
NSW Resources

Resources Regulator



Compliance audit program

ML 1568 – Lynton Limestone Quarry

Ezy Lime Pty Ltd

May 2026

Published by the Department of Primary Industries and Regional Development

Title: ML1568-Lynton Limestone Quarry

Subtitle: Ezy Lime Pty Ltd

First published: May 2026

Department reference number: D26/40028

Amendment schedule		
Date	Version	Amendment
May 2026	1.0	First published

© State of New South Wales through the Department of Primary Industries and Regional Development 2026. You may copy, distribute, display, download and otherwise freely deal with this publication for any purpose, provided that you attribute the Department of Primary Industries and Regional Development as the owner. However, you must obtain permission if you wish to charge others for access to the publication (other than at cost); include the publication in advertising or a product for sale; modify the publication; or republish the publication on a website. You may freely link to the publication on a departmental website.

Disclaimer: The information contained in this publication is based on knowledge and understanding at the time of writing (March 2026) and may not be accurate, current or complete. The State of New South Wales (including Department of Primary Industries and Regional Development), the author and the publisher take no responsibility, and will accept no liability, for the accuracy, currency, reliability or correctness of any information included in the document (including material provided by third parties). Readers should make their own inquiries and rely on their own advice when making decisions related to material contained in this publication.

Table of Contents

1. Introduction	4
1.1. Background.....	4
1.2. Audit objectives	4
1.3. Audit scope	4
1.4. Audit criteria.....	4
1.5. Publishing and disclosure of information	5
2. Audit methods.....	6
2.1. Opening meeting.....	6
2.2. Site interviews and inspections	6
2.2.1. Data collection and verification	6
2.2.2. Site inspections.....	6
2.3. Closing meeting	6
2.4. Compliance assessment definitions	6
2.5. Reporting.....	8
3. Audit findings.....	9
3.1. Mining lease conditions	9
3.3.2. Annual rehabilitation reporting	17
4.2. Contractor management	18
5. Audit conclusions.....	20

1. Introduction

1.1. Background

Mining Lease 1568 (1992) was granted to Ezy Lime Pty Ltd on 26 October 2005 with an expiry date of 26 October 2026. ML1568 was at Gunningbland about 24 kilometres west of Parkes, New South Wales. ML1568 forms the operations referred to as Lynton Limestone Quarry.

As part of the compliance audit program, an audit of the mining operations associated with the Lynton Limestone Quarry was undertaken on 2 December 2025 by the Resources Regulator within the NSW Department of Primary Industries and Regional Development.

1.2. Audit objectives

The objectives of the audit were to:

- undertake a compliance audit of the Ezy Lime Pty Ltd mining operations against the requirements of the *Mining Act 1992*, the conditions of the mining lease and the prescribed standard conditions outlined in Schedule 8A Part 2 of the Mining Regulation 2016
- assess the operational performance of the mining operations and the ability of the licence holder and/or its operator to implement management systems and controls to provide for sustainable management of the operations.

1.3. Audit scope

The scope of the audit included:

- a review of documents and records pertaining to mining operations associated with the Lynton Limestone Quarry, as required by the standard conditions on mining leases and obligations under the *Mining Act 1992*
- the assessment of compliance for the period commencing 2 December 2023 and ending 2 December 2025.

1.4. Audit criteria

The audit criteria against which compliance was assessed included:

- *Mining Act 1992*, specifically Sections 5, 6, 163C to 163E, 163G, 378D
- Mining Regulation 2016, specifically clauses 59 to 68
- standard conditions for ML1568 outlined in Schedule 8A Part 2 of the Mining Regulation 2016
- general conditions for mining leases
- Form and way: Annual Rehabilitation Report and Forward Program
- Form and way: Rehabilitation objectives, rehabilitation completion criteria.

1.5. Publishing and disclosure of information

This audit report was published on the Regulator's website consistent with:

- Section 365 of the *Mining Act 1992*
- Resources Regulator's [Compliance publication policy](#)
- *Government Information (Public Access) Act 2009*.

