

Shane Vagg
Huntingfield & Sunshine Stations
Nulla Road, Wentworth NSW 2648

Re: Objection to the Copi Mineral Sands Project Development Application SSD-41294067

I write to you to strongly **OBJECT** to the COPI Mineral Sands Project. My name is Shane Vagg, my family and I are farmers and our land will be directly impacted by the COPI Mineral Sands Project.

I am the owner of Huntingfield and Sunshine stations which is currently referred to in the EIS as property R1 and R5. According to the Map on EIS page ES-2, half of the total extraction area is proposed over my land.¹

My wife, Ferna and our 2 young children and I live on these stations. Since 2017 we have run a goat breeding business on these stations. Goat breeding requires particular infrastructure and management. Significant work and improvement has been made to these stations to run this successful business. These stations are covered with items defined in the Mining Act 1992 (NSW) as "*agricultural land*" and "*significant improvements*" in relation to which we have exercised our rights under the Mining Act to protect. The consequence being that a mining lease may not be granted over the land upon which is situate this agricultural land and our significant improvements. These objections do not appear to have been mentioned in the Applicant's EIS. Assuming our objections are sustained, approximately 1/3 of the western side of MLA 629 would not be granted.

I, as owner and occupier, object to the development described in the development application number SSD-41294067 and set out in the EIS dated May 2024. I object, as does my family, to the project on the basis of the noise, dust, light impacts which the project will impose on our amenity and on the amenity of the animals upon which our livelihood is based.

Condition of any development consent

Notwithstanding the statements of RZ Resources concerning our property Huntingfield and Sunshine stations (R1 and R5) in the EIS (page 2-17, section 2.2.31, dot point 3: '*if no agreement is reached mining would not be undertaken on that property*'), if development consent is to be granted, I request there be a condition imposed that:

RZ Resources must not carry out any development work on either or both of Sunshine and Huntingfield stations until after the settlement of a purchase, lease or licence of these properties from the owner.

This is a condition similar to that imposed in the Ashton Coal Operations Pty Ltd in its South East Open Cut Coal mine following the decision of Pain J and upheld by the NSW Court of Appeal decision in the case Ashton Coal Operations Pty Ltd v Hunter Environment Lobby Inc [2015] NSWCA 358.

I object to the project based on our family house being 1.3km from the mine pit. The applicant, RZ Resources (RZ) has tried to scare us into selling our farm to them, with several verbal threats of forced acquisition.

I object to the project based on my concerns about the project risks to our home and our health. We will be living very close to the mine pit. We have concerns about the dust, noise, light and exposure

¹ It is unclear to me whether the economic viability of this project is based on mining the resource on my land. I have refused to sell my land to RZ Resources because the offers made to me have been unacceptable.

to radioactive materials. We have concerns about the impact to our business and livestock, and our livestock's health. We have concerns about the impact to our livelihood, environment and way of life.

I cannot see how the project is viable without our farm. The Copi project plans to mine for 17 years, 7 of those years would be extracting minerals on our farm. RZ states in the EIS that they cannot mine our farm without our consent. This reduces the mine to 10 years of mining, which the EIS has not modelled for. The EIS is based on RZ mining for a full 17 years. This makes the economic viability of the project flawed.

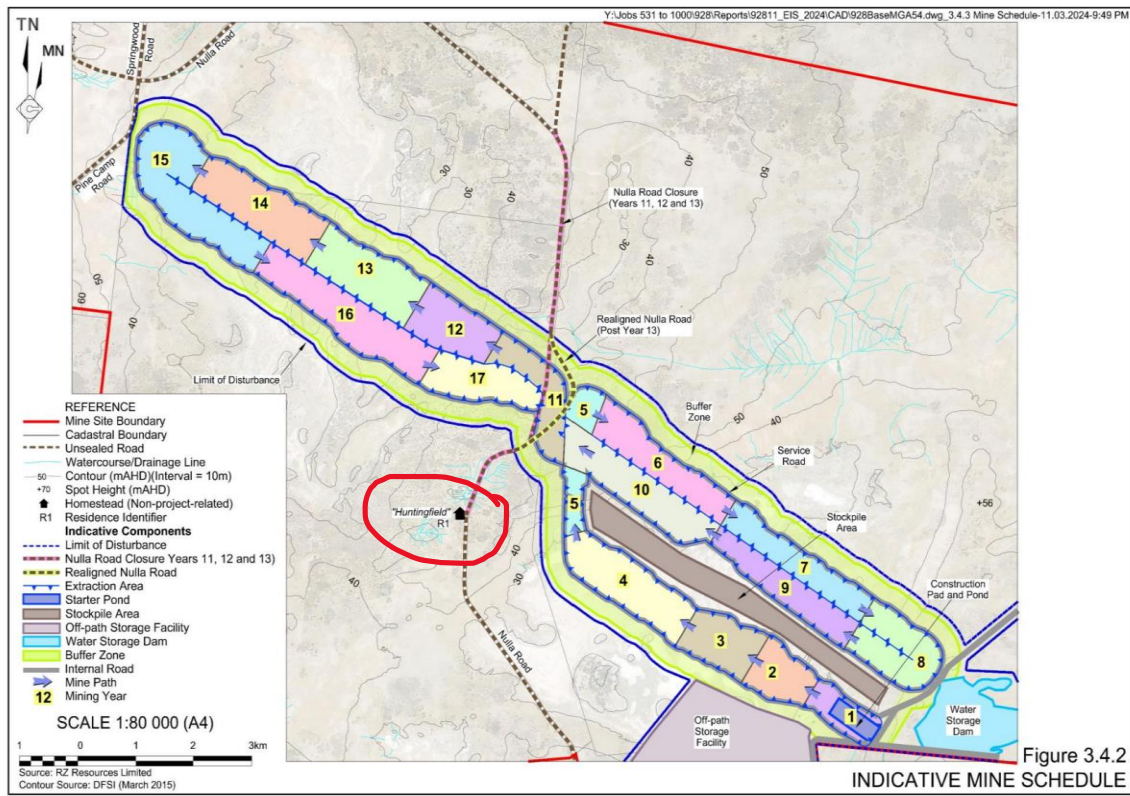
I would like to note that I am not anti-mining. I worked in Coal mines in Queensland and NSW for more than 10 years. I worked as a machinery operator and a shot firer. I object to the poor-quality EIS, the inaccuracies in the project predictions and explanations, and the poor character of the applicant (RZ Resources). I object to the unacceptable risk this project exposes my family, our business, and our land to.

