

3 December 2024

Department of Climate Change, Energy, the Environment and Water  
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Sent by email to: [Katrina.Corby@dcceew.gov.au](mailto:Katrina.Corby@dcceew.gov.au) ; [EPBCMonitoring@environment.gov.au](mailto:EPBCMonitoring@environment.gov.au)

**SUBJECT: REVIEW OF CABBAGE TREE ROAD SAND QUARRY – COMPLIANCE WITH  
COMMONWEALTH APPROVAL (EPBC 2016/7852)**

Dear Katrina,

This letter has been prepared for the Australian Government's Department of Climate Change, Energy, the Environment and Water (DCCEEW) (previously Department of the Environment and Energy) as a means to provide a review of compliance of the Newcastle Sand Quarry operations with the conditions of the Commonwealth Approval EPBC 2016/7852.

The approval permits the development and operation of a sand quarry on Cabbage Tree Road in Williamstown, within the Port Stephens LGA and approximately 30km north of Newcastle, NSW. Williamstown Sand Syndicate Pty Ltd (WSS) are the applicant and the owners of the quarry operator, Newcastle Sand.

This letter also serves as a notification to the Department of identified non-compliances with the approval in accordance with Condition 9 and provides additional details on the non-compliances per requirements of Condition 10 of the approval.

The attached report provides an assessment of the project compliance with EPBC 2016/7852 for the 2023/24 period, and details of identified non-compliances.

Yours sincerely,

*Elliott Laver*

Elliott Laver (Dec 3, 2024 14:36 GMT+11)

Elliott Laver

Quarry Manager

## Declaration of Accuracy

In making this declaration, I am aware that sections 490 and 491 of the Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) make it an offence in certain circumstances to knowingly provide false or misleading information or documents. The offence is punishable on conviction by imprisonment or a fine, or both. I declare that all the information and documentation supporting this compliance report is true and correct in every particular. I am authorised to bind the approval holder to this declaration and that I have no knowledge of that authorisation being revoked at the time of making this declaration.

Signed *Elliott Laver*  
Elliott Laver (Dec 3, 2024 14:36 GMT+11)

Full name (please print) Elliott Laver

Position (please print) Quarry Manager

Organisation (please print including ABN/ACN if applicable) 606820875

Date 3/12/2024

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# 2023/24 Compliance Report for Cabbage Tree Road Sand Quarry

## EPBC 2016/7852

14 August 2023 – 14 August 2024

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# 1. PURPOSE OF REPORT

This Annual Compliance Report has been prepared to satisfy the requirements of Condition 8 of the EPBC 2016-1785, Commonwealth Approval. Prepared in accordance with the 'Annual Compliance Report Guidelines, Commonwealth of Australia 2023'.

The date of commencement of the action was 14 August 2019, therefore this report provides an assessment of compliance against each of the conditions between the period of 14 August 2023 and 13 August 2024.

The key dates are provided below in **Table 1**, this report will also be published on the Newcastle Sand (Cabbage Tree Road San Quarry) website and provided to the provided to the Department of Climate Change, Energy, the Environment and Water (DCCEE) as required by Condition 8b.

Table 1 Key Dates of the EPBC Approval

Action	Key Date
Commonwealth Approval	12 December 2018
Commencement Date	14 August 2019
Expiry of Commonwealth Approval	31 December 2033

# 2. DESCRIPTION OF ACTIVITIES

## 2.1 PROJECT OVERVIEW

Williamstown Sand Syndicate Pty Ltd (WSS) was granted the following approvals to construct and operate a sand quarry at Cabbage Tree Road, Williamstown:

- Project Approval SSD-6125, issued by The Independent Planning Commission NSW on 9 May 2018.
- Project Approval EPBC 2016-7852, issued by the Department of the Environment and Energy on 12 December 2018.

