8 June 2016

Department of Planning & Environment
GPO Box 39
SYDNEY NSW 2001

Attention: Mr Mike Young

Syerston Project Scandium Oxide Modification – Responses to Submissions

Dear Mr Young,

Scandium21 Pty Ltd (Scandium21), a wholly owned subsidiary of Clean TeQ Holdings Ltd (Clean TeQ), owns the rights to develop the Syerston Project (the Project) an approved nickel cobalt mining project. The Project is situated approximately 350 kilometres (km) west-northwest of Sydney, near the village of Fifield, New South Wales (NSW). Development Consent DA 374-11-00 for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act) in 2001.

Scandium21 prepared the *Syerston Project Scandium Oxide Modification Environmental Assessment* (the EA) to support a modification application under section 75W of the EP&A Act for adjusting the approved mining and processing operations to initially focus on scandium oxide (Sc_2O_3) production in addition to nickel and cobalt precipitate production (the Modification).

Responses to Submissions

A total of seven submissions were received for the Modification from the following stakeholders:

- NSW Department of Primary Industries;
- NSW Environment Protection Authority;
- NSW Roads and Maritime Services;
- NSW Office of Environment and Heritage;
- Division of Resources and Energy within the NSW Department of Industry;
- Lachlan Shire Council; and
- Parkes Shire Council.

None of the above stakeholders objected to the Modification.

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It is understood that the NSW Department of Planning and Environment has not received any other submissions (including from the Forbes Shire Council).

Scandium21's responses to the submissions received are presented in Enclosure 1.

If any additional information or clarification is required, please do not hesitate to contact me.

Kind Regards,

JOHN CARR
GENERAL MANAGER

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ENCLOSURE 1

RESPONSES TO SUBMISSIONS

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Table E1-1
Responses to Submissions

Number	Organisation	Submission	Scandium 21 Response
DPI-1	NSW Department of Primary Industries (DPI)	*... The initial phase will not impact on Crown land. The Full Production Phase, involving a large footprint when initiated, will impact on Crown land.* *Crown land Lot 7303 DP 1148889 (146ha) reserved for Future Public Requirements and Lot 7302 DP1148734 (101.9ha) reserved for the preservation of native flora and fauna will be impacted by an open cut pit and waste rock emplacement.* *DPI Lands & Natural Resources advise that reserved Crown Land Lot 7303 DP1148889 and Lot 7302 DP1148734 within the Project Approval area must be subject to a Compensation Agreement to be agreed and executed prior to any mining activity taking place on this land. The Compensation Agreement will require purchase of Crown land impacted on by mining activity. If necessary the Applicant, Scandium21 Pty Ltd should deal with Native Title via Non-Claimant Application and any Aboriginal Land Claims via Deed of Agreement.*	Acknowledged. Scandium21 Pty Ltd (Scandium21) would execute a Compensation Agreement with Crown Lands and Natural Resources for the use of Lot 7303 DP 1148889 and Lot 7302 DP 1148734 prior to any mining activity taking place on this land. It is noted that no mining activities would be required on this land during the Initial Production Phase of the modified Project.
DPI-2	DPI	*The water demand for the modified initial phase of production is stated in the EIS* [EA] *to be significantly lower than the maximum of 17.5ML/d for the approved project. The actual demand volumes of this initial phase are not detailed and it is not clear whether the current borefield is sufficient to meet this demand.* *The proponent has a current entitlement at a borefield in the Upper Lachlan Alluvial (Zone 5) Groundwater Source of 3154 unit shares. This represents a maximum volume to be extracted of approximately 8.64ML/d, however it is not detailed whether the borefield has the capacity to supply this volume or how impacts on existing users and the environment are mitigated.*	Condition 4.1.1(k), Schedule 2 of Development Consent DA 374-11-00 limits extraction from the water supply borefield to 17.5 megalitres per day (ML/day). The Initial Production Phase of the modified Project would require up to 1.75 ML/day which is significantly lower than water demand of the approved Project (i.e. 17.5 ML/day) and is well within Scandium21's existing volumetric licences (i.e. 8.64 ML/day). Coffey Geosciences (2000) prepared the *Water Supply Borefield – Hydrogeological Investigation* (including pump tests and modelling) for the Project and it concluded that the water supply borefield would be capable of supplying the required yield (i.e. 17.5 ML/day) over the Project life. In accordance with Condition 4.1.1(k), Schedule 2 of Development Consent DA 374-11-00, Scandium21 would include amelioration measures for potentially impacted groundwater users in the Borefield Impact Management Plan to the satisfaction of the DPI-Water.

