



Submissions Report

for the

Copi Mineral Sands Project



**Development
Application
No. SSD-41294067**

August 2025



ACKNOWLEDGEMENT

R.W. Corkery & Co. acknowledge and pay our respects to the Traditional Custodians of the lands in NSW and Australia on which our projects are located. We value the knowledge, advice and involvement of the Elders and extended Aboriginal community that contribute to our Projects and extend our respect to all Aboriginal and Torres Strait Islander peoples.





Submissions Report

for the

Copi Mineral Sands Project

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1. Introduction

This *Submissions Report* has been prepared by RW Corkery & Co Pty Limited (RWC) on behalf of RZ Resources Ltd (the Applicant) in relation to the Copi Mineral sands Project (the Project). This document provides responses to government agency, public and organisation submissions received during exhibition of the *Environmental Impact Statement* for the Project between 22 May and 18 June 2024.

The Applicant is seeking development consent to develop and operate an open cut mine for the extraction and processing of mineral sands to produce a variety of mine products. The proposed mine and its associated infrastructure would be located on grazing land within a Mine Site located approximately 75km northwest of Wentworth and 180km south-southwest of Broken Hill, within the Wentworth Local Government Area (LGA) (**Figure 1**).

During exhibition of the EIS, 47 public submissions were received, including 37 objecting to the Project. Wentworth Shire Council provided no comment and Broken Hill City Council did not object to the Project. Therefore, as the Applicant has not made a reportable political donation, the determining authority for the Project is the Minister for Planning and Public Spaces. It is understood that the Minister has delegated their powers to determine the Project to a senior officer of the Department of Planning, Housing and Infrastructure (DPHI).

During and following the exhibition of the EIS, the following matters have arisen which have necessitated changes to the Project as exhibited.

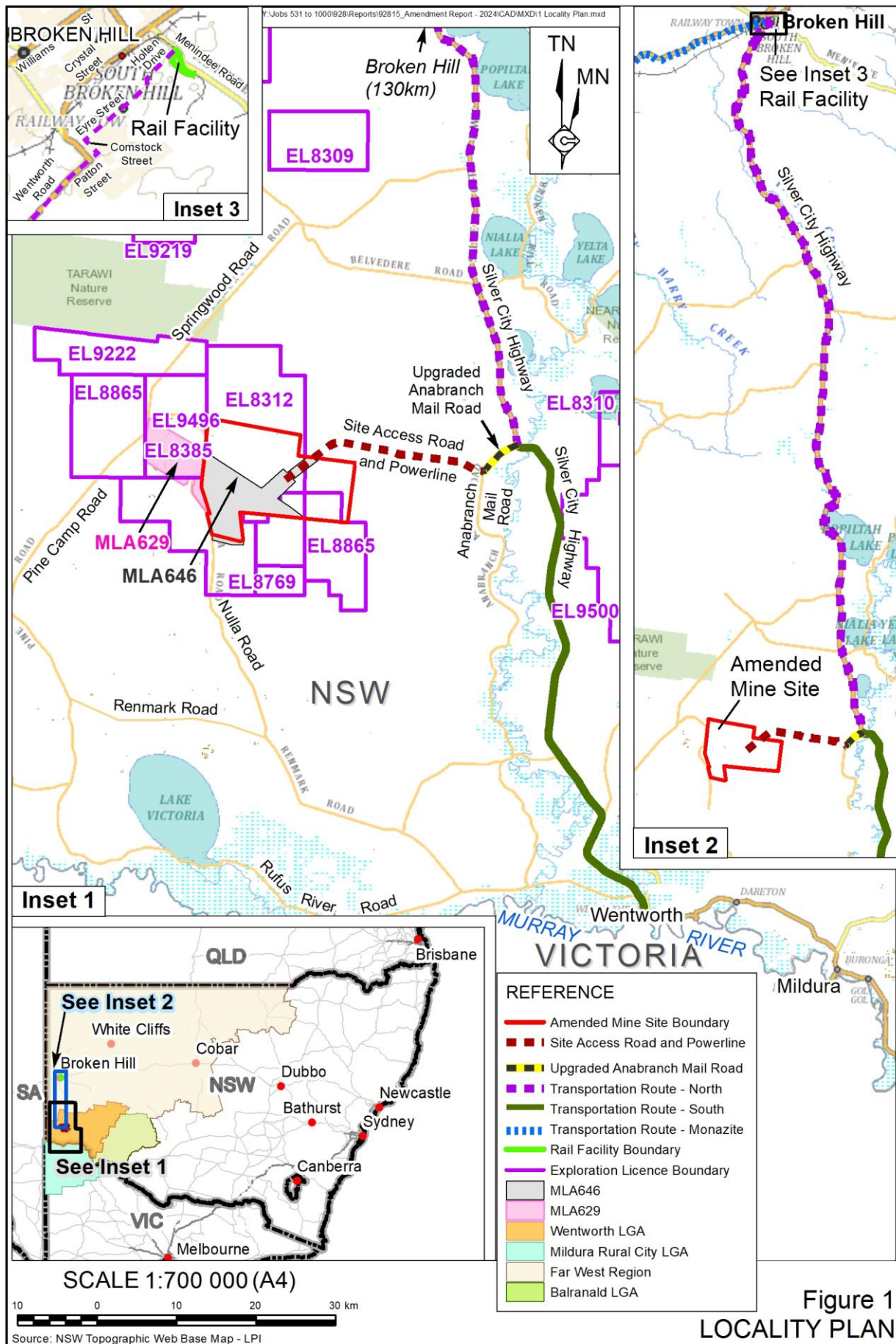
- Ongoing discussion with the owners surrounding land.
- Feedback from Transport for NSW in relation to the conceptual design of the intersection between the Silver City Highway and Anabranche Mail Road.
- Further analysis of the ore deposit and surrounding mineralisation and the proposed mining methodology which identified additional ore which may be economically extracted from within the initial mining areas on Warwick Station.
- Further consultation with transportation providers which identified the preference to directly transport the Monazite Product from the Mine Site to port in Adelaide.

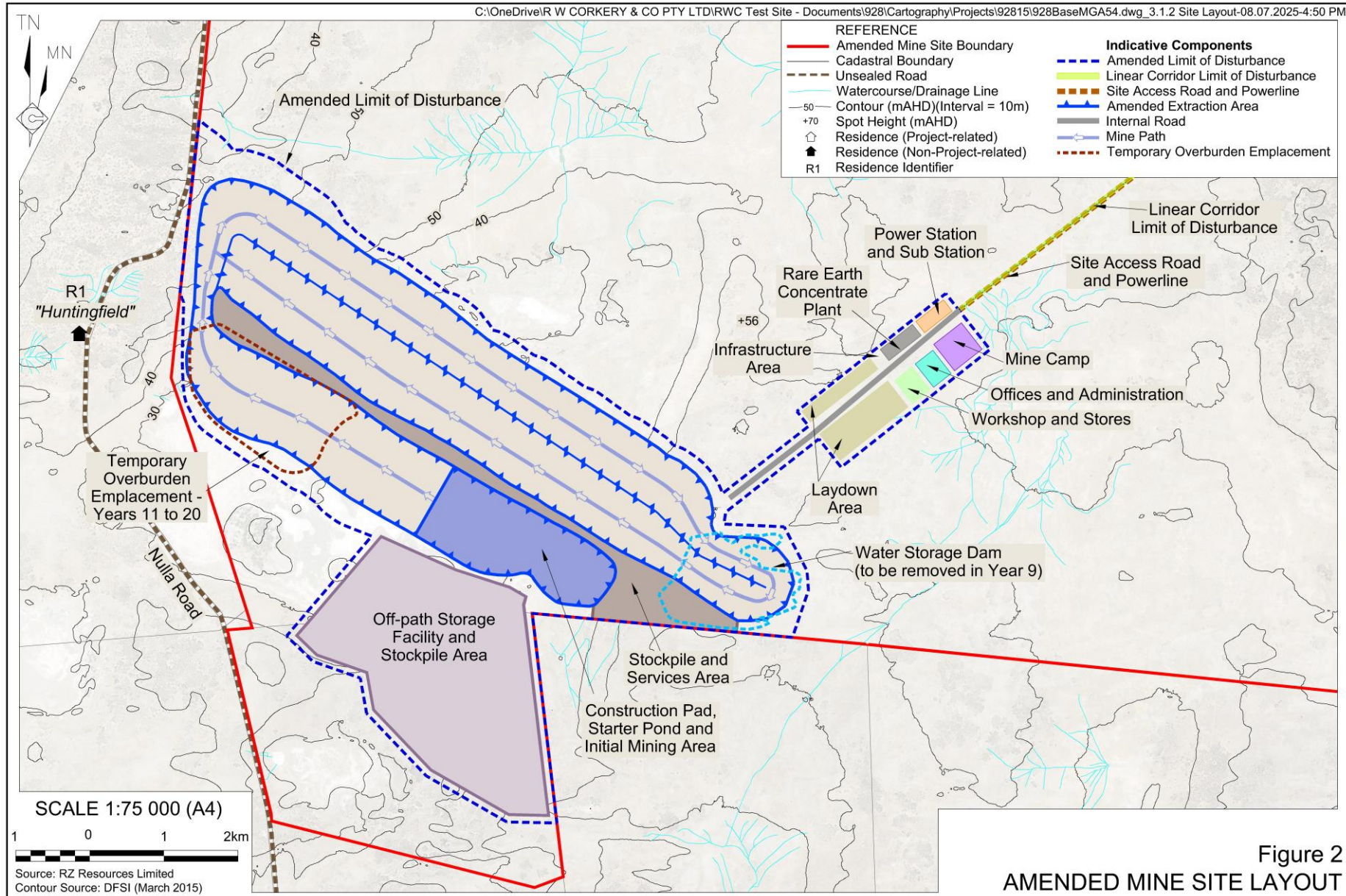
In light of the above, the Applicant proposes to amend the Project. An *Amendment Report* has been prepared to fully describe the amended Project and provide updated assessments of environmental impacts. The amended Project would comprise the following (**Figure 2**).

- Construction and use of an Infrastructure Area, including:
 - a Mine Camp for 200 people;
 - a diesel-powered Power Station (for construction operations and emergency backup only);
 - offices and administration facilities; and
 - workshops and stores.

- Open cut mining within Warwick and Nulla Stations using a combination of traditional dry (excavate, load and haul) and wet (dredging) mining techniques to extract up to approximately 46.8 million tonnes per annum (Mtpa) of overburden, 44.1Mtpa of interburden and 27.1Mtpa of ore.
- On-site processing of extracted ore using a floating Wet Concentrator and land-based Rare Earth Concentrate Plant to produce up to 475,000tpa of mine products.
- Transportation of mine products by road in sealed containers from the Mine Site to the Rail Facility via a Site Access Road, an upgraded Anabranche Mail Road and the Silver City Highway to Broken Hill. Up to 7,500tpa of Monazite Product would be directly transported by road to port in South Australia.
- Initial placement of overburden and reject into an Off Path Storage Facility until sufficient area within the dredge pond has been established. Following this, reject would be placed within completed sections of the dredge pond, with overburden used to cap the placed material and for construction of the final landform.
- Progressive establishment of a final landform that would, to the extent practicable, mimic the existing landform; and revegetation of that landform with native species to re-establish ecosystem function.
- Use of the existing Rail Facility in Broken Hill for the purposes of loading of mine product containers onto trains.
- The amended Project life would be 26 years, comprising:
 - 3 years of construction operations;
 - 18 years of mining; and
 - 3 years of rehabilitation.
- The Project would directly generate approximately 480 employment positions during construction and 240 employment positions during operations (unchanged from the Project as exhibited).

This document has been prepared in accordance with the *State significant development guidelines – preparing a submissions report* dated March 2024.





2. Analysis of Submissions

2.1 Summary

During and following the exhibition period for the EIS the following submissions were provided.

- 17 submissions from NSW and South Australian Government agencies, public authorities and local Councils;
- 4 non-government organisations; and
- 47 individuals, including one late submission that was provided directly to the Applicant and has been included here to ensure all community members were able to provide feedback on the Project

No form letters and no petitions were submitted.

2.2 Government Agencies, Public Authorities and Local Councils

The following Government agencies, public authorities and local Councils provided a submission. These submissions have been separately addressed in Section 4.

- Australian Rail Track Corporation.
- Broken Hill City Council.
- Biodiversity Conservation Services.
- Crown Lands.
- Department of Climate Change, Energy, the Environment and Water – Heritage NSW.
- Department of Climate Change, Energy, the Environment and Water – Water Group.
- Department of Primary Industries – Agriculture.
- Environment Protection Authority.
- Heritage Council.
- Mining Exploration and Geoscience.
- National Parkes and Wildlife Service.
- Resources Regulator.
- Rural Fire Service.
- SA Water.
- Transgrid.
- Transport for NSW.
- Wentworth Shire Council.

2.3 Individual and Non-government Organisations

Submissions were received from 47 individuals and 4 non-government organisations. DPHI has classified each of those submissions as either supporting, commenting on or objecting to the Project. **Table 1** presents an overview of all submissions received. To facilitate ease of reference for each submission, the Applicant has allocated a 4-digit code for each submission as follows.

- 1st digit.
 - P = public submission.
 - O = non-government organisation.
- 2nd digit
 - S = supporting submission
 - C = submission by way of comment
 - O = objecting submission
- 3rd and 4th digits – a two-digit numerical identifier in the order downloaded by RWC from the Major Project’s website.

As a result, submission PO01 is an objecting submission from a member of the public.

Table 1 presents all public and non-government organisation submissions addressed in this document. In summary:

- 9 submitters support the Project;
- 5 submitters made a comment only; and
- 37 submitters object to the Project.

Section 5 presents a categorisation of the issues raised by each of the public and non-government organisation submissions.

Table 1
Overview of Submissions

Identifier	Name	Location
Public Submissions		
Support		
PS01	Stef Golobic	National Community - Victoria
PS02	Ezio De Angelis	National Community - Victoria
PS03	Miah Spary	Local Community - Wentworth and Surrounds
PS04	Kerry Ross	Local Community - Wentworth and Surrounds
PS05	Withheld	Elsewhere
PS06	Withheld	Elsewhere
Comment		
PC01	Phil Larwood	Near Neighbour Landholders
PC02	Withheld	Local Community - Wentworth and Surrounds
PC03	Withheld	Local Community - Wentworth and Surrounds
PC04	Peter Family	National Community - Victoria
PC05	Belmore Farms	Direct Impact Landholders
Objection		
PO01	Withheld	National Community - Victoria
PO02	Withheld	National Community - Victoria
PO03	Greg Pollard	Local Community - Wentworth and Surrounds
PO04	Withheld	National Community - Victoria
PO05	Withheld	Near Neighbour Landholders
PO06	Drew Vagg	Direct Impact Landholders
PO07	Withheld	National Community - NSW
PO08	Withheld	National Community - Victoria
PO09	Withheld	Near Neighbour Landholders
PO10	Michele Bos	Near Neighbour Landholders
PO11	Melisa Kennedy	National Community - Victoria
PO12	Withheld	Local Community - Wentworth and Surrounds

Identifier	Name	Location
Public Submissions		
Objection		
PO13	Withheld	Local Community - Wentworth and Surrounds
PO14	Cara Beckton	Elsewhere
PO15	Withheld	Local Community - Wentworth and Surrounds
PO16	Nola Bennett	National Community - Victoria
PO17	Withheld	National Community - Victoria
PO18	James Robertson	Elsewhere
PO19	Withheld	Local Community - Wentworth and Surrounds
PO20	Mathew Duncan	Near Neighbour Landholders
PO21	Withheld	Elsewhere
PO22	Catherine Duncan	Local Community - Wentworth and Surrounds
PO23	Benjamin Pollard	Local Community - Wentworth and Surrounds
PO24	Ferna Vagg	Direct Impact Landholders
PO25	Withheld	Near Neighbour Landholders
PO26	Danny Mitchell	National Community - Victoria
PO27	Rachel Severn	National Community - Victoria
PO28	Withheld	National Community - Victoria
PO29	Alexander McLeod	Local Community - Wentworth and Surrounds
PO30	Shane Vagg	Direct Impact Landholders
PO31	Braidon Bennett	National Community - Victoria
PO32	Stuart Duncan	Local Community - Wentworth and Surrounds
PO33	Lee Pollard	Local Community - Wentworth and Surrounds
PO34	Withheld	Elsewhere
PO35	Michelle Vagg	National Community - Victoria
PO36	Adrian Hartley	National Community - Victoria

Table 1 (Cont'd)
Overview of Submissions

Identifier	Name	Location
Non-government Organisation Submissions		
Support		
OS01	Wentworth Mechanical	Local Community - Wentworth and Surrounds
OS02	IHC Mining	Elsewhere
OS03	Wentworth Grande Resort	Local Community - Wentworth and Surrounds

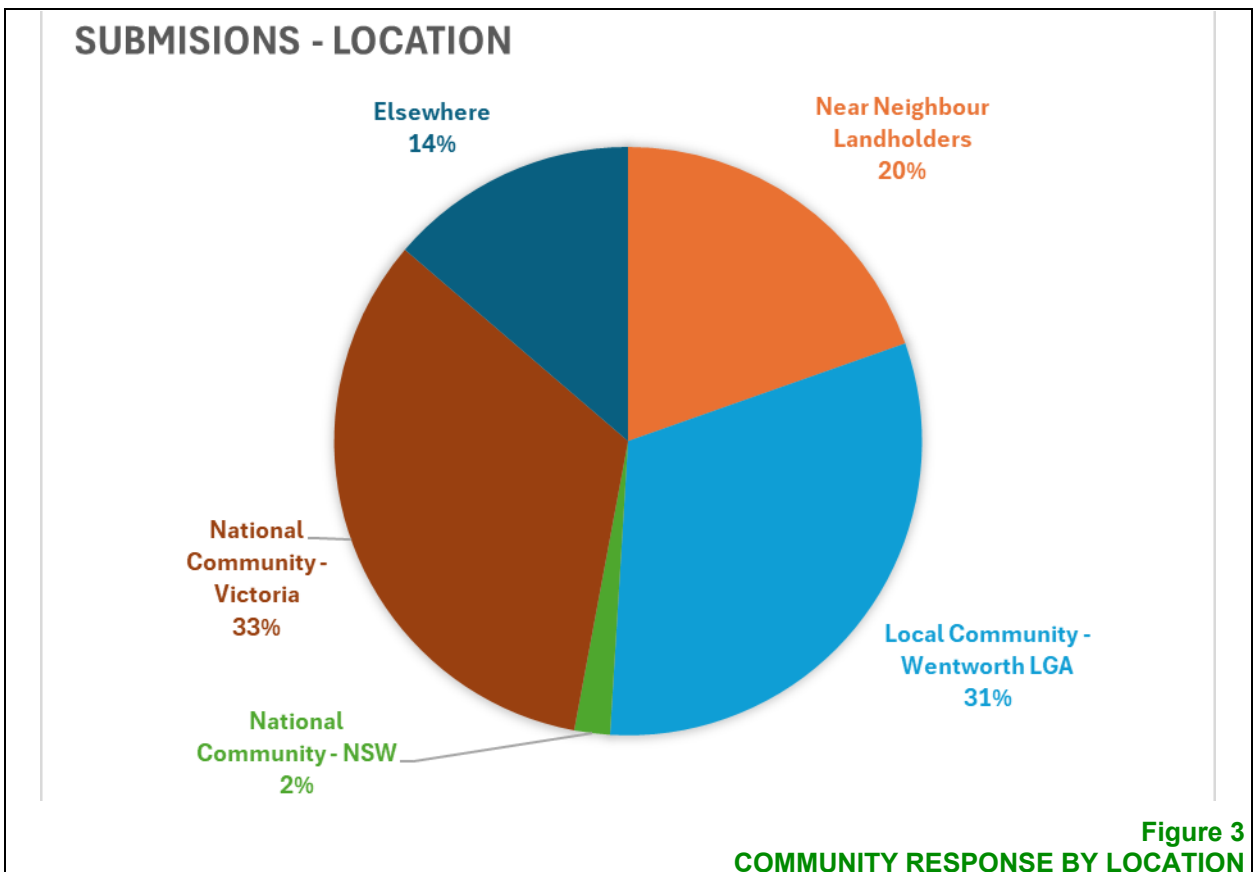
Identifier	Name	Location
Objection		
OO01	Bendigo District Environment Council	National Community - Victoria

In order to quantify the level of interest in the Project, the Applicant took the residence location information provided by each submitter and classified them as follows.

- Near neighbour landholders – namely those landholders adjacent to or in the vicinity of the Mine Site, including those whose land would be traversed by the Site Access Road.
- Local community – including those living within Wentworth LGA more distant to the Mine Site, in particular, those living within settlements closer to the Murray and Darling Rivers.
- National community – including those living elsewhere within NSW or within Victoria.
- Elsewhere – namely those living elsewhere in Australia or internationally or who did not provide a residence location.

Table 1 presents the location classification for each of the submitters and **Figure 3** presents an overview of the proportion of each classification. In summary:

- 20% of submissions were from direct or near neighbour landholders;
- 31% of submissions were from within the Wentworth LGA;
- 49% of submissions were from further afield, including Victoria (33%), Elsewhere (14%) and NSW (2%).



Key outcomes from the analysis of submissions are as follows.

- Approximately 10% of the non-government submitters were public organisations, whilst 90% were individuals.
- Approximately 17% of the submitters expressed support for the Project and 71% of the submitters expressed opposition to the Project. Approximately 12% of submitters provided comment only.
- The largest group of submitters came from Victoria with 33% of submissions, closely followed by the local community of the Wentworth LGA with 31% of submissions.
- Of the 10 submissions received from near neighbours, 8 objected to the Project as exhibited and 2 provided comment.
- Of the 16 submissions from the Wentworth community, 10 objected to the Project as exhibited, 4 supported the Project and 2 provided comment.
- Of the 26 submissions received from wider NSW, Victoria or elsewhere, 19 objected to the Project, while 5 expressed support, and 1 provided a comment.

3. Actions Taken Since Exhibition

3.1 Updated Mineral Resource

The Mineral Resource estimate for the Copi Mineral Sands deposit was updated in July 2024. **Table 2** presented the updated Mineral Resource. The Project would not fully extract the full mineral resource within the proposed Extraction Area. The Applicant anticipates submitting further applications for consent to extract additional material in the future.

Table 2
Estimated JORC-compliant Mineral Resource – July 2024

Resource Category	Million Tonnes	Total HM %	% of Total Heavy Mineral						Slimes %	Oversize %
			Ilmenite	Leucoxene	Rutile & HITI85	Zircon	Monazite	Xenotime		
Indicated	2,600	1.4	47	8.0	15	15	1.01	0.13	6.4	2.9
Inferred	400	1.0	46	8.2	16	12	0.84	0.11	7.0	3.7
Total	3,000	1.4	47	8.0	15	15	0.99	0.12	6.5	3.0
Resource Category	Million Tonnes	Total HM %	In-Situ Grade (%)						Slimes %	Oversize %
			Ilmenite	Leucoxene	Rutile & HITI85	Zircon	Monazite	Xenotime		
Indicated	2,600	1.4	0.66	0.11	0.22	0.21	0.01	0.002	6.4	2.9
Inferred	400	1.0	0.45	0.08	0.15	0.12	0.01	0.001	7.0	3.7
Total	3,000	1.4	0.63	0.11	0.21	0.20	0.01	0.002	6.5	3.0
Resource Category	In-Situ Tonnes (Kt)									
	Total HM	Ilmenite	Leucoxene	Rutile & HITI85	Zircon	Monazite	Xenotime	Total VHM		
Indicated	36,800	17,200	3,000	5,600	5,500	370	47	31,600		
Inferred	3,900	1,800	300	600	500	33	4	3,300		
Total	40,700	19,000	3,300	6,300	5,900	400	51	34,900		

Source: RZ Resources Limited (<https://rzresources.com/operations/reserves-and-resources/>)

3.2 Amending the Project

As identified in Section 1, during and following the exhibition of the EIS, a number of matters have arisen which have necessitated changes to the Project as exhibited. In order to fully describe the proposed changes, an *Amendment Report* has been prepared in accordance with the requirements of *State significant development guidelines – preparing an Amendment Report* dated October 2022. In the interests of limiting repetition, readers are referred to that document. However, the changes to the Project may be summarised as follows.

- Mining operations would be undertaken within Warwick and Nulla Stations only. Huntingfield, Sunshine and Belmore Stations would be removed from the Mine Site and no surface disturbing activities would be undertaken within those properties.

- The proposed intersection between the Silver City Highway and Anabranch Mail Road would be upgraded from the proposed Basic Auxiliary Right / Basic Auxiliary Left (BAR/BAL) to a Channelized Right / Axillary Left (CHR/AUL) intersection.
- Up to 7,500tpa of Monazite Product would be transported by road direct from the Mine Site to port in South Australia via Broken Hill and the Barrier Highway.

A range of minor adjustments have also been incorporated, including the following.

- An amended and widened Extraction Area, including an amended construction pad and starter pond, extraction of material underlying the Water Storage Dam and resulting amended material movement and mine product schedule.
- An amended Infrastructure Area layout, including relocation of fixed infrastructure.
- A reduction in the width of the Linear Corridor from 90m to 42m.
- The closure and relocation of Nulla Road would no longer be required.
- An amended final landform to reflect the amended Extraction Area and material movement schedule, with a backfilled final void in the western section of the amended Mine Site.

3.3 Further Assessment of the Amended Project

The proposed changes to the Project required further assessment of a range of environmental aspects, including updating of specialist consultant assessments. The updated specialist consultant assessments are presented in Appendices 4 to 16 of the *Amendment Report* and are summarised in Section 6 of that document.

3.4 Engagement Undertaken

Finally, the Applicant has undertaken a range of engagement activities following exhibition of the EIS. Section 5 of the *Amendment Report* provides an overview of the agency and community engagement undertaken since exhibition of the EIS.

3.5 Additional Actions Taken Since Exhibition

In addition to the matters identified above and described in the *Amendment Report* the following additional actions have been undertaken.

- Groundwater licencing
During Year 1 of mining operations, the amended Project would take up to a maximum of 7.8GL/year of hypersaline water from the Upper Aquifer. During steady state mining operations that take would be reduced to between 2,187ML/year and 2,874ML/year before decreasing to 846ML/year in Year 19. Groundwater take during Year 20 and after would be limited to that required for rehabilitation operations.

The Applicant applied for and was offered a controlled allocation of 7,890 shares under the Western Murray Porous Rock Groundwater Source, sufficient for the anticipated groundwater take for the Project. Concurrently, the Applicant entered into commercial negotiations with the holder of a large number of existing shares under that Plan. At the time of finalisation of this document Applicant was in commercial negotiations with the holder of those shares with a view to acquiring sufficient allocation from existing shares. As a result, the controlled allocation was not taken up. In the event that the negotiations currently underway are unsuccessful, the Applicant would reapply for a suitable allocation under the next Controlled Allocation Order under the *Water Management Act 2000*.

- Biodiversity offset strategy

In the event that the amended Project is approved, a range of biodiversity offset credits under the *Biodiversity Conservation Act 2016* will be required. The Applicant has engaged an expert in biodiversity offsets to assist it to identify suitable land for potential Biodiversity Stewardship Agreements. A range of discussions with the owners of suitable sites were in progress at the time of finalisation of this document.

- Feasibility Studies

Sections 3.4 and 3.5 of the amended Project Description presented as Appendix 1 of the *Amendment Report* describe the Project as it is currently understood. However, a range of additional studies and detailed mining planning and scheduling, process plant design and Project refinement studies have been undertaken since exhibition of the EIS and will continue throughout 2025 and 2026.

4. Response to Government Agency Submissions

4.1 Australian Rail Track Corporation

Representative Comment(s)

The New South Wales Government's Transport for NSW is the land owner for the railway lines across NSW. The rail corridor at the desired location of the loading facility is leased to the Australian Rail Track Corporation (ARTC). As such ARTC is responsible for reviewing developments, plans and policies adjoining the rail corridor to ensure any potential impacts of or on future rail operations are considered.

