

All communications to be addressed  
to the General Manager  
PO Box 223  
Cobar NSW 2835

Telephone: (02) 6836 5888  
Facsimile: (02) 6836 3964  
Email: [mail@cobar.nsw.gov.au](mailto:mail@cobar.nsw.gov.au)  
Website: [www.cobar.nsw.gov.au](http://www.cobar.nsw.gov.au)  
In your reply please quote:



Cobar Shire Council Offices:  
36 Linsley Street  
Cobar NSW 2835  
ABN 71 579 717 155

*"Regional Centre in Western NSW"*

Director - Resource Assessments  
Planning Group, Department of Planning and Environment  
Locked Bag 5022  
Parramatta NSW 2124

[Jack.Turner@planning.nsw.gov.au](mailto:Jack.Turner@planning.nsw.gov.au)

8<sup>th</sup> April 2022

Dear Sir

**RE: Submission in Response to the EIS on the Proposed Federation Mine Project  
(Application No SSD-24319456)**

Thank you for the opportunity for Cobar Shire Council ('Council') to table this Submission in response to the proposed Federation Mine Project near Nymagee by Hera Resources Pty Limited ('Hera'), a subsidiary of Aurelia Metals Limited ('Aurelia').

The proposed project will be located within the Cobar Local Government Area and has physical and socio-economic consequences for Council to manage.

Council notes the proposal involves the establishment and operation of an underground gold and metalliferous mine at the Federation site, including:

- a) Mining approximately 6.95 million tonnes of ore over a period of 12 to 14 years;
- b) Establishment of supporting surface infrastructure;
- c) Modifications to the existing Hera Mine to facilitate mining and processing ore;
- d) Establishment of a services corridor between the Federation site and Hera Mine;
- and
- e) Consolidation and surrender of the existing approval for the Hera Mine.

Council considers the proposal has merit, however its ultimate support is contingent upon satisfactory resolution of matters mentioned herein to safeguard the environmental, social and economic attributes of the Cobar LGA and Nymagee and surrounding community in particular.

The salient matters that Council seeks the satisfactory resolution of include:

- 1. Upgrading local roads;
- 2. Securing a Planning Agreement;

2. Securing a Planning Agreement;
3. Provision of live, real-time monitoring data;
4. Safeguarding Nymagee's water supply;
5. Increased focus on filling available jobs with locals;
6. Protection of the health and wellbeing of those living in Nymagee; and
7. Enhancing positive social cohesion between the mine and the local community.

The abovementioned items are further address below.

## **1. ROADS AND TRAFFIC**

### ***1.1 Consent Conditions for the Existing Hera Mine***

The key **heavy vehicle transport** terms in relation to the current Hera operating Consent Conditions appear to be:

- a) The transport of up to **100,000 tonnes per year of ore from Hera to the Peak Mine** via Priory Tank Road and Kidman Way for processing (say 2,000 truckloads per annum x 50 tonnes). The Consent appears to be silent on the actual tonnage of waste rock permitted to be transported from Peak to Hera, however, the combined transport of ore to and waste rock from Peak Mine is limited to 44 vehicle movements (entering and leaving the site) per day, that is 22 truckloads. We are advised by the Company that the consent allows for backloading of up to 100,000 tpa of waste rock, however, this activity has not been triggered to date;
- b) The transport of up to **60,000 tpa of concentrate** from the site to the Hermidale rail siding via the Nymagee - Hermidale Road. The haulage must be undertaken with no more than eight vehicle movements (entering and leaving the site) per day, that is four truckloads. (Requires approximately 1,200 truckloads per year x 50 tonnes);  
and
- c) The truck trips are to be in daylight hours, allowable seven days per week.

### ***1.2 Proposed Heavy Vehicle Traffic in Cobar LGA***

In relation to the proposed Federation Project, it is understood the heavy vehicle road and traffic implications are as follows:

- a) Up to **200,000 tpa of ore** to be hauled from Hera to Peak via Priory Tank Road and Kidman Way, over the four-year period of 2024 to 2027, (**totalling 750,000 t**) with

zero tonnes before and after that timeframe. Over that time, this represents a **doubling** of the amount of ore to be hauled compared to the current approval. Predicted to be 11 truckloads per day. Trucks carrying ore to Peak maybe backloaded with waste rock to Hera, however Council understands this has not happened to date.

