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Writer: M Travers	Authorised by: D Cook

# Bringelly Brickworks

## Environmental

### Management Strategy

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#### Document Control

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## GLOSSARY AND ABBREVIATIONS

AHD	Australian Height Datum
CCC	Community Consultative Committee
CoA	Conditions of Approval for SSD_5684, including Modification 1
CSR	CSR Limited
DPI&E	Department of Planning Industry & Environment
DPIE	Department of Planning, Industry & Environment
ECT	Environmental Compliance Tracker
EIS	Environmental Impact Statement
EMS	Environmental Management Strategy
EP&A Act	Environmental Planning and Assessment Act 1979
EPA	NSW Environment Protection Authority
EPL	Environment Protection Licence
PIRMP	Pollution Incident Response Management Plan
POEO Act	Protection of the Environment Operations Act 1997
PGH	PGH Bricks and Pavers Pty Limited
RTS	Response to Submissions
Secretary, the	The Secretary of the DPI&E
SSD	State Significant Development
State and Regional Development SEPP	State Environmental Planning Policy (State and Regional Development) 2011

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## 1. INTRODUCTION

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### 1.1 Background

Bringelly Brickworks (the facility) is a clay/shale quarry and brick making facility located at 60 Greendale Road, Bringelly, on Lot 100 in DP 1203966 and comprises an area of approximately 385.55 hectares (refer Figure 1) in the Camden Local Government Area. The facility has been in operation since 1968, and in its original form it had the capacity to process approximately 51,500 tonnes of bricks per annum.

In 1991, Boral Bricks (NSW) Pty Limited undertook to upgrade the facility with new technology and increase production to ensure the continued economic viability of the site due to the age of the manufacturing plant and machinery. The Council of the Municipality of Camden, as the approving authority at the time, approved the Development Application on 13 September 1991 (Council ref. DA 91/1194). From 1991 until 2013, the Bringelly Brickworks facility operated under this approval, which permitted (among other things) quarry extraction up to 200,000 tonnes per annum, the receipt of up to 96,000 tonnes of supplementary materials and brick production up to 160,000 tonnes per annum.

In 2013, Boral Bricks Pty Limited (Boral) prepared an Environmental Impact Statement (EIS) to assess the environmental impacts of an increase in production at the facility and continued extraction of the quarry to meet the anticipated demand for its brick products ('Bringelly Brickworks Extension Project', Application No. SSD\_5684). The project was determined to be State Significant Development (SSD) under Part 4, Division 4.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and Clause 8 *State Environmental Planning Policy (State and Regional Development) 2011* (State and Regional Development SEPP).

The EIS was publicly exhibited from 6 November 2013 to 9 December 2013. The then Department of Planning & Environment (DP&E) received 12 submissions during this period, including 11 from public authorities and 1 submission from the general public who objected to the project due to its potential impacts. While none of the government authorities objected to the project, most raised concerns about its potential impacts and/or made recommendations for managing these impacts.

Boral prepared and submitted an initial Response to Submissions (RTS) to the DP&E in February 2014. However, following receipt of the RTS, DP&E received further correspondence from 7 public authorities which necessitated further consultation between Boral, DP&E and the relevant government authorities.

The additional consultation was resolved and in February 2015 DP&E finalised their Environmental Assessment Report and the Bringelly Brickworks Extension Project was approved with conditions on 3 March 2015.

On 1 May 2015, CSR Limited (CSR) and Boral Limited (Boral) formally completed the establishment of a joint venture for operations located in New South Wales, Victoria, Queensland, South Australia, Tasmania and the ACT. Ownership of Bringelly Brickworks (including quarrying activities) was transferred to the joint venture Boral CSR Bricks Pty Ltd (BCB), trading as PGH Bricks & Pavers. PGH Bricks & Pavers (PGH) was the controlling entity of the facility and responsible for implementing the Environmental Management Strategy of the

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site. On 31 October 2016 CSR agreed to acquire Boral’s interest in BCB, therefore resulting in CSR owning 100% of PGH. BCB no longer exists

Since Project Approval, the type of bricks demanded by the market have changed and Boral Bricks withdrew from the site. These two critical factors necessitated PGH to review its manufacturing requirements to ensure the most efficient use of all the resources available. To manufacture the bricks demanded by the market, the type, composition and quantity of the raw materials to be imported to Bringelly Brickworks was reconsidered because the type of raw materials required could not be solely extracted from the Bringelly quarry. PGH therefore applied to DP&E to modify SSD\_5684 under Section 96(1A) of the *Environmental Planning and Assessment Act 1979* (EP&A Act), to provide for an increased raw material import limit to 321,000 tonnes per annum (referred to as MOD1). MOD1 was approved by DP&E on 31 October 2016.

Bringelly Brick Works continued to operate under DA 91/1194, however approval for State Significant Development (SSD 5684) was issued in March 2015 for the extension of the quarry and to upgrade ancillary infrastructure.

Schedule 2, Condition 9 of SSD 5684 required PGH to surrender DA 91/1194 following commencement of development, as approved in SSD 5684. The SSD was triggered on 24 Feb 2020, and DA 91/1194 was surrendered to Camden Council.

In anticipation of the surrender of DA 91/1194, draft management plans were prepared in accordance with SSD 5684 and submitted to the Department of Planning and Environment (DP&E) on 21 February 2017 for comment. Consultation regarding these plans continues as required and modified plans were submitted for approval by DPI&E in Dec 2019. They were subsequently approved in Dec 2019.

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## 1.2 Site Location and Overview

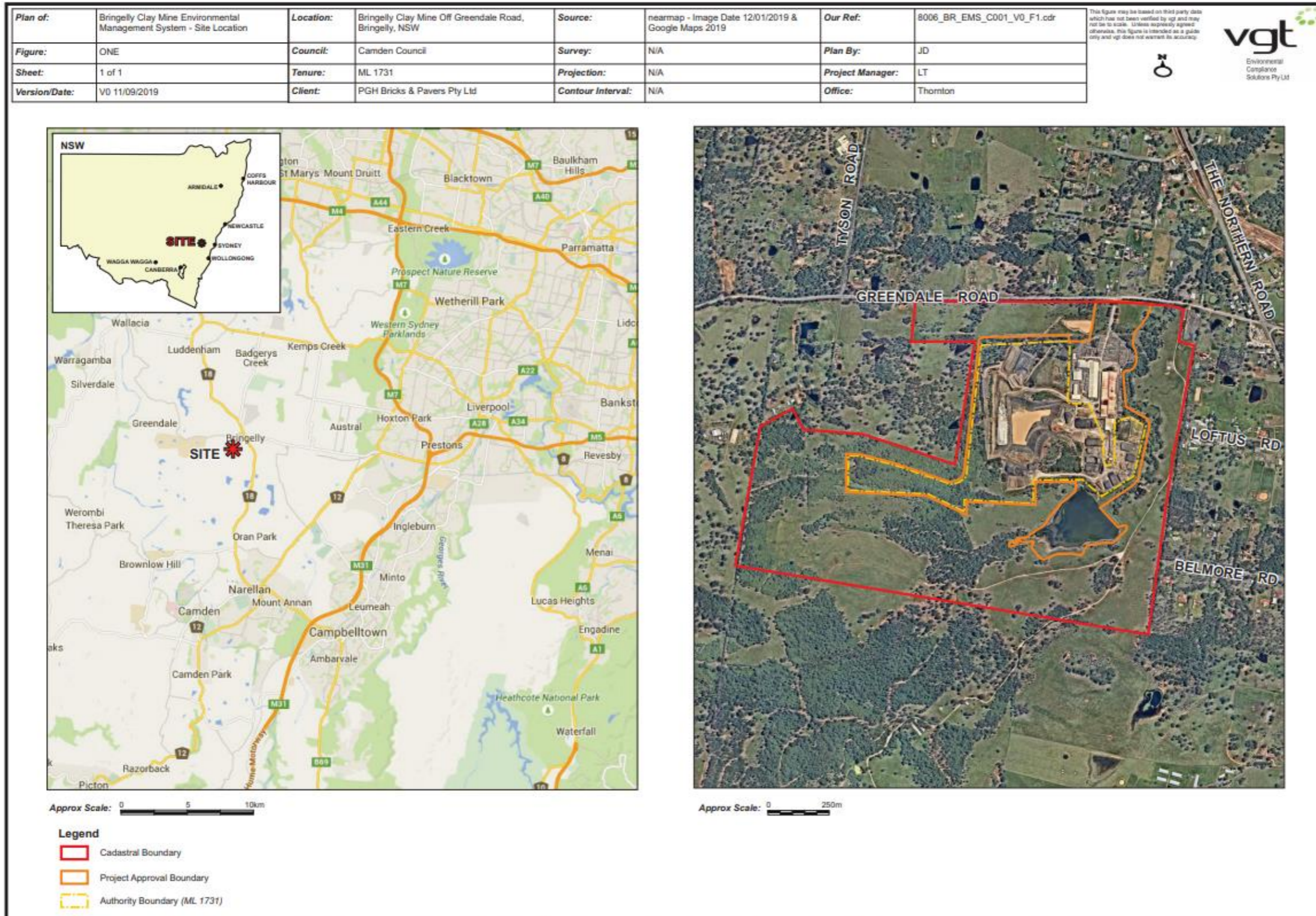
The project site is currently used for quarrying, brick production and associated activities. The brickworks and quarry are located on an approximately 385.55 hectare property owned by PGH, which is located at 60 Greendale Road, within the Camden local government area and is approximately 55 km southwest of the Sydney central business district (refer to Figure 1).

The brick making facility along with various administration buildings, a finished brick storage yard, staff car park and internal road network is generally contained within the northern part of the project site (refer to Figure 2), and is set back approximately 200 m from Greendale Road.

Existing quarrying activities have substantially altered the natural landform, with various voids and elevated stockpiles present in the active, north-western part of the project site. Other significant landforms on the site include the raw material stockpiles to the south of the brickworks, as well as unusable materials stockpiles along the western boundary of the site. The underlying topography of the operational footprint on the project site is relatively flat, and the land slopes to the south toward Thompsons Creek. The southern portion of the project site, adjacent to Thompsons Creek, is leased for the agistment of stock and grazing.

