment, implementation and maintenance of this EMS.

3.2.1.1 Requirements Register

The Requirements Register is a key list of, but not limited to, Commonwealth, State and Local legislation, Industry Codes of Practice, regulations, permits, licences, contracts, agreements with other stakeholders and industry guidelines relevant to the quarry.

While every attempt will be made to include all relevant information, the register is dynamic. To keep the register up-to-date, any additional requirements will be added to the register as identified by the Quarry Manager.

3.2.1.2 Amendments and Updates of Environmental Legislation

Amendments and updates to relevant legal and the other relevant documentation will be recorded and maintained in the register. Sources of these amendments and advice may include, but not limited to:

- Advice received from commonwealth, state and local government bodies;
- Websites and e-mail updates from the various government agencies;
- Direct access of (Federal, State and Local) legislation; and
- Other relevant references such as,
 - Releases and notification from relevant industry/quarry organisations and professional bodies (e.g. NSW Minerals Council);
 - Advice received from legal advisors; and
 - Subscription to Australian Standards (where available).

3.2.2 Authority Requirements

Karuah East is committed to complying with the relevant authority requirements (such as, but not limited to development consents and environment protection licences) issued by the relevant regulatory organisations. Up-to-date copies of these requirements will be held at both the quarry site and in the company head office.

The Quarry Manager is responsible for ensuring that the conditions contained within the relevant authority requirements are met, and where required, that the relevant governing bodies are notified of any change that may result any the licence or permit being reviewed or amended.

3.2.3 Standard Environmental Conditions (Contractors & Sub-Contractors)

All contractors and subcontractors working at the quarry will be required to undertake their work on site in accordance with the Karuah East EMS, which is designed to comply with all applicable laws, regulations, standards and consents to the quarry.

The Quarry Manager will ensure that a copy of the EMS is attached to all scope of works put out for tender and that the successful tender applies the principles of the EMS when working on site. This will be achieved by incorporating the activities of the contractor/subcontractor into the monthly environmental inspections for the site.

3.3 Objectives, Targets and Programs

3.3.1 Overview

Environmental objectives are the overall goals that Karuah East sets itself to achieve. Environmental targets are detailed performance requirements that arise from Karuah East's environmental objectives.

The purpose of establishing and maintaining such environmental objectives and targets is to ensure its commitment in the prevention of environmental pollution, compliance with its regulatory requirements, and continual improvement in Karuah East's environmental performance.

3.3.2 Responsibility for Environmental Objectives and Targets

All employees and contractors engaged at the quarry are required to consider the environmental objectives and targets that will be established for the site.

This EMS requires roles, responsibilities and authorities of various positions at the quarry to be documented and communicated. **Section 4.1** further below outlines the roles and responsibilities expected from the Karuah East environmental and management staff.

3.3.3 Establishment and Review of Environmental Objectives and Targets

The following are to be considered when establishing, reviewing, and improving the environmental objectives and targets:

- Legal requirements as detailed in the Requirements Register (see **Section 3.2**)
- Significant environmental aspects and associated impacts for the quarry (see **Section 3.1**);
- Available technology options;
- Financial, operational and business requirements; and
- The views raised by stakeholders through the environmental impact assessment and stakeholder consultation; and
- Targets should be specific, measurable and realistic.

Progress against the environmental objectives and targets will be reported in the Annual Environmental Management Report (AEMR) and be distributed to the relevant stakeholders as required.

4.0 IMPLEMENTATION AND OPERATION

4.1 Resources, Roles, Responsibility & Authority

4.1.1 Karuah East Quarry Manager

The Karuah East Quarry Manager will be responsible for:

1. Environmental Procedures (Section 2.2)

- Ensuring that all environmental procedures are undertaken accordingly;
- Establishing and maintaining the procedures for identifying and assessing the quarry's environmental aspects in accordance with the environmental risk register (see **Section 3.1**);
- Establishing and maintaining environmental procedures and controls for those high risk activities and operations identified; and
- Ensuring that all personnel undergo regular training on environmental procedures so that they are aware of the procedures and how they apply to the operation, as well as their own responsibilities.

2. Legal and Other Requirements (Section 3.2)

- Establishing and maintaining the Requirements Register;
- Passing on relevant information, particularly in relation to the obligation to prevent pollution, and offences and penalties, to all employees and contractors working at the quarry;
- Undertaking periodic audits to ensure satisfactory compliance with the statutes, codes of practice and industry guidelines as relevant to environmental management at the quarry;
- Ensuring key reporting timeframes are met;
- Demonstrating compliance with the statutes, codes of practice and industry guidelines by undertaking regular reviews and inspections and developing action plans to address any non-compliance(s); and
- Providing copies of the standard environmental conditions (see **Section 3.2.3**) to all sub-contractors working at the mine.