Background:

We run a managed goat herd of Boer cross Rangeland goats. We use management principles similar to a sheep or cattle business. We breed goats for meat. We produce high-quality, healthy animals. We focus on producing polled goats (no horns), and we aim to use as few chemicals and manufactured inputs as possible. We supply goats to the domestic and export market. We supply seed stock to other farmers who are getting into goats, or looking to improve their herd. I purchased this land from my father, and I farm with my family. My family are all active on the farm, we work together to muster and manage the livestock. I hope our children will have the option to farm in the future and continue to enjoy the lifestyle that we love.

We have invested heavily in our farm to have quality fences to protect our stock and our grazing land. We invested in a water management system with all dams and troughs connected to a central pipeline allowing water to be delivered to any paddock. The landscape on our farm is ideally suited to goats, they thrive on our farm. Our goats have plentiful shelter and shade combined with open grasslands and a wide variety of plants to graze on. Our farm infrastructure has been installed and replaced over the past 7 years. This has been a costly investment financially and in labour to build each piece of infrastructure.

The noise, dust and light that would accompany the Copi project is of great concern for our family. Our house would be close to the mine at all stages of mining. See our house 'Huntingfield' at R1. There will be no escaping this project for us.



Risk to our health

We object to this project based on the risk to our health. Radioactive materials will be produced and concentrated. Yet there is no Radiation report in the EIS. There is no salt balance report in the EIS. There is very limited detail about how the minerals will be handled outside the dredge pond. At some stage these minerals will need to be dried out and handled. The EIS has a LOT of 'flexible elements', there is a lot of terminology like: this may, this should, will likely, cannot be described with certainty, anticipates, may not be available, and so on. This unspecific detail means we cannot properly assess the project and its impacts to our health and business. There will be hazardous radioactive materials, heavy metals, flocculents, slimes, highly saline water, acid sulphate soils, high risk saline over/interburden, reverse osmosis brine and substantial volumes of saline water as a result of this project. Highly saline water will be pumped onto the ground to dry out, and acid soils will be stored above ground. There is limited detail about the handling of the radioactive material between being removed from the ground and ending up in containers. Who will handle this radioactive material and how will it be handled? There are far too many risks, too many variables and 'flexible elements' and too little detail for us to feel safe living 1.3km from this project for 17 or more years.

The risk to our ground water, rain water, stock water, and vegetation that feeds our stock is significant. We eat from the land as much as possible, we eat our own meat, grow fruit and vegetables, catch yabbies, and eat bush foods like quandongs. All these elements that we consume and live surrounded by, will be exposed to radiation and contamination. The cumulative impact of these contaminants on our health over 17-plus years fills me with dread. The disturbance of saline aquifers is concerning. The risk of changing the salt balance in our environment is significant. We have a number of natural wetlands that fill after rain, these support a diverse range of plants and animals, some threatened. All of this is at risk as soon as you start to disrupt the natural landscape.

The project will disturb aquifers, vast quantities of highly saline water and soil will be moved. We worry that there will be irreversible changes to our landscape. This risks our health, lifestyle, business, and all the flora and fauna that call the area home. The adverse effects of this project may not be seen for many years, and may be irreversible.

Lake Victoria, Murray River, Great Darling Anabranh

The project is located a short distance from Lake Victoria, the Murray, the Darling Baaka and Great Darling Anabranh rivers. The lack of detail related to the hazardous radioactive materials, heavy metals, and contaminants this mine will generate is concerning. These water bodies provide drinking water for many people, they support Agricultural businesses in 3 different states. If there was an environmental disaster at the Copi project, the close vicinity to these water bodies is a significant risk. The water aquifers that the project will disturb are linked to Lake Victoria. Lake Victoria provides drinking water to South Australia. The project has so much ambiguity that the risks are not worth it. There are so many examples of mines that create environmental disasters. Mining is risky, and the risk assessments in the Copi project EIS are too optimistic.

Risk and impact on our business

This project risks our business. The proximity to our farm, the number of toxic, radioactive, hazardous and potentially damaging elements involved with this project is too great a risk. The risk to our livestock is concerning. These elements could contaminate our meat. If any of our export partners tested our meat and found contamination, it would risk Australia's Agriculture industry and our reputation of providing clean healthy food to the world.

We plan to diversify our business. We plan to develop organic paddock to plate models, eco-tourism options, fly-in/fly-out stays utilising our airstrip, star gazing stays (we have phenomenal night skies), renewable energy opportunities and carbon credit trading. Our proximity to the Copi mine restricts our business potential. The visual impact, noise, sound, light glow and risk of contamination and radiation are major barriers. The Copi project damages our opportunities to grow and diversify in a changing world. The potential long-term effects of the mine will impact our business for many years to come.

We have explored carbon credits and renewable energy projects for parts of our farm. Our land being locked in RZ's exploration and mining leases is already stopping these options for us.

RZ Resources- have never operated a mine before.

We have known RZ Resources since 2018. At that time RZ called themselves Relentless Resources. RZ have breached mining legislation (Act/Regulations) on several farms/exploration licences. RZ has never run, owned or operated a mine before. They are a new company with limited experience and limited financial resources. We believe that RZ has a poor corporate culture, evidenced by repeated failures to follow mining legislation, and our personal experiences dealing with RZ.