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**Figure 1 Project Layout Map**

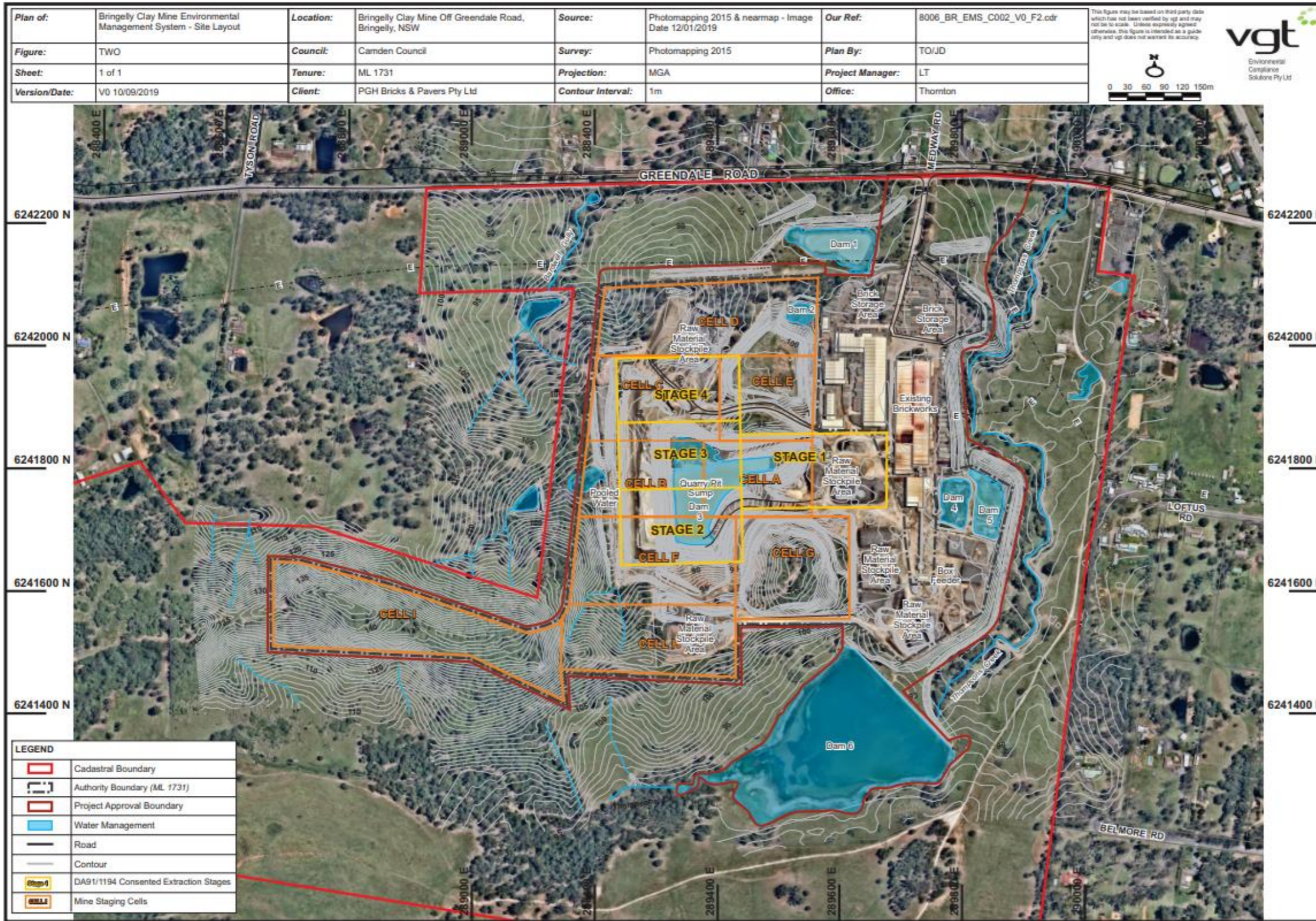


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Figure 2 Site Layout

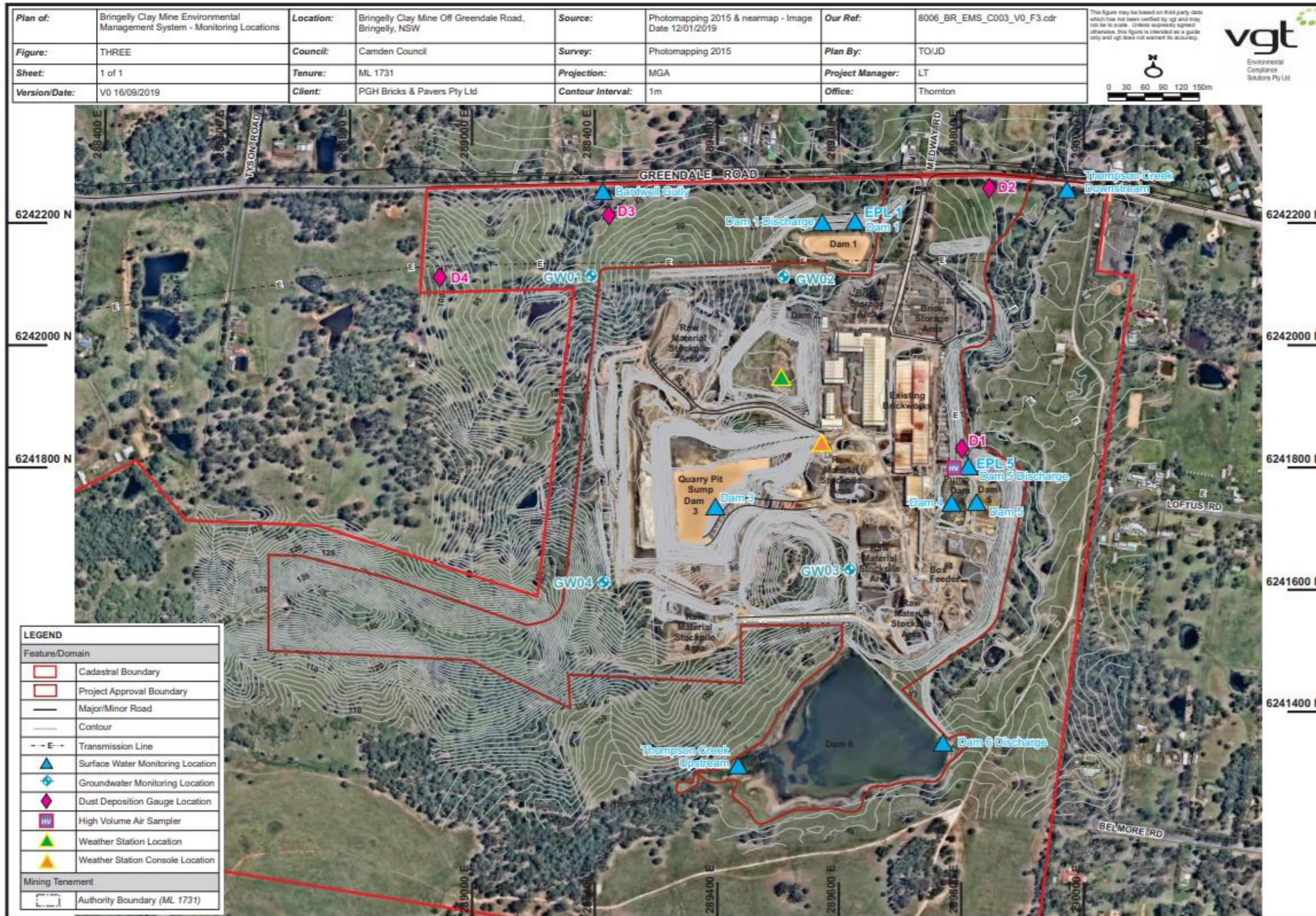


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**Figure 3 Environmental Points**



LEGEND	
Feature/Domain	
	Cadastral Boundary
	Project Approval Boundary
	Major/Minor Road
	Contour
	Transmission Line
	Surface Water Monitoring Location
	Groundwater Monitoring Location
	Dust Deposition Gauge Location
	High Volume Air Sampler
	Weather Station Location
	Weather Station Console Location
Mining Tenement	
	Authority Boundary (ML 1731)

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### 1.3 EMS Context

The purpose of this Environmental Management Strategy (EMS) is to ensure a consistent, structured approach to the management of environmental matters taking into consideration PGH’s Environmental Management Standards and the development approvals, permits and licences that are specific to Bringelly Brickworks.

This EMS and associated management plans have been prepared in compliance with the Conditions of Approval (CoA) issued for SSD Application No. SSD\_5684 (Appendix A) to demonstrate the strategic framework for the environmental management of the facility.

The EMS is applicable to all staff and sub-contractors associated with the lifecycle of the facility.

This EMS has been prepared in accordance with:

- Bringelly Brickworks and Quarry Expansion Environmental Impact Statement (5 September 2013);
- ‘Section 96(1A) Modification Supporting Information’, (August 2016, Element Environment) and Response to Submissions, September 2016;
- Bringelly Brickworks Extension Project (SSD\_5684) Conditions of Approval Mod 1, October 2016;

The EMS addresses the specific requirements of the CoA as outlined in Table 1.

