

Our Ref: 20272_R04_Northparkes Mod 6_Consolidated_Scoping Letter_20211021

21 October 2021

Steve O'Donoghue
Director, Resource Assessments
Department of Planning, Industry and Environment

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Dear Steve

**RE: Northparkes Extension Project
E22 Portal, TSF2 Buttressing and E31 Precinct Modification**

CMOC Mining Pty Ltd (Northparkes) was granted Project Approval (PA) 11_0060 under Part 3A of the *Environmental Planning and Assessment Act 1979* (EP&A Act) on 16 July 2014 for the Northparkes Mine Step Change Project (Northparkes Extension Project). PA 11_0060 has been modified on 5 occasions since grant with the most recent modification (Mod 5) occurring in 2019. Approved operations at the Northparkes Mine include open cut and underground copper-gold mining, associated ore handling and processing and product transport through to December 2032.

Northparkes recently submitted a Scoping Report for the Northparkes E44 Rocklands Project. This State significant development (SSD) application will cover all operations at Northparkes and will supersede PA 11_0060. However, in the interim, a number of reasonably minor changes to approved operations under PA 11_0060 are required.

In September 2021, Northparkes submitted two separate Scoping Letters for Modifications 6 and 7 to PA 11_0060. These proposed modifications involve amendments to approved activities and associated disturbance areas in the vicinity of the E31 Precinct (Mod 6) as well as the establishment of a new E22 portal access and an extension to the Tailings Storage Facility (TSF) 2 disturbance area to facilitate embankment buttressing (Mod 7). The Department issued informal environmental assessment requirements for the two modifications on 16 and 28 September 2021, respectively.

Northparkes had initially sought to separate the modification applications on the basis that approval for the E31 Precinct works was required in January 2022 and the additional biodiversity and cultural heritage assessment requirements associated with the assessment of the E22 portal and TSF2 buttressing works were incompatible with this timeframe. However, following recent changes to project scheduling, the approval timeframes for the proposed modifications are now better aligned. Consequently, Northparkes wishes to combine the two proposals into a single modification application. This change will better facilitate a comprehensive assessment of cumulative impacts and reduce administrative duplication.

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Subject to confirmation from the Department, it is anticipated that the combined modification application will proceed as Mod 6 and Mod 7 will be withdrawn from the Major Projects website.

This letter includes a general description of the activities proposed to be included in the combined Mod 6 application, the proposed technical assessments to be prepared as part of the supporting Modification Report and the anticipated timeframe for the lodgement and determination of the application. We would appreciate confirmation from DPIE of any further assessment requirements.

It is anticipated that the modification application will proceed under the section 4.55(2) approval pathway of the EP&A Act. It is anticipated that noise, blast, air quality, surface water and groundwater impacts associated with the modification project will be consistent with existing approved operations and can be managed within existing impact criteria set under PA 11_0060 and the Environment Protection Licence (EPL). An assessment of potential impacts on Aboriginal cultural heritage and biodiversity values in the areas of additional disturbance will be undertaken in accordance with relevant guidelines.

1.0 Existing Operations

The Northparkes Mine is located 27 kilometres north-west of Parkes in the Central West of New South Wales. The site is wholly located within the Parkes Shire Local Government Area.

Approved operations under PA 11_0060 are summarised in **Table 2.1**.

2.0 Proposed Modification

The Proposed Modification includes:

- construction and use of a new underground portal access (and associated infrastructure) for E22 underground mining operations
- TSF2 embankment buttressing (including associated amendments to the approved disturbance area)
- changes to TSF construction within the approved disturbance footprint associated with increased safety requirements for TSFs since first approved
- minor changes to the E31 and E31N open cut pits, including:
 - minor adjustments to disturbance areas for the approved pits and associated infrastructure (roads, safety bunds, water management etc)
 - minor increases to maximum approved mining depths
- relocation of waste rock stockpile areas for the E31 and E31N pits to avoid unnecessary material re-handling in the future due to the proposed Rocklands TSF
- relocation of rehabilitation material stockpiling areas to facilitate future development of the proposed Rocklands TSF
- establishment of clay and filter material borrow pits for TSF construction and lifts
- relocation of contractor facilities (eg site offices, crib huts and a workshop)
- realignment of a tailings pipeline to Rosedale TSF (TSF3)
- realignment of the primary water supply pipeline to the western side of the Access Road to avoid conflict with the proposed E31 waste rock stockpile area and proposed Rocklands TSF

- clarification regarding approved disturbance boundaries and the location of ancillary infrastructure within the E31 Precinct.

