

## Cudgen Lakes Sand Quarry Independent Environmental Audit 2025 Response and Action Plan

11 March 2026

The 2025 Independent Environmental Audit was completed by James Hart Consulting and included a total of 20 recommendations relating to a total of 15 non-compliances with Project Approval MP05\_0103B and 3 non-compliances with EPL12385 across the 3-year audit period (2022 to 2025). The majority of these non-compliances had been self-reported throughout the audit period. Of the 20 recommendations provided the audit report confirms that no further actions are required for nine of these, having been adequately addressed prior to the conduct of the audit. A further five recommendations were addressed and completed following the audit inspection and prior to the completion of the audit report.

Whilst none of the non-compliances relate to matters resulting in environmental or community impacts, Gales-Kingscliff recognises the importance of maintaining compliance with all requirements and is committed to remaining proactive in its management approach.

A summary of the audit recommendations, Gales-Kingscliff's action / response, and proposed timing / status is provided as follows. An updated status will be provided annually as part of the Annual Review process.

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No.	Audit Recommendation	Action / Response	Proposed Timing / Status
NC-01	It is recommended that all non-compliances identified are addressed and closed out. Consider implementing a process to track compliance requirements and status.	Compliance requirements and status to continue to be tracked internally and reported through the Annual Review process. This process was in place throughout the audit period and will continue to be implemented.	Annually as part of the Annual Review. <b>Status: Ongoing</b>
NC-02	Gales-Kingscliff have had talks with the sampling contractor and clarified requirements for when sampling should be undertaken. Subsequently, sampling has been undertaken in accordance with the AQMP. No further action required	No further action required.	<b>Status: Complete</b>
NC-03	Gales-Kingscliff have had talks with the sampling contractor and clarified requirements for when sampling should be undertaken. Subsequently, sampling has been undertaken in accordance with the AQMP. In accordance with the updated and approved AQMP, dust deposition monitoring is no longer required to be conducted when only wet processing operations are occurring. No further action required.	No further action required.	<b>Status: Complete</b>
NC-04	This issue was raised as a non-compliance upon becoming aware of the issue in January 2025. A process has been implemented to ensure sampling requirements are communicated to the sampling laboratory. No further action required.	No further action required.	<b>Status: Complete</b>

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NC-05	<p>This issue was raised as a non-compliance upon becoming aware of the issue during review of data in preparation of the 2024 Annual Review.</p> <p>A process has been implemented to ensure sampling results are reviewed as they are received to identify any exceedances.</p> <p>No further action required.</p>	No further action required.	<b>Status: Complete</b>
NC-06	<p>This issue had been previously identified (2023-2024 Annual Review).</p> <p>Updated SWMP clarifies that criteria for dissolved oxygen is applicable only for surface samples during periods when dredge is not operating.</p> <p>No further action required.</p>	No further action required.	<b>Status: Complete</b>
NC-07	<p>The site has installed a system to pump water from the southern dredge pond to the northern dredge pond to reduce the risk of drawdown in the northern bund and hence oxidation of ASS material. Subsequent groundwater results have been compliant with groundwater quality criteria.</p> <p>No further action required.</p>	No further action required.	<b>Status: Complete</b>
NC-08	It was reported that MB10 had been replaced in December 2025. Sampling of the replacement bore should be included in the next sampling event.	A nested bore (one shallow and one deep) was installed during December 2025 to replace the damaged MB10 (which initially only included one deep bore). Sample collection re-commenced 17 December and will continue in accordance with the approved SWMP.	<b>Status: Complete</b>
NC-09	<p>Noted that the updated SWMP Approved in September 2025 only requires levels to be monitored before commencing dredging.</p> <p>No further Action required.</p>	No further action required.	<b>Status: Complete</b>
NC-10	The Rehabilitation Bond should be lodged with DPHI.	Gales-Kingscliff have completed all required actions with NAB for the establishment of the updated bank guarantee. Finalisation remains an administrative function between NAB and DPHI. Gales will continue to follow up to confirm establishment is completed.	Ongoing follow up until establishment completed. <b>Status: In Progress</b>
NC-11	Gales-Kingscliff should ensure that the Rehabilitation bonds is reviewed, and if required, an updated bond be lodged with the Department within 3 months of the completion of this Independent Environmental Audit.	Gales-Kingscliff will complete a review of the Rehabilitation Management Plan and Rehabilitation Bond within 3 months of this Independent Environmental Audit.	By 11 June 2026 <b>Status: To be commenced</b>
NC-12	Update the site induction to include a section detailing site cultural heritage information and requirements.	The site induction was updated to include information regarding cultural heritage requirements.	<b>Status: Complete</b>
		Tweed Byron Local Aboriginal Council undertook a site induction / refresher course for all staff on 5 February 2026.	<b>Status: Complete</b>

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NC-13	Gales-Kingscliff should ensure that all requirements of the approved management plans are implemented until approval of an updated plan.	The non-compliances with the approved management plans was not intentional. Gales-Kingscliff reconfirms its commitment to comply with all of its requirements including the approved management plans. Compliance with the approved management plans will continue to be reported through the Annual Reviews.	Annually as part of the Annual Review. <b>Status: Ongoing</b>
NC-14	It is noted that a process has been implemented (verified for 2024 and 2025 Annual Reviews) to formally notify the Secretary of the outcomes arising from review of the strategies, plans, and programs required under this Consent in accordance with Schedule 5, Condition 4. The outcomes of the review should be submitted to the Secretary for approval. No further action required.	No further action required.	<b>Status: Complete</b>
NC-15	Gales-Kingscliff has implemented to review monitoring data upon receipt of information to identify exceedances. Implementation of the process during 2025 was demonstrated. No further action required.	No further action required.	<b>Status: Complete</b>
NC-16	Gales-Kingscliff should ensure that incident reports are provided to the Secretary and any relevant agencies within 7 days of the date of the incident.	This non-compliance was acknowledged and self-reported by Gales-Kingscliff in 2024. Since that time Gales-Kingscliff has undertaken to complete incident notification and reporting as soon as practicable and within the required timeframes.	<b>Status: Complete</b>
NC-17	Gales-Kingscliff should implement a process for maintaining and regularly Updating the website to include all required information.	Gales-Kingscliff will continue to review and update its website on a monthly basis. It is noted that not all monitoring data is collected on a monthly basis and laboratory processing times may result in data not being published the same month as sample collection. All monitoring data will also continue to be provided through the Annual Reviews (which are also published on the website).	Review monthly and close out following 12 months. <b>Status: Ongoing and review following 12 months.</b>
NC-18	Signs should be installed to clearly identify each Dredge Pond and Sediment Dam and discharge point.	Whilst the EPL discharge points are identified on site maps/figures, signs identifying the EPL discharge points were also installed on 20 February 2026.	<b>Status: Complete</b>
NC-19	The site rainfall gauge should be checked at the same time each day and a record of the rainfall for the previous 24 hours documented.	A new weather station was installed on site 8/1/2026 which automatically records daily rainfall.	<b>Status: Complete</b>
NC-20	Gales-Kingscliff should implement the weed control program as documented in Section 3.3.7 of the Rehabilitation Management Plan and maintain records.	Confirmation of weed inspections will be recorded through the monthly inspection checklist together with the details of any controls required. A summary of any weed control undertaken will be reported within the Annual Review.	Recorded monthly and reported annually. <b>Status: Ongoing</b>