**Table 1 Project Approval Conditions Cross-reference**

CoA no.	Requirement	Reference
Schedule 5, Condition 1	If the Secretary requires, the Applicant must prepare an Environmental Management Strategy for the development to the satisfaction of the Secretary. This strategy must:	This Plan
(a)	be submitted to the Secretary for approval within 6 months of the Secretary requiring preparation of the strategy by notice to the Applicant;	
(b)	provide the strategic framework for the environmental management of the development;	Section 2
(c)	identify the statutory approvals that apply to the development;	Section 4
(d)	describe the role, responsibility, authority and accountability of all key personnel involved in the environmental management of the development;	Section 2.5
(e)	describe the procedures that would be implemented to:	
	<ul style="list-style-type: none"> <li>• keep the local community and relevant agencies informed about the operation and environmental performance of the development;</li> </ul>	Section 8
	<ul style="list-style-type: none"> <li>• receive, handle, respond to, and record complaints;</li> </ul>	Section 8.2
	<ul style="list-style-type: none"> <li>• resolve any disputes that may arise during the course of the development;</li> </ul>	Section 8.3
	<ul style="list-style-type: none"> <li>• respond to any non-compliance; and</li> </ul>	Section 8.1
	<ul style="list-style-type: none"> <li>• respond to emergencies.</li> </ul>	Section 9, Appendix F, Appendix G
(f)	include:	
	<ul style="list-style-type: none"> <li>• copies of any strategies, plans and programs approved under the conditions of this development consent; and</li> </ul>	Refer Management Plans

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CoA no.	Requirement	Reference
	<ul style="list-style-type: none"> <li>a clear plan depicting all the monitoring required to be carried out under the conditions of this consent.</li> </ul> <p>The Applicant must implement any Environmental Management Strategy as approved from time to time by the Secretary.</p>	Figure 3
Schedule 5, Condition 5	Within 3 months of the submission of an:	Section 10
(a)	annual review under condition 4 above;	
(b)	incident report under condition 7 below;	
(c)	audit report under condition 9 below; and	
(d)	any modifications to this consent,	
	<p>the Applicant must review the strategies, plans and programs required under this consent, to the satisfaction of the Secretary. Where this review leads to revisions in any such document, then within 4 weeks of the review the revised document must be submitted for the approval of the Secretary. Note: The purpose of this condition is to ensure that strategies, plans and programs are regularly updated to incorporate any measures recommended to improve environmental performance of the development.</p>	

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## 2 ENVIRONMENTAL MANAGEMENT SYSTEM STRUCTURE

The EMS consists of this main document plus a series of environmental management sub-plans as outlined below:

- Noise Management Plan (NMP)
- Air Quality and Greenhouse Gas Management Plan (AQMP)
- Transport Management Plan (TMP)
- Water Management Plan (SWMP)
- Groundwater Management Plan (GWMP)
- Heritage Management Plan (HMP)
- Rehabilitation Management Plan (RMP)
- Biodiversity Management Plan (BMP)
- Emergency Management Response Plan (PIRMP)

The sub plans form appendices to the EMS and these documents provide detailed strategies for the planning, implementation, operation, inspection and monitoring requirements for a range of specific environmental issues. Once approved, all documents will be available from a publicly available website.

### 2.1 Overview of PGH Bricks & Pavers Environmental Management System

There are three primary drivers behind the establishment and implementation of the businesses environmental management system.

#### **PROTECT THE ENVIRONMENT**

To enable the environment to be effectively managed across a large, diverse organisation so that environmental impacts are avoided or minimised and a structured approach is provided to manage environmental issues, ensuring they are well understood and mitigated effectively.

#### **OPERATE WITHIN THE LAW AND MEET CORPORATE OBJECTIVES.**

To be clear about the legislative requirements in the jurisdictions in which it operates, PGH implements regular reviews of all Acts, Regulations, Codes of Practice, Standards and Guidance notes.

#### **ENSURE PEOPLE KNOW THEIR ENVIRONMENTAL RESPONSIBILITIES AND HOW THEY ARE TO BE MET**

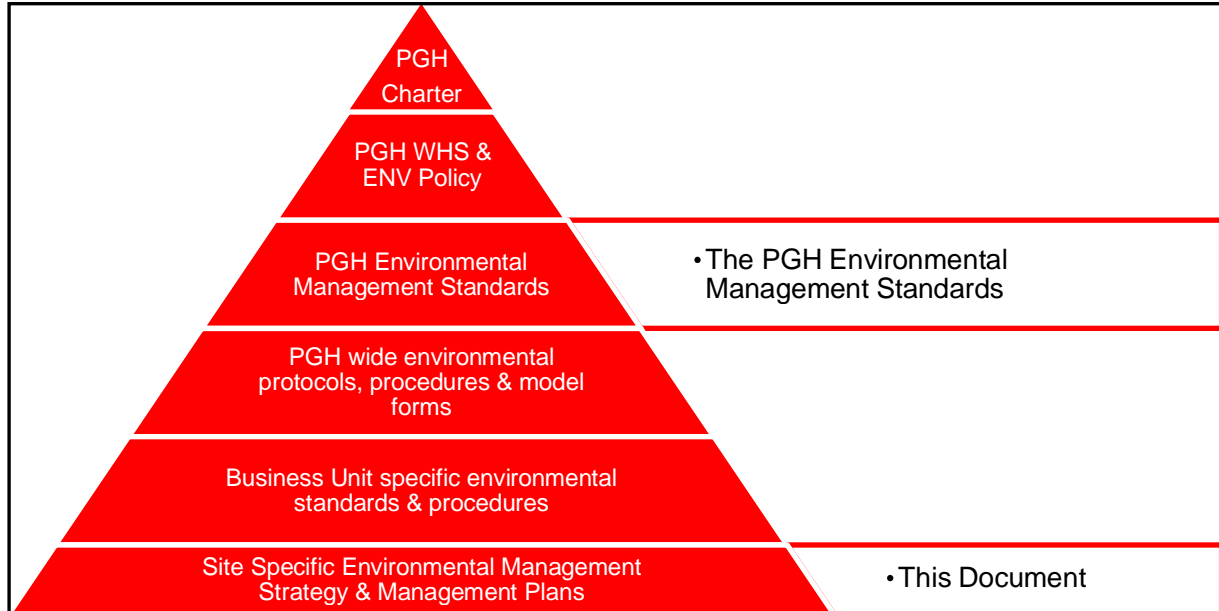
To establish confidence that PGH personnel have implemented and/or are working to specified environmental requirements, PGH conduct regular environmental audits of operations/sites. Environmental audits conducted use the ISO14001 standard in all large site audits in Australia and New Zealand or, if applicable, against a site's specific licence requirements. Smaller sites are audited against specific legal requirements. In addition, various government authorities have the power to audit sites.

The Environmental Management Standards have been developed to bring these three drivers together.

The Environmental Management Standards provide an umbrella document for all other environmental documentation produced within PGH (refer Figure 4). Although hierarchical,

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the intent is to avoid duplication. Business units and sites are encouraged to use procedures and forms from higher levels where they exist. If, however, a local version is developed, any procedures, forms or systems produced must meet and support the requirements of those of higher levels.



**Figure 4 PGH Environmental Management System**

## 2.2 Environmental Management Strategy Approval

This EMS must be endorsed by the facility’s Plant Manager and National Workplace Health, Safety and Environmental Manager prior to submission to the Secretary of the DPI&E.

All stakeholder and government agency consultation associated with the review of management plans identified in this plan is provided in a Consultation Annexure. If the Secretary requires, this EMS is to be submitted to the Secretary for approval within 6 months of the Secretary requiring preparation of the strategy, by notice to PGH.

This plan was submitted and approved Dec 2019, prior to triggering SSD on Feb 2020.

## 2.3 Objectives and Targets

Environmental objectives and targets have been established as a means of assessing environmental performance during the lifecycle of the facility. These objectives and targets have been developed with consideration of the key issues identified through the environmental assessment and risk assessment process. The objectives and targets are consistent with PGH’s WHSE Policy and will assist in monitoring whether the policy commitments are being met.

The performance of the development against the objectives and targets will be measured in regular reporting requirements and documented as part of the annual management review.

The overarching environmental objectives and targets for the facility are provided in Table 2. More detailed objectives and targets are identified in the relevant environmental management plans.

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**Table 2 Environmental Objectives and Targets**

Objective	Measurement	Target
Commence the implementation of development stages in accordance with environmental approvals.	Audits, regular reporting and annual management reviews.	Full compliance with statutory approvals.
Compliance with all legal requirements.	Audits, regular reporting and annual management reviews.	No regulatory infringements (PINs or prosecutions). No formal regulatory warning.
Engage with the affected community, minimise complaints and respond to any complaints within a suitable timeframe.	Review complaints register, regular reporting and audits.	All complaints responded to within the timeframes stipulated in this EMS. No complaints registered with DPI&E or EPA.
Continuously improve environmental performance.	Audits, regular reporting and annual management reviews.	No regulatory infringements (PINs or prosecutions). No formal regulatory warning.

## 2.4 Facility Environmental Obligations

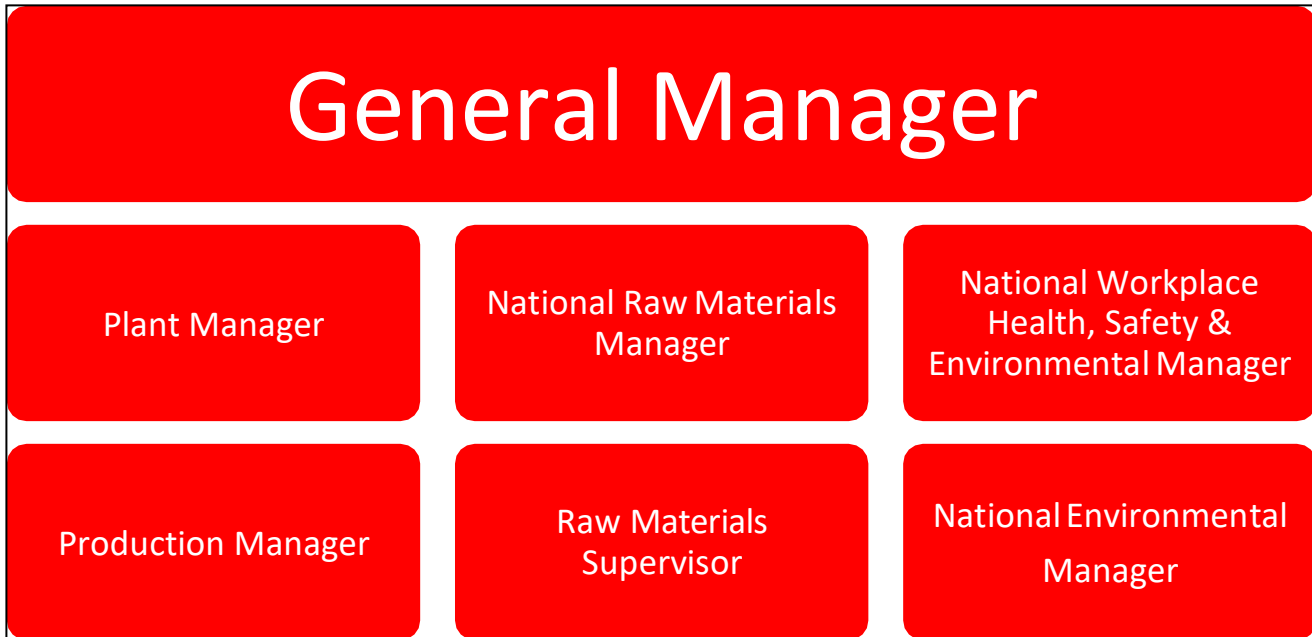
All personnel working at the facility have the following environmental obligations:

- minimise pollution of land, air and water;
- use pollution control equipment and keep it in proper working order;
- preserve the natural and cultural heritage environment;
- give notice to relevant authorities of a non-Aboriginal or Aboriginal heritage discovery;
- minimise the occurrence of offensive noise;
- be a good neighbour to surrounding land users;
- keep the community informed of development milestones, upcoming activities and duration of relevant aspects of the works; and
- take all feasible and reasonable steps to ensure compliance with the requirements of the EMS and associated management plans.