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Table E1-1 (Continued)
Responses to Submissions

Number	Organisation	Submission	Scandium 21 Response
DPI-3	DPI	*The proponent currently does not have adequate entitlement to supply the maximum water demand of 17.5ML/d (approx. 6385ML/yr). It is recommended the proponent consider the market depth and the capacity of the borefield to obtain the necessary water entitlement for water supply. Additional groundwater assessment and development of mitigation and contingency options will be required if additional entitlement is to be traded to the existing borefield. The proponent may be required to consider alternative water supply options such as additional borefields or access from the regulated Lachlan River to meet the maximum water demand.*	Acknowledged. As described in Section 4.2.1 of the Environmental Assessment (EA), Scandium21 would obtain and hold appropriate volumetric licences in accordance with the relevant Water Sharing Plan. Scandium21 currently holds sufficient volumetric licences (i.e. 8.64 ML/day) to supply the Initial Production Phase of the modified Project. Additional volumetric licences would however need to be obtained and held prior to the Project water demand exceeding 8.64 ML/day.
DPI-4	DPI	*The EIS* [EA] *refers to water to be sourced internally from runoff, however the volume potentially available has not been detailed.*	As described in Section 2.10.2 of the EA, the site water management system would be generally unchanged from the approved Project. In accordance with Condition 4.1(a), Schedule 2 of Development Consent DA 374-11-00, Scandium21 would prepare a Site Water Management Plan that would include the management of the quantity and quality of surface water at the Mine and Processing Facility (MPF) site to the satisfaction of the DPI-Water. Scandium21 would obtain and hold appropriate volumetric licences in accordance with the relevant Water Sharing Plan for surface water runoff collected on-site (if required).
DPI-5	DPI	*The EIS* [EA] *indicates the proposed multiple pits are not expected to intercept groundwater. However no additional groundwater assessment or interpretation of monitoring results has been provided to support this.* *The original EIS referred to minimal groundwater inflows to be encountered in the pits and if groundwater inflows did occur it would be pumped out for use in the process plant or allowed to evaporate. This has not been considered further in the current EIS* [EA] *and has not been assessed in terms of the requirements of the NSW Aquifer Interference Policy. The proponent will be required to hold sufficient entitlement to account for groundwater take in the pits either via pumping or inflows. The proponent currently does not hold any water entitlement in the water source where the pits may encounter groundwater, which is the Lachlan Fold Belt MDB Groundwater source.*	The approved Project includes the development of two large open cut pits that will be up to approximately 55 metres (m) deep and have a combined footprint of approximately 410 hectares (ha). Groundwater inflows into the open cut pits is expected to be negligible as the floor of the open cut pits will not intersect the local groundwater table (Black Range Minerals, 2000). Observations during exploration drilling activities undertaken at the MPF site are consistent with this conclusion (i.e. no groundwater has been intersected during drilling activities). The Initial Production Phase of the modified Project would include the development of multiple small-scale open cut pits that would be up to approximately 30 m deep and have a combined footprint of approximately 35 ha.

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DPI-5 (cont.)	DPI		These small-scale open cut pits would be either incorporated into the larger approved open cut pits or backfilled during the Full Production Phase. It is therefore considered that the Modification would not result in significant changes to the approved groundwater impacts of the Project. Given the smaller scale (footprint and depth) of the Initial Production Phase open cut pits relative to the approved open cut pits, it is expected that groundwater inflows during the Initial Production Phase would be negligible (i.e. as per the approved Project). Notwithstanding the above, Scandium21 would prepare a Site Water Management Plan that would include the management of the quantity and quality of groundwater at the MPF site to the satisfaction of the DPI-Water in accordance with Condition 4.1(a), Schedule 2 of Development Consent DA 374-11-00. Scandium21 would obtain and hold appropriate volumetric licences in accordance with the relevant Water Sharing Plan for groundwater inflows into the open cut pits (if any).
DPI-6	DPI	*Sediment and erosion control during construction and operation will be key issues for the project. It is expected this would be addressed through relevant management plans and in accordance with industry standards, eg. Managing Urban Stormwater: Soils and Construction (Landcom 2004).*	In accordance with Condition 4.2(a), Schedule 2 of Development Consent DA 374-11-00, Scandium21 would prepare an Integrated Erosion and Sediment Control Plan in accordance with the requirements of *Managing Urban Stormwater: Soils and Construction* to the satisfaction of the DPI-Water.
DPI-7	DPI	*The proponent detail the water supply demand for the initial phase of production, the adequacy of existing water supply options to meet these demands and also for the maximum project demand. This is to include history of water extraction from the borefield and pump tests where available.*	Refer to Response DPI-2.