- b) Council has sought advice from the proponent regarding whether any waste rock will be transferred between Hera and Federation (in either direction) during the operations phase (ie not the construction phase).

The advice received states 'any waste rock movements required during the operational phase of the project will occur within the existing heavy vehicle movements defined in the EIS. No waste rock haulage on top of these movements is proposed'.

Could DPE please obtain further clarification on this matter. Council wishes to know what tonnages of waste rock are proposed to be hauled, in either direction, on Burthong Road, as tonnage has consequences for the weight loading wear and tear on Burthong Road. If waste rock is to be hauled during operations then the details should be declared and specified in any consent. Otherwise not permitted.

- c) Up to **154,500 tpa of concentrate** to be hauled from Hera to the Hermidale rail siding via the Nymagee - Hermidale Road. This represents a **2.5 times increase** in the amount of ore to be hauled on this road compared to the current approval.
- d) It is predicted that up to **38,700 tpa** of Federation concentrate will be hauled from Peak (where it is to be processed) to the Hermidale (or Dubbo) rail siding, via the Barrier Highway. How much will Peak's own production add to this quantum? Council understands the current approval allows for 100,000 tpa of concentrate from Peak. Is this correct?

Additionally, it is understood there will be **other heavy vehicle impacts** on local roads and traffic as follows:

**a) Burthong Road – from the Federation Mine site to Hera:**

- i. **A total of 20,000 t of ore bulk sample** from the mineral exploration works (approved under the Mining Act) in the first 24-30 months;
- ii. **A total of 425,000 t waste rock** as part of the mineral exploration works (approved under the Mining act) in the first 24- 30 months.

Items i. and ii. above are predicted to generate a combined maximum of 40 truck loads per day.

- iii. A mine life total of **6.95 Mil tonnes of ore hauled for processing at either Hera or Peak**. This represents up to **752,000 tpa**, with the maximum planned during 2028-2033. Represents a maximum of **40 truckloads per day**;
- iv. Over the proposed 12-14 year life of the Federation Mine there will be 25 exploration workers continuing to better define the scope and extent of the Federation ore deposit. Some of their trips may be with heavy vehicles.

**b) Burthong Road – from Hera to the Federation Mine site:**

- i. A mine life total of approximately **3.48 Mil tonnes of tailings** generated from the processing of ore at Hera will be hauled back to the Federation site and buried underground. Likely to be at a maximum of **378,000 tpa**, especially during 2025-2033. Say maximum of 21 truckloads per day. This represents 60% of the total tailings volume generated of 5.8 Mt. The balance of Project tailings generated at Hera will be placed underground at Hera.

Thus, in summary, it appears that over the 12–14 year initial life of the Federation Mine it can reasonably be expected that about **11 Mil tonnes of earthen material will be hauled on Burthong Road**. This represents approximately 800,000 tonnes per annum. This number excludes any waste rock haulage during operations (ie construction phase only).

**1.3 Proposed Light Vehicle Traffic in Cobar LGA**

The key **light vehicle transport impacts** compared to the current Hera operations appear to be:

- a) Federation Construction Phase: There will be a maximum of 100 construction workers for about 15 months (2023/2024). With 20 days on and 8 days off. Typically 75 out of the 100 will be working at any one time, with 75% at Hera and 25% at Federation. The workers will reside on-site at the Hera accommodation facility. The facility currently has 140 beds with an additional 100 beds to be built prior to the commencement of Project construction. Council seeks to have this construction requirement locked in to a condition of consent.

The workers will be transported to Federation via 1 shuttle bus and 5 cars.