## 2.5 Resources, roles and responsibilities

The key environmental management roles and responsibilities for the facility are described in the following sections. The organisational structure of those roles that have environmental management responsibilities is presented in Figure 5.

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**Figure 5 Organisational Chart of Environmental Responsibilities**

### 2.5.1 General Manager

The environmental responsibilities of the General Manager involve the provision of adequate resources (personnel, financial and technological) to ensure effective development, implementation and maintenance of this EMS.

### 2.5.2 Plant Manager and National Raw Materials Manager

The environmental responsibilities of the Plant Manager cover the brickmaking and related transportation operations, and the National Raw Materials Manager is responsible for quarrying related operations, including:

- Overall responsibility for the management of environmental aspects of the facility;
- Ensure all works comply with relevant regulatory and statutory requirements;
- Endorse and support the WHSE Policy;
- Plan operational works in a manner that avoids or minimises impacts to the environment;
- Ensure the requirements of this EMS are fully implemented;
- Ensure personnel manage activities in accordance with statutory and approval requirements;
- Ensure that all relevant personnel receive appropriate induction training, including details of the environmental and community requirements;
- Ensure that complaints are investigated to ensure effective resolution;
- Ensure environmental management procedures and protection measures are implemented;
- Report immediately, any activity that has resulted, or has the potential to result in an environmental incident;
- Oversee site environmental monitoring, inspections and internal audits;



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- Undertake site inspections, carry out monitoring activities and complete site inspections checklists;
- Liaise with government authorities as required; and
- Stop work immediately where there is an actual or potential risk of harm to the environment.

### *2.5.3 Production Manager and Raw Materials Supervisor*

The environmental responsibilities of the Production Manager (brickworks) and Raw Materials Supervisor (quarrying) include:

- Assist the Plant Manager / Raw Materials Manager with the implementation of all environmental management responsibilities;
- Communicate with all personnel and contractors regarding compliance with the EMS and site-specific environmental issues;
- Co-ordinate the implementation of the EMS;
- Co-ordinate the implementation and maintenance of pollution control measures;
- Undertake site inspections, carry out monitoring activities and complete site inspections checklists;
- Advise on the day-to-day environmental elements of operations;
- Co-ordinate actions in emergency situations and allocate required resources; and
- Stop activities where there is an actual or potential risk of harm to the environment and advise the Plant Manager / Raw Materials Manager.

### *2.5.4 National Workplace Health, Safety & Environmental Manager*

The environmental responsibilities of the National Workplace Health, Safety & Environmental Manager include:

- Assist in development, monitoring and updating of the EMS and associated plans;
- Report to General Manager on the performance and implementation of the EMS;
- Ensure management reviews of the EMS are undertaken annually, documented and actions implemented;
- Identify where environmental measures are not meeting the set targets and where improvement can be achieved;
- Ensure environmental protocols are in place and managed;
- Assist in achieving environmental compliance;
- Obtain and update all environmental licences, approvals and permits as required;
- Manage environmental document control, reporting and training;
- Prepare and/or distribute environment awareness notes;
- Review and approve Erosion & Sediment Control Plans;
- Develop induction, toolbox talks and other training programs regarding environmental requirements for all relevant site personnel;
- Notify relevant authorities in the event of an environmental incident and manage close-out of these;

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- Stop activities where there is actual or potential risk of harm to the environment or to prevent an environmental non-conformance and advise the General Manager, Plant Manager and Production Manager; and
- Assist the Plant Manager / Raw Materials Manager to resolve environment-related complaints.

### 2.5.5 National Environmental Manager

The environmental responsibilities of the National Environmental Manager include:

- Assist in preparing the EMS (including any future revisions);
- Develop Erosion & Sediment Control Plans in consultation with the Production Manager and other relevant site personnel, as required;
- Ensure monitoring records are appropriately maintained, reviewed and any non-compliance issues addressed;
- Record and provide written reports of non-conformances with the EMS or corrective actions required, to the National Workplace Health, Safety & Environmental Manager. This may include the need to implement additional measures or revise existing measures;
- Assist in identifying environmental risks;
- Advise the National Workplace Health, Safety & Environmental Manager, Plant Manager and/or Raw Materials Manager of the need to stop work if there is the potential for an unacceptable impact on the environment;
- Advise the Plant Manager, Raw Materials Manager or site staff to take reasonable steps to avoid or minimise impacts;
- Advise site staff on issues concerning development environmental matters;
- Assist in developing training programs regarding environmental requirements and deliver the environmental component of toolbox talks; and
- Stop activities where there is an actual or immediate risk of harm to the environment and advise the General Manager, Plant Manager, Production Manager, Raw Materials Manager, Raw Materials Supervisor and National Workplace Health, Safety & Environmental Manager.

## 2.6 Contractor management

All relevant contractors are required to attend a site induction (section 7.1) where the requirements and obligations of the EMS and associated management plans are communicated or covered in task specific SWMS/JSEA. A record of all contractor inductions will be maintained as part of the induction and training register.

Contractor's performance will be monitored to assess:

- Contractor general work practices;
- The effectiveness of contractor environmental protection measures;
- Contractor compliance with the requirements of this EMS and associated management plans, strategies and codes; and
- The maintenance of environmental measures.

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### 3 APPROVED DEVELOPMENT

The key components of the Bringelly Brickworks Extension Project are reproduced in Table 3.

**Table 3 Key Components of the Project**

Aspect	Summary
Project Summary	<ul style="list-style-type: none"> <li>Expanding the existing extraction area and continuing brick making activities;</li> <li>Extracting up to 200,000 tonnes of clay/shale material a year;</li> <li>Importation of up to 321,000 tonnes of raw materials for brick making a year;</li> <li>Producing up to 263,500 tonnes of bricks a year;</li> <li>Handling, packaging, storing and transporting bricks by road;</li> <li>Exporting saleable overburden and spoil from the site;</li> <li>Constructing a new access driveway and 2 noise bunds;</li> <li>Upgrading and augmenting existing ancillary infrastructure; and</li> <li>Progressively rehabilitating the site.</li> </ul>
Project Life	To 2045
Total Resource	7.98 million tonnes (Mt)
Quarry Pit	<ul style="list-style-type: none"> <li>30.65 ha (compared with 9.9 ha under existing operations).</li> <li>Maximum depth of 46 m Australian Height Datum (AHD) (compared with 56 m AHD under existing operations).</li> </ul>
Extraction Method	No change. Ripping and excavating with dozer (no blasting proposed).
Quarry Campaigns	Three 44-day campaigns a year (compared with two 25-day campaigns a year under existing operations).
Extraction Staging	<ul style="list-style-type: none"> <li>Stage 1 – 1.75 Mt (cells A, B, C – deepening the existing extraction area by 10m);</li> <li>Stage 2 – 2.27 Mt (cells D, E, F); and</li> <li>Stage 3 – 3.96 Mt (cells G, H, I).</li> </ul> <p>Stage 1 would continue for about 9 years. The timing of stage 2 and 3 would depend on consumer demand.</p>
Imported Materials	Up to 321,000 tonnes of clay, shale and non-clay materials a year.
Brick Production	Up to 263,500 tonnes a year (compared with 160,000 tonnes a year under existing operations).
Brick Making	No change. Existing machinery and equipment would be used, including clay preparation equipment (crusher and grinder), brick forming and handling equipment, gas-fired kiln, brick dryer and brick unloading machine.
Product Transport	No change. Bricks would continue to be transported via Greendale Road (east of the project site) and The Northern Road, with up to 90 laden trucks to be dispatched per day. (540 per week)
Hours of Operation	No change. Extraction and transport: 6 am to 6 pm Monday to Friday, 6 am to 1 pm Saturday. Brick making and processing: 24 hours a day, 7 days a week.
Employment	76 full time employees and 10 contractors employed during quarrying campaigns.
Infrastructure	<p>Upgrade ancillary infrastructure including:</p> <ul style="list-style-type: none"> <li>small extensions to the clay preparation building and brick manufacturing plant;</li> <li>a new site access road from Greendale Road to the gatehouse in the north eastern corner of the site (140 m east of the existing site access road);</li> <li>two new recycled water storage tanks (maximum capacity of 50,000L);</li> <li>upgrade of the existing bio-cycle sewage treatment plant; and</li> <li>two new noise bunds, one adjacent to the northern boundary of the extraction area, the other adjacent to Greendale Road.</li> </ul>
Overburden	About 5.6 million tonnes of overburden would be generated. 35,500 tonnes would be used to construct the proposed noise bunds, and the remaining overburden would be used to progressively backfill the quarry void, or sold as clean fill for construction use.

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Aspect	Summary
Water Management	<ul style="list-style-type: none"> <li>Brick production would require up to 23.7 megalitres (ML) of potable water, which would be sourced from Sydney Water via existing watermains.</li> <li>Upgrade the existing water management system, which would have a total capacity of 441.87 ML.</li> </ul>
Biodiversity Offset	Clearance of 1.16 ha of mapped Existing Native Vegetation (ENV) would be offset in accordance with the Biodiversity Certification Order conferred on the Growth Centres SEPP through establishing a 1.93 ha on-site offset area.
Rehabilitation	Rehabilitate the site to enable maximum flexibility for a land use consistent with the Growth Centres SEPP.

### 3.1 Quarrying and Brickmaking Operations

The facility has approval to carry out quarrying and brick making operations until 1 March 2045. PGH is required to rehabilitate the site and carry out additional undertakings to the satisfaction of the Secretary of the DPI&E (the Secretary). Therefore, activities under SSD\_5684 may continue to apply beyond 1 March 2045, with the exception of quarrying activities, until the rehabilitation of the site and other undertakings have been carried out to the satisfaction of the Secretary.

