

23 February 2018

Clay Preshaw
Department of Planning and Environment
GPO BOX 39
SYDNEY NSW 2001

Dear Clay,

**RE: CLEAN TEQ SUNRISE PROJECT – ACCOMMODATION CAMP MODIFICATION (MOD 6)
RESPONSES TO SUBMISSIONS**

Background

The Clean TeQ Sunrise Project (the Project) is an approved nickel cobalt scandium mining project situated approximately 350 kilometres west-northwest of Sydney, near the village of Fifield, New South Wales (NSW).

Development Consent DA 374-11-00 for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act) in 2001.

Scandium21 Pty Ltd owns the rights to develop the Project and is a wholly owned subsidiary of Clean TeQ Holdings Limited (Clean TeQ).

In January 2018, Clean TeQ submitted an application to modify Development Consent DA 374-11-00 under section 75W of the EP&A Act (the Modification). The modification application included the *Clean TeQ Sunrise Project Accommodation Camp Modification Environmental Assessment* (the EA).

The EA was placed on public exhibition by the Department of Planning and Environment (DP&E) from 23 January 2018 to 7 February 2018. During this period, Government agencies and members of the public were invited to provide submissions on the EA to the DP&E.

The DP&E has requested that Clean TeQ review and respond to the submissions that were received on the EA. Clean TeQ's responses to submissions has been structured in consideration of the *Draft Environmental Impact Assessment Guidance Series June 2017 – Responding to Submissions* (DP&E, 2017).

Overview of Exhibited Modification

An accommodation camp is approved to be located on the western side of the mine site in the vicinity of Wilmatha Road. The approved accommodation camp will be used during the construction phase of the Project and will have accommodation facilities for approximately 1,000 personnel.

As part of detailed planning for the construction phase of the Project, Clean TeQ identified an alternative location for the approved accommodation camp that would provide improved amenity for the workforce in the accommodation camp and minimise potential operational constraints at the mine site. Clean TeQ also identified the preference to maintain the accommodation camp (at reduced capacity) during operations for the short-term use of temporary contractors and visitors.

The proposed changes to the approved accommodation camp is referred to as the Accommodation Camp Modification (the Modification) and would include:

- development of the accommodation camp (including supporting infrastructure) at an alternative location approximately 4 kilometres to the south of the mine site;
- construction of an electricity transmission line and water pipeline from the mine site to the modified accommodation camp site;
- minor road upgrades;
- increased accommodation camp capacity (from approximately 1,000 to 1,300 personnel); and
- the accommodation camp (at reduced capacity) would continue to be operated post-construction.

The Modification does not involve changes to any aspects of the approved mine and processing operations, limestone quarry, rail siding, borefields, water pipeline or gas pipeline.

Overview of Submissions

A total of nine submissions were received on the Modification from the following stakeholders:

- Environment Protection Authority;
- Crown Lands and Water (within the NSW Department of Industry);
- Office of Environment and Heritage;
- Roads and Maritime Services;
- Division of Resources and Geoscience (DRG) (within the DP&E);
- Lachlan Shire Council (LSC); and
- three community members.

Six of the submissions were from Government agencies, of which five were in the form of comments or suggested conditions and one, from the LSC, supported the Modification.

The three submissions were received from members of the public residing in the vicinity of the modified accommodation camp, with all three objecting to the Modification.

Actions Taken After Exhibition of the Modification

No further environmental assessment has been undertaken since the exhibition of the Modification following consideration of the submissions received.

As requested in the DRG's submission, Clean TeQ has notified Rimfire Pacific Mining NL and Australian Mines Limited of the Modification application. At the time of writing, neither Rimfire Pacific Mining NL nor Australian Mines Limited had responded.

Changes to the Modification

No changes have been made to the proposed Modification as a result of Clean TeQ's review of the various Government and public submissions on the Modification.

Responses to Submissions

Clean TeQ's responses to the submissions received are presented in Enclosure 1.

It comprises:

- Table 1 – Responses to Government Agency Submissions.
- Table 2 – Responses to Public Submissions.

Project Evaluation

Based on Clean TeQ's consideration of the submissions by regulatory agencies and members of the community, Clean TeQ considers the justification provided in the EA remain unchanged.

If any additional information or clarification is required, please do not hesitate to contact me.

Yours sincerely,

CLEAN TEQ HOLDINGS LIMITED



JOHN HANRAHAN

APPROVALS LEAD – CLEAN TEQ SUNRISE PROJECT

ENCLOSURE 1

RESPONSES TO SUBMISSIONS

Table 1
Responses to Government Agency Submissions

Number	Organisation	Submission	Clean TeQ Response
EPA-1	Environmental Protection Authority (EPA)	<p><i>With reference to the information supplied by the Department of Planning and Environment (DPE), the EPA notes that the proposed modification will not require an Environmental Protection Licence from the EPA.</i></p> <p><i>The EPA notes however, that the Sunrise Nickel/ Cobalt Mine will require an Environmental Protection licence (EPL) prior to the commencement of scheduled development (construction) works or scheduled activities for all works associated with the Sunrise mining operations which have been issued under the Development Consent DA 374-11-00.</i></p>	Clean TeQ Holdings Limited (Clean TeQ) acknowledges this requirement and will obtain an Environment Protection Licence prior to the commencement of the modified Project.
EPA-2	EPA	<p><i>The EPA recommends that the assessment for the proposal should consider the following general matters.</i></p> <p><i>Water quality impacts – identification of appropriate pollution control systems to protect surface and ground water resources such as sediment and erosion controls during construction and operational stages and inclusion of permanent sediment and erosion and stormwater controls where required.</i></p>	<p>An assessment of the potential water quality impacts associated with the Modification is included in Section 3.6.2 of the Environmental Assessment (EA). The assessment concluded that the Modification is predicted to not change to the potential water quality impacts associated with the approved Project.</p> <p>Sediment control structures would be employed where necessary within and downstream of the modified accommodation camp development areas. Sediment control structures would be designed, installed and maintained in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) in accordance with Condition 29, Schedule 3 of Development Consent DA 374-11-00 (Section 3.6.2 of the Environmental Assessment [EA]).</p> <p>The irrigation area would be managed in accordance with the <i>Environmental Guidelines Use of Effluent by Irrigation</i> (Department of Environment and Conservation, 2004) so as not to cause irrigation water runoff from the irrigation area (Section 3.6.2 of the EA).</p> <p>A Water Management Plan would be prepared for the modified Project in accordance with Condition 30, Schedule 3 of Development Consent DA 374-11-00 and would include a Surface Water Management Plan and Groundwater Management Plan. The Surface Water Management Plan and Groundwater Management Plan would include surface and groundwater monitoring programs (Section 3.6.3 of the EA).</p>