3. Competence Training and Awareness programs (Section 4.2)

- Ensuring that the processes and resources exist to adequately train all employees and contractors in the relevant environmental policy and environmental procedures for the quarry;
- Providing all necessary inductions for all persons at work, new starters, and visitors of the site;
- Developing a training requirements matrix to identify training needs of employees and contractors;
- Participating and running toolbox talks and other such forums where environmental training and awareness can be undertaken; and
- Maintaining records of all environmental training and awareness sessions, including but not limited to, attendees and the topic of discussion.

4. Documentation and Document Control (Section 4.4)

- Ensuring that the EMS is controlled in accordance with **Section 4.4** of this EMS.

- Ensuring that document control procedures are maintained and effective in enabling documents to be located, reviewed and revised as necessary and for current and obsolete documents to be easily identified;
- Undertaking a document audit as part of the management review process in accordance the EMS.

5. Emergency Preparedness and Response (Section 4.5)

- Promoting awareness of emergency response and preparedness;
- Identifying potential emergency situations;
- Developing and maintaining appropriate emergency response procedures;
- Providing and prominently displaying emergency telephone numbers and contacts at all site offices and work stations;
- Ensuring that all site personnel are trained in emergency response procedures, as appropriate to their position;
- Periodically testing and reviewing emergency procedures where practicable; and
- Reporting all incidents or accidents.

6. Environmental Compliance and Checking (Section 5.0)

- Ensuring the management and co-ordination of specialist consultants who undertake environmental performance monitoring on behalf of Karuah East;
- Responsible for collating all data as provided by specialist consultants and/or gathered on site and for inclusion in the AEMR;
- Ensuring that all incidents reported will be recorded and presented for discussion during toolbox talks where appropriate;
- Ensuring that all environmental incidents are reported in the AEMR in accordance with the relevant authority requirements (see **Section 3.2.2**);
- Ensuring that all major incidents will be reported to the relevant authorities as soon as practical after the incident;
- Establishing and maintaining procedures for identifying and correcting non-conformances with the EMS;
- Receiving notification of non-conformances or non-compliances from employees and any other contractors; and
- The development and distribution of action plans to remedy any non-conformances identified in a timely and effective manner.

4.1.2 All Persons at work

- All persons working at the proposed Karuah East hard rock quarry are responsible for understanding the Environmental Policy and standard environmental conditions.
- All minor environmental incidents are to be reported to the Quarry Manager using a nominated environmental incident reporting form, along with the inclusion of all relevant details on what happened, who was involved, what action was taken to clean up or contain the incident.

4.2 Competence, Training and Awareness

Karuah East will develop and maintain an environmental training and awareness program to provide the workforce (including subcontractors) with the knowledge and skills necessary to achieve environmental policy aims and objectives and to ensure a high standard of environmental management on the site.

Details below include (but not be limited to) a list of programs to help assist the workforce onsite.

4.2.1 New Starter Inductions (including contractors)

The Quarry Manager (or their nominated representative) will undertake a New-Starter Induction with all new employees prior to their commencement of works at the site. The induction will include, but not be limited to, information related to Karuah East Environmental Policy, various aspects of the EMS and will emphasise the roles and responsibilities of employees and contractors.

4.2.2 Visitor Induction

The Quarry Manager (or their representative) will ensure that all visitors to the site are taken through a brief environmental induction upon arrival at the site. The information given in the induction will ensure that the visitor is able to report any environmental incidents or issues that they may observe during their visit to the site.

4.2.3 Toolbox Talks

The Quarry Manager (or their representative) will undertake regular toolbox talks to discuss relevant environmental issues with the workforce. Additional Toolbox sessions will be scheduled if a particular environmental issue needs to be brought to the immediate attention of the workforce (e.g. following a major environmental incident).

4.2.4 Noticeboard Attachments

The Quarry Manager (or their representative) will place announcements on Notice Boards around the site to highlight various environmental issues as required.

4.3 Communication

Karuah East acknowledges the need for appropriate community consultation and sees stakeholder engagement as an integral component to environmental management at the site.

4.3.1 Company Website

Karuah East is committed to building a company internet website where all information about the quarry will be available for viewing. These will include, but not limited to, site contact details, annual reports, and forms.

In addition, a local intranet where internal documents, management plans, and reports can be made available and downloaded by the Karuah East staff and contractors.

The relevant authorities will be contacted as soon as the internet website is accessible and available to the public.

4.3.2 Internal Communications

Internal communications regarding environmental matters are maintained through a number of methods, which include, but not limited to, monthly environmental audit/inspection reports (see **Section 5.4**), toolbox talks and inductions (see **Section 4.2**).

4.3.3 Community Consultation

Karuah East will form a Community Consultative Committee (CCC) (if required by development consent) by sending out expressions of interest to the members of the local community to serve as members of a CCC.

