

9 November 2022

Mandana Mazaheri  
Principal Planning Officer Energy, Resources and Industry Assessments  
Department of Planning and Environment  
4 Parramatta Square, 12 Darcy Street  
Paramatta NSW 2150

**Re: McPhillamys Gold Project - Response to Request for Information (RFI-49618207)**

Dear Mandana,

This letter provides responses to the Department of Planning and Environment (DPE)'s request for additional information (RFI) in relation to the McPhillamys Gold Project (the project) (DPE reference RFI-49618207).

The matter raised in DPE's RFI is reproduced verbatim below. The applicant's response to the matter is provided directly below.

*The Department requires that you provide further information regarding the proposed land-based biodiversity offsets to demonstrate that there would be reasonable prospect of retiring credits through land-based offset, including a map (or maps) showing location(s), PCTs and credits (even if the information is preliminary) or if it would be through purchasing off the market.*

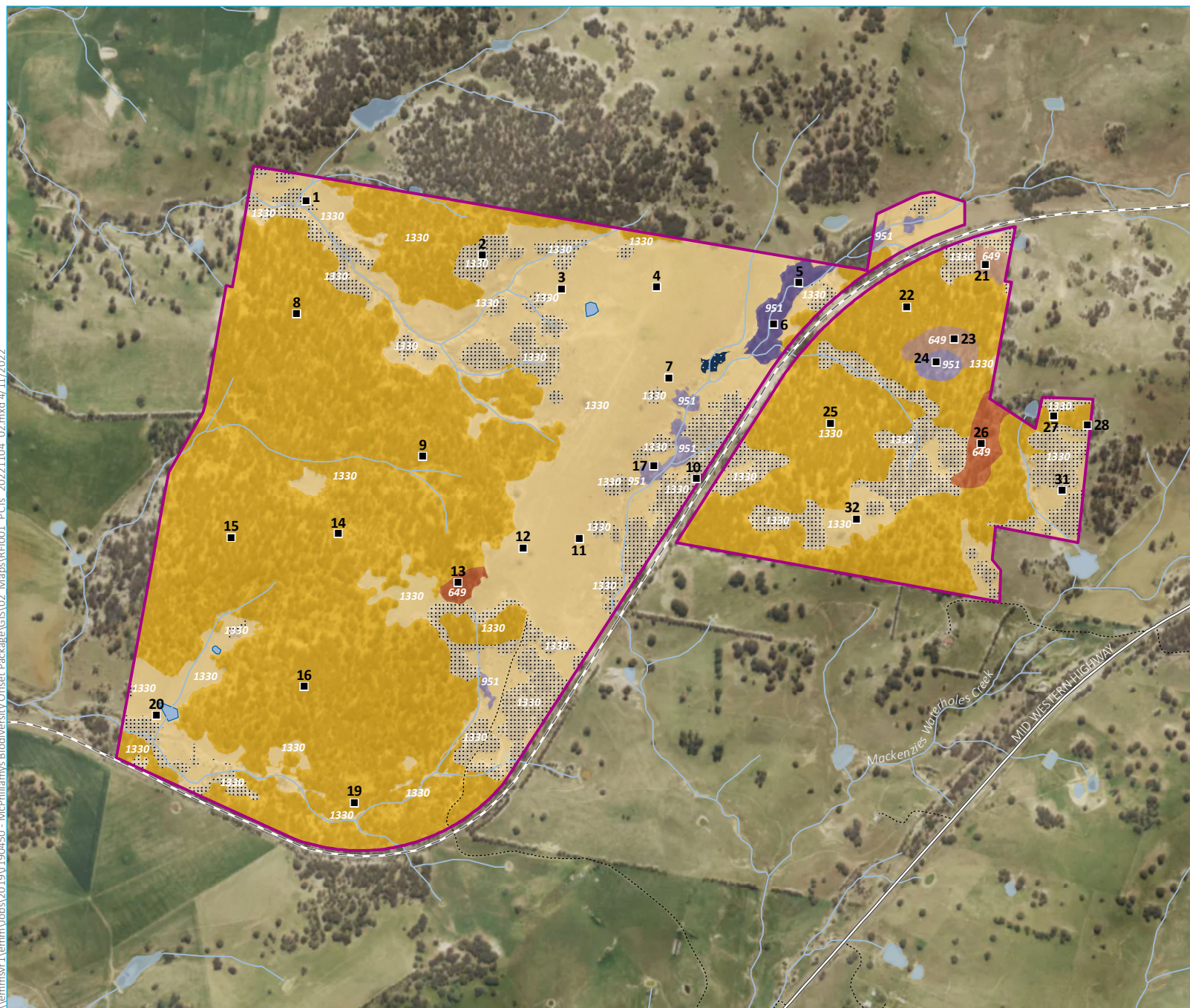
#### Proposed land-based offset

The proposed Aziel Biodiversity Stewardship Site is approximately 384 hectares (ha) in size and is located approximately 9 kilometres (km) south-west of Blayney, NSW.

The site is located between Blayney Golf Club to the east and Browns Creek Gold Mine to the north-west. The vegetation within the subject land is primarily native, with a good cover of canopy species throughout the site, in addition to smaller areas of derived native grassland.

The Biodiversity Stewardship Agreement (BSA) is currently in preparation, with vegetation mapping and indicative site boundary shown in Figure 1.

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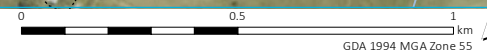
- KEY**
- Indicative stewardship site boundary
  - Rail line
  - Major road
  - Vehicular track
  - Watercourse/drainage line
  - Waterbody
  - Plot location
  - Dam
  - Exotic
  - Plant community type
  - PCT 649 | Apple Box - Broad-leaved  
Peppermint dry open forest of the South  
Eastern Highlands Bioregion
  - High
  - Medium
