

# **McPhillamys Gold Project Social Impact Assessment**

## **Minor RFI dated 2021-08-24**

### **Impacts due to displacement associated with the voluntary acquisition of properties in Kings Plains**

Regis has advised the Department that it has progressed negotiated agreements with 17 of the affected landowners in Kings Plains which includes an option for the landowner to voluntarily request that Regis purchase their property at any time within 10 years from the date when the board of directors makes its final decision to proceed with the project.

The consequences of this acquisition and subsequent relocation of residents from the area may cause negative social impacts on the remaining community of Kings Plains which require adaptive management.

Please provide some consideration of these impacts and discuss measures that Regis would consider implementing if required to mitigate these impacts.

The Department understands that Regis has engaged the services of Gary West to assist with its discussions with these landowners. Can Regis describe the progress of these discussions, the steps taken and provide information (that can be made publicly available) to demonstrate how these discussions have been transparent, fair and reasonable.

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### **Cultural Impacts**

The SIA and Addendum SIA identified potential impacts on the Kings Plains residents deriving from loss of culture, sense of place and rural way of life due to the project. These include the changing landscape and the changing land use from rural to industrial.

The social impacts of this change include:

- a reduction in aesthetic, cultural, spiritual and recreational value deriving from ecosystem loss
- Loss of aboriginal cultural heritage
- Loss of sense of place
- Loss of the rural way of life

The SIA and SIA Addendum Reports do not propose specific mitigation measures relating to cultural loss other than to “manage impacts to amenity; undertake progressive rehabilitation; support the participation of near neighbours in aspects of rehabilitation and mine closure planning, etc.” (6.3.3 on p.167 of the SIA)

Provide further detail about how proposed measures not discussed in the SIA address these issues and/or consider what additional mitigation measures can be implemented to manage impacts on cultural values, the rural way of life and sense of place for the community as a result of the project.

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### **Impacts of Stress and Anxiety**

The local community has expressed concerns about the impacts of noise, dust and light from the mine even once operations and monitoring has commenced. It has also raised concerns about an erosion of community cohesion, anti-social behaviour.

Page 60 of the RtS Appendix E: Health Impact Assessment states:

*“Increased levels of stress and anxiety, both short-term acute events and chronic events/impacts are well recognised to affect health and wellbeing. Individuals experience a wide range of complex factors and issues [which] influence health and wellbeing, specifically mental health. In addition, individuals respond to changes in stress and anxiety in different ways and hence it is not possible to quantify how the project would affect stress and anxiety in the community.”*

In the SIA and section 5.5.4 of the RtS, Regis proposes to manage resident stress and anxiety in relation to the project by implementing the Stakeholder Engagement Framework, which includes engaging and maintaining “transparent, evidence based and ongoing dialogue with concerned property owners and other community members”.

Consider further measures about when to engage / empower the community to build trust and reduce stress and outrage and how to verify the effectiveness of these measures.

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### **Local Services**

The SIA identified the potential impacts on local services due to an increased construction workforce and reduced availability of these services for the community. These impacts include:

- Police - “a noticeable gap in service provision” p.D-19 Table 10 of the SIA.
- “There is a risk of limited health service access and potential for poorer health outcomes in Blayney if there is a significant increase in permanent population and in the instance where the medical service is not able to increase capacity” p.D-19 Table 10 of the SIA.
- “increased demand and limited capacity for identified vulnerable groups within the social housing, medical and aged care sectors” p.D-21 Table 11 of the SIA.

The SIA also notes the local social support services and community groups however does not indicate the availability of services relating to issues such as domestic violence, gambling and womens shelters.

Please provide some discussion of how Regis propose to support the provision of local services to help address the concerns identified in the SIA and those not considered (such as domestic violence, gambling and womens shelters).

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### **Anti-social behaviour**

Concerns were raised about the potential impacts of an influx in mostly male population and issues around anti-social behaviour.

The SIA proposes a suite of measures to addressing the potential for antisocial behaviour. Please advise how Regis proposes to monitor the effectiveness of these measures and respond to instances of antisocial behaviour.

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### **Hazard and Risk**

The Department notes that the preliminary hazard analysis concludes that the project does not represent an offensive or hazardous development and ranks the transport and storage of hazardous materials as a medium risk, particularly the risk of a vehicle accident.

The PHA notes that the “transport of hazardous goods to the mine site, while posing a conceivable issue for off site members of the public, is expected to be adequately addressed through strict conformance with the Australian Code for the transport of Dangerous Goods.

The Health Impact Assessment (RTS Appendix E) states under Hazardous Materials p.ES1 that “there are no impacts in the off-site community. This includes the transport, storage and use of a range of dangerous goods, including explosives, cyanide and LPG. Where there are no impacts there are no risks to community health.”

Given the potential for off site impacts does exist, this statement is not strictly correct and therefore requires further clarification.

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### **Distributive equity**

Section 4.3.3 (p.52) of the SIA notes that “For some near neighbours there is a sense that the local community is disproportionately carrying the costs of mining and is disadvantaged simply because it is at the centre of the impact”.

Section 6.2.12 of the SIA discusses distributional and intergenerational equity and notes that the impacts and opportunities of the project may accrue disproportionately throughout the local community.

The SIA and Addendum SIA provides no clear discussion about this issue nor do the reports recommend measures with the exception of the VPA to support local community.

Please provide discussion about the proposed measures to address potential distributive inequity, and/or provide further measures to address this issue.

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### **Accommodation**

The SIA has identified the potential accommodation shortages in the Blayney LGA to meet demands of the project and potential impacts which include:

- increased demand for short term accommodation by the construction workforce, which presents challenges for competing local industry and businesses
- workforce accommodation demands reducing accessibility and affordability to private housing for existing and future residents
- increased pressure upon local services, facilities and infrastructure
- displacing lower income households and loss of social diversity

The SIA and SIA Addendum includes the proposed Workforce Accommodation Management Framework which includes objectives to address some of these issues. However further detail is required about the proposed performance criteria from Regis against which the implementation of this strategy can be assessed.

Please also provide further discussion about strategies Regis is considering to address the potential issue of insufficient accommodation for workers.

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### **Local Labour Draw**

The SIA (p.22) notes that approximately 60% (367 workers) of the total construction workforce for the mine development and 20% (24%) of the pipeline construction workforce is anticipated to be local hires, which may result in labour draw from existing local employers.

Please clarify the statement made in the SIA (s 6.2.9) that Regis will “monitor local labour supply and adjust local labour recruitment practices and rates accordingly.”

14 September 2021

Mr Stephen O'Donoghue  
Director – Resource Assessments  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**Re: McPhillamys Gold Project (SSD 9505) – Response to minor RFI dated 24-08-2021**

Dear Steve,

This letter provides a response to the request for information (RFI) from the NSW Department of Planning, Industry and Environment (DPIE), dated 24 August 2021, in relation to the Social Impact Assessment (SIA) of the McPhillamys Gold Project (the project). Each request is reproduced in the box and a response provided below.

**1. Impacts due to displacement associated with the voluntary acquisition of properties in Kings Plains**

Regis has advised the Department that it has progressed negotiated agreements with 17 of the affected landowners in Kings Plains, which includes an option for the landowner to voluntarily request that Regis purchase their property at any time within 10 years from the date when the board of directors makes its final decision to proceed with the project. The consequences of this acquisition and subsequent relocation of residents from the area may cause negative social impacts on the remaining community of Kings Plains which require adaptive management. Please provide some consideration of these impacts and discuss measures that Regis would consider implementing if required to mitigate these impacts.
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Firstly, as described in the Submissions Report (EMM 2020a), it is noted that the noise and air quality models developed for the project do not predict any properties will experience noise or dust levels that trigger the requirement for acquisition set out in the *Voluntary Land Acquisition and Mitigation Policy* (VLAMP) (NSW Government 2018). In fact, the levels are well below. Predicted noise and dust levels are also below the triggers in the VLAMP for mitigation requirements at all privately owned properties. The Submissions Report reported that one property (R28a), was predicted to experience levels of up to 3 decibels (dB) above the relevant noise criteria for a short period in Year 1 of the project, triggering the application of voluntary mitigation rights for that property. Since completion of the Submissions Report, Regis has negotiated and signed a landholder agreement with the owner of this property.

Notwithstanding the fact that predicted levels are below the triggers for mitigation and acquisition rights specified in the VLAMP, to effectively mitigate residual air, noise and visual amenity impacts and minimise the risk of outmigration of residents from Kings Plains, Regis has committed to, and is in the process of, negotiating agreements with landholders in Kings Plains, which include tailored landscape and mitigation plans for their individual properties.

As described in the Submissions Report (EMM 2020a), 20 agreements are being progressed, and Regis has continued to progress these agreements with landholders since the lodgement of the Submissions Report in September 2020. At the time of writing this response, a total of 18

agreements have now been provided to landholders, which include tailored landscape plans where the landholder has requested such plans. Regis worked collaboratively with the landholders on these plans. Regis is also working on issuing the final two agreements as soon as possible.

As noted by DPIE, Regis is also going a step further in the negotiation of these agreements by including a clause in the majority (i.e. 18 of the 20 agreements) that states landowners may request Regis purchase their property at any time within ten years from the date that development consent is granted (provided the consent remains in force), and the Regis Board approves the project.

While the negotiated agreements contain an acquisition clause, a key focus of the agreements are the property specific-management and mitigation plans developed in agreement with individual landowners. The purpose of the mitigation plans is to implement effective measures to mitigate residual air quality, noise and visual impacts of the project, specific to each individual property, such that the impacts are mitigated to an acceptable level, with the ultimate outcome of residents staying in Kings Plains. As described in the SIA (Hansen Bailey 2019), to further minimise the risk of outmigration from Kings Plains, Regis is also committed to demonstrating to the community an ability to develop the mine and comply with all regulatory requirements.

If a property owner were to take up the acquisition offer and sell their property to Regis, Regis will seek to make the property available for rent to existing residents in the Blayney local government area (LGA) and the incoming workforce, as is the case with the other properties owned by Regis. Therefore, acquisition would not likely result in a population change in Kings Plains.

The Department understands that Regis has engaged the services of Gary West to assist with its discussions with these landowners. Can Regis describe the progress of these discussions, the steps taken and provide information (that can be made publicly available) to demonstrate how these discussions have been transparent, fair and reasonable.
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A number of residents in Kings Plains have engaged the services of Mr Warwick Gibblin of OzEnvironmental to act on their behalf in the process of negotiating agreements with Regis. Regis subsequently engaged Mr Gary West to facilitate a meeting with Mr Gibblin and the group he represents. Mr Gibblin represents less than half of the landowners with which Regis are currently negotiating agreements. Negotiations are well progressed with the remaining landholders.

A meeting was planned to be held in Blayney between Mr Gibblin and Regis earlier this year. Mr West was to facilitate this meeting; however, Covid-19 restrictions at the time of the planned meeting prevented it from being held in person. Regis offered to hold the meeting by video conference, but Mr Gibblin declined the offer. The meeting has now been delayed until it can be held in person. Regardless, Regis is continuing to issue and negotiate agreements to all relevant landholders.

In relation to the process of developing the agreements and mitigation measures for each property, the measures have been divided into stage one and stage two. Once agreement is reached between Regis and a landholder, stage one measures are implemented, which primarily involve implementing vegetation screening plans developed in consultation with the landowner. Stage two measures will be implemented if development consent is granted for the project, and prior to mining operations commencing. In addition to the stage one and two measures, the agreements also include a commitment by Regis to contribute to the electricity costs associated with the operation of air conditioning or contribute to the installation of solar panels.

It is also noted that at the time of completing the Submissions Report (EMM 2020a), 15 of the 20 draft agreements included a voluntary acquisition clause. As a result of ongoing negotiation with landholders, 18 of the agreements now include this acquisition clause. Further, Regis has increased the timeframe for acquisition from that originally offered (5 years) to 10 years, following

discussions with landholders. This increase in the time period for which acquisition can be requested of Regis was requested by one landholder. To ensure transparency and equity for all landholders involved in negotiating agreements, the increased time period was added to all agreements by Regis. While some parts of the agreement are standardised, they have been tailored to individual circumstances.

Further, as described above, the implementation of agreements with an acquisition upon request clause is above and beyond what is required by government policy (ie VLAMP), demonstrating Regis's commitment to work collaboratively, fairly, and in accordance with best practice with the Kings Plains community.

## 2. Cultural impacts

The SIA and SIA Addendum Reports do not propose specific mitigation measures relating to cultural loss other than to “manage impacts to amenity; undertake progressive rehabilitation; support the participation of near neighbours in aspects of rehabilitation and mine closure planning, etc.” (6.3.3 on p.167 of the SIA). Provide further detail about how proposed measures not discussed in the SIA address these issues and/or consider what additional mitigation measures can be implemented to manage impacts on cultural values, the rural way of life and sense of place for the community as a result of the project.
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### Cultural values

As described in the Environmental Impact Statement (EIS) for the project (EMM 2019), land within the project area has been extensively modified by agricultural land uses including cropping and grazing, historical mining activities and construction of roads and utilities.

A number of Aboriginal heritage sites were identified within the mine project area, comprising small scatters or isolated finds of stone artefacts. The Aboriginal Cultural Heritage Assessments prepared for the project (Landskape 2019, Landskape 2020, OzArk 2019 and OzArk 2020) found that up to 30 Aboriginal heritage sites will be impacted by the mine development (27 directly impacted and three indirectly impacted), and a total of seven Aboriginal sites will be disturbed by the pipeline route if the northern alignment is constructed, and eight if the southern option is constructed.

Importantly, Landskape (2019) noted that although the sites in the project area are representative of a region wide distribution of Aboriginal occupation sites, they hold low scientific significance and are significantly disturbed, consistent with the historical agricultural land use of the area. Considering this, the mine development and subsequent impacts on identified sites will not cause cumulative impacts to the region's Aboriginal cultural heritage value.

Further, as reported in Section 7.1.2 of the Aboriginal Cultural Heritage Assessment (Landskape 2019), the RAPs did not identify any high spiritual, traditional, historical, or contemporary associations with the archaeological sites identified in the project area.

Notwithstanding, Regis has committed to a range of measures to effectively mitigate impacts to Aboriginal cultural heritage as a result of the project. All sites identified within the disturbance footprint of the project will be salvaged prior to land disturbance, in collaboration with the Registered Aboriginal Parties (RAPs). A keeping place for salvaged artefacts will be determined as part of the development of the Cultural Heritage Management Plan (CHMP) and in consultation with RAPs and Heritage NSW.

As described in Section 3.3.4 of the SIA Addendum prepared for the project (Hansen Bailey 2020, Appendix S of the Amendment Report (EMM 2020b)), Regis is committed to involving the local Aboriginal community as integral participants in the management of Aboriginal cultural heritage values in the mine project area. Regis will continue to involve the RAPs and other relevant Aboriginal community groups or members in matters pertaining to the mine development. Further to the management of specific sites, the following mitigation and management measures will

therefore be implemented to ensure the appropriate management of Aboriginal cultural heritage within the project area:

- invitation for the continued participation of RAPs; in particular for the recording, collection, curation, storage and replacement of artefacts;
- provision of cultural awareness training for site personnel, likely through the site induction process;
- the preparation of a CHMP, which will guide the mitigation and management of sites in the project area and help to avoid inadvertent impacts. The CHMP will also outline the protocol for unanticipated finds such as artefacts and skeletal remains; and
- Regis will consult with the Orange Local Aboriginal Land Council (OALC) regarding the commission of a social and cultural mapping study with relevant traditional owners for the project area.

Consultation has been ongoing with the RAPs and OALC regarding proposed mitigation and future management options relating to cultural heritage.

#### Rural way of life and sense of place

The SIA (Hansen Bailey 2019) acknowledged that the project has the potential to adversely impact rural values in the Kings Plains locality. The rural way of life in this area is characterised by the presence of rural vistas, livestock (cattle) grazing, outdoor activities including equine activities and close social connections between residents.