RZ has made several offers to buy our farm. These offers have been unsolicited and usually arrive by email after no discussion. There has been no 'negotiation' in the true sense of the word. RZ made an offer to buy our farm at a meeting, we rejected the offer on the spot. RZ told their local staff about some details of that offer (including the price offered) and this information travelled through our local community. RZ would email us about sensitive information, and link local staff into the emails. In late 2023 we received an unsolicited offer to buy our farm from RZ by email. We had 2 solicitors review the offer and both advised there were terms/clauses in the offer that were very unfavourable to us, and that we would be crazy to accept the offer. RZ gave some details of this offer to members

of our local community. We have been approached by many community members to ask us about this offer. These community members tell us where they heard the information and ask us why we were so crazy not to accept it. These community members did not see the entire offer, and the loopholes RZ had included in the offer to disadvantage us.

RZ was trespassing through our paddock to get to a neighbouring farm. They did this without an easement and without our permission. We asked RZ to stop. RZ told us if we wanted them to stop we should get an injunction. This trespass continued for many months, and involved many vehicles each day, some days we counted 15 vehicles. The trespass would stop on days the NSW Resources Regulator would be doing site inspections, but resume as soon as the Regulator had left the area.

We emailed RZ on 10/05/2022 to say:

We repeat that RZ resources and contractors do not have permission to access Warwick station through Huntingfield/Sunshine station. There is no easement for you to travel through our property for the purpose of accessing Warwick Station. RZ Resources needs to cease travelling through our paddock immediately. RZ resources have no access to Huntingfield/Sunshine, for any purpose, until we resolve matters through arbitration.

RZ forwarded our email around to 11 different staff members saying:

News just in....

We then received the below email response from RZ on 10/05/2022:

If your client wishes RZ to cease access to the property it has leased and is purchasing via its traditional access then please seek an injunction to attempt to stop such access.

It is a fact that your client does not depasture any goats in that paddock and any RZ traffic to Warwick is the same as any traffic on Nulla Road it should be of no moment to your client. We consider that he is merely being unnecessarily provocative and combative for reasons best known to him.

Please advise him that any attempt to lock or close the boundary gate will result in RZ seeking damages for any such interruption to its lawful access and activities.

Eventually we called the police. The trespass stopped. This trespass caused our whole family significant distress.

RZ has had high staff turnover in the years we have known them. We have been approached by several ex-RZ employees who felt we should know about some incidents that happened. Some of these incidents include RZ staff failing drug tests but being allowed to continue to work on our farm, RZ staff member bringing a firearm onto our farm and firing it, RZ staff arranging meetings with our neighbours but not meeting with us, RZ staff noting our movements/activities, photographing us working on our property and recording conversations with us.

RZ's compliance record

RZ has a poor track record of complying with NSW mining legislation. They have committed more than 100 breaches of mining legislation. There have been multiple investigations into RZ Resources (previously called Relentless Resources).

- **20th May 2021** – The NSW Resources Regulator imposed a Variation of Authorisation on RZ's (Relentless Resources) Exploration licences. The regulator considered suspending the exploration licences but instead imposed 'mandatory audit conditions' on all of RZ's licences. The offences included creating unapproved access tracks, excessive drill depths, unrehabilitated drill holes, use of an unapproved drill rig, not having a community consultation strategy and providing multiple counts of false and misleading information. These offences occurred on multiple exploration licence sites. Some of these offences occurred on our farm.
- **14th November 2022:** We received information from a GIPA request which proved RZ had provided False and Misleading information to the Regulator. On one occasion RZ received an official caution, on the other occasion they received a penalty notice (see below).

CONTACT

RZ RESOURCES LIMITED

COMPLIANCE HISTORY

NUMBER / GROUP NUMBER	LOCATION	CATEGORY	SUBCATEGORY	NON COMPLIANCE DATE	OFFENCE PROVISION	REGULATORY RESPONSE
NCN0009654 NCG0004511	EL 8312 (1992)	False or misleading information			Mining Act 1992 s 378C	Official caution
NCN0009655 NCG0004511	EL 8312 (1992)	False or misleading information			Mining Act 1992 s 378C	Penalty notice

Released by DRNSW under GIPA Act 23-103

- **March 2023-** RZ enters into an Enforceable Undertaking (EU) agreement for 'alleged' offences of mining legislation. The enforceable undertaking allowed RZ to not admit guilt to any of the offences. As a result of the EU, RZ had to spend money to purchase better software, donate money to the Association of Mining and Exploration Committee (AMEC), pay money to the Wentworth Shire Council for works on a public park, and to pay the Regulators costs. Several of the offences occurred on our farm, there has been no amends made by RZ to us as affected farmers. The offences included not completing rehabilitation, not monitoring completed rehabilitation, failing to maintain adequate records, failing to comply with activity approvals, not consulting landholders, not keeping records of consultation with landholders, not keeping records of roads and tracks constructed and the rehab of these tracks, digging a pit and burying spoil without approvals. RZ Failed to comply with a Notice from the Regulator and did not provide information and evidence to the Regulator when requested on more than 1 occasion.
- Please see extract from Mining, Exploration and Geoscience newsletter- 'Mining Memo- May 2023 edition' which states RZ committed more than 100 offences.

ENFORCEABLE UNDERTAKINGS

RZ Resources

The Resources Regulator commenced an extensive investigation into 10 of the 14 exploration licences following a site inspection as part of a compliance audit in 2020. It was found that RZ Resources Pty Ltd (RZR) had committed over 100 offences under mining legislation in NSW across multiple titles.

In lieu of prosecution, the Regulator accepted an enforceable undertaking from RZR.

The Regulator continues to monitor all operations undertaken by RZR to ensure compliance with its regulatory requirements.

