

24 June 2022

File No: WST13/00017/08 | SF2012/049427
Your Ref: SSD5012

The Director
Resource Assessments
Department of Planning, Industry & Environment
NSW Major Projects Portal

Attention: Brittany Golding - Brittany.Golding@planning.nsw.gov.au

Dear Sir / Madam,

SSD-5012 - MODIFICATION OF SHORT-TERM ORE AND MINERAL CONCENTRATE TRANSPORT AND PROCESSING FOR ATLAS CAMPASPE MINERAL SANDS MINE

Dear Brittany,

Thank you for referring the abovementioned State Significant Development for the Modification Application, inviting comment from Transport for NSW (TfNSW) via the NSW Planning Portal on 17 May 2022

TfNSW's primary interests are in the road network, traffic and broader transport issues. In particular, the efficiency and safety of the classified road network, the security of property assets and the integration of land use and transport.

Silver City Highway (HW22) is a classified (State) road. Balranald – Ivanhoe Road (MR67) and Kanandah Road (RR7507) are classified (Regional) roads. Council is the roads authority for this road and other public roads in the area, in accordance with Section 7 of the Roads Act 1993 (Roads Act).

Transport for NSW Response

From a review of the Modification Report (the Report), TfNSW notes the following is understood:

- The proposal includes four (4) subject sites, which are referred to collectively as (part of) the Murray-Darling Basin Operations (MDBO) managed by Tronox, all of which are understood to be required to undertake the proposed modification. These are:
 - Atlas Campaspe Project Mine site (Atlas)
 - Ivanhoe Rail Loading Facility (Rail Facility)
 - Broken Hill Mineral Separation Plant (MSP)
 - Ginkgo Mine and Snapper Mine sites combined (Ginkgo / Snapper).

TfNSW understand there may be additional sites which also form part of the greater MDBO collective, however these have not been identified as part of this Modification Application.

- The proposed modification seeks *“to allow for the short-term transport of ore (rather than mineral concentrate) from the Atlas-Campaspe Project to the other MDBO sites for processing (the Modifications) to avoid delay to the commencement of Atlas-Campaspe Project production and therefore minimise production shortfalls for Tronox in 2022.”*
- The Atlas Campaspe Project Mine current approved haulage route/s consists of:
 - Route 1 - Atlas to Rail Facility (by road)
 - Relevant classified road:
 - (Regional road) Balranald - Ivanhoe Road (MR67)
 - Transporting a maximum of 665,000 tpa MC outgoing & waste on return (tpa unclear).
 - A maximum of 35 heavy vehicle (HV) trips outbound & 35 HV trips inbound per day.

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- Route 2 - Rail Facility to MSP (by rail)
 - Transporting MC outgoing & waste on return.
 - A maximum of four trains per week (one in any 24-hour period)
- The proposed changes in relation to the haulage route/s are understood to be as follows:
 - Route 1 - Atlas to Rail Facility (by road)
 - Transporting Ore instead of MC
 - No change to the daily maximum number of HV trips.
 - Route 2 - Rail Facility to MSP (by rail)
 - Transporting Ore instead of MC
 - No noted change to the maximum daily / weekly trips.
 - Route 3 - MSP to Ginkgo / Snapper (by road)
 - Additional (road transportation) route for this modification.
 - Route already approved and in use for Ginkgo / Snapper Mines.
 - Relevant classified roads:
 - (State road) Silver City Highway (HW22)
 - (Regional road) Kanandah Road (RR7507)
 - Transporting Atlas Ore inbound in existing (empty) HV's returning to Ginkgo / Snapper.
 - Transporting the processed Atlas MC outbound to the MSP.

Advice to the Consent Authority

There are a number of gaps in the assessment which have the potential to impact the road network, including the classified roads. This includes details such as the quantity / weight, (largest) design vehicle/s and the maximum number of daily HV trips required to transport the product/s along each route.