A new portal and associated decline to the existing approved E22 access heading is proposed to improve operational efficiencies and reduce overland ore transport. The new portal would be located in the north-eastern corner of Limestone National Forest (see Figure 1 in **Appendix A**). This area is not currently approved for disturbance. The portal would be primarily used for ore transport to the surface, however it may also be used for personnel/vehicle/equipment access in the future. The new portal would also incorporate an associated conveyor (connecting into the mine's existing conveyor system) and water management infrastructure (e.g. surge dams, dewatering sumps etc).

In addition, Northparkes has identified that the walls of TSF2 require additional buttressing to meet relevant safety standards and to enable the approved future lifts of the TSF wall to occur. This buttressing will require an adjustment to the approved disturbance boundary to the east of TSF2. The general location of this buttressing area is shown in Figure 1 in **Appendix A**.

The Proposed Modification also includes an extension to the approved Infill TSF area (refer to Figure 1 in **Appendix A**). This extension is required as a result of increased safety design standards for tailings storage facilities. The proposed infill extension area is located wholly within existing approved disturbance areas.

A review of the mine design for E31 and E31N has identified that minor adjustments to the approved disturbance boundaries of the two pits are required. Figure 1 in **Appendix A** provides a comparison of the approved and proposed disturbance boundaries for the E31 and E31N pits. In addition, Northparkes is seeking to marginally increase the approved mining depths in both pits to approximately:

- 110 m below ground level in the E31 pit (an increase of 30 m)
- 95 m below ground level in the E31N pit (an increase of 25 m).

Northparkes has also identified the potential to utilise waste rock from the E31 and E31N pits in the construction of the future Rocklands TSF, which will form part of the upcoming Northparkes E44 Rocklands Project. To avoid rehandling of this waste rock in the future (and associated noise and air quality impacts), alternate stockpiling locations have been identified within the E31 Precinct which would improve integration of these approved mining operations with the proposed Rocklands TSF construction.

Northparkes also proposes to establish a new rehabilitation material stockpiling area for topsoil, subsoil and vegetative material to the west of the Access Road. The establishment of this area would facilitate the future construction of the proposed Rocklands TSF and avoid rehandling of rehabilitation materials within the E31 Precinct. The use of this area for stockpiling soil and vegetation material also avoids further impacts on actively managed farming land as this area is not presently farmed due to its proximity to active mining operations. The disturbance footprint identified for these activities to the west of the Access Road has minimised biodiversity impacts by avoiding remnant paddock trees (pre-1990) and an area of regrowth around some of these trees. This area is located in either currently approved operational areas or land assessed as being Category 1 – exempt land under the Local Land Services Act 2012.

The relocation of contractor facilities currently located to the west of TSF2 is required as a consequence of the works required for buttressing the western side of TSF2 and construction of the infill TSF (covered by existing approvals). These contractor facilities will be relocated within the existing Approved Operational Area, in the general vicinity of the existing Administration Building. These works will include construction of crib rooms, bath house, carparking and workshop facilities similar to those which require relocation. The relocated contractor facilities will also service the E31 mining operations, and would also be used for the construction of the Rocklands TSF when approved.

The proposed modification will also include a minor adjustment to the PA 11_0060 disturbance area to align this boundary with the existing lease boundary and provide additional space for soil stockpiling in areas. This change does not involve any additional impacts on native vegetation.

A comparison between the approved development under PA 11_0060 and the Proposed Modification is provided in **Table 2.1**.