2. Audit methods

The audit process involved interviewing site personnel, reviewing documentation and samples of records provided by the licence holder and/or operator to determine the level of compliance of the operations and assess the status of the operational performance. The audit process and methodology are described in more detail in the sections below.

2.1. Opening meeting

An opening meeting was held onsite on 2 December 2025. The audit team was introduced, and the scope of their responsibilities was conveyed to the auditee. The objectives and scope of the audit were outlined. The methods to be used by the team to conduct the audit were explained, including interviewing personnel, reviewing documentation, examining records and a site inspection to assess specific compliance requirements.

2.2. Site interviews and inspections

2.2.1. Data collection and verification

Where possible, documents and data provided during the audit process were reviewed electronically on the day. Where documents were unable to be reviewed on the day, they were provided following the audit.

All information obtained during the audit process was verified by the audit team where possible. For example, statements made by site personnel were verified by viewing documentation and records, including site photographs, where possible. Where suitable verification could not be provided, this has been identified in the audit findings as not determined.

2.2.2. Site inspections

A site inspection was undertaken of the mining operations including exploration activities under ML1568.

2.3. Closing meeting

A closing meeting was held on site on 2 December 2025. The objectives of this meeting were to discuss any outstanding matters, present preliminary findings and outline the process for finalising the audit report.

2.4. Compliance assessment definitions

The reporting of results from the compliance audit was determined based on the definitions presented below in Table 1.

Table 1: Compliance assessment definitions

Assessment	Criteria
Compliance	Sufficient and appropriate evidence is available to demonstrate the particular requirement has been complied with.
Non-compliance	<p>Clear evidence has been collected to demonstrate the particular requirement has not been complied with. There are 3 subcategories of non-compliance reflecting the severity and level of risk associated with the non-compliance:</p> <p>NC1 – the absence of planning or implementation of a required operational element which has the potential to result in a significant risk.</p> <p>NC2 – an isolated lapse or absence of control in the implementation of an operational element which is unlikely to result in a significant risk.</p> <p>NC3 – an administrative or reporting non-compliance which does not have a direct environmental or safety significance.</p> <p>Note: The identification of a non-compliance in this audit may or may not constitute a breach of, or offence under, the <i>Mining Act 1992</i>. Non-compliances identified in this audit report may be further investigated by the Regulator and regulatory actions may be undertaken.</p>
Observation of concern	<p>Where an auditee may be compliant at the time of the audit but there are issues that exist that could result in the potential for future non-compliance if not addressed.</p> <p>Observation of concern was also used where an issue may not have particular compliance requirements, but which was not conducive to good management or best practice.</p>
Suggestion for improvement	Where changes in processes or activities inspected or evaluated at the time of the audit could deliver improvement in relation to risk minimisation, sustainable outcomes and management practices.
Not determined	<p>The necessary evidence has not been collected to enable an assessment of compliance to be made within the scope of the audit.</p> <p>Reasons why the audit team could not collect the required information include:</p> <ul style="list-style-type: none"> insufficient information on the file relating to the period covered by the audit or insufficient evidence collected to reach a conclusion the wording on the criteria (approval condition) meant that no evidence could be gathered, or it was too difficult to gather the evidence. <p>A ‘not determined’ assessment was also made where the condition was outside the scope of the audit.</p>
Not applicable	<p>The circumstances of the authorisation or licence holder have changed and are no longer relevant (e.g. no longer mining, mining equipment and plant has been removed).</p> <p>An invoking element in the criteria was not activated within the scope of the audit.</p>

2.5. Reporting

Following completion of the audit, the audit checklists were completed, and audit notes were reviewed to compile a list of outstanding matters to be noted in the audit report. This report was prepared to provide an overview of the operational performance of the site in relation to the mining operations and identify any non-compliances or observations of concern noted by the auditors during the documentation review and interviews.

The draft audit findings were forwarded to Ezy Lime for comment. Consideration was given to the representations made during the finalisation of the audit report as discussed in the audit findings.

3. Audit findings

3.1. Mining lease conditions

3.1.1. Security deposit

Condition 2 of ML1568 required the lease holder to provide and maintain a security deposit to secure funding for the fulfilment of obligations under the mining lease.

