

ENVIRONMENTAL MANAGEMENT PROGRAM

[Midland Brick Pty Ltd]

ACN - 635 664 710

[CLAY EXCAVATION]

[LOTS 42 & 43 APPLE STREET, UPPER SWAN]

Rev F	Reissued to DWER	10 February 2022	C Sinclair	CB
Rev E	Reissued to DWER	16 July 2021	CB	DV
Rev D	Issued to DWER	25 June 2021	ND, CB	DV
Rev C	Issued to DEC	18 Oct 2006	K Bennetts	A Donegan
Rev B	Draft to Client	11 Oct 2006	K Bennetts	S Rolls
Rev A	Issued to EPA	Apr 1998	BBG	MBC
Rev	Status	Date	Prepared By	Checked By

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1.0 INTRODUCTION

This Environmental Management Program (EMP) describes the environmental management activities and control measures that have occurred and will continue to be implemented to avoid or minimise environmental impacts at Lots 42 and 43 Apple Street, Upper Swan, and nearby sensitive receptors.

An EMP incorporating a Drainage Management Plan is required under Ministerial Statement 657 which regulates clay extraction at the location (Appendix 1). The site is also regulated under an Excavation License from the City of Swan.

Previous versions of this EMP were submitted to the Environmental Protection Authority (EPA) in 1998 and the Department of Conservation in 2006 and are attached as Appendix 2. No significant changes to the scope of operational control measures have occurred since 1998. In 2017 however, changes to the originally proposed rehabilitation strategy were approved by the EPA to return the landscape to pre-excavation levels.

This updated EMP has been produced in response to an audit by the Department of Water and Environmental Regulation (DWER) in March 2021 and due to a change in control of the ownership of the Proponent in April 2021.

A change of Proponent from Boral Bricks Western Australia Pty Ltd to Capitary No.3 Pty Ltd (Capitary) occurred in October 2020. Capitary was acquired by BGC (Australia) Pty Ltd (BGC) in April 2021. Capitary was renamed Midland Brick Pty Ltd in July 2021. The current landowner is Stargaze Asset P/L.

The boundaries of Lot 42 and 43 today were reconfigured in 2003 from Lots 40 and 41 which had been renumbered from Lots 21 and 22 established in 1981. All lot configurations comprise the same land component totaling approximately 16.6 ha.

Clay excavation at this location is limited to campaigns which run for two to six weeks between the months of November and May. This is expected to continue until 2027.

Midland Brick Pty Ltd and its predecessors have been extracting clay from the property for over 15 years.

2.0 OVERALL OBJECTIVES AND CORPORATE ENVIRONMENTAL STATEMENT

2.1 Objectives

The primary objective of the Environmental Management Program (EMP) is the protection of the habitat of the endangered Western Swamp Tortoise (*Pseudemydura umbrina*) at the Ellen Brook Nature Reserve (EBNR).

To achieve this objective, the EMP addresses:

- Management of excavation procedures (Excavation Plan);
- Management of drainage waters (Drainage Management Plan); and
- Management and protection of groundwater resources (Groundwater Protection Plan).

Other objectives of the EMP relate to the management of local environmental and social impacts and include:

- Management of noise, dust, and potential amenity impacts.
- Management for community health and safety; and
- Rehabilitation of the site.

Subsequent sections of this EMP provide details for each of the elements listed above.

2.2 Corporate Environmental Statement

In addition to the objectives listed above, Midland Brick provides the following statements as a reflection of its corporate position in relation to this EMP and the protection of the EBNR and the Western Swamp Tortoise.

Midland Brick is a wholly owned subsidiary of BGC and is committed to managing its operations to ensure that its environmental impact is negligible. This will be achieved by:

- Complying with all commitments contained within Ministerial Statement No. 657, this EMP, Excavation License DA-3/2011 and BGC's Environmental Policy (Appendix 3);
- Maintaining an ongoing educational program to ensure that all employees involved with this resource project are aware of the specific environmental issues and the Company's commitment to protecting this sensitive region;
- Utilising Company-owned plant and employees to carry out all facets of the resource extraction;
- Fully implementing the environmental management program, and any identified risk or circumstance which has the potential to deleteriously affect the environment will be reported to the relevant authorities as soon as practicable.