Prior to the Consent Authority making a determination, and to assist TfNSW in undertaking a sufficient assessment and determine the full impacts, the proposed modification may have on the road network, TfNSW require further information to understand:

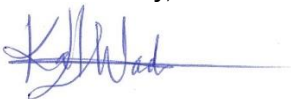
1. What the maximum tonnage (tpa) of product requiring transport will be under this proposed Modification.
 - Atlas has existing approvals to transport (along Route 1) a maximum of 665,000 tpa of MC to the MSP and to transport Waste on the HV return trips back to Atlas (it is unclear if there is a maximum tpa for this).
 - Ginkgo / Snapper Mines have existing approvals to transport a combined total of 975,000 tpa of MC to the MSP and 300,000 tpa of Waste on the return trips back to the mines.
 - What is the maximum tonnage (tpa):
 - of Atlas Ore to be transported along Routes 1, 2 and 3?
 - of Atlas MC to be transported along Route 3?
2. Under the proposed modification, what are the (largest) design vehicles proposed to transport the above identified (maximum tpa) Atlas Ore and Atlas MC, specific to each route? And what are the maximum daily HV trips required (inbound / outbound) to transport the Atlas Ore and MC along Route 3?
 - Transportation along Route 1 is currently conditioned for a maximum of 35 outbound and 35 inbound HV trips per day, and it is understood this will not change under the proposed modification.
 - TfNSW notes, that the existing Conditions of Consent for the each of the four (4) MDBO developments, (other than specified above) do not clearly identify either the maximum number of HV trips per day or identify the (largest) design vehicle undertaking the transportation for the individual route/s. At most, the vehicles are referred to simply as either "heavy vehicles" or "TfNSW approved vehicles".
 - As the current and proposed (largest) design vehicles and maximum daily number of HV trips for each road route is unclear, the ultimate impacts of any changes in the product and potential quantity of material being transported, remains unclear.
3. If any additional HV trips are required along Route 3, for the Atlas products being transported. This has not been appropriately quantified in the Modification Report.
 - Will the Atlas Ore being transported along Route 3 be wholly contained within the existing (empty) HV trips returning to Ginkgo / Snapper from the MSP, with exception to those already in use transporting the Waste product back to the mines? Or will additional HV trips be required?

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- Will the Atlas MC being transported along Route 3 to the MSP require an increase in HV trips, on top of the existing Ginkgo / Snapper MC HV trips to the MSP? Or are the required HV trips (and associated MC tpa) intended to become part of the maximum 975,000 tpa of MC approved to be transported to the MSP from Ginkgo / Snapper mines?
4. What the impacts will be on the road network, for any identified increase in HV trips and / or transported product weights along the identified routes, in particular:
 - The safety and efficiency of the classified roads, and key intersections along the haulage route/s.
 - The existing pavement condition, dilapidation reports and / or maintenance agreements with the relevant Councils and / or TfNSW.
 - Any previously conditioned road works / upgrades, either completed or pending commencement / completion.
 5. Which Mine site the waste for the Atlas MC product (processed further at the MSP), will be returned to, Snapper / Ginkgo or the Atlas site?
 - Should the subject Waste be returned to the Atlas site, it is understood the return trips of both the rail haulage and the (rail to Atlas) road haulage would be able to accommodate the Waste product within the empty carriages & HVs, and is approved to do so under the previous consent.
 - However, if it is to be returned to Ginkgo / Snapper, further information is required to understand the volume of product requiring transport and the HVs undertaking this transport. This should be clarified and quantified accordingly.
 6. TfNSW note, the existing Conditions of Consent for the separate MDBO sites, each address the preparation and implementation of a Transport Management Plan (TMP) differently.
 - TfNSW may wish to provide additional comments on receipt of the pending further information, regarding the potential to prepare a consolidated TMP to be implemented across all relevant MDBO sites and associated transportation routes, to support this Modification and to align all relevant policies and procedures, where applicable.
 7. TfNSW note, the Modification Report suggests an option to re-implement the proposed Modification on future occasions of potential breakdown of infrastructure at the Atlas site.
 - TfNSW may wish to provide additional comments on receipt of the pending further information, regarding the proposal to re-implement the Modification on future occasions, and any future need to consult with TfNSW in addition to the Department of Planning and Environment.
 8. TfNSW note, the Modification Report suggests but does not commit to a timeframe of approximately 6 months for the Modification.
 - TfNSW may wish to provide additional comments on receipt of the pending further information, regarding the potential for the Consent Authority to condition a set timeframe for this Modification, to ensure the proposed “short term” transport changes do result in longer term impacts on the road network.

If you have any further enquiries regarding the above comments please contact the below undersigned, via email at: development.west@transport.nsw.gov.au

Yours faithfully,



Katrina Wade
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