On shift changeover days there will be 10 cars and 1 bus to Cobar and beyond and 9 cars and 1 bus to Nyngan and beyond.

b) Federation Operations Phase:

There will be retention of the current Hera operations workforce (approximately 150 people) to continue post its own mine life to manage the resources trucked out of the Federation Mine. With the advent of Federation, there will be an additional 65 (max) workers to the current number, totalling a maximum of 214. Operations workers will have 7 days on, 7 days off, with say 110-120 on duty at any one time.

Whilst on shift the employees will reside on-site at the Hera accommodation facility. It is understood the facility currently has 140 beds with an additional 100 beds to be built during Stage 2, which will occur prior to the commencement of Project construction.

Approximately 3 buses and 5 cars will move workers from the accommodation village to the mine site and back to per day, so 6 and 10 trips respectively.

On shift changeover days approximately 53 cars will be in-bound to Hera and 53 out-bound to home (see page 43 of traffic study).

Ordinarily, there may be 15 light vehicles travelling to and from Cobar on any normal operations working day.

c) Deliveries:

The Project will generate approximately 10 truckloads per day of deliveries (non-haulage type), of which 6 are assumed to be associated with the operational activities and accommodation village at Hera Mine, and 4 are assumed to be associated with operational activities at Federation Site (page 44 of traffic study).

d) Federation Exploration Phase - Ongoing:

For the duration of the 12-14 year initial mine life 25 workers will also continue exploration activities to better define the scope and extent of the ore deposit. These workers will also reside at the Hera on-site accommodation facility. The facility currently has 140 beds with an additional 100 beds to be built prior to the commencement of Project construction.

Clearly, some of their trips to Federation will be via heavy vehicles.

**e) DI/DO Workers:**

Approximately 15% of the current 150 employees reside in the local district. About 85% of the Project's employees (or about 200 operations and exploration staff) are likely to be drive in/drive out (2 hours or more driving time away) and hence will be travelling at the start and end of their shifts. This will add additional traffic to the local roads. Buses will be used to carry some workers.

***1.4 Road Upgrade Requirements of Cobar Shire Council***

**a) Burthong Road**

Burthong Road is sealed to 2 kms south of the Hera Mine access road and is then gravel for 8 kms to the Federation access point.

The Traffic Study predicts that at peak production haulage (ore and tailings) vehicle trips along Burthong Road (between Hera Mine and Federation Site) will be an average of 124 truck trips per day.

Council considers Burthong Road is of an inadequate standard to accommodate the predicted very substantial increase in heavy vehicle traffic and the tonnages involved.

Council, as the local roads authority, therefore requires:

- a) The Proponent to pay for an upgrade of Burthong Road from the Hera Mine site to the Federation southern-most access point. The upgrade works must be completed prior to any movement of Project-related construction traffic;
- b) The required road upgrade requirements to Burthong Road are to be:
  - A 10 m wide carriageway, including 8 m wide seal (3.5 m x 2 travel lanes & 2 x 0.5 m shoulders) and 1 m wide unsealed shoulders on each side; and
  - The Federation Mine access points on Burthong Road require BAL and BAR treatments.

**b) Whitbarrow Way**

Whilst Whitbarrow Way is sealed, it requires upgrading to accommodate a possible 2.5 times increase in the quantity of concentrates to be hauled to Hermidale.

Thus, Council requires:

- c) The Proponent to pay for an upgrade of Whitbarrow Way from Nymagee to the Shire boundary. The upgrade works must be completed prior to any movement of Project-related construction traffic;
- d) The required road upgrade requirements to Whitbarrow Way are to be:

- A 10 m wide carriageway, including 8 m wide seal (3.5 m x 2 travel lanes & 2 x 0.5 m shoulders) and 1 m wide unsealed shoulders on each side; and
- The Federation Mine access points on Burthong Road are to have BAL and BAR treatments.

**c) Other roading upgrades**

Council requires the Proponent to pay for an upgrade of the following intersections:

- Priory Tank Road/ Burthong Road intersection; and
- Priory Tank Road/Kidman Way intersection to be provided with BAL treatment.

The upgrade works must be completed prior to any movement of Project-related construction traffic.

