



18 December 2025

Mr. Steve O'Donoghue

Director Resource Assessments

NSW Department of Planning, Housing and Infrastructure

Locked Bag 5022

Parramatta NSW 2124

Dear Steve,

Subject: Rasp Mine (PA07_0018) – Modification 13 (MOD13)

1 Introduction

Broken Hill Operations Pty Ltd (BHO) owns and operates the Rasp Mine (the mine), which is located within the City of Broken Hill (see Figure 1).

BHO Rasp Mine operations are undertaken in accordance with Project Approval PA 07_0018 (as modified) granted from the then Minister for Planning on 31 January 2011, under Part3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act).

BHO is seeking to modify PA07_0018 (MOD13) pursuant to section 4.55(2) of the EP&A Act, for the following:

- extending mining operations into the British deposit
- installation of an escape ladder way from the underground workings to the surface
- changes to onsite operations to include a tailings dewatering system
- receipt and processing of ore from the Pinnacles Mine
- extending the life of PA07_0018 for five years, until 31 December 2031.

The purpose of this letter is to provide preliminary information and request the Department's concurrence on the approval pathway for the proposed modification and the level of assessment planned to be undertaken. This letter has been prepared in accordance with *State significant development guidelines, preparing a scoping report*

2 Approved project

PA07_0018 has been modified 12 times and allows mining operations at the mine until 31 December 2026, including extraction of up to 500,000 tpa, increased to 750,000 subject to further air quality impact assessment to the satisfaction of the EPA and revised limit approved by the Secretary, processing of ore on-site and deposition of tailings into the Blackwood Pit tailings storage facility (TSF2) and the Kintore Pit (TSF3).

3 Strategic context

The Rasp Mine is strategically important to the Far West Region. The mine is located within the City of Broken Hill and has operated since the 1880s. It is a major employer within the city and provides a range of benefits to the community.

The strategic need for the proposed modification is linked to continued support for economic diversity in the Broken Hill City Local Government Area. Rasp Mine continues to provide significant local jobs, investment, purchase of goods and services and taxes to the local and regional economy. Compared to its physical impact, Rasp Mine has a disproportionately large beneficial economic influence in the region.

The mine continues to align with State strategic planning frameworks, including the *Far West Regional Plan 2036*, which states that a sustainable mining sector in Broken Hill generates direct employment and provides flow-on benefits to communities.

Further, the mine aligns with local strategic planning frameworks such as the *Community Strategic Plan – Your Broken Hill 2040* which highlights the uniqueness of the City, recognises its mining history and the economic benefits the project brings to the City. Rasp Mine is integral to the delivery of the community strategic plan given its close links with Council and the local funding opportunities and partnerships it has with community organisations.

The *Broken Hill Local Strategic Planning Statement 2020–2040* lists Broken Hill as one of the world's great "mineralogical rainforests," where mining revenues are vital to Broken Hill and the rest of Australia. The plan also acknowledges mining as a major employer and primary driver of the Broken Hill economy.

4 Proposed modification

The proposed modifications to PA07_0018 are discussed further in the sections below.

4.1 Extension of mining into the British deposit

BHO is seeking to extend mining operations into the British deposit. British sits within ML Block 16 (see Figure 1) a historic mining block within CML7. This particular area at Rasp Mine has been subject to historical mining, first in the 1880s and again in the 1970s.

Underground mining would be conducting using approved methods and occur 24 hours per day, seven days a week, consistent with current practices on site.

Parallel to this modification application, BHO would apply for a new mining lease from EL5818 for the small portion of land outside of Consolidated Mining Lease (CML) 7 in which the British deposit also sits.