### 3.2 Production Limits

The facility's production limitations are stipulated in SSD\_5684. According to these production limitations, the facility must not:

- Extract more than 200,000 tonnes of clay/shale from the site in any calendar year;
- Produce more than 263,500 tonnes of bricks at the site in any calendar year;
- Carry out quarrying operations beyond 46 m AHD; and
- Receive more than 321,000 tonnes of raw materials required for brick making to the site in any calendar year.

### 3.3 Transportation Limits

The facility's transportation limitations are stipulated in SSD\_5684. According to these transportation limitations, the facility must not:

- Transport more than 263,500 tonnes of bricks from the site in a calendar year;
- Receive more than 90 trucks to the site per day or more than 18 trucks per hour; and
- Dispatch more than 90 trucks from the site per day or more than 18 trucks per hour.

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### 3.4 Hours of Operations

PGH will comply with the following operating hours, as detailed in Schedule 3 condition 1 of SSD\_5684.

**Table 4**      *Operating Hours*

Activity	Operating Hours
Quarrying operations Deliveries Dispatch of finished bricks	6am to 6pm, Monday to Friday 6am to 1pm, Saturday No activities on Sundays or Public Holidays
Brick making operations (except dispatch of finished bricks)	24 hours a day, 7 days a week
Construction activities	7am to 6pm, Monday to Friday 8am to 1pm, Saturday No construction to be undertaken on Sundays or Public Holidays

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## 4 STATUTORY APPROVALS

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### 4.1 Environmental Legislation

The following legislation is relevant to the project:

- Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act);
- Environmental Planning and Assessment Act 1979 (EP&A Act);
- Water Management Act 2000;
- Protection of the Environment Operations Act 1997 (PoEOA);
- Protection of the Environment Operations (Clean Air) Regulation 2010;
- Biosecurity Act (2015);
- National Parks and Wildlife Act 1974 (NPW Act);
- Threatened Species Conservation Act 1995 (TSC Act);
- Native Vegetation Act 2003;
- Fisheries Management Act 1994;
- Contaminated Land Management Act 1997 (CLM Act);
- Roads Act 1993;
- Road Rules 2014;
- Mining Act 1992; and
- Local Government Act 1993.

### 4.2 Planning Instruments

The following planning instruments are relevant to the project:

- State Environmental Planning Policy (SEPP) (Major Development) 2005;
- SEPP (Mining, Petroleum Production and Extractive Industries) 2007;
- SEPP (Sydney Region Growth Centres) 2006;
- SEPP 33 Hazardous and Offensive Industries;
- SEPP 44 Koala Habitat Protection;
- SEPP 55 Remediation of Land;
- Liverpool Local Environmental Plan; and
- Camden Local Environmental Plan.

### 4.3 Permits and Licensing

The facility maintains a number of existing approvals, permits and licenses. All necessary licences, permits and approvals required for the facility will be obtained and maintained as required throughout its life.

#### 4.3.1 Environmental Protection Licence 1808

The Environmental Protection Licence (EPL, Appendix B) requires the monitoring of the discharges to air through kiln stacks and discharges to water. The Stack is to be monitored at the kiln for hydrogen fluoride, nitrogen oxide and total solid particles. Water is monitored at Points 1 and Point 5 for oil and grease, pH and turbidity. Point 5 also requires conductivity to be monitored. There are also the following noise limits:

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#### *L4 Noise limits*

*L4.1 Noise from the mobile plant must not exceed an LA10 (15 minute) noise emission criterion of 35 dB(A) at all times.*

*except as expressly provided by this licence.*

*L4.2 Noise from the premises must not exceed an LA10 (15 minute) noise emission criterion of 35 dB(A) at all times.*

*except as expressly provided by this licence.*

*L4.3 Noise from the premises is to be measured or computed at any point within 30 metres of the most affected residence to determine compliance with condition L4.1 and L4.2. 5dB(A) must be added if the noise is tonal or impulsive in character.*

The EPA requires an Annual Return submitted electronically in the required format.

#### **4.3.2 Mining Lease 1731**

The site is subject to Mining Lease (ML) 1731, issued under the NSW Mining Act 1992. The ML requires the preparation of a Mining Operations Plan (MOP) that details how mining operations will be undertaken in such a way as to prevent or minimise harm to the environment. This MOP is reviewed annually in the Annual Review (section 10.1).

#### **4.3.3 Water Licences**

The site benefits from the licences and approvals outlined in Table 5. Conditions are included in Appendix D. Compliance against these conditions will be reported in the Annual Review (section 10.1).

**Table 5 Water Access Licences and Works Approvals**

Number	Description	Expiry	Water Source
10CA104657	80mm centrifugal pump for Irrigation for WAL 26259	20/04/2026	Hawkesbury and Lower Nepean Rivers Water Source
WAL 26259	Unregulated River 150.00 units	20/04/2026	Upper South Creek Mangement Zone
10CA104630	100mm centrifugal pump and Bywash Dam for WAL 26257 & 25987	18/06/2025	Hawkesbury and Lower Nepean Rivers Water Source
WAL26257	Domestic and Stock 6.50 units	18/06/2025	Upper South Creek Mangement Zone
WAL25987	Unregulated River 152.50 units	18/06/2025	Upper South Creek Mangement Zone
10BL605770	4 Monitoring Bores	Perpetuity	

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## 5 IMPLEMENTATION & OPERATION

In addition to meeting the specific performance measures and criteria established under the approval, PGH will implement all reasonable and feasible measures to prevent, and if prevention is not reasonable and feasible, minimise, any material harm to the environment that may result from the construction and operation of the project, and any rehabilitation required under the approval.

### 5.1 Environmental Aspects and Impacts Register

PGH have adopted a risk management approach to determining the severity and likelihood of an activity's impact on the environment and to prioritise its significance. This process considers potential regulatory and legal risks as well as taking into consideration the concerns of the community and other key stakeholders.

The objectives of the risk assessment are to:

- identify activities, events or outcomes that have the potential to adversely affect the local environment and/or human health/property;
- qualitatively evaluate and categorise each risk item;
- assess whether risks can be managed by environmental protection measures; and
- qualitatively evaluate residual risk after the implementation of environmental protection measures.

The Plant Manager (or delegate) will be responsible for maintaining a register of aspects and impacts in consultation with site personnel. This register is intended to be a “living document” which is updated with the changing environment of the development.

### 5.2 Management Plan Requirements

PGH will ensure that the management plans required under the approval are prepared in accordance with any relevant guidelines, and include:

- a) a summary of relevant background or baseline data;
- b) a description of:
  - the relevant statutory requirements (including and relevant approval, licence or lease conditions);
  - any relevant limits or performance measures/criteria; and
  - 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) a description of the measures to be implemented to comply with the relevant statutory requirements, limits, or performance measures/criteria;
- d) a program to monitor and report on the:
  - impacts and environmental performance of the development; and
  - effectiveness of any management measures (see (c) above);



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- e) 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;
- f) a program to investigate and implement ways to improve the environmental performance of the project over time;
- g) a protocol for managing and reporting any:
  - incidents;
  - complaints; and
  - non-compliances with statutory requirements;
- h) a protocol for periodic review of the plan; and
- i) a document control table that includes version numbers, dates when the management plan was prepared and reviewed, names and positions of the person/s who prepared and reviewed the management plan, a description of any revisions made and the date of the Secretary's approval.

PGH will continue to apply existing management plans, strategies or monitoring programs approved prior to the approval of any modified plans, until the approval of a similar plan, strategy or program.

Where the conditions of approval require consultation with an identified party, PGH will:

- consult with the relevant party prior to submitting the subject document to the Secretary for approval; and
- provide details of the consultation undertaken within the relevant document or Annexure, including:
  - the outcome of that consultation, matters resolved and unresolved; and
  - details of any disagreement remaining between the party consulted and the operator and how any unresolved matters have been addressed.

### 5.3 Construction Environmental Management

All new buildings and structures, and any alterations or additions to existing buildings and structures, that are part of the project, will be constructed in accordance with the Building Code of Australia. All demolition work will be carried out in accordance with the relevant Australian Standard, as may be updated from time to time.

All tanks and similar storage facilities except those used for water will be constructed and appropriately bunded in accordance with the relevant Australian Standards.

Storage handling and transportation of dangerous goods will be undertaken in accordance with Australian Standards and the Dangerous Goods Code, as may be updated from time to time.

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## 5.4 Operational Environmental Management

All plant and equipment used on the site, or to monitor the performance of the project, will be maintained and operated in a proper and efficient condition. Monitoring locations are given on Figure 3

### 5.4.1 Extraction Limitations

A registered surveyor will mark out the boundaries of the approved extraction areas within the development area. These boundaries will be marked on site using large pegs with high visibility markings and a written explanation as to what they represent (eg NE cnr Extension) prior to the commencement of quarrying in each extraction area. The co-ordinates will be added to the appropriate Figure in the Annual Review, and submitted to the Secretary.

### 5.4.2 Noise

PGH will ensure that the noise generated by the development does not exceed the criteria in Table 6 at any residence on privately-owned land. The controls and procedures regarding noise management for the development are included in the Noise Management Plan.

**Table 6 Noise Criteria**

Activity	Receiver	Day / Evening / Shoulder dB(A) $L_{Aeq}(15min)$	Night dB(A) $L_{Aeq}(15min)$	Night dB(A) $L_{A1(max)}$
Brick making and quarrying	R1, R2	47	Not Applicable	
	R3, R4, R14	46		
	R15, R17	45		
	All other receivers	44		
Brick Making	All receivers	44	43	53
		<b>dB(A) <math>LA_{10}(15 min)</math></b>	<b>dB(A) <math>LA_{10}(15 min)</math></b>	<b>dB(A) <math>LA_{10}(15 min)</math></b>
Mobile Plant	30m from most affected residence	35	35	35
Premises	30m from most affected residence	35	35	35

PGH will manage noise generated during the construction of the new site access road and associated road alignment works, and the noise bund adjacent to Greendale Road, in accordance with the guidelines specified in Table 2 of the Interim Construction Noise Guideline. These management guidelines will apply to receivers 3 and 4.

