

August 11, 2020

Andrew Rode
Senior Environmental Assessment Officer
Planning & Assessment
Department of Planning, Industry & Environment
4 Parramatta Square, 12 Darcy St, Parramatta NSW 2150

Dear Andrew,

RE: COVID-19 TEMPORARY CHANGES TO ENVIRONMENTAL MONITORING REQUIREMENTS

Given the current COVID-19 epidemic Tronox Mining Australia have maintained operational sites under strict orders administered by the NSW, VIC & SA Government and Tronox Global site rules and guidelines to protect mine workers.

With the ever-changing border restrictions between VIC, SA and NSW and strict orders for essential site personnel it has become increasingly difficult to uphold the NSW environmental monitoring obligations under Tronox's Development Consents, EPA Licences and Environmental Management Plans.

Advice from the NSW Government was published on 22 July 2020, that exempt workers under the "Critical Services- agriculture, construction, energy, mining or manufacturing" are only exempt if they are considered front line workers essential to the operational support of the mining or processing operations. (COVID-19 Border Control Order 2020). Workers that reside in Victoria that live outside the border zones (50km) from 7 August now require to be highly specialized, not available locally in the same form, not able to be provided remotely and approved by the head of the organization. They are also required to fly into Sydney Airport and self-isolate. (COVID-19 Border Control Order 2020)

Tronox are mitigating the risk of COVID 19 by limiting workers onsite to essential personnel that are critical to the operation and maintenance of plant and infrastructure. New contractors/consultants required for work are assessed by the management team to determine if they meet the criteria of the Tronox COVID safety plan and NSW Government directions.

It is in Tronox's opinion that environmental monitoring work does not directly contribute to the operation and maintenance of important infrastructure for the continuity of mining operations or processing.

Given the remote location of Tronox mine sites and Mineral Separation Plant, the ability to procure consultants for environmental monitoring from other locations including NSW would be extremely difficult. The closest domestic airport is Broken Hill which is currently operating with very limited flights.

Advice from the Victorian Government is to work from home if you can, Tronox has restricted several departments of the business to working from home to limit personnel onsite.

This letter is to request a temporary change to frequency or suspension of environmental monitoring requirements under the applicable Development Consents and Environmental Management Plans for all Murray Basin sites and associated Biodiversity Offsets operated or maintained by Tronox Mining.

- Broken Hill Mineral Separation Plant
- Ginkgo and Crayfish mines
- Snapper mine
- Atlas-Campaspe mine (under construction)
- Ivanhoe rail facility (yet to be constructed)

Tronox intend to try and continue environmental monitoring for parameters that can be effectively completed inhouse. Changes to some frequencies will allow monitoring

to be undertaken concurrently with limited available resources. It is proposed that environmental monitoring that requires specialist consultants is suspended until such time border restrictions are eased.

The request is for the change in frequency or suspension of the following environmental monitoring:

Table 1

Site	Parameter	Applicable Consent	Condition	Required Frequency	Proposed frequency
Ginkgo Mine	Air Quality (dust deposition)	DA251-09-01	Sch 3, Cond 16	Monthly	Quarterly
Ginkgo Mine	Groundwater (Level and Quality)	DA251-09-01	Sch 3, Cond 11	Quarterly	No change
Ginkgo Mine	Flora and Fauna	DA251-09-01	Sch 3, Cond 20 & 34	Annual	Suspend
Snapper Mine	Air Quality (dust deposition)	06_0168	Sch 3, Cond 14	Monthly	Quarterly
Snapper Mine	Groundwater (Level and Quality)	06_0168	Sch 3, Cond 5	Quarterly	No change
Snapper Mine	Flora and Fauna	06_0168	Sch 3, Cond 17 & 19B	Annual	Suspend

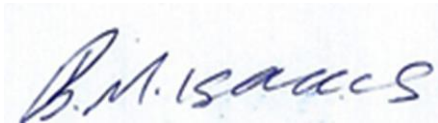
Broken Hill MSP	Air Quality (dust deposition)	DA 345-11-01	Sch 2, Cond 6.4 (i)	Monthly	Quarterly
Broken Hill MSP	Air Quality (Stack emissions)	DA 345-11-01	Sch 2, Cond 6.4 (i)	Annual	Suspend
Atlas-Campaspe	Air Quality (dust deposition)	SSD_5012	Sch 3, Cond 21	Monthly	Quarterly
Atlas-Campaspe	Air Quality (PM10 & TSP)	SSD_5012	Sch 3, Cond 21	Every 6 days	Suspend
Atlas-Campaspe	Groundwater (Level and Quality)	SSD_5012	Sch 3, Cond 26 (f)	Quarterly	No change
Atlas-Campaspe	Surface water	SSD_5012	Sch 3, Cond 26 (e)	6 monthly	No change
Atlas-Campaspe	Attended noise	SSD_5012	Sch 3, Cond 18	Quarterly	Suspend
Atlas-Campaspe	Flora and Fauna	SSD_5012	Sch 3, Cond 14	Annual	Suspend
Atlas-Campaspe	Pest animal and weeds	SSD_5012	Sch 3, Cond 14	Quarterly	Suspend

The following supporting information is provided to the Department when considering the request.

- Tronox Mine sites are remote and isolated from the community; therefore, its operations are considered very low risk to the community and include strict adherence to the legislation and internal requirements to reduce community risk.
- The nature of mineral sands mining poses little risk to the environment.
- Tronox owns majority of the land that the mining leases occupy and there are no neighbors near the mine sites. Closest residence is 4km to the Snapper mine site.
- It has become increasingly difficult for environmental staff to travel between borders to undertake works as required.
- It has been increasing difficult to engage consultants for environmental monitoring due to cross border restrictions, site policies and limited flights.
- Analysis of samples has become difficult because of logistical issues when transporting samples to NATA accredited laboratory's by air and road.
- Tronox Mining (formerly Cristal Mining and Bemax Resources) have been operating in the Murray Basin Region for over 15 years and have a reputable track record in community and environmental performance.
- Substantial environmental monitoring data has been obtained and analysed over the life of Tronox's projects in the Murray Basin. More than 12 months of background data for the Atlas-Campaspe site has been obtained prior to construction.
- Current NSW Government direction order states that only essential mine workers that directly contribute to the operation and maintenance of critical infrastructure are permitted from Victoria and South Australia.

Given the unprecedented situation and ever changing travel and work restrictions, Tronox is requesting changes outlined in Table 1 for a period of 6 months (Until 31 January 2021) or until such time that an improvement in the COVID-19 epidemic results in an easing of the current travel and work restrictions, and allows the successful reinstatement of all required environmental monitoring.

Yours Sincerely,



Brendan Isaacs

Environmental Lead

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