Health
Western NSW
Local Health District

Date 2 November 2021

Our ref: D21/11533

Mandana Mazaheri
Principle Planning Officer
Energy Resource Assessments
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Dear Mandana

**Western NSW Local Health District Comments on Modification report RASP Mine MP07_0018-Mod-6**

Thank you for the opportunity for the Western NSW Local Health District to make a submission on the above project.

The HHRA has addressed health impacts in the community surrounding the Mine Site related to air emissions, noise and changes in the quantity and quality of water (groundwater and surface water). It's noted a Human Health Risk Assessment (HHRA) uses a methodology consistent with the guidelines for Assessing Human Health Risks from Environmental Hazards (enHealth 2012) and the Health Impact Assessment Guidelines, Commonwealth Department of Health and Aged Care (enHealth 2017).

The HHRA has evaluated a range of metals concentrations Silver, Antimony, Arsenic, Barium, Beryllium, Cadmium, Chromium, Copper, Iron, Mercury, Manganese, Nickel, Zinc, in airborne dust and deposition to soil at a range of Human receptor sites and indicated that modelled levels were well below their respective health guidelines.

The predicted incremental increases in soil Pb potentially arising from the approximately 12-month MOD6 construction phase range from 0.03 – 2 mg/kg which represent only 0.005 – 0.43% of existing soil Pb concentrations. The HHRA is suggesting these increases can be considered small and insignificant. No mitigation measures were presented in relation to the above

The EPA makes comment from an Air Quality perspective that there are minor predicted changes to existing environmental impacts from the proposed modification activities and recommend the following conditions should be incorporated into any approval of the modification.

- No more than 500 thousand tonnes per annum (500 ktpa) of ore can be extracted

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- An Air Quality Management Plan be developed together with proactive and reactive mitigation strategies for significant and potential significant emissions sources.
- Trigger response protocols be developed and ae to be used in combination with the continuous Particulate Matter and meteorological monitors.
- Identification of clear and specific reactive mitigation measures to be implemented in accordance with the trigger response management protocol.

The EPA further requests that prior to the commencement of tailings harvesting, the proponent must update the sites air quality management plan to include proactive and reactive measures specific to managing dust emissions from all activities associated with tailings harvesting. The plan must be updated to include proactive and reactive management measures, including the use of a comprehensive water sprinkling system, portable ambient air monitoring equipment and weather forecasting to inform operational activities.

The HHRA indicates that modelling shows an increase in soil Pb from the development but are considered small and insignificant. However the burden of lead in the community has been there for many years and presents an ongoing issue and continues to present a risk to vulnerable communities. Mitigation measures need to be in place to prevent any impact on the community. No mitigation measures are proposed to manage the modelled increase in soil Pb. Lead burden in the community from the development should be reduced to no effect.

Should there be any need to obtain further detail I encourage you to contact Tim Brokenshire, Manager Environmental Health on timothy.brokenshire@health.nsw.gov.au or on 6330 5939

Yours sincerely

**Priscilla Stanley**
Manager Health Protection