PGH will:

- implement all reasonable and feasible mitigation measures to minimise construction, operational and road noise of the development;
- implement periods of respite during the construction of the new site access road and associated road alignment works, and the noise bund adjacent to Greendale Road;
- regularly assess noise monitoring data and relocate, modify and/or stop operations on site to ensure compliance with the noise criteria;

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- (d) maintain the effectiveness of noise suppression equipment on plant and equipment on site;
- (e) minimise the noise impacts of the development during meteorological conditions under which the noise criteria in this consent do not apply; and
- (f) carry out regular noise monitoring to determine whether the development is complying with the relevant conditions of the consent.

### 5.4.3 Air Quality

PGH will manage air quality impacts to ensure that particulate matter emissions from the project do not cause exceedances of the criteria in Table 7 at any residence on privately owned land, and generally in accordance with the Air Quality and Greenhouse Gas Management Plan (AQMP). The AQMP outlines the purpose, methodology and expected outcomes of the dust and stack monitoring, as well as control and mitigation measures to be undertaken to achieve the objectives and targets. PGH will:

- (a) implement all reasonable and feasible measures to minimise the stack and dust emissions of the development;
- (b) minimise surface disturbance and maximise progressive rehabilitation;
- (c) minimise the air quality impacts of the development during adverse meteorological conditions and extraordinary events; and
- (d) monitor and report on compliance with the relevant air quality conditions in the consent and EPL.

**Table 7 Air Quality Criteria**

Pollutant	Averaging Period	Criterion*
Total Suspended Particulates (TSP)	Annual	90 µg/m <sup>3</sup>
Particulate Matter <10 µm (PM <sub>10</sub> )	Annual	30 µg/m <sup>3</sup>
Particulate Matter <10 µm (PM <sub>10</sub> )	24 hour	50 µg/m <sup>3</sup>
Deposited Dust	Annual	2 g/m <sup>2</sup> /month (inc over background) 4 g/m <sup>2</sup> /month (maximum)
<b>Stack Emissions:</b>		
Sulphur Dioxide	10 minute	712 µg/m <sup>3</sup>
	1 hour	570 µg/m <sup>3</sup>
	24 hour	228 µg/m <sup>3</sup>
Nitrogen Dioxide	1 hour	246 µg/m <sup>3</sup>
	Annual	62 µg/m <sup>3</sup>
Nitrogen Oxides	N/A	2000 mg/m <sup>3</sup>
Hydrogen Chloride	1 hour	0.14 mg/m <sup>3</sup>
Total Solid Particles	N/A	100 mg/m <sup>3</sup>
Hydrogen Fluoride	N/A	50 mg/m <sup>3</sup>

\* Excludes extraordinary events such as bushfires, prescribed burning, dust storms, sea fog, fire incidents, illegal activities or any other activity agreed by the Secretary in consultation with EPA.

Meteorological monitoring will be undertaken using an onsite weather station sited in accordance with the *Approved Methods for Sampling of Air Pollutants in New South Wales* and capable of continuous measurement of relevant conditions.

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#### 5.4.4 Transport

PGH will keep accurate records of the:

- (a) tonnages of bricks transported from the site (monthly and annually);
- (b) amount of raw material imported to the site (monthly and annually); and
- (c) tonnages of each type of raw materials imported to the site (monthly and annually).

These records will be included in the Annual Review.

Sufficient parking will be available on-site for all development-related traffic, in accordance with Camden Council’s parking codes, as detailed in the Camden Development Control Plan, 2019. The Transport Management Plan, including the Drivers Code of Conduct, details how PGH will ensure that:

- (a) all development-related heavy vehicles enter and exit the site in a forward direction;
- (b) all laden vehicles entering or exiting the site have their loads covered (with the exception of vehicles carrying bricks);
- (c) all laden vehicles that have accessed the extraction and/or stockpile areas are cleaned of sand and other material that may fall on the road, before leaving the site;
- (d) all heavy vehicles exiting the site travel east of the site along Greendale Road to The Northern Road and/or Bringelly Road;
- (e) the dispatch of laden trucks is avoided during the peak drop-off and pick-up times at the Bringelly Public School to the greatest extent practicable, particularly prior to the upgrade of the Greendale Road/Bringelly Road intersection by RMS; and
- (f) no trucks queue at the entrance to the site before 6am.

#### 5.4.5 Soil and Water

PGH will ensure that it has sufficient water for all stages of the development, and if necessary, adjust the scale of operations to match its available water supply. A Site Water Balance has been calculated and will be updated in the Annual Review. All water discharges will comply with the limits in the EPL or Section 120 of the POEO Act.

**Table 8 Surface Water Monitoring**

ID	Description	Pollutants	Criteria	Frequency
EPL1	Dam 1	pH, conductivity, turbidity, oil & grease	6.5-8.5, NL, 150 NTU, 10mg/L	Weekly during discharge
EPL5	Dam 4	pH, conductivity, turbidity, oil & grease	6.5-8.5, 1450 µS/cm, 150 NTU, 10mg/L	<24 hrs prior to discharge
	Bardwell Gully	pH, conductivity, turbidity, oil & grease	Background	Monthly or prior to discharge
	Thompsons Creek Downstream	pH, conductivity, turbidity, oil & grease	Background	Monthly or prior to discharge

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ID	Description	Pollutants	Criteria	Frequency
	Thompsons Creek Upstream	pH, conductivity, turbidity, oil & grease	Background	Monthly or prior to discharge
	Dam 1 Discharge	pH, conductivity, turbidity, oil & grease	6.5-8.5, NL, 150 NTU, 10mg/L	Weekly during discharge
	Dam 3 Quarry Pit Sump	pH, conductivity, turbidity, oil & grease	6.5-8.5, NL, 150 NTU, 10mg/L	On occasion when required
	Dam 4	pH, conductivity, turbidity, oil & grease	6.5-8.5, 1450 µS/cm, 150 NTU, 10mg/L	On occasion when required
	Dam 5	pH, conductivity, turbidity, oil & grease	6.5-8.5, 1450 µS/cm, 150 NTU, 10mg/L	Weekly during discharge
	Dam 6 East	pH, conductivity, turbidity, oil & grease	6.5-8.5, 1450 µS/cm, 150 NTU, 10mg/L	On occasion when required

**Table 9 Groundwater Monitoring**

ID	Parameter	Criteria	Frequency
GW01 – GW04	Depth below ground level	Change greater than 30% from background	Monthly
	pH, conductivity, ORP, DO, Turbidity, Fluoride, anions, cations, nutrients, dissolved metals, BTEX, TRH, PAH, Phenolics.	Change greater than 30% from background	Quarterly
Excavated pit	Visible water inflow	Visible or measureable flow rate	Monthly or when observed

#### 5.4.6 Biodiversity and Rehabilitation

PGH will implement the Biodiversity Offset Strategy described in the EIS and detailed in the Biodiversity Management Plan to be prepared and submitted to the DPIE, OEH and Camden Council prior to undertaking quarrying operations in the extension area.

Within 2 years of notifying the Department of commencement of development, unless otherwise agreed with the Secretary, PGH will make suitable arrangements to provide appropriate long-term security for the offset area described in the EIS.

PGH will rehabilitate the site to the satisfaction of the Secretary in accordance with the objectives in Table 10.

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**Table 10 Rehabilitation Objectives**

Feature	Objectives
Site (as a whole)	Safe, stable and non-polluting. Restore ecosystem function, including maintaining or establishing self-sustaining ecosystems comprised of local native species and habitat.
Surface infrastructure	To be decommissioned and removed (unless the Secretary agrees otherwise).
Final void	Minimise the size, depth and slope of the batters of the final void. Minimise the drainage catchment of the final void.
Quarry pit floor	Landscaped and revegetated using native flora species, above the anticipated final void water level.
Community	Ensure public safety

PGH will rehabilitate the site progressively, that is, as soon as reasonably practicable following disturbance. All reasonable and feasible measures will be taken to minimise the total area exposed for dust generation at any time. Interim stabilisation measures will be implemented where reasonable and feasible to control dust emissions in disturbed areas that are not active and which are not ready for final rehabilitation. Details of control measures and procedures are given in the Rehabilitation Management Plan which will be prepared prior to undertaking quarrying operations in the extension area and submitted to the Secretary, OEH, DRE, NRAR and Camden Council. A Final Landuse Options Plan will be developed for the site within 2 years of commencing operations under the SSD consent.

#### 5.4.7 Heritage

PGH will manage identified heritage objects, previously unidentified heritage objects and the discovery of any human remains on site in accordance with the Heritage Management Plan (HMP). Ongoing consultation with Aboriginal stakeholders will be undertaken in accordance with the procedures outlined in section 8 and the HMP.

#### 5.4.8 Visual Impacts

PGH will establish a vegetation screen on all external site bunds, as soon as practicable after their construction, to minimise visibility of site infrastructure from outside the development area. All reasonable and feasible measures will be undertaken to minimise the visual and off-site lighting impacts of the development. All external lighting will comply with AS4282:2019 Control of the obtrusive effects of outdoor lighting (or as updated).

#### 5.4.9 Bushfire Management

PGH will ensure that the site is equipped to respond to any fires on site, and assist the Rural Fire Service, emergency services and National Parks and Wildlife Service as much as practicable if there is a fire in the surrounding area. The presence of a bushfire in the area will activate the PIRMP.

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#### 5.4.10 Waste

PGH will ensure that any waste on the site is minimised, and any waste generated will be appropriately stored, handled and disposed of. Where relevant, a Resource Recovery Exemption will be obtained under the POEO Act. All on-site sewerage treatment and disposal will be operated, stored and transported in accordance with EPA and Camden Council requirements.

Waste management and minimisation will be reported upon in the Annual Review.

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## 6 INSPECTIONS, MONITORING AND AUDITING

### 6.1 Environmental Inspections

#### 6.1.1 Monthly and post rainfall site inspections

The Plant Manager and/or Production Manager will undertake monthly inspections of the facility and after significant rainfall events to evaluate the effectiveness of environmental controls. Inspection findings will be recorded in an inspection checklist. If maintenance and/or deficiencies in environmental controls are observed, corrective actions will be recorded in the inspection checklist. Records will also include details of any maintenance required, the nature of the deficiency, any actions required and an implementation priority.