  - PCT 951 | Mountain Gum - Manna Gum  
open forest of the South Eastern  
Highlands Bioregion
  - High
  - Medium
  - PCT 1330 | Yellow Box - Blakely's Red Gum  
grassy woodland on the tablelands, South  
Eastern Highlands Bioregion
  - High
  - Derived native grassland
  - Regeneration

Proposed biodiversity stewardship  
site PCT mapping

J180395 Regis McPhillamys Gold Project  
AR2 BDAR - RFI-49618207  
Figure 1



Source: EMM (2022); MetroMap (2022); DFSI (2017); DPI (2015); GA (2011)



A summary of the ecosystem credits created for all vegetation zones within the proposed Aziel Biodiversity Stewardship Site is provided in Table 1.

**Table 1** Ecosystem credits (PCTs)

PCT number	PCT name	Vegetation zone	Area (ha)	Credits
649	Apple Box - Broad-leaved Peppermint dry open forest of the South Eastern Highlands Bioregion	649 – High	3.60	8
		649 - Medium	2.73	9
951	Mountain Gum - Manna Gum open forest of the South Eastern Highlands Bioregion	951 – High	2.95	13
		951 - Medium	3.44	17
1330	Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion	1330 – High	219.75	1376
		1330 - Regen	48.39	185
		1330 – DNG	103.25	172
TOTAL			384.11	1,780

Targeted surveys within the proposed Aziel Biodiversity Stewardship Site determined that the Koala (*Phascolarctos cinereus*) is present. A summary of the species credits created for all vegetation zones within the site is provided in Table 2.

**Table 2** Species credits (Koala)

PCT number	PCT name	Vegetation zone	Area (ha)	Credits
649	Apple Box - Broad-leaved Peppermint dry open forest of the South Eastern Highlands Bioregion	649 – High	3.60	8
		649 - Medium	2.73	9
951	Mountain Gum - Manna Gum open forest of the South Eastern Highlands Bioregion	951 – High	2.95	13
		951 - Medium	3.44	17
1330	Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion	1330 – High	219.75	1376
		1330 - Regen	48.39	185
		1330 – DNG	103.25	172
TOTAL			384.11	1,780

### Residual credits

The remaining (residual) ecosystem credits for the project, not met by the proposed stewardship site, are provided in Table 3 with remaining (residual) species credits, not met by the proposed offset site, provided in Table 4.