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DPI-8	DPI	*The proponent examines the availability of water entitlement in the relevant water source to consider potential water trade requirements to meet the maximum demands of the project at full production. Where a trade is proposed additional groundwater assessment is required to assess the impacts to local water users and the environment. This may require drilling and testing of additional bores, assessment of existing history of extraction/pump tests, drawdown modelling and development of mitigation and contingency options such as trigger levels and make good provisions.* *The proponent develops alternative water supply options where the current sources are inadequate for the project.*	Refer to Response DPI-3.
DPI-9	DPI	*The proponent completes an assessment of the open cut pits for the initial phase and the total project in accordance with the NSW Aquifer Interference Policy. The proponent will be required to hold sufficient water entitlement to account for the groundwater take prior to this take occurring.*	Refer to Response DPI-5.
DPI-10	DPI	*The design, construction and operation of the diversion structures and watercourse crossings need to be in accordance with the "Guidelines for Controlled Activities on Waterfront Land (DPI Water 2012)".*	The Modification would not require any changes to the approved diversion structures (Section 2.10.2 of the EA). In accordance with Condition 4.1(a), Schedule 2 of Development Consent DA 374-11-00, Scandium21 would prepare a Site Water Management Plan that would include details of the design and maintenance of the diversion structures to the satisfaction of the DPI-Water.
DPI-11	DPI	*The proponent must prepare a Water Management Plan in consultation with DPI Water prior to commencement of activities. This is to address the site water balance, water demands and sources, water metering and monitoring, borefield management, sediment and erosion control, pipeline installation and watercourse diversions.*	In accordance with Condition 4.1(a), Schedule 2 of Development Consent DA 374-11-00, Scandium21 would prepare a Site Water Management Plan to the satisfaction of the DPI-Water.

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Table E1-1 (Continued)
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EPA-1	NSW Environment Protection Authority (EPA)	*An open cut pit is proposed to be developed across an unnamed watercourse that crosses Wilmatha and Melrose Plains Roads, and bisects Fifield State Forest, as shown in Figure 3 of the EA. The EPA notes that a water diversion structure is located upstream on this watercourse, and a sediment basin is being proposed to be developed downstream adjacent to Fifield State Forest boundary. Modification 3 also provides for the installation of sediment basins to be placed adjacent to four proposed waste rock emplacements. Limited details are provided on design or capacity of the water diversion structures and sediment basins.* *Further detail is required in regard to the design and construction of water diversion and sediment control measures to ensure they will be designed and constructed to be consistent with the requirements of Managing Urban Stormwater Volume 1 (the Blue Book), and Volume 2E: Mines and Quarries.*	The approved diversion structures will be designed to convey peak flows from a 1 in 100 average recurrence interval (AR)I rainfall event. The diversion structures will generally comprise a gently sloping grassed invert and steeper section will be armoured. The Modification would not include any changes to the approved diversion structures and only minor changes to sediment dams during the Initial Production Phase. Details of the design and maintenance of the diversion structures and sediment dams would be included in the Site Water Management Plan in accordance with Condition 4.1(a), Schedule 2 of Development Consent DA 374-11-00. In addition, an Integrated Erosion and Sediment Control Plan consistent with the requirements of *Managing Urban Stormwater: Soils and Construction* (including Volumes 1 and 2E) would be prepared in accordance with Condition 4.2(a), Schedule 2 of Development Consent DA 374-11-00. Scandium21 would obtain an Environment Protection Licence for the Project.
EPA-2	EPA	*Modification 3 proposes installation of a sediment basin adjacent to the MPF infrastructure area and ROM Pad. Clarification is required in relation to the purpose of this sediment basin and whether it is intended to contain process plant runoff, that is, contaminated water runoff or sediment laden runoff. Limited details are provided in relation to surface water management around the infrastructure area and ROM Pad and separation of clean, dirty and contaminated runoff. Further information is required in relation to separation of clean, dirty and contaminated water, including locations and proposed construction details of all proposed structures.* *Further information is required in relation to design and construction details of all water diversion drains and containment structures to ensure they will be designed and constructed in accordance with the Blue Book Volumes 1 and 2E (for clean and dirty water catchment areas) or proposed design details for all structures associated with contaminated catchment areas.* *Additional information should also be provided on the adjacent sediment basin, including design, capacity, and characteristics of receiving water.*	The water storage structure adjacent the MPF infrastructure area and ROM pad would collect runoff from the MPF infrastructure area (including the processing plant) and the ROM pad area. Consistent with the approved water management system, this water would be reused in the processing plant. Details of the design and maintenance of all storages, diversion structures, sediment dams would be included in the Site Water Management Plan in accordance with Condition 4.1(a), Schedule 2 of Development Consent DA 374-11-00. In addition, an Integrated Erosion and Sediment Control Plan consistent with the requirements of *Managing Urban Stormwater: Soils and Construction* (including Volumes 1 and 2E) would be prepared in accordance with Condition 4.2(a), Schedule 2 of Development Consent DA 374-11-00. Scandium21 would obtain an Environment Protection Licence for the Project.

