



Undertaking to the Minister for Energy and Resources

Entered into under section 107 of the *Mineral Resources (Sustainable Development) Act 1990 (Vic)* (**the Act**) by Hanson Construction Materials Pty Ltd (ACN 009679734) in favour of the Minister for Energy and Resources.

In determining that this enforceable undertaking (**Undertaking**) is an appropriate enforcement mechanism to address the identified non-compliance at Work Authority 279 held by Hanson Construction Material Pty Ltd, the Minister for Energy and Resources via her delegate has considered the criteria specified in guidelines made under section 120A of the Act and notified in the government gazette on 17 February 2022.

1. Person(s) giving the Undertaking

This Undertaking is entered into by Hanson Construction Materials Pty Ltd (ACN 009679734) (**Hanson**) and the Minister for Energy and Resources of the State of Victoria via her delegate (**Minister**) for the purposes of section 107 of the Act.

2. Definitions and interpretation

Term	Definition
Act	Mineral Resources (Sustainable Development) Act 1990 (Vic)
EIL	Extractive Industry Licence, within the meaning of the <i>Extractive Industries Act 1966</i> (Vic)
ERR	Earth Resources Regulation, being Victoria's regulator of mining licences and extractive industry work authorities within the framework set out under the Act
Hanson	Hanson Construction Materials Pty Ltd (ACN 009679734), being the holder of WA279
Site	The parcel of land located approximately 3km East of Axedale, Victoria on Brownes Rd which is the subject of WA279
Speedway	An access road constructed on the Site contrary to the Work Plan. Aerial image showing location provided as Annexure C
WA279	Extractive Industry Work Authority 279, relating to the Site
Work Plan	The current approved work plan for WA279, comprising: <ul style="list-style-type: none">the Working Proposal dated July 1993 and approved on 27 January 1994;the Working Proposal dated 15 July 2005 and approved on 22 October 2007; andthe work plan variation conditions dated 15 July 2005 and approved on 22 October 2007.



3. Background

Details of relevant Work Plan and Work Plan Variation

- 3.1 Hanson is the holder of WA279 under the Act. WA279 covers the Axedale Sand and Gravel Quarry which is situated approximately 3km east of Axedale and located on Brownes Road, Axedale (VIC) (**the Site**).
- 3.2 The Work Plan describes permitted work activities that support the development of the Site for the purpose of excavating, processing, and producing a sand and gravel product from the authorised extraction area.
- 3.3 Hanson is authorised under WA279 to only undertake work at the Site in accordance with the Work Plan and must comply with the conditions of each instrument which forms the Work Plan.

Outcomes of September 2021 compliance audit

- 3.4 On 20 and 21 September 2021, a compliance audit of WA279 was undertaken by ERR at the Site (**the Audit**). The Site was audited against the following documents:
 - a) The Work Plan;
 - b) ATC Williams Water Management Plan 117061.03R03 dated February 2021;
 - c) ATC Williams Ground Control Management Plan 117061.03R02 dated January 2021;
 - d) Goldfields Revegetation Pty Ltd Flora Assessment dated April 1998; and
 - e) City of Greater Bendigo Planning Permit dated 19 April 2007, as amended on 15 October 2018.
- 3.5 During the Audit, ERR observed activities that were not in compliance with WA279 at the Site, including works being undertaken otherwise than in accordance with the Work Plan and instances of non-compliance with the Work Plan.
- 3.6 The instances of non-compliance identified during the Audit that require rectification as of the date of this Undertaking are set out below at Annexure A and Annexure B.
- 3.7 The Minister considers that Hanson has contravened section 8AB(2)(a) of the Act by carrying out extractive industry under a work authority otherwise than in accordance with the approved Work Plan.
- 3.8 On 18 October 2021 Hanson submitted to ERR a Remediation Action Plan, setting out proposed actions to remedy the alleged non-compliances.
- 3.9 On 18 November 2021 ERR rejected the submission of the Remediation Action Plan on the basis that the Plan required the ongoing use of non-compliant/unapproved aspects of the Site and the timeframe for remediation did not reflect the scope of the identified non-compliances. ERR provided draft section 110 notices for Hanson to consider.

Issuing of section 110 notices under the Act

- 3.10 On 10 December 2021, ERR issued two section 110 notices under the Act in connection with two instances of non-compliance at the Site, being those described in the table at Annexure B (**the December Section 110 Notices**).