The security amount required for ML1568 was \$167,000, which department records confirmed was held.

Observations made on site during the site inspection confirmed the security held was adequate for the mining operations in progress.

3.1.2. Co-operation agreement

Condition 3 of ML1568 required the lease holder to make reasonable attempts to enter into a co-operation agreement with the holders of any overlapping titles.

A search of the Minview database and department records confirmed that ML1568 overlapped with EL5323 and EL8928. Evolution Mining Pty Ltd was the holder of EL5323 and SRL OPS Pty Ltd was the holder of EL8928. The co-operation agreement condition was triggered for ML1568. No cooperation agreements were provided for review during the audit. The nominated contact person for Lynton Limestone Quarry then contacted Evolution Mining Pty Ltd and it was decided that a cooperation agreement was not necessary based on the licence strata, ML1568 and EL5323 did not coexist within the same depth interval. While the attempt to negotiate a cooperation agreement with EL5323 was satisfied, Lynton Limestone Quarry did not attempt to contact SRL OPS Pty Ltd for EL8928 overlapped. This was raised as an observation of concern one. Ezy Lime would need to make a reasonable attempt to negotiate a cooperation agreement with SRL OPS Pty Ltd.

3.1.3. Assessable prospecting operations

Condition 4 of ML1568 required the leaseholder to have development consent or the prior written approval of the Minister before carrying out any assessable prospecting operations on the lease area.

Lynton Limestone Quarry was granted development consent by Parkes Shire Council for extraction of up to 50,000 tons of limestone per annum on 20 October 2005. ML1568 was granted on 26 October 2005 within an area of about 50.3 ha for mining of limestone. Lynton Limestone Quarry did not carry out any assessable prospecting operations during 2024 or 2025. The requirements under condition 4 were not triggered and no applications for assessable prospecting operations were required.

3.2. Schedule 8A requirements

The Schedule 8A requirements commenced on 2 July 2021. Clause 31A (2) of the Mining Regulation 2016 included transitional arrangements for any mining lease that was in force on the

commencement day of the Schedule 8A provisions. For a large mine, the new provisions would not apply until 12 months after the commencement day. For a small mine, the new provisions would not apply until 24 months after the commencement day of the Schedule 8A requirements.

Lynton Limestone Quarry was considered a large mine, because an environment protection licence under the Environment Protection Authority (EPA) was held for crushing, grinding and mining activities. The requirements of Schedule 8A applied to ML1568 from July 2022. An assessment of compliance against the Schedule 8A requirements was undertaken for ML1568, as documented in the following sections.

3.2.1. Multiple mining leases

Clause 3 of Schedule 8A allowed a leaseholder to make application to have multiple mining leases relating to the same mine treated as a single lease for the purposes of Part 2 of Schedule 8A. Though not required, as there was only one mining lease at Lynton Limestone Quarry at the time of the audit, Ezy Lime made an application to treat ML1568 as a single lease for the purposes of Part 2 of Schedule 8A. This application was approved by the Resources Regulator on 16 January 2023.

3.2.2. Environmental management

Clause 4 required a lease holder to prevent, or if that was not reasonably practicable, minimise any harm to the environment arising from activities carried out under the mining leases.

Extraction of materials and processing operations were carried out under ML1568. The activities appeared to be reasonably well managed. The following observations were made:

- There was only one open-cut pit used for limestone extraction (Figure 1).
- There was one pond at the bottom of the pit that intersected the groundwater table surrounded by healthy grasses (Figure 2).
- Water from the pond was pumped up to the water truck for use in dust suppression (Figure 3).
- Unstable overburden materials were found on several areas of the quarry. This was raised as an observation of concern 2. Ezy Lime should stabilise all areas with overburden materials (Figure 4).
- Sediment fencing on overburden areas was not properly installed. This was raised as an observation of concern 3. Ezy Lime should repair and correctly install sediment and erosion control structures to protect sensitive areas of the mine during rain events (Figure 5).
- Stockpiles of overburden materials next to the perimeter fence served as a buffer to the adjacent paddock (Figure 6).
- The bund surrounding the diesel storage tank in the laydown area contained debris requiring removal. No spill kits were available for managing potential diesel spills in other areas. This was raised as an observation of concern 4 (Figure 7). No further actions required. Ezy Lime implemented corrective actions for this issue.
- A designated laydown area was used for storing equipment parts (Figure 8).
- Dirty water generated from the truck wash area lacked secondary containment and was discharged directly to land, creating a potential contamination risk. This was raised as an observation of concern 5. Ezy Lime was advised to consult with the EPA or the appropriate regulatory authority to address the issue (Figure 9).