Construction works were initiated on 14 August 2019 and focused on the construction of access roads and infrastructure. SSD-6125 has been modified on two occasions under Section 4.55 of the *Environmental Planning and Assessment Act 1979* (EP&A Act):

During the construction phase, Newcastle Sand were approached by Sibelco and Owens Illinois (OI) regarding the supply of specific sand for glass manufacturing. A request for 5000 tonnes of sand was made to evaluate the suitability of a new sand resource. Modification 1 was requested to facilitate the trial, as the formal intersection with the quarry had not been completed. Modification 1 was granted on 26 March 2020. The trial was completed in late March / early April.

Modification 2 was approved in March 2021 to permit the inclusion of a sand washing plant and ancillary equipment onsite. Commencement of extraction operations, with sand extraction in May 2020.

## **2.2 ACTIVITIES DURING THE REPORTING PERIOD**

Project activities that occurred during the reporting period (14 August 2023 to the 13 August 2024) are detailed below.

- Seed previously collected prior to clearing activities was sent to Tilligery Habitat for germination.
- Planting of this native tubestock was completed in October 2023.

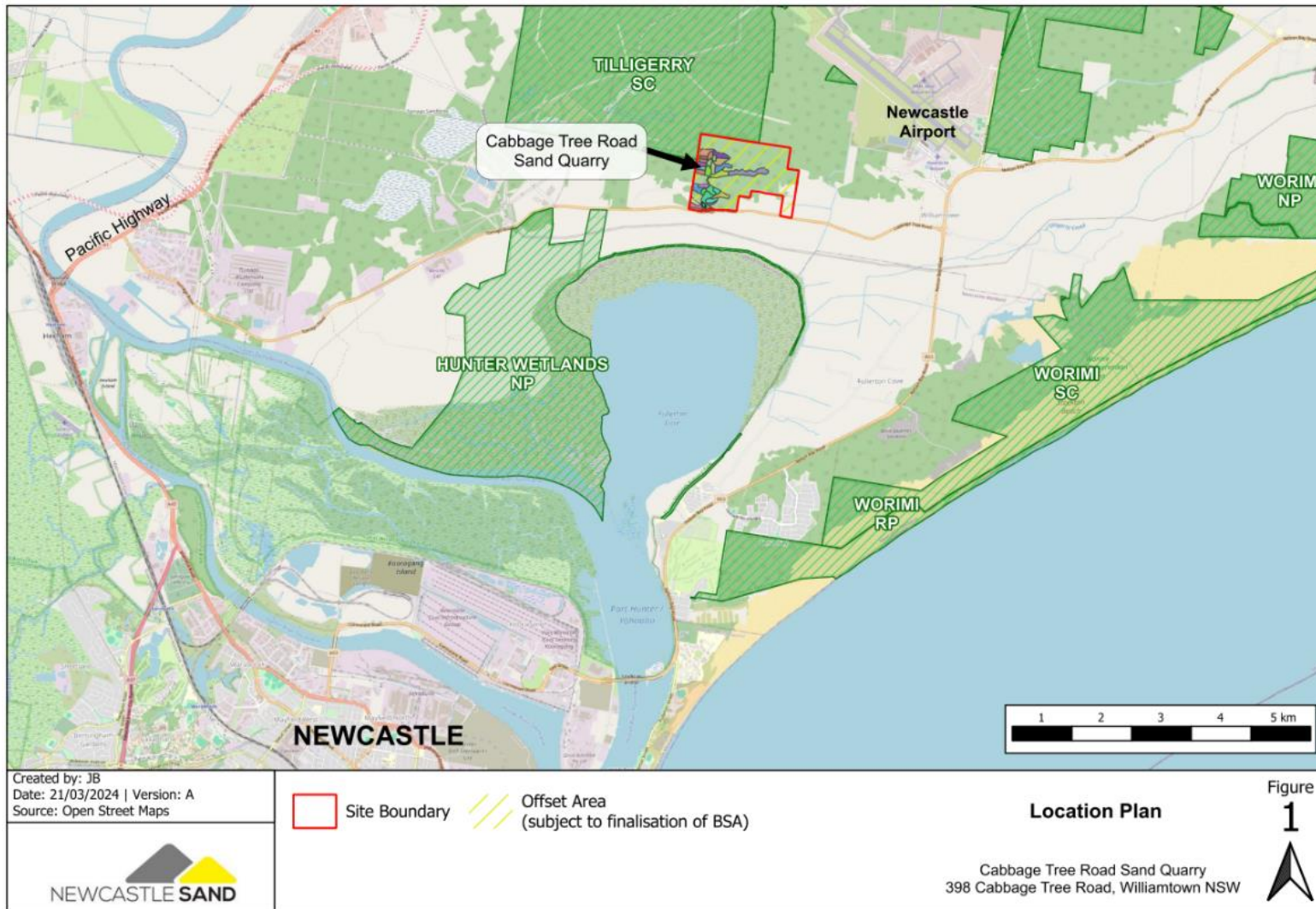


Figure 1 Location Plan

### 3. ASSESSMENT OF COMPLIANCE

The terms used to describe the level of compliance of the site are outlined in . These are in accordance with the requirements listed in Appendix 2 of the Independent Audit and Audit report Guidelines (Commonwealth Department of the Environment and Energy, 2019).

**Table 3** provides an assessment of the compliance of the project with the conditions of consent EPBC 2016/7852 from 14 August 2023 to 13 August 2024.

Table 2 Compliance assessment criteria (refer Table 3)

Abbreviation	Assessment	Criteria
Y	Yes	A rating of 'compliance' is given when the auditee has complied with a condition, element of a condition, or measure required by a management plan, report or program etc.
N	Non-compliance	A rating of 'non-compliance' is given when the auditee has not met a condition, element of a condition, or measure required by a management plan, report or program etc.