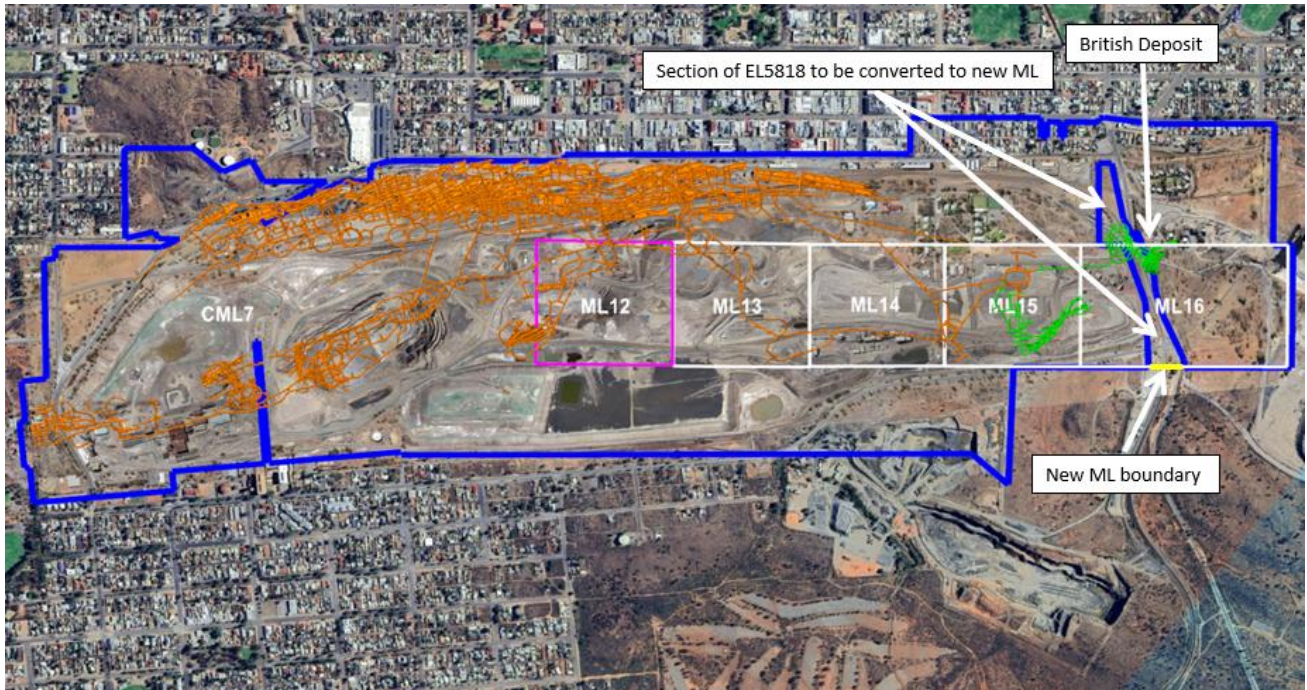


Figure 1: CML7, existing underground workings (orange) and extension of mining into British deposit

4.2 Installation of an escape ladder way

BHO is seeking to install an emergency egress ladder way from the underground workings to the surface in the northern area of CML7 (see Figure 2). BHO currently maintains 2 means of access/egress from the mine; the main portal and emergency escape ladder way from Stockpile 1 underground to the surface (approved in MOD9, see Figure 3), however this additional escape ladder way is to ensure that there exists a further suitable means of emergency egress from the northern areas of the mine as mining progresses further north including the British deposit.