For RZ Resources to sub-lease the required land from ARTC, the project will be subject to the following conditions:

- 1) *RZ Resources is to obtain written approval from the appropriate Environmental Planning Approval Authority that they will enter into a sub-Lease for the loading facility. This agreement will govern the works in the rail corridor and the ongoing occupation of the infrastructure upon completion. ARTC will not agree to an easement over the rail corridor.*
- 2) *ARTC Fees (noting these are subject to change):*
 - a) *Application*
 - b) *Ongoing Licence rental fees*
 - c) *Project specific Third Party Review costs*
- 3) *Design, construction and corridor entry needs to be in accordance with:*
 - a) *ARTC Network Rules and Procedures including but not limited to RLS-PR-003.*
 - b) *ARTC Standards, Policies and Procedures.*
 - c) *Any relevant Australian Standards.*
 - d) *All relevant safety documentation including but not Safe Work Method Statement relating to working in the rail corridor*
- 4) *Special Conditions*
 - a) *Any works are not to have a negative impact on ARTC Operations*
 - b) *the works are not to have a negative hydraulic impact on ARTC property*
 - c) *Services Searches, surveys or other preliminary corridor entry to be conducted under separate ARTC approval.*

Response

The Applicant is currently in commercial negotiations with a third-party operator of the Rail Facility, ARTC and Broken Hill City Council in relation to use of the Rail Facility. The Applicant acknowledges the above and anticipates that each of the above matters will be addressed by either the third-party operator of the Facility or the Applicant prior to commencement of rail loading operations.

4.2 Broken Hill City Council

Representative Comment(s)

Council wishes to advise that it offers its general support to the proposal, however does request that the developer RZ Resources, enters into a Voluntary Planning Agreement with Broken Hill City Council in relation to the proposed public road upgrades which are required within the Broken Hill Local Government Area. These required road upgrades are outlined in the relevant section in the SEE and Traffic Report.

Response

The Applicant acknowledges Council's submission and has commenced negotiation of a suitable Planning Agreement with Broken Hill City Council to address the above matters. A draft Planning Agreement has been provided to Council and in-principal agreement has been received.

4.3 Biodiversity Conservation Services

4.3.1 Flood Risk Management

Representative Comment(s)

1. Quantitative flood modelling is required to inform the detailed design process.

The Surface Water Assessment does not include any quantitative flood modelling. Although BCS understands that the flood risk associated with the development are likely to be low, the proponent will need to complete detailed flood modelling in the detailed design process to ensure the infrastructure is appropriately located and sized to limit flood risk. The flood modelling should be used to inform emergency management issues related to site evacuation and access during floods as detailed in issue 2.

Recommendation:

1.1. Complete detailed flood modelling in the detailed design stage to appropriately locate and size infrastructure and to inform emergency management plans.

Response

Section 6.1.2.2 of the EIS identifies that the Mine Site is dominated by a series of internally draining depressions with no connection to local or regional creeks or rivers. Section 3.8.3.1 of the *Amendment Report* presents an assessment of surface water flows within each of the impacted catchments. In summary, under a 72-hour, 1% Annual Exceedance Probability rainfall event, water depths against the proposed surface water exclusion bunds would be less than 1m deep. Finally, Section 6.7.4.5 of the *Amendment Report* identifies that the Mine Site is not located within a flood planning area or a zone where inundation from floodwater could be expected to occur. Consequently, neither the development itself nor neighbouring properties would be adversely impacted by floodwater.

As a result, the Applicant disagrees that detailed flood modelling is required. Notwithstanding the above, the Applicant will consider extreme rainfall events when preparing the Emergency Response Management Plan for the Project.

Representative Comment(s)

2. The proponent has not consulted with the local Council and the NSW SES on emergency management related flood impacts

Table 2 of the Surface Water Assessment suggests that emergency management issues are 'Not applicable'. Given that there could be up to 480 workers onsite during construction and 240 during operation, and the site could be isolated from nearby population centres for weeks at a time during major floods, it is important that the proponent actively consult with the local council and the NSW SES to ensure that emergency management matters are discussed and supported. This consultation will be necessary to inform a site-specific flood emergency response plan. This plan should be informed by the detailed flood modelling as recommended above.

Recommendation:

2.1. Engage with the local council and the NSW State Emergency Service (SES) to discuss and agree emergency management matters, and to inform a site-specific flood emergency response plan..

Response

The Applicant notes that neither Wentworth Shire Council nor the NSW SES has raised emergency or flood management as a matter relevant to the determination of the Project. Notwithstanding, the Applicant will consider extreme rainfall events and flooding, including along the Site Access Road and Silver City Highway, and consult with the local council and the NSW State Emergency Service (SES) when preparing the Emergency Response Management Plan for the Project.

4.3.2 Biodiversity

Representative Comment(s)

The proponent has not:

- Completed sufficient survey effort for all candidate flora and fauna species, so the impacts for most species are unknown.*
- Adequately completed the biodiversity assessment (BAM Stage 1) which is likely to affect the impact assessment (BAM Stage 2).*
- Adequately addressed the potential Serious and Irreversible Impacts (SAII) to *Austrostipa nullanulla*.*
- Appropriately assessed the presence and/or absence of Threatened Ecological Communities (TECs) or provided sufficient justification for assuming presence and/or absence of TECs.*

- *Provided detail on limitations to site access and how this may have affected survey outcomes.*
- *Appropriately or adequately applied the 'avoid and minimise' hierarchy of the Biodiversity Offsets Scheme (BOS).*
- *Addressed the prescribed and indirect impacts for threatened entities and has not identified residual impacts.*

There are incorrect statements about the impacts to threatened biodiversity in the Environmental Impact Statement (EIS).

- *The EIS incorrectly mentions that *Austrostipa nullanulla* was the only threatened species identified on site. However, the BDAR lists sixteen threatened fauna species recorded on site in surveys (Appendix G in BDAR and BDAR Executive Summary).*

Recommendation:

19.1. Correct statements in the EIS and associated summaries that refer to the absence of threatened species on site.

Response

The Applicant acknowledges the inadequacies of the BDAR submitted with the EIS. In response to the above feedback, the Applicant engaged Biodiversity Australia Pty Ltd to prepare a new BDAR for the amended Project. That BDAR is presented as Appendix 5 of the *Assessment Report* and is summarised in Section 6.3 of that document.

Representative Comment(s)

The proponent has not:

- *Referred the project to the Commonwealth Department of Climate Change, Energy, the Environment and Water which is necessary as there are 466 hectares of impact to 'Mallee Bird Community of the Murray Darling Depression Bioregion' endangered ecological community, and other Matters of National Environmental Significance (MNES), including those recorded on the site, and the proponent has not assessed these impacts.*

Response

The Applicant referred the Project as exhibited to the Commonwealth Department of Climate Change, Energy, the Environment and Water (Cth DCCEEW) on 22 July 2024. That referral was paused because of the proposed amendments to the Project. Biodiversity Australia Pty Ltd prepared a *Matters of National Environmental Significance (MNES) Assessment* for the amended Project. That assessment is presented as Appendix 6 of the *Assessment Report* and is summarised in Section 6.3.7 of that document. In summary, the assessment determined that the amended Project did not require referral under the *Environment Protection and Biodiversity Conservation Act 1999*. A copy of the *MNES Assessment* was provided to the Cth DCCEEW on 16 June 2025 to confirm that recommendation. The Cth DCCEEW recommended referral of the Project and the Applicant has agreed to do so.

4.4 Crown Lands

Representative Comment(s)

Authority to use, traverse, access or build infrastructure on Crown land is required under the Crown Land Management Act 2016. It is recommended that the proponent contact the Department as early as possible to discuss and initiate the processes required to authorise the use of and/or access to Crown land.

If lineal infrastructure (such as pipelines, electricity transmission lines and access tracks) are expected to traverse Crown land, an easement over said Crown land will be required for protection of the infrastructure.

It is important to note that the Mine Access Track (referred to as the "Mine Site Access Road" within the EIS) will need to be authorised by way of an easement.

As the easement process may be lengthy, it is also recommended that the proponent apply for a licence for each Crown land lot as soon as possible. A licence will temporarily authorise use and access for the infrastructure to traverse Crown land whilst the easement applications are being processed.

Response

The Applicant has liaised with Crown Lands in relation to constructing the Site Access Road and 66kV transmission line and has been advised an easement will be required. The easement will be accompanied by compensation agreements with the owners of affected land. The Applicant, through its subsidiary Wentworth Pastoral Company, has surveyed the easement. The Plan of Easement and compensation agreements are currently with the Landholders. Once those documents are executed by the land holders they will be lodged with Crown Lands

An application under s164 Mining Act 1992 for "right of way" from the Silver City Highway to the Mine Site would then be sought.

The Applicant anticipates that all required authorities would be issued prior to commencement of construction within areas of Crown land.

Representative Comment(s)

If infrastructure needs to be built on Crown land under Part 4 of the Environmental Planning and Assessment Act 1979, consent of the Minister for Lands and Property must be obtained via the Department.

Response

As described above, the Applicant contends that land within the Project Site is either a Western Lands Lease or has another form of tenure that negates the need to obtain the consent of the Minister for Lands and Property to provide landholder consent.

In addition, the Applicant has relied on Section 23(3)(b) of the *Environment Planning and Assessment Regulation 2021* which states that landholder consent is not required for a public notification development, provides that the applicant has been the subject of a public notice in a newspaper circulating in the area in which the development will be carried out and the notice has been published on the NSW Planning Portal. The Applicant has complied with these requirements.

Representative Comment(s)

If the proposal requires the use of Crown land for Council road realignment in order to implement the Copi Mineral Sands Project proposal, the land will need to be acquired under the Land Acquisition (Just Terms Compensation) Act 1991 (LAJTC Act) by Wentworth Shire Council.

Response

The Applicant notes the requirement to acquire Crown land to realign a section of Anabranh Mail Road and will ensure that the required land is acquired in accordance with the processes applicable at the time.

Representative Comment(s)

Please note that Lot 4069 DP 766544 has been subject to subdivision and the portion of this lot proposed to be impacted by the project is now Lot 1 DP 1255308.

Response

The Applicant acknowledges that Lot 4069 DP 766544 has been subdivided and the land is now designated as Lot 1 DP 1255308. **Table 3** presents an updated land titles the subject of the application for development consent, taking into account the amended Mine Site and Transportation Route – Monazite.

Table 3
Amended Project Site Land Titles

Lot	Deposited Plan	Lot	Deposited Plan	Lot	Deposited Plan
Amended Mine Site		Linear Corridor			
4068	766543	4068	766543	3423	765712
1 ¹	1255308	4117	766622	1908	763764
Rail Facility		3421	765710	1910	763766
1	1112089	3422	765711		
1	1062254				
7479	1200701				
Transportation Routes					
C	377667 ¹	Road reserves for Anabranh Mail Road, Silver City Highway, Wentworth Road, Patton, Comstock and Eyre Streets, Holten Drive, Kanandah Road, Ryan and Creedon Streets and the Barrier Highway.			
Note 1: A small section (approximately 5.6ha) of Lot 1, DP1255308 has been excluded from the Mine Site (Figure 3.2.1 of the <i>Amendment Report</i>)					
Note 2: The use of an approximately 1.5m ² of Lot C, DP377667 is dependent on the final design for the intersection of Patton and Comstock Streets.					

Representative Comment(s)

Lot 7479 DP 1200701 (Reserve 2421) is part of Willyama Common under the care, control and management of Willyama Common Trust (managed by the Broken Hill City Council). The proponent is encouraged to consult with Broken Hill City Council regarding the use of, or access to, this Crown land and to contact Department as early as possible if its involvement is required to assist.

Response

The Applicant has and continues to consult with Broken Hill City Council in relation to a range of matters, including use of a section of the Willyama Common for the Rail Facility. The Applicant anticipates that a suitable licence to use the small section of road within the Common will be granted by Council as Trustee of the Common.

Representative Comment(s)

For mining operations involving Crown land or Crown roads, the following requirements apply:

- 1. All Crown land and Crown roads within a Mining Lease (with surface rights), subject to mining or mining related activity, must be subject to a Compensation Agreement issued under Section 265 of the Mining Act 1992, to be agreed and executed prior to any mining activity taking place. The Compensation Agreement may include conditions requiring the Mining Lease Holder to purchase Crown land impacted on by mining activity.*
- 2. All Crown land and Crown roads within a Mining Lease (with sub-surface rights only) must be subject to a Section 81 Consent under the Mining Act 1992 where surface activities are proposed, to be agreed and executed prior to any surface activity taking place.*
- 3. All Crown land and Crown roads located within an Exploration Licence, subject to exploration activity, must be subject to an Access Arrangement issued under Section 141 of the Mining Act 1992, to be agreed and executed prior to any exploration activity taking place.*
- 4. All Crown roads within a Mining Lease or Exploration Licence must be subject to a works consent approval under Section 138 and/or Section 71 of the Roads Act 1993 where exploration, mining or mining related activity impact on these roads.*

Response

As previously indicated, the Applicant understands that no Crown land or Crown roads to which the above requirements would apply occur within the Mining Lease Application area. Notwithstanding, the Applicant acknowledges its obligations under the *Mining Act 1992* in relation to written access and compensation agreements with landholders, including the holders of Western Lands Leases.

4.5 Department of Climate Change, Energy, the Environment and Water – Heritage NSW

Representative Comment(s)

Heritage NSW agrees with the proposed management measures and recommendations (Sections 15 and 16 of the ACHAR). Heritage NSW has provided recommendations in relation to Draft Conditions of Consent.

Department of Climate Change, Energy, the Environment and Water – Heritage NSW
Submission No. A03

Response

The Applicant acknowledges the advice of Heritage NSW and would consent to conditions of consent generally in accordance with the draft conditions provided.

4.6 Department of Climate Change, Energy, the Environment and Water – Water Group

Representative Comment(s)

1.1 Recommendation – pre-determination

The proponent should demonstrate an ability to obtain sufficient entitlement for maximum potential take in each water source for the project prior to take occurring. This should include a market depth analysis on how to obtain the required groundwater shares from the Western Murray Porous Rock Groundwater Source.

Response

The updated *Groundwater Assessment* is presented as Appendix 4 of the *Amendment Report* and summarised in Section 6.3 of that document. That assessment identifies that maximum groundwater take associated with the Project would be 7,810ML/year during Year 1, with between 2,187ML/year and 2,874ML/year extracted during Years 2 to 18, decreasing to that required for rehabilitation operations during Year 20 and after.

At the time of finalisation of this document Applicant was in commercial negotiations with a third party in relation to a range of matters, including acquisition of sufficient groundwater allocation for the Project. In the event that those negotiations are unsuccessful, the Applicant would apply for a suitable allocation under the next Controlled Allocation Order under the *Water Management Act 2000*.

Representative Comment(s)

2.1 Recommendation – post approval

The proponent should provide an estimate of groundwater requirement in the post-mining rehabilitation stage when implementing the rehabilitation management plan.

Response

This matter is addressed above.

Once the final void has been backfilled, indicatively within 2 years of the completion of mining operations, groundwater take is expected to be limited to that required for rehabilitation. Once rehabilitation operations are complete, groundwater take is expected to be reduced to nil.

The Applicant would ensure that adequate groundwater allocation is maintained until the final void has been completely backfilled, rehabilitation operations are complete, and groundwater take has been demonstrated to be negligible.

Representative Comment(s)

2.2 Recommendation – post approval

The proponent should prepare a water management plan (WMP) that includes monitoring components, data management and reporting, groundwater model and a trigger action response plan (TARP) prior to the commencement of mining and in consultation with DCCEE Water.

Response

The Applicant anticipates that any conditions of consent issued for the Project would require preparation of a *Water Management Plan* in consultation with DCCEE Water consistent with the above recommendation.

Representative Comment(s)

2.3 Recommendation – post approval

The proponent should liaise with WaterNSW to replace the government monitoring bore GW036722 which will be destroyed by mining. The replacement bores (all 3 pipes) must be constructed and in operation at least 12 months before the removal of the original bore. The location of replacement bore, and construction design must be approved by DCCEE Water. The proponent must arrange access for monitoring of GW036722 with WaterNSW until it is removed.

Response

The Applicant has committed to replace GW036722 in consultation with WaterNSW and consents to the above requirements.

Representative Comment(s)

2.4 Recommendation – post approval

The groundwater model must be revised and updated to Model Class 2 at the end of Year 3 of mining in accordance with the current best practice guidelines.

Response

The Applicant anticipates that any conditions of consent issued for the Project would require preparation of a *Water Management Plan* in consultation with DCCEE Water. That Plan will include a monitoring bore network that would provide sufficient data to permit a Class 2 model to be developed within the nominated time frame. As a result, the Applicant would consent to a condition consistent with the above recommendation.

4.7 Department of Primary Industries – Agriculture

Representative Comment(s)

DPI Ag has reviewed relevant material in the documentation and considers that its SEARs requirements have been satisfactorily addressed and that the potential impacts on, and mitigation measures for, grazing properties by the mining and rehabilitation operations have been adequately described. Provided the applicant completes all individual property agreements before mining commences, DPI Ag has no further comment.

Department of Primary Industries – Agriculture Submission No. A02

Response

The Applicant acknowledges the advice of DPI-Agriculture and would complete individual property agreements with directly impacted landholders prior to construction commencing, as well as good neighbour agreements with all fence line neighbours.

Representative Comment(s)

BFS was asked for comment on "further specific advice about likely impacts of the proposed project on biosecurity, and heavy metal residue in meat product given the livestock farming surrounding the proposed project."

...

The proponent has a general biosecurity duty to ensure [under the NSW Biosecurity Act 2015] that all risks associated with chemical contamination are prevented, eliminated or mitigated, including any biosecurity risks to neighbouring producers with livestock, or to feral animals (including goats) that may be harvested or hunted as a food source on the proponent's land or other properties (noting that some landowners harvest rangeland goats for food).

...

The contaminants of concern for food producing animals from a public health and trade perspective include Arsenic, Cadmium, Lead, Mercury and Tin. Per - and Polyfluoroalkyl substances (also known as PFAS) are also contaminants of potential concern, if they are used in mining processes.

Department of Primary Industries and Regional Development – Biosecurity and Food Safety
Submission No. A15

Response

Section 6.9.6.6 of the *Amendment Report* and Sections 6.15 and 6.25 of Northstar (2025) presented as Appendix 12 of that report present an assessment of each of the identified metals, with the exception of Tin. In each case, the rate of deposition for each metal was very substantially less than the most stringent of the adopted criteria. Tin is not enriched within the materials that would be mined by the Project

Section 6.12 of the *Amendment Report* and DBH (2025a and 2025b) presented as Appendix 14 of that report present an assessment of radiation-related risks for human and non-human biota within and surrounding the Mine Site. In summary, those assessments determined based on highly conservative assumptions, that radiation levels would be very substantially less than the relevant criteria.

Finally, the Project would not use PFAS chemicals. As a result, contamination of the Mine Site and surrounding lands with PFAS would not occur.

Representative Comment(s)

The proponent should develop a comprehensive biosecurity risk management plan (covering the stages of construction, mining and rehabilitation), that considers their [general biosecurity duty], the relevant biosecurity risks and identifies appropriate strategies to prevent, eliminate or minimise those risks. Including (but not limited to):

- *Plant pests or diseases,*
- *Weeds (terrestrial and aquatic)*
- *Pest animals, and*
- *Adverse effects on the economy and community from livestock (including harvested rangeland goats) being exposed to chemical contamination from the mining operation or environmental factors.*

Please refer the applicant to the Biosecurity Risk Management in Land Use Planning and Development Guide for consideration.

Department of Primary Industries and Regional Development – Biosecurity and Food Safety
Submission No. A15

Response

The Applicant would manage biosecurity risks throughout the life of the Project as both operators of the proposed mine and as a substantial landholder and neighbour. If required, the Proponent would prepare a *Biosecurity Risk Management Plan* in a manner that would be consistent with the *Biosecurity Risk Management in Land Use Planning and Development Guide*.

Representative Comment(s)

The proponent should also consider any possible animal welfare issues arising from livestock or native animals, including birds, having unrestricted access to the salt water being drawn from aquifers for use in the mining operation. The repeated consumption of salt water could result in salt toxicity.

Department of Primary Industries and Regional Development – Biosecurity and Food Safety
Submission No. A15

Response

The Applicant notes that the active sections of the Mine Site, including the dredge ponds, would be fenced and would be subject to 24-hour operations. In addition, the water within the dredge pond and Water Storage Dam will be hypersaline. As a result, the Applicant anticipates that fauna, both livestock and native animals, would be unlikely to drink water from the dredge pond or Water Storage Dam and salt toxicity is unlikely to occur.

4.8 Environment Protection Authority

Representative Comment(s)

Air Quality Impact Assessment

The EPA have reviewed the Air Quality Impact Assessment and have identified the following issues:

1. *Emissions inventory is not sufficiently transparent;*

Recommendation: The AQIA be revised to include additional detailed information in the emissions inventory to enable emission estimates to be assessed and replicated.

2. *Emissions inventory lacks detail regarding wind erosion of exposed areas;*

Recommendation: The AQIA be revised to enable emission estimates to be assessed and replicated for exposed areas susceptible to wind erosion. Further specific detail should be provided regarding the calculation of all exposed areas (including rehabilitated/revegetated areas and the offpath storage facility) to ensure the emissions inventory is accurate, transparent, and able to be replicated. The updated AQIA should include consideration regarding the anticipated level of rehabilitation achieved for each scenario.

3. *Control factors outlined within the AQIA may be difficult to achieve in practice; and*

Recommendation: The AQIA be revised to include additional detail of how control efficiencies will be met throughout the lifetime of the project. This includes (but is not limited to) the availability of water/chemical suppressants and the proposed application rates of water/chemical suppressants.

The revised AQIA should include the viability of the adopted level of controls to reduce expected emissions. The updated AQIA should confirm whether there are any additional practicable mitigation controls or measures that could be implemented to minimise air emissions or reduce future impacts once the site is operational.

4. *Proposed silt content of haul roads does not reflect figures outlined in the AQIA.*

Recommendation: The AQIA be revised to include specific details of how haul roads will be constructed of low-silt materials and how such material will be sourced.

Response

Northstar (2025), presented as Appendix 12 of the *Amendment Report* has been revised to account for the amended Project, taking into account the above. Table 2 of that report identifies how and where each of the above matters have been addressed.

Representative Comment(s)

Waste Tyre Disposal

The EPA recommends that further information is provided about the Applicants proposal for the disposal of end of life mining heavy plant tyres.

Further information is required around any proposal to dispose of end of life mining heavy plant tyres, either offsite or on the premises.

Waste Tyre Storage and Disposal

The EPA recommends that the following conditions are added to the project approval should the project be approved.

- i) Heavy plant waste tyres may be stockpiled on site subject to conditions; and*
- ii) The Applicant must undertake a review of available recycling options for end of life heavy plant tyres at least once every two (2) years and provide a report to the EPA*

Response

Used road vehicle tyres would be removed from site for recycling or disposal in accordance with EPA regulations.

Used heavy mining plant tyres would, where practicable, be reused for retaining walls, traffic control, etc or recycled. Where that is not practicable, such tyres would be placed into sections of the backfilled Extraction Area in a location where they would not adversely impact on settling and compaction of the placed material.

Where tyres are required to be stockpiled on site, they would be stockpiled in accordance with EPA guidelines or would be used, recycled or placed into the backfilled Extraction Area as soon as practicable.

In the event that used heavy plant tyres are unable to be reused or recycled and are required to be placed into the backfilled Extraction Area, the Applicant would consent to a condition requiring an assessment of recycling options every 2 years.

Representative Comment(s)

Noise

The EPA has attached recommended conditions for noise and recommended they be added to the project approval should the project be approved

Environment Protection Authority Submission No. A01

Response

The Applicant has reviewed the draft conditions and consents to the proposed conditions, with the exception of the requirement under draft condition M8.1 to monitor noise bi-annually at each of the residences identified in draft condition L6.1. **Table 4** presents recommended alternate monitoring requirements for consideration. In summary, the Applicant:

- agrees that bi-annual monitoring at R1 – Huntingfield is appropriate;

- has previously agreed with the owner of R7 – Bunnerungie to undertake noise monitoring;
- contends that noise monitoring is not required at two residences (R4 – Warwick and R5 – Sunshine); and
- would undertake noise monitoring on request at all other residences.

Table 4
Proposed Alternative Noise Monitoring Requirements

Residence	Monitoring Frequency	Justification
R1 – Huntingfield	Bi-annual, subject to landholder consent	Negotiations with the owners of this residence are ongoing and in the absence of a negotiated agreement, bi-annual noise monitoring is appropriate.
R2 - Belmore	On request	The residence is approximately 9.8km from the Limit of Disturbance and is unlikely to be adversely impacted by Project-related noise.
R3 – Wenba	On request	The residence is approximately 8.3km from the Limit of Disturbance
R4 – Warwick	Nil	Residence is Project-related
R5 – Sunshine	Nil	Residence is uninhabitable. Should the residence be made habitable and be reoccupied, the Applicant would undertake bi-annual noise monitoring
R6 – Amoskeg	On request	The residence is approximately 14.6km from the Limit of Disturbance and is unlikely to be adversely impacted by Project-related noise.
R7 – Bunnerungie	Bi-annual, subject to landholder consent	The residence is approximately 30.4km from the Limit of Disturbance and 2.2km from the upgraded Anabranche Mail Road and is unlikely to be adversely impacted by Project-related noise. Notwithstanding, the Applicant committed during consultation for the EIS to undertake noise monitoring at the residence
R8 - Coleraine	On request	The residence is approximately 29.9km from the Limit of Disturbance and is unlikely to be adversely impacted by Project-related noise
R9 – Warranaga		The residence is approximately 12.9km from the Limit of Disturbance and is unlikely to be adversely impacted by Project-related noise
R10 - Toora		The residence is approximately 30.1km from the Limit of Disturbance and is unlikely to be adversely impacted by Project-related noise

Representative Comment(s)

Noise Management Plan

The EPA recommends that the Applicant prepare and implement a Noise Management Plan for the development to the satisfaction of the Secretary, and prior to any construction works.

Surface and Groundwater Water

The EPA recommends that the Applicant prepare and implement Surface Water and Groundwater Management Plans for the development to the satisfaction of the Secretary, and prior to any construction works.

Waste Management Plan

The EPA recommends that the Applicant prepare and implement a Waste Management Plan for the development to the satisfaction of the Secretary, and prior to any construction works.

Radiation Management Plan

The EPA recommends that the Applicant prepare and implement a 'Radiation Waste Management Plan' for the development to the satisfaction of the Secretary, and prior to any construction works.

Environmental Management

The EPA recommends that the Applicant prepare and implement and 'Environmental Management Strategy' for the development to the satisfaction of the Secretary, and prior to any construction works.

Response

The Applicant would consent to a condition requiring preparation of the above documents.

Representative Comment(s)

The EPA intend to use the information provided in the groundwater quality monitoring program and surface water quality monitoring program to determine and condition the monitoring requirements within an Environment Protection Licence for the proposal.

Response

Noted

Representative Comment(s)

The Applicant must not cause, permit or allow any waste generated outside the premises to be received at the premises for storage, treatment, processing, reprocessing or disposal or any waste generated at the premises to be disposed of at the premises, except as expressly permitted by an Environment Protection Licence.

Response

Noted.

Representative Comment(s)

Groundwater

The EPA note that the project proposes removing a Water NSW owned, government groundwater monitoring bore (GW036722) as it is located within the mining lease. The bore is a clustered bore consisting of 3 individual wells monitoring different depths in the underlying strata. The bore is 411m at its deepest. The EPA recommends that :

- 1. DCCEE-W, water group should be consulted for an agreement on the replacement of the subject monitoring bore should it be removed.*
- 2. Decommissioning activities should be conducted in accordance with Chapter 18 of the Minimum Construction Requirements for Water Bores in Australia.*

Response

Section 6.2.3 of the EIS states that the Applicant would:

- Ensure prior to the removal of bore GW036722 that the bore casings accessing the middle and lower aquifers in are grouted and sealed in accordance with Section 18 of the document *Minimum Construction Requirements for Water Bores in Australia* (2020) or its latest version.
- Reestablish, if required by NSW DCCEE, monitoring bore GW036722 as close as practicable to the current location or in an alternative location as instructed by NSW DCCEE. The replacement bore would include separate screened intervals within each of the Upper, Middle and Lower aquifers.