N/A	Not applicable	A rating of 'not applicable at the time of the audit' is given when the condition or element of a condition falls outside the scope of the audit e.g. if an activity has not yet commenced.
O	Observation	An 'observation' may be made about issues relevant to the protection of a matter of national environmental significance when the issue is not strictly related to compliance or non-compliance with a condition or element of a condition.

### 4. COMPLIANCE WITH APPROVAL CONDITIONS

In 2023/24, the Newcastle Sand Quarry demonstrated overall compliance to the conditions outlined in EPBC 2016/7852. Operational activities remained within approved disturbance limits, with robust biodiversity offset and rehabilitation programs continuing to mitigate impacts on protected habitats and species such as the Koala (*Phascolarctos cinereus*) and Grey-headed Flying-Fox (*Pteropus poliocephalus*).

General compliance with management plan requirements, including those for biodiversity, air quality, water, and noise monitoring and reporting, was maintained throughout the year. Updated management plans reflecting modification 3 adjustments were implemented. Monitoring results indicated that environmental impacts were minimal, with isolated exceedances promptly addressed through targeted mitigation measures.

Summary of non-compliances are outlined below:

- Condition 1a: Progress on biodiversity offsets and rehabilitation continued, but reporting of rehabilitation metrics required improvement.
- Condition 8a: The 2023/24 compliance report was published, but notification to the Department (Condition 8b) was delayed.
- Condition 8b: Notification of compliance report publication to the Department within five business days required to be completed by site.
- Condition 9: Although low risk, compliance with this condition in the reporting period is non-compliant. General administrative non-compliance with this condition.
- Condition 10: Late submission of incident details for water quality exceedances due to internal processing delays.
- Condition 11: The audit has not yet been conducted for the 2023/24 period, Newcastle Sand is in discussion in getting this completed with the Department.