As all mining activity would be undertaken on land owned by Regis, there is no potential for the project to have direct impacts on rural farming practices. However, the EIS and SIA acknowledged that the project will alter rural vistas immediately adjacent to the mine development area in Kings Plains. Regis has therefore committed to a range of measures to reduce and mitigate this impact. Firstly, the project design has been carefully considered to manage the potential visual impacts of the project, including the following:

- the processing plant and mine infrastructure areas have been sited to maximise the separation of these project elements and sensitive receivers and to take advantage of existing topography that will screen these elements;
- the open cut pit and southern amenity bunds will be developed as a priority to screen development of open cut, infrastructure and haul roads at early stage of mine development;
- the waste rock emplacement staging will be refined to create progressive minor screening bunds;
- micro-topographic design will be incorporated into the final landform;
- property acquisition has been undertaken to provide a substantial buffer in some directions between the proposed mine infrastructure and nearby residences; and
- progressive rehabilitation will be undertaken throughout the mine life. At the end of mining, mine infrastructure will be decommissioned, and disturbed areas will be rehabilitated to integrate with natural landforms as far as practicable. The final landform, apart from the final void, will support land uses similar to current land uses or land uses consistent with land use strategies for the Blayney and Cabonne LGAs.

Secondly, as described above, residences in Kings Plains will receive residential landscape mitigation treatments to screen or mitigate views of the mine development. Regis are committed to, and are actively negotiating, agreements with landholders which include these tailored mitigation plans for residents.

Further, as described in the SIA (Hansen Bailey 2019), the project has the potential to benefit rural landowners in the region through the provision of employment opportunities as a supplement

to existing rural employment, and through service capacity improvements in the Kings Plains rural fire brigade and the Canobolas Zone rural fire service. Regis will also provide the opportunity for part-time employment at the mine. This will enable people who live on rural properties to combine employment off-farm with working on the land, facilitating a continuation of a rural way of life.

### 3. Impacts of stress and anxiety

<p>In the SIA and section 5.5.4 of the Submissions Report, Regis proposes to manage resident stress and anxiety in relation to the project by implementing the Stakeholder Engagement Framework, which includes engaging and maintaining “transparent, evidence based and ongoing dialogue with concerned property owners and other community members”. Consider further measures about when to engage / empower the community to build trust and reduce stress and outrage and how to verify the effectiveness of these measures.</p>
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As noted in the Department’s request for further information and described in the Submissions Report (EMM 2020a), the primary way in which Regis proposes to manage and reduce the potential for stress and anxiety in the community is for the company to actively engage with concerned property owners and other community members. The primary purpose of this engagement is to ensure community members remain informed about the project, thereby reducing uncertainty and the associated stress and anxiety. Regis engages with the community in a number of ways and is committed to continuing this engagement throughout all phases of the project, from construction to operation and rehabilitation and closure. Methods of engagement and communication include:

- Community consultative committee (CCC) – The CCC was established for the project in August 2018 and has facilitated opportunities for community participation in the project. The CCC generally meets every two to three months and minutes from these meetings are published on the project website (<https://www.mcphillamysgold.com/>). Regular meetings of the CCC have continued since the submission of the Amendment Report and Submissions Report, with the latest one held in August 2021.
- Community relations team – This team is available to discuss the project at the McPhillamys Gold Project office in Blayney. Regis opened their local office in Blayney in 2013, where Regis staff have remained available to discuss the project with the community.
- Landholder discussions – Discussions are ongoing with the 20 landowners in Kings Plains, with whom Regis is in the process of negotiating agreements. Regis has been actively engaging with landholders to develop tailored mitigation plans for their property.

The Stakeholder Engagement Framework for the project will be further developed as part of the Social Impact Management Plan. This framework will outline the tools and timing of engagement, to ensure that engagement is undertaken in such a way so as to build trust with the community.

The inclusion of the clause stating the landowners can request Regis purchase their property in the agreements with Kings Plains residents also primarily seeks to respond to the anxiety expressed by landowners in relation to the uncertainty about how future impacts may be experienced, particularly impacts to property values, and impacts to way of life and the use and enjoyment of their private property.

Regis also recently undertook a community sentiment survey across the Blayney LGA to gain an understanding of community views and concerns relating to the project. The results of the survey will be used to ensure the means and timing of engagement is tailored to address areas of concern or uncertainty.



#### 4. Local services

The SIA identified the potential impacts on local services due to an increased construction workforce and reduced availability of these services for the community. These impacts include:

- Police: “a noticeable gap in service provision” p. D-19 Table 10 of the SIA.
- “There is a risk of limited health service access and potential for poorer health outcomes in Blayney if there is a significant increase in permanent population and in the instance where the medical service is not able to increase capacity” p.D-19 Table 10 of the SIA.
- “increased demand and limited capacity for identified vulnerable groups within the social housing, medical and aged care sectors: P.D-21 Table 11 of the SIA.

The SIA also notes the local social support services and community groups however does not indicate the availability of services relating to issues such as domestic violence, gambling and women’s shelters.

Please provide some discussion of how Regis propose to support the provision of local services to help address the concerns identified in the SIA and those not considered (such as domestic violence, gambling and women’s shelters).

The quotes provided in the request for additional information from DPIE are from Appendix D of the SIA (Hansen Bailey 2019). Appendix D documents comments raised during interviews with stakeholders about the project. These quotes are suggestions from emergency service providers interviewed during the preparation of the SIA; they are not the findings of the SIA.

Notwithstanding, the SIA considers the potential impact to access to services and facilities, which is addressed in Section 6.2.8. In fact, one of the purposes of the SIA is to identify potential gaps in the provision of local and State funded services in a local area, including policing, so that government can allocate resources to fill these gaps, in addition to measures put forward by the proponent as discussed below.

The SIA acknowledges the additional demands that the project will place on existing services and facilities; however, it also notes that local investment facilitated through the project (such as through the Voluntary Planning Agreement (VPA) with Blayney Shire Council (BSC)) will support improvements in, and the possible expansion of, services in the Blayney LGA.

Notably, since submission of the Submissions Report (EMM 2020a) and the Project Amendment Report (EMM 2020b) to DPIE, Regis and BSC have entered into the VPA, which was executed on 15 February 2021. As part of the VPA, Regis will pay an upfront monetary contribution to BSC and then an ongoing payment on an annual basis. BSC are bound to use the funds received for, or towards, a public purpose for local community infrastructure projects that benefit social, sporting/recreation, environmental, economic and public amenity that are consistent with the Blayney Shire Community Strategic Plan.

It is also noted that the economic benefits of the project to the local community and more broadly to the State of NSW will be significant. As reported in the Amendment Report (EMM 2020b), the net social benefit of the project is estimated to be \$244 million present value (at 7% discount rate) (\$336 million with employment benefits included). The economic benefit of the project includes taxes and royalties that will be paid to the State and can also be used to address identified gaps in service provision.

Further to the VPA, the SIA listed the following strategies proposed by Regis to reduce the impact of the construction and operational phase workforce on services provision in the Blayney LGA, and to ensure existing residents have ongoing access to these services:

- project on-boarding should ensure that construction phase personnel are:
  - adequately informed of the range and capacity of health services available in Blayney LGA, service opening hours, and the correct action to take in an emergency and non-emergency situation; and
  - aware of the need to take care of routine health requirements in their home communities and mitigate demands on local services;
- early development of protocols and agreements between Regis and local health and emergency services to help ensure that project demand is anticipated, and potential impacts are appropriately managed in agreement with service providers;
- development of ongoing consultative arrangements between Regis and Chifley Police Local Area Command to ensure relationships are in place to support emergency responses; and
- ongoing communication with Regis, Blayney Multipurpose Health Service (MPHS), the Blayney Health Council and Blayney emergency service providers to monitor demand and anticipate and respond to changes in the cumulative context (as necessary).

This ongoing communication and engagement with local service providers committed to by Regis will assist in monitoring demand for a wide variety of community services, including the services raised by DPIE relating to domestic violence, gambling and women's shelters. The process for this engagement will be outlined in the Social Impact Management Plan (SIMP) to be developed for the project.

Further to the above commitments, Regis participates in the Local Emergency Management Committee, and keeps this committee informed of the project status.

## 5. Anti-social behaviour

Concerns were raised about the potential impacts of an influx in mostly male population and issues around anti-social behaviour. The SIA proposes a suite of measures to addressing the potential for antisocial behaviour. Please advise how Regis proposes to monitor the effectiveness of these measures and respond to instances of anti-social behaviour.
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While concerns were raised about potential anti-social behaviour from the incoming mining workforce, no evidence was provided or found to suggest that this would occur. Notwithstanding this, anti-social behaviour by employees and contractors of the project will not be tolerated by Regis. This will be clearly communicated in the induction program that all employees and contractors will have to complete before commencing work on the project.

As described above, a SIMP will be developed and implemented for the project, which will provide a detailed framework for the management, monitoring and reporting of social impacts. Monitoring will enable the effectiveness of the measures to be evaluated, and to be adjusted accordingly, if required.

An example of a social impact management and monitoring measure that addresses anti-social behaviour is becoming party to a liquor accord, which Regis is investigating as part of the development of the SIMP. Liquor accords are partnerships between licensed venues, community members, local businesses, local councils, police, and other community groups that work together to develop practical solutions to address alcohol-related issues, anti-social behaviour, and violence in local areas. A liquor accord is currently in place in both Bathurst and Orange. Regis will work with the parties to the accord to monitor any changes in anti-social behaviour during the construction and operational phase of the project, and to effectively respond to any reported instances of anti-social behaviour identified.

## 6. Hazard and risk

The Department notes that the preliminary hazard analysis concludes that the project does not represent an offensive or hazardous development and ranks the transport and storage of hazardous materials as a medium risk, particularly the risk of a vehicle accident. The PHA notes that the “transport of hazardous goods to the mine site, while posing a conceivable issue for off site members of the public, is expected to be adequately addressed through strict conformance with the Australian Code for the transport of Dangerous Goods.”

The Health Impact Assessment (Submissions Report Appendix E) states under Hazardous Materials p.ES1 that “there are no impacts in the off-site community. This includes the transport, storage and use of a range of dangerous goods, including explosives, cyanide and LPG. Where there are no impacts there are no risks to community health.” Given the potential for off site impacts does exist, this statement is not strictly correct and therefore requires further clarification.

A Preliminary Hazard Analysis (PHA) was prepared for the project (Risk Mentor 2019, Appendix R of the EIS), which was carried out in accordance with the relevant guidelines, policies and industry requirements, including the NSW Department of Planning (now DPIE) publications:

- Hazardous and Offensive Development Application Guidelines – Applying SEPP 33, 2011;
- Assessment Guideline – Multi Level Risk Analysis 2011;
- Hazardous Industries Planning Advisory Paper No 3 Risk Assessment 2011; and
- Hazardous Industries Planning Advisory Paper No 6 Hazard Analysis 2011.

The PHA considered the off-site transport of dangerous goods, noting that all dangerous goods will be transported to the project area in strict compliance with the *Australian Code for the Transport of Dangerous Goods by Road and Rail* (Australian Transport Code). The PHA concluded that transporting goods in this manner effectively manages the transport risk relevant to all dangerous goods transported to the site, as is the case for the transport of dangerous codes all over Australia.

The Health Risk Assessment (HIA) (EnRiskS 2020, Appendix E of the Submissions Report) then considered the *residual* risk to the local community of dangerous goods transport, ie, the risk to the community once the mitigation measures are place. In the case of dangerous goods, this mitigation measure is transport in accordance with the Australian Transport Code, and with this in place, the HIA found that there is no risk to community health. The assertion that this is not correct by DPIE does not recognise that the assessment of risk by both the PHA and HIA considers the appropriate mitigation measure in place.

## 7. Distributive equity

Section 4.3.3 (p.52) of the SIA notes that “For some near neighbours there is a sense that the local community is disproportionately carrying the costs of mining and is disadvantaged simply because it is at the centre of the impact”. Section 6.2.12 of the SIA discusses distributional and intergenerational equity and notes that the impacts and opportunities of the project may accrue disproportionately throughout the local community. The SIA and Addendum SIA provides no clear discussion about this issue nor do the reports recommend measures with the exception of the VPA to support local community. Please provide discussion about the proposed measures to address potential distributive inequity, and/or provide further measures to address this issue.

The statement that the SIA (Hansen Bailey 2019) and Addendum SIA (Hansen Bailey (2020) provides no clear discussion on the identified issue that impacts will accrue disproportionately to the local community and does not recommend measures, except for the VPA, is not correct. The EIS (EMM 2019) and Amendment Report (EMM 2020b) describe a suite of both avoidance

measures incorporated into the project design, and mitigation measures specifically developed to mitigate the residual impacts on the local community, that Regis is committed to implementing. The avoidance and mitigation of impacts to near neighbours has been a focus of Regis from the start of project planning and design.

In relation to avoidance, the EIS and Amendment Report outline the iterative design process undertaken by Regis to specifically avoid impacts to near neighbours. Most notably was the incorporation of the pit and southern amenity bunds into the project design, and the development of the construction schedule of this bund and the waste rock emplacement to reduce predicted noise levels at Kings Plains.

As described in Section 6.5 of the EIS, preliminary noise modelling was undertaken to predict noise levels at surrounding residences associated with the initial mine design and waste rock emplacement schedule and the use of standard equipment. Early calculations identified that noise emissions had the potential to significantly exceed noise criteria for sensitive receptors residing in the Kings Plains locality.

As a result, several changes to the project design and the incorporation of mitigation measures were considered to achieve a feasible and effective noise reduction from the mine development. Analysis of initial noise predictions showed that the significant contributors to noise levels in Kings Plains were the construction of the waste rock emplacement and the movement of haul trucks, particularly as they exit the open cut pit. Subsequently, significant work was undertaken to redesign the construction of the waste rock emplacement to minimise noise levels on the residents in Kings Plains. The initial design that was considered involved constructing the northern end of the emplacement first and dumping waste rock progressively south. Whilst this was an efficient way to construct the emplacement particularly in terms of haulage distances, the lack of shielding of equipment in this design meant noise emissions would easily propagate south towards Kings Plains.

The emplacement schedule was then re-configured so that dumping of waste rock would commence in the south, building the southern face of the bund first (ie the 'southern amenity bund' shown in Figure 2.1 of the EIS) and as quickly as possible so that this could act as a bund behind which equipment could work as the dump progresses north throughout the rest of the mine life. A second amenity bund was then added to the design immediately south of the pit exit point to shield the noise from trucks exiting the pit (the 'pit amenity bund', as shown in Figure 2.1 of the EIS).

The construction of these two amenity bunds in the initial stages of the mine development resulted in significant improvements to the predicted noise levels at the nearest sensitive receivers, particularly after the bunds were constructed (from about Year 3 onwards). The bunds also served the dual purpose of providing an effective visual barrier of active mining operations to the residents of Kings Plains.

Following the public exhibition of the EIS, further amendments were made to the project, again to further avoid and/or reduce impacts to near neighbours. The amendments that have reduced impacts on the residents in Kings Plains are described in detail in the Amendment Report (EMM 2020b) and are summarised below:

- **Construction schedule** - the careful scheduling of activity in the initial stages of the project so that works on the main structures at the southern end of the mine development project area (such as the water management facilities (WMFs) and the pit amenity bund) will be undertaken generally in sequence rather than in parallel to avoid a high concentration of activity in areas closest to receivers.
- **Mine and waste rock emplacement schedule** – revision of the mine schedule and the subsequent construction sequence of the waste rock emplacement was undertaken, in consideration of predicted noise levels in Kings Plains. The revision to the schedule reduced early activity (and therefore, noise generation) in the southern end of the mine

development project area near Kings Plains while extending the construction timeframe for the southern amenity bund to maintain these reduced noise levels.

- **Open cut design and exit ramps** – the open cut pit design was further optimised and the location of the primary exit ramps for haul trucks was altered, which reduced predicted noise emissions for neighbouring properties.
- **Pit amenity bund** – the optimisation of the open cut pit design and the improved location of the primary exit ramps for haul trucks allowed the size of the pit amenity bund to be reduced, reducing the extent of visual amenity changes associated with this bund.
- **Equipment** – the utilisation of equipment with reduced noise output was incorporated into the mine schedule, particularly in the southern end of the mine development project area.
- **Site access** – a new location for the site access intersection off the Mid Western Highway was identified, approximately 1 km east of the original location assessed in the EIS, in response to feedback from Transport for NSW (TfNSW) and the community. This change reduced the predicted noise levels at the nearest residential property adjacent to the original location.
- **Mine administration and infrastructure area** – the layout of this area was revised and optimised to further integrate into the surrounding natural topographical shielding in the area, reducing its visibility.

In relation to noise, the outcome of these design measures is that the daytime noise levels associated with the project are expected to comply with criteria at all receivers throughout the life of the mine, including all residents in Kings Plains.