Number	Organisation	Submission	Clean TeQ Response
EPA-3	EPA	<p><i>The EPA recommends that the assessment for the proposal should consider the following general matters.</i></p> <p>...</p> <p><i>Noise – identify potential impacts and mitigation strategies to be incorporated during construction and operation to minimise noise and comply with NSW policies and legislation on noise control.</i></p>	<p>The potential noise impacts of the Modification were assessed in Section 3.8.2 of the EA. The assessment concluded that there would be no exceedances of relevant noise criteria at any privately-owned receivers.</p> <p>A Noise Management Plan would be prepared for the modified Project in accordance with Condition 9, Schedule 3 of Development Consent DA 374-11-00. The Noise Management Plan would relevantly include a noise monitoring program; details of protocols for measuring environmental performance and triggers for the investigation of additional mitigation measures; and complaint management protocols (Section 3.8.3 of the EA).</p> <p>The Noise Management Plan would also include a range of construction noise management and control measures, such as operating plant and machinery in a proper and efficient manner, regular maintenance of plant and conducting lesser noise generating activities (e.g. welding and electrical works) during the evening and night-time periods (Section 3.8.3 of the EA).</p>
EPA-4	EPA	<p><i>The EPA recommends that the assessment for the proposal should consider the following general matters.</i></p> <p>...</p> <p><i>Odour and Dust – identify impacts from odour and dust during the construction and operational periods and identify mitigative measures.</i></p>	<p>The potential air quality impacts of the Modification were assessed in Section 3.7.2 of the EA. The assessment concluded that there would be no exceedances of relevant air quality criteria at any privately-owned receivers.</p> <p>The modified accommodation camp would not include any significant sources of odour.</p> <p>An Air Quality Management Plan would be prepared for the modified Project in accordance with Condition 23, Schedule 3 of Development Consent DA 374-11-00. The Air Quality Management Plan would include air quality mitigation measures; an air quality monitoring program; details of protocols for measuring environmental performance and triggers for the investigation of additional mitigation measures; and complaint management protocols (Section 3.7.3 of the EA).</p> <p>The Air Quality Management Plan would also include a range of construction air quality management and control, such as imposing speed limits on all roads, minimisation of disturbance areas and the use of water carts to minimise excessive visible dust (Section 3.7.3 of the EA).</p>
EPA-5	EPA	<p><i>The EPA recommends that the assessment for the proposal should consider the following general matters.</i></p> <p>...</p> <p><i>Storage of chemicals/ fuels – ensure adequate control measures are in place for storages to reduce risk of spills contaminating waterways and land.</i></p>	<p>A range of mitigation measures would be implemented to reduce the risk of spills contaminating waterways and land, including appropriate bunding of consumable storage areas and regular inspection and maintenance of fuel storage areas (Section 3.2.3 of the EA).</p>

Number	Organisation	Submission	Clean TeQ Response
EPA-6	EPA	<p><i>The EPA recommends that the assessment for the proposal should consider the following general matters.</i></p> <p>...</p> <p><i>Waste management – options and strategies for waste minimisation, reuse and recycling should be assessed as appropriate.</i></p>	<p>The Modification would not significantly change waste generation or management at the Project. All waste generated at the Project would be disposed of at an appropriately licensed landfill in accordance with Condition 54, Schedule 3 of Development Consent DA 347-11-00.</p> <p>Also in accordance with Condition 54, Schedule 3 of Development Consent DA 347-11-00, Clean TeQ would:</p> <ul style="list-style-type: none"> • implement all reasonable and feasible measures to minimise the waste generated by the development; • classify all waste in accordance with the EPA's (2014) <i>Waste Classification Guidelines</i> (or its latest version); • store and handle all waste generated on site in accordance with its classification; and • not receive or dispose of any waste on site.
EPA-7	EPA	<p><i>It is recommended that in achieving a high standard of sediment and erosion controls and general site management the proponent, or any contractor engaged by the proponent, develop and implement the proposal in accordance with relevant guidelines such as the EPA endorsed publication "Soils and Construction, Volume 1, 4th Edition," March 2004 by Landcom.</i></p>	<p>Clean TeQ acknowledges this and all sediment control structures would be designed, installed and maintained in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) in accordance with Condition 29, Schedule 3 of Development Consent DA 374-11-00 (Section 3.6.2 of the EA).</p>
CL&W-1	Department of Industry – Crown Lands and Water (CL&W)	<p><i>That the final soil and land classification for the land should be achieved to a level that is at or better than the existing site capability as a key outcome for rehabilitation.</i></p>	<p>The final land use of the modified accommodation camp area (following rehabilitation) would be consistent with the current land use (i.e. agriculture [pasture for grazing]) (Section 2.4 of the EA).</p> <p>The soil and land classification of areas of the site that would be rehabilitated to agriculture areas would therefore be rehabilitated to be suitable for grazing activities.</p>
CL&W-2	CL&W	<p><i>The proponent is required to gain an authority to occupy Crown Land prior to the construction of the proposed water pipeline and electricity transmission line across a crown road.</i></p>	<p>Clean TeQ acknowledges this requirement and will work with CL&W to obtain relevant approvals before occupying any Crown Land required for the Project.</p>
CL&W-3	CL&W	<p><i>The proposed water supply pipeline, access road and camp facility either cross or are in close proximity to first order watercourses which feature degraded characteristics. The detailed design should ensure adequate mitigating measures are applied to address the potential erosion issues and should be in accordance with DoI Water's Guidelines for Controlled Activities on Waterfront Land.</i></p>	<p>Clean TeQ acknowledges this requirement and would design and operate the modified accommodation camp (including the water pipeline, electricity transmission line and site access road) generally in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (NSW Office of Water, 2012).</p>
CL&W-4	CL&W	<p><i>The proposed irrigation area is located adjacent to a first order watercourse near the existing Sunrise property homestead. The detailed design and management of the irrigation area should ensure adequate mitigating and monitoring measures are applied to prevent impacts to the quality and quantity of the watercourse. Adequate buffers should also be applied in accordance with DoI Water's Guidelines for Controlled Activities on Waterfront Land.</i></p>	<p>Clean TeQ acknowledges this requirement and would design and operate the modified irrigation area generally in accordance with the <i>Guidelines for Controlled Activities on Waterfront Land</i> (NSW Office of Water, 2012).</p>
CL&W-5	CL&W	<p><i>The proposed management of runoff in construction areas in accordance with the guideline, Managing Urban Stormwater: Soils and Construction is supported.</i></p>	<p>Acknowledged.</p>
CL&W-6	CL&W	<p><i>A Surface Water Management Plan and Irrigation Management Plan should be prepared and should address monitoring and mitigation measures for the construction and operational activities proposed in the modification.</i></p>	<p>Clean TeQ would prepare a Surface Water Management Plan for the modified Project (including the modified irrigation area) in accordance with Condition 30(b), Schedule 3 of Development Consent DA 374-11-00. The Surface Water Management Plan would include a description of the water management system and a monitoring program.</p>