Coordination and onsite supervision will be provided by the Quarry Manager. Ultimate responsibility for the implementation of all aspects of the EMP rests with Midland Brick Pty Ltd.

3.0 EXCAVATION PLAN

3.1 Objectives

To implement a quarrying strategy that will minimise the total area of disturbance and allow effective water management and minimisation of potential offsite noise, dust, and impacts to visual amenity from the quarrying operation.

3.2 Buffer Zone

Midland Brick will maintain a 100-meter no-quarrying buffer zone between clay extraction activities and the southern boundary of the EBNR to protect the tortoise habitat within the EBNR (Bulletin 610, Assessment No. 121). The buffer zone will remain in place until if and when it is demonstrated through approved trial clay excavations and associated monitoring that the existing tortoise habitat and EBNR are not at risk.

Buffer areas between the excavation area and road reserves (40 m buffer) and other lot boundaries (20 m, excluding the common boundary between Lots 42 and 43) will also be maintained.

3.3 Quarrying Strategy

3.3.1 Background

Clay excavation at Lots 42 and 43 has been designed to be progressively developed and rehabilitated in four distinct cells, commencing in the south-east, and graduating north-west (Figure 2). The first cell in the south-east corner was established to retain the maximum buffer to the EBNR during the initial trial mining and monitoring phase of the project.

During the earthworks program (topsoil and overburden removal), approximately 0.5 ha of the resource is exposed at any one time to reduce the likelihood of disturbance to nearby sensitive receptors. Excavation occurs to a maximum depth of approximately 7 m below the ground surface, i.e., above the water table.



Figure 1 Site Location - Apple Street in May 2021

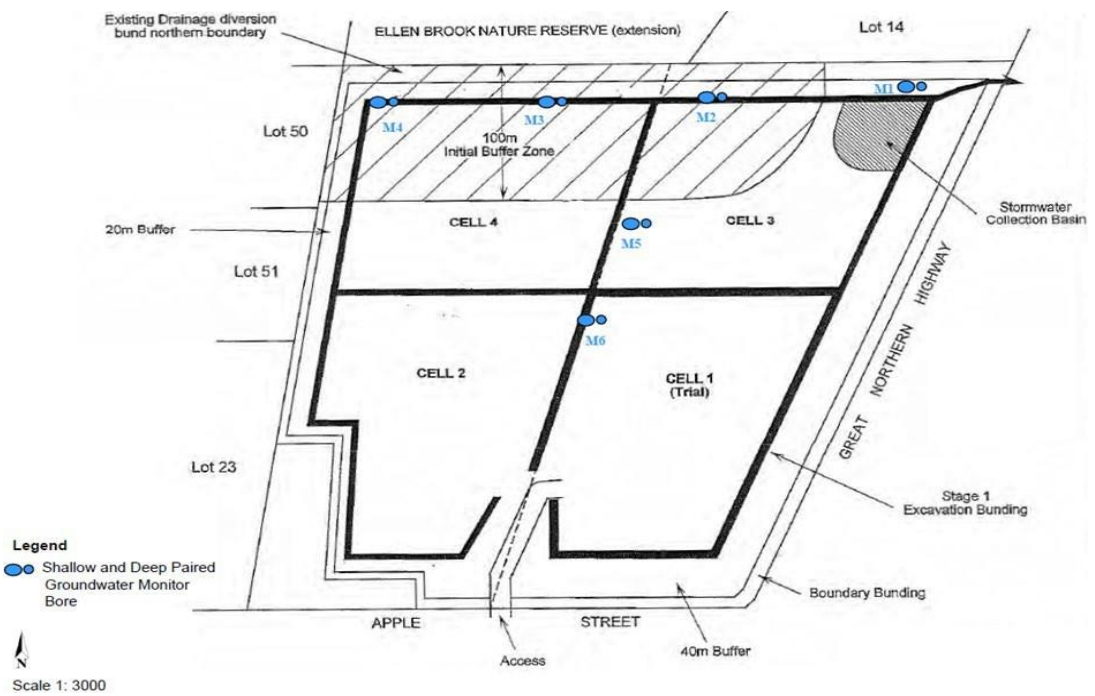


Figure 2 Original Excavation Plan (RPS BGG2006b)

3.3.2 The Clay Resource

Table I summarises data collected from 45 drill holes completed in a grid pattern over the site.