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- 3.11 The December Section 110 Notices required Hanson to, among other things, immediately cease the use of unapproved slime dams and freshwater dams at the Site and to cease any further increase of the disturbed surface area at the Site until the relevant non-compliance had been rectified.
- 3.12 On 14 January 2022, ERR inspectors conducted a further visit to the Site and observed that the southern terminal batter on the north-eastern extraction area was not compliant with the Work Plan. This led to a further section 110 notice being issued on 24 January 2022, which required Hanson to immediately cease extracting at an angle greater than one horizontal to one vertical.
- 3.13 Hanson complied with all section 110 notices within the required timeframes.

Hanson's response

- 3.14 In response to ERR's observations above, Hanson:
 - (a) intends to:
 - a. submit a Work Plan Variation (**WPV**) to address some of the non-compliances at the Site, and to seek a pathway to compliance for operations to continue in the interim; and
 - b. otherwise address instances of non-compliance at the Site;
 - (b) acknowledges that its conduct was likely to have contravened section 8AB(2)(a) of the Act;
 - (c) agrees to enter into an undertaking with a view to Hanson achieving compliance with requirements under its Work Plan, WA279 and the Act;
 - (d) understands that the WPV process is a separate and distinct process from this Undertaking.

4. Commencement

- 4.1 This Undertaking comes into effect upon it being duly executed by Hanson and signed by the Minister by her delegate (**the Commencement Date**).
- 4.2 This Undertaking will cease to have effect upon Hanson complying with each of the requirements in clause 5.1 below.

5. Undertaking

- 5.1 Hanson undertakes for the purposes of section 107 of the Act that it will comply with the following conditions:
 - (a) Hanson will rectify the identified non-compliances described at:
 - (i) Annexure A, being the non-compliances and rectifications Hanson undertakes to complete regardless of whether it applies for a WPV in accordance with clause 5.1(b); and
 - (ii) to the extent necessary those listed at Annexure B, being non-compliances and rectifications Hanson undertakes to complete in the event it:
 - (A) does not apply for a WPV in accordance with clause 5.1(b), or is not successful in any such application that is made; or
 - (B) does not seek to address these non-compliances as part of any WPV made in accordance with clause 5.1(b),
- by undertaking the specified rectification activities within the specified timeframes as set out in the Annexures.



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- (b) If Hanson intends to submit a WPV, it must also comply with the following related conditions:
- (i) Hanson must submit a WPV to ERR within 6 months of the Commencement Date.
 - (ii) Hanson must not unreasonably delay the process of obtaining of an approved WPV by ensuring that any requests for change, or the acquisition of any permits or approvals from relevant government agencies, as required, are undertaken in a timely manner.
 - (iii) In the period following submission of a WPV to ERR and pending the outcome of same, Hanson will continue to engage constructively with ERR regarding a schedule for progressive rectification works for non-compliances sought to be addressed by the WPV, and any non-compliances that would otherwise not be addressed and cured as a result of the WPV will continue to be rectified by Hanson in accordance with Annexure A.
 - (iv) If ERR refuses to approve the WPV in accordance with section 77HB(1)(c) of the Act (**Refusal or Refused**), Hanson must ensure the non-compliances described at Annexure B are rectified in accordance with that annexure.
- (c) Hanson will engage with the Department of Energy, Environment and Climate Action (**DEECA**) and the City of Greater Bendigo Council (**Council**) in relation to any vegetation offsets that are required for impacted areas of unauthorised vegetation disturbance at the Site and supply ERR with evidence of the acquisition of the requisite vegetation offsets.
- (d) Hanson will make a financial donation payable either to the Greening Bendigo Program through the Council or another native vegetation program of Hanson's choosing to the value of either:
- (i) an amount equivalent to the cost of the vegetation offsets determined in accordance with paragraph (c) above, being payable within 2 months of the determination of the vegetation offsets; or
 - (ii) to the value of \$136,000, being payable within 2 months of the Commencement Date.
- (e) Hanson will engage with the Victorian extractive industry and share key learnings as a result of the identified non-compliances and enforceable undertaking process, including by:
- (i) reflecting on how its actions giving rise to the non-compliances have impacted the environment and changes to processes made as a result of lessons learned and knowledge gained through reaching a resolution through this Undertaking; and
 - (ii) delivering the results of the reflection described above to the industry within 6 months after this Undertaking has been complied with through:
 - a. publishing a case study in an extractive industry publication (such as *Sand & Stone* or a similar industry publication);
 - b. publishing a case study on Hanson's website; and
 - c. delivering a presentation at an industry event (such as a *Cement Concrete and Aggregates Australia* event or forum or a similar industry event).