Further, noise levels during evening and night time periods are predicted to be below the relevant criteria for all residences except for some minor exceedances of up to 2 dB at some receivers in Kings Plains during Year 1 and Year 4. Levels are predicted to exceed criteria by up to 3 dB for a period in Year 1 at only one property, (R28a) where there is development approval to build a residence. Notably, since submission of the Amendment Report, Regis has purchased R28a.

Notwithstanding the significant improvements in predicted noise levels achieved through avoidance by design, Regis remains committed to implementing negotiated agreements with identified landholders in Kings Plains. As described previously in this response, and in Section 5.2.1 of the Amendment Report, these negotiated agreements included tailored mitigation plans for individual properties.

As described in Section 6.6 of the Amendment Report, the changes made to the mine design for which approval is sought, primarily to reduce noise impacts, also further improved the predicted air quality outcomes. The predicted concentrations and deposition rates for particulate matter and gaseous pollutants are below the applicable impact assessment criteria at near neighbours for all assessed stages of the mine development.

Once all avoidance measures were incorporated into the project design, a range of mitigation measures were identified to further manage and mitigate residual impacts to near neighbours. The updated summary of commitments provided in Appendix C of the Amendment Report outlines the mitigation measures which Regis are committed to implementing to further reduce the residual impact of the project, particularly on near neighbours. These measures include mitigation measures relating to noise, blasting, air quality, water resources and visual amenity.

## 8. Accommodation

The SIA has identified the potential accommodation shortages in the Blayney LGA to meet demands of the project and potential impacts which include:

- increased demand for short term accommodation by the construction workforce, which presents challenges for competing local industry and businesses
- workforce accommodation demands reducing accessibility and affordability to private housing for existing and future residents
- increased pressure upon local services, facilities and infrastructure
- displacing lower income households and loss of social diversity

The SIA and SIA Addendum includes the proposed Workforce Accommodation Management Framework which includes objectives to address some of these issues. However further detail is required about the proposed performance criteria from Regis against which the implementation of this strategy can be assessed. Please also provide further discussion about strategies Regis is considering to address the potential issue of insufficient accommodation for workers.

The SIMP to be developed for the project will include a detailed framework for monitoring accommodation availability and performance criteria against which measures implemented will be assessed.

In relation to addressing the potential for accommodation shortages in the local region, Regis continues to encourage and support expansion of accommodation in the area. A notable development in the future availability of accommodation in Blayney is the recent approval of the Blayney Bowling Club re-development by BSC. This development involves the construction of hotel style accommodation at the bowling club site, which is currently closed and not in use. The development will provide accommodation for approximately 90 people in stage 1, and a further 40 in stage 2.

It is also noted that not all of the construction and operational workforce will be housed in the Blayney LGA. The SIA identified accommodation availability in the broader region including in Bathurst and Orange. The SIMP will describe measures to meet accommodation demands utilising availability in the region. As described in the response above, Regis will also work with Orange360 to monitor accommodation availability. Details on Orange260 are provided below.

## 9. Local labour draw

The SIA (p.22) notes that approximately 60% (367 workers) of the total construction workforce for the mine development and 20% (24) of the pipeline construction workforce is anticipated to be local hires, which may result in labour draw from existing local employers. Please clarify the statement made in the SIA (s 6.2.9) that Regis will “monitor local labour supply and adjust local labour recruitment practices and rates accordingly”.

Regis are part of a group facilitated by Orange360, which monitors accommodation availability and employment in the region. Orange360 is a regional tourism initiative, formed by BSC in partnership with Orange City Council and Cabonne Council, to market the regional area and grow the tourism industry. Involvement in this group by Regis will provide an effective means of monitoring labour supply. Regis also meets regularly with major employers in the area, as well as training providers and council. This engagement will continue throughout the life of the project and will provide an effective means of collaboratively monitoring and addressing any issues with labour supply or accommodation availability if they arise.

The SIMP for the project will further describe a detailed framework for monitoring local labour supply and adjusting recruitment practices accordingly.

## 10. Closing

If you require any further detail or wish to discuss the information provided, please do not hesitate to contact either Danielle Wallace ([dwallace@regisresources.com](mailto:dwallace@regisresources.com)) or Andrew Wannan ([awannan@regisresources.com](mailto:awannan@regisresources.com)).

Yours sincerely

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

**Tony McPaul**  
Manager – Special Projects  
Regis Resources Ltd

## **References**

EMM Consulting 2019, *McPhillamys Gold Project Environmental Impact Statement*, Prepared for LFB Resources NL.

EMM Consulting 2020a, *McPhillamys Gold Project Submissions Report*, Prepared for LFB Resources NL.

EMM Consulting 2020b *McPhillamys Gold Project Amendment Report*, Prepared for LFB Resources NL.

Hansen Bailey 2019 *McPhillamys Gold Project Social Impact Assessment*, Prepared for LFB Resources NL.

Hansen Bailey 2020, *McPhillamys Gold Project Social Impact Assessment Amended Project Report*, prepared for Regis by Hansen Bailey.

Landskape 2019, *Aboriginal and Historical Cultural Heritage Assessment*, Prepared for LFB Resources NL.

Landskape 2020, *Addendum to the Aboriginal and Historical Cultural Heritage Assessment*, Prepared for LFB Resources NL.

NSW Government 2018, *Voluntary Land Acquisition and Mitigation Policy*.

OzArk Environment & Heritage 2019, *Aboriginal Cultural Heritage & Historic Heritage Report, McPhillamys Gold Project: Pipeline development*,

OzArk Environment & Heritage 2020, *Addendum Aboriginal Cultural Heritage & Historic Heritage Report, McPhillamys Gold Project: Mine Access Road and Pipeline Options*,



## McPhillamys Gold Project – Social Impact Assessment

### 2021-09-20: Review of Regis 14 September 2021 Response to Minor RFI dated 24 August 2021 and Identified Residual Issues

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#### 3. Impacts of Stress and Anxiety

The response states that Regis:

*...recently undertook a community sentiment survey across the Blayney LGA to gain an understanding of community views and concerns relating to the project. The results of the survey will be used to ensure the means and timing of engagement is tailored to address areas of concern or uncertainty.*

Can Regis provide a summary of the key findings of the survey and how it proposes to address these views and concerns in its engagement.

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#### 4. Local Services

Regis notes in its response to the DPIE questions on local services that as part of the VPA with Blayney Shire Council (Council),

*...Regis will pay an upfront monetary contribution to BSC and then an ongoing payment on an annual basis. BSC are bound to use the funds received for, or towards, a public purpose for local community infrastructure projects that benefit social, sporting/recreation, environmental, economic and public amenity that are consistent with the Blayney Shire Community Strategic Plan.*

The concerns raised by the community relate to how this funding will benefit the community of Kings Plains. Can Regis provide further discussion about what mechanisms can be put in place to ensure distribution of funding towards the Kings Plains community.

Regis also states that one of the key strategies in the Social Impact Assessment (SIA) is the:

*early development of protocols and agreements between Regis and local health and emergency services to help ensure that project demand is anticipated, and potential impacts are appropriately managed in agreement with service providers*

Can Regis provide further information to clarify what this means and provide practical examples of how the impacts on demand can be managed.

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#### 6. Hazard and Risk

Regis reiterates that the Health Impact Assessment found that there is no risk to community health.

DPIE maintains its position that zero risk is not feasible. Generally, while the procedures and compliance with codes would minimise risk to an acceptable level, this does not eliminate the risk. Can Regis provide clarification about how the HIA is framing this risk and what it means by “no risk” to community health.

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#### 7. Distributive equity

The Regis response describes measures to address distributive inequity including elements of the project that were re-designed as part of the Amended Application, negotiated agreements with affected

landowners and at-receiver mitigation to mitigate and minimise impacts at receivers surrounding the project.

Please provide further discussion on how Regis proposes to address distributive inequity for other groups within the region (e.g. low-income households) and address the potential intergenerational equity issues of the project as identified in the SIA.

In particular, please provide further information on how Regis proposes to support the Kings Plains community, including provision of any means for additional funding for implementation of what measures, which would benefit the Kings Plains community.

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## **8. Accommodation; and 9. Local Labour Draw**

The Department notes that Regis has identified the approval of the Blayney RSL as one measure to address a potential shortfall in worker accommodation for the project. It also refers to Orange360 to monitor accommodation availability and employment in the region.

While this approach can identify a shortfall, one development may not fully address a shortfall in accommodation. Can Regis elaborate on what strategies it can implement when the monitoring identifies a shortfall in accommodation, particularly any practical examples and responses to this issue.

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## **General**

Please proof-read the document for any typos; e.g. was '*Orange260*' on p.11 meant to be '*Orange360*'?

7 October 2021

Mr Stephen O'Donoghue  
Director – Resource Assessments  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

**Re: McPhillamys Gold Project (SSD 9505) – Response to minor RFI dated 24-08-2021**

Dear Steve,

This letter provides a response to the request for information (RFI) from the NSW Department of Planning, Industry and Environment (DPIE), dated 24 August 2021, in relation to the Social Impact Assessment (SIA) of the McPhillamys Gold Project (the project). Each request is reproduced in the box and a response provided below.

**1. Impacts due to displacement associated with the voluntary acquisition of properties in Kings Plains**

Regis has advised the Department that it has progressed negotiated agreements with 17 of the affected landowners in Kings Plains, which includes an option for the landowner to voluntarily request that Regis purchase their property at any time within 10 years from the date when the board of directors makes its final decision to proceed with the project. The consequences of this acquisition and subsequent relocation of residents from the area may cause negative social impacts on the remaining community of Kings Plains which require adaptive management. Please provide some consideration of these impacts and discuss measures that Regis would consider implementing if required to mitigate these impacts.
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Firstly, as described in the Submissions Report (EMM 2020a), it is noted that the noise and air quality models developed for the project do not predict any properties will experience noise or dust levels that trigger the requirement for acquisition set out in the *Voluntary Land Acquisition and Mitigation Policy* (VLAMP) (NSW Government 2018). In fact, the levels are well below. Predicted noise and dust levels are also below the triggers in the VLAMP for mitigation requirements at all privately owned properties. The Submissions Report reported that one property (R28a), was predicted to experience levels of up to 3 decibels (dB) above the relevant noise criteria for a short period in Year 1 of the project, triggering the application of voluntary mitigation rights for that property. Since completion of the Submissions Report, Regis has negotiated and signed a landholder agreement with the owner of this property.

Notwithstanding the fact that predicted levels are below the triggers for mitigation and acquisition rights specified in the VLAMP, to effectively mitigate residual air, noise and visual amenity impacts and minimise the risk of outmigration of residents from Kings Plains, Regis has committed to, and is in the process of, negotiating agreements with landholders in Kings Plains, which include tailored landscape and mitigation plans for their individual properties.

As described in the Submissions Report (EMM 2020a), 20 agreements are being progressed, and Regis has continued to progress these agreements with landholders since the lodgement of the Submissions Report in September 2020. At the time of writing this response, a total of 18

agreements have now been provided to landholders, which include tailored landscape plans where the landholder has requested such plans. Regis worked collaboratively with the landholders on these plans. Regis is also working on issuing the final two agreements as soon as possible.

As noted by DPIE, Regis is also going a step further in the negotiation of these agreements by including a clause in the majority (i.e. 18 of the 20 agreements) that states landowners may request Regis purchase their property at any time within ten years from the date that development consent is granted (provided the consent remains in force), and the Regis Board approves the project.

While the negotiated agreements contain an acquisition clause, a key focus of the agreements are the property specific-management and mitigation plans developed in agreement with individual landowners. The purpose of the mitigation plans is to implement effective measures to mitigate residual air quality, noise and visual impacts of the project, specific to each individual property, such that the impacts are mitigated to an acceptable level, with the ultimate outcome of residents staying in Kings Plains. As described in the SIA (Hansen Bailey 2019), to further minimise the risk of outmigration from Kings Plains, Regis is also committed to demonstrating to the community an ability to develop the mine and comply with all regulatory requirements.

If a property owner were to take up the acquisition offer and sell their property to Regis, Regis will seek to make the property available for rent to existing residents in the Blayney local government area (LGA) and the incoming workforce, as is the case with the other properties owned by Regis. Therefore, acquisition would not likely result in a population change in Kings Plains.

The Department understands that Regis has engaged the services of Gary West to assist with its discussions with these landowners. Can Regis describe the progress of these discussions, the steps taken and provide information (that can be made publicly available) to demonstrate how these discussions have been transparent, fair and reasonable.
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A number of residents in Kings Plains have engaged the services of Mr Warwick Gibblin of OzEnvironmental to negotiate on their behalf in the process of negotiating agreements with Regis. Regis subsequently engaged Mr Gary West to facilitate a meeting with Mr Gibblin and the group he represents. Mr Gibblin represents less than half of the landowners with which Regis are currently negotiating agreements. Negotiations are well progressed with the remaining landholders.

A meeting was planned to be held in Blayney between Mr Gibblin and Regis earlier this year. Mr West was to facilitate this meeting; however, Covid-19 restrictions at the time of the planned meeting prevented it from being held in person. Regis offered to hold the meeting by video conference, but Mr Gibblin declined the offer. The meeting has now been delayed until it can be held in person. Regardless, Regis is continuing to issue and negotiate agreements to all relevant landholders.

In relation to the process of developing the agreements and mitigation measures for each property, the measures have been divided into stage one and stage two. Once agreement is reached between Regis and a landholder, stage one measures are implemented, which primarily involve implementing vegetation screening plans developed in consultation with the landowner. Stage two measures will be implemented if development consent is granted for the project, and prior to mining operations commencing. In addition to the stage one and two measures, the agreements also include a commitment by Regis to contribute to the electricity costs associated with the operation of air conditioning or contribute to the installation of solar panels.

It is also noted that at the time of completing the Submissions Report (EMM 2020a), 15 of the 20 draft agreements included a voluntary acquisition clause. As a result of ongoing negotiation with landholders, 18 of the agreements now include this acquisition clause. Further, Regis has

increased the timeframe for acquisition from that originally offered (5 years) to 10 years, following discussions with landholders. This increase in the time period for which acquisition can be requested of Regis was requested by one landholder. To ensure transparency and equity for all landholders involved in negotiating agreements, the increased time period was added to all agreements by Regis. While some parts of the agreement are standardised, they have been tailored to individual circumstances.

Further, as described above, the implementation of agreements with an acquisition upon request clause is above and beyond what is required by government policy (ie VLAMP), demonstrating Regis's commitment to work collaboratively, fairly, and in accordance with best practice with the Kings Plains community.

## 2. Cultural impacts

<p>The SIA and SIA Addendum Reports do not propose specific mitigation measures relating to cultural loss other than to “manage impacts to amenity; undertake progressive rehabilitation; support the participation of near neighbours in aspects of rehabilitation and mine closure planning, etc.” (6.3.3 on p.167 of the SIA). Provide further detail about how proposed measures not discussed in the SIA address these issues and/or consider what additional mitigation measures can be implemented to manage impacts on cultural values, the rural way of life and sense of place for the community as a result of the project.</p>
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### Cultural values

As described in the Environmental Impact Statement (EIS) for the project (EMM 2019), land within the project area has been extensively modified by agricultural land uses including cropping and grazing, historical mining activities and construction of roads and utilities.

A number of Aboriginal heritage sites were identified within the mine project area, comprising small scatters or isolated finds of stone artefacts. The Aboriginal Cultural Heritage Assessments prepared for the project (Landskape 2019, Landskape 2020, OzArk 2019 and OzArk 2020) found that up to 30 Aboriginal heritage sites will be impacted by the mine development (27 directly impacted and three indirectly impacted), and a total of seven Aboriginal sites will be disturbed by the pipeline route if the northern alignment is constructed, and eight if the southern option is constructed.

Importantly, Landskape (2019) noted that although the sites in the project area are representative of a region wide distribution of Aboriginal occupation sites, they hold low scientific significance and are significantly disturbed, consistent with the historical agricultural land use of the area. Considering this, the mine development and subsequent impacts on identified sites will not cause cumulative impacts to the region's Aboriginal cultural heritage value.

Further, as reported in Section 7.1.2 of the Aboriginal Cultural Heritage Assessment (Landskape 2019), the RAPs did not identify any high spiritual, traditional, historical, or contemporary associations with the archaeological sites identified in the project area.