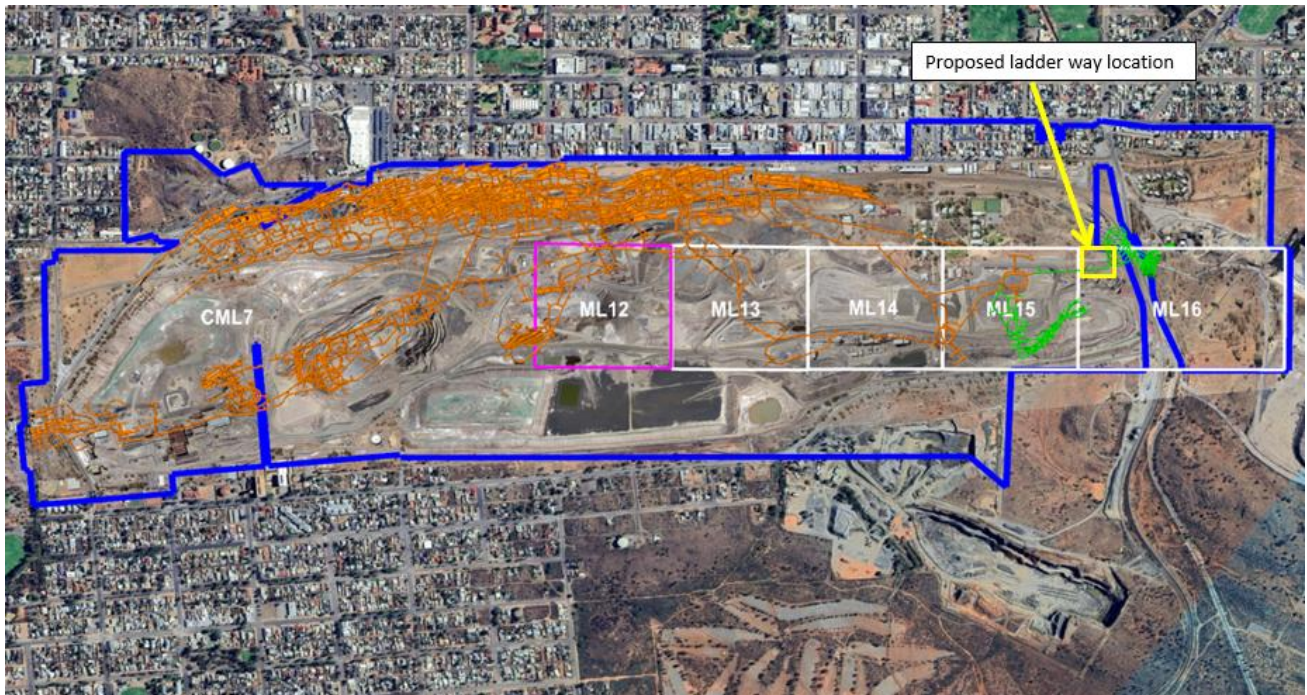


Figure 2: Proposed surface ladderway location



Figure 3: The Rasp Mine surface escape ladder way exit housing that was approved in MOD9.

4.3 Tailings dewatering system

BHO is seeking approval for tailings dewatering system to increase water recycling from tailings back into the operation and to continue to manage geotechnical and inrush into underground workings risks at the site's approved processing rate. The current approved tailings management procedures are limited to solar and wind desiccation of tailings (to

less than 15% moisture) at TSF2 before transport via truck to Kintore Pit (TSF3). Dried tailings are then placed in near horizontal layers at TSF3 and compacted with a roller.

The tailings dewatering system would consist of construction of a filtration plant and a tailings slurry line pipe and water return line between the filtration plant and Rasp Mine processing facility. The proposed filtration plant would be located adjacent to the Kintore Pit, in an enclosed building which would also contain a compressor, air dryer and instrument air. Power for the filter plant would be supplied from the existing system, with a new substation established adjacent to the filtration plant.

The filtration plant would produce a filter cake consist with the current solar desiccation procedure, which would be deposited in TSf3 via conveyor belt. Dried tailings are then placed in near horizontal layers at TSF3 and compacted with a roller. The tailings dewatering system layout is shown in Figure 4.

The proposed filtration plant will be constructed on a free area within the mine site. An updated map of free areas will be included in the Modification Report.

The proposed change in tailings deposition methodology would not necessitate a change of the mines approved final land use or rehabilitation objectives as the final land forms will remain the same.



Figure 4 Tailings dewatering system layout

The tailings dewatering system would significantly increase the amount of water recycled back into the operation. Consistent with the current solar and wind desiccation process, the tailings dewatering plant will reduce the water content of the tailings to below the threshold for liquefaction. The dewatering plants, together with ongoing compaction of deposited tailings, the portal plug and placement of rock (as approved in MOD6) will continue to mitigate the risk of inrush into the mine. Dewatering will also achieve a moisture content so the tailings material will not slump or liquefy from seismic events or mining blasting activity.