Table I Clay Resource Data

Cell No.	Average Surface RL (m)	Average Overburden Depth (m)	Average Clay Depth (m)	Average Depth of Excavation (m,RL)
1	18.5	3.8	3.0	6.8, RL 11.7
2	19.0	4.1	2.8	6.9, RL 12.1
3	18.0	2.7	3.0	5.7, RL 12.3
4	18.5	3.1	3.5	6.6, RL 11.9

Table I demonstrates that the average thickness of the clay resource is ~3.1 m. and is covered by an average of ~3.4 m of overburden. The average depth of the excavation is 6.5 m (and a maximum of 6.9 m, in Cell 2). The depth of the proposed excavation in Cell 4, closest to the EBNR boundary, is 6.6 m. A "deep" bore located midway along the eastern boundary of Lot 51 (adjacent to the site) has consistently recorded the depth to groundwater as between 7.13 m and 7.73 m below ground level. Additional groundwater information has been collected following the installation and monthly monitoring of six deep and shallow monitoring bores (see Section 5.2 for details) as part of the implementation of the Groundwater Protection Plan (Section 5.0).

3.3.3 Timing

Seasonal clay extraction works are currently in operation and are expected to continue for up to another six years (2027) but are highly dependent upon market demand.

Clay will continue to be extracted during dry weather between the months of November and May. Consumption predictions indicated that ~40 loads of clay would be excavated and transported from the site over about 50 days per year during the excavation season for the duration of the project.

Pit and road transport activity will continue to occur between 7:00 am to 5:00 pm from Monday to Friday and between 7:00 am to 1:30 pm on Saturday. No activity will be undertaken on Sunday. This is consistent with the conditions of the current Extractive Industries licence for lot 43.

3.3.4 Excavation Plan

The initial excavation plan for the site comprised of four discrete cells, a 100m initial buffer zone to the EBNR and a vehicle access road to Apple Street (Figure 2). Since each cell was required for excavation, it has been isolated from the balance of the property by earth bunds to ensure drainage water is retained within the active extraction areas.

Excavations are near completion in the southern section of the site and are progressing in line with the staging plan provided in earlier versions of the EMP towards the northern cells. Cells 1, 2, and 3 are complete. Cell 4 is the current and final excavation cell and has been excavated from the western boundary since the summer of 2018/19.

The initial bund around Cell 1 was constructed into a 1.5m – 2m high embankment around its perimeter. All topsoil, which varies in depth between 60-150mm within the cell, was accommodated within the bund, therefore eliminating the need for stockpiling at the site.

Trees and shrubs were planted on the embankments which face roadways. i.e., the eastern and southern faces.

The bunding on the sides of each cell is multi-functional, serving the following purposes:

- To significantly reduce any potential for noise and dust export from the site;
- To provide a visual screen of the excavation to residents and nearby road users; and
- To catch and divert all water from operational areas into the dams formed by excavation, thereby avoiding discharge of turbid water to drainage lines outside of the site.

The northern boundary of the site has an existing bund approximately 1 meter high. It was formed as part of the surface drainage plan for the area.

Following the above preparatory works, the clay formation was removed from the pre- stripped area by a hydraulic excavator and loaded directly into trucks for transport to the brick manufacturing plant.

A strip-mining method is employed to directly deposit overburden into the void created by clay excavation, thus removing the need to build stockpiles on the property. The remaining cells have been developed in sequence using the same mining methods and extending the bund walls and vegetation cover.

The total area to be disturbed is approximately 11.0 ha. As the resource in each cell is exhausted, the area will be rehabilitated as detailed in Section 7.0.

4.0 DRAINAGE MANAGEMENT PLAN

4.1 Objectives

To ensure the retention of turbid water from areas disturbed during excavation, within the exhausted clay pits during each excavation stage, and to monitor drainage water quality which will enable the success of drainage management to be confirmed or remedial action to be instigated where necessary. It is required that no pit water is to leave site.

4.2 Run-Off Management

4.2.1 Basis

In accordance with Conditions for the project set by the Minister for the Environment, all drainage waters from the south-western side of the Great Northern Highway were diverted from entering any of the fenced tortoise habitat enclosures at the EBNR prior to commencement of any quarrying activities.

All turbid drainage waters generated from the operational areas will continue to be detained on site for the life of the quarry.