Notwithstanding, Regis has committed to a range of measures to effectively mitigate impacts to Aboriginal cultural heritage as a result of the project. All sites identified within the disturbance footprint of the project will be salvaged prior to land disturbance, in collaboration with the Registered Aboriginal Parties (RAPs). A keeping place for salvaged artefacts will be determined as part of the development of the Cultural Heritage Management Plan (CHMP) and in consultation with RAPs and Heritage NSW.

As described in Section 3.3.4 of the SIA Addendum prepared for the project (Hansen Bailey 2020, Appendix S of the Amendment Report (EMM 2020b)), Regis is committed to involving the local Aboriginal community as integral participants in the management of Aboriginal cultural heritage values in the mine project area. Regis will continue to involve the RAPs and other relevant Aboriginal community groups or members in matters pertaining to the mine development. Further

to the management of specific sites, the following mitigation and management measures will therefore be implemented to ensure the appropriate management of Aboriginal cultural heritage within the project area:

- invitation for the continued participation of RAPs; in particular for the recording, collection, curation, storage and replacement of artefacts;
- provision of cultural awareness training for site personnel, likely through the site induction process;
- the preparation of a CHMP, which will guide the mitigation and management of sites in the project area and help to avoid inadvertent impacts. The CHMP will also outline the protocol for unanticipated finds such as artefacts and skeletal remains; and
- Regis will consult with the Orange Local Aboriginal Land Council (OALC) regarding the commission of a social and cultural mapping study with relevant traditional owners for the project area.

Consultation has been ongoing with the RAPs and OALC regarding proposed mitigation and future management options relating to cultural heritage.

#### Rural way of life and sense of place

The SIA (Hansen Bailey 2019) acknowledged that the project has the potential to adversely impact rural values in the Kings Plains locality. The rural way of life in the area is characterised by the presence of rural vistas, livestock (cattle) grazing, outdoor activities including equine activities and close social connections between residents.

As all mining activity would be undertaken on land owned by Regis, there is no potential for the project to have direct impacts on rural farming practices. However, the EIS and SIA acknowledged that the project will alter rural vistas immediately adjacent to the mine development area in Kings Plains. Regis has therefore committed to a range of measures to reduce and mitigate this impact. Firstly, the project design has been carefully considered to manage the potential visual impacts of the project, including the following:

- the processing plant and mine infrastructure areas have been sited to maximise the separation of these project elements and sensitive receivers and to take advantage of existing topography that will screen these elements;
- the open cut pit and southern amenity bunds will be developed as a priority to screen development of open cut, infrastructure and haul roads at early stage of mine development;
- the waste rock emplacement staging will be refined to create progressive minor screening bunds;
- micro-topographic design will be incorporated into the final landform;
- property acquisition has been undertaken to provide a substantial buffer in some directions between the proposed mine infrastructure and nearby residences; and
- progressive rehabilitation will be undertaken throughout the mine life. At the end of mining, mine infrastructure will be decommissioned, and disturbed areas will be rehabilitated to integrate with natural landforms as far as practicable. The final landform, apart from the final void, will support land uses similar to current land uses or land uses consistent with land use strategies for the Blayney and Cabonne LGAs.

Secondly, as described above, residences in Kings Plains will receive residential landscape mitigation treatments to screen or mitigate views of the mine development. Regis are committed to, and are actively negotiating, agreements with landholders which include these tailored mitigation plans for residents.

Further, as described in the SIA (Hansen Bailey 2019), the project has the potential to benefit rural landowners in the region through the provision of employment opportunities as a supplement to existing rural employment, and through service capacity improvements in the Kings Plains rural fire brigade and the Canobolas Zone rural fire service. Regis will also provide the opportunity for part-time employment at the mine. This will enable people who live on rural properties to combine employment off-farm with working on the land, facilitating a continuation of a rural way of life.

### 3. Impacts of stress and anxiety

In the SIA and section 5.5.4 of the Submissions Report, Regis proposes to manage resident stress and anxiety in relation to the project by implementing the Stakeholder Engagement Framework, which includes engaging and maintaining “transparent, evidence based and ongoing dialogue with concerned property owners and other community members”. Consider further measures about when to engage / empower the community to build trust and reduce stress and outrage and how to verify the effectiveness of these measures.

#### Stakeholder engagement

As noted in the Department’s request for further information and described in the Submissions Report (EMM 2020a), the primary way in which Regis proposes to manage and reduce the potential for stress and anxiety in the community is for the company to actively engage with concerned property owners and other community members. The primary purpose of this engagement is to ensure community members remain informed about the project, thereby reducing uncertainty and the associated stress and anxiety. Regis engages with the community in a number of ways and is committed to continuing this engagement throughout all phases of the project, from construction to operation and rehabilitation and closure. Methods of engagement and communication include:

- **Project website** – the website is regularly updated by the Regis team to provide an up-to-date source of information for the community.
- **Newspaper articles** - fortnightly articles on the project are published in the Blayney Chronicle.
- **Community consultative committee (CCC)** – The CCC was established for the project in August 2018 and has facilitated opportunities for community participation in the project. The CCC generally meets every two to three months and minutes from these meetings are published on the project website (<https://www.mcphillamysgold.com/>). Regular meetings of the CCC have continued since the submission of the Amendment Report and Submissions Report, with the latest one held in August 2021.
- **Newsletters** - newsletters and project updates are regularly sent via email to the project community email distribution list (which includes over 1,000 contacts).
- **Community relations team** – This team is available to discuss the project at the McPhillamys Gold Project office in Blayney. Regis opened their local office in Blayney in 2013, where Regis staff are available to discuss the project with the community.
- **Landholder discussions** – Discussions are ongoing with the broader landholders in the project area surrounds, including the 20 landowners in Kings Plains with whom Regis is in the process of negotiating agreements. Regis has been actively engaging with landholders to develop tailored mitigation plans for their property.

The Stakeholder Engagement Framework for the project will be further developed as part of the Social Impact Management Plan. This framework will outline the tools and timing of engagement, to ensure that engagement is undertaken in such a way to build trust with the community.

The inclusion of the clause stating that landowners can request Regis purchase their property in the agreements with Kings Plains residents also primarily seeks to respond to the anxiety

expressed by landowners in relation to the uncertainty about how future impacts may be experienced, particularly impacts to property values, and impacts to way of life and the use and enjoyment of their private property.

#### Community sentiment survey – findings and outcomes

In addition to the ongoing engagement activities described above, Regis undertook a community sentiment survey earlier this year across the Blayney, Cabonne, Bathurst and Orange LGAs to gain an understanding of community views and concerns relating to the project and to inform future community engagement activities.

The survey was conducted by Newgate Research in April and May 2021. The research methodology employed by Newgate Research comprised the following:

1. a qualitative program involving six two-hour focus groups with a total of 51 members of the local community near the mine development project area; and
2. a combined telephone and online survey with a total of 405 participants across the Blayney, Cabonne, Bathurst and Orange LGAs.

Participants of the focus groups were recruited by a reputable qualitative participant recruitment organisation, Country Opinions, and were recruited to be broadly representative of the community with a balance male and females of different ages, life stages, working status and cultural background. Similarly, participants of the online and telephone survey were sourced by a professional market research panel, with a balance of gender, age and location. All participants were aged 18 years and over.

The results of the survey showed broad community support for the project, and notably, when provided with more information about the project, the level of positive responses from the community increased. Overall, when informed about the project, 73% of participants stated they felt positive towards the project, and 85% of participants agreed that the project will specifically benefit the Central West region through an economic boost and increased job opportunities. One in five agreed that the project will benefit them personally.

At the start of the survey and group sessions, initial open-ended questions were asked of participants to gain an understanding of the current local issues of importance and concern to the community. The answers revealed that insufficient maintenance of roads and lack of health services and job opportunities are the top issues of concern. The potential of a gold mine being built was a lower order issue by far compared to these issues, with only five participants (1%) mentioning the proposed project, all of whom reside in the Blayney LGA. Mining in general was only mentioned by one participant.

Questions were then asked about general attitudes towards mining and the mining industry, followed by questions relating specifically to the project, including awareness of the project, unprompted opinions on the project, and informed perceptions of the project.

Key findings can be summarised as follows:

- General attitudes towards mining:
  - Close to six in ten participants (58%) felt positive towards mining, with support for the industry significantly higher in Orange (68%) compared to all other LGAs. Of the participants from Blayney, 59% felt positive about mining, while 19% stated they felt neither positive or negative, and 22% indicated a negative sentiment towards the industry.
- Awareness of the project:
  - The survey results revealed a very high level of awareness about the project in the Blayney LGA, and a significantly higher levels of awareness than those in other



LGAs, with 91% of participants from Blayney being aware of the project. Overall, just over half of all participants were aware of the project.

- Unprompted opinions of the project:
  - When asked about the project based on their existing knowledge, approximately half (49%) of all participants felt positively towards the project, with 34% feeling neutral and 17% having a negative opinion of the project. Variations by LGA were not statistically significant. The 49% who rated the project positively stated that this was driven by employment opportunities (55%), economic benefits (25%) and general feelings of support for the project (25%).
- Informed perceptions of the project:
  - When shown information about the project, 24% of participants became more positive towards the project, bringing the overall positivity score to 73%, including 71% in the Blayney LGA. There was a slight shift in negativity with 2% becoming less negative towards it, resulting in 15% of all participants indicating they were either 'somewhat' or 'very' negative about the project, including 18% in Blayney LGA. These results are illustrated in Figure 1 and Figure 2 below.

The survey also asked participants about their preferred communication channels, so that Regis can tailor engagement to best meet the community's wants and needs. The results of the survey showed most support for an up-to-date website (73%), community or public meetings (65%), and newsletters in central locations (66%), inserted in local newspapers (62%) or delivered to homes (59%), with preferences within Blayney reflecting those of the Central West more broadly. As described above, Regis currently employs these methods of communication, and will continue to do so.

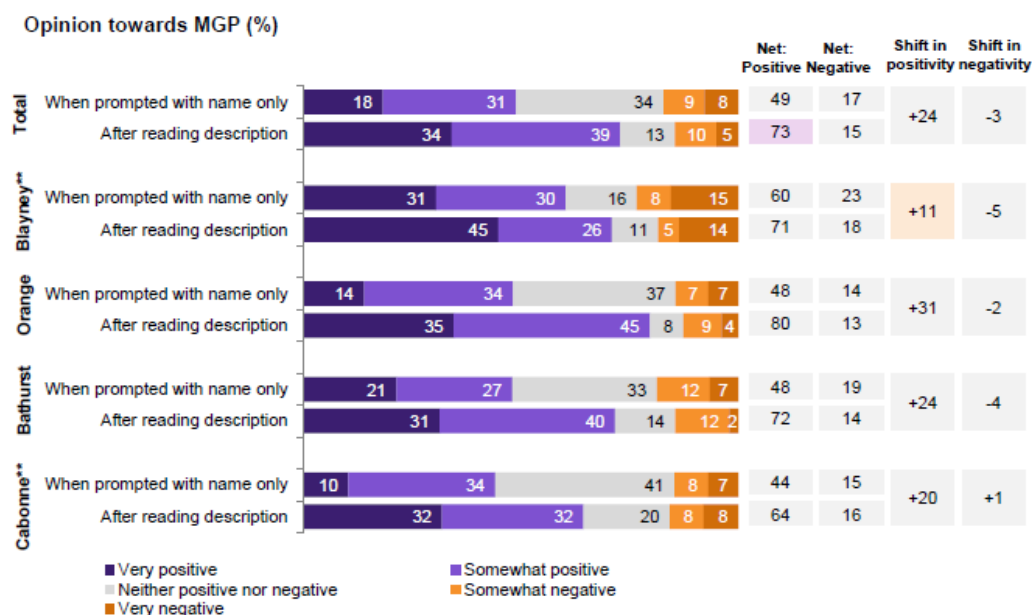
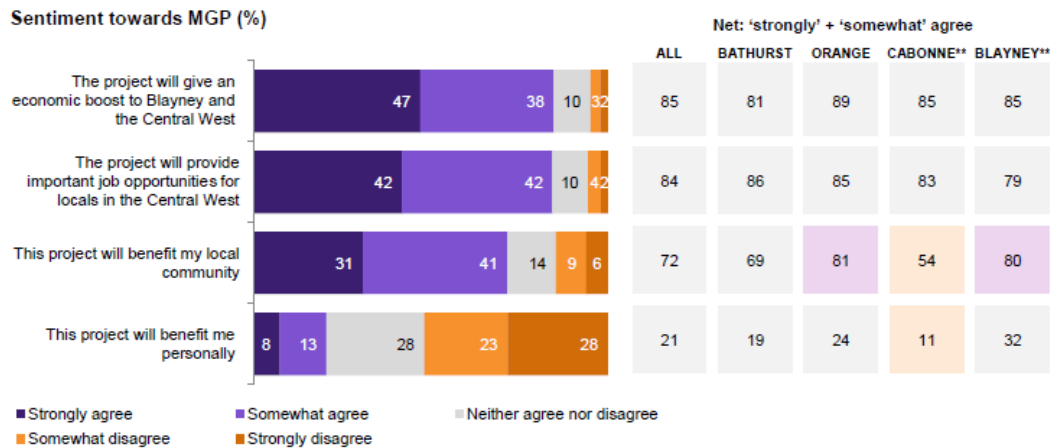


Figure 1 – Opinion towards the project



**Figure 2 - Sentiment towards the project**

#### 4. Local services

The SIA identified the potential impacts on local services due to an increased construction workforce and reduced availability of these services for the community. These impacts include:

- Police: “a noticeable gap in service provision” p. D-19 Table 10 of the SIA.
- “There is a risk of limited health service access and potential for poorer health outcomes in Blayney if there is a significant increase in permanent population and in the instance where the medical service is not able to increase capacity” p.D-19 Table 10 of the SIA.
- “increased demand and limited capacity for identified vulnerable groups within the social housing, medical and aged care sectors: P.D-21 Table 11 of the SIA.

The SIA also notes the local social support services and community groups however does not indicate the availability of services relating to issues such as domestic violence, gambling and women’s shelters.

Please provide some discussion of how Regis propose to support the provision of local services to help address the concerns identified in the SIA and those not considered (such as domestic violence, gambling and women’s shelters).

The quotes provided in the request for additional information from DPIE are from Appendix D of the SIA (Hansen Bailey 2019). Appendix D documents comments raised during interviews with stakeholders about the project. These quotes are suggestions from emergency service providers interviewed during the preparation of the SIA; they are not the findings of the SIA.

Notwithstanding, the SIA considers the potential impact to access to services and facilities, which is addressed in Section 6.2.8. In fact, one of the purposes of the SIA is to identify potential gaps in the provision of local and State funded services in a local area, including policing, so that the appropriate levels of government can allocate resources to fill these gaps, in addition to measures put forward by the proponent as discussed below.

The SIA acknowledges the additional demands that the project will place on existing services and facilities; however, it also notes that local investment facilitated through the project (such as through the Voluntary Planning Agreement (VPA) with Blayney Shire Council (BSC)) will support improvements in, and the possible expansion of, services in the Blayney LGA.

Notably, since submission of the Submissions Report (EMM 2020a) and the Project Amendment Report (EMM 2020b) to DPIE, Regis and BSC have entered into the VPA, which was executed

on 15 February 2021. As part of the VPA, Regis will pay an upfront monetary contribution to BSC and then an ongoing payment on an annual basis. BSC are bound to use the funds received for, or towards, a public purpose for local community infrastructure projects that benefit social, sporting/recreation, environmental, economic and public amenity that are consistent with the Blayney Shire Community Strategic Plan.

In relation to questions raised as to how the funding via the VPA will specifically benefit Kings Plains, it is noted that the Kings Plains settlement is part of the broader Blayney community. The settlement comprises mostly small acreages and lifestyle blocks approximately 7 km from the centre of Blayney. Being an outer area of Blayney, the Kings Plains residents rely on the community infrastructure and services (such as health and education) of Blayney. Therefore, the fact that BSC is bound to use the funds for or towards “a public purpose for local community infrastructure projects” means that these funds will also benefit the residents of Kings Plains.