**Table 3**      **Residual ecosystem credits (PCTs)**

PCT number	PCT name	Vegetation zone (offset site)	Credits at offset site	Credits required (mine)	Credit required (pipeline - north)	Credits required (mine + pipeline)	Residual credits required
649	Apple Box - Broad-leaved Peppermint dry open forest of the South Eastern Highlands Bioregion	649 – High	8	0	0	0	0 (17 excess from offset site)
		649 - Medium	9				
951	Mountain Gum - Manna Gum open forest of the South Eastern Highlands Bioregion	951 – High	13	465	0	435	435
		951 - Medium	17				
1330	Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion	1330 – High	1,376	1,370	158	1,528	0 (205 excess from offset site)
		1330 - Regen	185				
		1330 – DNG	172				
727	Broad-leaved Peppermint – Brittle Gum – Red Stringybark dry open forest of the South Eastern Highlands Bioregion	-	-	952	2	954	954
766	Carex sedgeland of the slopes and tablelands	-	-	26	0	26	26
277	Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion	-	-	0	53	53	53
1093	Red Stringybark - Brittle Gum - Inland Scribbly Gum dry open forest of the tablelands; South Eastern Highlands Bioregion	-	-	0	97	97	97
1191	Snow Gum - Candle Bark woodland on broad valley flats of the tablelands and slopes, South Eastern Highlands Bioregion	-	-	0	75	75	75
1197	Snow Gum - Mountain Gum tussock grass-herb forest of the South Eastern Highlands Bioregion	-	-	0	53	53	53
<b>TOTAL</b>			<b>1,780</b>	<b>2,813</b>	<b>438</b>	<b>3,251</b>	<b>1,693</b>

**Table 4**      **Residual species credits**

Species	Credits at offset site	Credits required (mine)	Credit required (pipeline - north)	Credits required (mine + pipeline)	Residual credits required
Squirrel Glider	0	2,648	156	2,804	2,804
Koala	1,780	2,428	162	2,590	810
Key's Matchstick Grasshopper	0	1,096	171	1,267	1,267
Brush-tailed Phascogale	0	0	81	81	81
Pink-tailed Worm Lizard	0	0	5	5	5
Barking Owl	0	0	7	7	7
Powerful Owl	0	0	35	35	35
Silky Swainson-pea	0	0	76	76	76
Aromatic Peppercreess	0	0	4	4	4
Austral Toadflax	0	0	31	31	31
Large-eared Pied Bat	0	0	10	10	10
Yellow-spotted Tree Frog	0	0	1	1	1
Brush-tailed Rock Wallaby	0	0	9	9	9
Gang-gang Cockatoo	0	0	13	13	13
Eastern Pygmy Possum	0	0	142	142	142
Bathurst Copper Butterfly	0	0	14	14	14
Masked Owl	0	0	27	27	27
Veronica blakelyi	0	0	38	38	38
Black Gum	0	0	4	4	4
Booroolong Frog	0	0	9	9	9

**Table 4**      **Residual species credits**

Species	Credits at offset site	Credits required (mine)	Credit required (pipeline - north)	Credits required (mine + pipeline)	Residual credits required
Clandulla Geebung	0	0	4	4	4
<b>TOTAL</b>	<b>1,780</b>	<b>6,172</b>	<b>999</b>	<b>7,171</b>	<b>5,391</b>



The residual credit requirement will be met by either:

- purchasing 'like for like' credits in the market, or
- paying into the Biodiversity Conservation Fund (BCF). The Biodiversity Conservation Trust is then responsible for identifying and securing the credit obligation.

An analysis of the credits supply register (1 November 2022) against the 'like-for-like' retirement options for the residual ecosystem credit requirements has been undertaken, with results provided in Table 5.

**Table 5** Like for like retirement options available from the market

PCT number	PCT name	Credits at offset site	Credits required (project)	Residual credits required	Credits available on the market
<b>Mine site</b>					
951	Mountain Gum - Manna Gum open forest of the South Eastern Highlands Bioregion	30	465	435	Not available
1330	Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion	1,733	1,370	0	Delivered by offset site.
727	Broad-leaved Peppermint – Brittle Gum – Red Stringybark dry open forest of the South Eastern Highlands Bioregion	-	952	952	3,244 credits available
766	Carex sedgeland of the slopes and tablelands	-	26	26	Not available
<b>Pipeline (orange)</b>					
277	Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion	-	48	48	17,590 credits available
1093	Red Stringybark - Brittle Gum - Inland Scribbly Gum dry open forest of the tablelands; South Eastern Highlands Bioregion	-	1	1	3,244 credits available
<b>Pipeline (Bathurst)</b>					
277	Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion		5	5	15,241 credits available
1330	Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion	1,733	139	0	Delivered by offset site.