Focus areas for the corrective actions is around biodiversity management and overall reporting, administrative delays and notifications. These issues, although low-risk, were mitigated through improvements to reporting systems, enhanced real-time monitoring processes, and administrative procedures. The project remains committed to maintaining compliance and aligning its practices with the objectives of the EPBC approval. Enhanced oversight and adaptive management strategies will be implemented in subsequent reporting periods to prevent recurrence of similar issues.



Table 3 EPBC 2016/7852 conditions, self-assessment of compliance and proposed nature and timing of corrective actions.

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA
<b>Part A – Conditions specific to the action</b>					
<b>1</b>	The person taking the action must:				
<b>1a</b>	Implement the following conditions identified in Schedule 3 of the State approval: condition 34 Biodiversity Offset Strategy, condition 35 Rehabilitation Objectives, condition 37 Biodiversity and Rehabilitation Management Plan and Appendix 6 Biodiversity Offset Strategy.	Progress on biodiversity offsets and rehabilitation continued, but reporting of rehabilitation metrics required improvement.	<b>N</b>	Enhance documentation of rehabilitation progress through regular internal reviews and updates.	Ongoing.
<b>1b</b>	Submit a copy of the Independent Environmental Audit report, identified in Schedule 5 condition 12 of the State approval, to the Department. Included with the report should be a response to any recommendations contained in the audit report and a timetable for the implementation of the recommendations as required.	The IEA was conducted and submitted in 2024 with all required responses and implementation timelines provided.	<b>Y</b>	Not required.	N/A.
<b>1c</b>	Notify the Department in writing of any proposed change to the conditions of the NSW Government approval for which conditions 1a – 1b apply, no later than 2 weeks after formally proposing a change or becoming aware of the NSW Government proposing a change.	No proposed changes to the NSW Government approval occurred in 2023/24.	<b>Y</b>	Not required.	Completed.

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA								
1d	Notify the Department in writing of any change to the NSW Government approval for which conditions 1a - 1b apply, within 2 weeks of a change being finalised.	No finalised changes to the NSW Government approval were made in 2023/24.	N/A	Not required.	N/A.								
2	<p>The person taking the action must not exceed the area of maximum disturbance, provided in Table 1, within the proposal location as per Maps 1-3, to protect the EPBC listed threatened species habitat and ecological communities.</p> <p><b>Table 1. Area of Maximum Distance</b></p> <table border="1"> <thead> <tr> <th>Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) listed threatened species and ecological communities</th> <th>Area of Maximum Disturbance</th> </tr> </thead> <tbody> <tr> <td>Potential habitat for Koala (<i>Phascolarctos cinereus</i>) (combined populations of Queensland, New South Wales and the Australian Capital Territory) - Vulnerable</td> <td>40.38 ha</td> </tr> <tr> <td>Potential foraging habitat for the Grey-headed Flying-fox (<i>Pteropus poliocephalus</i>) - Vulnerable</td> <td>40.38 ha</td> </tr> <tr> <td>Camfield's Stringybark (<i>Eucalyptus camfieldii</i>) - Vulnerable</td> <td>227 individuals</td> </tr> </tbody> </table>	Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) listed threatened species and ecological communities	Area of Maximum Disturbance	Potential habitat for Koala ( <i>Phascolarctos cinereus</i> ) (combined populations of Queensland, New South Wales and the Australian Capital Territory) - Vulnerable	40.38 ha	Potential foraging habitat for the Grey-headed Flying-fox ( <i>Pteropus poliocephalus</i> ) - Vulnerable	40.38 ha	Camfield's Stringybark ( <i>Eucalyptus camfieldii</i> ) - Vulnerable	227 individuals	<p>Operations remained within approved disturbance limits as verified through regular site inspections and monitoring of boundary markers.</p> <p>The Annual Review provides insight to the rehabilitation compliance occurring onsite in 2023/24 period found at: <a href="http://www.newcastlesand.com.au/annualreview">www.newcastlesand.com.au/annualreview</a></p> <p>Additional planting campaigns planned for 2024/2025 will ensure compliance with species replacement requirements for <i>Eucalyptus camfieldii</i> and <i>Eucalyptus parramattensis</i>.</p>	Y	Not required.	N/A.
Environment Protection and Biodiversity Conservation Act 1999 (Cth) (EPBC Act) listed threatened species and ecological communities	Area of Maximum Disturbance												
Potential habitat for Koala ( <i>Phascolarctos cinereus</i> ) (combined populations of Queensland, New South Wales and the Australian Capital Territory) - Vulnerable	40.38 ha												
Potential foraging habitat for the Grey-headed Flying-fox ( <i>Pteropus poliocephalus</i> ) - Vulnerable	40.38 ha												
Camfield's Stringybark ( <i>Eucalyptus camfieldii</i> ) - Vulnerable	227 individuals												