Further to this, if the project is approved, part of Dungeon Road will be closed and sold by BSC. While the proceeds of the sale of Dungeon Road are untied and sit outside of the VPA, at the ordinary council meeting on 15 February 2021, BSC agreed in principle that these funds should be allocated to roads around the Walkom Road, Village Road, Guyong Road and Vittoria Road areas (ie around the Kings Plains locality), thus providing a further benefit to the residents of Kings Plains. It is also noted that the economic benefits of the project to the local community and more broadly to the State of NSW will be significant. As reported in the Amendment Report (EMM 2020b), the net social benefit of the project is estimated to be \$244 million present value (at 7% discount rate) (\$336 million with employment benefits included). The economic benefit of the project includes taxes and royalties that will be paid to the State and can also be used to address identified gaps in service provision.

Further to the VPA, the SIA listed the following strategies proposed by Regis to reduce the impact of the construction and operational phase workforce on services provision in the Blayney LGA, and to ensure existing residents have ongoing access to these services:

- project on-boarding should ensure that construction phase personnel are:
  - adequately informed of the range and capacity of health services available in Blayney LGA, service opening hours, and the correct action to take in an emergency and non-emergency situation; and
  - aware of the need to take care of routine health requirements in their home communities and mitigate demands on local services;
- early discussions between Regis and local health and emergency services during the project start-up phase to help ensure that project demand is anticipated, and potential impacts are appropriately managed in agreement with service providers;
- development of ongoing consultative arrangements between Regis and Chifley Police Local Area Command to ensure relationships are in place to support emergency responses; and
- ongoing communication with Regis, Blayney Multipurpose Health Service (MPHS), the Blayney Health Council and Blayney emergency service providers to monitor demand and anticipate and respond to changes in the cumulative context (as necessary).

This ongoing communication and engagement with local service providers committed to by Regis will assist in monitoring demand for a wide variety of community services, including the services raised by DPIE relating to domestic violence, gambling and women’s shelters. The process for this engagement will be outlined in the Social Impact Management Plan (SIMP) to be developed for the project.

An example of how Regis is already working with emergency service providers to help ensure adequate services are maintained is in relation to the Rural Fire Service (RFS) in Blayney. Initial

discussions have taken place with the RFS about how additional capability, if required, will best be achieved; for example, by Regis developing internal capacity to respond to emergency events or through the provision of funding to enable the RFS to build on their existing capability.

Further to the above commitments, Regis participates in the Local Emergency Management Committee, and keeps this committee informed of the project status.

## 5. Anti-social behaviour

Concerns were raised about the potential impacts of an influx in mostly male population and issues around anti-social behaviour. The SIA proposes a suite of measures to addressing the potential for antisocial behaviour. Please advise how Regis proposes to monitor the effectiveness of these measures and respond to instances of anti-social behaviour.
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While concerns were raised about potential anti-social behaviour from the incoming mining workforce, no evidence was provided or found to suggest that this would occur. Notwithstanding this, anti-social behaviour by employees and contractors of the project will not be tolerated by Regis. This will be clearly communicated in the induction program that all employees and contractors will have to complete before commencing work on the project.

As described above, a SIMP will be developed and implemented for the project, which will provide a detailed framework for the management, monitoring and reporting of social impacts. Monitoring will enable the effectiveness of the measures to be evaluated, and to be adjusted accordingly, if required.

An example of a social impact management and monitoring measure that addresses anti-social behaviour is becoming party to a liquor accord, which Regis is investigating as part of the development of the SIMP. Liquor accords are partnerships between licensed venues, community members, local businesses, local councils, police, and other community groups that work together to develop practical solutions to address alcohol-related issues, anti-social behaviour, and violence in local areas. A liquor accord is currently in place in both Bathurst and Orange. Regis will work with the parties to the accord to monitor any changes in anti-social behaviour during the construction and operational phase of the project, and to effectively respond to any reported instances of anti-social behaviour identified.

## 6. Hazard and risk

The Department notes that the preliminary hazard analysis concludes that the project does not represent an offensive or hazardous development and ranks the transport and storage of hazardous materials as a medium risk, particularly the risk of a vehicle accident. The PHA notes that the “transport of hazardous goods to the mine site, while posing a conceivable issue for off site members of the public, is expected to be adequately addressed through strict conformance with the Australian Code for the transport of Dangerous Goods.”
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The Health Impact Assessment (Submissions Report Appendix E) states under Hazardous Materials p.ES1 that “there are no impacts in the off-site community. This includes the transport, storage and use of a range of dangerous goods, including explosives, cyanide and LPG. Where there are no impacts there are no risks to community health.” Given the potential for off site impacts does exist, this statement is not strictly correct and therefore requires further clarification.
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A Preliminary Hazard Analysis (PHA) was prepared for the project (Risk Mentor 2019, Appendix R of the EIS), which was carried out in accordance with the relevant guidelines, policies and industry requirements, including the NSW Department of Planning (now DPIE) publications:

- Hazardous and Offensive Development Application Guidelines – Applying SEPP 33, 2011;
- Assessment Guideline – Multi Level Risk Analysis 2011;

- Hazardous Industries Planning Advisory Paper No 3 Risk Assessment 2011; and
- Hazardous Industries Planning Advisory Paper No 6 Hazard Analysis 2011.

The PHA considered the off-site transport of dangerous goods, noting that all dangerous goods will be transported to the project area in strict compliance with the *Australian Code for the Transport of Dangerous Goods by Road and Rail* (Australian Transport Code). The PHA concluded that transporting goods in this manner effectively manages the transport risk relevant to all dangerous goods transported to the site, as is the case for the transport of dangerous codes all over Australia.

The Health Risk Assessment (HIA) (EnRiskS 2020, Appendix E of the Submissions Report) then considered the *residual* risk to the local community of dangerous goods transport, ie, the risk to the community once the mitigation measures are place. In the case of dangerous goods, this mitigation measure is transport in accordance with the Australian Transport Code, and with this in place, the HIA found that there is no risk to community health. The assertion that this is not correct by DPIE does not recognise that the assessment of risk by both the PHA and HIA considers the appropriate mitigation measure in place.

Regis acknowledges DPIE's position that the risks relating to the transport of dangerous goods is not completely eliminated by compliance with the Code. However, the PHA found that compliance with the Code mitigates the risk to an acceptable level, which is what the HIA is referencing when it referred to 'no risk' to the community.

## 7. Distributive equity

<p>Section 4.3.3 (p.52) of the SIA notes that "For some near neighbours there is a sense that the local community is disproportionately carrying the costs of mining and is disadvantaged simply because it is at the centre of the impact". Section 6.2.12 of the SIA discusses distributional and intergenerational equity and notes that the impacts and opportunities of the project may accrue disproportionately throughout the local community. The SIA and Addendum SIA provides no clear discussion about this issue nor do the reports recommend measures with the exception of the VPA to support local community. Please provide discussion about the proposed measures to address potential distributive inequity, and/or provide further measures to address this issue.</p>
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The statement that the SIA (Hansen Bailey 2019) and Addendum SIA (Hansen Bailey (2020) provides no clear discussion on the identified issue that impacts will accrue disproportionately to the local community and does not recommend measures, except for the VPA, is not correct. The EIS (EMM 2019) and Amendment Report (EMM 2020b) describe a suite of both avoidance measures incorporated into the project design, and mitigation measures specifically developed to mitigate the residual impacts on the local community, that Regis is committed to implementing. The avoidance and mitigation of impacts to near neighbours has been a focus of Regis from the start of project planning and design.

In relation to avoidance, the EIS and Amendment Report outline the iterative design process undertaken by Regis to specifically avoid impacts to near neighbours. Most notably was the incorporation of the pit and southern amenity bunds into the project design, and the development of the construction schedule of this bund and the waste rock emplacement to reduce predicted noise levels at Kings Plains.

As described in Section 6.5 of the EIS, preliminary noise modelling was undertaken to predict noise levels at surrounding residences associated with the initial mine design and waste rock emplacement schedule and the use of standard equipment. Early calculations identified that noise emissions had the potential to significantly exceed noise criteria for sensitive receptors residing in the Kings Plains locality.

As a result, several changes to the project design and the incorporation of mitigation measures were considered to achieve a feasible and effective noise reduction from the mine development.

Analysis of initial noise predictions showed that the significant contributors to noise levels in Kings Plains were the construction of the waste rock emplacement and the movement of haul trucks, particularly as they exit the open cut pit. Subsequently, significant work was undertaken to redesign the construction of the waste rock emplacement to minimise noise levels on the residents in Kings Plains. The initial design that was considered involved constructing the northern end of the emplacement first and dumping waste rock progressively south. Whilst this was an efficient way to construct the emplacement particularly in terms of haulage distances, the lack of shielding of equipment in this design meant noise emissions would easily propagate south towards Kings Plains.

The emplacement schedule was then re-configured so that dumping of waste rock would commence in the south, building the southern face of the bund first (ie the 'southern amenity bund' shown in Figure 2.1 of the EIS) and as quickly as possible so that this could act as a bund behind which equipment could work as the dump progresses north throughout the rest of the mine life. A second amenity bund was then added to the design immediately south of the pit exit point to shield the noise from trucks exiting the pit (the 'pit amenity bund', as shown in Figure 2.1 of the EIS).

The construction of these two amenity bunds in the initial stages of the mine development resulted in significant improvements to the predicted noise levels at the nearest sensitive receivers, particularly after the bunds were constructed (from about Year 3 onwards). The bunds also served the dual purpose of providing an effective visual barrier of active mining operations to the residents of Kings Plains.

Following the public exhibition of the EIS, further amendments were made to the project, again to further avoid and/or reduce impacts to near neighbours. The amendments that have reduced impacts on the residents in Kings Plains are described in detail in the Amendment Report (EMM 2020b) and are summarised below:

- **Construction schedule** - the careful scheduling of activity in the initial stages of the project so that works on the main structures at the southern end of the mine development project area (such as the water management facilities (WMFs) and the pit amenity bund) will be undertaken generally in sequence rather than in parallel to avoid a high concentration of activity in areas closest to receivers.
- **Mine and waste rock emplacement schedule** – revision of the mine schedule and the subsequent construction sequence of the waste rock emplacement was undertaken, in consideration of predicted noise levels in Kings Plains. The revision to the schedule reduced early activity (and therefore, noise generation) in the southern end of the mine development project area near Kings Plains while extending the construction timeframe for the southern amenity bund to maintain these reduced noise levels.
- **Open cut design and exit ramps** – the open cut pit design was further optimised and the location of the primary exit ramps for haul trucks was altered, which reduced predicted noise emissions for neighbouring properties.
- **Pit amenity bund** – the optimisation of the open cut pit design and the improved location of the primary exit ramps for haul trucks allowed the size of the pit amenity bund to be reduced, reducing the extent of visual amenity changes associated with this bund.
- **Equipment** – the utilisation of equipment with reduced noise output was incorporated into the mine schedule, particularly in the southern end of the mine development project area.
- **Site access** – a new location for the site access intersection off the Mid Western Highway was identified, approximately 1 km east of the original location assessed in the EIS, in response to feedback from Transport for NSW (TfNSW) and the community. This change reduced the predicted noise levels at the nearest residential property adjacent to the original location.

- **Mine administration and infrastructure area** – the layout of this area was revised and optimised to further integrate into the surrounding natural topographical shielding in the area, reducing its visibility.

In relation to noise, the outcome of these design measures is that the daytime noise levels associated with the project are expected to comply with criteria at all receivers throughout the life of the mine, including all residents in Kings Plains.

Further, noise levels during evening and night time periods are predicted to be below the relevant criteria for all residences except for some minor exceedances of up to 2 dB at some receivers in Kings Plains during Year 1 and Year 4. Levels are predicted to exceed criteria by up to 3 dB for a period in Year 1 at only one property, (R28a) where there is development approval to build a residence. Notably, since submission of the Amendment Report, Regis has purchased R28a.

Notwithstanding the significant improvements in predicted noise levels achieved through avoidance by design, Regis remains committed to implementing negotiated agreements with identified landholders in Kings Plains. As described previously in this response, and in Section 5.2.1 of the Amendment Report, these negotiated agreements included tailored mitigation plans for individual properties.

As described in Section 6.6 of the Amendment Report, the changes made to the mine design for which approval is sought, primarily to reduce noise impacts, also further improved the predicted air quality outcomes. The predicted concentrations and deposition rates for particulate matter and gaseous pollutants are below the applicable impact assessment criteria at near neighbours for all assessed stages of the mine development.

Once all avoidance measures were incorporated into the project design, a range of mitigation measures were identified to further manage and mitigate residual impacts to near neighbours. The updated summary of commitments provided in Appendix C of the Amendment Report outlines the mitigation measures which Regis are committed to implementing to further reduce the residual impact of the project, particularly on near neighbours. These measures include mitigation measures relating to noise, blasting, air quality, water resources and visual amenity.

In relation to addressing the potential for distributive inequality for other groups in the regions, such as lower income households, it is noted that the flow-on economic benefits of the project, which will be significant, will benefit the community as a whole in Blayney. The funding of community infrastructure projects through the VPA, which has been executed between Regis and BSC, will also benefit the broader Blayney community. In addition, there will be employment opportunities open to the community, along with training and skill development programs.

The issue of intergenerational equity was addressed in detail in Section 37.7.2 of the EIS. As described, some impacts on natural resources will occur as a result of the project, primarily through the removal of native vegetation. However, a biodiversity offset strategy has been developed for the project, and once implemented, will mean a net beneficial gain in biological resources to benefit future generations. A key part of this strategy is establishing a stewardship agreement over a property which Regis has already purchased to effectively offset the biodiversity impacts of the project.

The only beneficial land use that could be affected by the project is agriculture. In this regard, the agricultural capability of the land to be disturbed will be progressively reinstated so that, except for the final void, the project area can be used for agriculture at the end of the mine life. After production ceases, the pipeline development could remain in place and in doing so would remain a valuable infrastructure asset and enhance water security for future generations in the wider Central West region.

A natural resource that will be lost as a result of the project is the in-situ gold. On average, 200,000 ounces and up to 250,000 ounces per annum of product gold will be removed over the mine operating life. Gold is a recyclable metal that can be reused for generations. Further, the

revenue generated by the project will be used to employ and up-skill the mine workforce and provide more community facilities and other social infrastructure, mainly through the VPA. This will allow natural capital (gold) to be transformed into economic capital (greater personal and public income), social capital (better public facilities) and human capital (a more skilled and wealthier workforce).

## 8. Accommodation

The SIA has identified the potential accommodation shortages in the Blayney LGA to meet demands of the project and potential impacts which include:

- increased demand for short term accommodation by the construction workforce, which presents challenges for competing local industry and businesses
- workforce accommodation demands reducing accessibility and affordability to private housing for existing and future residents
- increased pressure upon local services, facilities and infrastructure
- displacing lower income households and loss of social diversity

The SIA and SIA Addendum includes the proposed Workforce Accommodation Management Framework which includes objectives to address some of these issues. However further detail is required about the proposed performance criteria from Regis against which the implementation of this strategy can be assessed. Please also provide further discussion about strategies Regis is considering to address the potential issue of insufficient accommodation for workers.

The SIMP to be developed for the project will include a detailed framework for monitoring accommodation availability and performance criteria against which measures implemented will be assessed.

In relation to addressing the potential for accommodation shortages in the local region, Regis continues to encourage and support expansion of accommodation in the area. A notable development in the future availability of accommodation in Blayney is the recent approval of the Blayney Bowling Club re-development by BSC. This development involves the construction of hotel style accommodation at the bowling club site, which is currently closed and not in use. The development will provide accommodation for approximately 90 people in stage 1, and a further 40 in stage 2.

It is acknowledged that this one development will not fully address the anticipated accommodation demands of the project; however, it is a significant step towards contributing to an increase in short-term accommodation availability in Blayney. While the SIA (Hansen Bailey 2019) acknowledged that not all accommodation needs of the project could be met in Blayney, it identified that there is a large number of accommodation options available to meet the demand in the broader region and particularly in the regional centres of Orange and Bathurst, which are both within a one-hour commute of the mine.

Specifically, the SIA identified there are more than 1,000 rooms of short-term accommodation available in Orange and Bathurst, with occupation rates of around 70% and 55% respectively. This indicates that the Orange and Bathurst LGAs have capacity to accommodate a significant portion of the construction workforce for the project. The SIA also found that there is ample supply of housing in these broader LGAs to accommodate the predicted operational workforce demands.

The SIMP will further describe measures to meet accommodation demands utilising availability in the region. As described in the response above, Regis will also work with Orange360 to monitor accommodation availability. Details on Orange360 are provided below.