**Table 5** Like for like retirement options available from the market

PCT number	PCT name	Credits at offset site	Credits required (project)	Residual credits required	Credits available on the market
<b>Pipeline (Hill End)</b>					
727	Broad-leaved Peppermint – Brittle Gum – Red Stringybark dry open forest of the South Eastern Highlands Bioregion	-	2	2	3,244 credits available
1093	Red Stringybark - Brittle Gum - Inland Scribbly Gum dry open forest of the tablelands; South Eastern Highlands Bioregion	-	14	14	3,244 credits available
1191	Snow Gum - Candle Bark woodland on broad valley flats of the tablelands and slopes, South Eastern Highlands Bioregion	-	7	7	Not available
1197	Snow Gum - Mountain Gum tussock grass-herb forest of the South Eastern Highlands Bioregion	-	53	53	Not available
1330	Yellow Box - Blakely's Red Gum grassy woodland on the tablelands, South Eastern Highlands Bioregion	1,733	19	0	Delivered by offset site.
<b>Pipeline (Capertee)</b>					
1093	Red Stringybark - Brittle Gum - Inland Scribbly Gum dry open forest of the tablelands; South Eastern Highlands Bioregion	-	82	82	2,172 credits available
1191	Snow Gum - Candle Bark woodland on broad valley flats of the tablelands and slopes, South Eastern Highlands Bioregion	-	68	68	Not available
<b>TOTAL</b>		<b>1,763</b>	<b>3,251</b>	<b>1,693</b>	<b>-</b>

As shown within Table 6, of the 1,693 residual credits, 1,104 are available from the market, with 589 credits (comprising PCTs 951, 766, 1191 and 1197) not available.



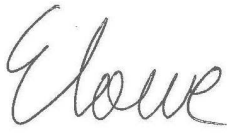
An analysis of the credits supply register (1 November 2022) against the residual species credit requirements has been undertaken, with results provided in Table 6.

**Table 6** Available 'like-for-like' species credits on the market

Species	Credits at offset site	Credits required (mine)	Credit required (pipeline - north)	Credits required (mine + pipeline)	Residual credits required	Credits available on the market
Squirrel Glider	0	2,648	156	2,804	2,804	>15,000 credits available
Koala	1,780	2,428	162	2,590	810	>30,000 credits available
Key's Matchstick Grasshopper	0	1,096	171	1,267	1,267	Not available
Brush-tailed Phascogale	0	0	81	81	81	>5,000 credits available
Pink-tailed Worm Lizard	0	0	5	5	5	>200 credits available
Barking Owl	0	0	7	7	7	Not available
Powerful Owl	0	0	35	35	35	Not available
Silky Swainson-pea	0	0	76	76	76	Not available
Aromatic Peppergrass	0	0	4	4	4	Not available
Austral Toadflax	0	0	31	31	31	Not available
Large-eared Pied Bat	0	0	10	10	10	>4,000 credits available
Yellow-spotted Tree Frog	0	0	1	1	1	Not available
Brush-tailed Rock Wallaby	0	0	9	9	9	Not available
Gang-gang Cockatoo	0	0	13	13	13	280 credits available
Eastern Pygmy Possum	0	0	142	142	142	9 credits available
Bathurst Copper Butterfly	0	0	14	14	14	Not available
Masked Owl	0	0	27	27	27	Not available
Veronica blakelyi	0	0	38	38	38	Not available
Black Gum	0	0	4	4	4	Not available
Booroolong Frog	0	0	9	9	9	Not available
Clandulla Geebung	0	0	4	4	4	Not available
<b>TOTAL</b>	<b>1,780</b>	<b>6,172</b>	<b>999</b>	<b>7,171</b>	<b>5,391</b>	<b>-</b>

It is Regis' intention to pay into the BCF, for those credits that are not available from the market.

Yours sincerely,

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

**Erin Lowe**

Associate Ecologist

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