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA
	Earps' Gum ( <i>Eucalyptus parramattensis</i> subsp. <i>decadens</i> ) - Vulnerable	230 individuals			
<b>Part B – Standard Administrative conditions</b>					
3.	The approval holder must notify the Department in writing of the date of commencement of the action within 10 business days after the date of commencement of the action.	Commencement was notified in 2019; this condition was not applicable to subsequent years.	N/A	Not required.	N/A.
4.	If the commencement of the action does not occur within 5 years from the date of this approval, then the approval holder must not commence the action without the prior written agreement of the Minister.	Project commenced within the required timeframe, as construction began in August 2019, less than one year after the approval was granted in December 2018.	Y	Not required.	N/A.
5.	The approval holder must maintain accurate and complete compliance records.	Comprehensive records of compliance, including monitoring and operational data, were maintained..Available at <a href="http://www.newcastle.sand.com">www.newcastle.sand.com</a>	Y	Not required.	N/A.
6.	If the Department makes a request in writing, the approval holder must provide electronic copies of compliance records to the Department within the timeframe specified in the request.	Request for records in late 2024 provided to the Department.	Y	Not required.	N/A.
7.	The approval holder must:				
7a.	Submit plans electronically to the Department within two months of their approval by the Secretary, or nominee, of the Department of Planning and Environment;	Updated management plans reflecting proposed modification 3 approval were submitted.	Y	Not required.	N/A.

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA
7b.	Publish each plan on the website within two months of the date the plan is approved by the Secretary, or nominee, of the Department of Planning and Environment or the date a revised action management plan is submitted to the Secretary, or nominee, of the Department of Planning and Environment; and	Modification 3 related management plans were published on the website at <a href="http://www.newcastlesand.com/managementplans">www.newcastlesand.com/managementplans</a>	Y	Not required.	N/A.
7c.	Keep plans published on the website until the end date of this approval.	Plans remain published on the website and accessible to the public.	Y	Not required.	N/A.
8.	The approval holder must prepare a compliance report for each 12-month period following the date of commencement of the action, or as otherwise agreed to in writing by the Minister. The approval holder must:	The compliance report for the 2023/24 calendar year has been prepared.	N	Establish automated reminders for publication notifications to the Department to avoid delays.	Ongoing.
8a.	Publish each compliance report on the website within 60 business days following the relevant 12 month period;	The 2023/24 compliance report is published, but notification to the Department (Condition 8b) was delayed.	N	Establish automated reminders for publication notifications to the Department to avoid delays.	Ongoing
8b.	Notify the Department by email that a compliance report has been published on the website within five business days of the date of publication;	Notification for the 2023/24 compliance report publication was delayed due to oversight.	N	Notify and publish the required reporting on	Ongoing.

