



OUT17/49984

Ms Rose-Anne Hawkeswood
Senior Planning Officer - Resource Assessments
Planning Services Division
Department of Planning & Environment
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Sydney NSW 2001

By email: Rose-Anne.Hawkeswood@planning.nsw.gov.au

Environmental Assessment, Modification to the Sunrise Mine – DA 374-11-00 Mod 4

Dear Rose-Anne

The Resources Regulator has considered the Environmental Assessment, SYR – Syerston Project and Operation, dated 10 November 2017. The Syerston Project, which was renamed the Clean TeQ Sunrise Project (the Project), is an approved nickel cobalt scandium mining project.

Clean TeQ Holdings Limited is seeking to modify the the Project to implement opportunities that will improve the overall efficiency of the Full Production Phase.

The Resources Regulator has reviewed the Environmental Assessment and has no specific comment. However, specific the the Resource Regulator's role of regulating the use of hazardous chemicals under the *Work Health and Safety (Mines and Petroleum Sites) Act 2013*, the Emergency Management and Operational Support Unit within the Resources Regulator have provided the following recommendations to update the following conditions of approval (DA 374-11-00):

Condition 50 (Schedule 3) – Dangerous Goods

- Replace 'storage, handling and transport' with 'use, handling, storage and transport' to be consistent with the *Work Health & Safety Regulation 2017* wording, and capture the usage element.
- Include (d) Managing risk of hazardous chemicals in the workplace code of practice (SafeWork NSW).

Condition 53 (Schedule 3) – Pre-Commissioning Hazard Studies

- (b) include at the end of the first sentence: "Including the matters in appendix 6 – Major Hazard Facilities". Also include a requirement that the emergency plan needs to also consistent with the Code of Practice for Emergency Planning at Mines (NSW Resources Regulator), and WHS (Mines and Petroleum Sites) Act and Regulations emergency planning requirements.



- (c) include a comment that the safety management system must include hazardous chemicals as a Principal Mining Hazard.

In addition, consider including a requirement under Condition 53 for a Layer of Protection Analysis to be conducted regarding off site impacts within the HAZOP requirements (regarding hazardous chemicals).

Should you have any further questions in relation to this matter, please contact Matthew U'Brien, Team Leader Emergency Management & Operational Support, on 4063 6469.

Yours sincerely

Matthew Newton

Acting Director Strategic Compliance Unit

NSW Resources Regulator

22 December 2017