4.4 Importing and processing ore from Pinnacles Mine

BHO intends to receive ore from the Pinnacles Mine at Rasp Mine and process this ore at Rasp using the existing Rasp Processing Plant. Pinnacles Mine, owned by Pinnacles Mines Pty Ltd and operated by BHM, is located approximately 14 kilometres west of Rasp Mine. Pinnacles Mine is approved under Development consent (DA 13/13732), which was granted

under the then section 80(1)(a) of Division 2 of Part 4 of the EP&A Act on 25 June 2014. Parallel to this modification, Pinnacles Mines Pty Ltd is proposing to modify DA 13/13732 to allow for haulage of crushed ore from the Pinnacles Mine into Rasp Mine (via the Eyre Street entrance).

Ore receipt would occur in B-double trucks on a campaign basis and in accordance with current materials handling and processing limits to support ongoing processing requirements at Rasp Mine.

Pinnacles ore would be unloaded at the existing Rasp Mine ROM Pad and processed using the existing processing facility. Final concentrate products would be transported via rail to Port Adelaide. Tailings would be managed in accordance with approved Rasp Mine tailings management procedures. Existing tailings storage facilities and waste rock areas have sufficient capacity to handle the proposed import of ore from Pinnacles. Detailed information about the volumes/capacities would be included in the modification report.

The receipt and processing of Pinnacles ore would diversify the ore sources, enabling the Rasp Mine to optimise production, reduce costs and create greater operational stability. Pinnacles Mine ore is a key factor in extending the life of the Rasp Mine and supports the long-term future of the operation.

The import and processing of Pinnacles ore would be undertaken within existing processing limits in place at Rasp.

4.5 Extension of mine life

BHO is seeking to extend mining operations by five years, from 31 December 2026 to 31 December 2031. The extension of time is supported by the proposed mine plan, importation of ore from Pinnacles Mine and long-term planning for the site.

The Modification Report will detail the additional resource available, capacity of existing waste (tailings and rock) storage facilities, and the estimates of volume of material to be received from Pinnacles Mine to accommodate the additional five years of mine life. The Modification Report will also include a summary of the existing extraction, processing and waste generating rates at the site and how the modified project would comply with the existing approval limits.

5 Statutory context

The Rasp Mine Project (the Project) was approved on 31 January 2011 under Part 3A of the EP&A Act. Under clause 6 of Schedule 2 of the Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017, the project was transitioned to an SSD by order, which took effect by publication in the NSW Government Gazette on 4 July 2018.

In accordance with section 3BA(6) of the Environmental Planning and Assessment (Savings, Transitional and Other Provisions) Regulation 2017 the consent authority needs to be satisfied that the proposed modification is substantially the same development as last modified by Mod 4, granted on 6 September 2017. The proposed modification will allow the Project to remain substantially the same development as last modified under section 75W of the EP&A Act, as:

- the approved extraction rate, processing rate and transportation arrangements
- the approved surface disturbance area
- the rehabilitation strategy
- the management of waste rock
- the way in which the mine is ventilated
- the approved impacts of the mine overall.

BHO considers therefore that the approval pathway for the proposed modification is Section 4.55(2) of the EP&A Act.

6 Proposed environmental assessments

BHO proposes to conduct the following environmental assessments, which will be included in the Modification Report. The Modification Report will be prepared in accordance with *State significant development guidelines – preparing a modification report*.

- Noise assessment – a noise assessment will be undertaken for the modification of surface activities such as Pinnacles ore deliveries, emergency escape ladderway installation and tailings dewatering system
- Blasting assessment – a study will be conducted to assess development and production blasting within the British deposit.
- Water resources assessment – a groundwater and surface water assessment will be conducted for the proposed activities of the modification. A study will be conducted to determine if groundwater is a possibility of being encountered and/or impacted by underground mining, in accordance with the *Aquifer Interference Policy* (DPI 2012).
- Air quality assessment – an assessment of dust and air quality will be undertaken for the proposed activities of the modification, including the proposed tonnes per annum of extraction and processing (incorporating the additional tonnage from Pinnacles).