Wollongong Coal Limited and Wongawilli Coal Pty Ltd

Wollongong Coal Limited and Wongawilli Coal Pty Ltd has completed an enforceable

RZ's Community Consultation- our experience

We had to cease normal communication with RZ as we were being bombarded by RZ staff. Some days we would receive 6 or more phone calls from different RZ staff members. Some days we would receive more than 10 emails from multiple RZ staff members. This was not sustainable for us. Each staff member was wanting us to provide some information or approval for a different matter. We were trying to run our own business but found we had to spend much of our time dealing with RZ. RZ would email us saying we had said 'XYZ', but in reality, we had said 'ABC'. We had to spend time correcting RZ staff and correcting the record. The volume of communication, and the number of incorrect statements RZ was documenting from us was overwhelming. We have now directed RZ to send all communications to our solicitor, which of course costs us money as our solicitor has to read all communications.

In February 2022 an RZ staff member tried to phone us over the weekend, we didn't answer. So RZ's Lawyer (general counsel) sent us an SMS text message at 6:31am on a Monday morning.

Today 6:31 am

Shane , if you want give me a ring as our place is just flooded downstairs. So I have been up all night . Warren has been trying to contact you . No answer from Vagg is not what I consider to be trying to work with RZ .
Bill

The tone of this SMS reflects much of the communication we have received from RZ.

We had an agreement with RZ that clearly stated no workers/contractors were to come to our house. Multiple times we found RZ trucks and cars at our house to use our mobile phone service booster. On one occasion the workers 'shooshed' one of our family because they needed to make a phone call. Another time we had been away, and RZ staff had been at our house to use the phone service. We found foot prints all around our sheds and equipment. These unwanted visits kept happening, despite us communicating the incidences to RZ.

We gave permission for an Aboriginal Cultural Heritage survey over certain areas of our farm. We excluded access to some paddocks as our goats were having kids (babies). RZ went into some of those paddocks anyway. Then argued with us that we had given permission. RZ emailed us to tell us they were not going to harm our goats by being in those paddocks, so apparently RZ knows more about goats than we do. There has been an RZ attitude that our business doesn't matter.

On one occasion RZ sent a contractor to our farm in February, in the middle of summer. The contractor rode back and forth through some paddocks mapping them in a buggy. This had not been communicated to us clearly by RZ. At the end of the day, the contractor would park their buggy near the water trough for the paddock. The goats would not come in for a drink of water, it was extremely hot. We took photos and asked RZ to have the contractor move the buggy. The next day we found the buggy parked in the exact same place, preventing our stock from getting to water again. There were several emails back and forth. This risked our livestock and took up our valuable time.

We recently attended a community consultation held by RZ (11/04/2024). The session was not advertised by RZ and was attended by 1 council member and ourselves. RZ staff repeatedly denied that they had ever been found guilty of providing false and misleading information to the NSW Resources Regulator. An RZ staff member called my wife 'Honey' in an insulting tone. The staff member for RW Corkery & Co, raised his voice trying to talk over the top of us, telling us we had to listen to him. We left the session early.

RZ held another community consultation session on 30/04/2024, we did not attend. Some community members have told us that RZ had the NSW Police checking in on them in case some 'disgruntled farmers' showed up.

RZ has never had a community consultation meeting, where they presented the same information publicly to a group of people/landholders, and offered the community an opportunity to publicly ask questions.

At the 2023 Wentworth Show, other landholders/neighbours saw us and we discussed RZ Resources. These landholders told us that at the show they had been told by RZ that my family were causing RZ lots of troubles, and that RZ had offered us enough money to retire on to buy our farm off us. This is the sort of community consultation RZ Resources conducts.

I could give many more examples of poor conduct by RZ.

RZ mentions in the EIS that they anticipate resolving the conflict between ourselves and RZ. RZ commenced a dispute resolution process in 2022. We engaged in this process for months, with much legal advice required. RZ cancelled the process without a resolution. RZ then started an arbitration process in 2023, which continues today. We have not entered this process voluntarily, and have been bound by confidentiality about the process. RZ requested the process be paused for many months, but has recommenced the process in June 2024 within the 28-day period for us to read and respond to this EIS. The process of dispute resolution and arbitration has been at our own expense, this has cost a large amount of money in legal fees. The longer these processes go on, the more it costs us.

Inconsistencies and objections to information in the EIS

I want to bring the following points from the EIS to your attention.

Page ES-3- Last dot point on the page: *'RZ Resources has provided 'financial contribution to help reconstruct the Junction Island pedestrian Bridge.'*

This is a misleading statement, RZ Resources paid this money as a fine imposed by the NSW Resources Regulator as part of the terms of an Enforceable undertaking for committing more than 100 offences under the mining act (see mining memo May 2023).

Page ES-4- last paragraph, continues on page ES-5: *'The Company is also negotiating with the owner of Huntingfield/Sunshine station to resolve access and mining lease objections.'*

RZ Resources has not negotiated anything. They have drawn us into Arbitration, bound us in a confidentiality clause, and this process is now nearing 12 months.

Page ES-6, column 1, last paragraph: *'Up to 7,500t of Monazite Product will be produced each year. That material will be classified as a Class 7 (Radioactive Material).'*

RZ Resources has not disclosed that they will be handling/processing radioactive materials to us as neighbours/affected parties. It is only through reading this EIS we started to understand the risks to our family by being so close to the proposed mine and its radioactive activities.

Page ES-8, column 1, paragraph 3: *'RZ Resources, in consultation with surrounding residents, proposes to close Nulla Road during Years 11, 12 and 13 between the entrance to the Huntingfield homestead and the southern entrance to Wenba Station.'*

RZ Resources has not discussed the closure of Nulla Road with us, or sought our feedback, and we own the farm where the closure is planned. We use this road daily in the running of our farm.

