



Our ref: DOC20/1023388

Your ref: SSD-9505

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Dear Mandana

McPhillamys Gold Project (Mine Site and Water Supply Pipeline) – Additional Information

Thank you for your email dated 10 December 2020 to the Biodiversity, Conservation and Science Directorate (BCS) inviting comments on the additional information provided in response to our review of the Submissions Report and Amendment Report for the McPhillamys Gold Project.

BCS have reviewed the following documents and updated data against our comments provided to you on 13 October 2020 (DOC20/744477).

- *McPhillamys Gold Project Response to government agency advice on Amendment Report and Submissions Report*
- Updated BAM calculator (submitted by EMM)
- Updated plot data sheets (submitted by EMM)
- Updated GIS spatial files (submitted by EMM)

BCS requires additional information to be able to complete its review and provide final advice. BCS also notes that in the additional information the proponent is now intending to stage the development of the project. If the impact to biodiversity is to be staged, this must be reflected in the BDAR and BAM calculator, and the project consent should the project be approved. Our detailed comments from the review of the documents above are provided in **Attachment A**.

If you require any further information regarding this matter, please contact Michelle Howarth, A/Senior Team Leader Planning North West, via michelle.howarth@environment.nsw.gov.au or (02) 6883 5339.

Yours sincerely

A handwritten signature in black ink, appearing to read 'M Howarth'.

Michelle Howarth
A/Senior Team Leader Planning North West
Biodiversity, Conservation and Science Directorate

21 December 2020



BCS's Comments

McPhillamys Gold Project – Response to government agency advice on Amendment Report and Submissions Report

BCS Comments on Response to Submissions and Amendment Reports (provided to P&A Group on 13 October 2020)	Response to BCS comments provided in Response to government agency advice on Amendment Report and Submissions Report (dated November 2020)	BCS Comments
<i>The following comments apply to both the Mine Site and the Water Supply Pipeline assessment.</i>		
<u>Issue 1</u> There are inconsistencies between the field data sheets and the data entered into the BAM calculator <u>Recommendation</u> 1.1. Ensure that the correct data set is entered into the BAM calculator for all plots and that it reflects the data in the BDAR.	Comments addressed in section 2.3.1 of the <i>Response to government agency advice on Amendment Report and Submissions Report (dated November 2020)</i>	<u>Mine Site</u> A number of inconsistencies remain between the field data sheets and the data in the BAM-C for the following plots: 1035, 1244, 1031, 1032, 1643, 1642, 1248, 1245 and 1241. <u>Pipeline</u> A number of inconsistencies remain between the field data sheets and the data in the BAM-C. BCS have reviewed a sample of the plot data sheets against the calculator and have identified inconsistencies. BCS is happy

		to discuss this issue with the accredited assessor.
<i>The following comments apply to the Water Supply Pipeline assessment only.</i>		
<u>Issue 2</u> Changes to offset calculations post consent <u>Recommendation</u> 2.1. The proponent should note that the final credit obligation included in the consent must be satisfied prior to commencing any on-ground works that impact on biodiversity values.	Comments addressed in section 2.3.2 of the <i>Response to government agency advice on Amendment Report and Submissions Report</i> (dated November 2020)	BCS understands that it is the proponent's intention to stage the construction of the project, and therefore stage the retirement of the biodiversity credits. This means the total credit obligation does not need to be retired when the project commences. BCS notes that the proponent intends to submit a staged offset delivery strategy. The offset delivery strategy must clearly identify the stages that the project will be divided into, with information including; <ul style="list-style-type: none"> • Stage name/identifier • Diagram of physical location of the stage including plant community type (PCT mapping, PCT zones and species polygons) • Area (hectares) to be impacted • Ecosystem credits (per PCT) and species credits.
<u>Issue 3</u> Removal of ecosystem credit species from the predicted list must be consistent with the assessment requirements of the BAM. <u>Recommendation</u> 3.1. The accredited assessor should note the correct process for removing ecosystem species from the predicted list and implement when doing assessments in the future.	Comments addressed in section 2.3.3 of the <i>Response to government agency advice on Amendment Report and Submissions Report</i> (dated November 2020)	No further action required.

<p>Issue 4 VI scores for some vegetation zones may not be representative</p> <p>Recommendations</p> <p>4.1 All plots across all vegetation zones should be checked in the calculator to ensure all data has been entered accurately.</p> <p>4.2 Where plots are not representative of the vegetation zone the assessor should consider whether duplicating of plots would give a more representative VI score.</p>	<p>Comments addressed in section 2.3.4 of the <i>Response to government agency advice on Amendment Report and Submissions Report</i> (dated November 2020)</p>	<p>No further action required.</p>
<p>Issue 5 There are inconsistencies in species credit numbers between the BDAR and the calculator</p> <p>Recommendation</p> <p>5.1. Review table 6.11 of the BDAR and ensure that the data presented in the BDAR and the data in the calculator are consistent.</p>	<p>Comments addressed in section 2.3.5 of the <i>Response to government agency advice on Amendment Report and Submissions Report</i> (dated November 2020)</p>	<p>No further action required.</p>
<p>Issue 6 There are inconsistencies between the GIS spatial layers and the BDAR for species polygons</p> <p>Recommendation</p> <p>6.1. Determine the correct sizes of the polygons for each species and ensure the correct data is presented in the BDAR and calculator.</p>	<p>Comments addressed in section 2.3.6 of the <i>Response to government agency advice on Amendment Report and Submissions Report</i> (dated November 2020)</p>	<p>No further action required.</p>