Table 2.1 Proposed Modification

Aspect	Approved Operations	Proposed Modification
Mine life	Mining operations until 31 December 2032	No change
Annual Ore Processing	No more than 8.5 million tonnes of ore per annum	No change
Operating hours	24 hours per day, 7 days per week	No change
Project boundary	As per Appendix 2 of PA 11_0060	No change
Mine plan	As per PA 11_0060	Addition of proposed E22 Portal, modifications to TSFs (TSF2 buttressing and extension of TSF infill area) and minor adjustments to the E31 and E31 pit areas as shown in Figure 1 in Appendix A
Mining method	Open cut and underground mining (including block cave and sub-level caving)	No change
Approximate Open Cut Mining Depth	E26 – 300 m below ground level (mbgl) E28/E28N – 60 mbgl E31 – 80 mbgl E31N – 70 mbgl	No change to E26, E28 and E28N E31 – 110 mbgl (increase of 30 m) E31N – 95 mbgl (increase of 25 m)
Surface infrastructure	As per PA 11_0060	Construction and use of new E22 portal access with associated conveyor and water management infrastructure Minor changes to the location of internal access roads and water management associated with TSF2 and Infill TSF works and changes to E31 precinct activities Realignment of Rosedale TSF tailings pipeline Realignment of part of the Main Water Supply Pipeline Relocation of Contractor Area within existing Approved Operational Area
Ore Handling and Processing	As per PA 11_0060	No change
Materials Handling	As per PA 11_0060	Development of temporary waste rock stockpiles for E31 Pits Improved definition of clay and filter material stockpiles associated with TSF construction. Improved definition of soil and other rehabilitation material stockpiling requirements and locations

Aspect	Approved Operations	Proposed Modification
Product Transportation	Copper concentrate is transported by truck to the Goonumbla rail siding (or, for the duration of the Goonumbla rail siding upgrade, the Parkes National Logistics Terminal) for dispatch	No change
Workforce numbers	Approximately 700 people	No change

3.0 Planning Approval Pathway

It is proposed to modify PA 11_0060 via section 4.55(2) of the EP&A Act on the basis that the development as it is proposed to be modified will be 'substantially the same development' as the development last modified under former section 75W of the EP&A Act (i.e. Modification 4).

The proposed approval pathway is considered appropriate given:

- no changes are proposed with respect to the key elements of the project, including the approved mine life, mining methods, annual production rate, hours of operation, workforce or product transportation
- no significant changes are proposed with respect to equipment use, intensity or location of works, relative to approved operations
- only minor additional native vegetation disturbance is proposed with additional disturbance areas limited to areas with a long history of agricultural disturbance
- noise, blasting, air quality, surface water and groundwater impacts remaining largely consistent with those of the approved operation and within existing criteria.

The modification will not be referred to the Commonwealth Department of Agriculture, Water and Environment (DAWE) under the *Environment Protection and Biodiversity Conservation Act 1999* as the proposed modification (having regard to cumulative impacts) is not considered likely to have a significant effect on any Matters of National Environmental Significance (having regard to cumulative impacts).

4.0 Environmental Assessment Scope

The environmental assessment process for the Proposed Modification has commenced. Northparkes has engaged Umwelt to prepare the assessment documentation for the Proposed Modification, in accordance with the requirements of the EP&A Act and *Environmental Planning and Assessment Regulation 2000* (EP&A Regulation). As the modification application is likely to be lodged in November 2021, the application will be supported by a Modification Report prepared in accordance with the Rapid Assessment Framework Guidelines.

The key potential environmental and social issues associated with the Proposed Modification and the proposed approach to addressing these issues in the Modification Report are outlined in **Table 4.1** below.

