



Your reference: 10_0191
Our reference: DOC15/351016
Contact: David Geering 6883 5335
Date: 7 September 2015

Paul Freeman
Senior Planner, Resource Assessments
NSW Department of Planning & Environment
GPO Box 39
Sydney NSW 2001

Dear Paul

**RE: Hera Gold Project (10_0191)
Increased Production Modification**

Thank you for your invitation for the Office of Environment and Heritage (OEH) to comment on the proposed modification to the Hera Gold Project (10_0191).

OEH understands that this modification includes:

- an increased annual production of the mine
- an increased amount of ore to be produced
- an increase in the life of the mine
- an additional waste rock emplacement
- an extension of the approved Run-of-Mine (ROM) Pad
- an additional hardstand area for the laydown yard
- a minor extension to the existing car park.

Construction of the northern waste rock emplacement, extended ROM pad and hardstand area will impact 6.6 hectares of native vegetation.

OEH has reviewed the Environmental Assessment including the BioBanking plot data and credit reports and has no objections to the proposed modifications.

OEH notes that Aurelia Metals Limited has a proposed, but as yet unsecured, offset on the property "Chelsea" for existing impacts of the Hera Gold Project. This offset will protect 537.74 ha of native vegetation within the 1884.7 ha property. It is OEH's understanding that Aurelia Metals' preferred option for secure these outstanding offset requirements is by a Property Vegetation Plan (PVP). OEH has consistently advocated for the use of a BioBanking Agreement to secure the offset on "Chelsea". This security mechanism remains OEH's preferred option.

OEH further notes that Aurelia Metals Ltd preferred method of securing the additional offsets associated with this modification is also by PVP. The NSW Government Biodiversity Offsets Policy for Major Projects (<http://www.environment.nsw.gov.au/biodivoffsets/biooffsetspol.htm>) and associated Framework for Biodiversity Assessment applies to the proposed Hera Mine modification currently under assessment. The Major Projects Offset Policy sets out offset security options for transitional projects, i.e. projects approved prior to the commencement of the policy on 1 October 2014 or projects that were in a late stage of their planning approval process at that time. Projects which are not transitional

projects are required under the NSW Government Policy to use BioBanking Agreements to secure their offset sites. The OEH view is that the proposed Hera modification should not be considered as a transitional project and accordingly OEH believes that a BioBanking Agreement should be required to secure the offset associated with this modification.

Should the Department of Planning & Environment determine that a PVP is a satisfactory security mechanism for the existing, unsecured, Hera offsets consideration should be given to the potential implications for securing additional offsets for this modification on "Chelsea" by BioBanking Agreement noting that it is the preference of Aurelia Metals Ltd to place a PVP over the entire "Chelsea" property.

Should you require further information regarding issues that are the responsibility of the OEH please contact David Geering, Conservation Planning Officer on (02) 6883 5335 or david.geering@environment.nsw.gov.au.

Yours sincerely,



SONYA ARDILL
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