Number	Organisation	Submission	Clean TeQ Response
OEH-1	Office of Environment & Heritage (OEH)	<i>... It is accepted that the area to be impacted was assessed in accordance with the Biodiversity Assessment Method and it was determined that the Vegetation Integrity Score is less than 17 and therefore no offset is required.</i>	Clean TeQ acknowledges OEH's position that no biodiversity offset is required for the Modification.
OEH-2	OEH	<i>The project received project approval in 2001 under section 76(A) & 80 of the Environmental Planning and Assessment Act 1979 and is in preparation for commencement under the modified section 75W approval. The Modification does not extinguish the National Parks and Wildlife Act 1974 (NPW Act) (s.90A). Due to the circumstances a variation to the current Aboriginal Heritage Impact Permit (AHIP) (#00003049) is not appropriate, consequently a new AHIP is required.</i>	Clean TeQ acknowledges OEH's position that a new Aboriginal Heritage Impact Permit would be required for the modified accommodation camp and will obtain a new Aboriginal Heritage Impact Permit prior to commencement of the modified accommodation camp.
RMS-1	Roads and Maritime Services (RMS)	<i>Safe Intersection Sight Distance (SISD) requirements outlined in the Austroads Guide to Road Design Part 4A and relevant Roads and Maritime supplements are to be provided and maintained in both directions at the vehicular access point from Sunrise Lane to the accommodation camp.</i>	Clean TeQ acknowledges this requirement and all road and intersection upgrades undertaken for the Project would be undertaken in accordance with Austroads (2013) <i>Guide to Road Design</i> .
DRG-1	Division of Resources and Geoscience (DRG)	<p><i>The proposed site is covered by current Exploration Licences for Group 1 Minerals as shown in Figure 1. Exploration Licence 5534 (Act 1992) held by Rimfire Pacific Mining N.L. (Rimfire Pacific) partially covers the eastern extent of the proposed site. This title is associated with the Fijfield Platinum Project which hosts the "Sorpresa" gold/silver deposit. Exploration Licence 8478 (Act 1992) held by Australian Mines Limited (AUZ) partially covers the western extent of the proposed site.</i></p> <p><i>Based on the regional geology, geophysical surveys as well as current and historical exploration, the regional area is considered highly prospective for scandium, nickel, cobalt, gold, silver, copper, platinum and minor base metals (Refer to Figure 1).</i></p> <p><i>Whilst the proposed modified accommodation camp appears to have been sited to the south of priority resource target areas, potential may remain for the camp and associated water and electricity infrastructure to sterilise mineral resources.</i></p> <p><i>The Division requires the proponent to consult with titleholders to establish if the proposal is likely to have significant impact on current or future mineral exploration, recovery or extraction.</i></p> <p><i>The Proponent is to provide evidence of authentic consultation with titleholders to the Division; this will include a letter of notification of the proposal and a letter of response from titleholders. If responses are not received from titleholders, the Proponent is to contact the Division.</i></p>	<p>Clean TeQ notified Rimfire Pacific Mining NL and Australian Mines Limited that it has submitted the Modification application on 20 and 21 February 2018, respectively (Attachment 1). At the time of writing, neither Rimfire Pacific Mining NL nor Australian Mines Limited had responded.</p> <p>In regard to the potential for the Modification to interact with any potential Rimfire Pacific Mining NL or Australian Mines Limited projects, Clean TeQ notes the following:</p> <ul style="list-style-type: none"> • the modified accommodation camp is located on Clean TeQ owned land; • neither Rimfire Pacific Mining NL nor Australian Mines Limited made a submission on the Modification; • neither Rimfire Pacific Mining NL nor Australian Mines Limited currently have an application for a project on the modified accommodation camp area; and • neither Rimfire Pacific Mining NL nor Australian Mines Limited have consulted with Clean TeQ regarding potential exploration activities or developments on the modified accommodation camp area.
DRG-2	DRG	<i>Should biodiversity offsets be considered for this project, the Division requests consultation to ensure there is no potential resource sterilisation.</i>	No biodiversity offset is required for the modified Project (refer to the response to OEH-1).

Number	Organisation	Submission	Clean TeQ Response
LSC-1	Lachlan Shire Council (LSC)	<p>Roads</p> <p>a) <i>the proposed modification to the accommodation camp will increase the number of light vehicle movements along haul and non-haul roads. This should necessitate a review of the Draft Road Transport Assessment to include the impacts of this change on local and regional roads.</i></p> <p>b) <i>It is noted that Sunrise Lane has been included in the Modification for reconstruction as a gravel sheeted road. Lachlan Shire Council (LSC) seeks confirmation that this will form part of the road upgrade package. Further, subject to the review of the Draft Road Transport Assessment, LSC considers that Sunrise Lane should be constructed and bitumen sealed.</i></p> <p>c) <i>The proposed relocation and increased capacity of the accommodation camp will result in a significant increase in traffic volumes during the construction and operational phases on the project. This is particularly relevant in Wilmatha Road where the increased traffic conflict raises serious traffic safety concerns around dust issues if the development is approved without a requirement to upgrade and bitumen seal the roads.</i></p> <p>d) <i>The above points should be considered in a review of the Draft Road Transport Assessment and LSC considers that all required road upgrades should be completed prior to construction activities commencing on the development.</i></p>	<p>The Clean TeQ Sunrise Project Modification 4 Road Transport Assessment Road Transport Assessment (GTA Consultants, 2017) considered the potential road transport implications of the modified accommodation camp. Clean TeQ therefore considers that no additional Road Transport Assessment is required for the Modification.</p> <p>The Modification would increase vehicle movements on Wilmatha Road and Sunrise Lane, however the Modification would have a negligible effect on the operation of the key access routes of the wider road network in the region (GTA Consultants, 2017).</p> <p>In accordance with Development Consent DA 374-11-00, Clean TeQ would upgrade Wilmatha Road between Slee Street in Fifield and the mine site prior to commissioning of the mine and processing facility (Section 2.3 of the EA). The Wilmatha Road upgrade would include two <u>sealed</u> travel lanes of 3.5 metre (m) width; 0.5 m <u>sealed</u> shoulders on each side; and 1.0 m gravel shoulders on each side.</p> <p>In addition to the Wilmatha Road upgrade, GTA Consultants (2017) recommended the following road upgrades for the Modification (Section 2.3 of the EA):</p> <ul style="list-style-type: none"> • upgrade Sunrise Lane between Wilmatha Road and the modified accommodation camp access road (consistent with a Class 4A unsealed road); and • remove the transition between the gravel and dirt surfaces at the intersection of Wilmatha Road and Sunrise Lane while Wilmatha Road remains unsealed and then seal a minimum of 30 m of Sunrise Lane on the approach to the intersection once Wilmatha Road is sealed. <p>Clean TeQ would undertake these upgrades to Sunrise Lane and this would be included in the Voluntary Planning Agreement (VPA) with the LSC. Clean TeQ will continue to work with the LSC regarding the finalisation of the VPA prior to the commencement of construction of the Project in accordance with Condition 17, Schedule 2 of Development Consent DA 374-11-00.</p> <p>GTA Consultants (2017) concluded, with the implementation of the identified mitigation measures, the Modification would have no significant impacts on the performance, safety, efficiency and capacity of the road network.</p>
LSC-2	LSC	<p><i>The proposal introduces an additional private water pipeline to service the accommodation camp which has not previously been considered. The pipeline will cross the Wilmatha Road reserve and a licence agreement should be negotiated between LSC and the applicant to protect the interests of both parties.</i></p>	<p>Clean TeQ acknowledges that additional approvals will be required for the accommodation camp water pipeline crossing of Wilmatha Road and Clean TeQ would obtain relevant approvals in consultation with the LSC.</p>