4.9 Heritage Council

Representative Comment(s)

The subject site is not listed on the State Heritage Register (SHR), nor is it in the immediate vicinity of any SHR items. Further the site does not contain any known historical archaeological relics. Therefore, no heritage comments are required.

The Department does not need to refer subsequent stages of the proposal to the Heritage Council on NSW.

Response

The Applicant notes the Heritage Council's submission.

4.10 Mining Exploration and Geoscience

Representative Comment(s)

As Ilmenite, Leucoxene, Monazite (and associated Rare Earth Minerals), Rutile and Zircon are prescribed minerals under the Mining Regulation 2016, the Proponent must obtain relevant mining leases to allow mineral extraction for the project area.

...

Monazite is a scheduled mineral in Schedule 1 of the Mining Regulation 2016. MEG notes the project description lists Monazite being recovered as a product, as part of the project. MEG notes that Monazite is not listed as a mineral on the Mining Lease Applications submitted by RZ Resources Ltd.

Response

The Applicant has amended the Mining Lease Applications to include Monazite.

Representative Comment(s)

Biodiversity offset assessment

MEG requests that the Proponent consider potential resource sterilisation should any future biodiversity offset areas be considered. The Proponent must consult with MEG and any holders of existing mining or exploration authorities that could be potentially affected by the proposed creation of any such biodiversity offsets, prior to creation occurring. This will ensure there is no consequent reduction in access to prospective land for mineral exploration or potential for the sterilisation of mineral and extractive resources.

Response

The Applicant notes the request that key stakeholders be consulted in relation to the establishment of any Biodiversity Stewardship Site. As a result, the Applicant would ensure that MEG and holders of mineral authorities who may be adversely impacted by the establishment of a Stewardship Site are appropriately consulted.

4.11 National Parkes and Wildlife Service

Representative Comment(s)

1. Closure of Nulla Road

The proposal will involve closure of part of Nulla Road in the 11th year of operations for a period of approximately 3 years. This will remove the main route used by NPWS to access Tarawi Nature Reserve. This is not optimal in terms of NPWS providing a timely response to wildfires or other emergencies in the nature reserve, and it is disappointing that NPWS was not identified as a user of the affected section of Nulla Road in the EIS (ref: Section 3.6.25 Closure and Re-establishment of Nulla Road). NPWS acknowledges that an alternative route will remain available from the north to Tarawi Nature Reserve and that the closure of Nulla Road will not be permanent. Hence, NPWS does not regard the temporary closure of the road as a significant concern but needs to be informed when that closure occurs.

NPWS recommends

- Conditions of consent should specifically include NPWS as a party to be notified of closures of Nulla Road, with notifications to occur at least 2 weeks before scheduled closures and notifications of any unplanned closures of Nulla Road to occur within 12 hours.

Response

Nulla Road is no longer proposed to be closed.

Representative Comment(s)

2. Light spill

The EIS outlines that mining, processing and maintenance operations as well as certain construction activities will occur 24 hours per day. It is assumed therefore that artificial lighting will be required to enable these operations at night. However, the project description in Section 3 of the EIS only mentions lighting in relation to the rail facility layout in Broken Hill.

Section 6 of the EIS identifies there will be lighting from both mobile and fixed plant as well as mobile lighting towers in work areas, and that these may be visible on sections of Nulla Road and at Residence R1. As the mine site is located in a naturally dark area with no current light pollution issues, the glow of artificial lighting could potentially be visible for several kilometres surrounding the mine, including in parts of Tarawi Nature Reserve.

The EIS fails to identify that lighting may exacerbate or cause additional indirect impacts on wildlife through changes to nocturnal behaviour (including foraging), increased competition with diurnal species, or disruption of reproduction or migration patterns.

The EIS's proposed management and mitigation measures (in Section 6.13.4) fail to mention compliance with the Australian Standard 4282 --- Control of the obtrusive effects of outdoor lighting or the National light pollution guidelines for wildlife (Cth DCCEEW 2023). It is noted AS/NZS 4282 was updated in November 2023 and now defers to the National Light Pollution Guidelines for Wildlife where there are specific threatened species at risk of disturbance from artificial lighting. Good lighting design principles are also provided in Dark sky planning guideline: Protecting the observing conditions at Siding Spring (DPE 2023) which may be appropriate to minimise unnecessary light pollution in this location.

NPWS recommends

- *Conditions of consent should identify that lighting at the mine site should comply with Australian Standard 4282:2023 --- Control of the obtrusive effects of outdoor lighting and National Light Pollution Guidelines for Wildlife, and have regard to the good lighting design principles outlined in the Dark Sky Planning Guideline.*

Response

The Applicant would consent to a condition of consent requiring consideration of *Australian Standard 4282:2023* and *National Light Pollution Guidelines for Wildlife*.

The design principles outlined in the *Dark Sky Planning Guideline* will be taken into regard when designing the lighting for the mining operation.

Representative Comment(s)

3. Groundwater drawdown

The proposed method of mineral extraction relies on groundwater inflows to the Extraction Area to form the pond upon which the dredges and Wet Concentration Plant would be floated. The EIS acknowledges that management of ground and surface waters within the mine site would be a critical component of the proposal. As well as maintaining water levels in the dredge pond, the project will involve extraction of up to 9.6 GL of groundwater during the first year of mining operations, with groundwater take between Years 3 and 16 expected to be between 3.3 and 5.4 GL per annum.

There are two active bores in Tarawi Nature Reserve – Canegrass Bore (GW060786) and Tarawi Bore (GW005613). The location of Canegrass Bore is mapped within the 15 km buffer of the mine site in Figure 6.2.2 but it is not listed in Table 6.2.2. This Bore is operated by Wentworth Shire Council and provides water to Wenba station during drought conditions.

The EIS claims there is sufficient groundwater available in the isolated and shallow hyper-saline upper aquifer in the mine site, and that no off-site impacts are expected to groundwater systems.

NPWS acknowledges there is an extensive network of groundwater monitoring bores in the region (as depicted in Figure 6.2.1) but most are located to the east and south of the mine site. There are very few monitoring bores to the area north-west of the mine site. The network of monitoring bores maintained by the Applicant (as shown in Figure 6.2.4) are situated to the north-east of the eastern and midway parts of the proposed dredge path. No monitoring bores are proposed west of Nulla Road.

NPWS recommends

- *Conditions of consent should identify the need for additional groundwater monitoring bores west of Nulla Road.*

Response

The Applicant anticipates that any conditions of consent issued for the Project would require preparation of a *Water Management Plan* in consultation with NSW DCCEE, including nomination of a suitable monitoring bore network. That network would include bores surrounding the proposed mining operations, including between the Extraction Area and the Tarawi Nature Reserve, subject to landholder consent.

4.12 Resources Regulator

Representative Comment(s)

It is noted that Table 3.1.1 on page 3-5 of the EIS states there is no final void associated with the rehabilitated final landform. This is in contrast to page 3-94 where proposed rehabilitation objectives and completion criteria have been provided for a final void. As such, further clarification is required as to whether there is a void in the final landform and rehabilitation plan.

Response

Appendix 1 of the *Amendment Report* has been adjusted to remove potential ambiguity. In summary, no final void is proposed.

Representative Comment(s)

Furthermore, it is noted that the final landform will be undulating with areas subject to swell as well as depressions. As such, further detail will be required in the rehabilitation outcome documents to be approved by the Resources Regulator under Schedule 8A of the Mining Regulation 2016 in regards to the target species that will be suitable for establishment within the variable landform units. Noting that the species will need to be representative of locally occurring vegetation communities.

Response

The Applicant anticipates that the *Rehabilitation Management Plan* required to be prepared prior to the commencement of mining operations, will be required to include the above information to be approved by the Resources Regulator.

Representative Comment(s)

Regulatory Requirements If Approved

The proponent will be required to comply with rehabilitation requirements under the mining authorisations prior to the commencement of the works associated with the proposal.

The Resources Regulator may undertake assessments of the mine operators' proposed mining activities under the Work Health and Safety (Mines and Petroleum Sites) Act 2013 and Regulation as well as other WHS regulatory obligations.

Response

The Applicant acknowledges the above statements.

4.13 Rural Fire Service

Representative Comment(s)

In recognition that the proposed development may increase the level of bush fire risk within the landscape and be impacted upon during a bush fire event, the following matters should be addressed in the Environmental Impact Statement:

- *the aim and objectives of Planning for Bush Fire Protection 2019;*
- *identification of potential ignition sources during construction and operation of the development;*
- *storage of fuels and other hazardous materials;*
- *proposed bush fire protection measures for the development, including vegetation management and fire suppression capabilities;*
- *operational access for fire fighting appliance to the site/s; and*
- *bush fire emergency and evacuation planning.*

Response

The Applicant notes that Section 6.11.5 of the EIS addresses bushfire management, and determined that as all proposed activities, with the exception of initial land clearing operations, would be undertaken within cleared areas with a minimum 50m buffer to vegetation. As a result, no further assessment of bushfire risks are required. Notwithstanding, the Applicant committed to a wide range of measures to assist with the management of bushfire-related risks and responses and would consult with the Rural Fire Services during preparation of the relevant Management Plans.

4.14 SA Water

Representative Comment(s)

Groundwater

The proposed mining technique and water extraction provided in the EIS, indicates the potential for mixing of the shallow and deep aquifer in this location. The studies provided in the EIS documentation indicate that any mixing of the aquifers would be low likelihood and of limited risk to the local and regional aquifers and environment.

The proposed short- and long-term monitoring of groundwater bores and network, does not seem sufficient to provide advance notice of any issues that may be caused by the proposal. It is requested that additional monitoring on the local and regional networks be undertaken and publicly reported and provided to local neighbours for information and consideration. This monitoring should be enduring as any impacts will potentially last into the decades to remediate.

Response

The Applicant anticipates that the *Water Management Plan* to be prepared for the Project, including groundwater monitoring requirements, will be prepared in consultation with NSW DCCEE Water and that all monitoring results will be required to be made publicly available, including to the surrounding landholders. The Applicant also anticipates that monitoring will be required to be undertaken until relevant NSW Government agencies are satisfied that monitoring is no longer necessary.

Representative Comment(s)

Cultural Heritage

It is noted that it is likely that a number of existing cultural sites will be damaged during the mine occupation, including cultural sites. A number of the damaged sites should be subject to additional testing and validation of dates to provide additional knowledge of habitation dates, which will increase the localised body of knowledge in this area. It is specifically requested that where possible that testing (dating) of the proposed damaged hearths be undertaken should it be deemed acceptable to the local indigenous community.

Response

Section 6.5.6 of the EIS states that 55 sites of Aboriginal heritage significance would be totally disturbed and 88 sites would be avoided. Furthermore, that section identifies that there three hearth sites that would be disturbed would be subject to archaeological excavation of hearths for dating purposes.

4.15 Transgrid

Representative Comment(s)

Please be advised that RZ Resources Limited (Connection Applicant) has submitted a formal connection enquiry for their proposed Copi Sand Mineral Mine project, with a load capacity of 50 MVA and a point of connection to Transgrid's 220 kV transmission line X2 between Buronga

and Broken Hill substations. Transgrid has completed its assessment and provided the Connection Applicant with a connection enquiry response, in accordance with Transgrid's obligations under the National Electricity Rules (NER).

The Connection Applicant will need to further engage Transgrid via a Connection Processes Agreement to facilitate an application to connect to Transgrid's network, in accordance with the NER. During the application stage, the assessment and approval of the proposed connection will include, but not limited to, performance standards and connection assets.

Response

The Applicant confirms that it has progressed its discussions with Transgrid regarding connection of the Project to Transgrid's X2 line (the 220 kV Buronga to Broken Hill transmission line) and is currently finalising the Connection Process Agreement (CPA). The CPA will facilitate the necessary studies, approvals and commercial arrangements to allow the construction of the infrastructure required to power the Project

4.16 Transport for NSW

Representative Comment(s)

TfNSW requests that the following information be provided for further consideration of the subject application:

1. *A strategic road design plan for a Channelised Right-turn (CHR) / Auxiliary Left-turn (AUL) treatment at the intersection of Silver City Highway / Anabranche Mail Road, designed in accordance with Austroads Guides, Australian Standards and relevant TfNSW supplements and standards. The design must consider (inter alia):*
 - a. *Design speed,*
 - b. *Deceleration of the design vehicle,*
 - c. *Capacity for storage of at least one design vehicle,*
 - d. *Necessity for lighting at the remote location in accordance with AS1158.3:2020,*
 - e. *Assessment of the access achieves SISD, Minimum Gap Sight Distance, Approach Sight Distance and Safe Stopping Distance in accordance with Part 4A of Austroads Guide to Road Design and TfNSW's supplement (TS 02642:1.0),*
2. *Longitudinal drawings to illustrate the required Safe Intersection Sight Distance (SISD) at the access location. The application should be supplemented with scaled drawings illustrating the SISD in a plan format for the design speed as well as a 2.5sec Rt to account for traffic activity outside daylight hours or in adverse weather conditions.*

Response

The Applicant met with Transport for NSW on 19 August 2024 and agreed to install a CHR/AUL intersections as requested by Transport for NSW. A strategic design for the intersection has been prepared by Tonkin Consulting Pty Ltd (Tonkin) and is presented in Tonkin (2025), presented as Appendix 9 of the *Amendment Report*. Transport for NSW on 4 April 2025 indicated satisfaction with the amended intersection design.

4.17 Wentworth Shire Council

Representative Comment(s)

Council have no comments to make in relation to the EIS of the proposed Copi Mineral Sands Project.

Response

The Applicant notes Council's response and also notes the extensive and wide-ranging discussions and consultation with Council since at least 2018.

A draft Planning Agreement has been agreed in-principal between the parties. That agreement addresses the following matters.

- Contributions to the maintenance of Renmark, Pine Camp, Anabranh Mail (excluding the section between the Site Access Road and Silver City Highway) and Nulla Roads.
- Arrangements for the upgrade, maintenance and reinstatement of Anabranh Mail Road between the Site Access Road and Silver City Highway.

5. Public and Organisation Submissions

5.1 Introduction

This section presents a response to the matters raised in submissions received from the public and organisations in the form of support, objection, or commentary.

As identified in Section 2.3, 52 public and non-government organisation submissions were received. In summary:

- 9 submitters support the Project;
- 5 submitters made a comment only; and
- 37 submitters object to the Project.

The Applicant has reviewed all submissions received and has attempted to categorise the matters raised as follows. These matters are presented generally in the order that they are presented in the EIS.

- Approvals
 - SSD Process
 - Other Approvals Required
- RZ Resources
- Community Engagement
- Proposed Operations
 - Mining
 - Rehabilitation and Final Land Use
- Groundwater
 - Users
 - Contamination
 - Interference
- Biodiversity
 - General
 - Threatened Species and Ecological Communities
- Soils and Agriculture
- Aboriginal Heritage
- Traffic and Transportation
- Surface Water
 - Users
 - Contamination
- Noise
- Air Quality
 - Dust
 - Health and Environment
 - Greenhouse Gas
- Hazards - Radiation
- Visual Amenity
- Social
- Economic
 - General
 - Employment
 - Feasibility

Appendix 1 provides a register of all submissions received and the matters raised based on the above categorisation. A significant effort has been made ensure that each matter raised has been adequately categorised and is accurately reflected in this report. However, it is appreciated that not all submitters will agree with the above categorisation and that some may feel their concerns have not been adequately addressed.

In addition, since the submissions were prepared, the Applicant has amended the Project and has undertaken a range of additional assessments as described in the *Amendment Report*. As a result, a range of the matters raised are no longer be relevant or may be reduced in significance.

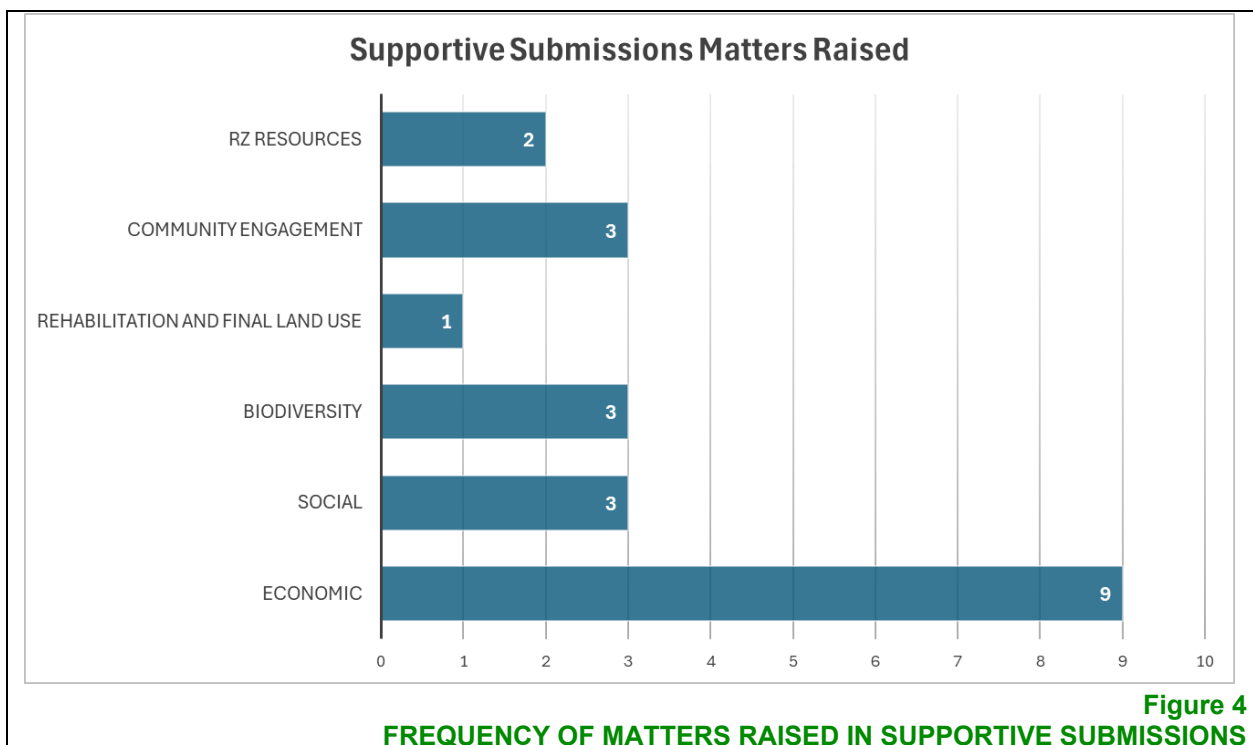
Finally, the Applicant has since met with a number of near neighbours and others who provided a submission to discuss their concerns and explain aspects of the Project and assessments undertaken. As a result, some submissions may no longer reflect the opinion or concerns of the submitters.

Notwithstanding, the following subsections present representative extracts from the submissions received in *italics* . An overview of the context of each matter is then presented and a response to the matter as a whole is provided. Responses to individual submissions are provided where relevant. In preparing responses to the submissions received, the proposed amendments to the Project have been considered.

5.2 Submissions – Support

5.2.1 Introduction

A total of 9 submissions in support for the Project were received. These submissions generally acknowledged the benefits of the Project for the local, regional and national community such as employment, economic investment and improved social services. **Figure 4** displays the frequency with which the listed matters were raised. The following subsections provide a commentary regarding the matters raised.



5.2.2 RZ Resources

Representative Comment(s)

Personally, working with RZ Resources has been a rewarding experience. Their professionalism, integrity, and collaborative spirit have set a benchmark for corporate partnerships in our region. Their inclusive approach ensures that local businesses are not just suppliers but integral partners in their vision for sustainable growth.

Ezio De Angelis, Mildura, Victoria - Submission No. PS02

I have known about this project since the early days of this project commencing. Although still in its early stages, I have seen a lot of business flow through to us and other businesses in the region. Businesses in hospitality, trade services and equipment supply have benefitted from their current activities. I have had only positive interaction between the management and staff of RZ Resources who have always been open and informative

Wentworth Grande Resort, Wentworth, NSW – Submission OS03

Response

The Applicant acknowledges the submitter's comments and notes that it has consistently sought to operate in a professional manner that supports local businesses and residents. It is pleasing to note that the submitters recognise those efforts. The Project would allow the Applicant to continue to support local businesses and residents for at least the life of the Project.

5.2.3 Community Engagement

Representative Comment(s)

By all reports the company, RZ Resources has also sought to engage with the community through sponsorship of community events and funding numerous local projects.

Stef Golobic, Nichols Point, Victoria - Submission No. PS01

Moreover, RZ Resources prioritises community engagement and social responsibility. Their initiatives, whether supporting local events or contributing to charitable causes, have made a tangible difference in Wentworth.

Ezio De Angelis, Mildura, Victoria - Submission No. PS02

The project's commitment to regular consultation and collaboration with our community ensures that our voices are heard and our needs are met. This inclusive approach will foster a strong sense of ownership and pride among residents.

Kerry Ross, Wentworth, New South Wales - Submission No. PA04

Response

The Applicant acknowledges the submitter's comments and is pleased that its efforts to engage with the community have been positively regarded. As stated in Section 5.1 of the EIS and Section 5.2 of the *Amendment Report*, the Applicant has engaged extensively with the local and broader Wentworth community since 2017. The key principles of the Applicant's Community Engagement Strategy focusses on openness and honesty, approachability and meaningful,

relevant, and respectful consultation, which is reflected in the submitter's supporting comments. The Applicant would continue to engage and support the community throughout the life of the Project.

5.2.4 Rehabilitation and Final Land Use

Representative Comment(s)

2. ***Land Rehabilitation***: Comprehensive plans for land rehabilitation will ensure that mined areas are restored and revitalized. These efforts will maintain local biodiversity and contribute to the health of our ecosystems.
3. ***Ongoing Monitoring***: Continuous environmental monitoring will guarantee that the project adheres to the highest standards. This proactive approach will prevent negative impacts and promote long-term environmental stewardship.

Kerry Ross, Wentworth, New South Wales - Submission No. PS04

Response

The Applicant acknowledges the submitter's comments recognising RZ's commitment to ensuring a safe and stable final landform with suitable land uses following mine closure. Section 3.9 and Section 3.12 of Appendix 1 of the *Amendment Report* detail an extensive rehabilitation and closure strategy for the Project. Additionally, rehabilitation activities within the Mine Site would be planned and undertaken in accordance with a *Rehabilitation Management Plan* to be prepared following receipt of development consent and grant of the Mining Lease for the Project, and prior to the commencement of any mining-related activities. The Plan would address in detail all rehabilitation-related requirements nominated in the development consent.

Ongoing monitoring for a number of environmental factors including air quality, radiation, noise, soil, biodiversity and groundwater will be implemented by the Applicant in accordance with the commitments outlined in the EIS and *Amendment Report*, and implemented through various environmental management plans to be prepared following approval of the Project.

5.2.5 Biodiversity

Representative Comment(s)

1. ***Sustainable Practices***: The mine's use of advanced, environmentally friendly techniques will minimize its ecological footprint, preserving the natural beauty of our region. This commitment to sustainability will help protect our local environment for future generations.

Kerry Ross, Wentworth, New South Wales - Submission No. PA04

The project's commitment to environmental sustainability ensures that our beautiful region remains pristine

Wentworth Mechanical, Wentworth, NSW – Submission OS01

Mineral Sands operations are comparatively much more environmentally sustainable in the extraction and concentration of their minerals compared to alternative sources. Unlike Mineral Sands Deposits, hard-rock sources require much more energy intensive mining and rock-breaking methods. Clay-based Rare Earth Mineral deposits also require high volumes of acid and other reagents for concentration, which the Copi Mineral Sands Project does not require. The Copi Project will primarily rely on gravity separation and electrostatic separation equipment, for which it will be sourcing Australian manufacturers.

IHC Mining, Elsewhere – Submission OS02

Response

The Applicant acknowledges the submitter's comment and recognition of RZ's commitment to avoid and minimise environmental impact to the extent practical. This is stated in Section 1.6 and 2.5 of the EIS. It is also important to note that the Project would be regulated by the NSW Government and subject to monitoring, reporting and independent auditing requirements. As such, the Applicant would implement the following key strategies throughout the life of the Project to avoid and minimise Project-related biodiversity impacts.

- Ensure that the Project is developed strictly in accordance with the commitments included within all application documents and all regulatory conditional requirements.
- Prepare clear and detailed Management Plans that incorporate all regulatory requirements.

5.2.6 Social

Representative Comment(s)

*1. ****Enhanced Community Services****: The Copi Project's support for local initiatives will lead to improved healthcare, education, and recreational facilities. These enhancements will directly benefit our residents, making Wentworth an even better place to live.*

Kerry Ross, Wentworth, New South Wales - Submission No. PA04

The Copi Project will produce feedstock for the production of titanium, zirconium and rare earth minerals - all of which feature on Australia's Critical Minerals List. These minerals are recognised for their role in Australia's advanced manufacturing industries and the global transition towards net-zero emissions.

IHC Mining, Elsewhere – Submission OS02

The future of Wentworth's growth and the sleepy NW region of NSW lies in this project going ahead. The mining operation proposed will lay the foundation of unprecedented growth in Wentworth Shire. This project will have a long lasting effect on growth and development in the region.

Wentworth Grande Resort, Wentworth, NSW – Submission OS03

Response

The Applicant acknowledges the submitter's comments and is committed to continue to support local initiatives that will enhance social services and directly benefit residents in the Wentworth community. It is particularly noted that the Project would be commencing around the same time as other major mining operations in the area, namely the Snapper and Ginko Mineral Sands Mines, will be winding down and approaching closure. The Project would enhance employment, improve infrastructure services and provide additional community investments, including assistance with local road development and installation and maintenance of a Rural Flying Doctor Service (RFDS)-registered airstrip for Project and community use.

5.2.7 Economic

Representative Comment(s)

Assuming the same rigid environmental and cultural standards are met, this site will provide an incredible support for not only Wentworth but also the wider region. As a business owner I obviously understand the economic benefits which will flow directly into the community, but also in creating employment opportunities for all in our municipality including our indigenous members.

Stef Golobic, Nichols Point, Victoria - Submission No. PS01

As a proud member of the local business community in Wentworth, I am delighted to share the positive impact of our partnership with RZ Resources through the COPi project. Located just an hour away from our town, RZ Resources has not only been a key economic driver but also a steadfast partner in fostering growth and sustainability.

Our collaboration with RZ Resources has been nothing short of exemplary. Their commitment to supporting local businesses like ours has been evident from day one. Through procurement opportunities and strategic partnerships, they have enabled us to expand our services and reach new markets, which has significantly strengthened our business's resilience and competitiveness.

Ezio De Angelis, Mildura, Victoria - Submission No. PS02

This project brings hope for our future by creating job opportunities and encouraging skill development among young people like me. It promises to inject vitality into our local economy, supporting businesses and services that we rely on. The Copi Project represents a positive step towards a prosperous and sustainable future for our community.

Miah Spary, Wentworth, New South Wales - Submission No. PS03

1. ****Local Job Creation****: *The Copi Project will create numerous job opportunities for our community, both during the construction phase and throughout the mine's operation. These jobs will provide stable incomes and reduce unemployment, allowing more families to thrive.*

2. ****Economic Boost****: *The increased economic activity will benefit local businesses, from retailers to service providers. The influx of workers and their families will lead to higher demand for goods and services, stimulating local commerce and revitalizing our economy.*

3. ****Investment and Growth****: *The project will attract new investments to Wentworth, encouraging the development of complementary businesses and infrastructure. This growth will create a more dynamic and resilient local economy.*

Kerry Ross, Wentworth, New South Wales - Submission No. PA04

This is a fantastic opportunity to develop a critical project in NSW creating jobs for the future and adding value to our great country's vast resources.

