



Our ref: DOC19/833215

Senders ref: SSD-0295-Mod 13

Mr Paul Freeman
Environmental Assessment Officer
Energy & Resource Assessments Group
Paul.Freeman@planning.gov.nsw.au

Dear Paul

Cadia East Mod 13 – Cadia Hill Tailings Completion

Thank you for your e-mail dated 19 September 2019 to the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment inviting comments on the Cadia East Modification 13.

BCD has reviewed the project modification report, Biodiversity Development Assessment Report (BDAR) and the Aboriginal Cultural Heritage (ACH) assessment provided for the proposed modification. BCD is satisfied with the Aboriginal cultural heritage assessment provided and no further assessment is required. Detailed biodiversity comments and recommendations are provided in **Attachment A**.

BCD notes that the proposed modification has generated a credit requirement of 8 ecosystem credits and 46 species credit species. The proponent intends to acquit this liability by making a payment to the NSW Biodiversity Conservation Trust.

If you have any questions about this advice, please do not hesitate to contact David Geering, Senior Conservation Planning officer, via david.geering@environment.nsw.gov.au or 02 6883 5335.

Yours sincerely

30 September 2019

Steven Cox
A/Director North West Branch
Biodiversity and Conservation Division

Cadia East Modification 13

BCD's – Detailed comments and recommendations

Biodiversity

The Biodiversity Development Assessment Report (BDAR) for the modification only considers the impact of construction of the proposed buttressing of the tailings storage facility on native vegetation and threatened biodiversity; however, BCD note that the project modification also includes the decommissioning and closure of an adit in the Cadia Hill open pit.

The modification report states that a habitat assessment inspection was conducted in October 2018 in adit VR101. The entire length of VR101 was driven in a vehicle, stopping at seven side passages. While the deployed anabat recording identified no call sequences, some bat scats were identified in one of the seven side passages. This was a separate assessment to the BDAR. Section 3.3.4 of the modification report considers potential impacts on bat habitat relating to the proposed closure and decommissioning of a ventilation adit located in the Cadia Hill open pit.

BCD notes that the proponent has committed to conducting additional seasonal surveys prior to closing the adit to determine the extent of bat habitat and use on-site. If threatened bats are identified, fauna management strategies would be developed in accordance with the Threatened Species Management Protocol contained within the Cadia Land and Biodiversity Management Plan (BMP). These management measures would be undertaken in consultation with BCD.

Section 9.2 of the Biodiversity Assessment Method (BAM) requires prescribed impacts to be addressed in the BDAR. The modification needs to be considered as a whole, with the prescribed impacts of the adit being addressed in the BDAR.

If threatened bat species are located an additional offset may be required under the *Biodiversity Conservation Act 2016*. BCD recommends that the required surveys for threatened bats be completed and the impacts addressed in the response to submissions.

Recommendation 1

BCD recommends that the proponent either conduct the required surveys to identify species presence in adit VR101, or an expert report is obtained, or species are presumed present in accordance with section 6.4.1.21 of the BAM.

Recommendation 2

BCD recommends that the BDAR is updated to demonstrate that prescribes impacts associated with the decommissioning of adit VR101 have been adequately addressed in accordance with the BAM.