To be clear, any consent should include, to Council's satisfaction, a condition that stipulates the Proponent provide to Council an annual allocation of road maintenance funding as nominated by Council to cover, on a road traffic proportional use basis, the repair and maintenance costs of local road, (different rates for different road types) that are used by Project-related traffic.

## **2. SECURING A PLANNING AGREEMENT**

As the sphere of government directly responsible for, and engaged in, the day-to-day governance of Cobar LGA, the issues confronting Council are significant and diverse. Whether it be roads and bridges, water and sewerage systems, waste, community buildings or recreation facilities, the availability and quality of this infrastructure and social services impacts on the standard of living and economic prosperity of our citizens and ratepayers.

Council thus seeks development contributions from the Proponent via a Planning Agreement that acknowledges the broad, tangible and intangible environmental, social and economic costs arising from the Development. Such funds will be applied to a public purpose that will ensure the provision of a public benefits.

It is Council's desire to negotiate a Planning Agreement before any project approval is granted, with the Agreement's key terms to be included as a specific condition within the project determination.

## **3. PROVISION OF LIVE, REAL-TIME MONITORING DATA**

Council recommends any consent require a condition that the environmental monitoring program results for noise, air quality (including particulates, lead, etc) vibration, blasting, surface water and groundwater, etc, be available live and in real time on a website. Such technology now exists and it is time such openness and transparency was provided to local communities by mining developments.

Such an open and transparent availability of data should be key component of the community and stakeholder engagement strategy mentioned below.

#### **4. SAFEGUARDING NYMAGEE'S WATER SUPPLY**

The EIS stakeholder engagement study revealed some concerns regarding the security of a water supply town for Nymagee.

Council wishes to see open and transparent live monitoring data made available for the duration of the Federation Project.

#### **5. INCREASED FOCUS ON FILLING AVAILABLE JOBS WITH LOCALS**

Council supports the enhanced workforce stability likely to be generated by the Federation Project, as well as benefit to the local community through the flow-on effect of support for local businesses and services and improved community well-being.

To enhance the livelihood benefits arising from ongoing employment and mining operations it is recommended that any consent require Hera and related workforce contractors to focus on employing locals, including First Nations peoples.

To help achieve this goal, it is recommended that:

- a dedicated Aboriginal employment policy and supporting strategy be developed and implemented; and
- substantial and meaningful staff development and training and apprenticeship opportunities be provided;

Engagement of more locals will also reduce the DI/DO traffic volumes.

#### **6. PROTECTION OF THE HEALTH AND WELLBEING OF THOSE LIVING IN NYMAGEE**



Protection of the health and wellbeing of those living in Nymagee, including six potentially sensitive residential receivers, is recommended. Safeguarding of wellbeing of locals means prevention of excessive dust, especially from increased road traffic and the tailings storage facility.

## **7. ENHANCING POSITIVE SOCIAL COHESION BETWEEN THE MINE AND THE LOCAL COMMUNITY.**

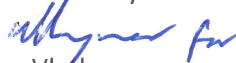
As per the EIS, Council recommends that any consent require the Proponent develop and implement a Communications and Engagement Plan (CEP). The CEP would be aimed at strengthening social cohesion, social capital and resilience in the local area by increasing Project transparency and facilitating investment into the local community.

It is recommended the proposed Communications and Engagement Plan:

- i. be founded on respect for the personal and property rights of the local community, including the perceived or actual risks of adverse environmental, social or economic impacts arising from the Project;
- ii. implement the live, real-time availability of environmental monitoring data on a website;
- iii. develop and implement a definitive plan to hire locally as much as possible and to procure goods and services locally;
- iv. create training programs, apprenticeships and upskilling programs, in consultation with the Cobar mining school run by TAFE, based on Project workforce and supplier needs; and
- v. promote consistent and on-going engagement with the local community and reporting of feedback for consideration in the review of impact monitoring and management measures.

If you have any queries regarding the abovementioned matters, please don't hesitate to contact the Council's Director of Planning & Environmental Services, Mr Garry Ryman on (02) 6836 5888.

Yours faithfully



Peter Vlatko

**General Manager**