Number	Organisation	Submission	Clean TeQ Response
LSC-3	LSC	<i>The Modification Environmental Assessment does not consider the important issue of waste management generated by the increased capacity of the accommodation camp. It is considered that a Waste Management Strategy should be developed by the applicant to address all waste management issues associated with the development. The strategy should be submitted for the consideration of the Department and LSC and any necessary waste facility upgrades including transport impacts should be addressed in the modification approval.</i>	<p>The Modification would not significantly change waste generation or management at the Project. All waste generated at the Project would be disposed of at an appropriately licensed landfill in accordance with Condition 54, Schedule 3 of Development Consent DA 347-11-00.</p> <p>Also, in accordance with Condition 54, Schedule 3 of Development Consent DA 347-11-00, Clean TeQ would:</p> <ul style="list-style-type: none"> • implement all reasonable and feasible measures to minimise the waste generated by the development; • classify all waste in accordance with the EPA's (2014) <i>Waste Classification Guidelines</i> (or its latest version); • store and handle all waste generated on site in accordance with its classification; and • not receive or dispose of any waste on site.
LSC-4	LSC	<i>The proposed modification impacts on the scope of the current VPA negotiations regarding the VPA under modification 4. Would the Department and Applicant please advise Council whether Modification 6 changes are to be included in the current negotiations or will they be considered in a separate negotiation at a later date?</i>	Clean TeQ will continue to work with the LSC regarding the finalisation of the VPA prior to the commencement of construction of the Project in accordance with Condition 17, Schedule 2 of Development Consent DA 374-11-00.

Table 2
Responses to Public Submissions

Issue ID No	Subject	Issue Raised	Clean TeQ Response
1	Road Transport	Concern was raised that additional traffic between the modified accommodation camp and the mine site would affect the condition of Wilmatha Road, reducing safety on this road.	<p>The potential road transport implications of the Modification were considered in the Clean TeQ Sunrise Project Modification 4 Road Transport Assessment (GTA Consultants, 2017).</p> <p>The Modification would increase vehicle movements on Wilmatha Road and Sunrise Lane, however the Modification would have a negligible effect on the operation of the key access routes of the wider road network in the region (GTA Consultants, 2017).</p> <p>In accordance with Development Consent DA 374-11-00, Clean TeQ would upgrade Wilmatha Road between Slee Street in Fifield and the mine site prior to commissioning of the mine and processing facility (Section 2.3 of the EA). The Wilmatha Road upgrade would include two <u>sealed</u> travel lanes of 3.5 m width; 0.5 m <u>sealed</u> shoulders on each side; and 1.0 m gravel shoulders on each side.</p> <p>Sealing Wilmatha Road would effectively eliminate dust generation on this road.</p> <p>In addition to the Wilmatha Road upgrade, GTA Consultants (2017) recommended the following road upgrades for the Modification (Section 2.3 of the EA):</p> <ul style="list-style-type: none"> • upgrade Sunrise Lane between Wilmatha Road and the modified accommodation camp access road (consistent with a Class 4A unsealed road); and • remove the transition between the gravel and dirt surfaces at the intersection of Wilmatha Road and Sunrise Lane while Wilmatha Road remains unsealed and then seal a minimum of 30 m of Sunrise Lane on the approach to the intersection once Wilmatha Road is sealed. <p>Clean TeQ would undertake these upgrades to Sunrise Lane and this would be included in the VPA with the LSC. Clean TeQ will continue to work with the LSC regarding the finalisation of the VPA prior to the commencement of construction of the Project in accordance with Condition 17, Schedule 2 of Development Consent DA 374-11-00.</p>

