

4 July 2022

Department of Planning and Environment  
Locked Bag 5022  
PARRAMATTA NSW 2124

**Attention: Stephen O'Donoghue, Director Resource Assessments  
Brittany Golding, Planning Officer Resource Assessments**

Via email: [Stephen.ODonoghue@planning.nsw.gov.au](mailto:Stephen.ODonoghue@planning.nsw.gov.au), [Brittany.Golding@planning.nsw.gov.au](mailto:Brittany.Golding@planning.nsw.gov.au)

Dear Stephen and Brittany,

**RE: MURRAY-DARLING BASIN OPERATIONS SHORT-TERM ORE TRANSPORT AND  
PROCESSING MODIFICATIONS – SUBMISSIONS REPORT**

***Introduction***

Tronox Mining Australia Limited (Tronox) is the proponent of the following mineral sands mining and processing operations located in the Murray-Darling Basin, in far west New South Wales (NSW):

- Broken Hill Mineral Separation Plant – approved under Part 4 of the NSW *Environmental Planning & Assessment Act 1979* (EP&A Act) in 2002 (Development Consent [DA 345-11-01]);
- Atlas-Campaspe Mineral Sands Project – approved under Part 4 of the EP&A Act in 2014 (Development Consent [SSD\_5012]);
- Snapper Mineral Sands Mine – approved under Part 3A of the EP&A Act in 2007 (Project Approval [06\_0168]); and
- Ginkgo Mineral Sands Mine – approved under Part 4 of the EP&A Act in 2002 (Development Consent [DA 251-09-01]).

These mineral sands mining and processing operations are referred to as the Murray-Darling Basin Operations (MDBO).

In April 2022, Tronox submitted an application to modify all four of the MDBO approvals under section 4.55(1A) of the EP&A Act (the Modifications) to the NSW Department of Planning and Environment (DPE).

The DPE provided the Modification Report to relevant NSW Government agencies and local councils for review in May 2022.

This Submissions Report has been prepared in consideration of the *State significant development guidelines – preparing a submissions report* (DPE, 2021).

## ***Analysis of Submissions***

Submissions on the Modifications were received from the following NSW Government agencies and local councils:

- Transport for NSW (TfNSW)
- Resources Regulator;
- Environmental Protection Authority (EPA);
- Department of Regional NSW – Mining, Exploration & Geoscience (MEG);
- Central Darling Shire Council (CDSC);
- Broken Hill City Council (BHCC); and
- Wentworth Shire Council (WSC).

TfNSW raised no major concerns with the Modifications within its submission, however it did have some comments and requested some clarifications on the Modifications. These comments and clarifications are categorised as “project” and “economic, environmental and social impacts of the project” matters as defined in the *State significant development guidelines – preparing a submissions report* (DPE, 2021).

The submissions from the Resource Regulator, EPA, MEG, WSC, BHCC and the CDSC raised no significant issues regarding the Modifications, with no significant comments provided.

The Balranald Shire Council has not provided a submission at the time of writing.

No submissions from individuals or special interest groups were received on the Modifications.

## ***Actions Taken Since Exhibition***

Based on the submissions received on the Modifications:

- no refinements to the MDBO compared to that presented in the Modification Report are proposed; and
- no further environmental assessment for the Modifications has been conducted since lodgement of the Modification Report.

Tronox continued to engage with key stakeholders regarding the Modifications during the preparation of this Submissions Report.

## ***Response to Submissions***

Attachment 1 contains specific responses to the TfNSW comments and requests for clarifications.

***Updated Project Justification***

The Modification Report concluded that the Modifications are, on balance, considered to be in the public interest of the State of NSW.

Based on Tronox's consideration of the submissions on the Modifications, Tronox considers that the justification provided in the Modification Report remains unchanged.

Please don't hesitate to contact the undersigned if you have any queries or wish to discuss.

Yours sincerely,



Chaka Chirozva  
Approvals and Stakeholder Specialist  
Tronox Mining Australia Limited

ATTACHMENT 1

RESPONSES TO TRANSPORT FOR NEW SOUTH WALES COMMENTS ON THE  
MURRAY-DARLING BASIN OPERATIONS  
SHORT-TERM ORE TRANSPORT AND PROCESSING MODIFICATIONS