4.2.2 Methodology

The following management strategies are implemented to ensure the onsite containment of turbid waters from operational areas;

- The perimeter of the site is bunded to contain any sheet flow within the site boundaries, except for a single pipe in the north-east corner and the front gate (Figure 2);
- All diffuse stormwater was originally detained in a settling/compensation basin at the north-east corner prior to discharge into the highway reserve drain (if necessary), to minimise the potential of silt transport. The highway reserve drain is independent of the EBNR;
- Subsequently, excavation pits created during each excavation cell (Stage 1, 2, 3, and 4) have been utilised for containment of turbid run-off within the bund system;
- Run-off from the disturbed ground adjacent to the pits has been diverted into the pits by the strategic formation of the surrounding earth bunds (and spoon-drains if necessary);
- To avoid the necessity for dewatering of drainage which collects in the pits, prior to excavation during subsequent campaigns, the pits created in each cell have been left as a discrete cell until rehabilitated;
- Water collected in pits has been lost through evaporation over the summer months and used for dust suppression.
- In the event that dewatering of collected drainage is necessary, it will either be pumped at low volumes for lateral dispersion onto the undisturbed ground for disposal via evaporation or carted offsite for dust suppression at Stargazes property as Lot 5 Walyunga Road, Bullsbrook.

Upon completion of decommissioning and rehabilitation, the site will slope from the northern-eastern corner to the south-western corner at a slope of 0.2% across the site (away from the EBNR). It is envisaged that a stormwater collection basin shall be developed at the southern-western portion of the property in order to collect future stormwater across the property and maintain the commitment to not allow any surface water to leave the property. This will be the responsibility of the landowner.

4.3 Monitoring and Remedial Action

4.3.1 Monitoring

The objective of monitoring is to ensure the success of turbid run-off containment. Monitoring of drainage has continued since the initial drainage diversion was completed. Due to the locality of this site, the quarry manager is able to perform regular monitoring of bunding and maintains inspection checklists. Extra checks are conducted as necessary in the event of a large storm.

4.3.2 Remedial Action

Remedial action will be dependent on the nature and extent of the identified problem and may include repairs to perimeter bunds and diversion of additional run-off into the clay pit for containment.

The quarry manager will ensure there are no breaches to perimeter bunding and in the event of a breach, will enforce the necessary measures to repair the issue as soon as practicable.

It should be noted that as 'ground-disturbing activity will only occur during the drier months of the year, and as most rainfall would be expected to occur when the operation is dormant. Turbidity will not be as excessive as one would expect if machinery were operating, or stock were on the site. Therefore, with the exception of the excavation area and internal access route. The remainder of drainage from the site is anticipated to be relatively "clean" water.

4.4 Reporting

If remedial action is considered necessary, the DWER's EPA Services will be advised at the time.

5.0 GROUNDWATER PROTECTION PLAN

5.1 Objectives

The primary objective of the Groundwater Protection Plan is to protect the EBNR from hydrological changes due to excavation, and to prevent pollution of the underlying groundwater systems (Guildford and Leederville aquifers) from agents such as fuel and oil spillages

5.2 Groundwater level monitoring

The Proponent has previously supplied evidence to the EPA that the EBNR is not hydrologically linked to the clay deposit on Lots 42 and 43. The EPA has concluded that excavation of clay on the site is most unlikely to interfere with the groundwater regime in the vicinity of the EBNR (EPA Bulletin No 614 1992b), although nonetheless, clay excavation from the site was to commence with a trial mining phase.

The Proponent originally monitored groundwater levels using four shallow (4 m) monitoring bores installed within the site in November 1989, and one deep bore already in existence on the property. Two bores located on the western side of former Lot 14 (now part of the EBNR) were also monitored. Measurements from the deep bore midway along the eastern boundary of the adjacent Lot 51 indicated that the deeper water table was located in excess of 7 m below ground level. Shallower, perched groundwater occurred at depths generally between 2 and 4 m below the surface in winter. Bores in the west of the site were often dry during winter, indicating no water within 4 m of the surface.

Prior to the commencement of site works six pairs of shallow (4 m) and deep (10 m) monitor bores were installed at 50 m intervals between the trial excavation pit and the EBNR, and along the boundary of the EBNR within Lot 43, to assess the effects of excavation on any perched groundwater (Figure 2). Of the six original monitoring bores, two (M1 and M6) have become inoperable.