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- 5.2 While this Undertaking is in effect and in so far as ERR remains satisfied its terms are being complied with, the Minister will not take further enforcement action against Hanson in respect of the following operational activities at the Site:
- (a) Extraction of sand and gravel from the approved extraction areas provided that there is no further increase of the disturbed area beyond:
 - (i) the currently disturbed area of 181.53Ha; or
 - (ii) if a WPV is approved:
 - i. the maximum disturbed area specified in the WPV; or
 - ii. otherwise, the area authorised by the approved WPV.
 - (b) Washing and processing of sand and gravel using the existing plant and any other plant described in and permitted by the Work Plan or any WPV.
 - (c) The use of all unapproved dams as marked on the map at Annexure E (see Annexure D for the location of the unapproved dams with reference to the Site), subject to the following conditions:
 - (i) any and all use of slimes dams constructed within 30 metres of a waterway (as defined in the *Water Act 1989* (Vic)) is not permitted, unless approved by a WPV; and
 - (ii) if further capacity is required, Hanson is permitted to harvest dried slimes or reprocess slimes to create capacity or
 - (iii) if a WPV is approved which allows use of slimes dams pursuant to certain conditions stated in the WPV, in accordance with those conditions.
 - (d) The use of the Speedway, subject to the following condition:
 - (i) Hanson will install culverts where appropriate once a works on waterways permit is obtained from the relevant Catchment Management Authority (if required).
 - (ii) if a WPV is approved which allows use of the Speedway subject to certain conditions stated in the WPV, in accordance with those conditions.

6. Reporting and Monitoring

- 6.1 Hanson is to provide written progress reports to ERR every six months, with the first report to be submitted 6 months after the Commencement Date, to outline the activities being undertaken to address the non-compliances described at Annexure A and, to the extent necessary, the non-compliances described at Annexure B.
- 6.2 In addition to the above, Hanson is to notify ERR in writing of completion of significant milestones with respect to the matters at paragraph 5.1(a) to (e) of the Undertaking.
- 6.3 The progress reports and notifications contemplated in 6.1 and 6.2 above are to be provided by email to the following ERR staff:
- (a) Judy Scott – Chief Inspector – ERRChiefInspector@ecodev.vic.gov.au; and
 - (b) any other person nominated by ERR from time to time.



7. Acknowledgement

7.1 Hanson acknowledges that:

- (a) ERR may make this Undertaking publicly available including by publishing it on ERR's website.
- (b) ERR may from time to time, make public reference to this Undertaking including in news media statements and in ERR publications.
- (c) This Undertaking in no way derogates from the rights and remedies available to any other person arising from the alleged conduct.
- (d) This Undertaking will not restrict the ability of ERR to rely on other enforcement mechanisms under the Act:
 - (i) in respect of Hanson's activities at WA279, other than those addressed in this Undertaking and subject to Hanson's compliance with this Undertaking; or
 - (ii) in relation to any other site Hanson operates.
- (e) It is an offence under section 108 of the Act to contravene a section 107 Undertaking.



Department of Energy, Environment
and Climate Action

Executed as an Undertaking

The Company

Executed by Hanson Construction Materials Pty Ltd (ACN 009679734) pursuant to section 127(1) of the Corporations Act 2001 by:

[Redacted Signature]

Director Signature

Philip Schacht

Director Name (print)

Date: 28 September 2023

[Redacted Signature]

Director / ~~Company Secretary~~ Signature

Victoria Vincent

Director / ~~Company Secretary~~ Name (print)

Date: 28 September 2023

The Minister

Executed by JUDITH SCOTT, Chief Inspector, as delegate of the Minister for Energy and Resources of the State of Victoria:

[Redacted Signature]

[Minister's Delegate Signature]

Date 28/09/2023



ANNEXURE A

Identified non-compliances and rectifications Hanson undertakes to complete regardless of whether it applies for a WPV application:

Instance of non-compliance	Source of obligation	Relevant condition	Identified Non-Compliance	Rectifications that Hanson undertakes to carry out if not addressed through WPV	Timeframes
1.	Work Plan - Condition 25 – Native Vegetation	Condition 25.1.1 - There is to be no removal of native vegetation from the remnant vegetation within the "Remnant Protection Overlay" area.	An area covered by a Vegetation Protection Overlay - VP02 has been cleared for the construction of unauthorised slimes dam(s).	1.Consult with the Council in relation to the unauthorised clearance of native vegetation in the area covered by the VP02 environmental overlay; and 2. Provide a written update to ERR within 1 month of undertaking consultation with the Council. The written update is to indicate when Hanson will comply with any requirements imposed by the Council.	
2.	Work Plan - Condition 11 – Erosion Control	Condition 11.1 - Work Authority holder must undertake all necessary works to ensure that the potential for erosion, whether inside or outside the Work Authority area, arising from the operation is minimised.	It was observed on the east face of the northeast pit that proper revegetation and stabilisation of disturbed areas had not been undertaken.	1.Stabilise the stage 1 interim boundary with pasture planting and a minimum topsoil cover.	Commence within 3 months of the Commencement Date. Complete within 12 months of the Commencement Date.