Issue ID No	Subject	Issue Raised	Clean TeQ Response
2	Community Services and Infrastructure	Concerns were raised that the Modification would affect the availability and condition of community services and infrastructure (e.g. emergency services) and would have limited benefits to the local community.	<p>The Modification would not change the approved construction workforce size or accommodation strategy (i.e. the majority of the construction workforce would reside in the accommodation camp) and therefore there would be no material alteration to the approved population and community services and infrastructure demand during the construction phase.</p> <p>The operational phase of the modified Project would include a reduced capacity accommodation camp for the short-term use of temporary contractors and visitors (e.g. short-term contractors present during scheduled processing plant maintenance shutdowns). No permanent employees or contractors would reside in the modified accommodation camp on a full-time basis. The availability of the accommodation would minimise the potential community services and infrastructure impacts associated with temporary contractors and visitors during operations.</p> <p>Clean TeQ would include a code of conduct for workers with regard to behaviour while staying in the accommodation camp in the induction program.</p> <p>In accordance with Condition 17, Schedule 2 of Development Consent DA 374-11-00, Clean TeQ would enter into VPAs with the LSC, Parkes Shire Council and Forbes Shire Council that will include funding for road upgrades, ongoing road maintenance and other community enhancement contributions during the construction and operation of the Project. Clean TeQ will continue to work with the councils regarding the finalisation of the VPAs prior to the commencement of construction of the Project in accordance with Condition 17, Schedule 2 of Development Consent DA 374-11-00.</p> <p>In addition to the above, Clean TeQ also intends to support a range of community initiatives in the region, including charities, sporting and cultural endeavours and community events.</p>
3	Regional Economic Impacts	Concern was raised that the Modification would not encourage stimulation of the local economy.	<p>The modified Project would provide employment opportunities for approximately 300 personnel during the operational phase.</p> <p>Clean TeQ would also pay substantial royalties and other taxes to the NSW Government, as well as annual community contributions to LSC, Parkes Shire Council and Forbes Shire Council in accordance with the VPAs.</p> <p>In addition to the first-round effect described above, the modified Project is expected to give rise to incremental flow-on impacts on the regional economy associated with additional disposable income and direct benefits to businesses and their employees in the region associated with additional operating expenditures.</p> <p>Clean TeQ would use local suppliers preferentially where local producers can be cost and quality competitive.</p>
4	Fly-in/Fly-out Workforce	Concerns were raised that the Modification would result in the utilisation of fly-in/fly-out (FIFO) operational employees and reduce employment opportunities for local residents.	<p>The Modification does <u>not</u> propose the use of FIFO operational workforce.</p> <p>The operational phase of the modified Project would include a reduced capacity accommodation camp for the short-term use of temporary contractors and visitors (e.g. short-term contractors present during scheduled processing plant maintenance shutdowns). No permanent employees or contractors would reside in the modified accommodation camp on a full-time basis.</p> <p>Clean TeQ would include a code of conduct for workers with regard to behaviour while staying in the accommodation camp in the induction program.</p>

Issue ID No	Subject	Issue Raised	Clean TeQ Response
5	Surface Water Resources	Concern was raised that the modified accommodation camp would impact downstream surface water resources (e.g. Bogan River).	<p>The Modification would result in very minor changes to flows in local drainage lines in the vicinity of the modified accommodation camp due to the capture of drainage from construction areas during the construction phase and from the utilities area during the operations phase. These captured areas would represent less than 0.01% of the Bogan River catchment and therefore the Modification is expected to result in negligible change to the approved flow impacts in the Bogan River.</p> <p>Clean TeQ would implement a range of measure to minimise potential water quality impacts on downstream surface water resources, including (Section 6.3.2 of the EA):</p> <ul style="list-style-type: none"> Sediment control structures such as sediment dams and sediment fences would be employed where necessary within and downstream of disturbance areas. Sediment control structures would be designed, installed and maintained in accordance with <i>Managing Urban Stormwater: Soils and Construction</i> (Landcom, 2004) in accordance with Condition 29, Schedule 3 of Development Consent DA 374-11-00. The irrigation area would be managed in accordance with the <i>Environmental Guidelines Use of Effluent by Irrigation</i> (DEC, 2004). <p>With these controls in place, the Modification is predicted to have no change to the approved potential water quality impacts in the receiving drainage lines.</p>

Table 3
Summary of Public Submissions and Issues Raised

ID	Name	Location	Issue Raised
243133	Des Ward	Tullamore	1, 2, 3, 4, 5
243071	Garry Sunderland	Fifield	1, 2, 3, 5
243301	Warwick Laing	Condobolin	1

ATTACHMENT 1

RIMFIRE PACIFIC MINING NL
AND
AUSTRALIAN MINES LIMITED
NOTIFICATION LETTERS

20 February 2018

John Kaminsky
Rimfire Pacific Pty Ltd
Suite 411
530 Little Collins Street
MELBOURNE VIC 3000

Dear John,

RE: Clean TeQ Sunrise Project – Notification of the Accommodation Camp Modification (MOD6) Application

The purpose of this letter is to notify Rimfire Pacific Pty Ltd of the *Clean TeQ Sunrise Project Accommodation Camp Modification* (the Modification). Further detail of the Modification is provided below.

Background

The Clean TeQ Sunrise Project (the Project) is an approved nickel cobalt scandium mining project situated approximately 350 kilometres west-northwest of Sydney, near the village of Fifield, New South Wales (NSW).

Development Consent DA 374-11-00 for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act) in 2001.

Scandium21 Pty Ltd owns the rights to develop the Project and is a wholly owned subsidiary of Clean TeQ Holdings Limited (Clean TeQ).

In January 2018, Clean TeQ submitted an application to modify Development Consent DA 374-11-00 under section 75W of the EP&A Act (the Modification). The modification application included the *Clean TeQ Sunrise Project Accommodation Camp Modification Environmental Assessment* (the EA).

Overview of the Accommodation Camp Modification

A temporary accommodation camp is approved to be located on the western side of the mine site in the vicinity of Wilmatha Road (Figures 1a and 1b). The approved accommodation camp will be used during the construction phase of the Project and will have accommodation facilities for approximately 1,000 personnel.

As part of detailed planning for the construction phase of the Project, Clean TeQ has identified an alternative location for the approved temporary accommodation camp that would provide improved amenity for the workforce in the accommodation camp and minimise potential operational constraints at the mine site. Clean TeQ also identified the preference to maintain the accommodation camp (at reduced capacity) during operations for the short-term use of temporary contractors and visitors.

These proposed changes to the approved accommodation camp is referred to as the Accommodation Camp Modification (the Modification) and would include:

- development of the accommodation camp (including supporting infrastructure) at an alternative location approximately 4 kilometres to the south of the mine site;
- construction of an electricity transmission line and water pipeline from the mine site to the modified accommodation camp site;
- minor road upgrades;
- increased accommodation camp capacity (from approximately 1,000 to 1,300 personnel); and
- the accommodation camp (at reduced capacity) would continue to be operated post-construction.

A conceptual general arrangement of the modified accommodation camp is provided on Figures 1a and 1b.

The modified temporary accommodation camp is located on Clean TeQ owned land within Exploration Licence 5534.

The proposed modified accommodation camp is sited to the south of any defined resources and potential priority resource target areas that we are aware of, however, could you please advise, based on your investigation and assessment of the underlying geology, if the proposal is likely to have significant impact on current or future mineral exploration, recovery or extraction?

A detailed description of the Modification is provided in the EA which is available on the NSW Department of Planning and Environment's website:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9040

Please contact the undersigned should you have any questions.