- A greenhouse gas assessment will also be undertaken, given the proposed extension of mine life.
- Geotechnical assessment – an assessment of stability and geotechnical of ground conditions for the extension of mining into the British deposit, taking into consideration surface features including the road and rail line.
- Inrush risk assessment – an inrush due diligence assessment will be undertaken for the extension of mining into British deposit.
- Waste rock assessment – a waste rock inventory assessment will be conducted to review and confirm availability of suitable waste rock for surface capping requirements as part of site rehabilitation requirements.
- Tails storage capacity – a tails storage capacity assessment will be undertaken to confirm that suitable tails storage exists for the proposed mining extension.
- Human health risk review – will consider the previous assessments undertaken at the site in context of the proposed Mod 13 activities.
- Social Impact Assessment will be undertaken to assess the impacts of extending the operation/project for an additional 5 years.
- An assessment of the compatibility of Pinnacles waste/tailings with the Rasp waste stream and waste handling and storage will be undertaken as these waste streams will be co-deposited at the Rasp mine following processing.

In addition to the detailed assessments listed above, BHO will also conduct due diligence assessments for other potential impacts including visual impacts, biodiversity impacts, traffic impacts, heritage impacts, and waste management. For traffic, the trucking of ore from Pinnacles will be undertaken in the Modification Report for Pinnacles and therefore a detailed assessment of traffic impacts will not be required.

7 Consultation

BHO conducted preliminary consultation with key stakeholders prior to lodging the scoping letter. A summary of the consultation and issues raised is listed below.

Agency	Date	Comments
DPHI – Resource Assessments	5 September 2025	BHO provided a presentation to DPHI on the current mine operations and discussed the future modifications required, including this proposed modification (MOD13)
	5 September 2025	BHO provided a draft scoping letter for review and comment. DPHI provided feedback on the draft scoping letter on 8/9/11 that was addressed in a subsequent scoping letter.
	25 November 2025	BHO submitted a scoping letter for MOD13. DPHI provided feedback on the scoping letter on 26/11/25 that was addressed in a revised scoping letter.

Agency	Date	Comments
EPA	1 December 2025	BHO provided a detailed notification letter with a request for comments to the EPA. The EPA responded that “the EPA currently have no comment and as outlined above we will review the Modification report and supplementary environmental assessments when formally submitted”.
NSW Resources Regulator Safety (RRS)	1 December 2025	BHO provided a detailed notification letter with a request for comments to RRS. In a phone conversation with RRS on 5/12/25, the RRS representative stated ‘they have no initial comment or issues at this time’.
NSW Resources Regulator Environment (RRE)	1 December 2025	BHO provided a detailed notification letter with a request for comments to RRE. RRE provided comment that the proposed modification “is lacking any detailed information on the required changes of land use for the location of existing tailings dewatering system dams. The proposal does not provide any detailed information on any new uses or rehabilitation requirements once these dams are decommissioned under the proposed new system”. BHO provided feedback that there would be no changes to the final land use of TSF closure plans and these issues would be included in scoping and the MOD Report.
NSW Health	3 December 2025	BHO provided a detailed notification letter with a request for comments to NSW Health. NSW Health responded with they “have no comments”

BHO will ensure consultation is conducted with key stakeholders to brief them on the proposed modification, including:

- Resources Regulator (Environment)
- Resources Regulator (Safety)
- Environment Protection Authority
- Mineral Exploration and Geosciences
- Dams Safety NSW
- Department of Climate Change, Energy, the Environment and Water
- Crown Lands
- Broken Hill City Council
- ARTC
- Transport for NSW
- Heritage NSW
- Perilya Broken Hill

Community engagement for the modification would be commensurate with the engagement undertaken for previous modifications. BHO continues to meet with the Broken Hill Lead Reference Group regularly and will provide the group with details on MOD13 for comment.