3.	Work Plan Section 4 – Planned Extraction Sequence	Section 4.2 - Stage 1 – The Stage I boundary will be an interim batter along the fence line, stabilised with pasture planting over a minimum soil cover	It was observed that the batter was not appropriately stabilised with pasture planting over a minimum soil cover as required under the Work Plan.	1.Stabilise the stage 1 interim boundary with pasture planting and a minimum topsoil cover.	Commence within 3 months of the Commencement Date. Complete within 12 months of the Commencement Date.
4.	Work Plan Section 4 – Planned Extraction Sequence	Section 4.2 - Stage 1 – A 2 metres high perimeter safety bund will be constructed progressively around the excavation	It was observed that there was no evidence of compliance with this condition, there was no bunding constructed as required under the Work Plan.	1.Construct a 2 metre high safety bund around the stage 1 extraction area.	Commence within 3 months of the Commencement Date. Complete by 30 June 2023.
5.	Work Plan Section 4 – Planned Extraction Sequence	Section 4.2 - Stage 1 – The excavation will be progressively deepened and widened, while maintaining stable extraction slopes of at least one horizontal to one vertical.	Extraction batters steeper than 1V:1H were observed, including but not limited to an area in the northern extraction area, specifically the southern face was constructed near vertical. These slopes exceeding 1V:1H are not approved within the Work Plan.	1.Ensure that no extraction batters for new or terminal faces are steeper than 1V:1H. For any existing batters steeper than 1V:1H, remediate to 1V:1H through the planned extraction sequence, if deemed safe.	Commence within 3 months of the Commencement Date. Provide evidence to ERR that non-compliance has been rectified by 31 December 2024.
6.	Work Plan Section 4 – Planned Extraction Sequence	Section 4.5.1 – Culvert Sizing - The internal access track is required to cross the waterway labelled 'B' and the two drainage lines labelled 'A' and 'C' on Appendix 3.3. It is proposed to size the	It was observed that waterways/drainage lines where culverts were installed did not meet the required sizes as detailed within Table 1 – Culvert sizes of the Work Plan.	1.Undertake an audit of constructed roads onsite against Table 1 – Culvert sizes of the Work Plan; and 2. Ensure that all culvert pipework sizes under haul roads are in accordance with	If no third party approvals are required, commence within 3 months of the Commencement Date. Or If third party approvals are required, apply for



		culverts to match those of the Road Authority to maintain a consistent storm interval criteria.		Table 1 – Culvert sizes of the Work Plan.	<p>approvals within 3 months of the Commencement Date and commence within 3 months of receipt of approvals.</p> <p>Provide evidence to ERR that non-compliance has been rectified within 12 months of the Commencement Date or if third party approvals are required, within 12 months of receipt of approvals.</p>
7.	Work Plan Section 4 – Planned Extraction Sequence	Section 4.7 – Buffer Zones -Toolleen-Axedale Road: Existing trees provide a natural visual screen to the processing plant. The existing trees will be fenced to permit regeneration and will be augmented by additional planting, as recommended in the flora assessment.	It was observed that the fencing was partial and incomplete, and there was no additional planting as required under the Work Plan.	1.Fence the area adjacent to the Toolleen Axedale Road; and 2.Undertake additional planting as required under the Work Plan.	<p>Commence fencing works within 3 months of the Commencement Date and subject to the completion of item 1 above, complete fencing works within 12 months of the Commencement Date.</p> <p>Undertake planting in the first planting season following the Commencement Date.</p>