Yours sincerely,

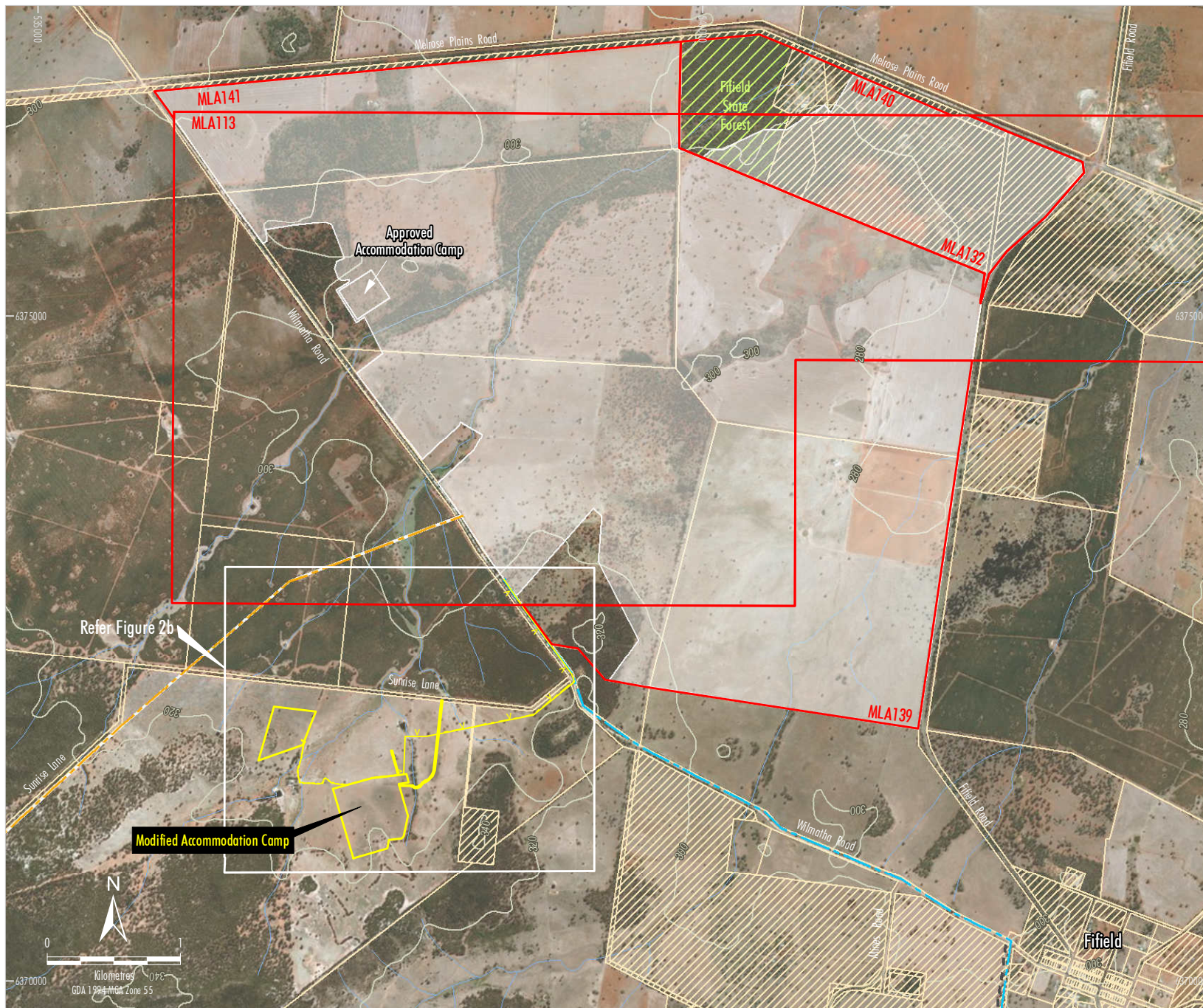
CLEAN TEQ HOLDINGS LIMITED



BEN STOCKDALE
CHIEF FINANCIAL OFFICER

ENCLOSURE 1

FIGURES



LEGEND

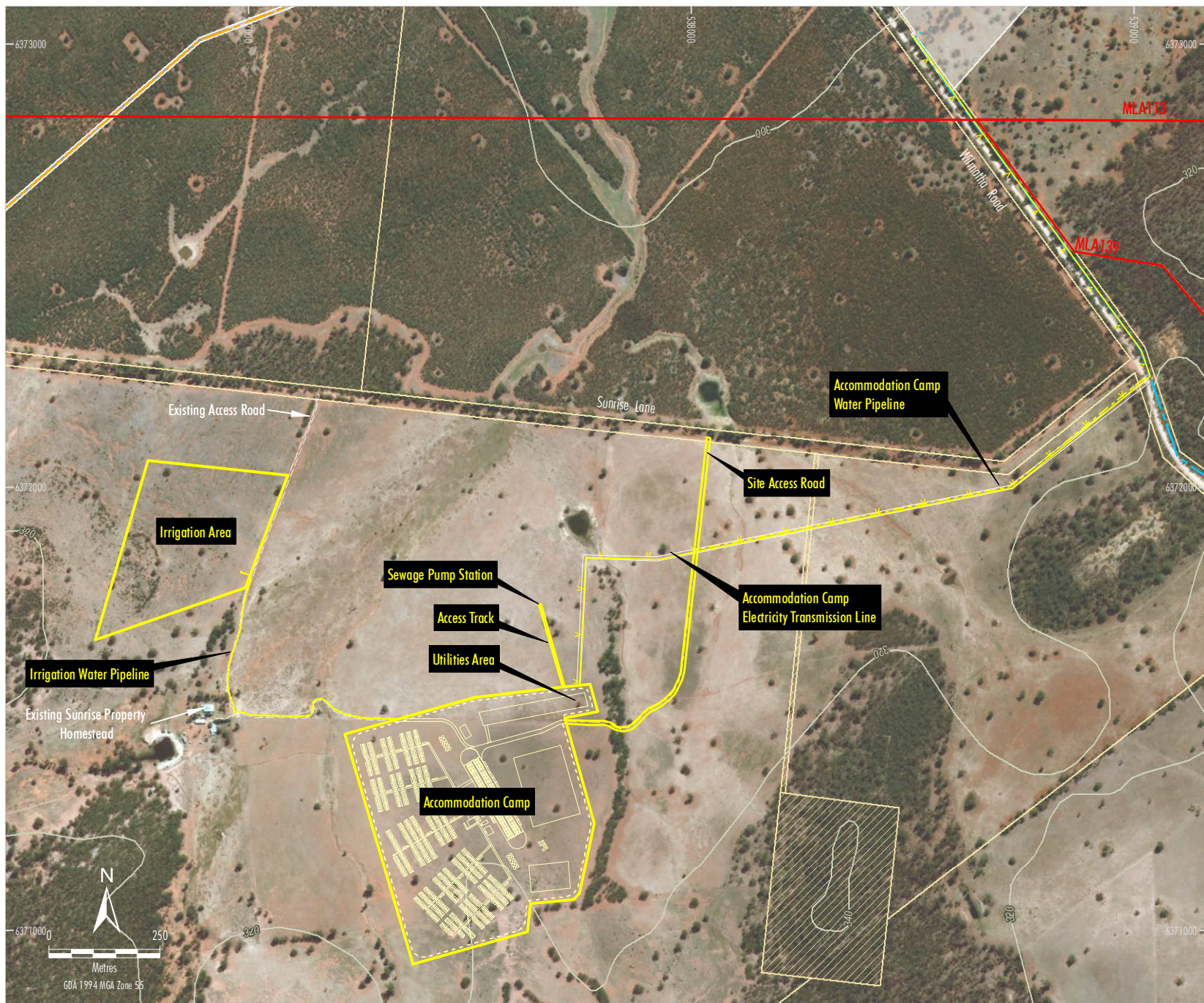
- Mining Lease Application Boundary
- Approved Surface Development Area
- Approved Fildes Bypass
- Approved Gas Pipeline
- Approved Water Pipeline
- State Forest
- Property Boundary
- Crown Land
- Modified Layout