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA
				the website and regulatory authorities.	
8c.	Keep all compliance reports publicly available on the website until this approval expires;	The compliance reports remain accessible on the website, as required, with no interruptions to public availability.	Y	Not required.	N/A.
8d.	Exclude or redact sensitive ecological data from compliance reports published on the website; and	No sensitive ecological data was included in the 2023/24 compliance report; therefore, no exclusions or redactions were necessary.	N/A	Not required.	N/A.
8e.	Where any sensitive ecological data has been excluded from the version published, submit the full compliance report to the Department within 5 business days of publication.	No sensitive data was excluded, so no separate submission of a full report to the Department was required.	NA	Not required.	N/A.
9.	The approval holder must notify the Department in writing of any: incident; non-compliance with the conditions; or non-compliance with the commitments made in plans. The notification must be given as soon as practicable, and no later than two business days after becoming aware of the incident or non-compliance. The notification must specify: <ul style="list-style-type: none"> <li>a. the condition which is or may be in breach; and</li> <li>b. short description of the incident and/or non-compliance.</li> </ul>	Although low risk, compliance with this condition in the reporting period is non-compliant. General administrative non-compliance with this condition.	N	Formalise incident reporting processes to ensure timely and consistent notification of issues to the Department.	Ongoing.
10.	The approval holder must provide to the Department the details of any incident or non-compliance with the conditions or	Incident details related to water monitoring and reporting were submitted late due to internal processing delays.	N	Formalise incident reporting	Ongoing.

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA
	<p>commitments made in plans as soon as practicable and no later than 10 business days after becoming aware of the incident or non-compliance, specifying:</p> <ul style="list-style-type: none"> <li>a. any corrective action or investigation which the approval holder has already taken or intends to take in the immediate future;</li> <li>b. the potential impacts of the incident or non-compliance; and</li> <li>c. the method and timing of any remedial action that will be undertaken by the approval holder.</li> </ul>			processes to ensure timely and consistent notification of issues to the Department.	
11.	The approval holder must ensure that independent audits of compliance with the conditions are conducted for the 12-month period following the date of commencement of the action and for every subsequent 12-month period, or as otherwise requested in writing by the Minister.	<p>The first independent environmental audit for SSD-6125 was conducted in October 2021, covering the operational years of 2020 and 2021 in line with the EPBC requirements. The second Independent Environmental Audit was completed late 2024 and awaiting approval.</p> <p>12-monthly audits in between the IEA have not been completed.</p>	<b>N</b>	Conduct annual independent audits.	Immediately.
12.	<p>For each independent audit, the approval holder must:</p> <ul style="list-style-type: none"> <li>a. provide the name and qualifications of the independent auditor and the draft audit criteria to the Department;</li> <li>b. only commence the independent audit once the audit criteria have been</li> </ul>	<p>12a. Delay in submission of auditor details and criteria approval, leading to overall audit delays.</p> <p>The independent auditor's qualifications and draft audit criteria are being submitted for approved by the Department before the audit commencement. The audit will</p>	<b>N</b>	Establish earlier engagement with auditors to meet submission deadlines.	Every 3 years

Condition No.	Condition	Comment	Assessment of Compliance	Corrective Action (CA)	Proposed Timing of CA
	<p>approved in writing by the Department; and</p> <p>c. submit an audit report to the Department within the timeframe specified in the approved audit criteria.</p>	commence after receiving Department approval for the criteria.			
13.	The approval holder must publish the audit report on the website within 10 business days of receiving the Department's approval of the audit report and keep the audit report published on the website until the end date of this approval.	The audit report will be published on the website within 10 business days of Department approval.	NA	Not required.	N/A.
14.	Within 30 days after the completion of the action, the approval holder must notify the Department in writing and provide completion data.	The project action was ongoing in 2024, with no completion notification required.	NA	Not required.	N/A.

## 5. ACTIONS

Key actions taken during the second year of operation included:

- Developing management plans for biodiversity offset and rehabilitation in alignment with the approved consent conditions.
- Engaging with relevant stakeholders, including the Department of Planning and Environment, to ensure the smooth execution of construction activities.
- Preparing internal monitoring mechanisms to track adherence to environmental and compliance obligations.
- Improved regulatory and website compliance reporting.