Table 4.1 Key Environmental and Social Issues and Proposed Assessment Approach

Aspect	Potential Impact	Proposed Assessment Approach
Noise and Blasting	Noise and blasting impacts associated with the Proposed Modification would be managed to meet existing noise and blasting criteria for the approved operations.	A semi-quantitative Noise and Blasting Assessment will be included with the Modification Report. This assessment will be prepared in accordance with the <i>Noise Policy for Industry</i> (NSW EPA, 2017) and relevant ANZEC guidelines however it is noted that no change to existing site criteria (which was set based on the <i>NSW Industrial Noise Policy</i>) is proposed.
Air Quality	Wind erosion associated with the additional disturbance areas is unlikely to significantly increase air quality impacts at sensitive receivers.	A qualitative Air Quality Impact Assessment will be included in the Modification Report, having regard to the <i>Approved Methods for the Modelling and Assessment of Air Pollutants in NSW</i> (EPA 2016).
Biodiversity	The Proposed Modification will require additional clearing of native vegetation in the vicinity of the proposed E22 portal and the TSF2 buttressing area. Both areas of proposed disturbance have been extensively disturbed by past grazing activities. Further confirmation of the development footprint and biodiversity surveys are required to understand the potential impact to biodiversity values. The Proposed Modification area includes areas which have been extensively disturbed by historical cropping activities and meets the definition of Category 1 – Exempt Land as defined in the <i>Local Land Services Act 2013</i>. Land category mapping has been undertaken for the site, in consultation with relevant agencies. Category 1 – Exempt Land will be exempt from assessment under the Biodiversity Assessment Method (BAM).	A Biodiversity Development Assessment Report (BDAR) will be prepared for the Proposed Modification in accordance with the BAM under the <i>Biodiversity Conservation Act 2016</i>. An area of remnant Grey Box woodland approved to be disturbed as part of the Rosedale TSF works (and covered by the existing Kokoda Offset) will no longer need to be impacted. It is proposed that some of this area of vegetation will be removed from the Approved Operational Area to compensate for part of the additional disturbance associated with the modification. The net impact to biodiversity values associated with the adjustments to Approved Operational Area will be considered in the BDAR.
Aboriginal Cultural Heritage	The E31 Precinct Area is heavily disturbed, has been extensively surveyed and is wholly contained within the study area for the E44 Rocklands Project. No intact Aboriginal sites were identified in this area during recent field surveys. The proposed E22 portal and TSF2 buttressing areas have not been previously surveyed. AHIMS site 35-06-0156 (a recorded scarred tree) is located to the east of the proposed E22 portal. This site will not be directly impacted by the Proposed Modification. The Aboriginal significance of this tree will be revisited in consultation with Registered Aboriginal Parties (RAPs) and Heritage NSW.	A comprehensive Aboriginal Cultural Heritage Assessment (ACHA) will be undertaken for the Proposed Modification including a values assessment and archaeological investigation. Consultation with RAPs will be undertaken in accordance with the <i>Aboriginal Cultural Heritage Consultation Requirements for Proponents 2010</i> (Department of Environment, Climate Change and Water, 2010), including circulation of a draft survey methodology with respect to the E22 portal and TSF2 areas not subject to previous survey. If it is concluded that 35-06-0156 is not a culturally scarred tree, and no new sites are identified during surveys, then the ACHA would not be subject to a separate 28-day consultation period (noting RAPs would

Aspect	Potential Impact	Proposed Assessment Approach
	Further confirmation of the development footprint and cultural heritage surveys (including consideration of the cultural values of the scarred tree) are required to understand the potential impact to Aboriginal cultural heritage values. Established protocols for the management of unexpected finds would extend to new proposed disturbance areas.	have an opportunity to comment on the modification as part of the public exhibition process and update to the Cultural Heritage Management Plan). Heritage NSW has advised that it does not object to this proposed approach (see Appendix B). Northparkes will also discuss the proposed approach with RAPs.
European Heritage	There are no known European heritage items located in the Proposed Modification Area.	A qualitative assessment of European Heritage impacts will be included in the Modification Report, informed by survey undertaken as part of the Aboriginal cultural heritage assessment.
Surface Water	Surface water impacts associated with the Proposed Modification are expected to be generally consistent with approved operations. Works within the Proposed Modification Area would be managed in accordance with the principles set out in existing surface water management system. The Proposed Modification would have only a negligible impact on the overall Site Water Balance. The current Water Management Plan would be updated to reflect any changes to on-site management infrastructure.	Qualitative specialist assessment of surface water impacts will be included in the Modification Report.
Groundwater	The minor proposed increase in mining depth in the E31 and E31N pits is not expected to significantly increase groundwater inflows. Total annual take is considered to remain within existing licence allocations.	Qualitative specialist assessment of groundwater impacts will be included in the Modification Report.
Visual	The visual impacts of the Proposed Modification are expected to be consistent with approved operations.	A qualitative review of visual impacts will be included in the Modification Report.
Social Impact and Opportunities	There are no proposed changes to workforce numbers or operating hours as a result of the Proposed Modification. Amenity impacts associated with the Proposed Modification are expected to be consistent with approved operations.	A qualitative review of social impacts will be included in the Modification Report. This will be informed by consultation with relevant stakeholders.

