Our reference: DOC19/259666

Attention Andrew Rode

Department of Planning, Industry and Environment

Hawsons Iron Ore – Major Project (SSD_5537),
Unincorporated Area of NSW

I refer to the email (sent Friday 1st November 2019) and request to the Far West Area of the NSW Department of Industry, Planning and Environment– Crown Lands (the department), in relation to the above project.

The department has now had the opportunity to review the Scoping Report and has provided the following comments below:

Crown land tenures

The department notes that access to the mine will be via the Silver City Highway and then 30km west from the highway via two pastoral stations (Burta and Wonga), which are proposed to accommodate the mine (Mining Lease Application [MLA] 460). These properties have been identified as Western Land Leases (WLLs):

- Burta Station (WLL 3136 & 3239), is a perpetual WLL for the purpose of 'Grazing', tenanted by Ricky Todd Jones; and
- Wonga Station (WLL 3240 & 3241), is a perpetual WLL for the purpose of 'Grazing', tenanted by David Seth Cooper.

The department notes the location of Sunnydale Station, Pine Creek Station and Enmore Station located between the proposed mine site and the Silver City Highway. The proponent will need to determine whether legal access to the MLA exists across these properties. If legal access does not exist, the department and property owners are to be consulted with.

Crown land licences

A Crown land licence (issued under the *Crown Lands Management Act 2016*) may be required by the department to authorise activities and associated infrastructure over the affected land tenures (WLLs 3136, 3239, 3240 & 3241). A licence may be required for any or all of the following:

1) Electricity transmission line from the MLA to the existing 220 kV network along Sliver City Highway, including supporting telecommunications infrastructure;
2) Slurry pipeline corridor, but only where the pipeline traverse outside of the MLA. The proponent should consider the road access from Broken Hill to co-locate the pipeline route to minimise impacts;
3) Infrastructure not located within the MLA, such as temporary accommodation (mining camp), onsite sewerage treatment, offices, workshops, and other hardstand areas;
4) Sewerage pipelines from mine buildings within the MLA and mine accommodation, but only where the pipeline traverses outside of the MLA boundary; and
5) Water supply pipeline corridor from the nominated bore field to the MLA and other infrastructure, but only where the pipeline traverse outside of the MLA.

Easements

As outlined in Section 5.6.3 (Page 24) of the Scoping Report, electricity for the project would be drawn from the Mildura – Broken Hill 220 kV single circuit transmission line that runs parallel to the Silver City Highway to the east of the proposed mine. Section 5.4.2 (Page 18) notes that the mine's connection to the existing 220kV transmission line would involve construction of a substation and associated infrastructure at the mine site. The department notes that standby generators are proposed to be installed onsite to augment the network power supply and provide emergency contingency backup.

TransGrid will be the asset owner and responsible for the construction and maintenance of the transmission line, with Essential Energy to be the electricity provider. These entities will require registration of an easement to protect their rights and access to the infrastructure, as currently TransGrid do not hold any interest in the subject lands.

Easements will likely also be required to authorise legal access to the MLA, the proposed slurry pipeline from the mine north to the rail loading site, and the proposed water supply pipeline in the southeast to the proposed bore field site.

Easements can take up to 12 months to complete the required survey and registration. If early acquisition and use of the proposed occupied lands is required; the proponent may apply for a Crown lands licence over the affected area(s). Once the easement is registered, the licence would then be terminated.

It is a departmental requirement that any and all easements (or respective licence) must be obtained prior to any activity occurring. This process should be fully outlined in the Environmental Impact Statement (EIS) document.

Crown land review

The department has made its review and notes that many of the environmental criteria and issues considered in relation to proposed activities on Crown land have been satisfactorily addressed in the Scoping Report (prepared by GHD, March 2017).

Operation processes

In regards to the mine operation methods in the Scoping Report, the department is satisfied with the extraction methods proposed (drill and blast techniques and extraction using traditional truck and shovel mining equipment).