Page ES-8, column 2 last paragraph: *'Progressive rehabilitation will be undertaken throughout the life of the Project.'*

We have exploration activities from RZ Resources that remain unrehabilitated more than 2 years after the exploration activity. We have tracks in our paddocks dating back to 2018 that remain unrehabilitated.

Page ES-12, column 1, paragraph 3: *'RZ Resources is committed to ongoing, open, and transparent communication with all affected stakeholders throughout the Project.'*

This has not been our experience. RZ has provided false and misleading information to the NSW Resources Regulator more than once.

Page ES-12, column 1 paragraph 5: *'RZ Resources' Community Engagement Strategy was prepared in accordance with the guidelines published by the Department of Planning and Environment and implemented throughout the Project's design and planning phases.'*

Our experience is of poor community engagement. RZ conducted aerial surveying over our property without any notification to us. The survey lasted hours, with a plane flying continuously back and forth over our house and property. We were not notified of this exploration activity. We do not know if the plane was photographing our activities, we were mustering at the time.

Page ES-12, column 2, paragraph 4: *'RZ Resources will continue to encourage two-way communication that is meaningful, relevant, and respectful with community members and stakeholders'*

RZ staff have not been respectful to us as affected landholders. This includes calling my wife 'honey', and several staff have raised their voices to us on several occasions. This includes denying being found guilty of providing false and misleading information. One RZ manager told us that all we do is 'catch feral goats' and that 'all our neighbours are fencing goats out', this is not respectful communication.

Page ES-12, column 2, last paragraph and dot points: *'Key matters of interest raised during landholder and community engagement included the following'* (list of dot points).

RZ did not disclose much of the project detail, including the production and handling of radioactive material. So the community could not comment on what they did not know.

Page ES-15, column 1, dot point 3: *'No threatened or migratory fauna species were recorded within the Biodiversity Assessment Area.'*

We see Pink Cockatoos most days on our property and have extensive video and photo footage of Pink Cockatoos, including baby pink cockatoos, on our farm. In Australia the Pink cockatoo is listed as endangered under the Environment Protection and Biodiversity Conservation Act 1999. One major risk to pink cockatoos is habitat loss through land clearing (including mining) and loss of nesting hollows. We photographed a family of 15 pink cockatoos near our house in April 2024, in this family there were several babies with lighter coloured feathers. We see this family regularly near our house, which is very close to the proposed mine site.



Here you can see pink cockatoos drinking from one of our troughs in summer. We see this family of cockatoos drinking from our trough most days in the warmer months. We see them eating a wide range of plants on our farm.



Page ES-17, column 2, paragraph 7: *'One farm dam within the Huntingfield Station will be relocated / reinstated and a suitable compensation agreement will be negotiated with the landholder.'*

RZ has never communicated this to us, the owners of Huntingfield Station, reading the EIS is the first we were aware of this plan. We believe from reading the EIS the catchment area for some of our other dams will be affected, this does not seem to have been considered by RZ in the EIS.

Page ES-18, column 1, paragraph 4: *'the agricultural use of the total area of disturbance within the Mine Site is currently valued at approximately \$50,414pa.'*


This statement is irrelevant, an estimate, and does not in any way represent the actual value of agricultural activities on the land. It does not consider different business models.

Page ES-19, column 2, last paragraph: *'The Project was also assessed for compliance with community views.'*

We attended the community information session on 11th April 2024 and asked a senior RZ staff member about RZ providing false and misleading information to the government, he denied this had ever happened, he denied it multiple times when asked. We know that RZ has been found guilty of providing false and misleading information. RZ has misrepresented themselves to the community and in the EIS, by calling a fine a community support donation. This would not comply with community views or the 'pub test'.

Page 1-7, paragraph 2: *'In March 2023 the Resources Regulator and the Applicant agreed to an enforceable undertaking under the Mining Act noting that there were potential issues with past exploration activities'*

This is a misleading statement. There were not *potential* issues, there were more than 100 breaches of mining legislation. Please refer to attached Mining Memo from May 2023 circulated by Mining, Exploration and Geoscience.



ENFORCEABLE UNDERTAKINGS

RZ Resources

The Resources Regulator commenced an extensive investigation into 10 of the 14 exploration licences following a site inspection as part of a compliance audit in 2020. It was found that RZ Resources Pty Ltd (RZR) had committed over 100 offences under mining legislation in NSW across multiple titles.

In lieu of prosecution, the Regulator accepted an enforceable undertaking from RZR.

The Regulator continues to monitor all operations undertaken by RZR to ensure compliance with its regulatory requirements.

Wollongong Coal Limited and Wongawilli Coal Pty Ltd

Wollongong Coal Limited and Wongawilli Coal Pty Ltd has completed an enforceable

Page 1-15, dot point 3: *'Early and regular consultation with the community surrounding the Mine Site, as well as the residents and businesses of the Wentworth LGA and surrounding areas.'*

Our experience as a project affected landholder has not been of regular consultation. We requested RZ provide all communication in writing to us via our solicitor. We have received 3 'Neighbour Updates' (2 page documents) providing information on the project since 2023, and RZ sends these to an old email address despite being asked to send correspondence to our current email address. There are many things that RZ could have communicated to us but did not. RZ has changed their project design significantly over these 3 updates. It has been hard to know what is really going on from the limited information received by us.

Page 1-15, dot point 9: *'maintain open and honest communication'*

RZ has already been found guilty of providing false and misleading information to the NSW Resources Regulator. There are many statements in this EIS that I believe are misleading.

Page 3-89, bottom of page: *'The Extraction Area would be backfilled with the pre-mining landforms largely reestablished, with the exception of the following (Figure 3.12.1).*

– Sections of the completed Extraction Area would be higher than pre-mining landforms to accommodate for the fact that the extracted material will "swell" and occupy a larger volume than the in-situ material, as well as scheduling of overburden and interburden extraction. The built-up sections of the final landform would incorporate the following design criteria.