Groundwater monitoring over 20+ years has demonstrated that there is no hydrological connection to the Ellen Brook Nature Reserve (EBNR) on which the risk and associated monitoring was originally premised. Monitoring originally commenced with four bores, increased to six and through passage of time, has regressed back to four bores (M1 and M6 now inoperable). The dispersion of remaining monitoring bores and 20+ years of longitudinal data supports ongoing monitoring with four bores will remain sufficient to manage the very low risk of impact to the EBN.

Groundwater levels in the bores will continue to be monitored on a monthly basis, reported to the Proponent on an annual basis and reported to the EPA on a biennial basis.

5.3 Groundwater protection and pollution control

The following measures will be implemented as part of the Groundwater Protection and Pollution Control strategy:

- Clay will not be excavated below the water table;
- Groundwater resources will be protected from potential hydrocarbon contamination;
- Only the excavation machinery (dozer and hydraulic excavator) will be refueled onsite. The trucks and water cart will be refueled elsewhere;
- Onsite refueling will be conducted via a fuel truck which only visits the site for the duration of refueling. The truck is fitted with vacuum extraction equipment that can recover wastes, if necessary, to be returned to Midland for disposal;
- No fuel or lubricants will be stored onsite;
- Machinery will not be left on site in the period between excavation campaigns;
- In the unlikely event that a substantial spillage occurs, the contaminated sediments will be

- excavated and removed from the site to an approved disposal location; and
- Regular groundwater quality monitoring will be conducted, compared against relevant water quality guidelines, and reported to the EPA on a biennial basis.

Groundwater quality monitoring has historically been completed during the wetter months of between August and October. The monitoring and sampling methodology follows the AS/NZS 5667.1:1998 Water Quality Sampling Standards. The samples are analysed for selected water quality parameters recommended by DWER, including pH, total suspended solids, electrical conductivity, salinity, colour, turbidity, total manganese, and total iron).

Groundwater monitoring results have shown slightly acidic to slightly alkaline pH levels, marginal salinity, and elevated iron levels. There have been no longitudinal changes in average groundwater quality parameters since testing commenced.

6.0 MANAGEMENT OF POTENTIAL SOCIAL IMPACTS

6.1 Objectives

Midland Brick will continue to operate the clay quarry:

- within regulated noise and dust limits to ensure minimal inconvenience to the local community; and
- to ensure that community health and safety standards are maintained in terms of such factors as pit safety and mosquito breeding potential.

6.2 Noise and Dust

6.2.1 Controls

As previously noted, haulage truck operations will continue to be restricted to between the hours of 7:00 am and 5:00 pm Monday to Friday and between 7:00 am and 1:30 pm on Saturday. No activity will be undertaken on Sunday. This is consistent with the conditions of the current Extractive Industries licence for lot 43.

The access road from Apple Street has been sealed for a distance of 50 m, and access tracks within site are watered to reduce potential dust generation. Whilst the site is operational, the quarry manager or his delegate will conduct daily checks to ensure that the watering regime is rigidly adhered to and dust generation is minimized. When the site is not operational, the checks will be random.

The 1.5 m high site perimeter bund and 3 m high bunds formed to both roadways significantly reduce the potential for the offsite export of both dust and noise emissions. These bunds ensure that noise is significantly attenuated, with the exception of haulage vehicles entering and exiting the site. In addition, a 10m wide corridor of trees has been planted along both the Apple Street and Great Northern Highway frontages to attenuate noise and minimize visual impacts of the site.

6.2.2 Complaints Procedure

Onsite personnel are advised to report all complaints immediately, including the name and contact details of the complainant and the nature of the complaint, to the Quarry Manager at Head Office. A complaints record will continue to be maintained by the Proponent.

In the event that a complaint is received, the matter will be investigated, and the complainant advised of the reasons for the perceived nuisance and the remedial action (if necessary) to prevent a re-occurrence of the problem.

Every endeavor will be undertaken to respond to complaints as soon as possible.

