

Mr Stephen O'Donoghue
Director – Resource Assessments
NSW Department of Planning, Housing and Infrastructure
4 Parramatta Square, 12 Darcy Street
PARRAMATTA NSW 2150

22 December 2025

Dear Stephen,

Re: Sunrise Scandium-Nickel-Cobalt Mine – Environmental Management Plans

Background

The Sunrise Scandium-Nickel-Cobalt Mine is an open cut mining and processing project situated approximately 350 kilometres west-northwest of Sydney, in New South Wales (NSW). Development Consent (DA 374-11-00) for the Sunrise Scandium-Nickel-Cobalt Mine was issued under Part 4 of the NSW *Environmental Planning and Assessment Act 1979* (EP&A Act) in 2001.

The Sunrise Scandium-Nickel-Cobalt Mine includes the establishment and operation of the following:

- mine and processing facility;
- limestone quarry;
- rail siding;
- borefield, surface water extraction infrastructure and water pipeline;
- gas pipeline;
- accommodation camp; and
- associated transport activities and transport infrastructure (e.g. the Fifield Bypass, road and intersection upgrades).

The Sunrise Scandium-Nickel-Cobalt Mine is approved to be staged with an initial stage focussed on scandium production (referred to as the Syerston Scandium Project [the Scandium Project]) with the option to expand through a second stage nickel-cobalt project if this option becomes economically viable in the future.

The Scandium Project is a smaller-scale operation compared to the second stage nickel-cobalt project and will involve preferentially mining scandium-rich areas to produce up to approximately 80 tonnes per annum (tpa) of scandium oxide. The Scandium Project includes the establishment and operation of the mine and processing facility; borefield, surface water extraction infrastructures and water pipeline; and associated transport activities and transport infrastructure. The Scandium Project does not require the development of the limestone quarry, rail siding, gas pipeline, or accommodation camp which are requirements of the second stage nickel-cobalt project.

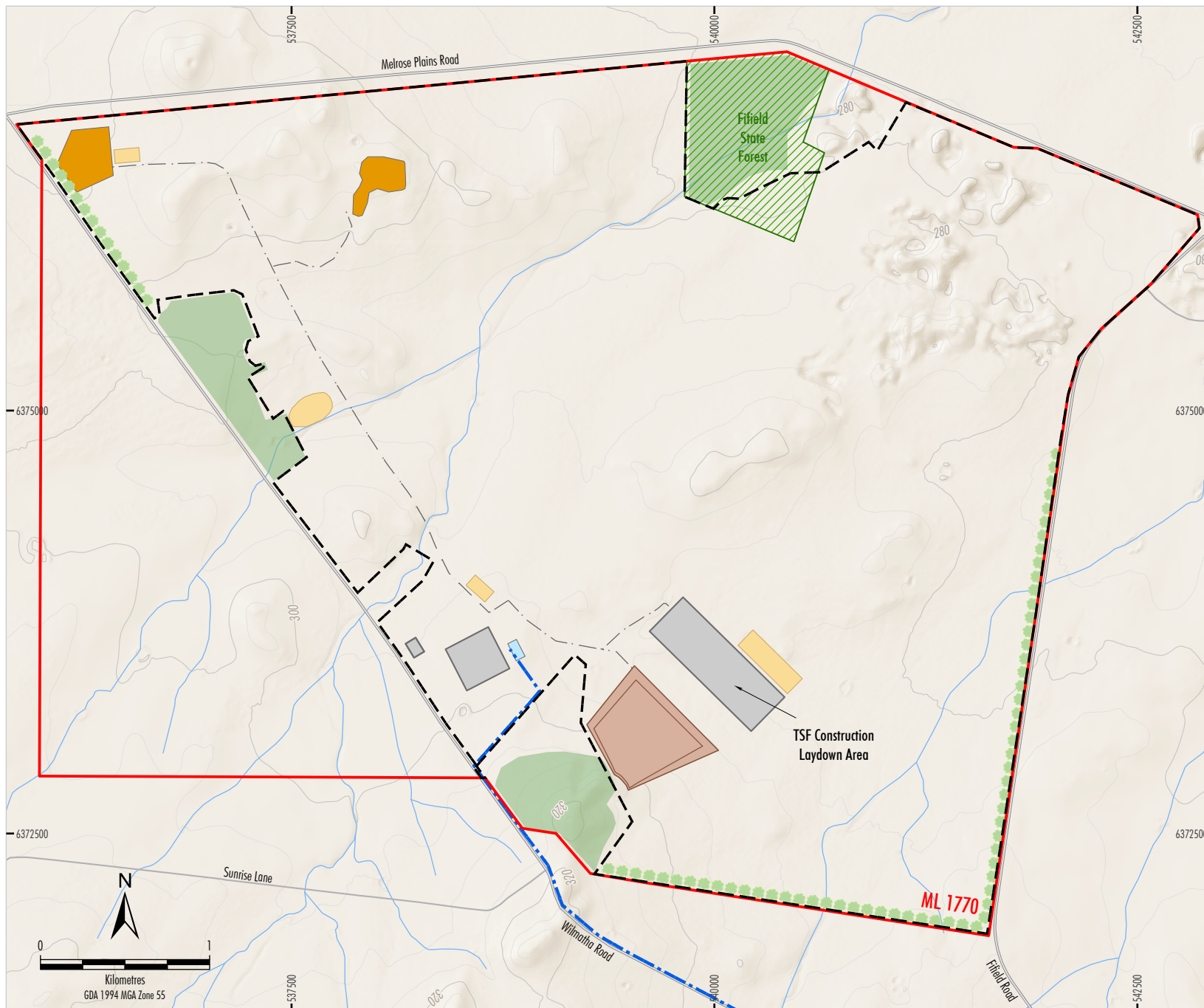
Condition 12, Schedule 2 of Development Consent (DA 374-11-00) allows for the submission of environmental management plans on a progressive basis with the approval of the Planning Secretary. Sunrise Energy Metals Limited (SEM) obtained the Planning Secretary's approval for the progressive submission of environmental management plans that included the initial construction activities for the second stage nickel-cobalt project in accordance with Condition 12, Schedule 2 of Development Consent (DA 374-11-00) on 5 July 2018.