- *Maximum slope.....up to 6° or 1:10 (V:H)*
- *Upper surfaces.....internally draining'*

What the project proposes is that our farmland will not be returned to its pre mining condition. This would have dire consequences for our business. We are reliant on rainfall for our livestock. Changing the lay of the land and the flow of rainwater to our dams would significantly impact our business and the animals/plants who rely on the rainfall for their survival. If we were unable to catch rainwater to sustain our livestock and business, our farming business would be unviable.

Page 3-91, Final Land Use: *'The Applicant assessed potential final land use options for the Mine Site, including the following.*

• *Agriculture – the Mine Site is currently used for low intensity grazing, including for sheep and goats (including harvesting of feral goats). Consideration was given to re-establishing such a land use on the final landform. However, this option was rejected for the following reasons.*

– Respread soil would lack the naturally occurring cryptogams or fungal crust that assists to stabilise fragile soils in naturally occurring landscapes within the Mine Site. While the soil would be protected with grazing excluded until naturally occurring cryptogams can be re-established, hard-hooved animals such as sheep and goats would limit the success of re-establishment of that process, resulting in turn in increased susceptibility of the soils to erosion by wind and water and reduced rehabilitation success.'

This statement tells us that we will not be able to farm our own land after the project is finished. How can we support a project that proposes this level of destruction, and such uncertainty about the final condition of the land? We own the land, every acre is valuable, the project will deny us use and access to our land for an unknow time. Even once rehabilitated the land will be susceptible to erosion.

Page 3-93, Rehabilitaiton Objectives and Outcome Criteria: *'The Applicant recognises that progressive rehabilitation of the areas disturbed throughout the life of the Project is an integral component of the Project. Progressive rehabilitation is recognised as being consistent with best practice mine rehabilitation and maximises the chances of rehabilitation success.'*

RZ had access to our farm for several years during their exploration phase. We have drill holes that have collapsed. RZ did not inspect the completed rehabilitation of these holes, so was unaware of the failures until we brought it to their attention. Now several years after these works, the holes remain unrehabilitated. We have to cover the holes with large boards to prevent people and animals

from injury and death. We have kilometres of tracks through our paddocks from RZ's drill rigs. RZ has not committed to rehabilitate the tracks.

Photo below of a collapsed RZ drill hole taken 2022. These holes remain in this condition today. We covered the holes with boards to protect people and animals from injury and death.



Photo above of RZ's tracks through our paddock. You can see the white sample bags taken by RZ at each drill hole and how the track follows the drill holes. We have tracks like this in our paddock dating back to 2018 that remain unrehabilitated. Below: Photo of drilling in progress on our farm (2021).



Page 3-100, Post-closure Maintenance: *'Post-closure maintenance is expected to include the following.*

- *Maintenance of fences and infrastructure to exclude feral pest species, including continued removal of watering points.*
- *Continued pest and weed management programs.*
- *Continued monitoring to track progress of sections of the Mine Site towards relinquishment criteria'*

How long would pest and weed management programs continue? 6 months? 6 years? There is a clear lack of detail here, and lack of thought on how this would impact our use of our farm.

Page 5-8: Table section relating to 'Huntingfield and Sunshine Stations'

The information provided here is misleading. RZ has been asked to provide updates to us by email. We have received 3 updates on the project since early 2023. RZ has provided very little information on the project to us.

Pg 6-46, dot point 3: *'Aerial photo interpretation, extrapolation of results from other areas of the Biodiversity Assessment Area and viewing from public access points, such as Nulla Nulla Road, has been relied upon where access to certain areas was constrained.'*

We think this means that a drone was used to take aerial photography over our farm. Nulla Road runs through our property. RZ and contractors have not accessed our farm for studies for more than 2 years. We were never notified that RZ would be taking aerial photographs of our property.

Page 6-49, Predicted Species Credit Species table 6.3.3: We note the Pink Cockatoo is not identified as endangered in the EIS.

Copi Mineral Sands Project

Table 6.3.3
Predicted Species Credit Species

Page 1 of 2

		Species for Further Assessment		Listing Status	
Scientific Name	Common Name	Retained?	Reasons for Exclusion	BC Act	EPBC Act
Flora Species					
<i>Acacia acanthoclada</i>	Harrow Wattle	Yes	-	Endangered	-
<i>Acacia carverorum</i>	Purple-wood Wattle	Yes	-	Vulnerable	Vulnerable
<i>Atriplex infrequens</i>	-	Yes	-	Vulnerable	Vulnerable
<i>Austrostipa metatoris</i>	-	Yes	-	Vulnerable	Vulnerable
<i>Austrostipa nullanulla</i>	Nulla Grass	Yes	-	Endangered	-
<i>Brachyscome papillosa</i>	Mossiegi Daisy	Yes	-	Vulnerable	Vulnerable
<i>Calotis moorei</i>	A burr daisy	Yes	-	Endangered	Endangered
<i>Cratystylis conocephala</i>	Bluebush Daisy	Yes	-	Endangered	-
<i>Dodonaea stenozyga</i>	Desert Hopbush	Yes	-	Critically Endangered	-
<i>Kippistia suaeifolia</i>	Fleshy Minuria	Yes	-	Endangered	-
<i>Lasiopetalum behrii</i>	Pink Velvet Bush	Yes	-	Critically Endangered	-
<i>Leporhynchus waitzei</i>	Button Immortelle	Yes	-	Endangered	-
<i>Pimelea serpyllifolia</i>	Thyme Rice Flower	No	Subject land is more than 50km from Murray River	Endangered	-
<i>Pterostylis cobarensis</i>	Greenhood Orchid	Yes	-	Vulnerable	-
<i>Santalum murrayanum</i>	Bitter Quandong	Yes	-	Endangered	-
<i>Swainsona colutoides</i>	Bladder Senna	Yes	-	Endangered	-
<i>Swainsona pyrophila</i>	Yellow Swainson-pea	Yes	-	Vulnerable	-
<i>Swainsona sericea</i>	Silky Swainson-pea	Yes	-	Vulnerable	-
Fauna Species					
<i>Amytornis striatus</i>	Striated Grasswren	Yes	-	Critically Endangered	-
<i>Ardeotis australis</i>	Australian Bustard	No	Species is vagrant and habitat has been degraded by extensive grazing	Endangered	-
<i>Burhinus grallarius</i>	Bush Stone-curlew	Yes	-	Endangered	-
<i>Haliaeetus leucogaster</i>	White-bellied Sea-eagle	No	Species is vagrant and unlikely to breed in Biodiversity Assessment Area due to lack of regular food supply	Vulnerable	-
<i>Hamirostra melanosternum</i>	Black-breasted Buzzard	Yes	-	Vulnerable	-
<i>Hieraaetus morphnoides</i>	Little Eagle	Yes	-	Vulnerable	-
<i>Lasiorhinus latifrons</i>	Southern Hairy-nosed Wombat	No	Habitat is considered degraded and continues to be degraded by feral herbivores including goats and rabbits	Endangered	-
<i>Lophochroa leadbeateri</i>	Pink Cockatoo	Yes	-	Vulnerable	-