6.2.3 Inter-Company Liaison

The potential for cumulative impacts such as noise and dust and appropriate response and management is addressed through long term inter-company liaison with the landowner and adjacent neighbor Austral. Attempts will continue to be made to coordinate where possible. The effectiveness of this liaison method has been demonstrated through the successful design and implementation of the surface water drainage diversion network and no community complaints, ever.

6.3 Community Health and Safety

Earlier versions of this EMP committed to liaising with a Health Surveyor from the Shire of Swan prior to creation of amenity lakes as part of the rehabilitation program to minimise or avoid the creation of mosquito breeding habitat. The Proponent has since agreed to bestowing remediation and rehabilitation to the landowner Stargaze, based on detail provided in the Final Decommissioning and Closure Plan, approved by the EPA in 2017. The Final Decommissioning and Closure Plan does not anticipate having the original amenity lakes on the site. Progressive remediation has included the filling of these amenity lakes.

The fences and gates will continue to be maintained in functional condition to deter public access to the site. "Warning" signs have been placed at intervals on the perimeter fence, and a sign detailing the Proponent's contact number is located on the front entrance.

7.0 REHABILITATION

7.1 Objective

To progressively restore the excavations as far as practically possible to a landform that is aesthetically pleasing and functional and capable of supporting a viable end-use to the satisfaction of the landowner.

7.2 Rehabilitation Program

Rehabilitation of the site was initially planned with the original landowner Mrs. Yvonne Hocking to comprise of four small amenity lakes (ex-clay pits) surrounded by pasture. However, a change in land ownership to Stargaze has resulted in an alternative rehabilitation and final land-use plan, essentially filling the site (200,000 m³) to pre-excavation levels with sand and clean fill and stabilising with pasture grasses and native trees.

The alternative rehabilitation program is described in the Final Decommissioning and Closure Plan approved by the EPA in January 2017.

Rehabilitation undertaken to date is summarised as follows:

- Cell 1 has been partially filled by Stargaze, with a small amenity lake remaining;
- Stargaze has filled and re-contoured the Cell 2 excavation area to pre-excavation levels in preparation for a planned return of pasture species via planting;
- Cell 3 has been filled by Stargaze, with the exception of a small pond in the north-west.

As the Proponent, Midland Brick remains committed to implementing the Final Decommissioning and Closure Plan until the Minister for the Environment, determines, on advice of the EPA, that the proponent's decommissioning/closure responsibilities have been fulfilled.

8.0 ADAPTIVE MANGAGEMENT

The adaptive management approach for this EMP is premised on a structured and iterative internal monitoring, auditing, and review process to improve long-term management outcomes.

8.1 Internal Site Audit and Annual Reports.

The proponent has recently appointed an Environment and Planning Coordinator for Raw Materials. A priority point of action has been to conduct Internal Site Audits at all Midland Brick clay pits, against the conditions of the various Development Approvals, Planning Approvals, Extractive Industries Licenses, Western Australia Planning Commission Approvals, Ministerial Statements, DWER Licensing and EMP commitments.

The Internal Site Audit process also considers monitoring undertaken by external consultants such as groundwater monitoring and site surveys to determine the depth and footprint of excavation. Analysis of longitudinal variance is performed as a diagnostic for management response.

Voluntary Annual Reports will be implemented will be submitted to the City of Swan for review.

The Annual Report will apply the following criteria:

- Quarry progress;
- Progress of rehabilitation (if applicable);
- Contingency actions and outcomes;
- Community Complaints and Response;
- Surface and groundwater management
 - Drainage management
 - Surface water monitoring
 - Groundwater monitoring; and
- Compliance with this EMP.

Compliance Assessment Program

In order to monitor the conditions of Ministerial Statement 657, a Compliance Assessment Program (CAP), inclusive of an audit program, has been prepared by Midland Brick, in accordance with the OEPA's Post Assessment Guidelines for Preparing a CAP and includes the following information:

- Frequency of compliance reporting;
- Approach and timing of compliance reports;
- Retention of compliance assessments;
- Method of reporting of potential non-compliance and corrective actions taken; and
- Table of contents of Compliance Assessments Reports.

The frequency of Compliance Audit Reports is not specified in Ministerial Statement 657 however, the proponent has been submitting them to DWER biennially and intends to maintain this regime given the relatively small campaign of clay extraction each year.

8.2 5-year Performance Review Report

The Proponent also conducts a 5-year Performance Review Report, assessed against the requirements of Statement 657. This is also submitted to DWER for review. The most recent report was submitted in December 2021 for 2016-2021.