**Table 1  
Responses to Transport for New South Wales**

	<b>Comment</b>	<b>Tronox Response</b>
1	<p><i>What the maximum tonnage (tpa) of product requiring transport will be under this proposed Modification.</i></p>	<p>Up to 665,000 tonnes per annum (tpa) of mineral concentrate is approved to be transported from the Atlas-Campaspe Mineral Sands Project (the Atlas-Campaspe Project) to the Broken Hill Mineral Separation Plant (MSP) (Routes 1 and 2) and up to 65,000 tpa of MSP process waste is approved to be transported from the MSP to the Atlas-Campaspe Project (Routes 1 and 2).</p> <p>The Modifications would result in the transport of up to 665,000 tpa of ore from the Atlas-Campaspe Mine to the Ginkgo Mineral Sands Mine (Ginkgo Mine) and/or Snapper Mineral Sands Mine (Snapper Mine) via the MSP (Section 3.2.2 of the Modification Report) (Routes 1 to 3). To be clear, no mineral concentrate would be transported from the Atlas-Campaspe Project while ore from the Atlas-Campaspe Project is being transported.</p> <p>Up to 975,000 tpa of mineral concentrate is approved to be transported from the Snapper and/or Ginkgo Mines via the haulage route to the MSP for processing and up to 300,000 tpa of MSP process waste is approved to be transported from the MSP to the Snapper and/or Ginkgo Mines (Route 3). The combined Atlas-Campaspe Project, Snapper Mine and Ginkgo Mine mineral concentrate production would remain within the approved transport limit (i.e. 975,000 tpa) as a result of the Modification (Section 3.4.2 of the Modification Report). The amount of mineral concentrate generated from the processing of Atlas-Campaspe Project ore is expected to be approximately 50,000 tpa.</p> <p>The Modifications would therefore <u>not</u> result in an increase in the currently approved maximum transport rates on Routes 1 to 3.</p>
2	<p><i>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?</i></p>	<p>Tronox Mining Australia Limited (Tronox) currently uses a fleet of Transport for NSW (TfNSW) approved vehicles, including double and AB-triple road trains, to transport materials between the Ginkgo and/or Snapper Mines and the MSP (Route 3). Up to 37 haulage trips (i.e. 74 movements) between the Ginkgo and/or Snapper Mines and the MSP in any 24-hour period are currently approved. The Modifications would not change the approved haulage vehicle type or frequency on Route 3 (Section 3.3.2 of the Modification Report).</p> <p>Tronox is currently approved to use Type 1 Road Train vehicles to transport material between the Atlas-Campaspe Mine and the Ivanhoe Rail Facility (Route 1). Up to 35 haulage vehicle trips (i.e. 70 movements) between the Atlas-Campaspe Mine and the Ivanhoe Rail Facility in any 24-hour period are currently approved. The Modifications would not change the approved haulage vehicle type or frequency on Route 1 (Section 3.3.2 of the Modification Report).</p>

**Table 1 (cont.)  
Responses to Transport for New South Wales**

	<b>Comment</b>	<b>Tronox Response</b>
3	<i>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.</i>	<p>Atlas-Campaspe Project ore would be transported from the MSP in empty mineral concentrate haulage vehicles returning to the Snapper and/or Ginkgo Mines (similar to the approved MSP process waste transport) where possible. The Modifications would not result in an increase in the following currently approved maximum vehicle movements between the Ginkgo and/or Snapper Mines to the MSP (Route 3) (37 haulage trips or 74 movements) (Section 3.3.2 of the Modification Report).</p> <p>The combined Atlas-Campaspe Project, Snapper Mine and Ginkgo Mine mineral concentrate production would remain within the approved transport limit (i.e. 975,000 tpa) between the Snapper and Ginkgo Mines and the MSP (Route 3) as a result of the Modification (Section 3.4.2 of the Modification Report).</p>
4	<i>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 ...</i>	<p>As the Modifications would not change the approved haulage route, haulage vehicle type, haulage vehicle frequency or road upgrades on Routes 1 to 3, no additional road transport impacts are expected as a result of the Modifications (Section 6.2 of the Modification Report).</p>
6	<i>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.</i>	<p>Tronox manages potential road transport impacts of the Murray-Darling Basin Operations (MDBO) in accordance with the following documents:</p> <ul style="list-style-type: none"> <li>• Eastern Operations Traffic Management Plan and Code of Conduct (Tronox, 2021) – outlines the management of MDBO traffic on Route 3 and prepared in accordance with relevant conditions of MSP Development Consent (DA 345-11-01), Ginkgo Mine Development Consent (DA 251-09-01), and Snapper Mine Project Approval 06_0168).</li> <li>• Atlas-Campaspe Mineral Sands Project Transport Management Plan (Cristal Mining, 2018) – outlines the management of MDBO traffic on Route 1 and 2 and prepared in accordance with the relevant conditions of the Atlas-Campaspe Project Development Consent (SSD_5012).</li> </ul> <p>Tronox considers that there is no need to further consolidate the road transport management plans for the MDBO.</p>
7	<i>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.</i>	<p>If the operations proposed in the Modifications were adopted on a short-term basis in the future, subject to consultation with the NSW Department of Planning and Environment (Section 3.1 of the Modification Report), Tronox would also consult with TfNSW.</p>

**Table 1 (cont.)  
Responses to Transport for New South Wales**

	<b>Comment</b>	<b>Tronox Response</b>
8	<p><i>TfNSW note, the Modification Report suggests but does not commit to a timeframe of approximately 6 months for the Modification.</i></p>	<p>The proposed six month period for the transport of ore (rather than mineral concentrate) from the Atlas-Campaspe Project was based on Tronox's estimated timing for the commissioning of the approved mineral processing infrastructure at the time (i.e. December 2022). A definitive date for the commissioning of the approved mineral processing infrastructure is not however able to be provided due to the uncertainty in the timing of the delivery of key components of the approved mineral processing infrastructure due to ongoing COVID-19 related supply chain issues.</p> <p>In regard to the potential for longer term impacts on the road network, it is noted that no additional road transport impacts are expected as a result of the Modifications, as the Modifications would not change the approved haulage route, haulage vehicle type, haulage vehicle frequency or road upgrades on Routes 1 to 3 (Section 6.2 of the Modification Report).</p>