Name Withheld, South Bank, Queensland - Submission No. PS05

This project will create numerous jobs, greatly benefiting the local region and area. The initiative promises to stimulate economic growth while ensuring responsible resource management.

Name Withheld, Narrabundah, Australian Capital Territory - Submission No. PS06

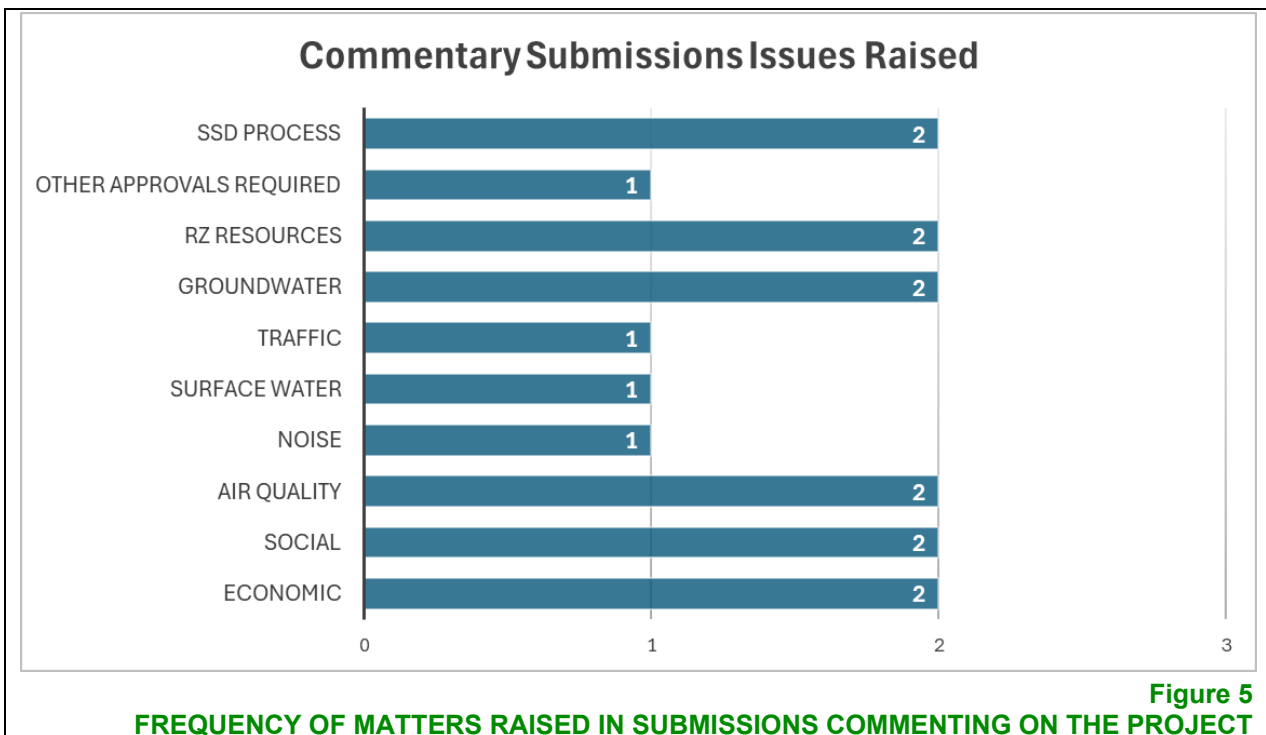
Response

The Applicant acknowledges the submitters' comments related to the positive impact the Project would have on the local and regional economy, in particular the generation of local employment and economic benefit to local business. As discussed in Section 6.15.5 of the *Amendment Report*, the updated Economic Impact Assessment determined there would be a direct employment of an additional 480 fulltime equivalent (FTE) positions during construction and 240 FTE during operations. The Project would also generate additional benefits to the local economy and would stimulate indirect economic activity within the local area via both wage and non-wage expenditure. Additionally, during operations, the Project is expected to contribute approximately \$9.6 billion to the Wentworth LGA economy over the life of the Project.

5.3 Submissions – Comment

5.3.1 Introduction

A total of five submissions provided comments for consideration, and raised various matters related to the Project. These submissions generally raised specific concerns and/or acknowledged the benefits of the Project for the local community such as employment, economic investment and improved social services. **Figure 5** displays the frequency with which the listed matters were raised by the submitters who provided comment on the Project. The following subsections provide a commentary regarding the matters raised.



5.3.2 SSD Process

Representative Comment(s)

I have a concern that any delays in delivering this project could allow benefits to the Wentworth Shire and the State of NSW to bleed away to Victoria.

Peter Family, Merbien, Victoria - Submission No. PC04

Response

The Applicant acknowledges the Submitter's concerns and is working with relevant NSW and Federal government agencies, as well as with investors, financiers, suppliers and customers to bring the Project online as expeditiously as possible.

5.3.3 Other Approvals Required

Representative Comment(s)

Disappointing Access Agreements haven't been forthcoming as I thought this was a requirement of the Mining Act. I received an indemnity form April 24th to cover surveyors doing cadastral work on an easement.

Phil Larwood, Anabranth South, New South Wales - Submission No. PC01

Response

The Applicant notes that access agreements are in place to cover all Project-related activities that are currently or have previously been undertaken. The Applicant is currently negotiating a commercial agreement with the submitter which will include arrangements for land access and commits to ensuring that an agreement will be finalised prior to Project-related activities commencing.

5.3.4 RZ Resources

Representative Comment(s)

The applicants support for the community thus far has been well received. And they have thus far shown that they are a community minded prudent operator. That they expect to invest further in the town and community and become a major employer of locals has to be welcomed and promoted positively.

Name Withheld, Wentworth, New South Wales - Submission No. PC03

Response

The Applicant acknowledges the submitter's comments related to the positive impact the Project would have on the local and regional economy, in particular the generation of local employment and economic benefit to local business. As stated in Section 6.15.8 of the EIS and Section 6.15.8 of the *Amendment Report*, the Applicant is committed to implementing a local employment and procurement process that would:

- give preference when engaging new employees to candidates who live within the Wentworth LGA;

- give preference to suppliers of equipment, services or consumables located within the Wentworth LGA;
- encourage and support participation of potential locally-based employees and contractors in appropriate training or education programs to build capacity within the surrounding areas; and
- encourage and support participation of the Aboriginal community and organisations in Project-related employment and supply services.

5.3.5 Groundwater

Representative Comment(s)

From Economic Impact Assess 6.6 : " The Mining activity has the potential to significantly impact on ground water resources in the project area." The mine is in close proximity to Lake Victoria & the ground water moves North to South towards the lake & Murray River

Phil Larwood, Anabranh South, New South Wales - Submission No. PC01

Response

The Applicant acknowledges the submitter's concerns regarding impact on groundwater resources within the Mine Site. In response to this concern, interference with groundwater resources within the Mine Site has been addressed in Sections 5.4.8 to 5.4.10 of this report. In addition, the updated Groundwater Impact Assessment, presented a Appendix 4 of the *Amendment Report* states at Section 12.5 that "The Project would have no effect on Lake Victoria, which is elevated above the saline groundwater table." (GEO-ENG, 2025)

Representative Comment(s)

Belmore Farms has two registered bores (GW004716 or GW004701), in section 6.2.2.3 of the EIS documentation they are noted as:

- *GW004701- not recorded/not found*
- *GW004716 -Active*

Whilst it is understood that the bores registered to Belmore Farms do not rely on the upper aquifer, can RZ Resources provide further information in relation to the Trigger Action Response Plans (TARPs) to address unanticipated groundwater impacts and if this would extend to possible impacts to these bores.

Belmore Farms - Submission No. PC05

Response

This matter was discussed with the submitter on 28 May 2025 and a commitment was made to monitor bore GW004716.

Trigger Action Response Plans (TARPs) to address unanticipated groundwater impacts and mitigation and management measures to address potential impacts on beneficial use of the bores would be detailed in the *Water Management Plan*, to be prepared following Project approval.

The Applicant would ensure that the owners of surrounding bores, including GW004716, are approached during preparation of that Plan with a view to collecting further a baseline data for those bores that are able to be located. The Applicant would also provide surrounding landholder with the opportunity to comment on proposed TARPs related to their bores during preparation of the Plan.

5.3.6 Traffic

Representative Comment(s)

Belmore Farms would like to ascertain the following information in regards to the proposed road closure of Nulla Rd:

- *What arrangements will be made to ensure ongoing access to light vehicles? What operational controls would be put in place to ensure Belmore Farms could continue to use this road?*
- *What compensation arrangements will be forthcoming for additional travel time/cost when the road is inaccessible by both heavy and light vehicle movements? How will this be administered?*
- *Can RZ Resources provide any demonstrable evidence that the closure of Nulla Rd will be kept to a minimum*

Belmore Farms - Submission No. PC05

Response

As Nulla Road is no longer proposed to be closed, there would be no access-related impacts on the users of Nulla Road.

5.3.7 Surface Water

Representative Comment(s)

Belmore farms is seeking to have baseline conditions of their dams assessed and agreed so that any monitoring can identify impact to the Belmore Farm dams. This would include commencement of quality and level monitoring as soon as possible.

It should be agreed that any loss of integrity of the dams and subsequent reduction in storage capacity could be considered in terms of loss of agronomic productivity.

Details of potential remediation and/or compensation actions for loss of water quality or volume should be agreed on by Belmore Farms.

Belmore Farms - Submission No. PC05

Response

This matter was discussed with the submitter on 28 May 2025 and the Applicant committed to monitor the quality of surface water within farm dams on Belmore Station and would approach other neighbouring landholders on properties adjoining the Mine Site prior to the commencement of construction.

During construction and operation of the Project, impacts on surface water quality is likely to be negligible, as clean run-off would be directed away from Project-disturbed water via flow bunds that would be located across the basal areas of each salt pan's depression at the boundaries of the disturbance area.

Nonetheless, as stated in Section 6.7.3.5 of the EIS, the Applicant would implement contingency mitigation measures should the quality and/or quantity of surface water available for neighbouring landholders be adversely impacted by the Project.

Detailed management, mitigation and remediation/compensation measures, will be detailed in the Project's *Water Management Plan*, to be prepared following project approval. In addition to the above, these may include:

- Pre-commencement and ongoing monitoring of surface water storages (quality, capacity and catchment).
- Make good provisions in the event that the Project adversely impacts on surface water quantity or quality, including immediate supply of makeup water in the event of a suspected adverse impacts while further enquiries are undertaken.

5.3.8 Noise

Representative Comment(s)

Belmore Farms would welcome the installation of a noise monitoring station adjacent to the Belmore Farm Homestead, or at a mutually agreeable location.

Belmore Farms would like to see and agree on a Trigger Action Response Plan (TARP) that includes details of the monitoring and management program and what actions if noise compliance levels at Belmore Farm is breached?

Belmore Farms - Submission No. PC05

Response

The Applicant met with the submitter on 28 May 2025 and it was agreed that with the proposed amendment to the Project and the fact that proposed mining operations would be at least 9.8km from the submitters residence that noise was unlikely to be an issue. Nevertheless, the Applicant has agreed to undertake attended noise monitoring on request (see Section 4.8).

Finally, the Applicant would prepare a *Noise Management Plan* for the Project, which would include noise monitoring locations, techniques and frequencies, as well as a Trigger Action Response Plan. The Applicant would ensure that surrounding landholders are consulted in relation to preparation of the Noise Management Plan and Trigger Action Response Plan.

5.3.9 Air Quality

Representative Comment(s)

Moving dirt particles can travel large distances enabling it to contaminate domestic [settling on roof tops then washing into tanks used for showering & drinking] & stock water. This could have serious results on a family's health & contaminated stock water could seriously impact our meat & wool markets. Dust movement doesn't stop at the boundary fence as seen in dust storms hitting Melbourne or Sydney.

Phil Larwood, Anabranth South, New South Wales - Submission No. PC01

Response

The Applicant acknowledge the submitter's concerns regarding impact on dust emissions as a result of the Project, and subsequent impacts on surface water quality surrounding the Mine Site. The Applicant's response to this concern has been addressed in Sections 6.9 and 6.12 of the *Amendment Report* and Sections 5.4.19, 5.4.20 and 5.4.22 of this report.

Representative Comment(s)

Belmore Farms would welcome the installation of dust deposition gauges adjacent to the Belmore Farm Homestead, or at a mutually agreeable location.

Belmore Farms would like to see and agree on a Trigger Action Response Plan (TARP) that includes details of the monitoring and management program and what actions will be taken if air quality compliance levels at Belmore Farm is breached?

It should be agreed that any air quality impacts that result in a reduction of quality of pasture soils, which subsequently could lead to a reduction in productivity needs to be detailed including measurement, remediation and compensation arrangements.

...

Section 6.14.7.3 of the EIS (Anxiety and Personal Safety) details that RZ Resources will ensure that project-related activities do not adversely impact on livestock fodder on non-project related properties adjacent to the Mine Site. Can RZ Resource confirm how this will be achieved and measured and any specific mitigations that would be proposed to protect impacts to Belmore Farms livestock?

Belmore Farms - Submission No. PC05

Response

The Applicant met with the submitter on 28 May 2025 and discussed dust and radiation-related matters. The Applicant agreed to provide additional information in relation to radiation-related impacts on agriculture and livestock and the Radiation Assessment as it related to non-human biota was amended to specifically address the submitter's concerns.

In light of those discussions and the fact that the amended Mine Site is more than 9km from the submitter's property, the Applicant contends that installation of deposited dust gauges would provide limited useful information.

The Applicant would consult with the submitter during preparation of the Air Quality Management Plan for the Project, including in relation to TARPs to address compliance and other impacts, including soil contamination.

5.3.10 Social

Representative Comment(s)

This town, our schools, healthcare facilities and local businesses are suffering and any push back on new opportunities such as this project is folly.

Name Withheld, Wentworth, New South Wales - Submission No. PC03

Response

The Applicant acknowledges the submitter's comment and is supportive of the Project's potential for the enhancement of social services in the local community. As stated in Section 6.15 of the *Amendment Report*, the Project would, if approved, result in substantial positive impacts in the wider community in terms of continuation of employment, workforce and supplier expenditure, and community investment and cohesion, and improvement of infrastructure and services, with many of these benefits also expected to be experienced by the local community.

Representative Comment(s)

What reporting mechanism will be available should loss of amenity be?

...

Belmore Farms would like to ensure that any biosecurity arrangements that are specific to Belmore's operations are included in a biosecurity management plan that is either specific to Belmore Farm (like what is in place for Warick Station) or a company generic one. Belmore Farms would like to be consulted through the development of this plan and any specific arrangements should be included.

...

Measures that could be included in the mitigation strategy for social impact - including increased signage, security and neighborhood watch type activities. Belmore Farms would seek to have these mitigations consulted and agreed with RZ Resources prior to operational start.

Belmore Farms - Submission No. PC05

Response

The Applicant would implement the following Project-wide measures to address the matters identified above.

- Complaints Reporting

Following approval, the Applicant would implement specific complaints reporting requirements, which would be detailed in the Project's *Environmental Management Strategy*. In summary, complaints may be received directly via telephone, email or web form from RZ's website, or indirectly via relevant government agencies. Upon receipt, the name and contact details of the complainant and the nature of the complaint would be recorded. The Applicant would then investigate the complaint and implement system improvements if required. The results of the investigation would be communicated back to the complainant.

- Biosecurity

The Applicant met with the submitter on 28 May 2025 and discussed biosecurity-related matters. During that meeting it was agreed that the Applicant would:

- comply with landholder’s Biosecurity Plan when accessing private property; and
- consult with surrounding community when preparing the Biosecurity Plan for the Project

- Social Risks

As stated in Section 6.13.3, the Applicant would implement a range of mitigation measures to ensure social risks associated with the Project are managed effectively. This includes the preparation of a *Landholder Relations Plan*, including a landholder communications and engagement strategy, and a program for the ongoing analysis of social, security and personal safety risks arising from the Project.

5.3.11 Economic

Representative Comment(s)

At the local level, the employment opportunities offered by the RZ Mine will deliver benefits that will strengthen our community.

Peter Family, Merbien, Victoria - Submission No. PC04

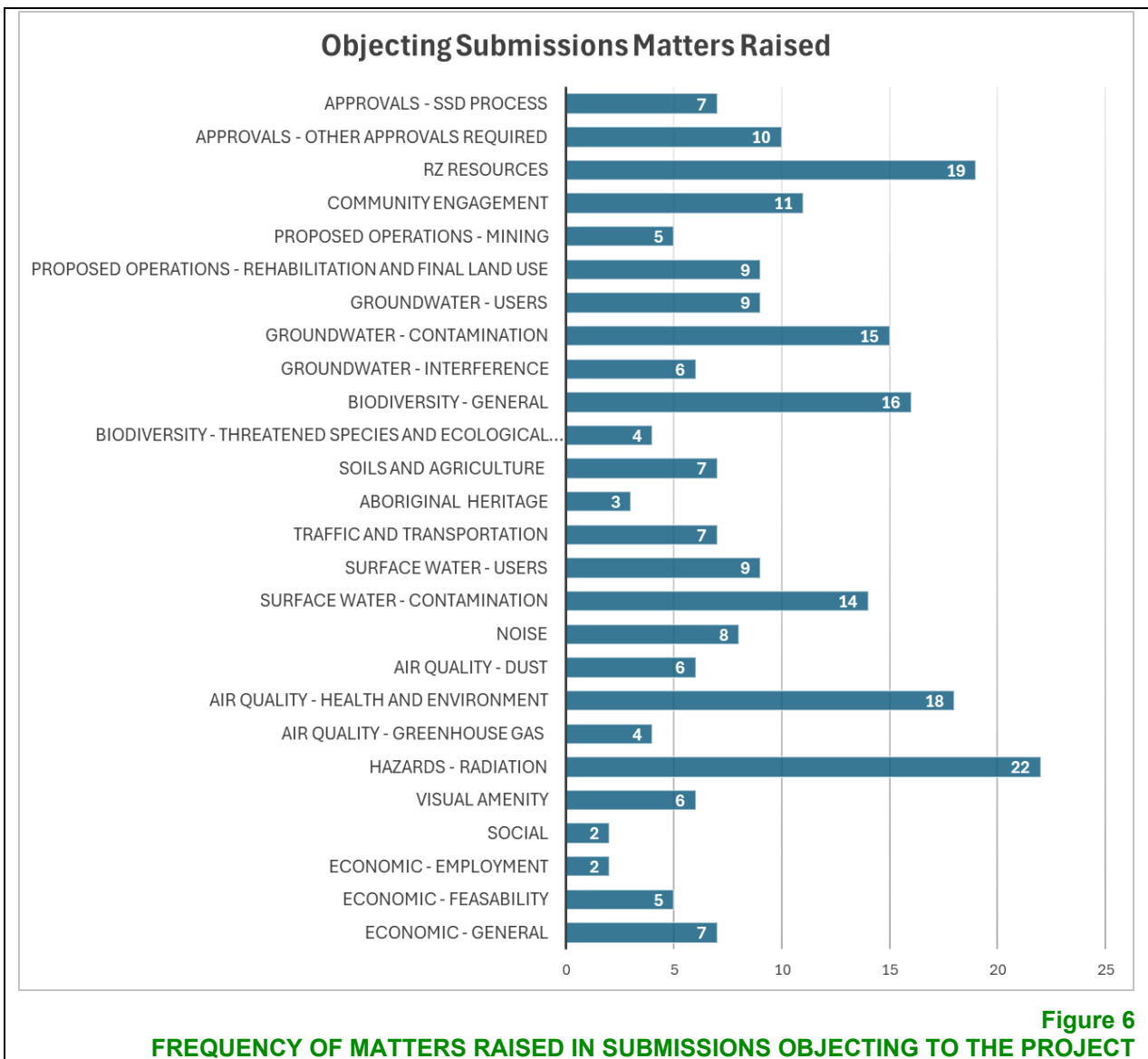
Response

The Applicant acknowledges the submitter’s comments related to the positive impact the Project will have on the local economy, in particular the generation of local employment and economic benefit to local businesses. As discussed in Section 6.15.5 of the updated Economic Impact Assessment, there will be a direct employment of an additional 480 fulltime equivalent (FTE) positions during construction and 240 FTE positions during operations. In addition, the Project would generate additional benefits to the local area economy and stimulate indirect economic activity within the local area via both wage and non-wage expenditure.

5.4 Submissions – Objection

5.4.1 Introduction

A total of 37 submissions provided objections to the Project. The submission raised a wide range of matters related. **Figure 6** displays the frequency with which the listed matters were raised by the individuals and organisations who expressed their opposition to the Project. The following subsections provide a commentary regarding the matters raised.



5.4.2 Approvals - SSD Process

Representative Comment(s)

Landowners and community members are severely disadvantage with EES process, they don't have the financial or technical resources to compete with a large corporate business, who are very much favoured in this process. All studies carried out are done by the developer using their

own favourable consultants with no limit on time to prepare, to be fair these should be carried out by independent experts, and peer reviewed. Objectors on the other hand are given only days to read and research the EES, this inhibits the people who will have to live with the consequences from the mining activity, including loss of livelihood for future generations, to adequately defend themselves and the environment.

Nola Bennett, Lalbert, Victoria - Submission No. PO16

I have spent the equivalent to four full days on this EIS and probably need to spend four more but do not have the time.

...

We had a meeting on the 16th of June and found a lot of local landholders knew nothing of the mine. The EIS process is discriminatory toward interested parties as time is on the mining companies side. I have done my best to review this document because I have been involved in several others. A lot of landholders were daunted by the report and will probably not have access to the appendices, these are the true information. I have categorised the comments under appropriate headings and hope that my concerns get to the appropriate reviewers.

Name Withheld, Rufus, New South Wales - Submission No. PO19

Reviewing this EIS of several thousand pages in 28 days places my family and I at a distinct disadvantage.

...

I have no experience commenting on EIS' so I spent some time reviewing the Goschen Mineral Sands project planned in Victoria. The Goschen project plans to mine the Loxton Parilla Sands deposit, as does the Copi project. I have tried to compare the EES for the Goschen project with the EIS for the Copi project. The Copi EIS lacks details contained in the Goschen EES (for example detailed radiation report, salt balance report), making me believe the Copi EIS is an inferior quality EIS. Expert reviews of the Goschen EES raise serious concerns about the water, radiation, noise and air quality risks anticipated with the Goschen mineral sands mining project. I anticipate that the Copi project will have similar risks to the Goschen project, given the similarity in sand deposits.

...

Trying to review the EIS is extremely stressful. We had 28 days to review a document of several thousand pages, and try to articulate the impact it will have to our family and business. RZ Resources has had years to prepare these documents, and has communicated very little information to us in those years. Most of the EIS information was new to us. The process disadvantages us and is unfair.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

The EIS has a LOT of 'flexible elements', there is a lot of terminology like: this may, this should, will likely, cannot be described with certainty, anticipates, may not be available, and so on. This unspecific detail means we cannot properly assess the project and its impacts to our health and business.

...

This objection is not my complete objection. I have had limited time to read the EIS and prepare my objection. I have many more concerns that I have not been able to document here. I have requested an extension to submit my objection, but this has not been granted. I reserve the right to raise further issues and objections as more information comes to my attention.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

The proposed project EIS is full of mistakes and contradictions, most studies they have only carried out as desktop studies and therefore are scientifically inaccurate.

Name Withheld, Meadow Spring, Western Australia- Submission No. PO34

The proponent has exhibited 27 documents as a report or plans as one component of the EIS documentation. The documents are some 3000 words in length with accompanying chart and graphs.

As the BDEC has only held these documents for around 14 days it is not possible to scrutinise each document in detail. It is therefore possible that comments by the BDEC might contain an inaccuracy or contain an error in a conclusion regarding a particular document if the BDEC has missed a detail in a certain document.

It is of course also not possible to research all of the science or engineering claims that the proponent or their consultants have put forward in the limited time available.

...

To the effected community, the EIS process should be managed under the rules of natural justice rather than as a legal process.

It is unreasonable to expect that the effected farmers would have a reasonable opportunity to examine the ~3000 pages of the submitted documents and determine how that might affect them or interact with their farming operations within the 28-day period available for submissions.

It is also unreasonable to expect that the effected farmers would be able to garner the financial resources in such a short period of time to either source their own scientific or expert witness reports, or to fund legal representatives especially if there was the opportunity for a Panel Hearing.

As the proponent has chosen either through expedience, or incompetence, to submit documents that are variously incomplete, or inadequate, missing or misleading in some important areas such as human health risk, it would be reasonable that Major Projects do not advance the EIS until complete documents have been lodged by the proponent.

It would also be reasonable that the effected community should not be held to the constraints of the minimum number of objections requirement before they are provided the opportunity to present at a Panel Hearing.

Given the size of the farming properties/stations and the remote location of the community, the ability to garner the required number of objections to qualify for a Panel Hearing potentially places an unrealistic requirement on the community that will disadvantage their ability to defend their homes and livelihoods.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included but may not be limited to:

- the short period of time available to review and comment on the EIS and associated documentation;
- the technical nature of that documentation and challenges associated with reviewing and responding to the information presented; and
- a perceived lack of procedural fairness.

The Applicant acknowledges the challenges for community members to review and assess the EIS and associated documentation, noting in particular the technical nature of the documents and the limited time available. However, it is noted that the content of the EIS and the exhibition and submissions process is managed by the NSW Government in accordance with the requirements of the *Environmental Planning and Assessment Act 1979* and associated Regulations and Guidelines and is not a matter within the Applicant's control.

In order to facilitate and assist community members to understand the Project and to assist their review of the EIS and associated documentation, the EIS was, to the extent practicable, drafted in plain English in a manner that could be read and understood by a non-expert reader. The Applicant also provided the following opportunities for the community to be informed about the Project prior to exhibition of the EIS and to ask questions and raise concerns. See also Section 5.1.2 and Table 5.2 of the EIS.

- Engagement with surrounding and directly impacted landholders has been ongoing since 2017, a period of 7 years, including offers of in person meetings with the author of the EIS. The purpose of those meetings was to allow directly impacted and neighbouring landholder to directly ask questions of the EIS author.
- Wider community engagement has been ongoing since 2018, with the Applicant present at every Wentworth Show and major community event held since that time, noting that COVID19 prevented a range of community events from proceeding in 2020 and 2021. Immediately prior to exhibition of the EIS, the Applicant held community drop-in sessions for the Project in Wentworth on 11 and 30 April 2024.

The session on 11 April 2024 was attended by the authors of Submissions PO30 and PO34. Offers during that event by the author of the EIS to provide a briefing on the content of the EIS and assessment outcomes and to answer questions were not accepted.

Community notifications for that session were not provided in time to allow the community to attend that session. As a result, a second session was held on 30 April 2024 and ten community members attended, including business owners and first nations people.

Since the exhibition of the EIS, the following engagement has been undertaken (see also Section 5.2 of the *Amendment Report*).

- The Applicant opened a shop-front office in Wentworth on 22 August 2024. Approximately 30 members of the community attended the opening of the office. The office is staffed during normal business hours, with personnel available to answer questions about the Project.
- A range of meetings have been held with individual landholders and community members throughout the later half of 2024 and the first half of 2025.
- The Applicant manned a stall at the Wentworth Show in August 2024 and spoke to approximately 24 individuals or groups of individuals during that time.
- The Applicant held a community drop-in session at its office in Wentworth on 15 May 2025. Approximately 25 community members attended, including owners of land surrounding the Mine Site, the local Aboriginal community and interested members of the public.

In light of the above, the Applicant contends that it has done all that could reasonably be done to facilitate review of the Project by the community.

5.4.3 Approvals - Other Approvals and Agreements Required

Representative Comment(s)

I have questioned RZ about the Exploration licences and was told that they were truncating the two mining exploration leases back up to half way up Nulla station. I have been watching mines view for these changes to occur, but it shows no sign of change to date. Therefore I feel this will be an issue for us in the future.