## 6. MONITORING

Baseline monitoring programs were initiated in 2019 to establish key environmental metrics for the site. Monitoring activities in 2023/24 were conducted in alignment with the EPBC 2016/7852 approval conditions SSD-6125 conditions and EPL 21264 conditions, focusing on data collection, operational impacts, monitoring and ongoing compliance with overall environmental requirements. Below is an overview of the monitoring outcomes for key environmental aspects during the year.

Progressive revegetation efforts have focused on incorporating local native species critical to habitat restoration, with Camfield's Stringybark (*Eucalyptus camfieldii*) observed within the rehabilitation blocks, indicating successful early stages of regeneration. Habitat stability has been further supported by woody debris and brush matting practices, with no new disturbances reported beyond the approved areas. Additional planting campaigns scheduled for 2024/2025 will address species replacement requirements for Camfield's Stringybark (*Eucalyptus camfieldii*) and Earps' Gum (*Eucalyptus parramattensis*), ensuring continued compliance with rehabilitation objectives.

The biodiversity offset strategy outlined in Condition 1a was implemented, with monitoring programs targeting the following:

### *Offset Areas and Nest Boxes*

- Offset planting programs were completed in designated areas, meeting biodiversity targets for Koala (*Phascolarctos cinereus*) and Grey-headed Flying-Fox (*Pteropus poliocephalus*) habitats.
- Nest box inspections showed high occupancy rates, indicating successful integration into local ecosystems.

### *Rehabilitation Activities*

- Monitoring confirmed continued vegetation growth in rehabilitated areas, with native species thriving.



## 7. INDEPENDENT ENVIRONMENTAL ADUIT

### *Independent Environmental Audit:*

- The Independent Environmental Audit was conducted in October 2021 and October 2024, fulfilling the requirements of the Development Consent SSD 6125.
- The audit covered compliance with all approval conditions, including environmental management and monitoring obligations.
- Findings indicated an overall level of compliance, with no high-risk non-compliances identified. However, administrative non-compliances were noted and require improvement.

## 8. CONCLUSION

The modifications from 2019 to 2024 reflect the Newcastle Sand Quarry's commitment to improving operational efficiency while maintaining compliance with EPBC conditions. Enhanced monitoring and adaptive management practices ensured that these changes were implemented without adverse environmental impacts. Moving forward, strengthened administrative processes will address delays in management plan updates and publication.

Isolated challenges, such as data gaps in surface water monitoring and minor dust exceedances during adverse weather, were mitigated through corrective actions, including equipment upgrades and enhanced dust management practices. Maintaining and improving biodiversity and rehabilitation progress remained a priority, with steps taken to address delays in nest box installation and improve documentation.

The monitoring activities conducted in 2024 demonstrated overall compliance with EPBC approval conditions and effective environmental management practices. The data collected during the year will inform adaptive management strategies to ensure continued compliance and protection of environmental values.

The rehabilitation efforts at the Cabbage Tree Rd Sand Quarry align broadly with EPBC Approval 2016/7852 conditions. While progress has been made, further corrective actions, particularly in establishing midstorey and overstorey vegetation, are required to achieve full compliance with performance criteria. Regular monitoring and adaptive management are critical aspects of meeting biodiversity and rehabilitation objectives.

## 9. REFERENCES

Department of Climate Change, Energy, the Environment and Water, 2023. *Annual Compliance Report Guidelines*. Canberra: Commonwealth of Australia. Available at: [dceew.gov.au](https://dceew.gov.au) [Accessed 2 December 2024].

Wedgetail Project Consulting Pty Ltd, 2024. *Cabbage Tree Rd Sand Quarry: 2023 Rehabilitation Monitoring Report*. Prepared for Newcastle Sand Pty Ltd, 22 March 2024.






# AnnualComplianceReport\_EPBC2016-7852\_2023-24

Final Audit Report

2024-12-03

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