5.0 Stakeholder Consultation

Northparkes has commenced consultation with Heritage NSW and the Biodiversity, Conservation and Science Directorate regarding the Proposed Modification and proposed approach to assessment of Aboriginal cultural heritage and biodiversity impacts. The EPA will also be briefed on the Project however it is noted that the Proposed Modification will not trigger a change to the current EPL.

Northparkes has also commenced consultation with the Forestry Corporation of NSW regarding works within the Limestone National Forest. It is noted however that the changes associated with the Proposed Modification are consistent with existing access agreements.

Community stakeholder consultation (including with Parkes Shire Council) will be undertaken via the Community Consultation Committee, as well as targeted consultation with near residents and RAPs. This approach is considered appropriate for the Proposed Modification given the nature of the Proposed Modification and the consultation being undertaken for the broader Northparkes E44 Rocklands Project.

6.0 Proposed Project Timeframe

The Modification Report is expected to be submitted on or before 18 November 2021. Northparkes has advised that determination is required by the end of March 2022 in order to ensure continuity of operations at the mine.

7.0 Conclusion

It would be appreciated if DPIE would:

- confirm that section 4.55(2) is the appropriate approval pathway for the proposed changes
- advise of any further assessment requirements in addition to the proposed environmental and social assessment approach outlined above.

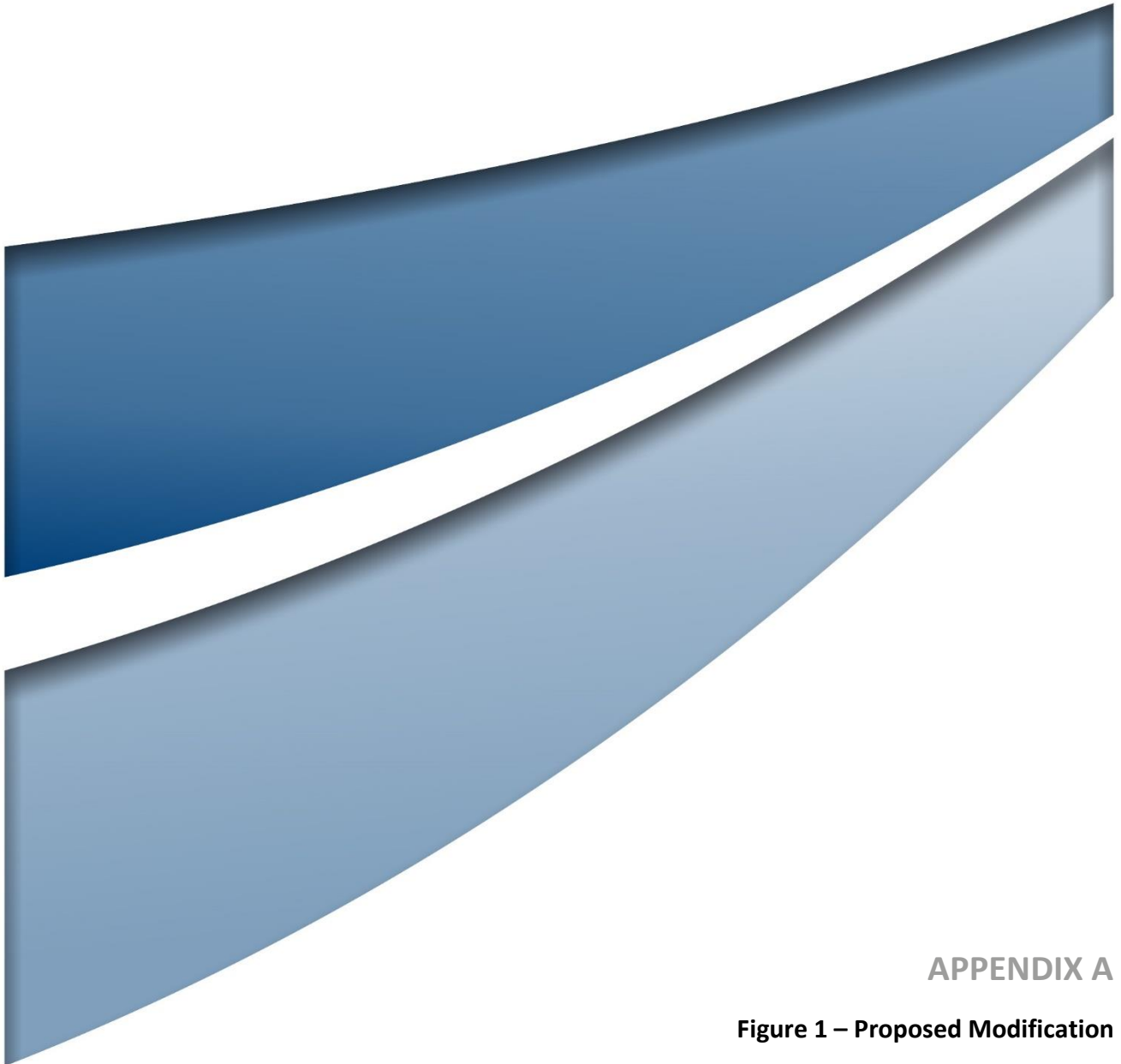
We trust this information meets with your current requirements. Please do not hesitate to contact the undersigned on 1300 793 267 or 0411 363 417 should you require clarification or further information.

