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Planning and Assessment Division
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Attention: brittany.golding@planning.nsw.gov.au

Woodlawn Mine MOD 3 Infrastructure and Final Land Use Updates – MP07_0143-Mod-3

Attention: Department of Planning, Housing and Infrastructure

I am writing in response to your request for the NSW Environment Protection Authority ("EPA") to provide advice regarding Application MP07_0143-Mod-3 to modify the project approval issued for the Woodlawn Zinc-Copper Mine Project (MP07_0143) located at 507 Collector Road, Tarago NSW 2580.

The EPA has reviewed the report submitted as part of the application and titled '*Woodlawn Mine PA 07_0143 MOD 3 Modification Report (March 2026)*', prepared by Onward Consulting Pty Ltd for DEVELOP Global Limited.

The EPA understands that the application seeks to modify the project approval, specifically:

1. Minor reorientations to infrastructure, including: the box cut and mine entry, paste plant facility, waste rock emplacement facility, waste and ore transfer pad and the magazine storage facility and one of the ventilation shafts.
2. Removal of Evaporation Dam 1 ("ED1") from the project approval.
3. Amendments to the wording of conditions, including Schedule 4, Condition 3, and Schedule 3, Conditions 1(g) and 1(h).
4. Clarifications to final land use and vegetation area conditions in Schedule 3, conditions 6 and 4.
5. Revision to conceptual project layouts, which reflects the above modifications.

It is understood that the proposal does not intend to seek to increase existing processing limits or alter operations at the facility. The EPA has reviewed the supporting information and advises it does not object to the Modification. The EPA has provided comments in response to the Modification report in Appendix A in this correspondence for consideration in determining the Application.

The EPA notes that Environment Protection Licence (EPL) No. 20821, issued to Tarago Operations Pty Ltd as a subsidiary of DEVELOP Global Ltd for the Woodlawn Mine, will require variation should the proposed amendments be approved by the Department of Planning, Housing and Infrastructure. Should the Department grant approval for the Application, the licence holder will be required to submit an application to vary EPL 20821.

NSW Environment Protection Authority

As the environmental steward and regulator of our State we are committed to a sustainable future. Join us on our mission to protect tomorrow together.

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Please note that the EPA has started to adopt the principles in the NSW Guide for Large Emitters (the Guide). For future applications or modifications which may increase greenhouse gas (GHG) emissions, the Applicant will be required to ensure consistency with the principles in the publicly available Guide and provide the following information:

- Estimation of the scope 1 and 2 greenhouse gas (GHG) emissions for the proposed modification
- Confirmation if the project (or a modification to an existing operation) is likely to emit 25,000 tonnes CO₂-e or more of scope 1 and 2 emissions

If GHG emission is estimated to be above 25,000 tonnes CO₂-e or more of scope 1 and 2 emissions, the Applicant may be required to prepare and submit a greenhouse gas assessment and a greenhouse mitigation plan. This approach is consistent with the principles in the publicly available NSW EPA Guide for Large Emitters and the Climate Change Assessment Requirements.”

If you have any questions about this response, please contact Vanessa O’Keefe via email at info@epa.nsw.gov.au.

Yours sincerely



Janine Goodwin 23.04.2026

Unit Head – Operations
Central West and Southern Coast & Tablelands

APPENDIX A – EPA Advice

Environmental Management Plans

The EPA understand that the proponent has committed to updating the environmental management plans for the project site following approval of MP07-0143-Mod 3.

Ventilation Shafts

The Modification report states that the applicant seeks approval for the use of the constructed ventilation shaft in its current location. It further states that one of the approved ventilation shafts (not yet constructed) will remain in the indicative location approved by MOD 2.

The air quality impact assessment presented in the 2016 EIS estimated annual total suspended particulate (TSP) emissions from the ventilation shafts at 47,304 kg/year. The assessment also reported predicted ground-level concentrations of air toxics at the most affected residence (within SML20). Modelling at the time indicated that the project, as described in the modification application, was unlikely to result in adverse air quality impacts at the nearest sensitive receiver.

The EPA recommends that the premises Air Quality Management Plan be updated to reflect any approval and associated environmental monitoring requirements.

Dam downstream of the historical waste rock dump.

The EPA has identified an unnamed dam located within the current operating area, situated downslope of the historical waste rock dump and within what appears to be the footprint of the Wind Farm project area. This dam now appears to be incorporated into the proposed project site. The modification report provides limited information regarding the dam's purpose, operational status, and its role within the broader site water management system.

Given the potential for interaction between this structure, historical waste rock, and proposed project activities, the EPA recommends that should the application be approved, the applicant ensure environmental risks are appropriately understood and managed, and if appropriate, the management, operation, and monitoring of this dam captured in the premises Water Management Plan.

Waste rock emplacement, central mine services area, approved paste plant, and waste & ore transfer pad minor extension/ permanent use

The EPA understands that, under Modification 3, the proponent proposes to relocate the approved waste rock emplacement areas to a location adjacent to the approved ROM pad, as well as to a new area situated adjacent to the box cut, as shown in Figure 3.2. The EPA also notes that Figure 3.2 indicates the former dolerite stockpile has been incorporated into the proposed waste and ore transfer pad footprint.

In addition, the proponent is seeking approval for the continued operation of the paste plant and the ore transfer pad in their current locations. The EPA observes that the existing paste plant footprint largely overlaps the previously approved area, with the remaining portions located entirely within land that has been approved as rehabilitated.

The modification report provides limited detail regarding the proposed construction, management, operation, and monitoring of these areas. To ensure environmental protection and regulatory compliance, the design, construction, and operational phases should be undertaken in accordance with recognised best-practice industry standards and all applicable legislative requirements. Appropriate safeguards and management measures must be implemented to avoid, minimise, or otherwise manage potential environmental impacts arising from the handling and placement of excavated material. This includes ensuring that any risks to surrounding landforms, surface water, groundwater, and ecological values are effectively mitigated.

A robust and transparent monitoring framework should also be established to evaluate the performance of control measures and to verify that the waste rock dump areas are functioning as intended over time. Monitoring outcomes should inform adaptive management responses where required.

Given the proposed changes, there is an opportunity to incorporate these modifications into an updated Waste Rock Management Plan and Water Management Plan. A revised plan would allow for clearer articulation of design criteria, operational controls, monitoring requirements, and contingency measures, ensuring that the management of waste rock remains consistent with contemporary environmental expectations and regulatory obligations.

Tailings Dam seepage

The EPA understands that TDS seepage is managed through upgrades completed by DEVELOP in 2023. This work was completed under a notice issued by the Resources Regulator (NTCE0009097).

The EPA notes that the proponent is seeking to modify the existing consent to extend the timeframe for the requirement to identify and repair the seepage from TDS to 5 years before closure.

Although this proposal is shifting to a rehabilitation measure, in this context, the EPA advises that it is essential that all tailings dams at the premises, along with their associated seepage control and containment infrastructure, are designed, constructed, and operated during asset life of the dam in a manner that ensures compliance with section 120 of the *Protection of the Environment Operations Act 1997*, which prohibits the pollution of waters.