Should two expressions of interest fails to be received by Karuah East to serve on the CCC, then in lieu of a CCC, Karuah East will implement the following consultation strategy throughout the quarry operations.

The consultation strategy outlines how Karuah East will advise Council and the nearby residents (including the local community) on its environment management plans, monitoring results, audit reports and complaints.

- **Communication with Council**
 - Provision of key details to contact Karuah East personnel. These can then be provided to the community on request. Where the details change, the Council will be notified in writing as soon as possible.
 - Provision of website details (when established) to download a copy of the Karuah East Community Feedback Form should any resident be interested in providing comment.
 - A copy of the AEMR will be sent to the Council, which will contain a summary of issues relating to its environmental management plans, monitoring results, audit reports or complaints. The report will also include directions on how the Council can get additional details to these issues and information on where the any environmental reports may be obtained.
- **Communication with the local community**
 - Provision of a website (when established) which can be used to provide contact details for the Karuah East personnel as well as providing the Community Feedback Form, AEMRs, and other relevant operational information.
- **Communication with nearby residents (within 2km of the quarry)**
 - All nearby residents within 2 km of the quarry will be contacted and provided with the Karuah East key contact name and phone numbers, as well as the Karuah East website address.

4.3.4 Complaints Management

A telephone number will be established by the quarry to enable the community to contact the quarry with any complaints or enquiries. The line will be available during normal office hours. All complaints received by the Quarry will be investigated as soon as possible after the event. The complainant will be verbally notified of the outcome from the investigation within three working days and where applicable, provide the necessary written responses within 10 working days, or otherwise agreed with the complainant.

Where a complaint is unresolved between Karuah East and the complainant, a dispute resolution process will be followed by Karuah East to resolve any disputes that may arise during the course of the development. This process will involve:

- commission a suitably qualified, experienced and independent person (whose appointment has been approved by DoPI) to undertake the complaints investigation and if necessary, the independent person will provide relevant recommendations to appropriately address the issue; and
- Both parties will receive a copy of the complaints investigation report.

Where a complaint specifically relates to properties (within 1 km of the quarry) damaged as a result of blasting at the quarry, Karuah East will undertake an investigation in accordance with the noise and vibration management procedure.

All complaints (including the findings of any investigation) will be recorded on a standard complaints record form, and documented in the AEMR.

4.4 Documentation and Document Control

This EMS will be retained in a controlled format by the Quarry Manager. Management, retention, revision and superseding of environmental documentation are the responsibility of the Quarry Manager.

The purpose of establishing and maintaining procedures for controlling all EMS documentation is to ensure that all documents can be located, reviewed and revised as necessary and current and obsolete documents easily identified.

4.4.1 EMS Documents

If any part of the document is revised and changed, replacement versions will be sent out to all personnel registered as holding a controlled copy of the EMS. All copies of the old version will be destroyed, and the old master copy marked "*Superseded*" and filed in the central filing system.

4.4.2 Environmental Documentation

Copies of all environmental documentation referenced in the EMS will be kept in the main office filing system.

To ensure that document control procedures are maintained and effective in enabling documents to be located, reviewed and revised as necessary and for current and obsolete documents to be easily identified, the Quarry Manager will conduct a document audit as part of the management review process in accordance with **Section 6.0** of this EMS.

4.5 Emergency Preparedness and Response

Karuah East will develop a site Emergency Preparedness and Response Plan as part of their Safety Management System. This plan will be updated to ensure it addresses any significant *environmental* emergencies, and to ensure that an effective response is initiated to minimise any potential environmental impact should the unlikely event of an environmental emergency occur.

In addition, Karuah East will ensure that all employees and contractors at the quarry are aware of the Emergency Response and Preparedness Plan by means of a new starter induction and regular toolbox talks (see **Section 4.2**).

All incidents or accidents will be reported on a standard environmental incident form. Further details with regard to incident reporting and its requirements are further discussed in **Section 5.2** of this EMS.

5.0 ENVIRONMENTAL COMPLIANCE AND CHECKING

5.1 Monitoring and Measurement

Compliance evaluation and review of environmental performance against relevant licences and approvals will be carried out annually as part of the AEMR in compliance with relevant Development Consent Conditions, and the EMPs developed for the quarry.

The Quarry Manager will be responsible for the management and co-ordination of specialist consultants who will undertake environmental performance monitoring on behalf of Karuah East. The Quarry Manager will also be responsible for collating all data as provided by specialist consultants and/or gathered on site and for inclusion in the AEMR.

5.1.1 Monitoring Equipment

Monitoring equipment will be installed, serviced and calibrated by qualified consultants where required. The consultants are required to maintain records of calibration and are to provide this information to the Quarry Manager on request.