Please see below extract from Department of Climate Change, Energy and the Environment and Water. Eastern Major Mitchell's Cockatoo is another name for Pink Cockatoo.



Australian Government
Department of Climate Change, Energy,
the Environment and Water

Conservation Advice for *Lophochroa leadbeateri leadbeateri* (eastern Major Mitchell's cockatoo)

In effect under the *Environment Protection and Biodiversity Conservation Act 1999*
from 31 March 2023.

This document combines the approved conservation advice and listing assessment for the subspecies. It provides a foundation for conservation actions and further planning.

Conservation status

Lophochroa leadbeateri leadbeateri was assessed by the Threatened Species Scientific Committee to be eligible for listing under criterion as Endangered under criterion 1. The Committee's assessment is at Attachment A. The Committee's assessment of the species' eligibility against each of the listing criteria is:

- Criterion 1: A2bce: Endangered

Page 6-57, Field Surveys Results: The table lists that there are no pink cockatoos present and no further assessment required. The table also lists that there are no bitter quandong's present and no further assessment required.

We know that both the Quandong and Pink Cockatoo are present on our farm (see above photos taken 23/01/2024). There have been very limited studies conducted on our property to identify at risk species. Some of the studies conducted were done in the middle of a severe drought.

Copi Mineral Sands Project

Table 6.3.7 (Cont'd)
Species Credit Species Field Survey Results

Page 2 of 2

Common Name	Scientific Name	Listing Status		Survey Method	Present?	Further Assessment Required?
		BC Act	EPBC Act			
Flora Species (Cont'd)						
Desert Hopbush	<i>Dodonaea stenozyga</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Fleshy Minuria	<i>Kippistia suaeidifolia</i>	Endangered	-	Targeted threatened species survey	No	No
Pink Velvet Bush	<i>Lasiopetalum behrii</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Button Immortelle	<i>Leporhynchos waitza</i>	Endangered	-	Targeted threatened species survey	No	No
Cobar Greenhood Orchid ¹	<i>Pterostylis cobarensis</i>	Vulnerable	-	Assumed present	Assumed present	Yes
Bitter Quandong	<i>Santalum murrayanum</i>	Endangered	-	Targeted threatened species survey	No	No
Bladder Senna	<i>Swainsona colutoides</i>	Endangered	-	Targeted threatened species survey	No	No
Yellow Swainson-pea	<i>Swainsona pyrophila</i>	Vulnerable	-	Targeted threatened species survey	No	No
Silky Swainson-pea	<i>Swainsona sericea</i>	Vulnerable	-	Targeted threatened species survey	No	No
Fauna Species						
Striated Grasswren	<i>Amytornis striatus</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Bush Stone-curlew	<i>Burhinus grallarius</i>	Endangered	-	Targeted threatened species survey	No	No
Black-breasted Buzzard	<i>Hamirostra melanosternum</i>	Vulnerable	-	Targeted threatened species survey	No	No
Little Eagle	<i>Hieraetus morphnoides</i>	Vulnerable	-	Targeted threatened species survey	No	No
Pink Cockatoo	<i>Lophochroa leadbeateri</i>	Vulnerable	-	Targeted threatened species survey	No	No
Square-tailed Kite	<i>Lophoictinia isura</i>	Vulnerable	-	Targeted threatened species survey	No	No
Crowned Gecko	<i>Lucasium stenodactylum</i>	Vulnerable	-	Targeted threatened species survey	No	No
Black-eared Miner	<i>Manorina melanotis</i>	Critically Endangered	Endangered	Targeted threatened species survey	No	No
Red-lored Whistler	<i>Pachycephala rufogularis</i>	Critically Endangered	Vulnerable	Targeted threatened species survey	No	No
Desert Mouse	<i>Pseudomys desertor</i>	Critically Endangered	-	Targeted threatened species survey	No	No
Note 1: The Applicant will undertake targeted survey for the Cobar Greenhood Orchid (<i>Pterostylis cobarensis</i>) during the assessment period for the Project and would amend or update the BDAR as required once complete.						
Source: EnviroKey (2024) – After Tables 31 and 32						



Photos of Quandong fruit and tree on our farm, photos taken 2023.

Appendix 12, Air Quality Impact Assessment, Page 80: 'Background annual average PM10 and PM2.5 concentrations adopted in modelling are already in exceedance of the relevant criteria, and the

incremental impacts associated with the construction and operation of the Project are demonstrated to be low'

RZ has one of their dust monitors situated less than 100 meters from their main entry point to Warwick Station. Every vehicle that enters and exits the property creates a cloud of dust that then settles in the dust monitor. This is flawed and unreliable data.