Figure 1: Main open-cut pit



Figure 2: Grasses surrounding the groundwater pond



Figure 3: Pond water pumped up for dust suppression



Figure 4: Unstable overburden areas



Figure 5: Not properly installed sediment fencing



Figure 6: Overburden stockpiles next to perimeter fence



Figure 7: Diesel storage bund



Figure 8: Equipment storage yard



Figure 9: Truck wash area



3.2.3. Rehabilitation

Clause 5 required rehabilitation to occur as soon as reasonably practicable after disturbance. Extraction operation was in progress within the approved extraction boundary during the audit period. Processing, crushing, screening and stockpiling of limestone products were ongoing on all disturbed areas. Due to these activities, only weed spraying and inspections of water structures were undertaken as part of the rehabilitation activities.

3.2.4. Final land use

Clause 6 required the lease holder to ensure that rehabilitation of the mining area achieves the final land use.

The final landform and rehabilitation plan (FLRP) application (FLRP0001280) was assessed and approved by the Resources Regulator on 23 January 2024. The proposed final land uses for Lynton Limestone Quarry included:

- a final void
- agricultural grazing
- retained access road and structure suitable for agricultural land use
- retained dam for stock watering
- native ecosystem.

Lynton Limestone Quarry's representative said all disturbed areas were planned to remain in operation for mining activities.

3.2.5. Rehabilitation risk assessment

Clause 7 required the lease holder to conduct a rehabilitation risk assessment that identified, assessed and evaluated the risks that need to be addressed to achieve the rehabilitation objectives and completion criteria for the mine.

A copy of the rehabilitation risk assessment dated June 2023 was electronically sighted. The risk assessment identified the risk controls associated with each identified risk. Table 11 of the rehabilitation management plan (RMP) presented a trigger action response plan for each identified risk with a moderate risk rating and above.

3.2.6. Rehabilitation documents

Under clause 8 of Schedule 8A, clauses 9 to 16 apply where the security deposit required under the mining leases was more than the minimum deposit prescribed by the Act. It was noted the security required for ML1568 was \$167,000 more than the minimum security prescribed by the Act. As such, the provisions of clauses 9 to 16 of Schedule 8A apply to ML1568 and rehabilitation documents were required.

Further assessment was undertaken against clauses 9 to 16 for the mining leases.

3.2.7. General requirements for documents

Under clause 9 of Schedule 8A, the lease holder was required to prepare documents in a form approved by the Secretary and include any matter required to be included in the form and if required to be given to the Secretary.

The RMP, FLRP, annual rehabilitation reports for 2023 and 2024 and forward programs for 2024 and 2025 were all submitted using the approved form and way forms.

3.2.8. Rehabilitation management plan

Clause 10(1) required the lease holder of a large mine to prepare a RMP for the mining leases that included the following:

- a) A description of how the holder proposed to manage all aspects of the rehabilitation of the mining area.
- b) A description of the steps and actions the holder proposed to take to comply with the conditions of the mining lease that relate to rehabilitation.

- c) A summary of rehabilitation risk assessments conducted by the holder.
- d) The risk control measures identified in the rehabilitation risk assessments.
- e) The rehabilitation outcome documents for the mining lease.
- f) A statement of the performance outcomes for the matters addressed by the rehabilitation outcome documents and the ways in which those outcomes are to be measured and monitored.

The RMP prepared by Ezy Lime contained all the elements required by clause 10 (1)a to f.

Clause 11 required the lease holder to amend the RMP when given a written direction to do so by the Secretary, in accordance with the direction. There was no trigger for an amendment of the RMP.

