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SSD 10_0191

Ms Mandana Mazaheri
Senior Environmental Assessment Officer
Resource & Energy Assessments
Department of Planning and Environment
Mandana.Mazaheri@planning.nsw.gov.au

Dear Mandana

Hera Mine MOD 5 – SSD 10_0191

I refer to your email dated 18 March 2019 seeking comments from the Office of Environment and Heritage (OEH) on the Environmental Impact Statement (EIS) for the proposed Hera Gold Mine Mod 5.

OEH understands that the proposal seeks to modify the following components and operations at the mine:

- Increase the rate of transportation of concentrate from Hera Mine to the Hermidale rail siding
- Install a water management dam to act as a decant pond for the existing tailings storage facility
- Receive water from dewatering of the Nymagee Copper Mine for use in processing operations at the Hera Mine or evaporation within the proposed water management dam.

OEH notes that extraction of water from the Nymagee Copper Mine and transfer of water to the Hera Mine site is not part of this modification and have been advised that reference to the installation of a pipeline to receive water from the Nymagee Copper Mine in the BDAR for this modification are in error.

OEH notes that the project has generated an offset requirement of 300 ecosystem credits for the loss of 11.4 ha of Poplar Box – Gum Coolabah – White Cypress Pine shrubby woodland in the Cobar Penepine Bioregion (PCT 103). This will be acquitted by retiring credits on the proposed Biodiversity Stewardship Site on 'Chelsea'.

Attachment A provides detailed comments on biodiversity for your consideration.

OEH note that in the Aboriginal cultural heritage assessment findings that no Aboriginal objects were discovered in the proposed Mod 5 footprint during two survey assessments undertaken by Appleton (2004) and OzArk (2011).

Should you require further information regarding issues that are the responsibility of the OEH please contact David Geering on 02 6883 5335 or david.geering@environment.nsw.gov.au.

Yours sincerely

A handwritten signature in black ink, appearing to read 'P. Christie', is positioned above the printed name and title.

PETER CHRISTIE
Director, North West
Conservation and Regional Delivery

1 April 2019

Contact officer: DAVID GEERING
6883 5335

Cc: Phillipa Duncan Phillipa.duncan@planning.nsw.gov.au

Attachment A

OEH review of Hera Gold Mine Mod 5 EIS

1. Placement of vegetation plots not in accordance with the BAM

OEH recognises the efforts of the proponent to locate the development footprint to minimise impact to remnant native vegetation. It is noted that moving the footprint has resulted in one of the three required vegetation plots being outside the footprint assessed by the BDAR. The BAM requires vegetation survey data to be collected on the subject land. OEH is however satisfied that the plot outside the footprint is representative and is likely to have no impact on the calculated offset requirement.

Recommendation:

- 1.1 No action. Advice only

2. Recommended mitigation measures for fauna should be adaptive

Table 8-1 of the BDAR outlines the proposed mitigation measures for the project. OEH is generally supportive of these measures but suggests that mitigation measures be adaptive to account for changes. For example, Table 8-1 indicates that two Grey-crowned Babbler dreys may need to be relocated. The location of these dreys is provided. It is possible that dreys may be abandoned, and new dreys constructed making the information provided redundant.

Recommendation:

- 2.1 The mitigation measures be adaptive and includes surveys to ensure that the mitigation measures proposed are still current and relevant.

3. Credit requirement for the development needs to be clarified

Section 9 of the BDAR outlines the offsetting requirement of the project. Table 9-1 indicates that 300 ecosystem credits are required for impact to 11.4 ha of PCT 103. This is confirmed by the BAM Credit Calculator report provided in Appendix B of the BDAR. Table 9-3, which provides a summary of BioBanking (from previous Hera development projects) and BAM (Mod 5) credits, suggests that the number of ecosystem credits required for Mod 5 is 239 for 9.10ha of impact.

Recommendation:

- 3.1 Table 9-3 be amended to reflect the credit requirement generated by the BAM Credit Calculator.

4. Offsetting commitments have yet to be finalised

Table 9-3 provides the offsetting options for MOD 5 as well as previous Hera Mine developments. OEH notes that these previous offsetting commitments have yet to be realised as the proposed Chelsea BioBanking Site has yet to be finalised. The BDAR indicates that the proponent is in the process of commissioning a Biodiversity Stewardship Site Assessment Report (BSSAR) to establish a Biodiversity Stewardship Site on 'Chelsea'.

The credits in Table 9-3 are a mix of BioBanking and BAM credits. The BDAR correctly states that the BioBanking credits will need to be converted to BAM credits and that there can be no certainty that there are enough credits to retire the MOD 5 credit requirement until this occurs. The BDAR provides the commitment that any residual offsetting requirement will be achieved using other approved mechanisms under the BC Act.