If the background level of dust is already in exceedance of the relevant criteria, any worsening of this level is not acceptable. We don't think this is acceptable or low risk, we worry about the cumulative health risk from any increases, and our exposure to this increase over 17 or more years. The impact to our stock is unknown, some of our paddocks will be right beside the mine pit, how will this affect our stock?

Appendix 14 Social Impact Assessment, page 53: *'In relation to the radioactive material extraction and handling and without mitigation, the Project is predicted to have an impact of medium significance (i.e. possible to occur, with moderate magnitude) on health and well-being in the social locality. The hazards assessment commissioned for the EIS specifies some measures to reduce the risk of radioactive effects to the community. These are discussed in Chapter 7.'*

Is any radiation risk acceptable? Let alone a moderate magnitude risk? The EIS states that our house, including our drinking water (rain water) will be located just 1.3km from the mine pit. The EIS suggests 'some measures' to reduce risk of radioactive effects, are these proven? What level of risk should our family accept living beside the mine site? Should we accept the moderate risk to our health so RZ, with a poor compliance record, can make a profit from their project? Can we trust that RZ will enforce these risk reduction measures? RZ has poor compliance with legislation. RZ has repeatedly made the same mistakes. The risk to our health if RZ makes mistakes, or cuts corners with radioactive material are unacceptable.

Appendix 14, Social Impact Assessment, page 55: *'The mine site's relative isolation, along with compensation agreements for nearby properties, helps reduce potential visual disturbances. Views from nearby roads and residences are limited, and any impact is considered insignificant due to factors such as road closures during mining operations and existing environmental features.'*

RZ Resources has no compensation agreement with us. RZ Resources may consider the impact insignificant, our family, who will have to live 1.3km from the open pit does not consider this insignificant. We will be able to see and hear this mine site for more than 17 years. Some of the mine pit will be on lower ground than our house, we will be able to look down into the pit from many vantage points on our farm.

Appendix 14, Social Impact Assessment, page 56: *'Medical services and facilities are available in Dareton and Wentworth, with Wentworth District Hospital offering a 24-hour emergency service'*

This is not true. Wentworth District Hospital does not offer a 24-hour emergency service. The NSW Health website states 'Wentworth Health Service is a small rural hospital and health service that provides 24-hour nurse-led first aid services, and post-acute inpatient care'. This is NOT an emergency service. This is an example of the poor quality and inaccurate information in this EIS. RZ talks about having staff living in the local community, local residents know you don't go to the Wentworth Hospital when you are having a heart attack, or you have broken your leg.

Appendix 14, Social Impact Assessment, page 61: *'Evening operations were reduced or eliminated from Project plan. The aim of the refinement was to reduce potential evening noise impacts for the remaining landholder (all other landholders executed property purchase agreements).'*

This is a misleading statement. Only one landholder has executed a purchase agreement. The wording makes it sound like multiple parties have agreed to a purchase, and only one landholder (me) is being stubborn.

Appendix 14, Social Impact Assessment, page 62: *'It is expected that movements of personnel and mining equipment would be highly controlled if the Project proceeds and in comparison to the exploration phase of the Project.'*

The mine only proposes to control mine vehicles. Many workers and contractors will travel to site (camp) in their own vehicles, and will travel on whatever route they please. This will increase traffic on surrounding roads, increasing road damage, accidents, death of livestock where roads pass through paddocks, livestock theft, road rubbish and risk of biosecurity breaches. The condition of local roads will deteriorate. These are the roads we use to travel to town and run our business. We depend on these roads. RZ should commit to the maintenance of the public roads that their project will impact, not just the haul road.

Appendix 14, Social Impact Assessment, page 63: *'a number of protective measures to reduce the risk of radiation to the community. They include:*

- *Minimisation of dust generation and inhalation during production, storage, and transport through design, restricted access, and if necessary, the use of respiratory protection;*

Does RZ propose to control wind, dust storms, whirly winds, and the weather to prevent the risk of radiation exposure to the surrounding community? Significant wind and consequent dust storms are common in this area. The lack of detail on the specific control measures is very concerning to us. Will they protect our dam water? How will they prevent mine dust from covering all our property and its vegetation, the source of food for our goat business.

Appendix 15, Economic Impact Assessment, page 16 of 89: *'Impacts directly attributable to the project, in particular investments associated with developing and operating the coal mine, and revenues generated by the sale of coal'*

I was under the impression the project was to mine Mineral Sands, not coal. Another example of the poor quality of this EIS.

Summary

This objection is not my complete objection. I have had limited time to read the EIS and prepare my objection. I have many more concerns that I have not been able to document here. I have requested an extension to submit my objection, but this has not been granted. I reserve the right to raise further issues and objections as more information comes to my attention.

My wife Ferna Vagg has prepared an objection to this project. I support the issues that are raised in her objection in addition to those raised in my objection.

I believe the EIS document is not a true representation of the environment where the project is planned. I live in this environment, and I know it intimately, the EIS does not reflect what I see and experience daily. If this project is approved who will be liable for the shortcomings? It is offensive that this EIS claims that my residence, 1.3km away, would not be affected.

In summary, RZ has shown a poor compliance record with their exploration activities to date. They have had more than 100 breaches of NSW Mining legislation so far. How can we believe that this company will now be responsible and follow legislation closely, and safely handle and manage

radioactive material? When is it that RZ will start following legislation? The consequences to our health, business and environment from RZ's proposed project are far too serious for us to support. We feel that RZ does not have a social licence. We have been treated poorly by RZ on many occasions. We do not trust RZ. We request there be a condition imposed that RZ Resources must not carry out any development work on either or both of Sunshine and Huntingfield stations until after the settlement of a purchase, lease or licence of these properties from the owner.

Thank you for taking the time to consider my concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Shane Vagg', with a stylized flourish at the end.

Shane Vagg.