

Gen Lucas
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Minerals Quarry Assessments
Department of Planning and Environment
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Our ref: DOC22/163673
Your ref: DA41/98-Mod 8

Dear Ms Lucas

Tritton Copper Mine Mod 8 – Budgerygar underground extension (DA41/98-Mod 8)

Thank you for your request dated 23 February 2022 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment inviting comments on the Budgerygar underground extension at Tritton copper mine.

BCS notes that there will be no direct clearing of native vegetation for the modification.

1 Further assessment of groundwater dependent ecosystems is required

Section 6.3.2.3 of the modification report states that a search of the *Bureau of Meteorology Groundwater Dependent Ecosystem Atlas* identified terrestrial groundwater dependent ecosystems (GDEs), of high medium and low potential, to be present on the site. The modification report then concludes that it is unlikely that the vegetation in these locations are GDEs given the deep groundwater levels identified in monitoring.

The report does not provide any information about the plant community types on the site or surrounds. Without this information, the claim that there are unlikely to be GDEs present has not been sufficiently justified.

If GDEs are present, baseline data should be collected for the relevant plant community types prior to underground mining commencing. A monitoring program should be established to determine whether impacts to groundwater are affecting GDEs. A trigger, action, response plan should be implemented.

Recommendations

- 1.1 Plant community types (PCTs) should be identified and mapped.
- 1.2 PCTs that are associated with groundwater dependent ecosystems should be identified.
- 1.3 A monitoring program should be implemented for groundwater dependent ecosystems which includes collection of adequate baseline data. This program should include a trigger, action, response plan.

2 Prescribed impacts should be assessed

Section 6.1 of the *Biodiversity Conservation Regulation 2017* lists additional biodiversity impacts to which the biodiversity offsets scheme applies. This includes the impacts of development on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities (including from subsidence or upsidence resulting from underground mining or other development).

An assessment following the *Biodiversity Assessment Method 2020* section 6.1.4 for water bodies, water quality and hydrological processes is required if these sustain threatened entities on the site. The assessor must:

- a. prepare a list of threatened entities that may use or depend on water bodies or hydrological processes for all or part of their life cycle, or
- b. prepare a list of threatened entities that will be, or are likely to be impacted by changes to existing water bodies or hydrological processes or the construction of a new water body
- c. describe the habitat provided for each threatened entity by the water body or hydrological process, including consideration of water quality, volume, flow paths and seasonal patterns (based on published literature and other reliable sources).

Recommendations

- 2.1 Threatened entities that may be impacted by changes to water bodies, water quality and hydrological processes should be identified.
- 2.2 If such threatened entities are present, an assessment following section 6.1.4 of the Biodiversity Assessment Method 2020 is required.

If you require any further information regarding this matter, please contact Liz Mazzer, Conservation Planning Officer, via liz.mazzer@environment.nsw.gov.au or (02) 6883 5325.

Yours sincerely



Samantha Wynn

Senior Team Leader Planning North West

Biodiversity, Conservation and Science Directorate

3 March 2022