Name Withheld, Rufus, New South Wales - Submission No. PO19

'If no agreement is reached mining would not be undertaken on that property'.), we request there be a condition imposed that:

'RZ Resources must not carry out any development work on either or both of Sunshine and Huntingfield stations until after the settlement of a purchase, lease or licence of these properties from the owner'.

...

It is unclear to me whether the entire EIS is based on mining on our property or not. As an example, on the one hand maps and definitions in figures 1.1 and 1.3 show the deposit and define the "Mine Site" as including the mine on our land. Yet in section 2 on page 2-17, RZ says it will not be mining on our land without our consent. We have not given our consent and at this point in time do not intend to give our consent .

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

Significant work and improvement has been made to these stations to run this successful business. These stations are covered with items defined in the Mining Act 1992 (NSW) as "agricultural land" and "significant improvements" in relation to which we have exercised our rights under the Mining Act to protect. The consequence being that a mining lease may not be granted over the land upon which is situate this agricultural land and our significant improvements. These objections do not appear to have been mentioned in the Applicant's EIS. Assuming our objections are sustained, approximately 1/3 of the western side of MLA 629 would not be granted.

...

RZ was trespassing through our paddock to get to a neighbouring farm. They did this without an easement and without our permission. We asked RZ to stop. RZ told us if we wanted them to stop we should get an injunction. This trespass continued for many months, and involved many vehicles each day, some days we counted 15 vehicles. The trespass would stop on days the NSW Resources Regulator would be doing site inspections, but resume as soon as the Regulator had left the area.

...

RZ Resources has not negotiated anything. They have drawn us into Arbitration, bound us in a confidentiality clause, and this process is now nearing 12 months.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

The mining proposal area which includes Huntingfield and Sunshine properties should not be included in the EIS as RZ Resources do not own nor do they have access agreements in place for these properties.

...

Perhaps RZ Resources should negotiate with the owners of Huntingfield and Sunshine Properties about ownership and access and proposed land used before a dam removal on land RZ Resources don't own.

...

ES page 19 states negotiations of commercial agreements with all directly affected land holders. It also suggests good neighbor agreements. How can this even be considered in the EIS when the proposed mine is partly on land that RZ Resources have failed to secure any agreements with notably Huntingfield and Sunshine properties. There is no ongoing agreements on surrounding properties where radioactive dust and heavy metals may affect the long-term viability of these properties due to Bio Security concerns. These contaminants are considered over and above a Sand Mine as it is proposed.

...

It RZ Resources wish to press forward with this proposal then they should be prepared to purchase the land around the mine at inflated values.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

If Copi are to export their HMC or REC direct to China they could reasonably be seen to be in direct conflict with Australia's Critical Mineral Strategy and against Australia's sovereign interest.

...

In the Risk Assessment 6.11.2.3 document, the proponent claims that the handling of concentrate at the port or the Pinkenba processing facility 'is beyond the scope of this report'. However, the attached image at the end of this document appears to show the bulk handling of concentrate on a conveyor belt at a location immediately adjacent a highly utilised public area and must cause doubt that this processing facility could be granted an operating licence

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Impacts on Huntingfield/Sunshine Stations
- Approval for sale of products to China.
- Operation of the Pinkenba Processing Facility.

Impacts on Huntingfield/Sunshine Stations

The Applicant notes that the Project has been amended to exclude Huntingfield and Sunshine Stations from the Mine Site and no surface disturbing activities are proposed within the properties. As a result, a range of the matters raised above are no longer considered relevant to the Amended Project.

In relation to the alleged trespass, the Applicant notes the allegation concerns the use of an existing access track connecting Nulla Road to Warwick Station, which traverses a section of Nulla Station that is nominally operated as part of Huntingfield Station.

This access track had been in long-standing use and, at all relevant times, RZ either held a valid sublease of Warwick Station or acted through its wholly owned subsidiary, Wentworth Pastoral Company, following its purchase of the property.

On the basis of this tenure, the Applicant understood that it had appropriate rights to use the access route and that holders of Western Lands Leases are under the terms of their lease are not entitled to deny or unreasonably restrict access to a public road.

Notwithstanding this understanding, the Applicant has since taken steps to relocate the access track to avoid any further concerns.

Approval for sale of products to China

This is not a matter relevant to the application for development consent. Notwithstanding, the Applicant notes that the Commonwealth government has powers to control trade with foreign powers and the Applicant would comply with any orders issued under those powers.

Operation of the Pinkenba Processing Facility

The operation of the Pinkenba Processing Facility is not a matter relevant to this application for development consent for the following reasons.

- The facility is located in Queensland, not NSW.
- The facility is the subject of separate approvals administered by the Government of Queensland.

5.4.4 RZ Resources

Representative Comment(s)

"If they couldn't do the right thing as an exploration company, I have a great fear that they won't be able to manage that if they ever become a big operation," Mr Vagg said. "You can't trust them and you don't have any faith that they'll abide by the rules." Documents obtained under the NSW Government Information Public Access Act show RZ Resources received an official caution and a penalty notice from the NSW Resources Regulator in 2021 for providing false and misleading information to the regulator.

Name Withheld, White Cliffs, New South Wales - Submission No. PO13

1. RZ resources have demonstrated a willingness to flout regulations during the exploration phase. This can either be due to not being aware of the regulations, or that they were aware of the regulations. Either way they have satisfactorily demonstrated that they are not a fit and proper organisation to be entrusted with a project of this nature.

James Robertson, Renmark, South Australia - Submission No. PO18

Negotiated agreements and good relations

Negotiated agreements, these appear to be only known to RZ Resource staff as the local landholders were all of the opinion very little progress had occurred in this area. As at the 16th of June 2024.

Land ownership 2.2.3.1 Mine site, this states false claims it infers the almost there approach. when these landholders spoke, it was very clear that it was only an initial meeting with no clear outcome. How can a company display such good communication skills on paper but such poor on ground negotiation. The Huntingfield/Sunshine fiasco would not have occurred if correct exploration lease protocol had been followed as an agreement would have been sought prior to works or entry. The Applicant needs to questioned in this area and the landholders need to be consulted to ground truth the happenings. RZ resources has had problems with the resource regulators under the mining act and it states in this document they have improved moving forward. It appears this not to be the case.

The section 5.1.2.1 should be deleted or reworded to encompass what has actually been engaged as the majority of landholders were not aware of anything going forward from the initial sit downs and response. The writer appears to be ahead of the on-ground reality.

...

The Applicant

RZ resources were reprimanded by the Resources regulator in 2020 for compliance breeches of their exploration activities. Potential contravention of the mining act 1992 and exploration codes. In March 2023 the resource regulator and the applicant agreed to an enforceable undertaking under the mining act to improve going forward. This puts into question why this needed to occur, landholder moral is not great in relation to what is happening, a great deal of transparency and landholder relations needs to exist not infer. The community relations isn't just a paper only item.

Name Withheld, Rufus, New South Wales - Submission No. PO19

Representative Comment(s)

I feel that RZ Resources has a poor social licence.

...

My family has many examples of RZ Resources having poor regard or care for the impact they have to us. Please see my husband's (Shane Vagg) objection for many examples. Some issues we have experienced with RZ

include RZ staff bringing and firing a firearm on our property, hundreds of examples of trespassing across our property to get to Warwick for months without our consent or complying with the Mining Act until we had to call the police, attempts at intimidation by telling us they would compulsorily acquire our farm and we had no choice, numerous continuous breaching of the access agreement for example by repeatedly going into and remaining in no go zones, preventing our stock access to water, creating roads to drill sites then telling the Regulator that we created those roads so RZ didn't have to rehabilitate them (We thought it was obvious that these roads had been created by RZ as they align with the drill sites. There are approximately 80kms of these roads. The regulator did not think so).

RZ have sought to unilaterally vary the agreed access agreement by using s157 of the Mining Act by saying that my husband sought a variation which he did not. We have objected. Despite this the arbitration continues. RZ have failed to say what variation it is seeking. Meanwhile we are dragged through this s157 process against our will and have to pay our own costs. It appears to us outrageous that RZ can unilaterally vary an agreed access agreement and make us pay for it. I believe that RZ's actions are an abuse of process but we can't get out of it.

Does RZ plan to share their profits with the community? RZ has caused us many thousands of dollars in legal fees simply to protect ourselves, our business and our property. They certainly have not offered to pay our legal fees incurred for their project which may not even go ahead. Do they plan to have a community benefit fund to support local groups and organisations? I have not seen one. Have they even thought about this? My experience is that RZ has a poor corporate culture. RZ's lack of consideration to my family living in close proximity to the mine, and a lack of attention to the surrounding community is evident to me. RZ have not considered the project impacts to our drinking water supplies or those of our neighbours.

...

In my opinion RZ Resources is not a fit and proper applicant to run a project such as the Copi project. Their existing track record, and their treatment of my family are not ok... I don't believe RZ has the credentials or social licence to run a project like this.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

Representative Comment(s)

I object to the project based on our family house being 1.3km from the mine pit. The applicant, RZ Resources (RZ) has tried to scare us into selling our farm to them, with several verbal threats of forced acquisition.

...

We have known RZ Resources since 2018. At that time RZ called themselves Relentless Resources. RZ have breached mining legislation (Act/Regulations) on several farms/exploration licences. RZ has never run, owned or operated a mine before. They are a new company with limited experience and limited financial resources. We believe that RZ has a poor corporate culture, evidenced by repeated failures to follow mining legislation, and our personal experiences dealing with RZ.

RZ has made several offers to buy our farm. These offers have been unsolicited and usually arrive by email after no discussion. There has been no 'negotiation' in the true sense of the word. RZ made an offer to buy our farm at a meeting, we rejected the offer on the spot. RZ told their local staff about some details of that offer (including the price offered) and this information travelled through our local community. RZ would email us about sensitive information, and link local staff into the emails.

In late 2023 we received an unsolicited offer to buy our farm from RZ by email. We had 2 solicitors review the offer and both advised there were terms/clauses in the offer that were very unfavourable to us, and that we would be crazy to accept the offer. RZ gave some details of this offer to members of our local community. We have been approached by many community members to ask us about this offer. These community members tell us where they heard the information and ask us why we were so crazy not to accept it. These community members did not see the entire offer, and the loopholes RZ had included in the offer to disadvantage us.

...

RZ has had high staff turnover in the years we have known them. We have been approached by several ex-RZ employees who felt we should know about some incidents that happened. Some of these incidents include RZ staff failing drug tests but being allowed to continue to work on our farm, RZ staff member bringing a firearm onto our farm and firing it, RZ staff arranging meetings with our neighbours but not meeting with us, RZ staff noting our movements/activities, photographing us working on our property and recording conversations with us.

...

We gave permission for an Aboriginal Cultural Heritage survey over certain areas of our farm. We excluded access to some paddocks as our goats were having kids (babies). RZ went into some of those paddocks anyway. Then argued with us that we had given permission. RZ emailed us to tell us they were not going to harm our goats by being in those paddocks, so apparently RZ knows more about goats than we do. There has been an RZ attitude that our business doesn't matter.

On one occasion RZ sent a contractor to our farm in February, in the middle of summer. The contractor rode back and forth through some paddocks mapping them in a buggy. This had not been communicated to us clearly by RZ. At the end of the day, the contractor would park their buggy near the water trough for the paddock. The goats would not come in for a drink of water, it was extremely hot. We took photos and asked RZ to have the contractor move the buggy. The next day we found the buggy parked in the exact same place, preventing our stock from getting to water again. There were several emails back and forth. This risked our livestock and took up our valuable time.

...

At the 2023 Wentworth Show, other landholders/neighbours saw us and we discussed RZ Resources. These landholders told us that at the show they had been told by RZ that my family were causing RZ lots of troubles, and that RZ had offered us enough money to retire on to buy our farm off us. This is the sort of community consultation RZ Resources conducts.

...

We attended the community information session on 11th April 2024 and asked a senior RZ staff member about RZ providing false and misleading information to the government, he denied this had ever happened, he denied it multiple times when asked. We know that RZ has been found guilty of providing false and misleading information. RZ has misrepresented themselves to the community and in the EIS, by calling a fine a community support donation. This would not comply with community views or the 'pub test'.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Representative Comment(s)

This mining company does not follow or comply with environmental and mining regulations or consult with the farmers who own and farm this land. I understand this company has never ran a mining site, they have no experience. Why should farmers let them practice risky mining techniques that WILL substantially damage and interrupt the landscape?

Michelle Vagg, Mildura, Victoria - Submission No. PO35

Representative Comment(s)

As a first-time mining company, there appears to be considerable uncertainty about the proposal.

...

RZ Resources appear to fail at the first hurdle to secure a social licence, which can be as important as a mining licence or an EPA development or operating licence.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Performance of the Company during exploration operations
- Consultation with landholders

- Use of firearms on neighbouring land.
- Community benefits
- Confidentiality of discussions
- Compliance with requests related to land access
- Absence of prior mining experience

Performance of the Company during exploration operations

Section 1.4 of the EIS describes two investigations by the Resources Regulator into the Applicant's exploration operations as follows.

- The first related to an investigation that commenced following an on-site audit in late 2020. A range of contraventions of the Act were alleged. The Applicant actively engaged with the Resources Regulator in good faith to rectify and prevent a recurrence of the alleged breaches of the Act. Measures implemented to facilitate an improved performance and ensure compliance with commitments and requirements related to exploration operations, included:
 - engagement of additional staff to manage the Applicant's exploration operations;
 - improved training and onboarding of staff; and
 - purchase of equipment to reduce reliance on external contractors.

In March 2023, the Applicant agreed to an enforceable undertaking that included the following.

- Purchase of software to facilitate better management of exploration operations.
- Provision of funds to permit development of industry-wide systems to facilitate management of exploration operations.
- A donation to Wentworth Shire Council to construct community infrastructure.

The Applicant notes that the majority of the measures required under the enforceable undertaking were voluntarily completed prior to entering into the undertaking. The Applicant has fulfilled all of the requirements of the enforceable undertaking. In April 2023 the Resources Regulator commenced an investigation into 50 alleged breaches of the Mining Act 1992, related to:

- failure to consult with landholders;
- failure to rehabilitate land or repair damage; and
- accessing landholder's land in the absence of a valid access agreement.

The Resources Regulator determined in all cases that the alleged breaches were not sustained.

In addition, the Resources Regulator has instigated further investigation in relation to three complaints since exhibition of the EIS . The complaints related to the Applicant's exploration operations as follows.

- Alleged dust, noise and other impacts from exploration activities on a neighbouring landholder, and alleged non-compliances with approved assessable prospecting operations (APOs).
- Alleged lack of community consultation and non-compliance with approved APOs and the Exploration Code of Practice: Community Consultation.
- Alleged non-compliance with approved APOs with respect to spoil pits and topsoil and subsoil management

The Resources Regulator reviewed the Applicants records and undertook an audit of exploration activities within EL9496 and EL8312 (see **Figure 1**). The investigation did not identify any non-compliances with mandatory requirements of exploration codes of practice or the conditions of approved APOs.

Consultation with landholders

This matter is addressed in Section 5.4.5.

Use of firearms on neighbouring land

The Applicant was made aware of the above allegation and investigated the incident. The investigation determined that no firearms were present. Furthermore, the Applicant has no need for its employees to carry or use firearms and would immediately act to have such firearms removed from company property if it became aware of their presence.

Community benefits

Sections 6.15.5 and 6.15.6 of the *Amendment Report* presents the economic assessment of the Project within the Wentworth LGA, including;

- direct creation of 480 jobs during construction and 240 jobs during operations;
- indirect support for 514 jobs during construction and 580 jobs during operations; and
- estimated total output of \$9.6 billion over the life of the Project.

In addition, the Applicant is in the process of negotiating Planning Agreements with Wentworth Shire and Broken Hill City Councils. It also has a long history of supporting local initiatives with community benefit, including sponsorship of the Wentworth Show.

Confidentiality of discussions

The Applicant treats all discussions with community members in strictest confidentiality and all employees are bound by confidentiality agreements. The Applicant and its employees are unaware of any disclosure of information that is not already in the public domain from other sources.

Compliance with requests related to land access

The Applicant has a policy of complying with landholder requests in relation to land access. For example, the Applicant has cancelled field surveys with no notice and reallocated field staff to other tasks at the request of neighbouring landholders on multiple occasions.

In response to the issue raised about a contractor parking a vehicle near a water trough, the Applicant notes that the property is in a remote location and mobile reception is poor. As a result, messages and instructions to staff and contractors can be delayed. While acknowledging the landholders request, the Applicant, notes that goats are regularly observed in close proximity to drill rigs and other equipment when staff arrive to work.

Absence of prior mining experience

The Applicant rejects the assertion that it lacks relevant mining experience, with the current senior management team collectively having over 100 years' experience in mineral sand mining operations.

5.4.5 Community Engagement

Representative Comment(s)

Negotiated agreements, these appear to be only known to RZ Resource staff as the local landholders were all of the opinion very little progress had occurred in this area. As at the 16th of June 2024.

The section 5.1.2.1 should be deleted or reworded to encompass what has actually been engaged as the majority of landholders were not aware of anything going forward from the initial sit downs and response. The writer appears to be ahead of the on-ground reality.

...

having been told that I was under a Mining leases without knowledge was not very nice. Then to be told it was only a squaring of the lease and in the last week to be told by a member of RZ resources that the lease would be truncated away from our property, I have become a little sceptical. Organised events in Wentworth have been poorly attended, possibly due to limited notification, this is an area that needs a massive amount of work in the future. Respect is the key to community engagement and trust, people will judge this.

The engagement strategy needs to be read by RZ and think where they haven't succeeded and do better not write every encounter as an engagement. The community isn't a solicitors office.

RZ resources needs to look at the Summary of Landholder engagements and ask themselves have they achieved this or is it for the EIS. The landholder meeting on the 16th of June indicated otherwise, and for short notice it was a massive rollup. The question I think needs to be asked is to whether the wider community has been consulted enough as they are probably of the same opinion as the landholders. The landholder meeting on the 16th of June 2024 also revealed people were scared to voice their opinion in this process for fear of future treatment, this must be stamped out.

Name Withheld, Rufus, New South Wales - Submission No. PO19

While it includes extensive government data, RZ Resources has shown minimal engagement with community concerns in the Wentworth area. Their efforts in this regard appear insincere at best.

Name Withheld, Hammond Park, Western Australia - Submission No. PO21

We have been given very little information on the project before the release of the EIS.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

We had to cease normal communication with RZ as we were being bombarded by RZ staff. Some days we would receive 6 or more phone calls from different RZ staff members. Some days we would receive more than 10 emails from multiple RZ staff members. This was not sustainable for us. Each staff member was wanting us to provide some information or approval for a different matter. We were trying to run our own business but found we had to spend much of our time dealing with RZ. RZ would email us saying we had said 'XYZ', but in reality, we had said 'ABC'. We had to spend time correcting RZ staff and correcting the record. The volume of communication, and the number of incorrect statements RZ was documenting from us was overwhelming. We have now directed RZ to send all communications to our solicitor, which of course costs us money as our solicitor has to read all communications.

...

The session was not advertised by RZ and was attended by 1 council member and ourselves.

...

RZ has never had a community consultation meeting, where they presented the same information publicly to a group of people/landholders, and offered the community an opportunity to publicly ask questions.

...

RZ mentions in the EIS that they anticipate resolving the conflict between ourselves and RZ. RZ commenced a dispute resolution process in 2022. We engaged in this process for months, with much legal advice required. RZ cancelled the process without a resolution. RZ then started an arbitration process in 2023, which continues today. We have not entered this process voluntarily, and have been bound by confidentiality about the process. RZ requested the process be paused for many months, but has recommenced the process in June 2024 within the 28-day period for us to read and respond to this EIS. The process of dispute resolution and arbitration has been at our own expense, this has cost a large amount of money in legal fees. The longer these processes go on, the more it costs us.

...

Our experience is of poor community engagement. RZ conducted aerial surveying over our property without any notification to us. The survey lasted hours, with a plane flying continuously back and forth over our house and property. We were not notified of this exploration activity.

...

RZ did not disclose much of the project detail, including the production and handling of radioactive material. So the community could not comment on what they did not know.

...

RZ has never communicated this to us, the owners of Huntingfield Station, reading the EIS is the first we were aware of this plan. We believe from reading the EIS the catchment area for some of our other dams will be affected, this does not seem to have been considered by RZ in the EIS.

...

Our experience as a project affected landholder has not been of regular consultation. We requested RZ provide all communication in writing to us via our solicitor. We have received 3 'Neighbour Updates' (2 page documents) providing information on the project since 2023, and RZ sends these to an old email address despite being asked to send correspondence to our current email address.

There are many things that RZ could have communicated to us but did not. RZ has changed their project design significantly over these 3 updates. It has been hard to know what is really going on from the limited information received by us.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Landholder agreements
- Accuracy of engagement summary in EIS.
- Frequency and nature of community engagement.
- Consultation with neighbouring landholders.

Landholder agreements

The Applicant has commenced discussions with a range of landholders in relation to commercial and good neighbour agreements. As indicated above, the Applicant treats those discussions as confidential and that the status of each is a matter between the Applicant and the landholder.

Accuracy of engagement summary in EIS

The Applicant maintains a community engagement register, with a record of each substantive discussion with community members included. The register currently includes over 750 individual consultation records. That data was used to prepare the summary of consultation presented in Table 5.2 of the EIS and Section 5.2 of the *Amendment Report*.

Frequency, nature and attendance at community engagement events

Section 5.1.2.2 of the EIS describes engagement with the wider community prior to finalisation of the EIS in April 2024 and Section 5.2 of the *Amendment Report* describes community consultation undertaken since that date. In summary, the Applicant's approach has been to provide a variety of opportunities for community members to engage with the Applicant's staff, including the following.

- Staffing a stall at every Wentworth Show since 2018, including participating in initiatives organised by the Show Committee to encourage attendees to visit and engage stall holders.
- Community drop-in sessions in Wentworth on 11 April 2024, 30 April 2024 and 15 May 2025.
- Opening and staffing a shop-front office in Wentworth where interested community members are able to come and ask questions and get information about the Project at any time during business hours.

In light of the above, the Applicant contends that it has done all that could reasonably be expected of it to engage and inform the wider community of the Project.

Consultation with neighbouring landholders

Submissions PO30 and PO34 indicate that consultation with them has varied from too frequent to negligible. As identified in Table 5.2 of the EIS, following a period of regular consultation with the authors of those submissions prior to 2022, communication since that time has primarily

been limited to email communication, and more recently email communication via legal representatives. The Applicant advised the authors of those submissions of visits by senior staff and the author of the EIS to Wentworth prior to the drop-in sessions in Wentworth on 11 April 2024 and 15 May 2025. In each case, offers were made to meet individually to be briefed on all aspects of the EIS and to have any questions answered. Those offers were not accepted however the authors of those submissions attended both drop in sessions.

5.4.6 Proposed Operations - Mining

Representative Comment(s)

The Off Path Storage area should be lined and totally exported back to the dredge pond if this cannot be done the mine needs to think this technique as ALL sand mines seem to leave a trail of destruction even though they have a hole proof system to begin with. The EPA liner policy should apply and the EPA should monitor this stringently.

...

Power Generation

This is a section that begins using a massive diesel generation plant, it is stated on page 3-17 that a solar farm may be built and that 30% of the power will be sourced from renewables from the start of the project, it also states that the power may come from a third party. The power line from the Broken Hill line may take four or more years to be constructed. I assume this section has not been well thought out. It needs major clarity as the solar farms take up a lot of area and they don't exist with trees therefore this should be in the EIS or it doesn't exist. Another aspect of the power would be whether the Broken Hill line has a surplus 66KVA up its sleeve, this usually isn't the case. The footprint from the power line should also be scrutinised in the EIS at some detail because of where it goes.

Water Supply

Potable water from reverse osmosis would need to be a very big plant indeed, the water sourced from the top aquifer is hyper saline therefore making it more difficult, The concentration mentioned in the EIS is twice as salty as the sea, I think this could be low as the NSW Water bore in the mine site has registered 120000EC units for years. The other aspect is that of heavy metals and radiation ore, one would need to be very stringent in testing this prior to any human or stock use. Wentworth Shire council had better have the ability to test this water if they are the governing body.

Name Withheld, Rufus, New South Wales - Submission No. PO19

The applicant has provided very limited information on the processing that is proposed. They admit that there are many 'flexible elements'. We cannot know the risk to our health, family, business and livestock from the very limited information provided. The limited information provided is consistent with a junior mining company with no previous experience operating a mine. The limited information provided shows no effort has been put into describing this process. This is a plan to make a plan relating to radioactive material!

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

There is very limited detail about how the minerals will be handled outside the dredge pond. At some stage these minerals will need to be dried out and handled.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

The logistics for the transport of HMC and possibly other products such as monazite to the New South Wales or Queensland coast are extended and energy consuming.

...

The Copi project has suggested it will provide an industrial plant for the separation of a Rare Earth Concentrate (REC). REC does not provide rare earth elements as market product.

...

It is possible that Copi could ultimately transport concentrates from their site to Western Australia for separation of rare earths. The operators of these plants are likely to have established a process which is compatible with the ore bodies before them and therefore not interested in modifying their plant for the lesser recovery rates that might be achieved from East Coast Loxton Parilla sand.

...

The proponent also appears to have neglected or avoided several steps which should be 'de rigueur' in a project with a substantial civil engineering content. The first step would be to construct a test pit which can provide considerable technical information.

...

A test pit can also provide material for the operation of a small sample processing plant which can provide a HMC sample which can then allow a more accurate determination of the JORC or economic value of the project.

It is not clear from the proponents' documentation how they have established the HMC characteristics which they have quoted or the provenance of any sample. It is also unclear how the proponent has determined the radiation emissivity of the HMC stockpile.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Lining of the Off Path Storage Facility.
- Power supply.
- Level of detail in relation to processing operations.
- Nature and composition of mine products

Lining of the Off Path Storage Facility

The Applicant notes that the Facility would be used to store overburden, interburden and limited volumes of reject material. Section 3.5.3 of the EIS, and Appendix 1 of the *Amendment Report* provides a justification of why the Environment Protection Authority's *Tailings Liner Policy* does not apply to the Project. The Environment Protection Authority in its submission to the EIS (see Section 4.8) did not raise lining of the Facility as a matter of concern.

Power and water supply

Section 3.3.3.2 of Appendix 1 of the *Amendment Report* states that the power for the construction phase of Project would be provided by silenced diesel-powered generators. Following completion of the proposed 66kV transmission line, grid power would be used. The power would be sourced from the 220kV Buronga to Broken Hill Transmission Line and the Applicant is currently negotiating with the operators of that line. Finally, the Applicant would secure the minimum 30% renewable energy target through commercial contracts with generators. Given the availability of renewable energy via the grid, a solar farm is no longer proposed.

In relation to water supply, the Applicant is advised that the proposed reverse osmosis plants would be suitable for the intended use.

Level of detail in relation to processing operations

Section 3.5.2 of Appendix 1 of the *Amendment Report* provides a description of the proposed processing operations, including Section 3.5.4 which describes the operation of the Rare Earth Concentrate Plant. The description is provided in sufficient detail to permit an assessment of the likely environmental and other impacts to be assessed.

Nature and composition of mine products

The Applicant has undertaken substantial drilling to understand the nature, mineralogy, size and grade of the ore body. Based on that information, a JORC-compliant resource has been estimated and is presented in the Applicant's website.¹

Information in relation to the material characterisation of the ore, heavy mineral concentrate and mine products has been derived from assay work undertaken on approximately 16t of bulk samples sourced from composite and homogenised samples from many hundreds of drill holes. These samples were used for detailed testing of the proposed processing methodologies. As a result, RZ Resources contend that the samples tested are representative of the ore.

The composition of the heavy mineral concentrate and mine products presented in Table 6.11.1 of the EIS was derived from samples generated from processing of the above bulk ore samples during the metallurgical test work. As a result, these samples are also considered to be representative of the heavy mineral concentrate and mine products that would be produced by the Project.