## 9. Local labour draw

The SIA (p.22) notes that approximately 60% (367 workers) of the total construction workforce for the mine development and 20% (24) of the pipeline construction workforce is anticipated to be local hires, which may result in labour draw from existing local employers. Please clarify the statement made in the SIA (s 6.2.9) that Regis will “monitor local labour supply and adjust local labour recruitment practices and rates accordingly”.
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Regis are part of a group facilitated by Orange360, which monitors accommodation availability and employment in the region. Orange360 is a regional tourism initiative, formed by BSC in partnership with Orange City Council and Cabonne Council, to market the regional area and grow the tourism industry. Involvement in this group by Regis will provide an effective means of monitoring labour supply. Regis also meets regularly with major employers in the area, as well as training providers and council. This engagement will continue throughout the life of the project and will provide an effective means of collaboratively monitoring and addressing any issues with labour supply or accommodation availability if they arise.

The SIMP for the project will further describe a detailed framework for monitoring local labour supply and adjusting recruitment practices accordingly.

## 10. Closing

If you require any further detail or wish to discuss the information provided, please do not hesitate to contact either Danielle Wallace ([dwallace@regisresources.com](mailto:dwallace@regisresources.com)) or Andrew Wannan ([awannan@regisresources.com](mailto:awannan@regisresources.com)).

Yours sincerely



**Tony McPaul**  
Manager – Special Projects  
Regis Resources Ltd

## **References**

EMM Consulting 2019, *McPhillamys Gold Project Environmental Impact Statement*, Prepared for LFB Resources NL.

EMM Consulting 2020a, *McPhillamys Gold Project Submissions Report*, Prepared for LFB Resources NL.

EMM Consulting 2020b *McPhillamys Gold Project Amendment Report*, Prepared for LFB Resources NL.

Hansen Bailey 2019 *McPhillamys Gold Project Social Impact Assessment*, Prepared for LFB Resources NL.

Hansen Bailey 2020, *McPhillamys Gold Project Social Impact Assessment Amended Project Report*, prepared for Regis by Hansen Bailey.

Landskape 2019, *Aboriginal and Historical Cultural Heritage Assessment*, Prepared for LFB Resources NL.

Landskape 2020, *Addendum to the Aboriginal and Historical Cultural Heritage Assessment*, Prepared for LFB Resources NL.

NSW Government 2018, *Voluntary Land Acquisition and Mitigation Policy*.

OzArk Environment & Heritage 2019, *Aboriginal Cultural Heritage & Historic Heritage Report, McPhillamys Gold Project: Pipeline development*,

OzArk Environment & Heritage 2020, *Addendum Aboriginal Cultural Heritage & Historic Heritage Report, McPhillamys Gold Project: Mine Access Road and Pipeline Options*,

30 November 2021

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**Re: McPhillamys Gold Project (SSD 9505) – Response to minor RFI dated 24-08-2021**

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Dear Steve,

This letter provides a response to the request for information (RFI) from the NSW Department of Planning, Industry and Environment (DPIE), dated 24 August 2021, in relation to the Social Impact Assessment (SIA) of the McPhillamys Gold Project (the project). Each request is reproduced in the box and a response provided below.

**1. Impacts due to displacement associated with the voluntary acquisition of properties in Kings Plains**

Regis has advised the Department that it has progressed negotiated agreements with 17 of the affected landowners in Kings Plains, which includes an option for the landowner to voluntarily request that Regis purchase their property at any time within 10 years from the date when the board of directors makes its final decision to proceed with the project. The consequences of this acquisition and subsequent relocation of residents from the area may cause negative social impacts on the remaining community of Kings Plains which require adaptive management. Please provide some consideration of these impacts and discuss measures that Regis would consider implementing if required to mitigate these impacts.
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Firstly, as described in the Submissions Report (EMM 2020a), it is noted that the noise and air quality models developed for the project do not predict any properties will experience noise or dust levels that trigger the requirement for acquisition set out in the *Voluntary Land Acquisition and Mitigation Policy* (VLAMP) (NSW Government 2018). In fact, the levels are well below. Predicted noise and dust levels are also below the triggers in the VLAMP for mitigation requirements at all privately owned properties. The Submissions Report reported that one property (R28a), was predicted to experience levels of up to 3 decibels (dB) above the relevant noise criteria for a short period in Year 1 of the project, triggering the application of voluntary mitigation rights for that property. Since completion of the Submissions Report, Regis has purchased this property.

Notwithstanding the fact that predicted levels are below the triggers for mitigation and acquisition rights specified in the VLAMP, to effectively mitigate residual air, noise and visual amenity impacts and minimise the risk of outmigration of residents from Kings Plains, Regis has committed to, and is in the process of, negotiating agreements with landholders in Kings Plains, which include tailored landscape and mitigation plans for their individual properties.

As described in the Submissions Report (EMM 2020a), 20 agreements are being progressed, and Regis has continued to progress these agreements with landholders since the lodgement of the Submissions Report in September 2020. At the time of writing this response, 19 of the 20

agreements have now been provided to landholders, which include tailored landscape plans where the landholder has requested such plans. Regis worked collaboratively with the landholders on these plans. As noted above, Regis has now purchased one of these properties and is progressing a purchase agreement with the final landholder.

As noted by DPIE, Regis is also going a step further in the negotiation of these agreements by including a clause in the majority (i.e. 18 of the 20 agreements) that states landowners may request Regis purchase their property at any time within ten years from the date that development consent is granted (provided the consent remains in force), and the Regis Board approves the project.

While the negotiated agreements contain an acquisition clause, a key focus of the agreements are the property specific-management and mitigation plans developed in agreement with individual landowners. The purpose of the mitigation plans is to implement effective measures to mitigate residual air quality, noise and visual impacts of the project, specific to each individual property, such that the impacts are mitigated to an acceptable level, with the ultimate outcome of residents staying in Kings Plains. As described in the SIA (Hansen Bailey 2019), to further minimise the risk of outmigration from Kings Plains, Regis is also committed to demonstrating to the community an ability to develop the mine and comply with all regulatory requirements.

If a property owner were to take up the acquisition offer and sell their property to Regis, Regis will seek to make the property available for rent to existing residents in the Blayney local government area (LGA) and the incoming workforce, as is the case with the other properties owned by Regis. Therefore, acquisition would not likely result in a population change in Kings Plains.

Further, as stated in the Environmental Impact Statement (EIS) (EMM 2019) and Amendment Report (EMM 2020b) for the project, Regis will prepare a Social Impact Management Plan (SIMP) post-determination. The SIMP will outline the process Regis will undertake to monitor if there are negative social impacts of residents moving from Kings Plains, if property owners take up the acquisition offer for their property. If impacts are identified, the SIMP will also describe the adaptive management process Regis will implement to identify whether any further measures are needed to mitigate these impacts, and the process for developing such measures, which will be undertaken in consultation with the residents of Kings Plains. The review and adaptive management process will consider the objectives of the SIMP, whether the objectives are being met, and therefore whether further mitigation and management measures are needed. It will therefore be an ongoing process, with the measures identified adapted to the needs and wants of the Kings Plains residents.

The Department understands that Regis has engaged the services of Gary West to assist with its discussions with these landowners. Can Regis describe the progress of these discussions, the steps taken and provide information (that can be made publicly available) to demonstrate how these discussions have been transparent, fair and reasonable.
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A number of residents in Kings Plains have engaged the services of Mr Warwick Giblin of OzEnvironmental to negotiate on their behalf in the process of negotiating agreements with Regis. Regis subsequently engaged Mr Gary West to facilitate a meeting with Mr Giblin and the group he represents. Mr Giblin represents less than half of the landowners with which Regis are currently negotiating agreements. Negotiations are well progressed with the remaining landholders.

A meeting was planned to be held in Blayney between Mr Giblin and Regis earlier this year. Mr West was to facilitate this meeting; however, Covid-19 restrictions at the time of the planned meeting prevented it from being held in person. Regis offered to hold the meeting by video conference, but Mr Giblin declined the offer and the meeting was delayed until the meeting could be held in person. Regardless, Regis continued to issue and negotiate agreements to landholders.

The meeting between Mr Giblin and Regis was held at the Blayney Community Centre on 7 November 2021, once Covid-19 restrictions allowed. This meeting was facilitated by Mr West and attended by eight landholders. During the meeting, Mr West noted the difficulties around achieving a standard agreement across all landholders as the impacts at each landholder's residence would vary. Notwithstanding, Mr West discussed key aspects of the draft agreements with the landowners present.

In relation to the process of developing the agreements and mitigation measures for each property, the measures have been divided into stage one and stage two mitigation. Once agreement is reached between Regis and a landholder, stage one measures are implemented, which primarily involve implementing vegetation screening plans developed in consultation with the landowner. It is noted however that Regis has implemented State 1 mitigation measures at a number of properties prior to agreements being signed as a gesture of good will. Stage two measures will be implemented if development consent is granted for the project, and prior to mining operations commencing. In addition to the stage one and two measures, the agreements also include a commitment by Regis to contribute to the electricity costs associated with the operation of air conditioning or contribute to the installation of solar panels.

It is also noted that at the time of completing the Submissions Report (EMM 2020a), 15 of the 20 draft agreements included a voluntary acquisition clause. As a result of ongoing negotiation with landholders, 18 of the agreements now include this acquisition clause. Further, Regis has increased the timeframe for acquisition from that originally offered (5 years) to 10 years, following discussions with landholders. This increase in the time period for which acquisition can be requested of Regis was requested by two landholders. To ensure transparency and equity for all landholders involved in negotiating agreements, the increased time period was added to all agreements by Regis. While some parts of the agreement are standardised, they have been tailored to individual circumstances.

Further, as described above, the implementation of agreements with an acquisition upon request clause is above and beyond what is required by government policy (ie VLAMP), demonstrating Regis's commitment to work collaboratively, fairly, and in accordance with best practice with the Kings Plains community.

## 2. Cultural impacts

The SIA and SIA Addendum Reports do not propose specific mitigation measures relating to cultural loss other than to "manage impacts to amenity; undertake progressive rehabilitation; support the participation of near neighbours in aspects of rehabilitation and mine closure planning, etc." (6.3.3 on p.167 of the SIA). Provide further detail about how proposed measures not discussed in the SIA address these issues and/or consider what additional mitigation measures can be implemented to manage impacts on cultural values, the rural way of life and sense of place for the community as a result of the project.
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### Cultural values

As described in the EIS for the project (EMM 2019), land within the project area has been extensively modified by agricultural land uses including cropping and grazing, historical mining activities and construction of roads and utilities.

A number of Aboriginal heritage sites were identified within the mine project area, comprising small scatters or isolated finds of stone artefacts. The Aboriginal Cultural Heritage Assessments prepared for the project (Landskape 2019, Landskape 2020, OzArk 2019 and OzArk 2020) found that up to 30 Aboriginal heritage sites will be impacted by the mine development (27 directly impacted and three indirectly impacted), and a total of seven Aboriginal sites will be disturbed by the pipeline route if the northern alignment is constructed, and eight if the southern option is constructed.

Importantly, Landsape (2019) noted that although the sites in the project area are representative of a region wide distribution of Aboriginal occupation sites, they hold low scientific significance and are significantly disturbed, consistent with the historical agricultural land use of the area. Considering this, the mine development and subsequent impacts on identified sites will not cause cumulative impacts to the region's Aboriginal cultural heritage value.

Further, as reported in Section 7.1.2 of the Aboriginal Cultural Heritage Assessment (Landsape 2019), the RAPs did not identify any high spiritual, traditional, historical, or contemporary associations with the archaeological sites identified in the project area.

Notwithstanding, Regis has committed to a range of measures to effectively mitigate impacts to Aboriginal cultural heritage as a result of the project. All sites identified within the disturbance footprint of the project will be salvaged prior to land disturbance, in collaboration with the Registered Aboriginal Parties (RAPs). A keeping place for salvaged artefacts will be determined as part of the development of the Cultural Heritage Management Plan (CHMP) and in consultation with RAPs and Heritage NSW.

As described in Section 3.3.4 of the SIA Addendum prepared for the project (Hansen Bailey 2020, Appendix S of the Amendment Report (EMM 2020b)), Regis is committed to involving the local Aboriginal community as integral participants in the management of Aboriginal cultural heritage values in the mine project area. Regis will continue to involve the RAPs and other relevant Aboriginal community groups or members in matters pertaining to the mine development. Further to the management of specific sites, the following mitigation and management measures will therefore be implemented to ensure the appropriate management of Aboriginal cultural heritage within the project area:

- invitation for the continued participation of RAPs; in particular for the recording, collection, curation, storage and replacement of artefacts;
- provision of cultural awareness training for site personnel, likely through the site induction process;
- the preparation of a CHMP, which will guide the mitigation and management of sites in the project area and help to avoid inadvertent impacts. The CHMP will also outline the protocol for unanticipated finds such as artefacts and skeletal remains; and
- Regis will consult with the Orange Local Aboriginal Land Council (OALC) regarding the commission of a social and cultural mapping study with relevant traditional owners for the project area.

Consultation has been ongoing with the RAPs and OALC regarding proposed mitigation and future management options relating to cultural heritage.

#### Rural way of life and sense of place

The SIA (Hansen Bailey 2019) acknowledged that the project has the potential to adversely impact rural values in the Kings Plains locality. The rural way of life in the area is characterised by the presence of rural vistas, livestock (cattle) grazing, outdoor activities including equine activities and close social connections between residents.

As all mining activity would be undertaken on land owned by Regis, there is no potential for the project to have direct impacts on rural farming practices. However, the EIS and SIA acknowledged that the project will alter rural vistas immediately adjacent to the mine development area in Kings Plains. Regis has therefore committed to a range of measures to reduce and mitigate this impact. Firstly, the project design has been carefully considered to manage the potential visual impacts of the project, including the following:

- the processing plant and mine infrastructure areas have been sited to maximise the separation of these project elements and sensitive receivers and to take advantage of existing topography that will screen these elements;

- the open cut pit and southern amenity bunds will be developed as a priority to screen development of open cut, infrastructure and haul roads at early stage of mine development;
- the waste rock emplacement staging will be refined to create progressive minor screening bunds;
- micro-topographic design will be incorporated into the final landform;
- property acquisition has been undertaken to provide a substantial buffer in some directions between the proposed mine infrastructure and nearby residences; and
- progressive rehabilitation will be undertaken throughout the mine life. At the end of mining, mine infrastructure will be decommissioned, and disturbed areas will be rehabilitated to integrate with natural landforms as far as practicable. The final landform, apart from the final void, will support land uses similar to current land uses or land uses consistent with land use strategies for the Blayney and Cabonne LGAs.

Secondly, as described above, residences in Kings Plains will receive residential landscape mitigation treatments to screen or mitigate views of the mine development. Regis are committed to, and are actively negotiating, agreements with landholders which include these tailored mitigation plans for residents. As outlined above, Regis has commenced tree planting at a number of properties prior to these agreements being signed as a gesture of good will. Regis has also actively planted trees along Guyong Road to meet the commitment outlined in the Amendment Report (2020b) for visual mitigation and has implemented a “free trees to residents program” in 2021 which has planted 1030 trees in total across Kings Plains, Guyong Rd and Vittoria Road.

Further, as described in the SIA (Hansen Bailey 2019), the project has the potential to benefit rural landowners in the region through the provision of employment opportunities as a supplement to existing rural employment, and through service capacity improvements in the Kings Plains rural fire brigade and the Canobolas Zone rural fire service. Regis will also provide the opportunity for part-time employment at the mine. This will enable people who live on rural properties to combine employment off-farm with working on the land, facilitating a continuation of a rural way of life.

### 3. Impacts of stress and anxiety

In the SIA and section 5.5.4 of the Submissions Report, Regis proposes to manage resident stress and anxiety in relation to the project by implementing the Stakeholder Engagement Framework, which includes engaging and maintaining “transparent, evidence based and ongoing dialogue with concerned property owners and other community members”. Consider further measures about when to engage / empower the community to build trust and reduce stress and outrage and how to verify the effectiveness of these measures.
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#### Stakeholder engagement

As noted in the Department’s request for further information and described in the Submissions Report (EMM 2020a), the primary way in which Regis proposes to manage and reduce the potential for stress and anxiety in the community is for the company to actively engage with concerned property owners and other community members. The primary purpose of this engagement is to ensure community members remain informed about the project, thereby reducing uncertainty and the associated stress and anxiety. Regis engages with the community in a number of ways and is committed to continuing this engagement throughout all phases of the project, from construction to operation and rehabilitation and closure. Methods of engagement and communication include:

- **Project website** – the website is regularly updated by the Regis team to provide an up-to-date source of information for the community.
- **Newspaper articles** - fortnightly articles on the project are published in the Blayney Chronicle.