SEM subsequently prepared the relevant environmental management plans for the initial construction activities for the second stage nickel-cobalt project (including the required consultation) and obtained approval for these environmental management plans.

Environmental Management Plan Staging – Scandium Project Initial Construction Activities

SEM is planning to commence initial construction activities for the smaller scale Scandium Project in 2026, which will include the following key activities:

- development of the mine (Figure 1), including:
 - site establishment and earthworks;
 - construction of site access roads and haul roads;
 - processing facility earthworks;
 - establishment of temporary facilities required for construction activities (e.g. offices, lay down areas, communications infrastructure);
 - construction of the mine infrastructure area including the offices, workshops, warehouse, laboratory and amenities buildings, fuel storage areas, communications infrastructure, potable water treatment plant and car parking facilities;
 - diesel generators and associated power distribution infrastructure;
 - construction of the tailings storage facility and evaporation pond;
 - construction and operation of water management infrastructure including the raw water dam, water storage dam and sediment dams;
 - construction and operation of the concrete batch plant;
 - development of gravel and clay borrow pits (including blasting and crushing);
 - installation of appropriate fencing and barriers for public safety and security; and
 - other associated minor infrastructure, plant, equipment and activities.



- LEGEND**
- State Forest
 - Project**
 - Mining Lease Boundary (ML)
 - Mine and Processing Facility Surface Development Area
 - Borrow Pit
 - Tailings Storage Facility
 - Soil Stockpile
 - ROM Pad
 - Mine Infrastructure Area
 - Sediment Dam
 - Haul Road
 - Vegetation Screening
 - Existing Open Woodland to be Maintained
 - Water Pipeline

Source: Scandium21 (2016); NSW Spatial Services (2025)



SYERSTON SCANDIUM PROJECT
Approved Mine and Processing Facility
General Arrangement
(Initial Construction Activities)

Figure 1

- exploration activities within the approved surface development area inside Mining Lease (ML) 1770 (Figure 1);
- development and operation of the borefield and water pipeline; and
- road upgrades.

The initial construction activities for the Scandium Project would not include construction of the surface water extraction infrastructure, accommodation camp, limestone quarry, rail siding or the gas pipeline.

SEM proposes to update the currently approved environmental management plans to incorporate the similar (but smaller scale) Scandium Project initial construction activities.

Action

Condition 12, Schedule 2 of Development Consent (DA 374-11-00) states:

With the approval of the Planning Secretary, the Applicant may submit any hazard study, strategy, plan or program required by this consent on a progressive basis.

...

With the agreement of the Planning Secretary, the Applicant may prepare any revised hazard study, strategy, plan or program without undertaking consultation with all the parties referred to under the relevant condition of this consent.

In accordance with Condition 12, Schedule 2 of Development Consent (DA 374-11-00), SEM requests the Planning Secretary's approval to continue to submit the environmental management plans on a progressive (staged) basis for the smaller scale Scandium Project initial construction activities described above.

SEM would submit revised environmental management plans for approval prior to commencing any development beyond the Scandium Project initial construction activities described above.

Furthermore, as only minor updates/changes to the approved environmental management plans will be required for the smaller scale Scandium Project initial construction activities (with the exception of the Traffic Management Plan and Road Upgrades and Maintenance Strategy), SEM proposes no additional consultation be undertaken with the relevant consultees.

SEM therefore requests the Planning Secretary's approval to update the approved environmental management plans (except for the Traffic Management Plan and Road Upgrades and Maintenance Strategy) without conducting additional consultation with the relevant consultees in accordance with Condition 12, Schedule 2 of Development Consent DA 374-11-00.

Please don't hesitate to contact me at the details below if you have any queries or wish to discuss.

Sincerely,



Bronwyn Flynn

Environment, Approvals and Community Lead

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