All comments received from stakeholders would be considered in the proposed assessments and Modification Report.

8 Conclusion

The proposed modification includes an extension of mining, importing and processing of Pinnacles Mine ore and installation of a tailings dewatering plant. The proposal is also requesting an extension to the life of PA07_0018 for five years.

The proposed modifications are substantially the same as already approved activities with no changes to production rates, extraction rates or surface disturbance areas. Following approval, it is envisaged the works would commence as soon as possible.

In order to progress the MOD13 application, BHO would appreciate it if the Department could confirm at the earliest convenience:

- That the assessment pathway would be Section 4.55(2) of the EP&A Act
- That the assessments described above in Section 5 of this letter are appropriate for the proposed modification.

BHO intends to lodge the modification application and supporting documentation in January 2025.

BHO appreciates your consideration of this request. If you have any enquiries about the proposal or would like to discuss the matter further, please do not hesitate to contact Joel Sulicich on 0427 610 774 or jsulicich@brokenhillmines.com.

Yours sincerely



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Rasp Mine

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Appendix A: Scoping Summary Table

Level of assessment	Matter	Cumulative impact assessment	Engagement	Relevant policies and guidelines
Detailed	Noise and vibration	No	Specific	• NSW Interim Construction Noise Guideline (DECC 2009). • NSW Noise Policy for Industry (EPA 2017). • NSW Road Noise Policy (DECCW 2011). • Assessing Vibration: A Technical Guideline (DECC 2006).
	Blasting	No	Specific	• Technical Basis for Guidelines to Minimise Annoyance due to Blasting Overpressure and Ground Vibration (ANZECC 1990) • British Standard BS 7385-2:1993, Evaluation and measurement for Vibration in Buildings – Part 2: Guide to Damage Levels from Ground Borne Vibration.
	Water	No	General	• Managing Urban Stormwater: Soils and Construction Volume 1 (Landcom 2004). • Managing Urban Stormwater: Soils and Construction Volume 2 (DECC 2008). • Aquifer Interference Policy (DECC 2012)
	Air quality and Greenhouse Gas	No	General	• Approved Methods for the Modelling and Assessment of Air Pollutants in New South Wales (EPA 2022) • NSW Guide for Large Emitters (EPA 2025)
	Geotechnical assessment	No	General	• Guidance Material for Mine Design – NSW Resources Regulator • Guidelines for Assessment of Geotechnically Safe and Stable Mine Landforms – ACARP
	Tailings storage	No	General	• Australian National Committee on Large Dams Guidelines on Tailings Dams (ANCOLD 2019)



Level of assessment	Matter	Cumulative impact assessment	Engagement	Relevant policies and guidelines
	Social Impacts Assessment	No	Specific	Department of Planning, Housing and Infrastructure Social Impact Assessment Guideline (July 2025)
Standard	Visual amenity	No	General	Guidelines for Landscape and Visual Impact Assessment (3rd Edition) (Landscape Institute 2013)
	Traffic and access	Yes	General	- Guide to Transport Impact Assessment (TfNSW 2024). - Austroads Guides to Traffic Management (various publications).
	Historical heritage	No	General	- Guidelines for Preparing a Statement of Heritage Impact (DPE 2023) - Assessing Heritage Significance (DPE 2023) - NSW Heritage Manual (Heritage Office and Department of Urban Affairs and Planning, 1996)
	Human Health	No	Specific	- Environmental health risk assessment guidelines for assessing human health risks from environmental hazards (enHealth 2012). - Lead Risks at Broken Hill, New South Wales, Australia (Taylor MP, Isley CF, Lyle D, Cattle S, Dong C, Juhasz A, Morrison AL 2019). Environmental
	Waste	No	General	Waste Classification Guidelines – Part I Classifying Waste (EPA 2014).
	Biodiversity	No	General	<i>Biodiversity Conservation Act 2016</i> (Section 7.17)