- **Community consultative committee (CCC)** – The CCC was established for the project in August 2018 and has facilitated opportunities for community participation in the project. The CCC generally meets every two to three months and minutes from these meetings are published on the project website (<https://www.mcphillamysgold.com/>). Regular meetings of the CCC have continued since the submission of the Amendment Report and Submissions Report, with the latest one held in August 2021.
- **Newsletters** - newsletters and project updates are regularly sent via email to the project community email distribution list (which includes over 1,000 contacts).
- **Community relations team** – This team is available to discuss the project at the McPhillamys Gold Project office in Blayney. Regis opened their local office in Blayney in 2013, where Regis staff are available to discuss the project with the community.
- **Landholder discussions** – Discussions are ongoing with the broader landholders in the project area surrounds, including the 20 landowners in Kings Plains with whom Regis is in the process of negotiating agreements. Regis has been actively engaging with landholders to develop tailored mitigation plans for their property.

The Stakeholder Engagement Framework for the project will be further developed as part of the Social Impact Management Plan. This framework will outline the tools and timing of engagement, to ensure that engagement is undertaken in such a way to build trust with the community.

The inclusion of the clause stating that landowners can request Regis purchase their property in the agreements with Kings Plains residents also primarily seeks to respond to the anxiety expressed by landowners in relation to the uncertainty about how future impacts may be experienced, particularly impacts to property values, and impacts to way of life and the use and enjoyment of their private property.

#### Community sentiment survey – findings and outcomes

In addition to the ongoing engagement activities described above, Regis undertook a community sentiment survey earlier this year across the Blayney, Cabonne, Bathurst and Orange LGAs to gain an understanding of community views and concerns relating to the project and to inform future community engagement activities.

The survey was conducted by Newgate Research in April and May 2021. The research methodology employed by Newgate Research comprised the following:

1. a qualitative program involving six two-hour focus groups with a total of 51 members of the local community near the mine development project area; and
2. a combined telephone and online survey with a total of 405 participants across the Blayney, Cabonne, Bathurst and Orange LGAs.

Participants of the focus groups were recruited by a reputable qualitative participant recruitment organisation, Country Opinions, and were recruited to be broadly representative of the community with a balance male and females of different ages, life stages, working status and cultural background. Similarly, participants of the online and telephone survey were sourced by a professional market research panel, with a balance of gender, age and location. All participants were aged 18 years and over.

The results of the survey showed broad community support for the project, and notably, when provided with more information about the project, the level of positive responses from the community increased. Overall, when informed about the project, 73% of participants stated they felt positive towards the project, and 85% of participants agreed that the project will specifically benefit the Central West region through an economic boost and increased job opportunities. One in five agreed that the project will benefit them personally.



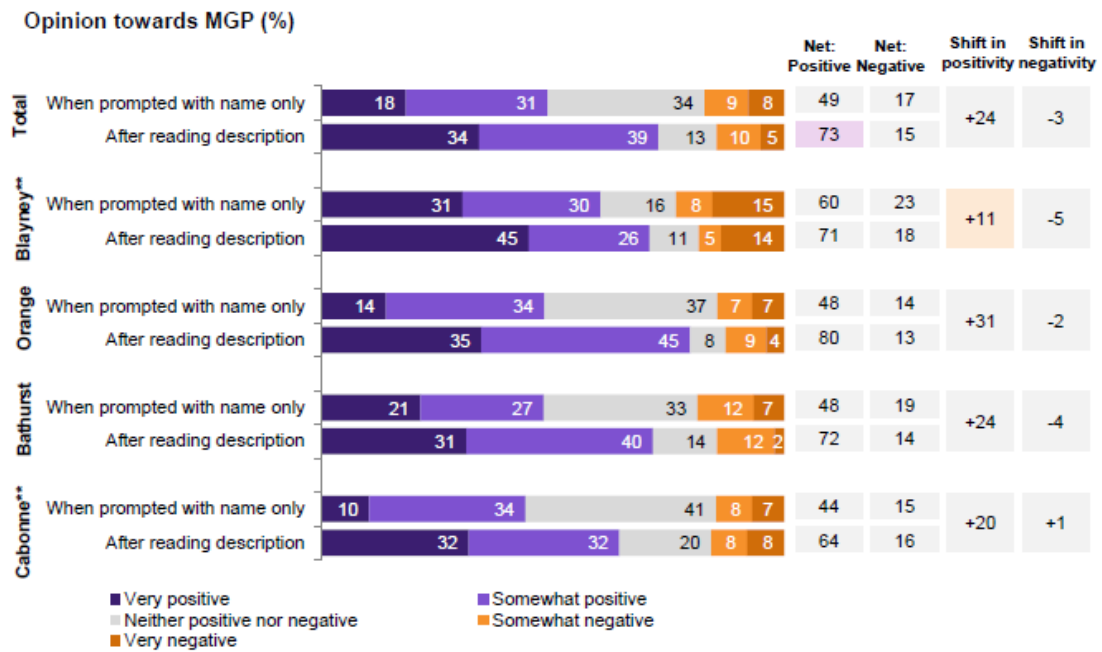
At the start of the survey and group sessions, initial open-ended questions were asked of participants to gain an understanding of the current local issues of importance and concern to the community. The answers revealed that insufficient maintenance of roads and lack of health services and job opportunities are the top issues of concern. The potential of a gold mine being built was a lower order issue by far compared to these issues, with only five participants (1%) mentioning the proposed project, all of whom reside in the Blayney LGA. Mining in general was only mentioned by one participant.

Questions were then asked about general attitudes towards mining and the mining industry, followed by questions relating specifically to the project, including awareness of the project, unprompted opinions on the project, and informed perceptions of the project.

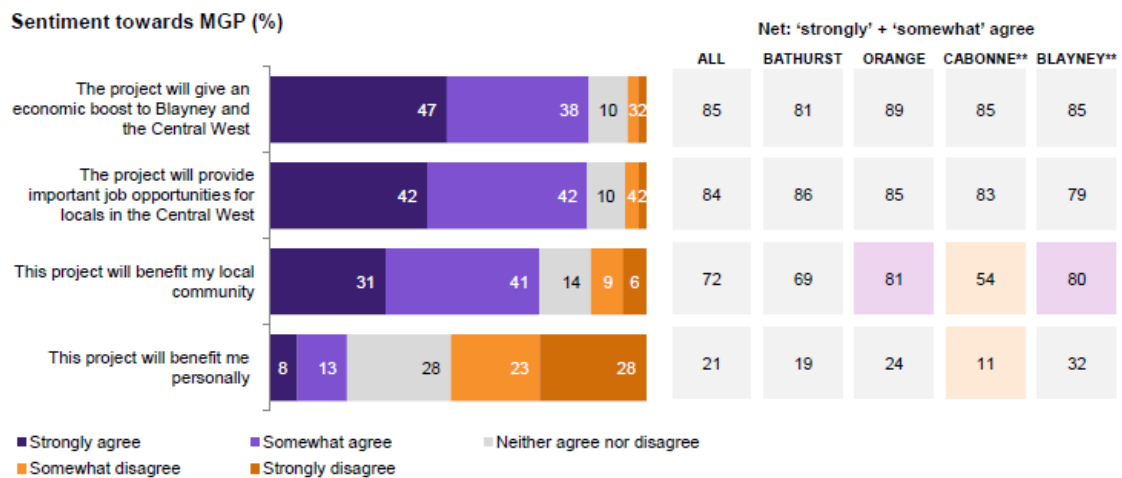
Key findings can be summarised as follows:

- General attitudes towards mining:
  - Close to six in ten participants (58%) felt positive towards mining, with support for the industry significantly higher in Orange (68%) compared to all other LGAs. Of the participants from Blayney, 59% felt positive about mining, while 19% stated they felt neither positive or negative, and 22% indicated a negative sentiment towards the industry.
- Awareness of the project:
  - The survey results revealed a very high level of awareness about the project in the Blayney LGA, and a significantly higher levels of awareness than those in other LGAs, with 91% of participants from Blayney being aware of the project. Overall, just over half of all participants were aware of the project.
- Unprompted opinions of the project:
  - When asked about the project based on their existing knowledge, approximately half (49%) of all participants felt positively towards the project, with 34% feeling neutral and 17% having a negative opinion of the project. Variations by LGA were not statistically significant. The 49% who rated the project positively stated that this was driven by employment opportunities (55%), economic benefits (25%) and general feelings of support for the project (25%).
- Informed perceptions of the project:
  - When shown information about the project, 24% of participants became more positive towards the project, bringing the overall positivity score to 73%, including 71% in the Blayney LGA. There was a slight shift in negativity with 2% becoming less negative towards it, resulting in 15% of all participants indicating they were either 'somewhat' or 'very' negative about the project, including 18% in Blayney LGA. These results are illustrated in Figure 1 and Figure 2 below.

The survey also asked participants about their preferred communication channels, so that Regis can tailor engagement to best meet the community's wants and needs. The results of the survey showed most support for an up-to-date website (73%), community or public meetings (65%), and newsletters in central locations (66%), inserted in local newspapers (62%) or delivered to homes (59%), with preferences within Blayney reflecting those of the Central West more broadly. As described above, Regis currently employs these methods of communication, and will continue to do so.



**Figure 1 – Opinion towards the project**



**Figure 2 - Sentiment towards the project**

#### 4. Local services

The SIA identified the potential impacts on local services due to an increased construction workforce and reduced availability of these services for the community. These impacts include:

- Police: “a noticeable gap in service provision” p. D-19 Table 10 of the SIA.
- “There is a risk of limited health service access and potential for poorer health outcomes in Blayney if there is a significant increase in permanent population and in the instance where the medical service is not able to increase capacity” p.D-19 Table 10 of the SIA.
- “increased demand and limited capacity for identified vulnerable groups within the social housing, medical and aged care sectors: P.D-21 Table 11 of the SIA.

The SIA also notes the local social support services and community groups however does not indicate the availability of services relating to issues such as domestic violence, gambling and women’s shelters.

Please provide some discussion of how Regis propose to support the provision of local services to help address the concerns identified in the SIA and those not considered (such as domestic violence, gambling and women’s shelters).

The quotes provided in the request for additional information from DPIE are from Appendix D of the SIA (Hansen Bailey 2019). Appendix D documents comments raised during interviews with stakeholders about the project. These quotes are suggestions from emergency service providers interviewed during the preparation of the SIA; they are not the findings of the SIA.

Notwithstanding, the SIA considers the potential impact to access to services and facilities, which is addressed in Section 6.2.8. In fact, one of the purposes of the SIA is to identify potential gaps in the provision of local and State funded services in a local area, including policing, so that the appropriate levels of government can allocate resources to fill these gaps, in addition to measures put forward by the proponent as discussed below.

The SIA acknowledges the additional demands that the project will place on existing services and facilities; however, it also notes that local investment facilitated through the project (such as through the Voluntary Planning Agreement (VPA) with Blayney Shire Council (BSC)) will support improvements in, and the possible expansion of, services in the Blayney LGA.

Notably, since submission of the Submissions Report (EMM 2020a) and the Project Amendment Report (EMM 2020b) to DPIE, Regis and BSC have entered into the VPA, which was executed on 15 February 2021. As part of the VPA, Regis will pay an upfront monetary contribution to BSC and then an ongoing payment on an annual basis. BSC are bound to use the funds received for, or towards, a public purpose for local community infrastructure projects that benefit social, sporting/recreation, environmental, economic and public amenity that are consistent with the Blayney Shire Community Strategic Plan.

In relation to questions raised as to how the funding via the VPA will specifically benefit Kings Plains, it is noted that the Kings Plains settlement is part of the broader Blayney community. The settlement comprises mostly small acreages and lifestyle blocks approximately 7 km from the centre of Blayney. Being an outer area of Blayney, the Kings Plains residents rely on the community infrastructure and services (such as health and education) of Blayney. Therefore, the fact that BSC is bound to use the funds for or towards “a *public purpose for local community infrastructure projects*” means that these funds will also benefit the residents of Kings Plains.

Further to this, if the project is approved, part of Dungeon Road will be closed and sold by BSC. While the proceeds of the sale of Dungeon Road are untied and sit outside of the VPA, at the ordinary council meeting on 15 February 2021, BSC agreed in principle that these funds should be allocated to roads around the Walkom Road, Village Road, Guyong Road and Vittoria Road areas (ie around the Kings Plains locality), thus providing a further benefit to the residents of Kings

Plains. It is also noted that the economic benefits of the project to the local community and more broadly to the State of NSW will be significant. As reported in the Amendment Report (EMM 2020b), the net social benefit of the project is estimated to be \$244 million present value (at 7% discount rate) (\$336 million with employment benefits included). The economic benefit of the project includes taxes and royalties that will be paid to the State and can also be used to address identified gaps in service provision.

Further to the VPA, the SIA listed the following strategies proposed by Regis to reduce the impact of the construction and operational phase workforce on services provision in the Blayney LGA, and to ensure existing residents have ongoing access to these services:

- project on-boarding should ensure that construction phase personnel are:
  - adequately informed of the range and capacity of health services available in Blayney LGA, service opening hours, and the correct action to take in an emergency and non-emergency situation; and
  - aware of the need to take care of routine health requirements in their home communities and mitigate demands on local services;
- early discussions between Regis and local health and emergency services during the project start-up phase to help ensure that project demand is anticipated, and potential impacts are appropriately managed in agreement with service providers;
- development of ongoing consultative arrangements between Regis and Chifley Police Local Area Command to ensure relationships are in place to support emergency responses; and
- ongoing communication with Regis, Blayney Multipurpose Health Service (MPHS), the Blayney Health Council and Blayney emergency service providers to monitor demand and anticipate and respond to changes in the cumulative context (as necessary).

This ongoing communication and engagement with local service providers committed to by Regis will assist in monitoring demand for a wide variety of community services, including the services raised by DPIE relating to domestic violence, gambling and women's shelters. The process for this engagement will be outlined in the Social Impact Management Plan (SIMP) to be developed for the project.

An example of how Regis is already working with emergency service providers to help ensure adequate services are maintained is in relation to the Rural Fire Service (RFS) in Blayney. Initial discussions have taken place with the RFS about how additional capability, if required, will best be achieved; for example, by Regis developing internal capacity to respond to emergency events or through the provision of funding to enable the RFS to build on their existing capability.

Further to the above commitments, Regis participates in the Local Emergency Management Committee, and keeps this committee informed of the project status.

## 5. Anti-social behaviour

Concerns were raised about the potential impacts of an influx in mostly male population and issues around anti-social behaviour. The SIA proposes a suite of measures to addressing the potential for antisocial behaviour. Please advise how Regis proposes to monitor the effectiveness of these measures and respond to instances of anti-social behaviour.
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While concerns were raised about potential anti-social behaviour from the incoming mining workforce, no evidence was provided or found to suggest that this would occur. Notwithstanding this, anti-social behaviour by employees and contractors of the project will not be tolerated by Regis. This will be clearly communicated in the induction program that all employees and contractors will have to complete before commencing work on the project.

As described above, a SIMP will be developed and implemented for the project, which will provide a detailed framework for the management, monitoring and reporting of social impacts. Monitoring will enable the effectiveness of the measures to be evaluated, and to be adjusted accordingly, if required.

An example of a social impact management and monitoring measure that addresses anti-social behaviour is becoming party to a liquor accord, which Regis is investigating as part of the development of the SIMP. Liquor accords are partnerships between licensed venues, community members, local businesses, local councils, police, and other community groups that work together to develop practical solutions to address alcohol-related issues, anti-social behaviour, and violence in local areas. A liquor accord is currently in place in both Bathurst and Orange. Regis will work with the parties to the accord to monitor any changes in anti-social behaviour during the construction and operational phase of the project, and to effectively respond to any reported instances of anti-social behaviour identified.

## 6. Hazard and risk

The Department notes that the preliminary hazard analysis concludes that the project does not represent an offensive or hazardous development and ranks the transport and storage of hazardous materials as a medium risk, particularly the risk of a vehicle accident. The PHA notes that the “transport of hazardous goods to the mine site, while posing a conceivable issue for off site members of the public, is expected to be adequately addressed through strict conformance with the Australian Code for the transport of Dangerous Goods.”