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Table E1-1 (Continued)
Responses to Submissions

Number	Organisation	Submission	Scandium 21 Response
EPA-3	EPA	*The proposed TSF and Evaporation Pond is of a reduced size than proposed in the original consent. The EPA notes that the evaporation ponds are to be designed to meet a 1 in 100 year annual recurrence interval. Limited information has been provided on design or construction details of the smaller TSF or Evaporation Pond, specifically in relation to whether it will be constructed to meet a 1 in 100 year annual recurrence interval and lining requirements for the TSF to prevent seepage and pollution of groundwater.* *Additional details are also required in relation to the design and construction details of both the TSF and Evaporation Pond, including how these structures will meet EPA's liner permeability requirements. Further information is required on whether the TSF and Evaporation Pond will be lined to achieve a permeability of 1 X 10^{-9} metres per second (m/s) or less with a re-compacted clay liner of at least 90 centimetres (cm) in thickness.* *Where the proposed liner will not meet this thickness and the natural geology of the site in conjunction with constructed clay liners is considered sufficient in meeting this requirement, sufficient evidence must be provided in support of this to demonstrate the construction will be adequate to prevent pollution of groundwater.*	As described in Section 2.9.2 of the EA, the tailings storage facility and evaporative system during the Initial Production Phase would be smaller than the approved tailings storage facility and evaporative system due to the lower production rate. The modified evaporative system during the Initial Production Phase would however provide appropriate storage capacity for the tailings storage facility rainfall event design criteria (i.e. 1 in 100 year ARI). The tailings storage facility and evaporative system would be developed to the approved size during the Full Production Phase. The tailings storage facility and evaporative system would be constructed in accordance with Condition 5.3, Schedule 2 of Development Consent DA 374-11-00 that requires (amongst other things): • the tailings storage facility must be constructed to the requirements of the EPA; • the tailings storage facility and evaporative system must be designed and operated to: ▪ ensure that any seepage of tailings water to the groundwater is contained within the boundary of the premises; ▪ to minimise seepage of tailings water though the base and side walls; • the tailings storage facility and evaporative system design must incorporate a base liner of either 900 millimetres (mm) of clay or modified soil with a permeability of no more than 1 x 10^{-9} metres per second (m/s) (or equivalent) or a synthetic (plastic) liner of 1.5 mm minimum thickness with a permeability of no more than 1 x 10^{-14} m/s (or equivalent) across the whole area of the tailings storage facility and evaporative system; • the tailings storage facility and evaporative system must not be commissioned until a report has been first obtained from an independent, suitably qualified and competent person, approved by the EPA, certifying that: ▪ a low permeability liner has been installed in accordance with Condition 5.3(c), Schedule 2 of Development Consent DA 374-11-00;

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Table E1-1 (Continued)
Responses to Submissions

