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1st August 2019

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Department Planning Industry & Environment
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Dear Ms Hollis

**Subject: Glendell Mine (DA 80/952) Modification 4 – Response to Submissions Report
Recommendations from Biodiversity and Conservation Division (BCD)**

I refer to your email dated 29 July 2019, and the attached letter from Mr Steven Cox at BCD dated 29 July 2019 regarding the proposed Modification 4 to the Glendell mine consent (DA 80/952). BCD made 7 recommendations regarding the Glendell Modification 4 Response to Submissions document and proposed draft conditions.

Please find below the recommendations from BCD, shown in italics and numbered 1 to 7, along with our responses.

1. *BCD recommends the location and extent of the six previously identified archeologically sensitive areas located in the Bowmans Creek and Swamp Creek landscape is clarified and it should be identified whether these areas will be impacted by the proposed Glendell Mod 4*

- Mount Owen will update the Mount Owen Complex ACHMP to make sure these six sites are shown on the site plans. The areas referred to are all on the other side of Swamp Creek from the proposed Modification 4, and outside of the Glendell Modification 4 study area (see Figure 1 below showing the sensitive archaeology areas). These areas will not be impacted by the proposed Modification 4.

2. *BCD recommends that the Aboriginal cultural heritage assessment report details the results of survey of the Glendell Mod 4 area in April/May 2018 with record of the dates of the survey and evidence of the consultation with and participation by the RAPs.*

- An initial Due Diligence assessment survey for Glendell Modification 4 was completed in 2017 without RAPs. Whilst the timing and need for Modification 4 was being evaluated, work commenced on the broader Glendell Continued Operations Project (GCOP). As noted in the Modification 4 ACHAR, the entire area of the proposed Modification 4 was subject to detailed field survey in April/May 2018 for the GCOP. The 2018 survey covering the Modification 4 area was undertaken with RAPs. The Modification 4 ACHAR (2018) used the 2017 and 2018 field surveys as the basis of the ACHAR and carried out specific community consultation to understand the cultural values of the Modification 4 study area.
- Consultation is set out in Section 3 of the ACHAR. Consultation for both the Modification 4 and the GCOP use the same RAP list, as both areas are covered by the scope of the approved Mount Owen Complex ACHMP. This ensures consistency of RAP representation across adjacent projects and the sharing of knowledge across projects. RAPs are familiar with the landforms of the Modification 4 study area and during Stages 2 and 3 of the consultation requirements, no RAPs requested to undertake additional visits the Modification 4 study area.

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3. BCD recommends that any Aboriginal cultural heritage sites that have not yet been registered on the AHIMS database be submitted for registration immediately

- All sites found during the Glendell MOD 4 survey have been registered with AHIMS.

4. BCD recommends that the Mount Owen Complex Aboriginal Cultural Heritage Management Plan (May 2018) is updated to include all identified Aboriginal sites and archaeologically sensitive areas.

- Noted. The Mount Owen Complex ACHMP will be revised post approval of Glendell MOD 4

5. BCD recommends that the ACHMP should be updated to show the location of the massacre site as being outside of the Glendell MOD 4 boundary and therefore will not be impacted by the proposed Glendell MOD 4.

- Glendell confirms the AHIMS 37-3-0390 point location is outside the Glendell MOD 4 Project Area boundary. The Mount Owen Complex ACHMP will be updated to include this location, post approval of Glendell MOD 4.
- Earlier Aboriginal Cultural Heritage studies undertaken for nearby mining projects such as Mount Owen Continued Operations in 2013 (MOCO EIA, Umwelt 2013) (Appendix 13a) were considered in the preparation of the ACHA for Modification 4, however no earlier assessments identified a confirmed alternate location for the event.
- Whilst Glencore has commissioned additional historical and cultural investigations for the GCOP to attempt to refine the possible location of such an event, there is no revised alternate location, and no indication that the event occurred in the Modification 4 area of additional disturbance.

6. BCD is satisfied with the proposed retirement of the ecosystem credits for this project

- Noted.

7. BCD recommend that the 'Offset Strategy Plan' in Appendix 5 of any updated version of the Glendell Mine consolidated consent includes the Southern Remnant and Southern Remnant Offset.

- An updated Offset Strategy Plan will be provided to DPIE with the response to the Glendell MOD 4 draft conditions, for inclusion in the final consolidated consent.

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Figure 1 – Sensitive Archaeology Areas

I trust these responses address the matters raised by BCD. Should you require any further clarification please do not hesitate to contact me.

Yours sincerely,

Ned Stephenson
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Mt Owen/Glendell Operations