8.	Work Plan Section 5 – Environmental Management Plan	Section 5.2 – Groundwater Protection - The effect of the excavation on the water table will be monitored from both the proposed sand extraction and the existing kaolin extraction. The effect of excavation on the water quality will also be monitored.	When requested by ERR inspectors, no evidence of compliance with this condition was supplied.	1. Commence and/or provide water monitoring results to ERR as described in the Work Plan; and 2. Provide reporting in relation to these results including whether the water quality is found to be affected.	Supply ERR with the report containing water monitoring results within 6 months from the Commencement Date, including remedial plan if water quality is found to be affected.
9.	Work Plan - Condition 3- Buffer Zones and Visual Screening	Condition 3.1 - Excavation may not take place within the buffer zones shown on the approved Work Plan.	In an area in the northeast of the former EIL1379 it was observed that removal of topsoil had been undertaken outside the approved area. The disturbance impacted the buffer zone and an area beyond the buffer.	1. Reinstate the topsoil along the northeast boundary of EIL1379. The extraction limit posts will need to be re-surveyed to the correct location.	Commence within 3 months of the Commencement Date. Complete within 12 months from the Commencement Date.
10.	Work Plan - Condition 3 – Buffer Zones and Visual Screening	Condition 3.3 - Existing vegetation (with the exception of noxious weeds) within the licence area, and not within the area subject to surface disturbance as shown on the approved Work Plan, must be preserved and maintained.	It was observed that native vegetation removal had been undertaken within the buffer zones.	1. Obtain vegetation offsets for impacted areas of unauthorised vegetation disturbance, as required by clause 5.1(c) above.	Complete within 12 months after agreement reached with the Department and Council.
11.	Various (as the case may be – set out in Annexure B)	Various (as the case may be – set out in Annexure B)	Various (as the case may be – set out in Annexure B)	1. In the event that Hanson makes a WPV application but an item listed in Annexure B	For any item listed in Annexure B below that is not included as part



				below is not addressed as part of that WPV application, those items will be taken to form part of Annexure A and Hanson undertakes to rectify these non-compliances accordingly.	of any WPV and/or WPV with respect to the Site and subsequently becomes part of Annexure A, the timeframe listed for that item in Annexure B will apply.
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ANNEXURE B

Identified non-compliances and rectifications Hanson undertakes to complete in the event it does not apply for, or is not successful in obtaining, approval of a WPV:

Instance of non-compliance	Source of obligation	Relevant condition	Identified Non-Compliance	Rectifications that Hanson undertakes to carry out if not addressed through WPV	Timeframes
1.	Work Plan - Condition 5 – Surface Disturbance	Condition 5.1 - The area of surface disturbance must be kept to a minimum. An area of no greater than 6 hectares may remain unrehabilitated at any one time (not including areas subject to rehabilitation/revegetation).	It was observed that an area greater than 6 hectares was disturbed, estimated to exceed around 144 hectares. In response to the section 110 notice, the survey provided by Hanson on 24 December 2021 named ' <i>ASG Full Site Area & Volumes 20-12-2021 Annotation Report</i> ' highlights a total area of disturbance of 181.53Ha.	1. Rehabilitate the Site such that an area of no greater than 6 hectares may remain unrehabilitated at any one time (not including areas subject to rehabilitation/revegetation)	Commence within 6 months of the Commencement Date (if no WPV application is submitted) or within 2 months of Refusal of WPV. Complete within 3 years of Commencement Date (if no WPV is submitted) or within 3 years of Refusal of WPV.
2.	Work Plan - Condition 7– Internal Roads	Condition 7.1 - Internal roads must be sited as approved.	The constructed internal haul road(s) are positioned in locations not approved in the Work Plan including the access road known as the Speedway. Locations of unapproved roads are shown in the aerial image annexed.	1. Decommission all unapproved internal haul roads subject to the terms of this Undertaking; and 2. Establish haul roads in accordance with the Work Plan.	Commence within 6 months of the Commencement Date (if no WPV application is submitted) or within 2 months of Refusal of WPV. Complete within 3 years of Commencement Date (if no WPV application



					is submitted) or within 3 years of Refusal of WPV.
3.	Work Plan: Condition 9 - Drainage and Discharge Control	Condition 9.4 - Sediment retention structures including dams must be constructed in accordance with the approved Work Plan.	Sediment retention dams have been constructed in waterways and drainage lines not approved in the Work Plan. It was noted that dams were constructed within drainage line A, waterway B (refer to <i>Appendix 3.3 – Working Plan and Extraction Sequence</i>) and south of the surface infrastructure area off Browns Lane.	1. Decommission unapproved sediment retention dams (as marked on the maps at Annexure F) which have been constructed in waterways and drainage lines, specifically those noted as constructed within drainage line A, waterway B (refer to <i>Appendix 3.3 – Working Plan and Extraction Sequence</i>) and south of the surface infrastructure area off Browns Lane below the car park.	Commence within 6 months of the Commencement Date (if no WPV application is submitted) or within 2 months of Refusal of WPV. Complete within 3 years of Commencement Date (if no WPV application is submitted) or within 3 years of Refusal of WPV.
4.	Work Plan - Condition 10 – Tailings, Slimes and Water Dams	Condition 10.1 - The Work Authority holder must ensure that the planning, construction, operation and safety management of dams at the work site are undertaken in compliance with the Work Plan.	It was observed that 5 (as per Annexure E) slimes dams and a freshwater dam have been constructed which are not approved in the Work Plan. The utilisation of slime dams as a process for slimes management is not approved within the Work Plan.	1. Decommission all unapproved slimes and freshwater dams (as marked on the map at Annexure E) and rehabilitate impacted land; and 2. Engage and consult with relevant Water Authority to pursue guidance in relation to rehabilitation requirements.	Commence within 6months of the Commencement Date (if no WPV application is submitted) or within 2 months of Refusal of WPV. Complete within 3 years of Commencement Date (if no WPV application is submitted) or within 3 years of Refusal of WPV.



