

Department of Climate Change, Energy, the Environment and Water

Our ref: OUT26/3975

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Planning Group  
NSW Department of Planning, Housing and Infrastructure  
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22 April 2026

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Subject: Rasp Mine Modification 13 (MP07\_0018 – Mod 13) – Modification Report

Dear Emily Murray,

I refer to your request for advice sent on 1 April 2026 to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

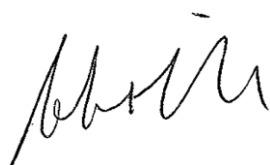
DCCEEW Water has reviewed the Modification Report and makes recommendations to:

- Provide a comprehensive assessment against the NSW Aquifer Interference Policy.
- Clearly define the maximum predicted water take from each water source.
- Update the Water Management Plan

Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact DCCEEW Water Assessments [water.assessments@dcceew.nsw.gov.au](mailto:water.assessments@dcceew.nsw.gov.au).

Yours sincerely



Rob Brownbill,  
Manager, Water Assessments, Planning & Knowledge Division  
Department of Climate Change, Energy, the Environment and Water

## Attachment A

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# Detailed advice to DPE Planning & Assessment regarding the Rasp Mine (MP07\_0018-Mod 13) – Modification Report

## 1.0 Water take and licensing

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### 1.1 Recommendation – pre-approval

Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to provide a table stating the maximum predicted water take per water year from all impacted water sources for the modification period and post mining.

#### Explanation

Insufficient information has been provided to understand the groundwater take associated with this modification. A table is requested that states the maximum volume of water take from each impacted water source during the proposed modification and post mining. The current water take estimate is consistent with the existing project so would not include additional inflows due to the modification for construction of the ladderway or tailings dewatering system. There is also mention of the need to dewater an existing void to commence the modifications extended mining footprint that may also increase water take. The estimates of water take need to be in accordance with the NSW Aquifer Interference Policy.

### 1.2 Recommendation – pre-approval

DPHI requests the proponent to demonstrate sufficient entitlement is held or can be obtained prior to water take occurring based on the updated take estimates requested in Recommendation 1.1 above.

#### Explanation

The updated take volumes required in the recommendation above should be compared to entitlement held to demonstrate sufficient entitlement is available for the project and its modifications. The use of carry over water is not supported as it increases the chances of non-compliance.

The proponent's explanation that WAL 31065 with 370 shares can carry over water to equal 407 shares is only possible when there is no water take in the previous water year. Which based on the proponent's description is not occurring (take is estimated to be approximately 300ML/year for current operations). Basing this carry over water calculation on unused water is outlined in Section 57 of the Water Sharing Plan for the NSW Murray Darling Basin Fractured Rock Groundwater Sources 2020. As carry over water volumes may not be available depending on previous water year usage, this approach to demonstrate sufficient entitlement is held is not supported.

The proponent needs to demonstrate sufficient entitlement is held to account for the water take or that additional entitlement can be obtained to account for the shortfall volumes prior to take occurring to meet the maximum estimated water take per water year.

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## 2.0 Water impact assessment and management

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### 2.1 Recommendation – pre-determination

DPHI requests the proponent to provide a comprehensive assessment against the NSW Aquifer Interference Policy.

#### Explanation

Although the Modification 13 Water Impact Assessment states that the proposed works are consistent with the NSW Aquifer Interference Policy, the assessment does not explicitly evaluate the proposal against the policy's criteria. Given the presence of known groundwater quality contamination at the site, including elevated metal concentrations in shallow perched groundwater, a more explicit demonstration of policy compliance is warranted.

### 2.2 Recommendation – post-determination

DPHI requests the proponent to update the Water Management Plan based on the proposed modification. The plan is also to include:

- Establishment of groundwater quality performance criteria for shallow perched groundwater (including lead);
- Definition of monitoring triggers and exceedance response actions; and
- Identification of contingency measures should elevated lead concentrations persist or worsen.

#### Explanation

The Mod 13 documentation and the 2024 Annual Review report ongoing groundwater monitoring but do not demonstrate that:

- groundwater quality objectives for lead have been defined;
- trigger levels have been established; or
- management responses are clearly articulated should elevated concentrations persist or increase.

Monitoring alone is insufficient to manage potential impacts. Without defined performance criteria and clear response actions, there is ongoing uncertainty about how risks associated with groundwater contamination are being effectively managed. DCCEE Water raised this issue previously on review of a Water Management Plan for the project and it is yet to be addressed.

While the Human Health Risk Assessment concludes that community exposure risks remain acceptable, this does not substitute for a groundwater impact assessment or address aquifer interference policy considerations.

End Attachment A

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