9.0 MAKING THE EMP PUBLICLY AVAILABLE

A copy of the Environmental Management Program is to be published at midlandbrick.com.au on approval. Timeframe is on advice of the DWER.

10. TABLE 2: TABLE OF CONDITIONS IN MINISTERIAL STATEMENT 657 THAT ARE ADRESSED IN THIS EMP

Condition	Section of EMP or page number
<p>8-1 The proponent shall prepare, make publicly available and subsequently implement an Environmental Management Programme, to the requirements of the Minister for the Environment on advice of the Environmental Protection Authority.</p> <p>The plans, strategies or reports to be prepared as part of the Environmental Management Programme shall include the following:</p> <p>1. A staged quarrying strategy;</p>	<p>Section 3.3 Quarrying Strategy pg. 4</p>
<p>2. Drainage management plan;</p>	<p>Section 4.0 Drainage management pg. 7</p>
<p>3. Groundwater management and protection;</p>	<p>Section 5.0 Groundwater protection plan pg. 9</p>
<p>4. Progressive rehabilitation;</p>	<p>Section 7.0 Rehabilitation pg. 11</p>
<p>5. Procedures to minimise noise, dust and visual impacts associated with the quarrying and transport operations;</p>	<p>Section 6.0 Management of potential social impacts pg. 10</p>
<p>6. Public safety and mosquito breeding;</p>	<p>Section 6.3 Community health and safety, pg. 11</p>
<p>7. Periodic reporting of monitoring results; and</p>	<p>Section 8.1 Compliance assessment Program pg. 12</p>
<p>8. Consequential changes to project management to remedy unacceptable impacts.</p>	<p>Section 8.0 – Adaptive management, pg. 12 and Section 9.0 Making the EMP publicly available pg. 13</p>

11. REFERENCES

Bowman Bishaw Gorham (1998) Environmental Management Program, Clay Excavation, Lots 40 and 41 Apple Street, Upper Swan (Formerly Lots 21 and 22). Response to Ministerial Statement No. 265. Report prepared for Midland Brick Company Pty Ltd.

OEPA (2012) Post Assessment Guideline for Preparing a Compliance Assessment Report, Office of Environmental Protection Authority.

RPS (2011) Performance and Compliance Report 2008–2011; Lots 42 and 43 Apple Street (Ministerial Statement 657) and Hallett and Copley Roads Area (Ministerial Statement 699), Upper Swan.

RPS (2013) Performance and Compliance Report 2011-2013; Lots 42 and 43 Apple Street (Ministerial Statement 657), Upper Swan.

RPS (2015) Final Decommissioning and Closure Plan; Apple St (Ministerial Statement 657), Upper Swan.

RPS (2017) Performance Review and Performance and Compliance Report 2013-2016; Lots 42 and 43 Apple Street (Ministerial Statement 657), Upper Swan

RPS (2018). Performance and Compliance Report 2016-2018; Lots 42 and 43 Apple Street Ministerial Statement 657), Upper Swan.

RPS (2020). Performance and Compliance Report 2018-2020; Lots 42 and 43 Apple Street Ministerial Statement 657), Upper Swan

RPS Bowman Bishaw Gorham (2006a) Lots 42 and 43 Apple Street, Upper Swan Performance and Compliance Report and Hallett and Copley Roads Area, Upper Swan Performance and Compliance Report and Performance Review. Ministerial Statement 657 and 699. Prepared for Midland Brick Company Pty Ltd. Report No. L99195:4, Rev 0, December.

RPS Bowman Bishaw Gorham (2006b) Environmental Management Program, Clay Excavation: Lots 42 and 43 Apple Street, Upper Swan. Ministerial Statement 657. Prepared for Midland Brick Company Pty Ltd. Report No. L99195, Rev 0, October.

RPS Bowman Bishaw Gorham (2006c) Midland Brick Clay Excavation Lots 42 and 43 Apple Street – Preliminary Decommissioning Plan. Report prepared for Midland Brick Company. Report No.L99195:2, Rev 0, November.

Appendix 1 – Ministerial Statement 657

Appendix 2 – EMP (1998) and EMP (2006)

Appendix 3 – BGC's Environmental Policy