5.	Work Plan Section 4 – Planned Extraction Sequence	Section 4.9 – Overburden Disposal – Overburden, stripped ahead of the excavation, will be' progressively returned to the surface of the final rehabilitated landform prior to seeding and tree planting.	Slimes and overburden have been stored throughout the Site in unapproved locations (as marked on the map at Annexure G).	1. Remove all slimes and overburden which has been stored in unapproved areas; and 2. Undertake rehabilitation of those areas disturbed via the placement of this material including but not limited to roadways.	Commence within 6months of the Commencement Date (if no WPV application is submitted) or within 2 months of Refusal of WPV. Complete within 3 years of Commencement Date (if no WPV application is submitted) or within 3 years of Refusal of WPV.
6.	Planning permit No. – DM/307/2006 – Goulburn Murray Water	Condition 19 - There must be no buildings or processing facilities constructed within 30 metres of any waterway.	It was observed that an unauthorised slimes dams used as a processing facility has been constructed within the immediate area of waterway B (referenced as dam 3 & 5 of Annexure E).	1. Remove the slimes dams from waterway B and decommission the unauthorised dam which has been constructed in drainage line C and undertake rehabilitation of those areas disturbed via the placement of this material; and 2. Consult with Goulburn Murray Water in relation to the waterway disturbance and provide GMW's response to ERR, and evidence of compliance by Hanson to the GMW requirements.	Commence within 6 months of the Commencement Date (if no WPV application is submitted) or within 2 months of Refusal of WPV. Complete within 3 years of Commencement Date (if no WPV application is submitted) or within 3 years of Refusal of WPV.



ANNEXURE C

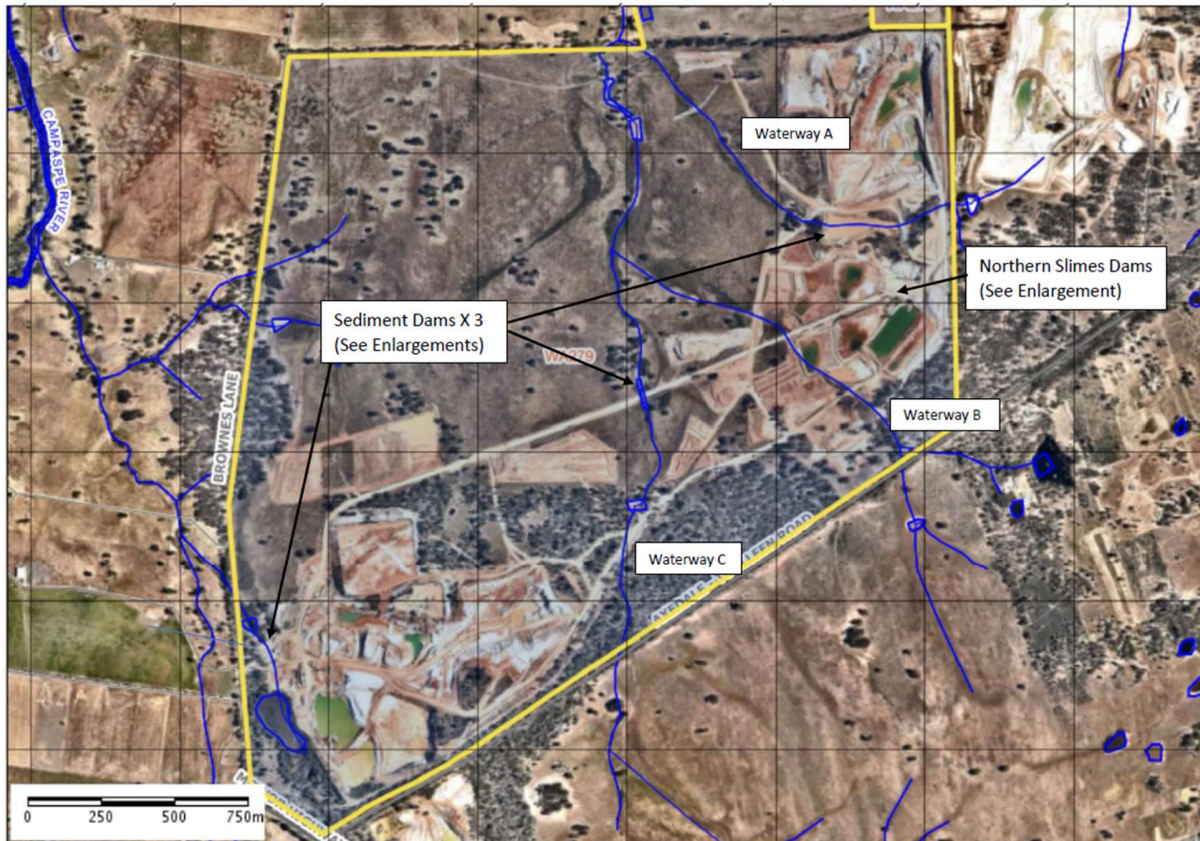
Aerial image showing location of Speedway