Source: Black Range Minerals (2000); NSW Department of Industry (2017); NSW Land & Property Information (2017)
NSW Imagery: Esri Basemap

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CLEAN TEQ SUNRISE PROJECT
Conceptual Modified General Arrangement

Figure 1a



- LEGEND**
- Mining Lease Application Boundary
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 - Approved Gas Pipeline
 - Approved Water Pipeline
 - Property Boundary
 - Crown Land
 - Modified Layout

Source: Black Range Minerals (2000); NSW Department of Industry (2017); NSW Land & Property Information (2017)
 NSW Imagery: Esri Basemap



CLEAN TEQ SUNRISE PROJECT
 Conceptual Modified General Arrangement
 Inset

Figure 1b

21 February 2018

Benjamin Bell
Australian Mines Limited
Level 1
83 Havelock Street
WEST PERTH WA 6005

Dear Benjamin,

RE: Clean TeQ Sunrise Project – Notification of the Accommodation Camp Modification (MOD6) Application

The purpose of this letter is to notify Australian Mines Limited of the *Clean TeQ Sunrise Project Accommodation Camp Modification* (the Modification). Further detail of the Modification is provided below.

Background

The Clean TeQ Sunrise Project (the Project) is an approved nickel cobalt scandium mining project situated approximately 350 kilometres west-northwest of Sydney, near the village of Fifield, New South Wales (NSW).

Development Consent DA 374-11-00 for the Project was issued under Part 4 of the NSW *Environmental Planning and Assessment Act, 1979* (EP&A Act) in 2001.

Scandium21 Pty Ltd owns the rights to develop the Project and is a wholly owned subsidiary of Clean TeQ Holdings Limited (Clean TeQ).

In January 2018, Clean TeQ submitted an application to modify Development Consent DA 374-11-00 under section 75W of the EP&A Act (the Modification). The modification application included the *Clean TeQ Sunrise Project Accommodation Camp Modification Environmental Assessment* (the EA).

Overview of the Accommodation Camp Modification

A temporary accommodation camp is approved to be located on the western side of the mine site in the vicinity of Wilmatha Road (Figures 1a and 1b). The approved accommodation camp will be used during the construction phase of the Project and will have accommodation facilities for approximately 1,000 personnel.

As part of detailed planning for the construction phase of the Project, Clean TeQ has identified an alternative location for the approved temporary accommodation camp that would provide improved amenity for the workforce in the accommodation camp and minimise potential operational constraints at the mine site. Clean TeQ also identified the preference to maintain the accommodation camp (at reduced capacity) during operations for the short-term use of temporary contractors and visitors.

These proposed changes to the approved accommodation camp is referred to as the Accommodation Camp Modification (the Modification) and would include:

- development of the accommodation camp (including supporting infrastructure) at an alternative location approximately 4 kilometres to the south of the mine site;
- construction of an electricity transmission line and water pipeline from the mine site to the modified accommodation camp site;
- minor road upgrades;
- increased accommodation camp capacity (from approximately 1,000 to 1,300 personnel); and
- the accommodation camp (at reduced capacity) would continue to be operated post-construction.

A conceptual general arrangement of the modified accommodation camp is provided on Figures 1a and 1b.

The modified temporary accommodation camp is located on Clean TeQ owned land within Exploration Licence 8478.

The proposed modified accommodation camp is sited to the south of any defined resources and potential priority resource target areas that we are aware of, however, could you please advise, based on your investigation and assessment of the underlying geology, if the proposal is likely to have significant impact on current or future mineral exploration, recovery or extraction?

A detailed description of the Modification is provided in the EA which is available on the NSW Department of Planning and Environment's website:

http://majorprojects.planning.nsw.gov.au/index.pl?action=view_job&job_id=9040

Please contact the undersigned should you have any questions.

