

OUT13/17794

Ms Elle Donnelley Planner Department of Planning and Infrastructure GPO Box 39 SYDNEY NSW 2001 27 AUG 2013

Email: elle.donnelley@planning.nsw.gov.au

Dear Ms Donnelley

Thank you for your email of 8 July 2013 concerning the review of the Agricultural Impact Statement for the proposed Northparkes Mines Step Change Project.

The Office of Agricultural Sustainability & Food Security (O AS&FS) has reviewed the AIS provided by Umwelt on 9 July 2013. A summary of assessment is included in Attachment 1 enclosed. An outstanding issue surrounds base line data associated with soils as outlined in the attachment.

This advice from the Office of Agricultural Sustainability & Food Security is forwarded direct to the Department of Planning & Infrastructure in accordance with agreed arrangements for mining applications that affect agricultural land.

Additional advice from the other divisions within the Department of Primary Industries may be forwarded by separate letter.

If you wish to discuss the issue further please call Liz Rogers on telephone 02 63913642 or by email liz.rogers@dpi.nsw.gov.au.

Yours sincerely

Dr Regina Fogarty

Rym Logard

Director Office of Agricultural Sustainability & Food Security

**Encl** 

Specific Agricultural Impact Assessment Issues – Northparkes Mines Step Change Project

### 1. Key Environmental Issues that include baseline data, impact analysis, mitigation plans and management and monitoring summaries

The OAS&FS notes that the project area comprises mainly high quality agricultural land capability classes II and III. Considerable reference has been made to Cunningham (2006) Soils Survey and Land Capability Assessment of the Northparkes Mines – E48 Project yet this document has not been included. Without this information, soils and land capability cannot be properly assessed. The OAS&FS requests the inclusion of this document or the inclusion of the relevant data referred to in this document.

The assessment of Biophysical Strategic Agricultural Land (BSAL) (in Sections 1.3 and 4. of Appendix 5) does not address the BSAL criteria sufficiently. The broad statement (in Section 4.2.3) that 'soil fertility is not high enough to meet this criteria' is not sufficient. The fertility criteria contained in the Interim Protocol for Verification of Biophysical Strategic Agricultural Land should be used and the soils of the area should be included or excluded from BSAL through this process.

The extent of salinity is not clear. In Section 3.2.2 the proponent states that most of the SMU2 profiles tested had moderate to extreme salinity in their deep subsoil yet soil test results referred to in Section 3.2.3 (pertaining to soils broadly consistent with SMU2 soils) states that 'Salinity...and chloride... were relatively low in all tests'. Clarification on the extent of salinity in the project area is required.

The DGRs specifically requested the consideration of contamination with the land and soil capability in the AIS and this has not been done. Contamination should be considered in the AIS.

### 2. Socio-economic Assessment: Northparkes Step Change Project

The following provides a review of the socio-economic component of the Agricultural Impact Statement (AIS) provided as part of the Northparkes Step Change Project Environmental Assessment (EA). The AIS and supporting documentation were reviewed with reference to the following material: Strategic Regional Land Use Policy Delivery Guideline – Guideline for AISs (March 2012), AIS Fact Sheet (September 2012), and the Strategic Regional Land Use Policy Guideline for AISs (Re-issued October 2012).

# 2.1. Impacts on agricultural enterprises, including farm productivity, land values and flow on impacts to regional communities and the environment.

#### a) Farm productivity

The proponent indicates that the proposed development would result in a small loss of agricultural production from its own land (117ha of arable land providing a gross income of \$51,855 p.a.). The proponent has presented sufficient detail.

#### b) Land values

The proponent indicates that the proposed development would have minimal impact on agricultural land values. We have no evidence to believe otherwise.

c) Flow on impacts to regional communities

The AIS presents limited information on flow on impacts to the regional agricultural community. Relevant information is presented in EA Appendix 15 – Social Impact Assessment, where the proponent indicates that the proposed development would have minimal adverse impacts. We consider that this claim is reasonable given that the development would only result in a small loss of arable land.

### 2.2. Any water that is transferred or will no longer be available for agricultural use.

Community consultation documented in EA Appendix 15 – Social Impact Assessment indicates that water use by the mine is an issue for the agricultural community. In the AIS, the proponent asserts that the proposed development would require no additional water use and therefore have minimal additional impact on agriculture. We consider that this claim is reasonable.

### 2.3. Impacts on agricultural support services, processing and value adding industries and regional employment.

a) Agricultural support services

The proponent indicates that minimal adverse impact is expected. We consider that this claim is reasonable given that the development would only result in a small loss of arable land.

b) Processing and value adding industries

The proponent indicates that minimal adverse impact is expected. We consider that this claim is reasonable given that the development would only result in a small loss of arable land.

c) Regional employment

The AIS does not address regional employment impacts. Relevant information is presented in EA Appendix 15 – Social Impact Assessment, where the proponent indicates that no significant changes to agricultural employment are expected. However, community consultation indicates that local skill shortages and training needs are issues for the community. A range of mitigation measures are presented and it is recommended that they are adopted by the proponent.

# 2.4. Impact on visual amenity, landscape values and tourism infrastructure relied upon by local and regional agricultural enterprises.

The proposed development would increase the height and area of tailing storage facilities on the mine site and require increased fixed and mobile lighting, which could increase existing impacts on visual amenity and landscape values.

a) Visual amenity

The AIS does not address visual amenity impacts. Relevant information is presented in EA Section 5.12 on visual amenity impacts on neighbouring private residences. Although minimal additional adverse impacts are expected, a range of mitigation measures are presented. It is recommended that these measures are adopted by the proponent.

b) Landscape values

The AIS does not address impacts on landscape values. Our assessment is that any additional impacts would be minimal.

c) Tourism infrastructure

The AIS does not address impacts on agricultural tourism enterprises. Our assessment is that any additional impacts would be minimal.

- 2.5. Mitigation measures for minimising adverse impacts on agricultural resources, including agricultural lands, enterprises and infrastructure at the local and regional level.
- a) Agricultural lands

The proponent indicates that minimal adverse impacts are expected and has committed to a high standard of agricultural practice (e.g. conservation farming) on the arable land that it owns.

b) Agricultural enterprises

The proponent indicates that minimal adverse impacts are expected. We consider that this claim is reasonable given that the development would only result in a small loss of arable land.

c) Agricultural infrastructure

The proponent indicates that minimal adverse impacts are expected. We consider that this claim is reasonable given that the development would only result in a small loss of arable land.

2.6. Documented consultation with adjoining land-users and Government Departments.

The AIS does not address community consultation. Community consultation is however documented in EA Appendix 15 – Social Impact Assessment. Sufficient information is provided.