ANNEXURE D

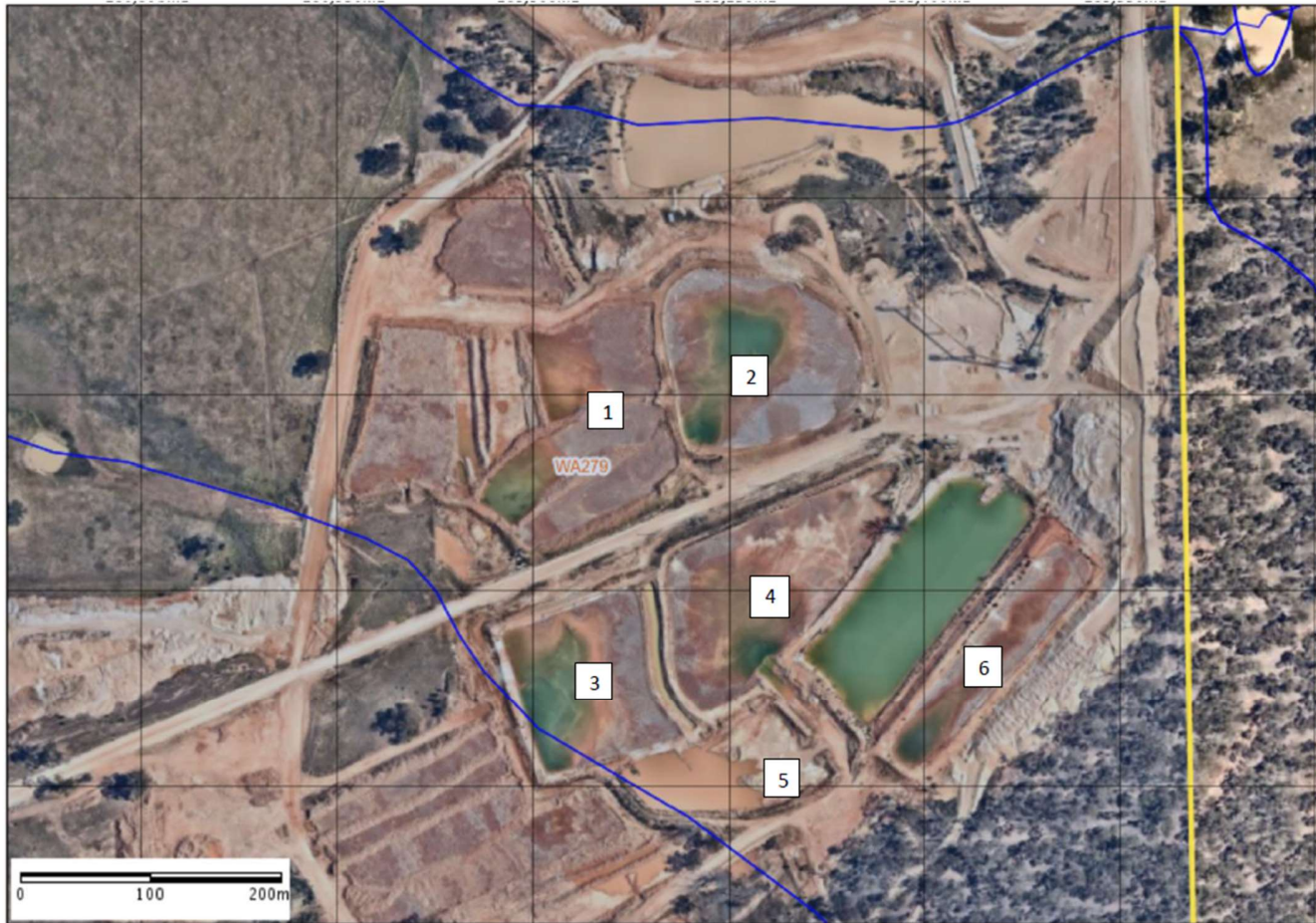
Aerial image showing location of existing slimes dams