3.2.9. Rehabilitation outcome documents

Clause 12 (1) required the lease holder to prepare the following rehabilitation outcome documents and give them to the Secretary for approval:

- a) The rehabilitation objectives statement, which sets out the rehabilitation objectives (ROBJ) required to achieve the final land use for the mining area.
- b) The rehabilitation completion criteria statement, which sets out criteria, the completion of which will demonstrate the achievement of the rehabilitation objectives.
- c) For a large mine, the final landform and rehabilitation plan (FLRP), showing a spatial depiction of the final land use.

The ROBJ and FLRP were lodged and approved on 23 January 2024. Table 6 of the RMP included the rehabilitation completion criteria for each of the final land use domain.

3.2.10. Forward program and annual rehabilitation report

Clause 13 (1) required the lease holder to prepare a forward program that included the schedule of mining activities for the next 3 years, a summary of spatial progression of rehabilitation and the rehabilitation of disturbed areas as soon as reasonably practicable after the disturbance occurs.

Ezy Lime submitted forward programs for 2024, and 2025. The activities observed onsite reflected what was in the forward programs.

Clause 13(2) required the lease holder to prepare an annual rehabilitation report (ARR) which shows the description of the rehabilitation undertaken, the progress made through the phases of rehabilitation provided for in the forward program and a report demonstrating progress made towards achievement of the following:

- i. The objectives set out in the rehabilitation objectives statement.
- ii. The criteria set out in the rehabilitation completion criteria statement.
- iii. For large mines- the final land use as spatially depicted in the FLRP.

Ezy Lime submitted ARR for 2023 and 2024. All areas remained in the active phase of operation. Weed spraying and inspections of water structures were undertaken.

3.2.11. Times of document preparation and submission

Clause 15 required the preparation and submission of the following documents in a timely manner as prescribed by the Secretary:

- RMP
- updated rehabilitation outcome documents
- forward program
- ARR
- rehabilitation completion criteria statement.

The ARR and forward program for Lynton Limestone Quarry were due for submission annually by 25 December each year. A warning letter was sent to Ezy Lime on 14 January 2025 for non-submission of the 2024 ARR and forward program due by 25 December 2024. Ezy Lime was given 30 days to comply with these requirements. Ezy Lime submitted the 2024 ARR and forward program on 24 January 2025. As suggestion for an improvement one, it was recommended for Ezy Lime to review the requirements of clause 15 for preparation and timely submission of all required documentation to ensure compliance.

3.2.12. Documents to be publicly available

Clause 16 required the lease holder to make the RMP, forward program and ARR publicly available by publishing it on the website and/or providing a copy upon written request without charge to a person within 14 days after the request was received.

Ezy Lime had a website at [AusRock Quarries – Supplying quarry products to Central West NSW](#) . The RMP, forward program and ARRs were all published on its website.

3.2.13. Records management

Sections 163D and 163E of the *Mining Act 1992* related to the creation and maintenance of records required under the Act, the regulations, or a condition of title. Records must be kept in a legible form for production to any inspector and must be maintained for 4 years after the expiry or cancellation of the title. Clause 17 required the lease holder to create and maintain records to demonstrate compliance with the requirements of Schedule 8A, Part 2.

Ezy Lime was generally maintaining records to demonstrate compliance with relevant requirements. Records reviewed during the audit included:

- forward programs
- RMP
- ARRs
- FLRP
- ROBJ
- training records

- drilling records
- rehabilitation risk assessment
- environmental protection licence
- royalty lodgement
- deed of security deposit bond

3.2.14. Reporting on non-compliance

Clause 18 required the lease holder to provide the Minister with a written report detailing any non-compliance with any conditions of the mining lease, or a requirement of the Act or Regulation, relating to the mining activities.

It was noted non-compliances with Schedule 8A conditions were initiated by the Regulator. An official caution was issued to Ezy Lime on 26 September 2023 for the following sustained allegations:

- Not publishing the RMP on the website.
- Non-submission of ROBJ for approval prior to 1 March 2023.
- Non-submission of FLRP for approval prior to 1 March 2023.