Yours sincerely



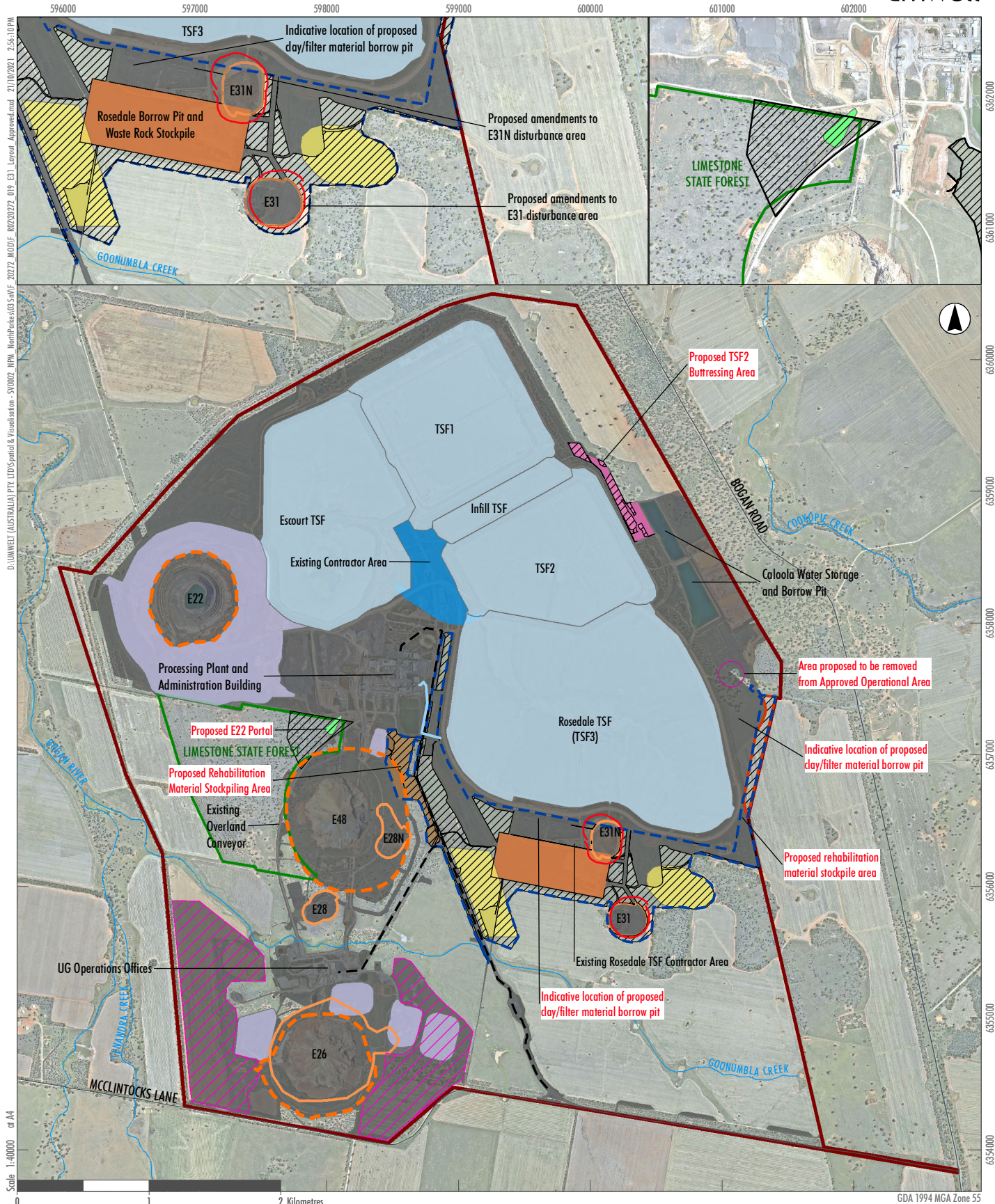
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APPENDIX A