Environmental inspections will include as a minimum the following events:

- Spills of fuels, oils, chemicals and other hazardous materials;
- Unauthorised discharge from sediment basins or other containment devices;
- Unauthorised clearing or clearing beyond the extent of the identified disturbance areas;
- Inadequate installation and subsequent failure of temporary erosion and sediment controls;
- Unauthorised damage or interference to threatened species, endangered ecological communities or critical habitat;
- Unauthorised harm or desecration to Aboriginal objects and Aboriginal places;
- Unauthorised damage or destruction to any State or locally significant relic or Heritage item;
- Unauthorised dredging or reclamation works within a watercourse;
- Potential breaches of the Drivers Code of Conduct;
- Potential contamination of waterways or land;
- Accidental starting of a fire or a fire breaking out of containment;
- Any potential breach of legislation, including a potential breach of a condition of an EPL, CoA or any agency permit condition;
- Works undertaken without appropriate approval or assessment under the EP&A Act; and
- Unauthorised dumping of waste.

### 6.2 Environmental monitoring

The monitoring requirements of the CoA are listed in section 5.4 and addressed in the relevant environmental management plans. Any exceedances of environmental criteria will be immediately reported to the Secretary in accordance with section 8.1.

All environmental monitoring equipment shall be maintained and calibrated according to the manufacturer's specifications and appropriate records kept.

A summary of all monitoring results will be available on the website, tabled at CCC meetings, and provided in the Annual Review.



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## 6.3 Auditing and reporting

### 6.3.1 Internal audits

Internal audit requirements will be conducted on a risk-based approach, to verify compliance with:

- This EMS and associated management plans;
- CoA requirements; and
- Any relevant legal and other requirements (e.g. licenses, permits, regulations, contract documentation).

An audit checklist will be developed and amended as necessary to reflect changes to this EMS, subsequent approvals and changes to Acts, regulations or guidelines.

### 6.3.2 Independent external audits

Independent external auditing will be undertaken by an independent environment auditor in accordance with *ISO 19011:2003 - Guidelines for Quality and / or Environmental Management Systems Auditing*, as required by CoA Schedule 5, Condition 9. External auditing will be undertaken every three years, unless the Secretary directs otherwise, with the first audit being held within a year of commencing development under the SSD consent.

**Table 11 Audit requirements**

Audit Type	Requirement	Timing	Responsibility	Recipient
Internal audit	Verify compliance with CoA, EMS, legal requirements, permits and licences.	At planned intervals according to the PGH management review schedule.	National Workplace Health, Safety & Environmental Manager	Plant Manager
External independent audit	Verify compliance with CoA, EMS, legal requirements, permits and licences	First audit within a year from the date of SSD_5684; Every 3 years thereafter.	National Workplace Health, Safety & Environmental Manager	Plant Manager, DPIE

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## 7 COMPETENCE, TRAINING AND AWARENESS

To ensure that this EMS and associated management plans are effectively implemented, each level of PGH management is responsible for ensuring that all personnel reporting to them are aware of the requirements of this EMS.

### 7.1 Environmental induction

All personnel, including contractors, are required to attend a compulsory site induction that includes an environmental component prior to commencing work on-site. The Plant Manager (or delegate) will conduct the environmental component of the site induction. The environmental component will include an overview of:

- Relevant details of the EMS including purpose and objectives;
- Key environmental issues;
- Key conditions of environmental licences, permits and approvals;
- Specific environmental management requirements and responsibilities;
- Mitigation measures for the control of environmental issues;
- Adherence to the Drivers Code of Conduct, where relevant;
- Incident response and reporting requirements; and
- Information relating to the location of environmental constraints.

A record of all environment inductions will be maintained and kept on-site.

The Plant Manager may authorise amendments to the induction where required to address changing conditions on-site, legislative changes or amendments to this EMS or related documentation.

### 7.2 Toolbox talks, training and awareness

Toolbox talks will be used to raise awareness and educate personnel on environmental issues. The toolbox talks will be used to ensure environmental awareness continues during operations.

Toolbox talks will be tailored to specific environmental issues including:

- Erosion and sedimentation control;
- Hours of work;
- Emergency and spill response;
- Heritage;
- Threatened species, clearing controls and vegetation protection;
- Weed management;
- Noise;
- Housekeeping and waste;
- Development and clearing limits; and
- Dust control.

Targeted environmental awareness training will be provided to individuals or groups of workers with a specific authority or responsibility for environmental management or those undertaking an activity with a high risk of environmental impact.

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## 8 COMMUNICATION

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### 8.1 Incidents and Non-Compliances

PGH will immediately notify the Planning Secretary (and any delegates or successors) using the contact details provided by the Department, the EPA, the DRG and any other relevant agencies of any exceedance of any monitoring criteria or any other incident. Within 7 days of the date of the incident, PGH will provide the Secretary and any relevant agencies with a detailed report on the incident, and such further reports as may be requested. This report will include:

- The time and date of the incident,
- Details of the incident,
- Measures implemented, or to be implemented to ensure the event ceases and to prevent a re-occurrence, and
- Identify any non-compliance (including the condition and instrument breached) with:
  - conditions of approval SSD\_5684,
  - EPA licence 1808,
  - Mining Lease 1731, or
  - WALs 25987, 26257, or 26259.
- Remediation options to be implemented and/or any other course of action taken or to be taken.

Where the incident relates to an exceedance of monitoring criteria, the results of the monitoring will be supplied to the affected landowners for the following three months as a minimum and until the results are again compliant. If the exceedance relates to an air quality criteria, the affected landowners and current tenants will be supplied with a copy of the NSW Health Fact Sheet “Mine Dust and You”. Where an incident involves an Aboriginal site, relevant Registered Aboriginal Parties will be notified and their input sought in closing out the incident.

Within 3 months of submission of the incident report, PGH will review the suitability of all strategies, plans and programs related to the incident. Where this review leads to revisions in any document, then within 6 weeks of the review the revised document will be submitted for the approval of the Secretary.

Incident Reports will be tabled at the next CCC meeting. Where the incident relates to dust, the CCC will be informed of the potential health-related impacts associated with dust.

PGH will maintain records relating to environmental incidents.

### 8.2 Complaints and enquires procedure

PGH will implement a Complaints and Feedback mechanism to track, manage, monitor and respond to feedback or complaints from the general public and/or specific stakeholders. This procedure will also cover how communication (such as suggestions for improvement) from community members will be handled.

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A phone number, email and postal addresses that are monitored 24 hours and 7 days (Appendix H) for the lodgement of feedback, inquiries, complaints or other communication will be available, and all impacted stakeholders will be informed of its existence via letter drop, personal communications, web page, signage and through the CCC. All feedback will be recorded, monitored and managed in accordance with the *Privacy and Data Protection Act*.

In the event that a complaint/feedback is received, details to be recorded, where volunteered by the complainant, will include:

- Type of complaint, eg noise, air quality, water quality, transport issues;
- Location of event;
- Time of event;
- Extent and duration of event;
- Any additional details they wish to offer;
- Name and contact details of complainant; and
- Whether or not they wish to be contacted directly regarding their issue.

The first action will be to determine whether an incident has occurred (Section 8.1) or if the PIRMP is to be activated (Appendix E). The complaint/feedback will then be recorded in the complaints register and logged in the internal on-line management system, WHSE Live, to allow actions to be tracked, monitored and recorded. This system allocates the task to the relevant officer, provides for alerts and reminders on outstanding or upcoming tasks, monitors actions and timing, and allows tracking of trends and improvement opportunities.

An investigation will follow, and actions will depend on the nature of the activity that generated the complaint. Responsibilities lie with the Raw Materials Supervisor for quarrying related activities or the Plant Manager for brickmaking and transport related activities, or escalated to the WHSE Manager if necessary.

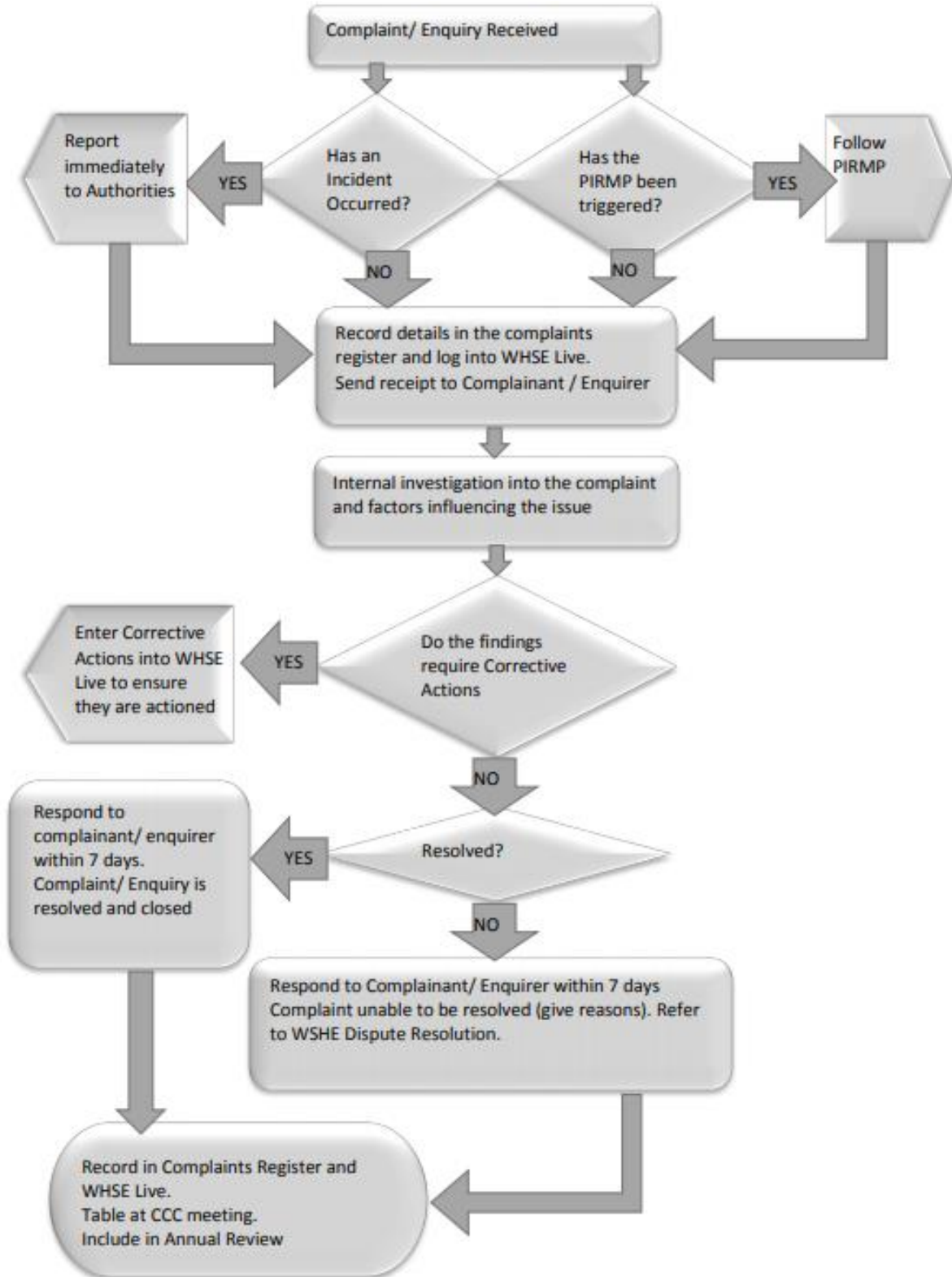
All parties involved in the complaint will be notified of the receipt of their complaint within 48 hours and contacted or consulted within seven business days. Urgent complaints will be addressed within 24 hours wherever possible. All complaints will be addressed and closed out with the complainants within a month of the initial date of submission of the complaint. Any corrective actions and other recommendations, including modifications to procedures, will be made and closed out under the direction of the Raw Material Supervisor, Plant Manager or WHSE Manager.

