

## Gen Seed

---

**From:** Tamara Prentice <tamara.prentice@dpi.nsw.gov.au>  
**Sent:** Tuesday, 17 September 2019 6:51 AM  
**To:** Gen Seed  
**Cc:** Andrew Scott  
**Subject:** RE: Mangoola continued operations project

Hi Gen

As indicated last week NSW DPI have concerns with the Mangoola continued operations project as set out below:

Biophysical Strategic Agricultural Land is the most productive land in NSW and is an extremely limited resource. DPI Agriculture does not support the use of this resource for biodiversity offset purposes. The project should be amended such that the proposed biodiversity offset areas avoid BSAL.

Additionally the Mangoola Agricultural Impact Statement has been assessed and is not considered acceptable. Many of the requirements of the AIS are spread through the 25 Appendixes and the main document or are not addressed. Other specific issues include:

There is no demonstration that the project attempts to avoid or remediate Agricultural Impacts. Mitigation measures in the projects documentation refer to Environmental Management Systems, which focus on soil, water, noise, air and biodiversity and not agriculture.

Stocking rates (DSE/ha) or yields of fodder or grain crops (tonnes/ha) have not been supplied to inform gross margins used to determine the loss of agricultural production to the locality. The lack of data to give justifiable estimates of agricultural production weakens the rigour of the cost benefit analysis for the proposal.

There is no investigation into the cumulative effects of mining in general, and this project specifically, on the loss of agriculture in the locality and region as required by the Strategic Regional Land Use Policy — Guideline for Agricultural Impact Statements, October 2012.

The impact on Agricultural Employment in the region is not assessed beyond a statement that impacts are 'not anticipated'.

Please feel free to give me a call should you wish to discuss,

Tamara

**Tamara Prentice | Manager Agricultural Land Use Planning**  
**Department of Primary Industries**  
**PMB 2 GRAFTON 2460 | Trenayr Road JUNCTION HILL 2460**  
**M: 0429 226 987 | E: [tamara.prentice@dpi.nsw.gov.au](mailto:tamara.prentice@dpi.nsw.gov.au)**