Figure 1 – Proposed Modification



Legend

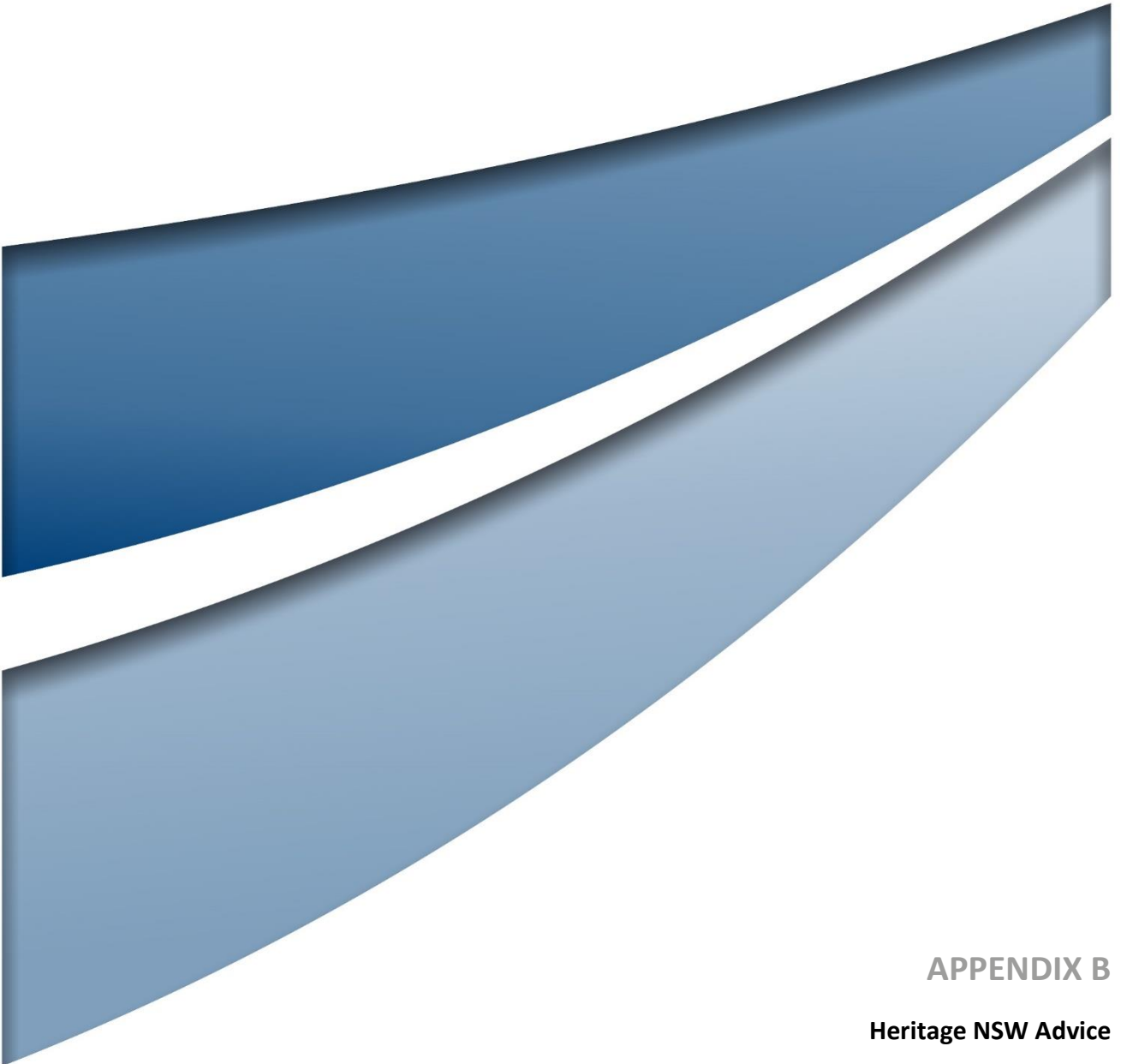
- MOD6 Project Area
- E31 Precinct Area
- Proposed E31 and E31N Pit Extents
- Proposed Extension to Project Area Boundary
- Proposed Temporary Waste Rock Stockpile
- Proposed TSF2 Butressing Area
- Proposed E22 Portal
- Proposed TSF Infill Area
- Proposed Rehabilitated Stockpile Area
- Proposed Additional Disturbance Areas
- Approved Waste Dumps
- Approved Open Cut Areas
- Approved Subsidence Limits
- Tailings Storage Facility
- Approved Rosedale Borrow Pit and Approved E31 Waste Rock Stockpile Area
- Approved Waste Rock Stockpile Area
- Approved Operational Area
- Internal Access Road
- Realigned Rosedale TSF Tailings Pipeline (indicative)
- Drainage Line
- Roads