Details of all complaints, actions taken, and resolutions will be:

- Recorded in the complaints register and published monthly on the website;
- Tabled at the CCC meetings; and
- Included in the Annual Reviews.

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**Figure 6** Flow Chart for Complaints, Enquiries and Feedback Handling



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### 8.3 Dispute Resolution

Where a dispute arises, such as a complaint that cannot be resolved, the following actions will be undertaken.

Where the dispute involves a member of the public and the complaints procedures have not resulted in a resolution, the details of the dispute will be tabled at the next CCC meeting. The member of the public will be invited to attend the meeting as a guest, and offered the opportunity to share their issue with the CCC. If the CCC cannot reach a resolution, the matter will be referred to the Secretary.

Where the dispute is with another government authority, the matter will be referred to the Secretary.

### 8.4 External and government authority consultation

The National Workplace Health, Safety & Environmental Manager (or delegate) will be the main point of contact for external and/or government authorities regarding environmental issues. Additionally, the National Workplace Health, Safety & Environmental Manager has the responsibility to report the ongoing environmental performance of the development to government authorities (e.g. EPA, DPIE, DRG, NRAR or successors).

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## 8.5 Stakeholder and community communication

### 8.5.1 Community Communication Strategy

A community and stakeholder communication strategy has been developed and identifies opportunities for providing information and consulting with the community and stakeholders during the operational lifetime of the facility. The approach encourages the following methods of communication as outlined in Table 12 below:

**Table 12 Summary of Community Communication Methods**

Methods for informing the community	Application	When
Website;	Provides all relevant details in order to receive, handle, respond to complaints or queries;	Visible at all times
Phone number, email and postal address	Advertised on signage, website, letterbox drop and through the CCC. Provides opportunity for community and stakeholders to offer complaints, enquiries or feedback.	Monitored 24 hours and 7 days per week
Signage (at front of premises providing contact details);	Provides all relevant details (enquiry telephone number, email address postal address) in order to receive, handle, respond to complaints;	Visible at all times
Advertisements (in Local Media);	Keeps the local community informed about the operation and environmental performance of the development and about actions which may affect local residents.	As required
Letterbox drops;	Keeps the local community informed about the operation and environmental performance of the development and about actions which may affect local residents.	As required
Community Consultative Committee (CCC)	Keeps the local community and relevant agencies informed about the operation and environmental performance of the development; Opportunity to resolve any disputes that may arise during the course of the development;	As scheduled or required

### 8.5.2 Community Consultative Committee

PGH has established a Community Consultative Committee (CCC) for the facility in accordance with Schedule 5, Condition 6 of the CoA. This CCC will be operated in accordance with the *Guidelines for Establishing and Operating Community Consultative Committees for Mining Developments* (Appendix E).

The purpose of the CCC is to provide a forum for open discussion between representatives of the company, the community, local councils and key stakeholders on issues directly relating to the facility, including the facilities performance against the CoA. The CCC is able to discuss and assist the management team to resolve matters of environmental and social concern.

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The Committee shall comprise:

- An independent chairperson approved by the Secretary of the DPI&E;
- Three to five community representatives from the following:
  - Neighbouring landowners potentially impacted by the brickworks extension and quarry;
  - Bringelly Public School;
  - Bringelly Sports Club; or
  - Bringelly Seniors Group.
- An indigenous representative;
- Two representatives from Camden Council;
- Representative of local Bringelly village businesses; and
- Two or three company representatives, including the person with direct managerial responsibility for environmental management and a minute taker.

The CCC will determine the frequency of meetings, however the Secretary suggests that the committee meet at least quarterly in the first two years of the extension project and thereafter twice yearly.

Additional information is available on the following website  
<http://pghnswepa.pghbricks.com.au/>.



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## 9 EMERGENCIES

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All incidents and emergencies will be managed in accordance with section 8.1 and the Pollution Incident Response Management Plan (PIRMP, Appendix F) as required by Environment Protection Licence (EPL) No. 1808. The procedure provides information on:

- Types of incidents;
- Criteria for classification of environmental incidents;
- Processes for systematically responding to and managing emergency situations; and
- Processes and legal requirements (e.g. Acts, Regulations, EPL) for the reporting and notification of an environmental incident.

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## 10 REVIEW AND IMPROVEMENT

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### 10.1 Annual Review

By the end of September each year, management reviews are undertaken as part of the continual improvement process required by CoA Schedule 5, Condition 4.

The Annual Review will involve the executive management team. This review will be held every 12 months, will cover the financial year period, and will include a review of:

- The facility's activities (including rehabilitation) for the past year and consideration of the developments activities (including rehabilitation) planned for the next year;
- Descriptions of environmental management and mitigation measures, and their effectiveness;
- Consideration of monitoring, inspection and audit results;
- Comparison of results against statutory requirements, limits, performance measures, previous monitoring and relevant predictions;
- A summary of complaints and feedback, and the resulting actions undertaken;
- Identification of any non-compliances during the report period, and the resulting actions undertaken;
- Identify any trends in the monitoring data over the life of the development;
- Identify any discrepancies between the predicted and actual impacts of the development, and analyse the potential cause of any significant discrepancies;
- Describe what measures will be implemented over the current financial year to improve the environmental performance of the development;
- Annual quarry production data using a standard DRE form;
- Organisation changes; and
- Effectiveness of training and inductions.

The Annual Review will be submitted to the DPIE (in accordance with CoA Schedule 5, Condition 4), the DRE (in accordance with Condition 3 of ML1731), the Community Consultation Committee, and any other stakeholder that requests a copy.

### 10.2 Revision of Strategies, Plans and Programs

All strategies, plans and programs will be reviewed within 3 months of an:

- (a) Annual Review;
- (b) Incident report;
- (c) Audit report; and
- (d) Any modifications to the consent, licences or permits.

Where any review leads to revisions in any such document, then within 4 weeks of the review the revised document will be submitted for the approval of the Secretary, if required under clause 11.2 of this document.

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### 10.3 Environment Group Meetings

An environment group review is initiated by the National Workplace Health, Safety & Environmental Manager and includes relevant operational personnel. The group meet quarterly, or at other pre-determined periods, to review environmental management issues specific to the facility.

The environment group meetings include:

- A review of the aspects and impacts register, legal register and environmental induction;
- Consideration of monitoring, inspection and audit results;
- Consideration of incidents, complaints, non-compliance and any lessons learnt;
- Consideration of any new regulatory issues;
- A review of the effectiveness of erosion and sediment controls; and
- Consideration of changes in operational needs such as resourcing.

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## 11 DOCUMENTATION

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### 11.1 Environmental records

The Plant Manager is responsible for ensuring all environmental management documents are current and records are being maintained. Types of records include:

- Monitoring, inspection and compliance reports/records;
- Correspondence with public authorities;
- Induction and training records;
- Reports on environmental incidents, other environmental non-conformances, complaints and follow-up action;
- Community engagement information and CCC minutes; and
- Minutes of EMS and PGH environmental management system review meetings and evidence of any action taken.

All environmental management documents are subject to ongoing review and continual improvement.

### 11.2 Amendments to EMS & associated management plans

The National Workplace Health, Safety & Environmental Manager has the authority to approve or reject “minor amendments” to the EMS and associated management plans. In principle, “minor amendments” can be approved where the proposed changes:

1. Do not result in a material increase of the impacts of the project compared to the approved EMS; and
2. Are consistent with the CoA and other legislative requirements. Following

are examples of what may constitute a “minor amendment”:

- Formatting and editorial changes, errors, changes in descriptions or calculations; or
- “Like for like changes” to methodology or procedures that will not result in any increase to environmental impacts; or
- Minor changes to improve the efficacy and / or efficiency of procedures, provided the changes are consistent with relevant conditions of approval, licence conditions, permit condition and commitments made in the EA and Submissions Report.

All amendments will be submitted to the Secretary for approval.

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### 11.3 Document Control

PGH currently implements a document control procedure to control the flow of documents within and between stakeholders and contractors.

The procedure ensures that documentation is:

- Developed, reviewed and approved prior to issue;
- Issued for use;
- Controlled and stored for the legally required timeframe;
- Removed from use when superseded or obsolete; and
- Archived.

A register and distribution list will identify the current revision of particular documents or data.

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## APPENDIX A CONDITIONS OF APPROVAL



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## APPENDIX B ENVIRONMENT PROTECTION LICENCE



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## APPENDIX C MINING LEASE





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## APPENDIX D WATER APPROVAL AND LICENCE



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## APPENDIX E COMMUNITY CONSULTATION COMMITTEE GUIDELINE



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## APPENDIX F POLLUTION INCIDENT RESPONSE MANAGEMENT PLAN



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## APPENDIX G CRISIS MANAGEMENT POLICY



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## APPENDIX H COMPLAINTS, ENQUIRIES AND FEEDBACK CONTACT DETAILS

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## APPENDIX I STAKEHOLDER CONTACTS