5.4.7 Proposed Operations - Rehabilitation and Final Land Use

Representative Comment(s)

The Copi Mine EIS states that the Land capability after rehabilitation will be better than the current Land Capability, this cannot be possible. The Mine will remove all trees and vegetation, then it will remove the top soil and store it, then the undersoil will be placed separate, then the parilla sands will be dredged up processed and the mixed up layers placed back in the pond, then about 20 cm of under soil put on top and then the top soil. Every movement or process will change integrity and structure of the horizons. To grow anything in this soil will be a miracle, in this rainfall it will be impossible without irrigation. The appendices has a piece Appendix 3 - 14 Rehabilitation Plan tech support, 2 Rehabilitation quote "Full restoration in the arid rangelands, even without the issue of highly modified soil structuresis difficult if not impossible."

...

The mine will remove trees totally from the mine sight, this includes a Mallee community, to say that regeneration will occur and be successful is drawing a long bow. The other sand mines within a 150 kilometre radius of the proposed mine sight haven't had huge success why would this group. First time miners with a great deal to learn may not make it past the start date let alone the long term rehabilitation. The directors and shareholders should be personally linked to the success of the rehabilitation success and pursued to ensure 100 percent success is achieved.

¹ <https://rzresources.com/operations/reserves-and-resources/>

The overseeing of the rehabilitation should be independent and consequential.

...

This is a very volatile area, we have a hyper saline groundwater with a topsoil/ under soil balance that is growing trees shrubs grass and endangered species in niche environments, the mine goes through and totally removes all and the has the ambitious task to rehabilitate the are better than previous land and soil capability as stated.

...

I have used 40 saltbush varieties to combat salt in this rainfall and I have years of experience in this area and I can confidently say that these writers need to be educated on real life. This will not occur and pre mine measures need to be independently taken and hold the executives to account on this issue as it is not achievable. The sections in the appendices even state this but it appears the EIS writers have used another view. I think the cot cases of mineral sand mines within 150 kilometres in this section would give a clearer picture.

Name Withheld, Rufus, New South Wales - Submission No. PO19

I am concerned about that rehabilitation of this project would never be completed. RZ is a new miner, they have not successfully delivered a mine or rehabilitated a mine before. There are more experienced miners who have been unable to successfully rehabilitate mines.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

I don't believe the rehabilitation of the site after the fact will be sufficient to restore the site back to the way it is now so resident lizards insects fauna and wildlife will return.

Adrian Hartley, Merbein West, Victoria - Submission No. PO36

The salt water in the mine and surrounding areas would remain a sludge basin that will not grow vegetation once destroyed. The EIS final form suggests that the land capability and production will be returned to similar capabilities to what it is now. To be rather polite this could be considered total rubbish as trees won't grow back in salt effected areas and perhaps thousands of trees will also die outside the mine area due to salt seepage as can be currently seen around southern area of Land Victoria where pressure of the water table has created a tree waste land.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Land capability of the final landform.
- Likelihood of success of rehabilitation operations.
- Salination of the final landform.

Land capability of the final landform

Section 6.4.7.2 of the *Amendment Report* identifies that the Project would result in a final landform with an approximate 561ha increase in the area of land classified as Soil Capability Class 6 compared with the pre-mining landform. A comparison of Figures 6.4.2 and 6.4.4 of the *Amendment Report* identifies that this is because the final landform would include a reduced area of the Eastern Salt Pan which has an agricultural land capability of Class 8. By contrast, the final landform would include an elevated landform which would be spread with soil and revegetated. The agricultural capability of this final landform is expected to be Class 6 land.

Likelihood of success of rehabilitation operations

The Applicant notes that rehabilitation trials would commence as soon as practicable following receipt of development consent, with multiple years of trials to be completed prior to the commencement of rehabilitation operation. In addition, rehabilitation would be undertaken progressively, and that success or failure of that rehabilitation would be able to be monitored, and if required addressed, during the life of the Project. In addition, the Applicant notes that rehabilitation of the Mine Site would be a matter that the Resources Regulator would have substantial interest in and that the Applicant would be required demonstrate progression towards pre-determined mine closure criteria progressively throughout the life of the Project. Finally, a rehabilitation security bond would need to be provided prior to mining operations commencing. That security would be available to complete rehabilitation in the event that the Applicant is unable to do so.

Salination of the final landform

Section 3.12.2 and Figure 3.12.1 of Appendix 1 of the *Amendment Report* describe the final landform which would comprise the following.

- A series of elevated native ecosystem areas that would covered with soil and revegetated. These areas would be well above the water table and vegetation would be unlikely to be impacted by highly saline groundwater.
- Low lying areas with elevations of approximately 26m AHD, similar to the surrounding salt pans. These areas would be managed to establish a salt crust similar to that that occurs on the surrounding salt pans, with vegetation expected to be limited in these areas.

As a result, the Applicant does not agree that highly saline groundwater would limit rehabilitation of the final landform.

Finally, the Applicant notes that the salination issue referred to in the vicinity of Lake Victoria is caused by processes unrelated to those that would occur within the Mine Site.

5.4.8 Groundwater - Users

Representative Comment(s)

Groundwater usage and the detriment

The Murray Basin Hydrogeological map-Anabranch, published by the Australian Geological Survey Organisation, Commonwealth of Australia 1993. This displays the groundwater flow of the aquifers under the Copi Mine, Lake Victoria and the Murray. The system is very fluid and is in no way confined as inferred by the EIS. The EIS states that depressions drain internally and that Blanchetown clay will be used to confine hyper saline dam contents. The Loxton-Parilla Sands are hyper saline and these are what will be pulled out of the ground, processed and dumped back into the mining pond, the horizons and salinity lenses will be totally mixed, adding to this will be the discards from the reverse osmosis plant, super salted water. The overall outcome cannot be assessed through modelling as few loose parameters could mean the end of Lake Victoria.

...

Radioactivity and water heading to Lake Victoria 25 kilometres away is a major concern.

Production bores, these will be put into the upper aquifers and cased and correctly installed. The reviewing body needs to ask the question and on ground truth the exploration bores. These went into the three aquifers as test results indicated. Were these cased plugged and filled in correctly in relation to the construction requirements for water bores in Australia.

Groundwater resources

The statement that groundwater will be drawn down is not possible, this is a constantly redeeming system, the aquifer flows to Lake Victoria, it will flow into the mine site and will flow away, the resultant will be constant. The flow rates at Lake Victoria didn't vary from the other mines, why would this be any different. The problems for the aquifers will be more due to the interference by the mine. The salinity and the tailings will be totally mixed then dumped back into the aquifer this is more a concern.

Name Withheld, Rufus, New South Wales - Submission No. PO19

The ability of the mining company to control and manage their impact on the water table is also a worrying factor for the security of our stock and domestic water as well as the possible impacts to SA irrigation that relies heavily on Lake Victoria for their controlled water supply as well as the larger environment that could be greatly damaged with a simple miscalculation or mistake.

Mathew Duncan, Pine Camp, New South Wales - Submission No. PO20

These water bodies provide drinking water for many people, they support Agricultural businesses in 3 different states. If there was an environmental disaster at the Copi project, the close vicinity to these water bodies is a significant risk. The water aquifers that the project will disturb are linked to Lake Victoria. Lake Victoria provides drinking water to South Australia.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Adverse groundwater-related impacts on Lake Victoria
- Adequacy of installation of bores into the Middle and Lower Aquifers
- Adverse impacts on stock and domestic water supply

Adverse groundwater-related impacts on Lake Victoria

The applicant acknowledges that adverse project-related impacts on or surrounding Lake Victoria is a matter that has been identified by multiple individuals it has consulted with.

Figure 1.4 of the EIS presents a section showing the stratigraphic units in the vicinity of the Mine Site and Lake Victoria. That image, sourced originally from the *Ana Branch Hydrogeological Map* published by the Australian Geological Survey Organisation in 1992, indicates that Lake Victoria is underlain by Blanchetown Clay, an aquitard that overlies the Loxton-Parilla Sands, host of the Upper Aquifer. It is this aquifer in which the mine will operate.

The Applicant notes that waters within Lake Victoria have a substantially lower salinity than water within the Upper Aquifer, suggesting separation of the Lake from the saline aquifer. As a result, Project-related impacts on the Upper Aquifer would be unlikely to impact on Lake Victoria.

Finally, the updated Groundwater Impact Assessment presented as Appendix 4 of the *Amendment Report* and summarised in Section 6.2 of that document identifies that Project-related impacts within the Upper Aquifer are predicted to be limited to the area immediately surrounding the Mine Site. The maximum zone of drawdown would be approximately 30km from Lake Victoria.

Adequacy of installation of bores into the Middle and Lower Aquifers

The Applicant notes that all bores installed for the purposes of the Project's groundwater assessment were installed within the Upper Aquifer only. The only bores within the Mine Site that intersect the Middle and Lower Aquifers are

- Bore GW036722 which was installed by the NSW Government in 1987.
- Bore GW009721 was installed by a previous owner of Warwick Station and has not been able to be located at surface.

Adverse impacts on stock and domestic water supply

Project-related groundwater impacts would be limited to the Upper Aquifer. The water within that aquifer is too saline for stock and domestic use. The Project would not impact on the Middle or Lower Aquifers which have water of lower salinity, potentially suitable for stock and domestic use. As a result, and as stated in Section 6.2.4 of the *Amendment Report*, the Project would not impact on surrounding stock and domestic groundwater users.

The Applicant however acknowledges the importance of the Middle and Lower Aquifers for stock and domestic water supply for landholders surrounding the Mine Site. As a result, the Applicant would consult with landholders surrounding the Mine Site in relation to monitoring of existing bores prior to the commencement of construction operations.

5.4.9 Groundwater - Contamination

Representative Comment(s)

Water contamination - there needs to be a peer reviewed study and analysis of the impacts of this mine on groundwater.

James Robertson, Renmark, South Australia - Submission No. PO18

I am concerned about the plans to pump highly saline water into ponds on top of the ground. The potential for harm from this action is significant. The mine plans to pump any seepage back into the pond. But they have not considered how they will control the movement of that salt water underground and into surrounding top soil. I fear what the impacts to the surrounding land and water bodies will be from this project. I witnessed RZ Resources pump highly saline water on top of the ground on our property. This resulted in many trees killed. Salt deposits remain on top of the ground where they did this.

...

Phillip Macumber's review of Hydrogeological Aspects of the Goschen project (March 2024) discusses the risk of contaminated mining waste being a source of potential contamination to surrounding ground and surface water. The Macumber report notes well established carcinogens from heavy mineral deposits associated with ilmenite. The report discusses the presence and ready availability of metallic elements and leachates that would enter the groundwater system in the Goschen project, this has to be similar to what will occur in the Copi project. The report

notes that groundwater flows from the Goschen mine area toward Lake Tyrell. I understand that groundwater in the Copi project area flows toward nearby Lake Victoria. I am concerned that these risks have not been properly considered in the Copi project.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

I would be affected by the contamination of heavy metals including radio-active particles that are mixed in the dredging actions of sludge mining where the ground water that is 120 000 ppm saline, four times saltier than the sea , is mixed and allowed to re-enter the underground water table and flow south as it naturally occurs to flow under Lake Victoria and the Murray River and its flood plains. These natural water flows are known to seep into Lake Victoria which is considered a major water supply in the Murray Darling Basin System which is a main reservoir to South Australia for irrigation and population water supply to the value of over 80 million dollars in water value annually.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Contamination of land by salt from groundwater
- Contamination of groundwater

Contamination of land by salt from groundwater

The Applicant contends that the land surface would not be contaminated by pumping of groundwater for the following reasons.

- Water would be pumped between the starter pond and the Water Storage Dam to manage water levels during construction operations. The location of that structure has been selected because it occurs within an area of Blanchetown Clay and as result, seepage from the structure would be limited. In order to facilitate rehabilitation, topsoil would be stripped prior to water being pumped to the Dam and, if required, low salinity overburden would be used during rehabilitation operations to ensure adequate separation between the saline substrate and final landform.
- The Off Path Storage Facility would be monitored to ensure that groundwater mounding under the facility does not result in unplanned discharge of groundwater to the natural surface. If monitoring indicates that this may occur, measures would be implemented to reduce mounding or to intercept the groundwater.
- Low salinity water would be used for dust suppression in areas outside the Extraction Area.

Contamination of groundwater

The Applicant contends that groundwater contamination would not occur for the following reasons.

- With the exception of limited quantities of flocculants, no chemicals or other additives would be used.

- The Project would not result in the generation of contaminated wastes with the potential to adversely impact groundwater quality.
- As described in Sections 6.9.6.6 and 6.12.5.3 of the *Amendment Report*, the emissions of heavy metal or radionuclides would be negligible and as a result, would not cause contamination of groundwater.

5.4.10 Groundwater - Interference

Representative Comment(s)

The proponent has not provided a Salt Balance report.

In each year of production, the mine will extract approximately five gigalitres of saline groundwater for the operation of the dredge and mine pit.

This groundwater is at a level in excess of twice the salinity of the ocean.

The extraction of groundwater then includes a component of up to million tons of salt on an annual basis.

Much of the saline groundwater is reported back to the mine pit as mine tailings are deposited and ultimately returned back to the groundwater system. However, dependent on operating circumstances and the weather and to achieve a balance at times, mine water and mine tailings will be stored or held in surface dams. This provides the opportunity that as mine water evaporates that a salt component can remain in storages and ultimately be transported by wind action or otherwise from the mine site.

Salt is a poison to farmland and a risk is created that ultimately through dust deposition and surface water flows that salt reports to Lake Victoria.

The consideration of salt balance could be evaluated by an examination of the nearby Ginkgo mineral sand mine which in many aspects, including the mining model, appears to mirror the proposal put forward by the Copi project.

Bendigo District Environment Council – Submission No. OO01

The project will disturb aquifers, vast quantities of highly saline water and soil will be moved.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Environmental figure ES 5 shows no understanding of the flow volume and direction yet RZ Resources are proposing to interfere with the water flows with little or no understanding to the consequences or damage to the salt and heavy contaminants that would leach back into the Murray Water System.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

The principal concerns raised by submitters related to the Project's salt balance and potential impacts to groundwater.

Section 3.8.4 and Table 3.8.3 of Appendix 1 of the *Amendment Report* presents a water balance for the Project. Water losses associated with the Project and anticipated to be up to 1,117ML per annum (MLpa) would include the following.

- Mine Camp and Nursery.....59MLpa
- Offices/Workshop.....55MLpa
- Dust suppression.....126MLpa
- Concentrate Moisture to Stockpile53MLpa
- Evaporation.....824MLpa

Table 5 presents a conceptual annual salt balance for the Project based on the following conservative assumptions.

- Water lost from the Mine Site has a salt concentration of zero.
- All salt associated with the water lost from the Mine Site is retained within the dredge pond with an assumed volume of 64GL.
- An initial salt concentration of 61,000mg/L.

Based on the conceptual salt balance, the concentration of salt within the dredge pond would increase from approximately 61,000mg/L to approximately 62,000mg/L over a one year period. The anticipated increase in salt concentration would not result in adverse environmental impacts for the following reasons.

- The water within the Upper Aquifer is already hypersaline.
- There are no known users of the water within the Upper Aquifer.

Table 5
Conceptual Salt Balance

Component	Amount	Units
Volume of Water lost	1,117	MLpa
Salt concentration	61,000	mg/L
Salt retained	68,137	t
Assumed volume of dredge pond	64,000	ML
Quantity of salt in dredge pond	3,904,000	t
Quantity of salt in retained water + retained salt	3,972,137	t
Concentration of salt in dredge pond	62,065	mg/L
Percentage change in salt concentration	2%	

5.4.11 Biodiversity – General

Representative Comment(s)

The flora/fauna study began in the last drought, observations and numbers were displayed yet the major component DROUGHT appears to be only noted in some pictures, this is the only data collected for the major component of the proposed mine as access to Huntingfield and Sunshine was revoked due to no written exploration agreement. The whole Flora Fauna study cannot be extrapolated to the whole proposed mine. The species recorded would need to be collected across the whole mine site especially due to the variance in system types, especially over the whole mine site.

The threatened species in the Lake Victoria EIS would have probably been a helper tool to the study developers but it doesn't seem to have been recognised. From my experience in this area I would suggest a lot more species exist, yet they do not seem to be noted. A prime example would be species like the inland Taipan (Fierce Snake), is present in this area and has quite a small overall species boundary. So to is the Bustard occasionally. Local knowledge would be essential, and really would have been beneficial to the study developers.

Name Withheld, Rufus, New South Wales - Submission No. PO19

I am concerned about the limited biodiversity studies conducted on our property. We live here and see a huge number of different plants and animals at different times of the year. The studies I have seen for the Copi project are limited and have not identified many animals that my family and I know live in our environment. We had a local bird watching group visit our farm and record 58 species in a few hours. This did not include the owls, bats and nightbirds that we see on our farm.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

Some of great significance such as the Pink Cockatoo major Mitchell which frequents often. I have seen groups of up to 20 plus at times. Not to mention thousands of other native bird species.

Adrian Hartley, Merbein West, Victoria - Submission No. PO36

Other Environmental Issues would be that native flora and fauna species are very easy to destroy and almost impossible to replace in a fragile 200mm rainfall climate.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

The Applicant notes that the Biodiversity Development Assessment Report (BDAR) presented in the EIS has been substantially updated considering feedback from BCS and the proposed amendment to the Project. The updated BDAR has been prepared by a certified assessor in accordance with the NSW Government Biodiversity Assessment Method and clause 6.15 of the *Biodiversity Conservation Act 2016*. The assessment was prepared in consultation with Conservation Programs, Heritage and Regulation (CPHR) Group (formerly BCS) and will be the subject of detailed review by that organisation.

The Applicant contends that the updated BDAR, presented as Appendix 5 of the *Amendment Report*, is a robust assessment that is fit for purpose and adequately quantifies biodiversity-related impacts associated with the amended Project.

5.4.12 Biodiversity – Threatened Species and Ecological Communities

Representative Comment(s)

The threatened species *Austrostipa Nulla Nulla* exists only within 20 kilometres of the mine site and including the mine site. We have salt lakes on our property which do not harbour *Austrostipa null nulla*, the species is very specific in its parameters of certain gypsum and saline content for soils. To remove a major area where it exists and put the other communities at risk being down stream in an aquifer sense from the mine would suggest a scary scenario.

The other sand mines in the area need to be looked at with regards to rehabilitation as the potential of the *Austrostipa nulla nulla* not succeeding is very high, this should put the mines footprint in jeopardy due to species total depletion potential. Regenerating this species on a rehabilitated soil strata will be impossible, especially when considering the rainfall and the finicky nature of the species in question.

Name Withheld, Rufus, New South Wales - Submission No. PO19

Representative Comment(s)

Page 6-49, Predicted Species Credit Species table 6.3.3: We note the Pink Cockatoo is not identified as endangered in the EIS.

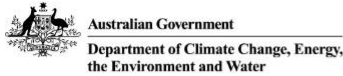
Copi Mineral Sands Project

Table 6.3.3
Predicted Species Credit Species

Page 1 of 2

Scientific Name	Common Name	Species for Further Assessment		Listing Status	
		Retained?	Reasons for Exclusion	BC Act	EPBC Act
Flora Species					
<i>Acacia acanthoclada</i>	Harrow Wattle	Yes	-	Endangered	-
<i>Acacia careronum</i>	Purple-wood Wattle	Yes	-	Vulnerable	Vulnerable
<i>Atriplex infrequens</i>	-	Yes	-	Vulnerable	Vulnerable
<i>Austrostipa metatoris</i>	-	Yes	-	Vulnerable	Vulnerable
<i>Austrostipa nullanulla</i>	Nulla Grass	Yes	-	Endangered	-
<i>Brachyscome papillosa</i>	Mossgiel Daisy	Yes	-	Vulnerable	Vulnerable
<i>Calotis moorei</i>	A burr daisy	Yes	-	Endangered	Endangered
<i>Cratystylis conocephala</i>	Bluebush Daisy	Yes	-	Endangered	-
<i>Dodonaea stenozyga</i>	Desert Hopbush	Yes	-	Critically Endangered	-
<i>Kippistia suaeifolia</i>	Fleshy Minuria	Yes	-	Endangered	-
<i>Lasiopetalum behrii</i>	Pink Velvet Bush	Yes	-	Critically Endangered	-
<i>Leporhynchus waitza</i>	Button Immortelle	Yes	-	Endangered	-
<i>Pimelea serpyllifolia</i>	Thyme Rice Flower	No	Subject land is more than 50km from Murray River	Endangered	-
<i>Pterostylis cobarensis</i>	Greenhood Orchid	Yes	-	Vulnerable	-
<i>Santalum murrayanum</i>	Bitter Quandong	Yes	-	Endangered	-
<i>Swainsona colutoides</i>	Bladder Senna	Yes	-	Endangered	-
<i>Swainsona pyrophila</i>	Yellow Swainson-pea	Yes	-	Vulnerable	-
<i>Swainsona sericea</i>	Silky Swainson-pea	Yes	-	Vulnerable	-
Fauna Species					
<i>Amytornis striatus</i>	Striated Grasswren	Yes	-	Critically Endangered	-
<i>Ardeotis australis</i>	Australian Bustard	No	Species is vagrant and habitat has been degraded by extensive grazing	Endangered	-
<i>Burhinus grallarius</i>	Bush Stone-curlew	Yes	-	Endangered	-
<i>Haliaeetus leucogaster</i>	White-bellied Sea-eagle	No	Species is vagrant and unlikely to breed in Biodiversity Assessment Area due to lack of regular food supply	Vulnerable	-
<i>Hamirostra melanosternum</i>	Black-breasted Buzzard	Yes	-	Vulnerable	-
<i>Hieraetus morphnoides</i>	Little Eagle	Yes	-	Vulnerable	-
<i>Lasiornis latifrons</i>	Southern Hairy-nosed Wombat	No	Habitat is considered degraded and continues to be degraded by feral herbivores including goats and rabbits	Endangered	-
<i>Lophochroa leadbeateri</i>	Pink Cockatoo	Yes	-	Vulnerable	-

Please see below extract from Department of Climate Change, Energy and the Environment and Water. Eastern Major Mitchell's Cockatoo is another name for Pink Cockatoo.



**Conservation Advice for
Lophochroa leadbeateri leadbeateri (eastern Major
Mitchell's cockatoo)**

**In effect under the *Environment Protection and Biodiversity Conservation Act 1999*
from 31 March 2023.**

This document combines the approved conservation advice and listing assessment for the subspecies. It provides a foundation for conservation actions and further planning.

Conservation status

Lophochroa leadbeateri leadbeateri was assessed by the Threatened Species Scientific Committee to be eligible for listing under criterion as Endangered under criterion 1. The Committee's assessment is at Attachment A. The Committee's assessment of the species' eligibility against each of the listing criteria is:

- Criterion 1: A2bce: Endangered

Page 6-57, Field Surveys Results: The table lists that there are no pink cockatoos present and no further assessment required. The table also lists that there are no bitter quandong's present and no further assessment required.

We know that both the Quandong and Pink Cockatoo are present on our farm (see above photos taken 23/01/2024). There have been very limited studies conducted on our property to identify at risk species. Some of the studies conducted were done in the middle of a severe drought.

Copi Mineral Sands Project

Table 6.3.7 (Cont'd)
Species Credit Species Field Survey Results

Page 2 of 2

Common Name	Scientific Name	Listing Status		Survey Method	Present?	Further Assessment Required?
		BC Act	EPBC Act			
Flora Species (Cont'd)						
Desert Hophbush	<i>Dodonaea stenozyga</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Fleshy Minuria	<i>Kippistia suaedifolia</i>	Endangered	-	Targeted threatened species survey	No	No
Pink Velvet Bush	<i>Lasiopetalum behrii</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Button Immortelle	<i>Leporhynchos waitza</i>	Endangered	-	Targeted threatened species survey	No	No
Cobar Greenhood Orchid ¹	<i>Pterostylis cobarensis</i>	Vulnerable	-	Assumed present	Assumed present	Yes
Bitter Quandong	<i>Santalum murrayanum</i>	Endangered	-	Targeted threatened species survey	No	No
Bladder Senna	<i>Swainsona colutooides</i>	Endangered	-	Targeted threatened species survey	No	No
Yellow Swainson-pea	<i>Swainsona pyrophila</i>	Vulnerable	-	Targeted threatened species survey	No	No
Silky Swainson-pea	<i>Swainsona sericea</i>	Vulnerable	-	Targeted threatened species survey	No	No
Fauna Species						
Striated Grasswren	<i>Amytornis striatus</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Bush Stone-curlew	<i>Burhinus grallarius</i>	Endangered	-	Targeted threatened species survey	No	No
Black-breasted Buzzard	<i>Hamirostra melanosternum</i>	Vulnerable	-	Targeted threatened species survey	No	No
Little Eagle	<i>Hieraetus morphnoides</i>	Vulnerable	-	Targeted threatened species survey	No	No
Pink Cockatoo	<i>Lophochroa leadbeateri</i>	Vulnerable	-	Targeted threatened species survey	No	No
Square-tailed Kite	<i>Lophoictinia isura</i>	Vulnerable	-	Targeted threatened species survey	No	No
Crowned Gecko	<i>Lucasium stenodactylum</i>	Vulnerable	-	Targeted threatened species survey	No	No
Black-eared Miner	<i>Manorina melanotis</i>	Critically Endangered	Endangered	Targeted threatened species survey	No	No
Red-lored Whistler	<i>Pachycephala rufogularis</i>	Critically Endangered	Vulnerable	Targeted threatened species survey	No	No
Desert Mouse	<i>Pseudomys desertor</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Note 1: The Applicant will undertake targeted survey for the Cobar Greenhood Orchid (<i>Pterostylis cobarensis</i>) during the assessment period for the Project and would amend or update the BDAR as required once complete.						
Source: EnviroKey (2024) – After Tables 31 and 32						



Photos of Quandong fruit and tree on our farm, photos taken 2023.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Response

In relation to specific matters raised above, the Applicant notes the following.

- *Austrostipa nullanulla*

Austrostipa nullanulla is identified within the updated BDAR as occurring within the Mine Site. The Applicant has, to the extent practicable, avoided habitat for the species, however 3.84ha of habitat suitable for the species would be removed. Table 6.3.11 of the *Amendment Report* identifies that 638 species credits would be required for the species. Section 6.3.6.5 of the *Amendment Report* provides an overview of the anticipated serious and irreversible impacts of the Project on *A. nullanulla*, taking into account the management and mitigation measures stated in Section 6.3.8 of the *Amendment Report*.

The Applicant has already commenced studies into the habitat and management of the species and would undertake further studies to determine the distribution of the species and measures required to maximise the potential for post-mining establishment of the species. The species would also be identified as a target species in the *Biodiversity Management Plan* and the *Rehabilitation Management Plan* required for the Project.

- Pink Cockatoo

Sections 6.3.5.2 and 6.3.7.2 of the *Amendment Report* identifies that Pink Cockatoo was observed within the Mine Site, but that no breeding habitat or breeding behaviours were observed.

- Bitter Quandong

Table 6.3.7 of the *Amendment Report* identifies that Bitter Quandong was not observed within the Mine Site despite extensive searches. In accordance with the BAM-C protocol, no further assessment is required for determining the presence of this species.

Notwithstanding the above, the Applicant acknowledges that this species may occur on the submitter's property.

5.4.13 Soils and Agriculture

Representative Comment(s)

Agricultural resources

The whole mine is fenced as stated for safety, the mine will ruin the soil integrity, the rehabilitated land will be inferior. The suggestion to make a nature reserve is a cop out and the soils will most likely be containing enough monazite to be dangerous to man and animals... This mine has the potential to create major human and stock problems if the radioactive piles and chromium/arsenic aren't zeroed. This will ruin many thousand of acres lives and stock.

...