Number	Organisation	Submission	Scandium 21 Response
EPA-3 (cont.)	EPA		▪ the low permeability liner installed has a permeability which meets the permeability design criteria at any point in the liner agreed in consultation with the EPA when tested with liquor similar of characteristics as the proposed tailings decant liquor; and ▪ the structures are structurally sound throughout their design life. The hydrogeological studies undertaken for the approved Project indicated that seepage from the tailings storage facility and evaporative system is likely to have negligible impact on existing groundwater levels or quality (Black Range Minerals, 2000). As the same design concepts would be adopted for the modified Project, negligible impact on existing groundwater levels or quality is also expected for the modified Project.
RMS-1	NSW Roads and Maritime Services (RMS)	*Prior to operation of the initial production phase, a Basic Right (BAR) turn treatment as shown in Figure 7.5 Part 4A Austroads Guide to Road Design (copy enclosed) is to be provided in Henry Parkes Way at its intersection with Middle Trundle Road. The widened shoulder is to be sealed and built for a 100km/h speed environment to provide a reasonable level of safety for traffic turning right into Middle Trundle Road and to allow following traffic an area to pass the right turning vehicle on the left hand side.*	The Road Transport Assessment (Appendix A of the EA) prepared by GTA Consultants (2016) includes an assessment of the forecast cumulative traffic movements during the Initial Production Phase of the modified Project at the intersection of Henry Parkes Way and the Middle Trundle Road against the Austroads (2013) warrants for rural road intersection treatments. GTA Consultants (2016) concluded that the existing Basic Auxiliary Right treatment is sufficient for the Initial Production phase of the modified Project. GTA Consultants (2016) did however recommend that the shoulders be sealed as part of ongoing maintenance activities. Given the above, Scandium21 proposes that the sealing of the shoulders be conducted as part of ongoing maintenance. Scandium21 would contribute to the funding of these road upgrades via its road maintenance contribution component of the Voluntary Planning Agreement (VPA) framework (attachment 2 of the EA).
RMS-2	RMS	*A formal agreement in the form of a Works Authorisation Deed (WAD) is required between the developer and Roads and Maritime for the developer to undertake "private financing and construction" of any works on Henry Parkes Way. This agreement is necessary for works in which Roads and Maritime has a statutory interest and must be in place prior to road works commencing.*	Noted.

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Table E1-1 (Continued)
Responses to Submissions

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RMS-3	RMS	*Safe Intersection Sight Distance (SISD) requirements outlined in Part 4A Austroads Guide to Road Design and relevant Roads and Maritime supplements is to be provided and maintained in both directions at all intersections that form part of the heavy and light vehicle access routes. For a 100 km/h speed zone the minimum SISD is 262 metres.*	The Road Transport Assessment (Appendix A of the EA) includes an assessment of the forecast cumulative traffic movements during the Initial Production Phase of the modified Project at relevant intersections against the Austroads (2013) warrants for rural road intersection treatments and recommended upgrades where relevant. The road upgrades proposed for the Initial Production Phase of the modified Project (Section 2.14.2 of the EA) would be undertaken in accordance with the Austroads guidelines.
RMS-4	RMS	*Prior to commencement of construction works, the proponent is to contact Roads and Maritime's Traffic Operations Coordinator to determine if a Road Occupancy Licence (ROL) is required. In the event that an ROL is required, the proponent will obtain the ROL prior to works commencing within three metres of the travel lanes in Henry Parkes Way.*	Noted.
RMS-5	RMS	*A Transport Management Plan (TMP) is to be developed in consultation with Lachlan and Parkes Shire Councils and Roads and Maritime Services, for each phase and/or stage of mining operations. The TMP is to include an analysis of the impacts of mine related commuter and haulage traffic and identify the risks of driver fatigue and poor driver behaviour. The TMP is to identify and address the risks of driver fatigue and behaviour and include measures and incentives to be employed to enforce, or at least encourage, mine staff to travel to and from work safely and/or reduce the exposure of mine staff to risks by minimising travel or providing safe travel options. The TMP is to demonstrate how safe interaction between mine related traffic and other road users on the public road network will be achieved.*	The Road Transport Assessment (Appendix A of the EA) assessed the potential impacts of the Initial Production Phase of modified Project and concluded that the Modification would not result in significant impacts on the safety of road network with the implementation of the proposed management and mitigation measures (e.g. road upgrades, road maintenance and the Traffic Code of Conduct). In accordance with Condition 7.1(a), Schedule 2 of Development Consent DA 374-11-00, Scandium21 would prepare a Traffic Code of Conduct. Scandium21 would identify and address the risks of Project-related driver fatigue and behaviour and include measures so that the Project workforce can travel to and from the Project safely.
OEH-1	NSW Office of Environment and Heritage	*Based on the information provided, the OEH has no specific comments to make on the proposed modification at this stage.*	Noted.
DRE-1	Division of Resources & Energy	*The Division supports the Syerston Project Modification 3 as a responsible utilisation of the State's mineral resources that will, if approved, provide employment for around 45 personnel at full operation and bring economic benefits to the local region and the State as a whole.*	Noted. The operational workforce during the Full Production Phase of the modified Project would remain the same as the approved Project (i.e. 300 personnel).

