

8 April 2022

Director - Resource Assessments
Planning Group, Department of Planning and Environment
Locked Bag 5022
PARRAMATTA NSW 2124
Jack.Turner@planning.nsw.gov.au

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 Bogan 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 impact on the Bogan Local Government Area and has physical and socio-economic consequences for the 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 Bogan LGA and Hermidale 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;
3. Increased focus on filling available jobs with locals;
4. Protection of the health and wellbeing of those living in Hermidale; and
5. Enhancing positive social cohesion between the mine Proponent and the local community.

The abovementioned items are further address below.

1.1 ROADS AND TRAFFIC

Throughout this submission, a vehicle trip is defined as a one-way movement of a vehicle. A vehicle arriving and then departing a location therefore generates two vehicle trips.

1.1 Consent Conditions for the Existing Hera Mine -Concentrate Haulage

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

- a) The transport of up to **60,000 tpa of zinc/lead concentrate** from Hera to the Hermidale rail siding via 73 kms of 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**, averaged over a calendar month; (Requires approximately 1,200 truckloads per year x 50 tonnes);
- b) The truck trips are to be in daylight hours, allowable seven days per week;
- c) The transportation of the 60,000 tpa of concentrates is permitted via Nymagee - Hermidale Road (the Principal Concentrates Transport Route), which includes:
 - Burthong Road;
 - Hartwood Street;
 - Milford Street;
 - Whitbarrow Way;
 - Hermidale Nymagee Road;
 - Nyngan Street;
 - Youngee Street; and
 - The Barrier Highway;

- d) The approved Secondary Concentrates Transportation Route from Hera Mine to the

Hermidale Rail Siding is permitted to be used for transportation of ore only when required, including during times of road closures following heavy rain or when more than eight truck movements per day averaged over a calendar month is required for transport of concentrates. The transportation of 100,000 tpa of concentrates from Hera Mine to Hermidale Rail Siding is permitted via that part of the Secondary Concentrates Transport Route between Hera Mine and Peak Mine. The Secondary Concentrate Transport Route includes:

- Burthong Road;
- Priory Tank Road;
- Kidman Way; and
- Barrier Highway.

Also, after processing at Peak Mine, concentrates are hauled to the Hermidale or Dubbo rail sidings, consistent with the current Peak Mine operations.

Transport of the concentrates are 50 tonne loads, currently uses sealed containers, transported on Type 1 A - double road trains and modular B-triple road trains. The bulk concentrates are loaded on to trains at Hermidale (or Dubbo) rail siding and transported to Newcastle for export.

To Note: the average daily trips calculations assume a 50t payload per truck, operating 365 days per year. Outbound laden movement and inbound unladen movement generates 2 vehicle trips.

1.2 Proposed Heavy Vehicle Traffic in Bogan LGA

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

- a. **Up to 154,500 tpa of concentrate** is to be hauled the 73 kms from Hera to the Hermidale rail siding via the Nymagee - Hermidale Road, with the peak expected to occur in FY2029. This represents a **2.5 times** increase in the amount of ore to be hauled on this road compared to the current approval of 60,000 tpa.

Assuming a 50 tonne payload, this represents approximately 3,000 truckloads in 2032 when 154,500 t is predicted to be transported, up from the current

1,200 truckloads per year. From a daily perspective this increased volume represents an average of **8-9 truckloads** (see Table C2).

The range of the maximum number of concentrate-hauling trucks per day (Table 5.10) includes:

2025	6 loads	2031	14 loads
2027	10 loads	2032	16 loads
2028	16 loads	2033	11 loads
2029	17 loads	2034	5 loads

- b. Aside from concentrate haulage, there will be other Project-related heavy traffic on this road including:
 - Construction Phase: 3 truckloads/day; and
 - Operations Phase: 2 truckloads/day
- c. It is predicted that up to **38,700 tpa** (maximum in FY 2026) 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. Current approval allows for 100,000 tpa of concentrate from Peak.

a. Proposed Light Vehicle Traffic in Bogan LGA on Nymagee Hermidale Road

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
On shift change days it is expected there will be up to 9 cars and a bus travelling on the Nymagee Hermidale Road.
- 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 extracted from 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.

On shift change days it is expected there will be up to 48 cars and a bus travelling on the Nymagee Hermidale Road. On non-shift change days up to 4 cars/day are predicted.

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

d) 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 Bogan Shire Council

a) Nymagee – Hermidale Road

Council is of the view that Nymagee – Hermidale Road requires upgrading to accommodate a predicted 2.5 times increase in the quantity of concentrates to be hauled to Hermidale.

Thus, Council requires:

- a) The Proponent to pay for an upgrade of Nymagee – Hermidale Road from the Shire boundary near Nymagee to the Hermidale rail siding. The upgrade works must be completed prior to any movement of Project-related construction traffic;
- b) The required road upgrade requirements to Nymagee – Hermidale Road are to be 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

- c) The intersection of Nymagee Street and Nyngan Street in Hermidale be upgraded, with better protection for local children in the area

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.

D. SECURING A PLANNING AGREEMENT

As the sphere of government directly responsible for, and engaged in, the day-to-day governance of Bogan 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.

E. 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.

F. PROTECTION OF THE HEALTH AND WELLBEING OF THOSE LIVING IN HERMIDALE

Protection of the health and wellbeing of those living in Hermidale, especially prevention of excessive dust generation, especially from increased road traffic.

G. 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 Hermidale 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. develop and implement a definitive plan to hire locally as much as possible and to procure goods and services locally;
- iii. 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
- iv. 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 Engineering Services Director, Graeme Bourke (02)35 9000 or email graeme.bourke@bogan.nsw.gov.au

Yours sincerely

A handwritten signature in blue ink, appearing to read 'D. Francis', written in a cursive style.

Derek Francis
General Manager