



Department of Industry

OUT18/18399

Melissa Anderson
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Resource Assessments
NSW Department of Planning and Environment

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Dear Ms Anderson

Bobs Farm Sand Mine Project (6395) EIS Exhibition

I refer to your email of 22 November 2018 to the Department of Industry (DoI) in respect to the above matter. Comment has been sought from relevant branches of Lands & Water and Department of Primary Industries.

The department provides the following comments and recommendations for consideration in assessment of the proposal.

DoI – Water and Natural Resources Access Regulator

The Bobs Farm Sand Quarry EIS has presented preliminary investigation information and has not satisfactorily demonstrated that the activity could be undertaken consistent with the Objects and Principles of the *Water Management Act 2000*.

The project poses significant water quality and water level impact risks carrying potential ramifications for neighbouring GDEs. It is unlikely that the applicant will be able to obtain adequate licence shares for the full volume of water taken if dredge mining below the water table is permitted.

Quarrying below the water table is considered to be inconsistent with the principles of the WM Act and is likely to impact the water resource, water dependent assets and potentially result in a breach of the regulatory licence requirements of the *WMA 2000*.

The proposed water monitoring program requires significant improvements.

Recommendations

With respect to the dry quarrying:

- Sand extraction should be limited to a 1m buffer above the highest predicted water table.
- The proponent must comply with the regulatory licensing requirements of the *WMA 2000* for water take.

While there is currently no resolution on the ability to secure sufficient water licence entitlement, the following aspects relevant to impact and impact management should also be addressed:

- Detailed groundwater assessment should be provided prior to determination for review by DoI Water.

- Meters should be installed on all extraction bores or any pump extracting from open water bodies that intercepts the water table.
- Composted mulch should be placed on hardstand areas and a leachate collection and treatment system should be installed.
- The water monitoring strategy should be expanded to include additional long term observation sites that will not be impacted by mining, with an emphasis along the southern and northern boundary. Detailed baseline monitoring of water levels and a comprehensive water quality suite is required prior to excavation.
- Define the site boundary groundwater level and water quality impact thresholds from the baseline data. A remedial response program should be defined for any exceedance of the impact thresholds.
- A security bond to manage acid sulphate soils would be required, with the value to be determined by DoI Water.

DPI Fisheries

- DPI Fisheries has concerns with ground water quality and movement from the site, these concerns can be addressed by meeting the recommendations outlined above by DoI Water.

Any further referrals to Department of Industry can be sent by email to landuse.enquiries@dpi.nsw.gov.au.

Yours sincerely



Liz Rogers
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28 February 2019