The Health Impact Assessment (Submissions Report Appendix E) states under Hazardous Materials p.ES1 that “there are no impacts in the off-site community. This includes the transport, storage and use of a range of dangerous goods, including explosives, cyanide and LPG. Where there are no impacts there are no risks to community health.” Given the potential for off site impacts does exist, this statement is not strictly correct and therefore requires further clarification.

A Preliminary Hazard Analysis (PHA) was prepared for the project (Risk Mentor 2019, Appendix R of the EIS), which was carried out in accordance with the relevant guidelines, policies and industry requirements, including the NSW Department of Planning (now DPIE) publications:

- Hazardous and Offensive Development Application Guidelines – Applying SEPP 33, 2011;
- Assessment Guideline – Multi Level Risk Analysis 2011;
- Hazardous Industries Planning Advisory Paper No 3 Risk Assessment 2011; and
- Hazardous Industries Planning Advisory Paper No 6 Hazard Analysis 2011.

The PHA considered the off-site transport of dangerous goods, noting that all dangerous goods will be transported to the project area in strict compliance with the *Australian Code for the Transport of Dangerous Goods by Road and Rail* (Australian Transport Code). The PHA concluded that transporting goods in this manner effectively manages the transport risk relevant to all dangerous goods transported to the site, as is the case for the transport of dangerous codes all over Australia.

The Health Risk Assessment (HIA) (EnRiskS 2020, Appendix E of the Submissions Report) then considered the *residual* risk to the local community of dangerous goods transport, ie, the risk to the community once the mitigation measures are place. In the case of dangerous goods, this mitigation measure is transport in accordance with the Australian Transport Code, and with this in place, the HIA found that there is no risk to community health. The assertion that this is not correct by DPIE does not recognise that the assessment of risk by both the PHA and HIA considers the appropriate mitigation measure in place.

Regis acknowledges DPIE’s position that the risks relating to the transport of dangerous goods is not completely eliminated by compliance with the Code. However, the PHA found that compliance

with the Code mitigates the risk to an acceptable level, which is what the HIA is referencing when it referred to 'no risk' to the community.

## 7. Distributive equity

Section 4.3.3 (p.52) of the SIA notes that "For some near neighbours there is a sense that the local community is disproportionally carrying the costs of mining and is disadvantaged simply because it is at the centre of the impact". Section 6.2.12 of the SIA discusses distributional and intergenerational equity and notes that the impacts and opportunities of the project may accrue disproportionately throughout the local community. The SIA and Addendum SIA provides no clear discussion about this issue nor do the reports recommend measures with the exception of the VPA to support local community. Please provide discussion about the proposed measures to address potential distributive inequity, and/or provide further measures to address this issue.
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The statement that the SIA (Hansen Bailey 2019) and Addendum SIA (Hansen Bailey (2020) provides no clear discussion on the identified issue that impacts will accrue disproportionately to the local community and does not recommend measures, except for the VPA, is not correct. The EIS (EMM 2019) and Amendment Report (EMM 2020b) describe a suite of both avoidance measures incorporated into the project design, and mitigation measures specifically developed to mitigate the residual impacts on the local community, that Regis is committed to implementing. The avoidance and mitigation of impacts to near neighbours has been a focus of Regis from the start of project planning and design.

In relation to avoidance, the EIS and Amendment Report outline the iterative design process undertaken by Regis to specifically avoid impacts to near neighbours. Most notably was the incorporation of the pit and southern amenity bunds into the project design, and the development of the construction schedule of this bund and the waste rock emplacement to reduce predicted noise levels at Kings Plains.

As described in Section 6.5 of the EIS, preliminary noise modelling was undertaken to predict noise levels at surrounding residences associated with the initial mine design and waste rock emplacement schedule and the use of standard equipment. Early calculations identified that noise emissions had the potential to significantly exceed noise criteria for sensitive receptors residing in the Kings Plains locality.

As a result, several changes to the project design and the incorporation of mitigation measures were considered to achieve a feasible and effective noise reduction from the mine development. Analysis of initial noise predictions showed that the significant contributors to noise levels in Kings Plains were the construction of the waste rock emplacement and the movement of haul trucks, particularly as they exit the open cut pit. Subsequently, significant work was undertaken to redesign the construction of the waste rock emplacement to minimise noise levels on the residents in Kings Plains. The initial design that was considered involved constructing the northern end of the emplacement first and dumping waste rock progressively south. Whilst this was an efficient way to construct the emplacement particularly in terms of haulage distances, the lack of shielding of equipment in this design meant noise emissions would easily propagate south towards Kings Plains.

The emplacement schedule was then re-configured so that dumping of waste rock would commence in the south, building the southern face of the bund first (ie the 'southern amenity bund' shown in Figure 2.1 of the EIS) and as quickly as possible so that this could act as a bund behind which equipment could work as the dump progresses north throughout the rest of the mine life. A second amenity bund was then added to the design immediately south of the pit exit point to shield the noise from trucks exiting the pit (the 'pit amenity bund', as shown in Figure 2.1 of the EIS).

The construction of these two amenity bunds in the initial stages of the mine development resulted in significant improvements to the predicted noise levels at the nearest sensitive receivers,

particularly after the bunds were constructed (from about Year 3 onwards). The bunds also served the dual purpose of providing an effective visual barrier of active mining operations to the residents of Kings Plains.

Following the public exhibition of the EIS, further amendments were made to the project, again to further avoid and/or reduce impacts to near neighbours. The amendments that have reduced impacts on the residents in Kings Plains are described in detail in the Amendment Report (EMM 2020b) and are summarised below:

- **Construction schedule** - the careful scheduling of activity in the initial stages of the project so that works on the main structures at the southern end of the mine development project area (such as the water management facilities (WMFs) and the pit amenity bund) will be undertaken generally in sequence rather than in parallel to avoid a high concentration of activity in areas closest to receivers.
- **Mine and waste rock emplacement schedule** – revision of the mine schedule and the subsequent construction sequence of the waste rock emplacement was undertaken, in consideration of predicted noise levels in Kings Plains. The revision to the schedule reduced early activity (and therefore, noise generation) in the southern end of the mine development project area near Kings Plains while extending the construction timeframe for the southern amenity bund to maintain these reduced noise levels.
- **Open cut design and exit ramps** – the open cut pit design was further optimised and the location of the primary exit ramps for haul trucks was altered, which reduced predicted noise emissions for neighbouring properties.
- **Pit amenity bund** – the optimisation of the open cut pit design and the improved location of the primary exit ramps for haul trucks allowed the size of the pit amenity bund to be reduced, reducing the extent of visual amenity changes associated with this bund.
- **Equipment** – the utilisation of equipment with reduced noise output was incorporated into the mine schedule, particularly in the southern end of the mine development project area.
- **Site access** – a new location for the site access intersection off the Mid Western Highway was identified, approximately 1 km east of the original location assessed in the EIS, in response to feedback from Transport for NSW (TfNSW) and the community. This change reduced the predicted noise levels at the nearest residential property adjacent to the original location.
- **Mine administration and infrastructure area** – the layout of this area was revised and optimised to further integrate into the surrounding natural topographical shielding in the area, reducing its visibility.

In relation to noise, the outcome of these design measures is that the daytime noise levels associated with the project are expected to comply with criteria at all receivers throughout the life of the mine, including all residents in Kings Plains.

Further, noise levels during evening and night time periods are predicted to be below the relevant criteria for all residences except for some minor exceedances of up to 2 dB at some receivers in Kings Plains during Year 1 and Year 4. Levels are predicted to exceed criteria by up to 3 dB for a period in Year 1 at only one property, (R28a) where there is development approval to build a residence. Notably, since submission of the Amendment Report, Regis has purchased R28a.

Notwithstanding the significant improvements in predicted noise levels achieved through avoidance by design, Regis remains committed to implementing negotiated agreements with identified landholders in Kings Plains. As described previously in this response, and in Section 5.2.1 of the Amendment Report, these negotiated agreements included tailored mitigation plans for individual properties.

As described in Section 6.6 of the Amendment Report, the changes made to the mine design for which approval is sought, primarily to reduce noise impacts, also further improved the predicted air quality outcomes. The predicted concentrations and deposition rates for particulate matter and gaseous pollutants are below the applicable impact assessment criteria at near neighbours for all assessed stages of the mine development.

Once all avoidance measures were incorporated into the project design, a range of mitigation measures were identified to further manage and mitigate residual impacts to near neighbours. The updated summary of commitments provided in Appendix C of the Amendment Report outlines the mitigation measures which Regis are committed to implementing to further reduce the residual impact of the project, particularly on near neighbours. These measures include mitigation measures relating to noise, blasting, air quality, water resources and visual amenity.

In addition to the measures already built into the design of the project to minimise impacts to the residents of Kings Plains, Regis has considered other measures to ensure that the Kings Plains community benefit from the Project. As described above in the response to item 4, Regis has entered into a VPA with BSC, under which Regis will pay an upfront monetary contribution to BSC and then an ongoing payment on an annual basis. The BSC is bound to use the VPA funds for or towards a public purpose for local community infrastructure projects. As an outer area of Blayney, the Kings Plains residents rely on the community infrastructure and services in Blayney, and therefore the funds provided by Regis as part of the VPA will also benefit the residents of Kings Plains.

Further to this and again as mentioned above, if the project is approved, part of Dungeon Road will be closed and sold by BSC. Council has agreed in principle that these funds should be allocated to roads around the Walkom Road, Village Road, Guyong Road and Vittoria Road areas (ie around the Kings Plains locality), thus providing another specific benefit to the residents of Kings Plains.

As part of the development of the SIMP for the Project, Regis will consult further with Kings Plains residents to identify possible additional measures that could be implemented to both mitigate impacts and to ensure the community benefit from the project. Further, as part of the adaptive management process which will be described in the SIMP, Regis will continue to monitor the effectiveness of these measures in benefiting the Kings Plains settlement in consultation with the community.

In relation to addressing the potential for distributive inequality for other groups in the regions, such as lower income households, it is noted that the flow-on economic benefits of the project, which will be significant, will benefit the community as a whole in Blayney. The funding of community infrastructure projects through the VPA, which has been executed between Regis and BSC, will also benefit the broader Blayney community. In addition, there will be employment opportunities open to the community, along with training and skill development programs.

The issue of intergenerational equity was addressed in detail in Section 37.7.2 of the EIS. As described, some impacts on natural resources will occur as a result of the project, primarily through the removal of native vegetation. However, a biodiversity offset strategy has been developed for the project, and once implemented, will mean a net beneficial gain in biological resources to benefit future generations. A key part of this strategy is establishing a stewardship agreement over a property which Regis has already purchased to effectively offset the biodiversity impacts of the project.

The only beneficial land use that could be affected by the project is agriculture. In this regard, the agricultural capability of the land to be disturbed will be progressively reinstated so that, except for the final void, the project area can be used for agriculture at the end of the mine life. After production ceases, the pipeline development could remain in place and in doing so would remain a valuable infrastructure asset and enhance water security for future generations in the wider Central West region.



A natural resource that will be lost as a result of the project is the in-situ gold. On average, 200,000 ounces and up to 250,000 ounces per annum of product gold will be removed over the mine operating life. Gold is a recyclable metal that can be reused for generations. Further, the revenue generated by the project will be used to employ and up-skill the mine workforce and provide more community facilities and other social infrastructure, mainly through the VPA. This will allow natural capital (gold) to be transformed into economic capital (greater personal and public income), social capital (better public facilities) and human capital (a more skilled and wealthier workforce).

## 8. Accommodation

The SIA has identified the potential accommodation shortages in the Blayney LGA to meet demands of the project and potential impacts which include:

- increased demand for short term accommodation by the construction workforce, which presents challenges for competing local industry and businesses
- workforce accommodation demands reducing accessibility and affordability to private housing for existing and future residents
- increased pressure upon local services, facilities and infrastructure
- displacing lower income households and loss of social diversity

The SIA and SIA Addendum includes the proposed Workforce Accommodation Management Framework which includes objectives to address some of these issues. However further detail is required about the proposed performance criteria from Regis against which the implementation of this strategy can be assessed. Please also provide further discussion about strategies Regis is considering to address the potential issue of insufficient accommodation for workers.

The SIMP to be developed for the project will include a detailed framework for monitoring accommodation availability and performance criteria against which measures implemented will be assessed.

In relation to addressing the potential for accommodation shortages in the local region, Regis continues to encourage and support expansion of accommodation in the area. A notable development in the future availability of accommodation in Blayney is the recent approval of the Blayney Bowling Club re-development by BSC. This development involves the construction of hotel style accommodation at the bowling club site, which is currently closed and not in use. The development will provide accommodation for approximately 90 people in stage 1, and a further 40 in stage 2.

It is acknowledged that this one development will not fully address the anticipated accommodation demands of the project; however, it is a significant step towards contributing to an increase in short-term accommodation availability in Blayney. While the SIA (Hansen Bailey 2019) acknowledged that not all accommodation needs of the project could be met in Blayney, it identified that there is a large number of accommodation options available to meet the demand in the broader region and particularly in the regional centres of Orange and Bathurst, which are both within a one-hour commute of the mine.

Specifically, the SIA identified there are more than 1,000 rooms of short-term accommodation available in Orange and Bathurst, with occupation rates of around 70% and 55% respectively. This indicates that the Orange and Bathurst LGAs have capacity to accommodate a significant portion of the construction workforce for the project. The SIA also found that there is ample supply of housing in these broader LGAs to accommodate the predicted operational workforce demands.

The SIMP will further describe measures to meet accommodation demands utilising availability in the region. As described in the response above, Regis will also work with Orange360 to monitor accommodation availability. Details on Orange360 are provided below.

## 9. Local labour draw

The SIA (p.22) notes that approximately 60% (367 workers) of the total construction workforce for the mine development and 20% (24) of the pipeline construction workforce is anticipated to be local hires, which may result in labour draw from existing local employers. Please clarify the statement made in the SIA (s 6.2.9) that Regis will “monitor local labour supply and adjust local labour recruitment practices and rates accordingly”.
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Regis are part of a group facilitated by Orange360, which monitors accommodation availability and employment in the region. Orange360 is a regional tourism initiative, formed by BSC in partnership with Orange City Council and Cabonne Council, to market the regional area and grow the tourism industry. Involvement in this group by Regis will provide an effective means of monitoring labour supply. Regis also meets regularly with major employers in the area, as well as training providers and council. This engagement will continue throughout the life of the project and will provide an effective means of collaboratively monitoring and addressing any issues with labour supply or accommodation availability if they arise.

The SIMP for the project will further describe a detailed framework for monitoring local labour supply and adjusting recruitment practices accordingly.

## 10. Closing

If you require any further detail or wish to discuss the information provided, please do not hesitate to contact either Danielle Wallace ([dwallace@regisresources.com](mailto:dwallace@regisresources.com)) or Andrew Wannan ([awannan@regisresources.com](mailto:awannan@regisresources.com)).

Yours sincerely



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## **References**

EMM Consulting 2019, *McPhillamys Gold Project Environmental Impact Statement*, Prepared for LFB Resources NL.

EMM Consulting 2020a, *McPhillamys Gold Project Submissions Report*, Prepared for LFB Resources NL.

EMM Consulting 2020b *McPhillamys Gold Project Amendment Report*, Prepared for LFB Resources NL.

Hansen Bailey 2019 *McPhillamys Gold Project Social Impact Assessment*, Prepared for LFB Resources NL.

Hansen Bailey 2020, *McPhillamys Gold Project Social Impact Assessment Amended Project Report*, prepared for Regis by Hansen Bailey.

Landskape 2019, *Aboriginal and Historical Cultural Heritage Assessment*, Prepared for LFB Resources NL.

Landskape 2020, *Addendum to the Aboriginal and Historical Cultural Heritage Assessment*, Prepared for LFB Resources NL.

NSW Government 2018, *Voluntary Land Acquisition and Mitigation Policy*.

OzArk Environment & Heritage 2019, *Aboriginal Cultural Heritage & Historic Heritage Report, McPhillamys Gold Project: Pipeline development*,

OzArk Environment & Heritage 2020, *Addendum Aboriginal Cultural Heritage & Historic Heritage Report, McPhillamys Gold Project: Mine Access Road and Pipeline Options*,