The agricultural resources estimated in this area of the mine is vastly under exaggerated , to produce \$50414 per annum... One would give a real estimate that 16000ha would have annual lost income of over \$300000 .

Name Withheld, Rufus, New South Wales - Submission No. PO19

EIS page 6-212- last paragraph: 'In light of the above, there would be positive impact on agriculture as a result of the Project.

The above statement is highly speculative, overly optimistic, and in contrast to many other statements in the EIS. This is a laughable statement. The EIS states that the rehabilitated mine would not be suitable for grazing, which would include other agricultural pursuits.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

Highly saline water will be pumped onto the ground to dry out, and acid soils will be stored above ground.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Agricultural productivity.
- Salination and acidification of land.

Agricultural productivity

Section 6.11.5 and Appendix 7 of the *Amendment Report* present an updated agricultural assessment of the Project. In summary, the updated assessment concluded that the annual gross margin of Class 6 agricultural land within the Mine Site would be approximately \$12.21/ha. Allowing for a total of 2,508ha of Class 6 land to be disturbed by the Project, the annual gross margin for that land is estimated to be \$30,622pa.

Salination and acidification of land

The Applicant notes that the only use for highly saline water at surface would be:

- for dust suppression within the Extraction Area; and
- to create a salt crust over sections of the final landform that would be returned to salt pan.

There are no other activities that require the pumping of saline water to the ground surface of the Mine Site or surrounds.

Section 3.4.2 of Appendix 1 of the *Amendment Report* identifies that interburden immediately above the ore lenses may contain material that may be classified as potentially acid forming – low capacity. That material would be immediately placed back into the dredge pond below the water table and would therefore not pose a risk of generating an acidic leachate. No potentially acid forming material would be stored above ground.

5.4.14 Aboriginal Heritage

Representative Comment(s)

The aboriginal cultural heritage registered parties need to be all contacted by the government department responsible for reviewing this section. I asked the Barkindgi elders committee for Lake Victoria what involvement they had with the Copi mine project and they stated that they hadn't been contacted. The question of who was actually involved or consulted should be asked. This may need to also go to OEH.

Name Withheld, Rufus, New South Wales - Submission No. PO19

Heritage NSW should be engaged to do a comprehensive study on Aboriginal Heritage in this proposed area as it was the last area of the Harry Nanya Tribe before being shifted out of this area.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

Section 6.5.3.3 of the EIS details the consultation undertaken with the Aboriginal community throughout the Aboriginal cultural heritage assessment process. Section 6.5.3 of the *Amendment Report* details consultation undertaken with the Aboriginal community since the submission of the EIS. In summary, consultation was undertaken in accordance with *Aboriginal Cultural Heritage Consultation Requirements for Proponents* and has been ongoing since 2018. Additional parties were added to the list of Registered Aboriginal Parties (RAPs) as necessary and all RAPs were updated on a 6-monthly basis, or when a draft copy of the Aboriginal Cultural Heritage Assessment Report (ACHAR) available.

Section 6.5.1 of the EIS and Section 2.1 of the *Aboriginal Cultural Heritage Assessment Report* (ACHAR) (Appendix 8 of the EIS) state that the ACHAR was prepared in accordance with the:

- *Code of Practice for the Investigation of Aboriginal Objects in New South Wales; and*
- *Guide to Investigating, Assessing and Reporting on Aboriginal Cultural Heritage in New South Wales.*

Section 5.1 of the ACHAR considers the ethno-historical significance of Harry Nunya and the Barkindji tribe within the context of the region.

Finally, the ACHAR has been reviewed by and comments were received from Heritage NSW (See Section 4.5) Heritage NSW agrees with the proposed management measures and recommendations provided in the EIS.

5.4.15 Traffic and Transportation

Representative Comment(s)

The increased traffic, dust, noise and light pollution in the area will impact on the natural beauty and the native animals.

Clara Beckton, Leschenault, Western Australia - Submission No. PO14

Road network - due to heavy vehicle traffic, the local dirt road network would require major upgrades, given the concern over RZ Resources funding, it is likely that the local road network would suffer rather benefit from the presence of this mine .

James Robertson, Renmark, South Australia - Submission No. PO18

Nulla road closure

This is a projected aspect of the mine as the only part signed off is that of Warwick therefore the road and beyond has not been ethically acquired nor negotiated .

...

Traffic and transport

There has to be a major contribution factor from this mine toward the road as it destruction will be directly linked to the loads. The social costing of having these big non passable machines going up and down the road is also a necessary costing. This isn't Wentworth or Broken Hill council, it is the people/community that need to be consulted.

The haul road that will be constructed from the mine to the Silver City Highway will be a compacted dirt road. The surface will be constantly wet for dust suppression, this water will come from a hyper saline aquifer.

Name Withheld, Rufus, New South Wales - Submission No. PO19

Representative Comment(s)

Closer of the Nulla road will also affect the distance that our children will have to travel to receive their education. They currently travel to Broken Hill several times a term for face to face learning and closer of the road will mean a longer and more costly trip for our family .

Matthew Duncan, Pine Camp, New South Wales - Submission No. PO19

RZ Resources has not discussed the closure of Nulla Road with us, or sought our feedback, and we own the farm where the closure is planned. We use this road daily in the running of our farm.

...

The mine only proposes to control mine vehicles. Many workers and contractors will travel to site (camp) in their own vehicles, and will travel on whatever route they please. This will increase traffic on surrounding roads, increasing road damage, accidents, death of livestock where roads pass through paddocks, livestock theft, road rubbish and risk of biosecurity breaches. The condition of local roads will deteriorate. These are the roads we use to travel to town and run our business. We depend on these roads. RZ should commit to the maintenance of the public roads that their project will impact, not just the haul road.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Are the roads up to standards for this amount of mine trucks and is it safe to cart the mine materials through populated towns.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Road-traffic related impacts (noise, dust, lighting)
- Nulla Road Closure
- Traffic levels on the Silver City Highway
- Traffic levels on local unsealed roads
- Maintenance and condition of unsealed local roads

Road-traffic related impacts (noise, dust, lighting)

Sections 6.8.5.2 and 6.9.6.7 of the *Amendment Report* assess noise and dust-related impacts associated with use of the public road network, with such impacts determined to be substantially less than the relevant assessment criteria.

Lighting-related impacts associated with use of the public road network would be no different to that associated with existing night-time users of the road network. The Applicant has consulted with landholders along the route of the Site Access Road and upgraded section of Anabranch Mail Road and no issues related to night-time visual impacts have been raised.

Nulla Road Closure

Nulla Road is no longer proposed to be closed or realigned. As such, there would be no access-related impacts on the users of Nulla Road as a result of the Amended Project.

Traffic levels on the Silver City Highway

Section 6.6.4 of the *Amendment Report* identifies that traffic generated by the Project would not significantly affect the operating capacity of the existing public road network. The Applicant notes that the Silver City Highway includes ample overtaking opportunities for vehicles wishing to pass slower vehicles, including Project-related vehicles.

In order to manage and mitigate potential impacts on the amenity of the existing environment and native animals surrounding the Mine Site, a *Transport Management Plan*, prepared in consultation with Wentworth and Broken Hill Councils and Transport for NSW, will be implemented and include a Driver's Code of Conduct that outlines the Applicant's expectation in relation to driver behaviour, including driving in a courteous manner, adherence to all relevant road rules, minimising road traffic noise in built-up areas and ensuring that all Project-related vehicles remain on the approved transportation routes.

Traffic levels on local unsealed roads

Section 3.6.2.1 of Appendix 1 of the *Amendment Report* identifies the proposed transportation routes for the Project. Use of other local roads, including Anabranch Mail Road south of the Site Access Road or Renmark Road west of the Silver City Highway would be actively discouraged and would be for local traffic or residents only

Maintenance and condition of unsealed local roads

The Applicant has agreed to the terms of a draft Planning Agreement with Wentworth Shire Council in relation to management of unsealed local roads. In summary, the Applicant would:

- upgrade and maintain the section of Anabranh Mail Road between the Site Access Road and Silver City Highway; and
- provide a contribution to the maintenance of surrounding roads, including Anabranh Mail Road south of the Site Access Road, Nulla Road and Pine Camp Road.

5.4.16 Surface Water - Users

Representative Comment(s)

I am personally very worried about our main dam on my property. We have had meetings with representatives from the mine and discussed the importance of this dam. If any of the risks discussed were to play out it would be disastrous for this area... The native flora and fauna would also suffer greatly as they rely on this dam just as much as our livestock.

Greg Pollard, Rufus, New South Wales - Submission No. PO03

ES page 17 states that one farm dam within the boundary of Huntingfield Station will be relocated. It is not possible to move a ground dam as they are located in the most appropriate drainage area to gain natural rainfall flows.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Our property will be alongside the mine and we have voiced our concerns regarding our water supply. The Dam on the property has proven over time to be a very reliable water supply for us and our stock, not to mention in times of drought being the only water supply for native wildlife kilometres around. We have no other access to water and if this was polluted or damaged in any shape or form it would create huge problems for the Native Wildlife, our stock and also our family business. Monitoring our water source regularly is one thing, but what are they going to do if these risks/worries occur? There is no simple solution if our water supply is damaged and they have not provided us with any type of security to protect our property if these risks were to play out.

Lee Pollard, Rufus, New South Wales - Submission No. PO33

Response

The principal concerns raised by submitters related to adverse impacts to existing farm dams.

The Applicant acknowledges those concerns, particularly in an environment where groundwater resources within the Middle and Lower Aquifers are of marginal quality and difficult to access and rainfall can be infrequent. The Applicant is also aware of the significance of farm dams located on Blanchetown Clay as the catchments for those dams will typically have a higher runoff coefficient and the dams will have a superior holding capacity compared to dams located in sandier areas.

Section 6.1.2.2 of the EIS notes that surface water catchments within and surrounding the Mine Site are typically internally draining and indistinct and discontinuous drainage networks.

Section 6.7.4 of the *Amendment Report* identified that the Project would not impact on farm dams or their catchments within or surrounding the Mine Site.

Finally, the Applicant has discussed the importance of existing dams with the owners of surrounding properties and would ensure that arrangements are in place to monitor those dams and ensure that the quantity and quality of that water is not adversely impacted by the Project.

5.4.17 Surface Water - Contamination

Representative Comment(s)

Heavy mineral product could very well be deposited on to my land in weather events via wind and rain... Verbally the representatives have said they will provide a commitment to monitor water quality within the dam but I have not seen any type of security or contract given that would see them protect my dam and surrounding environment for the foreseeable future.

Greg Pollard Submission No. PO03

Potential for Adelaide water supply sourced from the Murray to be contaminated.

Greg Pollard Submission No. PO17

I am also concerned that this project will detrimentally impact my family's health with the potential for harmful waste products being so close to their house impacting on water and air quality.

Cara Beckton Submission No. PO14

We are completely dependent on rainwater for our drinking water at our Huntingfield house (R1). We also collect rainwater off various sheds and the Sunshine house (R5). This does not appear to have been considered in the Copi EIS. Our stock drink rainwater captured in our dams, they would also be exposed to any toxins/pollutants that the project would produce. Our dams provide drinking water for many native animals as well, some threatened and endangered.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

Response

The principal concerns raised by submitters related to adverse impacts associated with the deposition of contaminated dust with elevated heavy metals or other pollutants with potential associated water quality impacts.

Section 6.9.6.6 of the *Amendment Report* and Sections 6.1.5 and 6.2.5 of the updated Air Quality Assessment presented as Appendix 12 of that report identify that the rate of deposition of heavy metals on land surrounding the Mine Site would be less than 1.1% of the most stringent criterion for the metals assessed.

Similarly, Section 6.12.5.2 of the *Amendment Report* identifies that risks associated with radionuclides seeping into groundwater or surface water would be negligible.

5.4.18 Noise

Representative Comment(s)

The mine will at first be operating using diesel generators, there will have to be a great number to supply the quantity of mining infrastructure put forward. In summer our 40 degree days would see cooling panels opened and noise greatly increase... Even the 24 hour mining operation would make Huntingfield unbearable with noise.

Name Withheld, Rufus, New South Wales - Submission No. PO19

I would like to note that my family strongly objects to the out of hours construction. We will be living 1.3km from the mine, works will continue 24 hours a day, 7 days a week for at least 17 years. I am very concerned about the effects the noise and vibrations from this project will have on my family and our health.

...

I beg to differ that the project noise and vibrations will be so low risk and insignificant for our family. We live in a remote area, we have a very low level of background noise currently. The conclusions for this Noise Impact Assessment are comically optimistic, there is no common sense here. Do you have a social license if you plan a mine 1.3km from a family's home, you plan to operate 24/7, and don't offer any mitigation for the noise you will produce?

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

The diesel plant has been assessed with an output of 117 dB from a combined 15 generating sets each of 2 GW. This plant has been described as silenced or insulated. Typically, this is considered as providing 18 or 20 dB of attenuation. It is unlikely that this level of an attenuation could be achieved without importing high-quality German manufactured plant. In fact, on many days in far Western New South Wales the doors and vents of any acoustic containers will be left open to allow the plant to remain at a safe operating temperature and the acoustic attenuation will be minimal.

The generating plant is then likely to produce a relatively low frequency noise output and at a level above 140 dB, and in the quiet environment of a remote landscape with minimal masking noise this level of noise could, depending on weather conditions, become intolerable for many surrounding residents if they were to attempt to open doors or windows to ventilate their homes to reduce indoor temperatures on hot evenings.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Noise emissions associated with diesel generators.
- Noise levels at Residence R1

Noise emissions associated with diesel generators

Modelled sound power levels associated with diesel generators are identified in Table 16 of the Noise Impact Assessment (see Appendix 11 of the *Amendment Report*). In summary, the diesel generators were modelled with a sound power level of 117dBA. The notes to that table identify that that sound power levels was developed assuming 15 x 2,500kva silenced BS Power generators at 102dBA Lw each.

The Applicant would not remove noise control devices from the generators. As a result, the Applicant contends that modelled noise emissions associated with construction operations would be generally consistent with those described in the EIS.

Noise levels at Residence R1

The Applicant acknowledges that the Mine Site is located in a remote area and that existing noise levels are very low, with dominant existing noises associated with:

- traffic on local roads;
- domestic and rural noise from agricultural equipment, pumps, dogs, etc.;
- rural fauna noises such as stock, birds and insects; and
- wind generated noises such as wind in trees.

Section 6.8.5.1 of the *Amendment Report* identifies that noise levels at Residence R1 would be less than 30dBA during construction operations, or at least 5dBA less than the lowest relevant construction noise criteria.

Section 6.8.5.3 of the *Amendment Report* identifies that noise levels at Residence R1 would be less than the relevant Noise Policy for Industry criteria during the Project's operation phase.

The Applicant acknowledges that given the very low existing noise levels at Residence R1, that while compliant with the relevant criteria, Project-related noise will be audible at Residence R1.

The Applicant and the owners of Residence R1 are currently in dispute and formal mediation and arbitration to resolve disputes between the parties is currently in progress. The Applicant anticipates that any negotiated or arbitration agreement would take into consideration noise related impacts, including potential mitigation measures at the Residence.

5.4.19 Air Quality - Dust

Representative Comment(s)

Air Quality: When reviewing the Air Quality of our home environment, the Copi project has used data from 2019 as a baseline. 2019 was one of the most severe droughts on record in our area. Using this data as a baseline is seriously flawed. The air quality at times in 2019 meant we had to shelter inside because of poor visibility from many severe dust storms. The 2019 data does not represent the usual air quality for our home area. The 2019 data is outlier data, but is being used as a baseline data.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

RZ has one of their dust monitors situated less than 100 meters from their main entry point to Warwick Station. Every vehicle that enters and exits the property creates a cloud of dust that then settles in the dust monitor. This is flawed and unreliable data.

If the background level of dust is already in exceedance of the relevant criteria, any worsening of this level is not acceptable. We don't think this is acceptable or low risk, we worry about the cumulative health risk from any increases, and our exposure to this increase over 17 or more years. The impact to our stock is unknown, some of our paddocks will be right beside the mine pit, how will this affect our stock?

...

Significant wind and consequent dust storms are common in this area. The lack of detail on the specific control measures is very concerning to us.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

The assessment of dust generation by the proponent's consultant is not credible.

The consultant correctly describes that the larger component of dust generation is by wheel traffic on the haul roads. The consultant then describes that dust can be reduced to 10% of the dust that would have otherwise been generated by the application of polymer as a surface treatment and the application of water as a dust suppressant.

The application of polymer over the large surface areas of the haul roads on a mine site would be cost prohibitive. Similarly, the application of potable water would be cost prohibitive if that water was to be sourced from a reverse osmosis plant. In actuality, a likely minimal suppression of dust will only be achieved by the application of minimum amounts of saline mine water.

The dust generated from haul roads contains a component of amenity dust (PM10) and a component of high-risk silica dust (PM10).

The component of silica dust will cause an elevated risk of harm to human health at residences adjacent to the mine site.

The component of silica dust at each residence is required to be considered along with the accumulation of background dust and the other contributions which cause harm to human health such as the intake of heavy metals, to determine the overall increased risk to human health at each residence and reported in the human health risk assessment.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the quality of the air quality assessment.

The Applicant notes that the updated *Air Quality Impact Assessment (AQIA)*, presented as Appendix 12 of the *Amendment Report*, was undertaken by a recognised expert in air quality assessments, namely Northstar Air Quality Pty Ltd (Northstar). The assessment was conducted in accordance with the requirements of the *Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW*. The Environment Protection Authority has reviewed the AQIA and response made in relation to that review are provided in Section 4.8.

In relation to specific matters raised above, the Applicant notes the following.

- Use of 2019 as the representative year for the assessment.
As stated in Section 4.2 of the updated AQIA, 2019 was selected following an examination of meteorology data from the Mildura Airport automatic weather station from 2017 to 2021 as being most representative of the five-year period examined.
- Background data used for the AQIA.
Section 4.3 of the updated AQIA identify that background dust data, with the exception of deposited dust, used for the AQIA were sourced from the Environment Protection Authority-operated Wagga Wagga North air quality monitoring station. Deposited dust data from the Mine Site and surrounds was used for the updated AQIA.

- Dust impacts generally

Section 6.9.6 of the *Amendment Report* states that incremental (Project-alone) dust-related impacts at surrounding residences, including Residence R1, are expected to be small. Cumulative exceedances of 24-hour suspended particulate criteria are only expected to occur on days when the background concentrations already exceed or are close to exceeding the relevant criteria. On those days, incremental contributions are expected to make up only a small fraction of total dust concentrations.

- Silica-related risks

Section 6.9.6.5 of the *Amendment Report* states that annual average PM_{2.5} concentrations at all non-Project related receptors are predicted to be $\leq 0.6 \mu\text{g}/\text{m}^3$ during all scenarios assessed, significantly below the relevant criterion value of $3 \mu\text{g}/\text{m}^3$. Therefore, respirable crystalline silica is not considered to be a significant issue to human health as a result of the Project.

- Dust Suppression

Section 6.9.3 of the *Amendment Report* of the AQIA identify that the control of dust from the haul roads will be achieved through a multi-faced approach including the use chemical suppressants (e.g. Dustloc(C) or equivalent). The efficacy of such suppressants is well understood and the cost of their use has been factored into the Project's operational costs.

5.4.20 Air Quality - Health and Environment

Representative Comment(s)

Some majorly endangered animals that live on our farm will be greatly affected by the radioactive/toxic materials in the air... This mine is not a good idea because if there is toxic materials in the air around so close to where we live it will impact our lives, our pet's lives, our stock's lives and the environment.

Name Withheld, Pine Camp, New South Wales - Submission No. PO05

...concentrated monazite and other materials like chromium and arsenic which are prevalent in Loxton/Parilla sands have to be present in the air. The monazite is a medium sand consistency therefore will become airborne. People and livestock will be at risk over a huge area.

Name Withheld, Rufus, New South Wales - Submission No. PO19

With the possibility of air born contamination from the mining activities to affect the health of our family and the ability of us and future generation to farm and make a living off the land due to the factor of radiation and heavy metal contamination .

Matthew Duncan, Pine Camp, New South Wales - Submission No. PO20

Last point is Bio Security contaminants, Livestock feed on water and grasses that may be contaminated by heavy metals and radioactive dust. A very real risk to Australian overseas food markets if found in meat.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

The negative consequences of the mining company to farmers and their children include respiratory complications such as pneumoconiosis, asbestosis, and silicosis caused by inhaling fine particles from the large amounts of dust generated by mining activities like blasting and drilling.

...

Bioaccumulation in the plants (animals' food source) they eat can cause poisoning in native animals, sheep, goats, cattle and horses that are exposed to potentially toxic concentrations of mining particles in grasses and plants.

Michelle Vagg, Mildura, Victoria - Submission No. PO35

There is not a report on the accumulated human health risk which would be presented by the proposal, which in part would rely on a suitable Radiation Assessment and a credible Air Quality report.

...

The erosion of HMC by wind creates a number of human health risks. First, HMC dust (which proponent consultants commonly avoid modelling) pollutes rainwater tanks at residences with heavy metals which form a component of the HMC. The HMC dust needs to be further incorporated in the human health assessment as it is both inhaled, ingested in locally produced food products such as meat, eggs or vegetables, or absorbed by dermal contact.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Potentially hazardous particulates
- Mitigation of Air Quality Impacts

Potentially hazardous particulates

The Applicant notes that the geological setting of the Project, namely a sedimentary deposit comprising gravels, sands, silts and clays, is not suitable for naturally occurring asbestos. As a result, exposure to asbestos fibres and therefore asbestosis is not likely to result from Project related activities.

Risks associated with heavy metals in dust emissions and silica are addressed in Section 5.4.19 of this document.

Risks associated with radiation in dust emissions are addressed in Section 5.4.2.2 of this document.

5.4.21 Air Quality - Greenhouse Gases

Representative Comment(s)

The public are constantly being bombarded with climate change and emission targets, granting any company a mining licence in this area to mine supposed critical minerals is not going to help in any way to achieving these goals. Not only will this project require the greater use of fossil fuels but poses and even greater risk to the environment by the use of a radioactive process.

Name Withheld, Meadow Spring, Western Australia- Submission No. PO34

The Air Quality document reports an annual carbon dioxide production of just less than 40,000 tonnes. This figure does not include the accumulated figure for the road and rail transport of product to port, the shipping of product to ports in China or elsewhere and the interstate transport of FIFO workers etc.

...

If this project was to be operating in 2035, it is difficult to conceive that it could be economically substantiable while satisfying the carbon offsets that would be required by the Commonwealth Climate Change Act at that time along with various State Energy Plans.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Australia's greenhouse gas emissions targets
- Whether Scope 2 emissions have been considered.

Australia's greenhouse gas emissions targets

As described in Section 1.5.4 of the EIS, the Project will produce heavy minerals and rare earth elements, which are necessary components for a wide range of applications which will contribute to meeting State and National greenhouse gas emissions targets. These include rare earth magnets used in wind turbines, and electric motors for the next generation of road vehicles.

Since exhibition of the EIS, the Applicant voluntarily elected to undertake a Greenhouse Gas Assessment in accordance with the *NSW Guide for Large Emitters* published by the NSW EPA in January 2025. That assessment is presented as Appendix 13 of the *Amendment Report* and is summarised as Section 6.10 of that document.

That assessment determined that the Project would contribute greenhouse gas emissions commensurate with other similar projects and would establish emissions goals that would ensure that the Project emissions trajectory matches the NSW Net Zero targets and goals.

Whether emissions associated with transportation ex-Broken Hill have been considered

Greenhouse gas associated with transportation of mine products ex Broken Hill are classified as Scope 3 emissions and are not required to be assessed under the *NSW Guide for Large Emitters*.

5.4.22 Hazards - Radiation

Representative Comment(s)

But a radiation health expert who has viewed the documents said it lacked important details about radiation risk. Tilman Ruff says the statement lacks detail about radiation.(ABC News) University of Melbourne school of global health honorary fellow Tilman Ruff labelled the documents RZ had submitted "extraordinarily deficient".

Name Withheld, Pine Camp, New South Wales - Submission No. PO13

It states that Monazite will be produced at a rate of 7500t per annum, it is a radioactive material. Therefore the question needs to be addressed as to open air stockpiling prior to containerisation. The reason for sealing is the radioactive aspect associated with this material. It contains Thorium, uranium and to top things off chromium and arsenic to name a few. This material would have to be dried to a point for viable transport weights, therefore one assumes stockpiles would result. The health risk to mine workers on site as well as all people in the surrounding drift path would be immense. Considering the millennium drought, dust made it to New Zealand. Livestock throughout the region also would be consuming the same materials this could result in meat being condemned and total loss of income for livestock in the drift path. Lake Victoria is only 25 kilometres to the South, the Murray a little further .

...

Radiation seems to have been breezed over in 3.4.2.3 (P 3-28), it doesn't mention the mining of material to get 1% ore (Heavy Mineral Concentrate) then extracting Monazite at 7500 tonnes per annum. To be placed in drums due to radiation and breathing risk. This section needs a lot of clarification as it gives a very unclear true image of the mine .

...

Heavy mineral storage

HMC concentrate has been dewatered and trucked to the washing circuit on page 3-48, I take a storage dump exists for this to be dried, this also poses the question what are the protocols as this is 1% of total sands, would this not be radioactive and contain chromium and arsenic due to concentration.

The concentrate upgrade circuit states it would be dried, once again in stock piles? Or how, dry concentrate means drift potential and we are getting toward concentrated monazite.

How is the monazite dried as once again tonnage would indicate it would need exposure to dry also the mentioning of bulka bags is mentioned this does not slow radiation nor the potential particulate issue. The process doesn't seem to be clear and would need a detailed process to assess public and animal health exposure issues.

Mineral sands from the Loxton / Parilla sands contain heavy metals ,where in these processes are they made aware and precautionsed against. Chromium and arsenic are lethal.

...

Hazards and public Safety

The rare earth concentrate plant will produce class 7 radioactive material, even the Heavy Mineral Concentrate is dangerous to workers as it has radioactive material and heavy metals within. The transporting sounds safe till something goes wrong, the potential is high in Broken Hill and many towns along the railway and then finally in BRISBANE and the Brisbane river all sound very dangerous. The one that concerns me greatest is the prior to going into drums or containers. The 7500 tonnes has to be put somewhere, it would have to be dried, therefore it will become airborne. Very dangerous to mine staff and landholders and livestock absorbance. This needs major scrutiny and because it goes across two states possibly federal scrutiny.

The tonnage of material to come out of this mine would suggest HMC will have to be stockpiled somewhere, this is radioactive. Thorium and Uranium at 1part in 10000 this would mean a pile 70 metres high by possibly a kilometre long. Open to the elements and dust particulates blowing.

...

The other question is why would the Queensland Government allow a processing plant at Pinkenba Mineral separation plant for such dangerous materials that close to Brisbane. This would be a major component to the sovereignty argument as without this approval it would also go direct to China .

Name Withheld, Rufus, New South Wales - Submission No. PO19

Representative Comment(s)

I have concerns about living 1.3km from a mine pit. The noise, dust, light, and radiation will be present in our lives daily for 10-17 years. This WILL have negative consequences on my family. RZ Resources has not made plans to mitigate these risks to our health from their mine, any mitigation plans have not been communicated to us.

...

There is no detail in this plan. The plan would be updated once the rare earth concentration plant was commissioned. This is 'putting the cart before the horse'. How can there be so little detail about the rare earth concentration plant and the radioactive material it will process?

...

There is no information on how these numbers were produced. How were these figures determined? How many samples were tested? How can this information be peer-reviewed with the lack of data provided? Where is the radiation report? The detail on the handling of the radioactive material is so vague and limited that one cannot be sure what the project plans to do with this product.

...

There is no mention of monitoring baseline radiation levels at our family home located 1.3km from the dredge/mine pit. I am extremely concerned about the radiation risks to our family and the greater community. I am concerned about the radiation risk to our livestock and the native animals that inhabit the area. This risks our ability to provide healthy, uncontaminated livestock to the domestic and international markets.

...

