

Ms Mandana Mazaheri
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Dear Mandana

McPhillamys Gold Project – Amendment 2

Thank you for your e-mail dated 7 June 2022 to the Biodiversity, Conservation and Science Directorate (BCS) of the Department of Planning and Environment inviting comments on the second Amendment Report and updated Biodiversity Development Assessment Report (BDAR) for the McPhillamys Gold Project (Mine and Pipeline).

BCS has reviewed the Amendment Report and updated BDAR and understands that the proposed amendment includes changes to the pipeline footprint only, and no changes to impacts on biodiversity are proposed for the mine site.

Mine Site

BCS notes that the final credit liability for the mine site has changed due to quarterly updates to the data within the BAM Calculator (BAM-C). BCS confirms that there has been no change in footprint or data input into the BAM-C.

It should be noted that the credit figures that were provided in BCS's bilateral assessment have now changed. The following figures replace the figures presented in Table 1 and Table 2 of the bilateral assessment.

Entity	Credits
White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland	1,370
Koala	2,429

Pipeline

BCS notes that there are a number of changes to the final credit liability for the pipeline resulting from two factors; quarterly updates to the data within the BAM-C, and changes made to the management zones within the BAM-C that were entered incorrectly previously. Whilst BCS accepts these credit liability changes, there are a number of other amendments that have been made to the BAM-C that require clarification as they may impact on the final biodiversity credit requirement for the project. Our biodiversity recommendations are provided in **Attachment A** and detailed comments are provided in **Attachment B**.

If you require any further information regarding this matter, please contact Michelle Howarth, Senior Conservation Planning Officer, via michelle.howarth@environment.nsw.gov.au or (02) 6883 5339.

Yours sincerely

A handwritten signature in black ink that reads "Samantha Wynn". The script is cursive and fluid, with the first name and last name clearly distinguishable.

Samantha Wynn
Senior Team Leader Planning North West
Biodiversity, Conservation and Science Directorate

24 June 2022

Attachment A – BCS's Recommendations

Attachment B – BCS's Detailed Comments

BCS's recommendations

McPhillamys Gold Project – Amendment 2

BAM	Biodiversity Assessment Method
BAM-C	Biodiversity Assessment Method Calculator
BDAR	Biodiversity Development Assessment Report
IBRA	Interim Biogeographic Regionalisation for Australia

Recommendations

- 1.1. Include all suitable habitat in the species polygon for Large-eared Pied Bat and Brush-tailed Rock Wallaby or provide adequate justification for the exclusion of parts of the habitat.
- 2.1. Provide adequate justification for the changes made to the Booroolong frog species polygon in the Capertee Uplands and Bathurst (south option) IBRA subregions.
- 3.1. Ensure that the all data entered into the BAM-C is consistent with the BDAR and spatial data.
- 4.1. Provide adequate justification for the changes made to the Austral Toadflax and Silky Swainsona-pea species polygons in the Bathurst (north option) IBRA subregion.

BCS's detailed comments

McPhillamys Gold Project – Amendment 2

1. Large-eared Pied Bat and Brush-tailed Rock Wallaby species polygons are not consistent with Appendix G

Table 7 of Appendix G in the BDAR outlines the amount of potential habitat identified for each candidate species that has been assumed present within the proposed new section of pipeline in the Bathurst IBRA subregion (north option). Table 7 states that 2.43 hectares of potential habitat is present for both the Large-eared Pied Bat and the Brush-tailed Rock Wallaby however only 0.7 hectares of habitat has been entered into the BAM-C. In the absence of targeted surveys and where a species is been assumed as present all suitable habitat must be included in the species polygon.

Recommendation

- 1.1. Include all suitable habitat in the species polygon for Large-eared Pied Bat and Brush-tailed Rock Wallaby or provide adequate justification for the exclusion of parts of the habitat.

2. Booroolong Frog species polygon has been reduced

The species polygon for the Booroolong Frog has been reduced by 1.49 hectares in the Capertee Uplands IBRA subregion. BCS understands that the proposed amendment includes the removal of the Mount Piper blowdown pipeline in the Capertee Uplands IBRA subregion; however, the area removed is not associated with the Booroolong frog. It is not clear why this area has been reduced. The BDAR must clearly articulate and justify why changes to the polygon for the Booroolong frog have been made.

The species polygon for the Booroolong frog has also been reduced by 0.46 hectares in the Bathurst IBRA subregion (south option). The BDAR must clearly articulate and justify why changes to the polygon for the Booroolong frog have been made.

Recommendation

- 2.1. Provide adequate justification for the changes made to the Booroolong frog species polygon in the Capertee Uplands and Bathurst (south option) IBRA subregions.

3. Brush-tailed Phascogale species polygon has been reduced

The species polygon for the Brush-tailed Phascogale has been reduced in the Orange IBRA subregion in the BAM-C. In tab 6 of the BAM-C the assessor has entered 0.1 hectares for vegetation zone '277 intact' instead of 1.1 hectares. Based on the information provided in the BDAR and a review of the spatial data it appears that the correct figure is 1.1 hectares and the figure entered into the BAM-C is an error.

The data presented in the BDAR, spatial data and BAM-C must be consistent.

Recommendation

- 3.1. Ensure that the all data entered into the BAM-C is consistent with the BDAR and spatial data.

4. Austral Toadflax and Silky Swainsona-pea species polygons have been reduced

The species polygon for the Austral Toadflax and Silky Swainsona-pea has been reduced by 0.70 hectares in the Bathurst IBRA subregion (north option). The 0.70 hectares that have been removed from the polygon are part of the vegetation zone '1330 DNG', the area of this vegetation zone has not changed as a result of the pipeline amendment and therefore it is unclear why part of this vegetation zone has now been excluded from these species polygons. The BDAR must clearly articulate and justify why changes to the polygon for these species have been made.

Recommendation

- 4.1 Provide adequate justification for the changes made to the Austral Toadflax and Silky Swainsona-pea species polygons in the Bathurst (north option) IBRA subregion.