Further non-compliance was identified during the audit. This non-compliance was noted in section 3.3.1 of this audit report. This may indicate Ezy Lime did not have robust systems in place for managing compliance requirements or identifying non-compliance.

3.2.15. Nominated contact person

Clause 19 required the lease holder to nominate a contact person for the mining lease and provide contact details for that person.

Ezy Lime nominated a contact person for ML1568 and was confirmed on 17 January 2023, but a written consent was not attached to the nominated contact person (NCP) records in the Regulator's portal. As suggestion for improvement 2, the NCP should lodge a new NCP application using the form provided in the Regulator portal, as the box which stated that 'the NCP take responsibility for receiving all email correspondences' for ML1568 was not checked in the previous NCP lodgement.

3.2.16. Modification of development consent

Clause 20 required the lease holder to give written notice to the Secretary within 10 days after making an application for modification of a development consent except if the development was a state significant development.

No modification to development consent DA 00110 was submitted during the audit period.

3.3. Reporting

3.3.1. Annual exploration reporting

Section 163C of the *Mining Act 1992* and clause 59 of the Mining Regulation 2016 required the preparation and submission of an annual report that provided full particulars of all exploration and other operations or activities conducted during the 12-month period.

Annual exploration reports were due for submission annually on 26 November. A check of departmental records confirmed that annual exploration reports for the 2024 and 2025 periods were not lodged with NSW Resources and there was no exemption or change in due date for these reports. This was raised as a non-compliance one. The Regulator issued an official caution for this non-compliance (LETT0008534). No further action is required. The 2024 and 2025 annual exploration reports have now been lodged through the TMS portal.

3.3.2. Annual rehabilitation reporting

Clause 13 of Schedule 8A required the lease holder to prepare and submit a rehabilitation report annually.

Annual rehabilitation reports for 2023 and 2024 were submitted for ML1568. The activities undertaken included:

- weed control
- inspection of water management structures.

4. Compliance management

4.1. Identifying compliance obligations

Identifying compliance obligations is a critical step in the development of an effective compliance management system. Compliance obligations for an exploration project can include:

- regulatory requirements (for example, the *Mining Act 1992*)
- conditions imposed on the grant, renewal, or transfer of exploration licences
- exploration activity approvals
- exploration codes of practice
- specific commitments made by the organisation (for example, commitments made in the approved exploration activity application).

Once identified, compliance obligations should be reviewed periodically to identify any changes in those obligations (for example, changes in legislation).

Ezy Lime had some understanding of the compliance requirements for ML1568. A consultancy firm was hired to manage the compliance submission requirements. However, non-compliances, observations of concern and suggestions for improvement were identified during the audit because Ezy Lime did not have clear systems and processes in place to manage their compliance obligations. This was raised as an observation of concern 6. Ezy Lime should develop systems or processes to manage their compliance obligations.

4.2. Contractor management

Contractors are often used to undertake specialist tasks, for example, exploration drilling. While the responsibility for compliance or the implementation of environmental controls is often passed to the contractor, the licence holder will retain accountability for compliance with its licence conditions and other compliance obligations. It is important that the licence holder exercises management control of its contractors by specifying contract requirements, providing oversight of contracted works, and evaluating the performance of the contractor during the contracted works.

The Lynton Limestone Quarry representative said contractors were used for drilling, mechanical and electrical activities and were all inducted via the mine's site induction process. Ezy Lime verified contractors' activities by obtaining copies of key records such as drill reports and blast reports that were uploaded to OneDrive to ensure contractor's compliance with their obligations. Verification competency testing and training completed by staff and contractors were sighted in hard copies.

4.3. Inspections, monitoring and evaluation

An effective inspection, monitoring and evaluation process is required to:

- monitor the implementation of the risk controls

- evaluate the effectiveness of those controls based on an assessment of inspection and monitoring data
- implement an adaptive management approach if monitoring shows that controls may be ineffective.

Copies of workplace inspection forms and site inspection action plans were sighted to confirm Ezy Lime had systems in place for inspection and monitoring of key risks controls. The NCP and production manager were notified on non-compliances or issues identified during site inspections and these issues were discussed during toolbox meetings.

