

Our ref: OUT25/14990

Brittany Golding
Planning Group
NSW Department of Planning, Housing and Infrastructure (DPHI)

Email: Brittany.Golding@planning.nsw.gov.au

13/11/2025

Subject: Taronga Tin Mine (SSD-74389710) Environmental Impact Statement

Dear Brittany Golding,

I refer to your request for advice sent on 2 October 2025 to the NSW Department of Climate Change, Energy, the Environment and Water (DCCEEW) Water Group about the above matter.

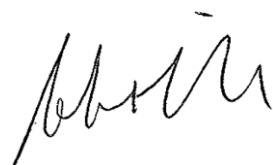
NSW DCCEEW Water Group has reviewed the Environmental Impact Statement and has prior to determination recommendations regarding:

- Confirming the location of water supply works and the potential for additional aquifer interference for pipeline trenching.
- Review of water management works in mine affected areas to ensure consistency with the Water Management (General) Regulation 2025.
- Assessment of water quality impacts due to seepage from waste disposal structures.

Please see **Attachment A** for more detail.

Should you have any further queries in relation to this submission please do not hesitate to contact the Water Assessments team at water.assessments@dcceew.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read "Rob Brownbill".

Rob Brownbill,
Manager, Water Assessments, Knowledge Division
NSW Department of Climate Change, Energy, the Environment and Water

Attachment A

Detailed advice to DPHI Planning & Assessment regarding the Taronga Tin Mine EIS

1.0 Water supply, take and licensing

1.1 Recommendation – pre-determination

That Department of Planning, Housing and Infrastructure (DPHI) requests the proponent to:

- Provide a map depicting the location of the proposed water pipelines from the borefield and identify where they are to be above or below ground.
- Confirm for any trenching activities for pipeline installation if groundwater is to be intercepted, and if so, quantify the maximum annual groundwater take and the requirement for licensing.

Explanation

Insufficient information is provided to understand the location of all water supply works (pipelines) and the potential for aquifer interference during construction. Additional information is required to enable exclusions to apply from a water supply work approval under the *Water Management Act 2000* and to determine the requirement for water licensing for groundwater take.

1.2 Recommendation – pre-determination

That DPHI requests the proponent to review the locations of all proposed bores to meet the distance rules defined in the Water Sharing Plan for the NSW Murray Darling Basin Fractured Rock Groundwater Sources 2020.

Explanation

A review of the proposed bore locations provided in the EIS documentation indicates a number may not meet the distance rule of 40 m from the high bank of a river. It is recommended the bores be located to meet this distance rule and provide a revised map where necessary.

1.3 Recommendation – pre-determination

That DPHI requests the proponent to review the ability for all works capturing water within the mine affected catchments to meet the excluded works requirements in Schedule 4, Part 7 of the Water Management (General) Regulation 2025 (WM Reg).

Explanation

The mine site water management infrastructure indicates a number of dams to be used to capture water from the mine affected catchments and the proponent references the use of excluded work provisions under the WM Reg. It is unclear how the water captured and removed in the open cut pits is being considered, noting to meet the excluded work provisions the work must be a dam. Further information on the application of excluded works is accessible in a factsheet which is accessible at:

<https://www.water.dcceew.nsw.gov.au/sites/default/files/2025-07/excluded-work-exemption-fact-sheet.pdf>

Where the captured water does not meet an exemption, the water will need to be accounted for via a Water Access Licence.

1.4 Recommendation – post determination

That DPHI requests the proponent to ensure relevant nomination of work dealing applications for Water Access Licences (WAL) proposed to account for water take by the project have been completed prior to the water take occurring.

Explanation

The existing WAL (WAL44962) referred to in the EIS does not currently nominate an extraction point. Taking water without having a nominated extraction point is an offence under Section 60D of the *Water Management Act 2000*. The relevant works will need to be linked to the WAL prior to take occurring. Should the works meet the exclusion under s.4.41 of the *Environmental Planning & Assessment Act 1979* the proponent will need to contact DCCEEW Water for a miscellaneous work prior to lodging the dealing application with WaterNSW.

2.0 Groundwater impacts, monitoring and management

2.1 Recommendation – prior to determination

That DPHI requests the proponent to assess the groundwater and surface water quality impacts from potential seepage at waste disposal structures.

Explanation

The EIS does not adequately assess the potential water quality impacts from seepage associated with the waste disposal structures, including the Waste Rock Emplacement, Co-Disposal Area and Residual Storage Facility.

2.2 Recommendation – post determination

That DPHI requests the proponent to expand the groundwater monitoring network to include areas surrounding the Waste Rock Emplacements (WREs), Co-Disposal Area (CDA), and Residual Storage Facility (RSF), to ensure adequate spatial coverage and enable early detection of potential impacts.

Explanation

The current number of groundwater monitoring bores near potential seepage sources is insufficient, resulting in limited spatial coverage. This restricts the ability for early detection and assessment of impacts around the RSF, CDA, and WREs.

2.3 Recommendation – post determination

That DPHI requests the proponent to review and recalibrate the numerical groundwater model at the end of Year 5 of mining, using observed data to improve accuracy in predicting groundwater inflows and levels.

Explanation

The proponent has committed to reviewing and recalibrating the groundwater model within two years of commencing mining and groundwater supply operations. In addition, due to high uncertainty in model predictions and the expectation that inflows to the northern pit will not occur until year five, a review at the end of 5 years would be a critical stage to align with observed conditions.

3.0 Works on waterfront land

3.1 Recommendation – post-determination

That DPHI requests the proponent to ensure:

- Works on waterfront land are in accordance with the Guidelines for Controlled Activities on Waterfront Land (DCCEEW 2024).
- The Sediment and Erosion Control Plan is developed in accordance with industry standards including the guideline, Managing Urban Stormwater: Soils and Construction (Landcom 2004).

Explanation

The project includes works such as roads, crossings and mining infrastructure within waterfront land. All works located within waterfront land should be designed and constructed in accordance with the Guidelines for Controlled Activities. This includes but is not limited to the internal access road and proposed road upgrades.

End Attachment A