5.1.2 Monitoring Standards and Guidelines

All monitoring will be carried out in accordance with the relevant Australian standards and guidelines applicable to each particular area. The Requirements Register will list the most recent and relevant standards and guidelines applicable to the Karuah East environmental monitoring requirements.

5.1.3 Chain of Custody Documentation

All samples required to be collected and sent from the quarry for further analysis will be accompanied by Chain of Custody (CoC) documentation. Only NATA (or equivalent) accredited laboratories will be used for the analysis of the various parameters required as part of the environmental monitoring and measurement for the quarry.

5.2 Reporting

5.2.1 External Environmental Reporting

The reporting of all monitoring and measurement data will be undertaken in accordance with the requirements of the AEMR and where required, any other annual reporting requirements from relevant authorities.

All monitoring records will be kept onsite for a period of four years. Copies of the AEMR will be retained by Karuah East's Head Office, and be sent to the relevant agencies.

5.2.2 Environmental Incident Reporting

All minor environmental incidents will be reported to the Quarry Manager on a standard environmental incident reporting form. The form will include detail on what happened, who was involved, what action was taken to clean up or contain the incident and recommendations for improvement so that the environmental incident can be avoided in the future.

Environmental incident reporting forms will be made readily available around the site.

All incidents reported will be presented for discussion during toolbox talks where appropriate, and all environmental incidents will be reported in the AEMR. In addition, all major incidents will be reported within 24 hours of the incident occurring to the relevant authorities.

5.3 Nonconformity, Corrective and Preventive Action

5.3.1 Review and Corrective Action

The purpose of this section is to establish and maintain procedures for identifying and defining the responsibility (and authority) for investigating and correcting environmental non-conformances. The Quarry Manager will be responsible for all review and corrective action necessary for the mitigation of Karuah East environmental non-conformances.

Non-conformance and corrective/preventative action forms will be created and used to document non-conformances or non-compliances identified as part of any audit or inspection described in **Section 5.4**, and to record the corrective/preventative actions to be adopted. Forms will be retained onsite for inspection purposes.

The non-conformance and corrective/preventative action form will document the following:

- Identify the root cause of the non-conformance or non-compliance;
- Identify and provide detail/procedure required to implement the necessary action to correct and prevent repetition of the non-conformance or non-compliance. This may include modifying the EMS;
- Assign a time frame to complete the necessary action; and
- Identify the individual(s) or department(s) responsible for the action.

Forms will be made available to document any activity that needs changing due to an actual incident occurring. They can also be used to identify and prevent the likelihood of an incident occurring (e.g. avoid potential spread of hydrocarbon spill/contamination by the installation of secondary bunding around fuel storage).

5.4 Audits and Inspections

The purpose of establishing and maintaining programs and procedures for periodic audits and inspections of the EMS is to determine the level of:

- conformance with environmental conditions of licences including the environmental protection licence, mining lease and development consent conditions; and
- on-site implementation and maintenance of the EMS.

5.4.1 Opportunistic Environmental Inspection

During normal operations the Quarry Manager will undertake routine inspections of activities around the quarry. Areas of non-compliance will be immediately brought to the attention of the employees so that they can be rectified to reduce the likelihood of an environmental incident occurring.

5.4.2 Monthly Internal Environmental Inspections

The Quarry Manager will undertake environmental inspections every month. The findings from the inspections will be reported internally.

5.4.3 Third Party External Environmental Audits and Inspections

Representatives from various regulatory agencies such as the NSW Office of Environment and Heritage and the Great Lakes Council, may undertake routine environmental compliance audits and site inspections as part of the regulatory assessment for annual reporting and licencing requirements. Audits and inspections are typically pre-arranged between both parties, however regulatory agencies have the discretion of undertaking these unannounced.

In addition to this, where required, Karuah East will engage the services of a suitably qualified “third party” to undertake compliance audits in accordance with relevant conditions and reporting requirements for the AEMR, as well as any additional requirements by relevant stakeholders.

6.0 MANAGEMENT REVIEW

The purpose of the management review is to assess the suitability and effectiveness of the EMS and to determine whether any changes in policy, objectives, methods or operations are considered necessary to meet the current or future needs of the quarry.

The Management Review will include scheduled, periodic and minuted meetings that will:

- Assess the continuing suitability and effectiveness of the EMS;
- Assess the relevance of environmental commitments;
- Review outcomes of environmental audits, inspections and non-conformances since the last management review meeting;
- Documentation of meeting decisions; and
- Assess the possible need for change in environmental policy and/or objectives and targets in light of changing circumstances and in view of continual environmental improvement.

The EMS will be reviewed:

- annually as part of the AEMR process;
- within three months following the completion of an Independent Environmental Audit; and
- as required by a significant change in the operation.

Details and documentation for all Management Reviews undertaken will be recorded on a Review and Feedback form.