5. Audit conclusions

Based on the evidence reviewed and observations made during the site inspection, it was concluded that mining activities carried out under ML1568 were fairly managed. One non-compliance was identified due to the lack of systems and processes in place to manage their compliance obligations. Six observations of concerns were identified. These concerns were of administrative and environmental nature and posed environmental and rehabilitation risks for the site.

One non-compliance, 6 observations of concern, and 2 suggestions for improvement were identified as summarised in Table 2, Table 3 and Table 4.

Table 2: Summary of non-compliances

Non-compliance number	Description of issue	Recommendation
1	Annual exploration reports were due for submission annually on 26 November. A check of departmental records confirmed that annual exploration reports for the 2024 and 2025 periods were not lodged with NSW Resources and there was no exemption or change in due date for these reports. This was raised as a non-compliance one.	The Regulator issued an official caution for this non-compliance (LETT0008534). No further action is required. The 2024 and 2025 annual exploration reports have now been lodged through the TMS portal.

Table 3 Summary of observations of concern

Observation of concern number	Description of issue	Recommendation
1	A search of the Minview database and department records confirmed that ML1568 overlapped with EL5323 and EL8928. Evolution Mining Pty Ltd was the holder of EL5323 and SRL OPS Pty Ltd was the holder of EL8928. The co-operation agreement condition was triggered for ML1568. No cooperation agreements were provided for review during the audit. The nominated contact person for Lynton Limestone Quarry then contacted Evolution Mining Pty Ltd and was decided that a cooperation agreement was not necessary because based on the licence strata, ML1568 and EL5323 do not coexist within the same depth interval. While the attempt to negotiate a cooperation agreement with EL5323 was satisfied, Lynton Limestone Quarry did not attempt to contact	Ezy Lime would need to make reasonable attempt to negotiate a cooperation agreement with SRL OPS Pty Ltd.

Observation of concern number	Description of issue	Recommendation
	SRL OPS Pty Ltd for EL8928 overlapped. This was raised as an observation of concern one.	
2	Unstable overburden materials were found on several areas of the quarry.	Ezy Lime should aim to stabilise all areas with overburden materials.
3	Sediment fencing on overburden areas were not properly installed.	Ezy Lime should repair and correctly install sediment erosion control structures to protect sensitive areas of the mine during rain events.
4	The bund surrounding the diesel storage tank in the laydown area contained debris requiring removal and no spill kits were available for managing potential diesel spills in other areas.	No further actions required. Corrective actions have been implemented.
5	Dirty water generated from the truck wash area lacked secondary containment and was discharged directly to land creating a potential contamination risk.	Ezy Lime was advised to consult with the NSW Environment Protection Authority or the appropriate regulatory authority to address the issue.
6	Non-compliances, observations of concern and suggestions for improvement were identified during the audit because Ezy Lime did not have clear systems and processes in place to manage their compliance obligations.	Ezy Lime should develop systems or processes to manage their compliance obligations.

Table 4: Summary of suggestions for improvement

Suggestion for improvement number	Description of issue
1	The ARR and forward program for Lynton Limestone Quarry were due for submission annually by 25 December each year. On 14 January 2025, a warning letter was issued to Ezy Lime for non-submission of the 2024 ARR and forward program due by 25 December 2024. Ezy Lime was given 30 days to comply with these requirements. On 24 January 2025, Ezy Lime submitted the 2024 ARR and forward program. As suggestion for improvement 1, it was recommended for Ezy Lime to review the requirements of clause 15 for preparation and timely submission of all required documentation to ensure compliance.

Suggestion for improvement number	Description of issue
2	Ezy Lime nominated a contact person for ML1568 and was confirmed on 17 January 2023, but a written consent was not attached to the nominated contact person (NCP) records in the Regulator's portal. As suggestion for improvement 2, the NCP should lodge a new NCP application using the form provided in the Regulator portal, as the box which stated that 'the NCP take responsibility for receiving all email correspondences' for ML1568 was not checked in the previous NCP lodgement.