I read Dr Harry Watts' Expert Witness Statement on Radiation for the Goschen Mineral Sands project (March 2024). Dr Watts notes on Page 8 (para 3 and 4): 'It should be emphasised, however, that the rare earth mineral concentrate is a fine material that may produce a lot of dust. Engineering controls for total containment are necessary. In addition to storage of radioactive materials on site, there will be movement of radioactive materials throughout the plant from the flotation cells to the sulphation baking kiln to the leaching and precipitation units, to the mixing units. It is necessary to encapsulate or isolate the materials in these processes from the environment'. The lack of consideration and mention of these factors in the Copi EIS terrifies me. These processes will be occurring in close proximity to my family home, and there is no detailed plan.

...

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

We object to this project based on the risk to our health. Radioactive materials will be produced and concentrated. Yet there is no Radiation report in the EIS.

...

There is limited detail about the handling of the radioactive material between being removed from the ground and ending up in containers. Who will handle this radioactive material and how will it be handled?

...

The lack of detail related to the hazardous radioactive materials, heavy metals, and contaminants this mine will generate is concerning.

...

RZ Resources has not disclosed that they will be handling/processing radioactive materials to us as neighbours/affected parties. It is only through reading this EIS we started to understand the risks to our family by being so close to the proposed mine and its radioactive activities.

...

Is any radiation risk acceptable? Let alone a moderate magnitude risk? The EIS states that our house, including our drinking water (rain water) will be located just 1.3km from the mine pit. The EIS suggests 'some measures' to reduce risk of radioactive effects, are these proven? What level of risk should our family accept living beside the mine site? Should we accept the moderate risk to our health so RZ, with a poor compliance record, can make a profit from their project? Can we trust that RZ will enforce these risk reduction measures? RZ has poor compliance with legislation. RZ has repeatedly made the same mistakes. The risk to our health if RZ makes mistakes, or cuts corners with radioactive material are unacceptable.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

It also should be considered that possible radioactive contamination of the local residents and the population on future here the mining material is being sent to and processed.

...

Is it even feasible to supply power and fresh water and a mine village in an area possible under radioactive material

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Unless there is an oversight by the BDEC, the Copi documents do not appear to contain a report as a Radiation Assessment, rather than the document provided by the proponent offering an explanation why they consider that the HMC should not be classified as radioactive.

...

1. Radiation Assessment

The Radiation Assessment does not provide detailed information on the handling and storage of the radioactive materials, in particular the HMC and the REC.

The assessment should include actual calculations which describe the circumstances of workers as they handle and approach the stockpiles as well as other locations, for instance in the areas of the processing plant where HMC or REC might not be contained in vessels or plumbing.

The physical stockpiles of HMC create considerable risks as the proponent may find it necessary to stockpile some thousands or tens of thousands of tons of HMC on site waiting logistics such as shipping or waiting for a turnaround in market conditions circumstances to create a sale.

HMC stockpiles are a necessity at a mineral sand mine as using the natural weather conditions is the only effective way to drain and subsequently dry HMC to the circumstance where it is ready for transport. During adverse weather conditions HMC stockpiles, which can be 15m or more in height can be a subject to dramatic wind. (See images at the end of this document)

...

The ABC has published an article in which a professor from Melbourne University, an expert in radiation risk, has described the documentation provided by RZ Resources in the area of radiation assessment as “extraordinarily inadequate”. (The article is included at the end of this document)

Bendigo District Environment Council – Submission No. OO01

Response

Following exhibition of the EIS, the Applicant engaged DBH Radiation Pty Ltd to prepare two assessments, namely a *Public Radiation Risk Assessment* (DBH, 2025a) and an *Assessment of Environmental Radiation Impacts (Non-Human Biota)* (DBH, 2025b). Those assessments are presented as Appendix 14 of the *Amendment Report* and are summarised in Section 6.12 of that document.

The *Public Radiation Risk Assessment* calculated potential radiation doses using internationally recognised methodologies, relying on conservative assumptions, including the following.

- Maximum radionuclide content of the project materials.
- Conservative dust emission and composition assumptions.

The assessment considered radiation-related doses to a Critical Group of individuals most likely to be impacted from the Project, namely a theoretical adult male and a 5-year-old child living at Residence R1. For the purposes of the assessment, those individuals were assumed to reside at the residence 24-hours per day, 365 days per year.

The dose limit established by the Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) for a member of the public is 1 millisieverts (mSv) or 1,000 μ Sv. The limit has been set conservatively low, and considerably less than the annual dose limit for an occupational worker of 20,000 μ Sv. The 1,000 μ Sv dose limit is an administrative limit only and is not a threshold value for a health effect. Exposure to radiation greater than this limit in one year does not necessarily constitute a significant additional risk of a biological effect. For context, ARPANSA states that the natural background annual radiation dose in Australia is estimated to be approximately 1,500 μ Sv per year.

The *Public Radiation Risk Assessment* determined, based on a series of highly conservative assumptions, that the maximum annual dose of a person residing at Residence R1 would be 9.3 μ Sv.

The estimated dose rates associated with emergency situations such as a traffic accident resulting in a spill of Monazite Product were determined to be substantially less than the 1,000 μ Sv dose threshold. Similarly, radiation risks associated with the post mining landform were determined to be no higher than current levels.

The *Assessment of Environmental Radiation Impacts (Non-Human Biota)* relied upon internationally recognised assessment methodology. That assessment methodology includes three tiers of assessment, with Teir 1 intended to screen out scenarios with negligible radiological risk to non-human biota based on a screening dose rate of 10 μ Gy/h. The assessment determined, also based on highly conservative assumptions, that the highest dose rate for biota surrounding the Mine Site would be 0.18 μ Gy/h.

5.4.23 Visual Amenity

Representative Comment(s)

The mine will be an eye sore, just because we choose to live in this part of the state doesn't mean that people have the right to trash our visual amenity, the end product will be a vast expanse of poorly rehabilitated tree less plain for 20 kilometres by 3 kilometres. The statement that RZ resources will exercise its right on the other exploration leases means the visual loss will be seen from the moon. Somebody needs to show major common sense with this mine otherwise everything could be lost in this region.

Name Withheld, Rufus, New South Wales - Submission No. PO19

We will be able to see and hear this mine site for more than 17 years. Some of the mine pit will be on lower ground than our house, we will be able to look down into the pit from many vantage points on our farm.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Response

Section 6.13 of the *Amendment Report* presents an updated assessment of visual amenity impacts associated with the Project. That assessment concluded that the Project would result in the following potential changes to the visual amenity surrounding the Mine Site.

- Movement of mobile plant within the Mine Site.
- The Temporary Overburden Emplacement would be visible from sections of Nulla Road and private land surrounding the Mine Site.
- Fixed plant, in particular the Rare Earth Concentrate Plant, may be visible, from Nulla Road, albeit at a distance of approximately 10km.
- Changed landforms, including the dredge pond, Off Path Storage Facility and the rehabilitated final landform would be visible from sections of Nulla Road, Residence R1 and surrounding landholdings.
- Raised dust from the movement of mobile plant may be visible during the day from sections of Nulla Road and surrounding landholdings.
- Condensed steam emissions from the Rare Earth Concentrate Plant driers may be visible during periods of cool or humid weather.
- Direct and indirect views of lights from mobile or fixed plant may be visible at night from sections of Nulla Road and surrounding landholdings.

The Temporary Overburden Emplacement is likely to be the component of the Mine Site that would have the greatest change to the visual landscape surrounding the Mine Site. In summary, that structure would be visible from the southeastern section of the Huntingfield Station, as well as sections of Nulla Road. The Temporary Overburden Emplacement would not be visible from Residence R1.

5.4.24 Social and Housing Availability

Representative Comment(s)

I am concerned about the impacts this project would have in our local communities. The EIS notes there were 50+ rentals available in the Wentworth Shire, so there is a low risk that the mine will cause housing pressure. A recent article interviewed Mildura Real Estate agent Ryan Tierney (ABC Mildura – Swan Hill 28/05/2024). Mr Tierney noted that at one stage, he had more than 60 applicants applying for one rental. Mr Tierney was quoted saying "Every human deserves a home but if we don't have stock, we don't have places to rent.". Mildura and Wentworth rentals are managed by the same real estate agents, I understand there is already housing stress in our area. The project will add to that pressure in my view.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

Response

Section 6.14.6.3 of the EIS states that one individual consulted for the *Social Impact Assessment* raised housing availability as a concern. The Applicant notes the following in relation to this concern.

- The Project is located in driving distance of Wentworth, Mildura and a range of other communities along the Murray River, all of which provide housing options for potential Project employees and contractors.
- The Applicant proposes to establish a mine camp for on-site accommodation of workers. This would allow employees and contractors to be based further afield should they chose to do so.
- The Snapper and Ginko Mineral Sands Mines are due to close in the near future. This may alleviate some labour and housing constraints, allowing for the potential transition of mine workforce from those mines to the Project.

In addition, the Applicant would implement a range of management and mitigation measures to minimise the impact of the Project on local housing demand

- Develop a local business strategy or a formal procurement policy aimed at prioritising businesses within the Wentworth and Broken Hill LGA's.
- Preferentially engage local residents within the Wentworth and Broken Hill LGAs, with a particular focus on First Nations persons.
- Facilitate capacity building within the Wentworth and Broken Hill LGAs, including providing training and skill development opportunities for local residences and businesses, with a particular focus on First Nations persons and businesses.

The *Social Impact Assessment* determined that the implementation of the described management measures would ensure the impact would be effectively mitigated.

5.4.25 Economic

Representative Comment(s)

In the economics section Appendix 15 it is not clear if the analysis is based on the definition of "Mine Site" in Section 1, i.e. including our land. And there does not appear to be a breakdown of the cost benefit analysis of the project if we do, or, if we don't give our consent. I would have thought there must be an economic analysis of the project just on Warwick (given we have not given our consent) but that is not clear given these definitions.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

I cannot see how the project is viable without our farm. The Copi project plans to mine for 17 years, 7 of those years would be extracting minerals on our farm. RZ states in the EIS that they cannot mine our farm without our consent. This reduces the mine to 10 years of mining, which the EIS has not modelled for. The EIS is based on RZ mining for a full 17 years. This makes the economic viability of the project flawed.

...

The risk to our livestock is concerning. These elements could contaminate our meat. If any of our export partners tested our meat and found contamination, it would risk Australia's Agriculture industry and our reputation of providing clean healthy food to the world.

We plan to diversify our business. We plan to develop organic paddock to plate models, eco-tourism options, fly-in/fly-out stays utilising our airstrip, star gazing stays (we have phenomenal night skies), renewable energy opportunities and carbon credit trading. Our proximity to the Copi mine restricts our business potential. The visual impact, noise, sound, light glow and risk of contamination and radiation are major barriers. The Copi project damages our opportunities to grow and diversify in a changing world. The potential long-term effects of the mine will impact our business for many years to come.

...

Page ES-18, column 1, paragraph 4: 'the agricultural use of the total area of disturbance within the Mine Site is currently valued at approximately \$50,414pa.'

This statement is irrelevant, an estimate, and does not in any way represent the actual value of agricultural activities on the land. It does not consider different business models.

...

Appendix 15, Economic Impact Assessment, page 16 of 89: 'Impacts directly attributable to the project, in particular investments associated with developing and operating the coal mine, and revenues generated by the sale of coal'

I was under the impression the project was to mine Mineral Sands, not coal. Another example of the poor quality of this EIS.

Shane Vagg, Pine Camp, New South Wales - Submission No. PO30

Representative Comment(s)

The Economic Assessment is incomplete.

The assessment claims to present a cost benefit analysis. Only one side of the ledger has been presented, that is a claim for benefits to the community such as employment or expenditure on local goods.

There is no detailed assessment by the proponent on the cost of production of the products to be marketed.

There is no assessment of the cost of labour, energy such as electricity, diesel or LPG, or the cost of services, maintenance, etc.

The mining industry, in general, has seen considerable cost increases in energy and labour especially during and since the Covid period which has meant that some projects have become unsustainable. The proponent has made no attempt to estimate these costs as the project moves forward.

Bendigo District Environment Council – Submission No. OO01

If the Copi mine proceeds, at the end of the project, the employees would find themselves in the same situation as the Snapper and Ginkgo employees. With 'a substantial loss of well-paid employment opportunities'. If the Copi mine found that the project was no longer viable due to commodity prices or other factors, the employees would be in the same predicament. The employment opportunities offered by the Copi project are not sustainable long term, they will come to an end causing significant disruption to those employees and the greater community. Having lived in rural mining communities in central Queensland, I have seen this firsthand. In the boom times, house prices skyrocket and there are abundant jobs, in mine closure times, houses lose significant value and there are large job losses. These factors affect the local community, from staff and student numbers at local schools, nurses in the local hospitals, and many flow on effects throughout the community.

Ferna Vagg, Pine Camp, New South Wales - Submission No. PO24

In a report submitted to the Australian Securities and Investment Commission in 2023, independent auditor Mark Jeffery from KPMG found there was a "material uncertainty" over RZ Resources' finances. He said it "may cast significant doubt on the group's ability to continue its normal business activities and ensure that it operates as a going concern, and, therefore, that the group may be unable to realise its assets and discharge its liabilities in the normal course of business".

Name Withheld, Mutawintji, New South Wales - Submission No. PO15

The economic projections leave no doubt that the project is not a financial proposition before even starting. RZ resources claim that the mine will create 240 jobs and earn \$1b during the life of the project - say 20 years. This means that of that \$1b, assuming the average wage is \$120k there will only be \$424m for mine operations, finance costs, transport, refining, compliance and rehabilitation, let alone profit. Let's be clear, the projections would certainly be the most optimistic possible, the average wages would certainly be higher than \$120k, particularly with senior management taking salaries many times higher, and costs are always rising. This project is doomed from the start- it beggars belief that it has got to this stage. It is NOT economically feasible.

....

In closing, I assert that the economic credentials of this project do not come even close to break-even, the track record of RZ resources speaks for itself and the fact they are still in the industry must come as a surprise to many.

James Robertson, Renmark, South Australia - Submission No. PO18

Economic benefits

The current values of these materials to be sold also is questionable. Monazite at \$200 / kg looks great but it appears China, the main destination for this material, mines its own from rock at a far cheaper easier method, this means one thing .

Name Withheld, Rufus, New South Wales - Submission No. PO19

Questions should be considered that RZ Resources have the money to rehabilitate the proposed mine area and major compensation for damages to surrounding property ownership and re sale value.

Stuart Duncan, Wentworth, New South Wales - Submission No. PO32

Response

The company behind RZ Resources is not ASX listed so without ASX investor reports there is a lack of transparency.

Bendigo District Environment Council – Submission No. OO01

Response

The principal concerns raised by submitters included the following. Each of these issues have been addressed separately below.

- Viability of the Project with a reduced Mine Site Area.
- Restriction on diversification of operations on neighbouring land.
- Reference to coal in the Economic Impact Assessment
- Adequacy of the Economic Impact Assessment
- Impact of closure of the Project at the end of life
- Financial viability of RZ Resources and status as a private company
- Financial resources to undertake rehabilitation

Viability of the Project with a reduced Mine Site Area

The Applicant engaged Synergies Economic Consulting to update the *Economic Impact Assessment* for the amended Project based on the amended mine plan. That assessment is presented Appendix 16 of the *Amendment Report* and is summarised as Section 6.15 of that document. In summary, that assessment determined that the amended Project would remain viable based on the reduced mining area, with substantially reduced area of disturbance. Specifically, the amended Project would contribute the following economic benefits.

- Up to 480 direct full-time equivalent employment positions during construction and 240 positions during operations.
- A net present value of \$723 million over the life of the Project.
- A net benefit to NSW of \$214 million, including \$160 million in taxes and \$126 million in royalties.

- Non-labour expenditure within the Wentworth LGA of \$207 million during construction and between \$54.5 million and \$97.62 million each year during operations.
- Additional output within the Wentworth LGA of up to \$1.28 billion during construction and \$8.3 billion during operations.
- Support for 514 full time equivalent (FTE) positions during construction and 580 FTE positions during operations within the Wentworth LGA.

Furthermore, the Applicant has identified substantial additional resources within Warwick Station and anticipates that further applications to extract that material may be made during the life of the amended Project.

Restriction on diversification of operations on neighbouring land

The Applicant contends that that Project would not limit diversification of operations on neighbouring land and may indeed present a range of additional opportunities for neighbouring landholders to diversify their operations should they wish to do so.

Reference to coal in the Economic Impact Assessment

The identified reference to “coal” in the *Economic Impact Assessment* as exhibited relates to a typographical error in the glossary of that document. The *amended Economic Impact Assessment* presented as Appendix 16 of the *Amendment Report* has removed that typo.

Completeness of the Economic Impact Assessment

The *Economic Impact Assessment* for the Amended Project was prepared by Synergies Economic Consulting in accordance with the *Guideline for the Economic Assessment of Mining and Coal Seam Gas Proposals* (DPIE, 2015). The *Economic Impact Assessment* relied upon information provided by the Applicant and third-party market forecasts to assess the economic impacts of the Project.

Sections 6.1 and 6.2 of the *Economic Impact Assessment* describes in detail the assessment of the cost of the production of mine products that is involved in the construction and operation of the Mine and Processing Facility. This includes cost of labour, energy, services, and maintenance.

Additionally, Section 6.15 of the EIS presents a sensitivity analysis for the following components to account for variability over the life of the Mine.

- Discount rate \pm 2%
- Capital costs \pm 20%
- Operating costs \pm 20%
- Price projections \pm 20%
- Emissions allowance unit price \pm 50%
- Exchange rates (USD to AUD - +5 basis points)

As a result, the Applicant contends that the cost-benefit analysis was assessed sufficiently for the purposes of the Project.

Impact of closure of the Project at the end of life

The Applicant acknowledges the challenges associated with planned closure of mining operations, such as that that will be occurring at the Ginko and Snapper Mineral Sands Mines in 2025 and 2026. However, the Applicant rejects the submitter's assertion that potential impacts of mine closure in the mid-2040's should be a reason not to commence the Project. To do so would sterilise benefits that would be accrued in the intervening 20-year period and, if applied universally, prevent the commencement of any similar project in NSW or elsewhere. Finally, the Applicant notes that substantial mineralisation has been identified surrounding the proposed mining operation, including on Warwick Station and that refusing to commence this Project at this time would in effect sterilise the ability of the Applicant to extract a State-owned resource for the benefit of the State, local community and future generations.

Financial viability of RZ Resources

The Applicant states that it has sufficient financial resources to undertake the Project. Indeed, the Applicant recently announced a strategic partnership with Japanese firm JX Advanced Metals Corporation for a A\$20 million investment, with an additional contributions totalling A\$10 million.² The investment is the first part of an anticipated multi-stage commitment, joint venture framework and a long-term partnership between the two organisations.

Financial resources to undertake rehabilitation

The Applicant proposes to undertake substantial capital raising and debt financing following receipt of development consent and the commencement of mining operations. As a result, it contends that it will be well positioned at the commencement of operations to meet all of its obligations, including rehabilitation obligations.

Notwithstanding, rehabilitation operations would largely be undertaken progressively during the life of the Project. As a result, it is not anticipated that the Project would have a financially significant rehabilitation liability at the end of mining operations.

² [Australia-Japan strategic partnership to power critical minerals in NSW, June 2025 - RZ Resources](#)

6. Updated Project Justification

Section 7 of the *Amendment Report* presents an updated justification of the amended Project. In summary, the amended Project has been evaluated and justified principally through consideration of its potential impacts on the environment and potential benefits to the local and wider community.

An evaluation of the Project has been undertaken by firstly reviewing the Project against the strategic context and demonstrating its compliance with relevant statutory requirements. The Project was also assessed for compliance with community views and the principles of ecologically sustainable development. Finally, the Project has been assessed against a range of biophysical considerations.

Based on the above, the Applicant contends that the Project, as proposed, represents the most efficient design that minimises, to the greatest extent practicable, adverse environmental and other factors while maximising the benefits to the local, Regional, State and National economies.

Finally, it is assessed that the Project could be constructed and operated in a manner that will satisfy all relevant statutory goals and criteria, environmental objectives and reasonable community expectations.

7. References

DBH Radiation Pty Ltd (2025a). *Public Radiation Risk Assessment* prepared for RZ Resources Limited and presented as Appendix 14a of the Amendment Report.

DBH Radiation Pty Ltd (2025b). *Environmental Radiation Impacts (Non-Human Biota)* prepared for RZ Resources Limited and presented as Appendix 14b of the Amendment Report.

Department of Climate Change, Energy, the Environment and Water (DCCEEW) (2023). *National Light Pollution Guidelines for Wildlife.*

Department of Planning, Infrastructure and Environment (DPIE) (2015). *Guideline for the Economic Assessment of Mining and Coal Seam Gas Proposals.*

GEO-ENG (2025). Updated *Groundwater Impact Assessment*, prepared for RZ Resources Limited and presented as Appendix 4 of the Amendment Report.

National Uniform Drillers Licensing Committee (2020). *Minimum Construction Requirements for Water Bores in Australia*

Northstar Air Quality Pty Ltd (2025). Updated *Air Quality Impact Assessment*, prepared for RZ Resources Limited and presented as Appendix 12 of the Amendment Report.

Tonkin Consulting Pty Ltd (Tonkin) (2025). Updated *Traffic Impact Assessment*, prepared for RZ Resources Limited and presented as Appendix 9 of the Amendment Report.

Appendix 1

Submissions Register

(Total No. of pages including blank pages = 3)

Table A1
Submissions Register

Submission No	Organisation/ Public	Submission Type	Name	Location	Approvals - SSD Process	Approvals - Other Approvals Required	RZ Resources	Engagement	Proposed Operations - Mining	Proposed Operations - Rehabilitation and Final Land Use	Groundwater - Users	Groundwater - Contamination	Groundwater - Interference	Biodiversity - General	Biodiversity - Threatened Species and Ecological Communities	Soils and Agriculture	Aboriginal Heritage	Traffic	Surface Water - Users	Surface Water - Contamination	Noise	Air Quality - Dust	Air Quality - Health and Environment	Air Quality - Greenhouse Gas	Hazards - Radiation	Visual Amenity	Social	Economic - General	Economic - Employment	Economic - Feasibility
OO01	Organisation	Object	Bendigo District Environment Council	National Community - Victoria	1	1	1	1	1												1	1	1	1	1			1	1	
OS01	Organisation	Support	Wentworth Mechanical	Local Community - Wentworth and Surrounds																										
OS02	Organisation	Support	IHC Mining	Elsewhere																										
OS03	Organisation	Support	Wentworth Grande Resort	Local Community - Wentworth and Surrounds																										
PC01	Public	Comment	Phil Larwood	Near Neighbour Landholders																										
PC02	Public	Comment	Withheld	Local Community - Wentworth and Surrounds																										
PC03	Public	Comment	Withheld	Local Community - Wentworth and Surrounds																										
PC04	Public	Comment	Peter Family	National Community - Victoria																										
PC05	Public	Comment	Belmore Farms Pty	Near Neighbour Landholders																										
PO01	Public	Object	Withheld	National Community - Victoria				1												1										
PO02	Public	Object	Withheld	National Community - Victoria					1	1		1								1		1		1						
PO03	Public	Object	Greg Pollard	Local Community - Wentworth and Surrounds								1							1	1			1							
PO04	Public	Object	Withheld	National Community - Victoria								1		1						1	1	1		1						
PO05	Public	Object	Withheld	Near Neighbour Landholders			1							1									1	1						
PO06	Public	Object	Drew Vagg	Near Neighbour Landholders			1																1					1		
PO07	Public	Object	Withheld	National Community - NSW																					1					
PO08	Public	Object	Withheld	National Community - Victoria							1														1					
PO09	Public	Object	Withheld	Near Neighbour Landholders							1	1										1	1							
PO10	Public	Object	Michele Bos	Near Neighbour Landholders				1			1	1											1							
PO11	Public	Object	Melisa Kennedy	National Community - Victoria	1		1																							
PO12	Public	Object	Withheld	Local Community - Wentworth and Surrounds			1	1																						
PO13	Public	Object	Withheld	Local Community - Wentworth and Surrounds		1	1																		1					
PO14	Public	Object	Cara Beckton	Elsewhere			1			1	1							1		1	1	1			1					
PO15	Public	Object	Withheld	Local Community - Wentworth and Surrounds			1																		1				1	
PO16	Public	Object	Nola Bennett	National Community - Victoria	1		1																		1					
PO17	Public	Object	Withheld	National Community - Victoria		1	1			1	1			1					1	1	1		1	1				1	1	
PO18	Public	Object	James Robertson	Elsewhere			1				1			1		1		1							1				1	
PO19	Public	Object	Withheld	Local Community - Wentworth and Surrounds	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1	1		
PO20	Public	Object	Mathew Duncan	Near Neighbour Landholders							1	1			1						1	1								

Table A1 (Cont'd)
Submissions Register

Submission No	Organisation/ Public	Submission Type	Name	Location	Approvals - SSD Process	Approvals - Other Approvals Required	RZ Resources	Engagement	Proposed Operations - Mining	Proposed Operations - Rehabilitation and Final Land Use	Groundwater - Users	Groundwater - Contamination	Groundwater - Interference	Biodiversity - General	Biodiversity - Threatened Species and Ecological Communities	Soils and Agriculture	Aboriginal Heritage	Traffic	Surface Water - Users	Surface Water - Contamination	Noise	Air Quality - Dust	Air Quality - Health and Environment	Air Quality - Greenhouse Gas	Hazards - Radiation	Visual Amenity	Social	Economic - General	Economic - Employment	Economic - Feasibility		
PO21	Public	Object	Withheld	Elsewhere		1	1	1																								
PO22	Public	Object	Catherine Duncan	Local Community - Wentworth and Surrounds			1			1	1	1										1			1							
PO23	Public	Object	Benjamin Pollard	Local Community - Wentworth and Surrounds									1	1					1	1					1							
PO24	Public	Object	Ferna Vagg	Near Neighbour Landholders	1	1	1	1	1	1		1		1		1			1	1	1	1	1		1	1	1	1	1	1	1	
PO25	Public	Object	Withheld	Near Neighbour Landholders		1																	1									
PO26	Public	Object	Danny Mitchell	National Community - Victoria									1	1					1	1					1							
PO27	Public	Object	Rachel Severn	National Community - Victoria										1						1			1		1							
PO28	Public	Object	Withheld	National Community - Victoria			1							1			1							1	1							
PO29	Public	Object	Alexander McLeod	Local Community - Wentworth and Surrounds				1			1	1	1					1							1							
PO30	Public	Object	Shane Vagg	Near Neighbour Landholders	1	1	1	1	1	1	1		1		1	1		1	1		1	1			1	1	1	1	1	1	1	
PO31	Public	Object	Braidon Bennett	National Community - Victoria										1																		
PO32	Public	Object	Stuart Duncan	Local Community - Wentworth and Surrounds		1				1		1	1	1	1	1	1	1	1				1		1			1		1	1	
PO33	Public	Object	Lee Pollard	Local Community - Wentworth and Surrounds				1						1					1	1			1					1				
PO34	Public	Object	Withheld	Elsewhere	1	1	1	1						1										1	1							
PO35	Public	Object	Michelle Vagg	National Community - Victoria			1							1						1			1									
PO36	Public	Object	Adrian Hartley	National Community - Victoria						1		1		1						1					1							
PS01	Public	Support	Stef Golobic	National Community - Victoria	1	1	1	1	1												1	1	1	1	1			1		1	1	
PS02	Public	Support	Ezio De Angelis	National Community - Victoria																												
PS03	Public	Support	Miah Spary	Local Community - Wentworth and Surrounds																												
PS04	Public	Support	Kerry Ross	Local Community - Wentworth and Surrounds																												
PS05	Public	Support	Withheld	Elsewhere																												
PS06	Public	Support	Withheld	Elsewhere																												
					8	11	20	12	6	9	9	15	6	16	4	7	3	7	9	14	9	7	19	5	23	6	2	8	2	6	6	