FIGURE 1

Proposed Modification 6

Image source: NPM (2020) Data source: NPM (2021)

Note: The extent of proposed disturbance areas associated with the E22 Portal and TSF2 butressing will be confirmed following biodiversity and heritage surveys



APPENDIX B

Heritage NSW Advice



Our ref: DOC21/885806-1

Lauren Evans
Principal Environmental Consultant
Umwelt (Australia) Pty Limited
Email: Lauren Evans LEvans@umwelt.com.au
Attention: Jodie Benton jodie@ozarkehm.com.au

Dear Lauren

Northparkes Mine (MP 11_0060) - Mods, 6 & 7. Advice of Aboriginal consultation.

Thank you for the presentation meeting (8 October 2021) on the proposed Northparkes Mine approach to Aboriginal consultation for Mod 6 (E31 Precinct Modification) and Mod 7 (E22 Portal & TSF2 Buttressing Modification). Heritage NSW (HNSW) wish to reiterate that we have no issues with the proposed method for consultation.

HNSW note that the proposed streamlined consultation with the Registered Aboriginal Parties (RAPs) for the area identified as Mod 6, is for an area of intense land use disturbance history and has been subjected to an Aboriginal cultural heritage assessment. No known Aboriginal objects remain, post salvage operations. We also note that the current unexpected finds protocols will apply to new disturbance areas and that the RAPs will be further consulted.

We also note and accept the proposed consultation for the area identified as Mod 7 which will follow the standard 28-day consultation period during which, correspondences with the RAPs will be undertaken on the draft survey method for un-surveyed areas. We also endorse that the validity of a registered Aboriginal scarred tree will also be re-assessed with the RAPs during this period.

We are satisfied for the proposed consultation for Mods 6 & 7 to be submitted to the determining authority, the Department of Planning Infrastructure and Environment, for their appraisal.

If you have any questions regarding the above advice, please contact Phil Purcell, Archaeologist at Heritage NSW on 68835341 or Phil.Purcell@environment.nsw.gov.au

Yours sincerely

NICOLE DAVIS

A/Senior Team Leader Aboriginal Cultural Heritage Regulation - North

Heritage NSW

Department of Premier and Cabinet

11 October 2021