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LSC-1	Lachlan Shire Council (LSC)	*The EA provided states that the construction workforce would reside in the construction accommodation camp. Council's preference would be for some or all of these employees to be accommodated in towns and villages within the Lachlan Shire. Council currently provides this mine worker accommodation at its Condobolin Caravan Park. As a minimum Council would like to ensure that these construction camps are serviced by local companies.*	As described in Section 2.15.1 of the EA, the approved Project includes the construction of a construction accommodation camp to assist accommodate the construction workforce (estimated to average approximately 600 personnel and peak at 1,000 personnel). As the workforce for the Initial Production Phase of the modified Project would be smaller, no construction accommodation camp would be constructed during the Initial Production Phase of the modified Project (Figure 3 of the EA) and the workforce is expected to reside in surrounding towns. It is noted that the construction accommodation camp may be required for the construction phase for the Full Production Phase of the modified Project (Figure 4 of the EA). Scandium21 would consider the use of existing accommodation facilities prior to constructing the construction accommodation camp for the Full Production Phase.
LSC-2	LSC	*In relation to community enhancement contributions, Council is satisfied that this is dealt with in the Voluntary Planning Agreement (VPA) for which Council provides in-principle support.*	Noted.
LSC-3	LSC	*Since the previous modification was approved, the Fifield Waste Facility has been closed by Council.*	Noted.
LSC-4	LSC	*It is proposed not to construct the Fifield bypass (para 3, Page 10) during the initial production phase. This is supported as there are some possible minor economic benefits for businesses in Fifield to benefit from the passing traffic. The VPA has also outlined some intersection upgrades to be constructed as part of the Initial Production Phase in Slee Street, Fifield.*	Noted.

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LSC-5	LSC	*There appears to be a slight discrepancy between Table 3 page 19 and Figure 6b. In the figure, SR34 Wilmatha Road is coloured mauve and indicated as the extend of the road upgrade, additionally this road is included in the VPA document indicating that it requires upgrading. Yet Table 3 would seem to indicate that this road is not included in the Initial Production Phase. This is believed to be an oversight, and Table 6 would benefit from some additional descriptors to indicate the particular sections of road that are not included in the Production Phase, eg 'Wilmatha Road west of the access to the site".*	Wilmatha Road (SR34) between Slee St and the MPF access road would be upgraded consistent with Clause 3 of the VPA framework (Attachment 2 of the EA). This upgrade of Wilmatha Road is included in Road Upgrade 1 listed in Table 3 of the EA and shown on Figure 6b of the EA. The Wilmatha Road (Road Upgrade 6) in Table 3 of the EA is referring to the upgrade of Wilmatha Road to the north-west of the MPF access road. It is acknowledged that this could have been clearer in Table 3 of the EA. This section of Wilmatha Road is not proposed to be upgraded for the Initial Production Phase of the modified Project as it is no longer likely to be a key route between the MPF and Condobolin as Fifield Road (MR57) has recently been upgrades is now expected to be the key route between the MPF and Condobolin.
LSC-6	LSC	*SR64 Platina Road has not been included in Table 3 page 19 yet it is included in Figure 6b. This road is included in the VPA and also referenced in the Road Transport Assessment. It is understood from consultation meetings that SR64 Platina Road will be upgraded as part of the Initial Production Phase.*	Platina Road (SR64) would be upgraded consistent with Clause 3 of the VPA framework (Attachment 2 of the EA). The upgrade of Platina Road is included in Road Upgrade 1 and Intersection Upgrade 9 listed in Table 3 of the EA and shown on Figure 6b of the EA. Platina Road was not explicitly listed in Table 3 of the EA as Platina Road is not currently explicitly listed in Development Consent DA 374-11-00.
LSC-7	LSC	*The proposed re-assessments for the roads numbered 2, 5, 6 & 7 in Table 3 on page 19 are suitable to be completed prior to the Full Production Phase and it may well be found that the proposed upgrades are not required. This is acknowledged as a departure from the original proposal and is accepted by Council. The proposed VPA does however recommend as condition 5 that a road safety audit be completed, and that any works recommended from this audit be completed as stated in condition 6.The Road Transport Assessment completed by GTA consultants recommends the adoption of the road improvements which have been carried through into the VPA's. The increase in traffic associated with the proposed development is significant when compared with the volumes of traffic currently using the road, although as stated the total volume of traffic does not exceed the theoretical capacity of the road network.*	Noted.