Yours sincerely,

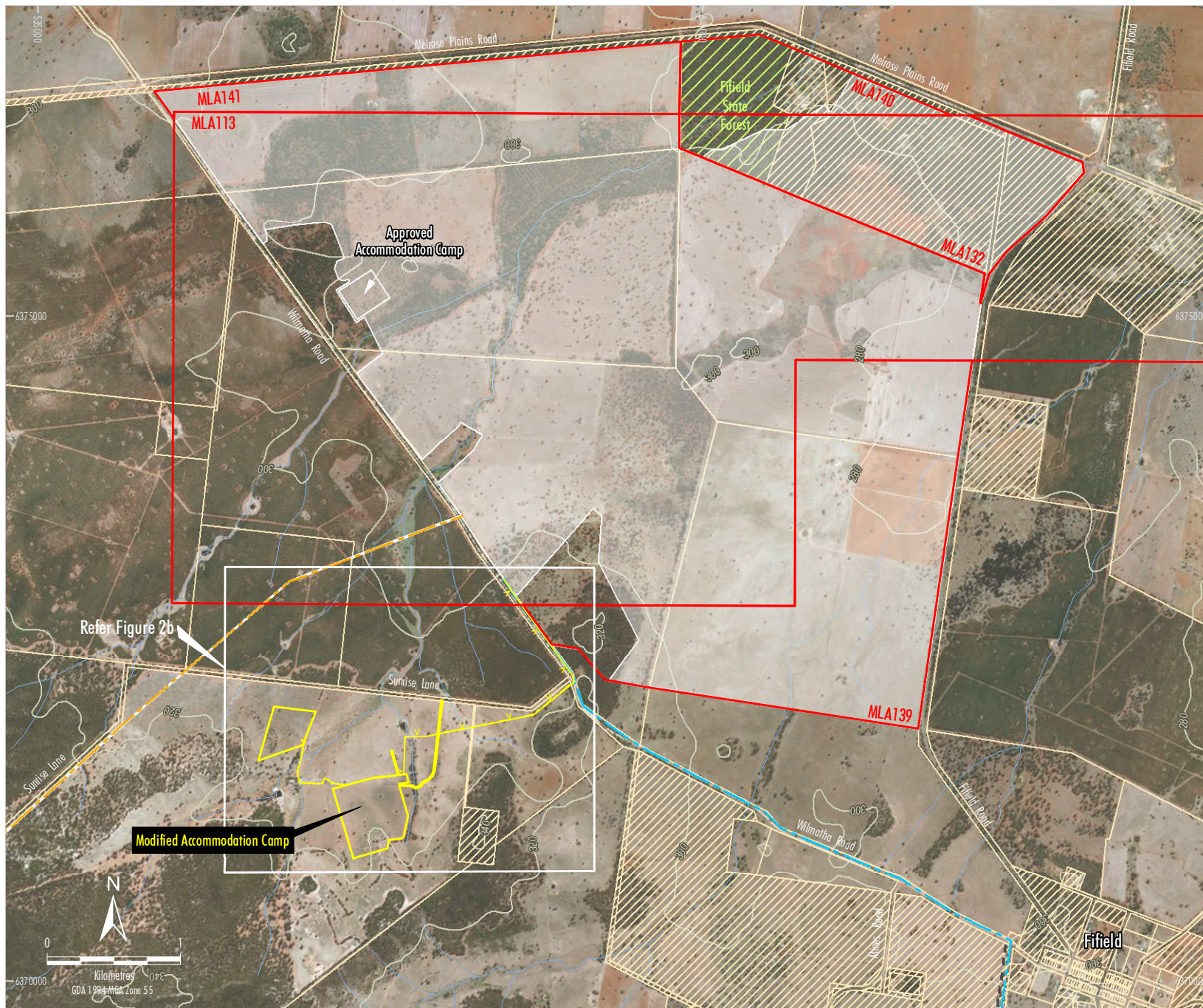
CLEAN TEQ HOLDINGS LIMITED



BEN STOCKDALE
CHIEF FINANCIAL OFFICER

ENCLOSURE 1

FIGURES



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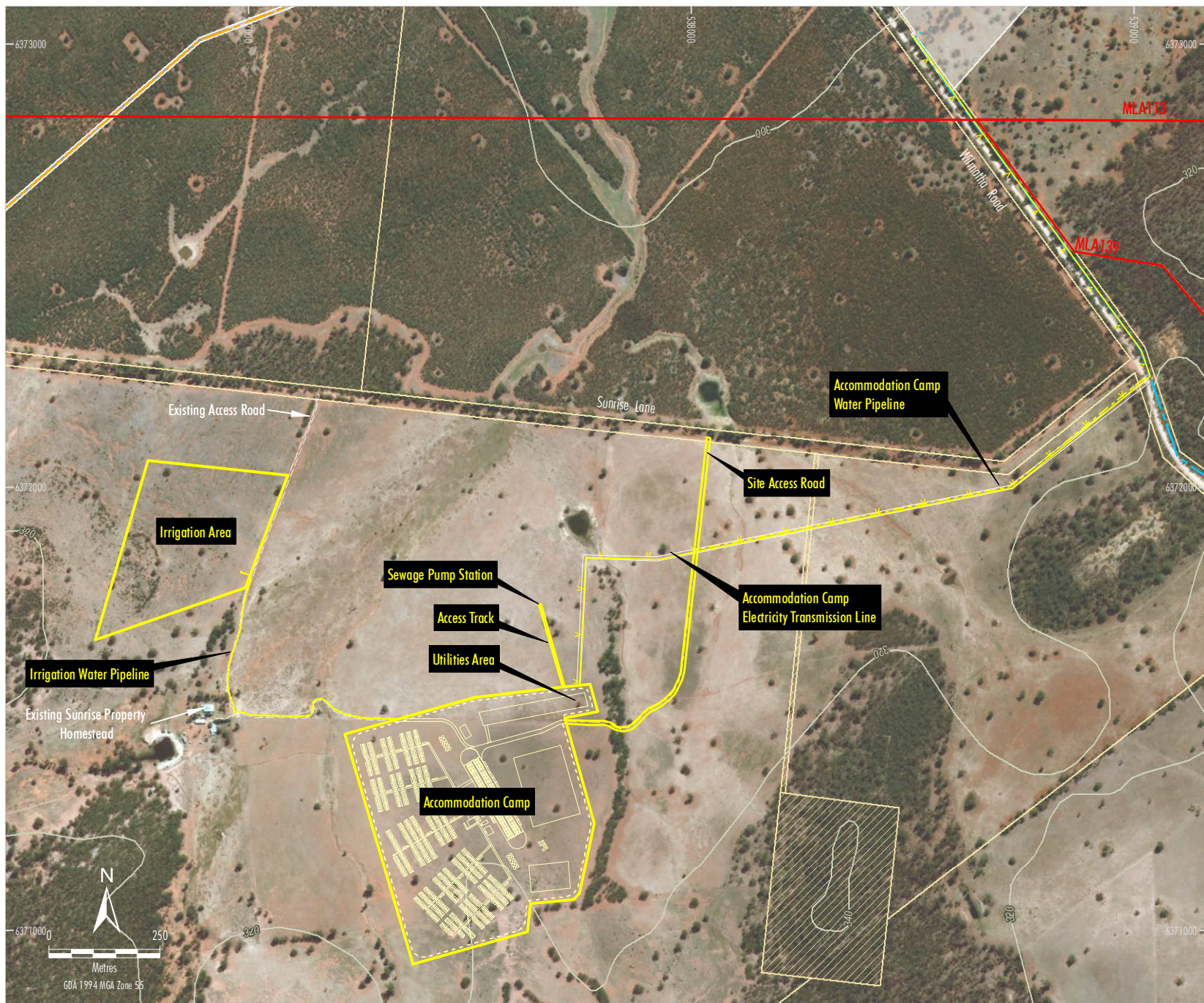
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CLEAN TEQ SUNRISE PROJECT
Conceptual Modified General Arrangement

Figure 1a



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- Mining Lease Application Boundary
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 NSW Imagery: Esri Basemap



CLEAN TEQ SUNRISE PROJECT
 Conceptual Modified General Arrangement
 Inset

Figure 1b