

Enquiries

Please ask for Theresa Folpp
Direct 02 6549 3700
Our reference Liddell Coal

01 August 2022

Tegan Cole
Senior Environmental Assessment Officer
Energy and Resource Assessments
Department of Planning and Environment

Dear Tegan

**Greater Ravensworth Area Water and Tailings Scheme Stage 2 Modification
Muswellbrook Shire Council Comments on Modification Report**

Reference is made to the following:

- Email from T.Cole dated 04/07/22 requesting Council comment on Stage 2 Greater Ravensworth Area Water and Tailings (GRAWTS) Modification Reports; and
- *'Greater Ravensworth Area Water and Tailings Scheme Modification, Modification Report for Ravensworth Operations Pty Limited, Liddell Coal Operations Pty Limited and Mt Owen Pty Limited'* (James Bailey and Associates, June 2022) (Modification Report).

Glencore Coal Pty Ltd (Glencore) manages several coal mines in the Upper Hunter region, including the Mount Owen Complex (MOC), Liddell Coal Operations (LCO) and Ravensworth Operations (RO). These operations are components of a mining precinct known as the Greater Ravensworth Area (GRA).

There are synergies between the Greater Ravensworth Area (GRA) operations including a network of water and tailings management infrastructure known as the GRAWTS.

Glencore proposes a modification to the planning approvals for MOC (SSD 5850), LCO (DA 305-11-01), and RO (PA 09_0176) to facilitate additional options and efficiencies for the transfer and storage of water and tailings. The Modification represents Stage 2 of the GRAWTS and includes the following:

- Transfer of tailings between mining operations;
- Disposal of additional tailings within the South Cut Void at LCO as part of rehabilitation activities until the end of 2050 (noting that there will be no change to end date for mining operations at LCO);
- Water management activities;
- Changes to the conceptual final landform for LCO to reflect the emplacement of tailings in the South Cut Void until the end of 2050;
- Continued use of existing LCO infrastructure to support rehabilitation activities until the end of 2050 (noting that there is no change to the end date for mining operations at LCO; and
- Construction and use of minor ancillary infrastructure.

Muswellbrook Shire Council (Council) staff appreciate the opportunity to comment on the Modification Report and its submission is as follows:

01. Council staff supports the use of an existing final void to reduce the need to establish new tailings emplacement areas and to improve rehabilitation and final landform outcomes.
02. A portion of the LCO consent boundary (DA 305-11-01) is within the Muswellbrook Shire Council (MSC) Local Government Area (LGA). Whilst Council staff support an improved final landform outcome by reducing the size of the existing void, extending the timeframe of DA 305-11-01 for rehabilitation activities until the end of 2050 to complete the emplacement of tailings within the South Cut Void will mean that the consent boundary will likely remain over portions of MSC LGA longer than what would have occurred had the Modification not been sought.
03. Clarification is required on whether Glencore will rehabilitate the remaining areas of LCO (other than areas utilised by the Modification) in a timeframe commensurate with what would have occurred had the Modification not been sought.
04. Council requests that the portion of LCO land within MSC LGA not used for the Modification is rehabilitated as soon as practicable, commensurate with the timeframe that would have occurred had the Modification not been sought.
05. Council requests that once the land within the MSC LGA has been relinquished from mining leases, the consent boundary for LCO (DA 305-11-01) be modified to include the Modification water and tailings management infrastructure only, as part of any future Modification to the consent.
06. The Modification Report states the following:
 - a. "Continued use of existing LCO infrastructure until the end of 2050" (Section 3.1); and
 - b. "Continued use of existing LCO infrastructure to support rehabilitation activities until the end of 2050" (Executive Summary).Clarify whether other types of infrastructure will remain until the end of 2050 (other than those used to support the Modification). Please include a reference to surface infrastructure listed in Table 3-1 of the Modification Report.
07. The groundwater model assumes approval of the proposed Glendell Continued Operations Project. Section 4.8 of the Groundwater Impact Assessment states "If the Glendell Continued Operations Project was not constructed, then flow would likely be towards other final voids within Ravensworth Operations and/or Mount Owen Complex." Clarification is required on whether the groundwater model should be updated should the Glendell Project not be approved.
08. Section 6.1.3 of the Modification Report states that water monitoring program will be extended until the "completion of rehabilitation". The definition of rehabilitation completion is not clear, and it is assumed to be defined in the *'Form and Way: Rehabilitation objectives, rehabilitation completion criteria and final landform and rehabilitation plan for large mines'* (Resources Regulator, 2021), as follows:

The final phase of rehabilitation when a rehabilitation area has achieved the final land use for the mining area:

- *as stated in the approved rehabilitation objectives and the approved rehabilitation completion criteria*
- *for large mines – as spatially depicted in the approved final landform and rehabilitation plan.*

Rehabilitation areas may be classified as complete when the NSW Resources Regulator has determined, in writing, that rehabilitation has achieved the final land use following submission of the relevant application by the lease holder.

09. Although the Modification Report identifies that the footprint for the Proposed Additional Pipeline “occurs on land largely devoid of ecological values, and consists of grassland vegetation only, providing little to no habitat for threatened species”, there is some native vegetation adjacent. It is not clear whether the objectives and/or mitigation measures from the Biodiversity Management Plan will apply to the Modification (including controls for any clearing activities or removal of trees) or whether works will occur without any biodiversity controls at all.
10. Section 7.2 of the Modification Report states that “the Modification will continue and enhance the benefits of the GRAWTS, which include reducing the need for HRSTS discharges” however Section 5.6 of the Surface Water Impact Assessment states that “discharges under the HRSTS scheme will remain comparable to approved conditions”. Clarify whether the Modification will result in a reduction in HRSTS discharges.

Council staff appreciates the opportunity to comment and would be pleased to provide additional information if requested. Should you need to discuss the above, please contact Theresa Folpp, Development Compliance Officer on 02 6549 3700 or email council@muswellbrook.nsw.gov.au.

Yours faithfully



Sharon Pope
Director Environment and Planning