ANNEXURE E

Aerial image showing location of unapproved slimes and freshwater dams (Enlargement)



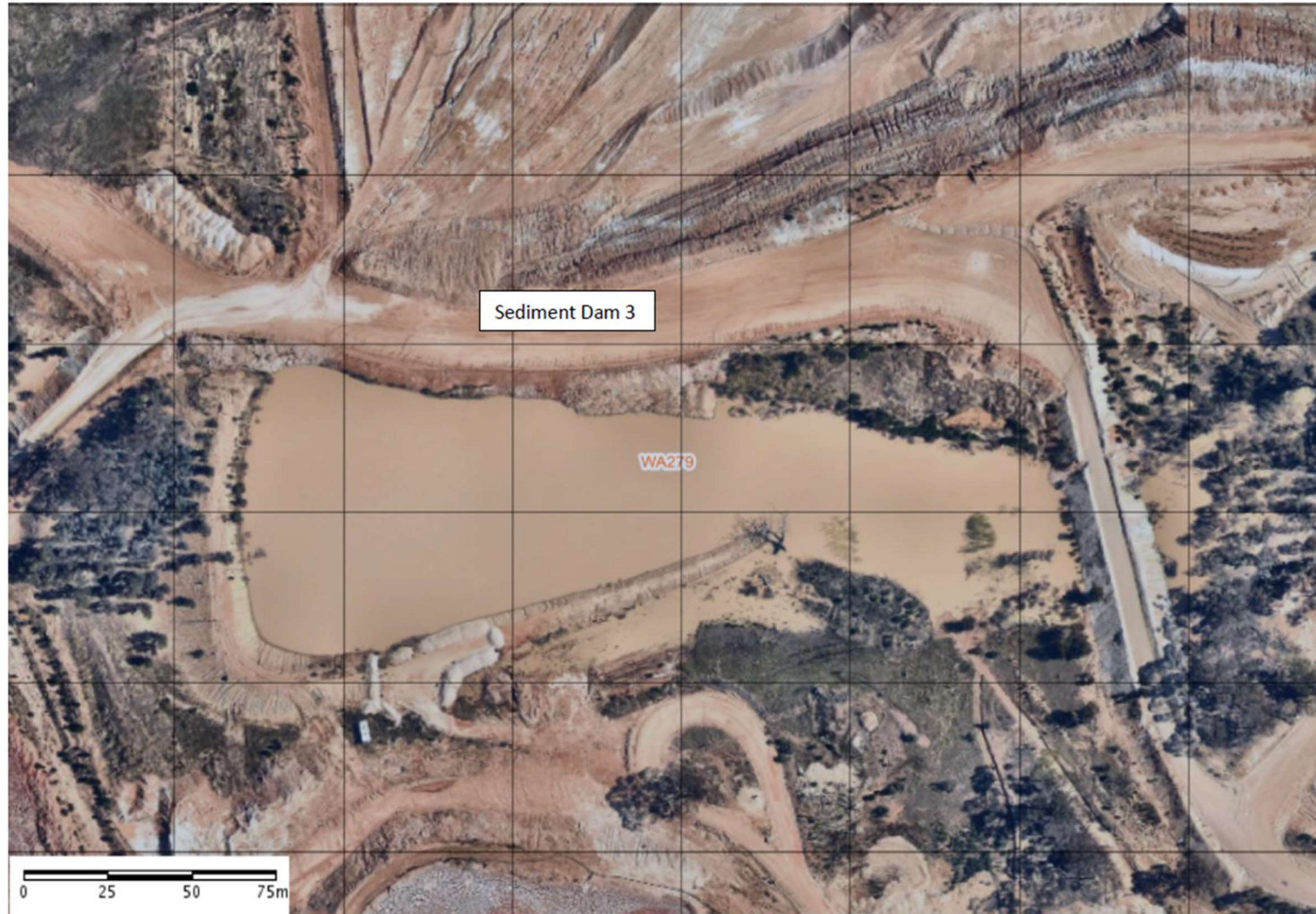


ANNEXURE F

Aerial images showing locations of unapproved sediment retention dams









ANNEXURE G

Aerial images showing locations of unapproved overburden storage

