



DOC22/330403

The Department of Planning, Industry and Environment
Return via the Major Planning Portal
Attention: Mr Jack Turner

3 May 2022

Dear Mr Turner

**Planning Referral – Aurelia Metals Ltd for Federation Project Hera Resources Pty Ltd
State Significant Development SSD-24319456**

Thank you for the invitation from the Department of Planning and Environment (DPE) sent to the Environment Protection Authority (EPA) on 4 March 2022 seeking comment on Hera Resources Pty Ltd's (Proponent) Environmental Impact Statement for the Federation Project Proposal (SSD-24319456).

The EPA has reviewed the Environmental Impact Statement titled "Federation Project, State Significant Development (24319456), Environmental Impact Statement" prepared by SLR Consulting Pty Limited on behalf of the Proponent dated January 2022 and accompanying attachments. The EPA has provided recommended conditions of approval and general comments in Attachment A.

The EPA understands that the Proposal relates to the following:

- The establishment and operation of underground gold and metalliferous mining activities, with supporting surface infrastructure, mining approximately 6.95 Mt of ore over a period of 12 to 14 years, referred to as the Federation Site.
- Amendments at Hera Mine to facilitate mining and processing of Federation ore, with works including a new process plant, disposal of tailings in the approved Hera Mine TSF and a new solar farm.
- Services Corridor between the Federation Site and Hera Mine, including powerline, water pipeline, access track and a potential tailings pipeline.

The Proposal would be subject to Environment Protection Licence 20179 (Licence) issued by the EPA under the *Protection of the Environment Operations Act 1997* (POEO Act) for the scheduled activities of mining for minerals, mineral processing and crushing grinding or separating.

The EPA has reviewed the Environmental Impacted Statement and accompanying attachment and request further information from the Proponent before providing DPE with its final advice. This information is in relation to the Air Quality and Greenhouse Gas impact assessment.

Air

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1. The EPA requests that the Proponent provides additional information to describe the activities undertaken at both the Hera Mine and Federation site, including the processing circuit, to demonstrate that the Air Quality and Greenhouse Gas Impact Assessment (AQIA) has accounted for all significant emission sources.

The Hera Mine and Federation site are inherently interlinked and will be covered by one environment protection licence. While the AQIA states that the “processing of ore will only take place at the Hera Mine, therefore is outside the scope of this project”, it is noted that the Proposal will produce ore within current development approvals in relation to the (505,000 tpa) and that the AQIA has assessed cumulative impacts due to activities undertaken at both projects, including the processing circuit. However, the AQIA does not include a detailed description of the activities undertaken at the Peak complex including the processing circuit and therefore it is unclear whether all relevant emission sources from this facility have been assessed.

2. The EPA requests that the Proponent revises the AQIA to benchmark the proposed mitigation measures against best practice dust control measures.

It is noted that the AQIA does not predict additional exceedances at any of the identified privately owned receptor locations and that it includes mitigation measures primarily through the use of water for dust suppression. Nonetheless, considering the location of all receivers a detailed review of best practice dust control measures is necessary to demonstrate that the proponent has evaluated and/or committed to all reasonable and feasible mitigation measures to prevent and minimise air pollution. Particular emphasis should be given to the largest emissions sources such as the proposed ventilation shaft, the existing ventilation shafts, and activities related to hauling and wind erosion. The EPA is seeking that the AQIA give consideration to, but need not be limited to, the following:

- Any measures to minimise emissions from the ventilation shafts, including those that can be implemented when undertaking underground works; and
 - The use of chemical suppressants to reduce emissions from haulage on unpaved roads.
3. The EPA recommends that the Proponent nominates and commits to the implementation of mitigation measures during the construction phase of the Proposal, if approval is granted.

The AQIA indicates that the construction phase of the Proposal is expected to take up to 12 months and therefore the potential emissions will be minor and short term in nature. Nonetheless, considering the proximity of the proposed construction works to receivers, the EPA considers that the Proponent must nominate and commit to specific mitigation measures to be undertaken during the construction works as required.

Based on the information provided to the EPA, the proponent will require a variation to Hera Resources PTY LIMITED'S Environment Protection Licence 20179 to construct and operate the proposed Federation Project if approval is granted. The proponent will need to make a separate application to the EPA at the completion of the assessment process.

If you have any questions about this matter, please contact Joshua Loxley on (02) 6883 5333 or by email at info@epa.nsw.gov.au.

Yours sincerely



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