Post Mining Land use and Site rehabilitation

The department notes that the decommissioning of the site will be consistent with an approved Mine Closure and Rehabilitation Plan, and progressive rehabilitation will occur over the life of site operations to help minimise the disturbance footprint. Post-mining land use and proposed rehabilitation works must be undertaken in consultation with all relevant stakeholders, including the WLL holders of Burta and Wonga and the department.

Section 8.9.1 (Page 51 – 52) of the Scoping Report states that mine wastes (construction waste, staff generated waste, operations waste, mine wastes, decommissioning and rehabilitation) will need to be assessed for the potential impacts on the environment, including an assessment to determine the risk of acid, neutral and/or saline drainage material from the mined material and operational processes. The EIS should also detail potential mitigation of environmental impacts resulting from the waste production of the mine site.

Travelling Stock Reserve

Travelling Stock Reserve (TSR) 10085 (Gazetted on 30 November 1889) traverses the western and southern boundary of Burta Station and a small portion in the southwest corner of Wonga Station. The proposed MLA (Figure 1, Page 3) is likely to encroach upon the TSR, in which case, the proponent will need to consult and negotiate with the relevant Local Land Services (LLS) regarding the proposed mine activities on the TSR.

Construction materials

The Scoping Report does not go into details about the type, amount and source of materials required for the construction of the mine site infrastructure (including access roads, product storage areas, storage and buildings). The EIS should provide this detail. Where sand, gravel and other extractive material are proposed to be taken from Crown land outside of the MLA, these sites will be required to be held under a Crown land licence.

Groundwater

The department notes that, according to Section 1.4.3 (Page 4 – 5) of the Scoping Report, onsite ore processing plant will require up 40 gigalitres of water per annum for processing. The water is proposed to be sourced from an aquifer and bore field approximately 90km to the south of the mine site. It is proposed that the raw water will be distributed either to the ore processing plant or to the water treatment system which is likely to be a reverse osmosis desalination plant. It is the department's preferences that the treated water is used for final product washing, slurry transport and potable water (as per Section 5.6.2, Page 23). Ideally, raw water should have limited use on site to avoid salinity issues.

The department suggests that assessment and monitoring of the electrical conductivity of the groundwater is needed to provide information and data on potential salinity threats, especially where water may be used for dust suppression and other surface activities.

Overburden stockpiles

Consideration should be given in the EIS to the weight and method of stockpiling (overburden or waste rock) and whether this will cause harmful environmental impacts to the subsoils. Additionally, potential contamination of surrounding land by runoff of soils and water from the stockpiles will need to be further investigated.

Topsoil stockpiles

All topsoil stockpiles should be appropriately placed and maintained to ensure long-term use of the soil is achieved. Stockpiles should be sown with locally endemic native plant species and should not be stored in an area that may be exposed to potentially contaminated soils/materials.

Tailings Storage Facility (TSF)

Section 5.5.2 (Page 20-21) of the Scoping Report outlines the options that are being considered for construction of the TSF areas, and states that the TSF type to be used would be determined as the engineering design is refined through a feasibility study. These findings should be presented in the EIS. Soil permeability and associated environmental risks will also need to be addressed in the EIS, including mitigation methods.

Dust

Section 8.7.2 (Page 49) lists activities that would likely have a negative impact on air quality, including dust generation. Should dust suppression be needed throughout the site preparation, construction and operational phase of the mine, the proponents will need to ensure that the water used will not lead to dryland salinization. This includes where the bore water is used for dust suppression of access tracks, mine site, hardstand areas and vegetated areas etc.

Native vegetation offsets

As indicated in Section 5.9.1 (Page 26), the EIS will include a strategy to offset impacts on vegetation and the amount of vegetation to be removed will be quantified during the preparation of the EIS. The proponent will need to consult with the department with respect to the proposed biodiversity offset strategy as this will likely need the department's concurrence before seeking approval under the *Biodiversity Conservation Act 2016*.

If you have any further queries in regards to this matter, please do not hesitate to contact myself on (02) 6883 3356 or via email pip.sokol@crownland.nsw.gov.au.

Yours sincerely

Philippa Sokol
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Crown Lands - Far West Area

13 November 2019