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Responses to Submissions

Number	Organisation	Submission	Scandium 21 Response
LSC-8	LSC	*Figure 6-1a (page 21) shows that the water supply pipeline is proposed to be located on the Fifield bypass road, as this road is not proposed to be constructed until the Ultimate stage, Council would suggest that the pipeline may be located just south to the village of Fifield on the Gobondary Street road reserve.*	Noted.
LSC-9	LSC	*Council requests that a condition be imposed that empowers the VPA.*	Noted.
LSC-10	LSC	*Condition 5.4 a iv and b: Council suggests that the Waste Management Plan specifically identify proposed methods of disposal. If disposal is to be to the Condobolin Waste Facility, Council requests that the types and quantities identified by 5.4 i) be notified to Council prior to disposal.*	Acknowledged.
LSC-11	LSC	*Any dollar amounts referred to in the conditions should be indexed such that they represent the amount in current day terms.*	Noted.
LSC-12	LSC	*Condition 7.2 (b) specifically indicates that the Fifield bypass will be constructed at the expense of the applicant, although Council accepts that for the Initial Production Phase this bypass is not proposed to be completed.*	It is anticipated that the VPA (which includes relevant details of Fifield Bypass) will replace the requirement for Condition 7.5(b), Schedule 2 of Development Consent DA 374-11-00.
LSC-13	LSC	*Condition 7.2 (b) should be updated to amend the name of the Fifield to Wilmartha Road to Wilmartha Road (SR34)*	It is anticipated that the VPA (which includes the correct naming of Wilmatha Road) will replace the requirement for Condition 7.2(b), Schedule 2 of Development Consent DA 374-11-00.
LSC-14	LSC	*Condition 7.2 (g) has "agreed road work costs shall be lodged with LSC, PSC and LSC" where the last LSC should be FSC.*	It is anticipated that the VPA (which includes reference to the correct council) will replace the requirement for Condition 7.2(g), Schedule 2 of Development Consent DA 374-11-00.
LSC-15	LSC	*Council accepts that condition 7.5 (b) requirement to enter into a road maintenance agreement is somewhat complied with by virtue of the provision of the VPA and as such the VPA is required to be empowered.*	It is anticipated that the VPA (which includes a road maintenance agreement) will replace the requirement for Condition 7.5(b), Schedule 2 of Development Consent DA 374-11-00.

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Table E1-1 (Continued)
Responses to Submissions

Number	Organisation	Submission	Scandium 21 Response
PSC-1	Parkes Shire Council	*As you are aware Parkes Shire Council has been involved in extensive consultation for this project and has agreed to the terms of the proposed Planning Agreement as outlined in the assessment documentation.* *Parkes Shire Council has issued a letter to Scandium21 Pty Ltd outlining its terms in supporting the Planning Agreement (PA) and the proposed modifications (copy of letter attached).* *Parkes Shire Council requests the Planning Agreement be signed by all parties prior to determination of the modification application.*	It is anticipated that the terms of the VPA agreed to with the Parkes Shire Council will be included in any modified Development Consent DA 374-11-00 issued by the DP&E. It is therefore considered that the VPA would not need to be signed prior to the determination of the Modification.

References

Austroads (2013) *Guide to Traffic Management Part 3: Traffic Studies and Analysis.*

Black Range Minerals (2000) *Syerston Nickel Cobalt Project Environmental Impact Statement.*

Coffey Geosciences (2000) *Water Supply Borefield – Hydrogeological Investigation.*

GTA Consultants (2016) *Syserston Nickel Cobalt Project Scandium Oxide Modification Road Transport Assessment.*

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