

18 September 2019
Our ref: 1067_EGOVR:GM

Independent Planning Commission NSW
Level 3, 201 Elizabeth Street
Sydney NSW 2000

Rix's Creek South Continuation project SSD 6300

Dear Commissioners,

In our preparation of the EIS for the Rix's Creek South Continuation Project (SSD 6300), initially submitted to the Department of Planning in October 2015, five mine planning iterations were considered to determine how the deposit should be mined to provide the best overall outcome for the state, the community and the proponent. The mine design parameters were assumed to be constrained by the current consent restrictions on the maximum height of the emplacement areas. Therefore, all iterations focused on maximising overburden placement within the West Pit mining area which ultimately required an additional overburden emplacement area external to the in-pit area.

Bloomfield welcomed the Review Report from the IPCN dated 31 August 2018, which proposed a trade-off study to compare the benefits of removing the Western overburden emplacement area (OEA) against the impacts of increasing the existing North and South Pit dump heights, including an assessment of any environmental impacts (Option 1).

The Rix's Creek Continuation of Mining Project Response to IPC Recommendations report (Response), dated 7 December 2018, considered a further alternative (Option 2) which reduced the area of the Western OEA and reduced the footprint of the North Pit dump when compared to Option 1.

Although Option 1 would reduce biodiversity impacts by removing the Western OEA, this would be at the expense of disturbing established planted woodland on the North Pit dump. Option 2 provides an alternate overburden emplacement area that uses the northern part of the originally proposed Western OEA, providing the most efficient dump volume per area disturbed and removing the need to destroy the major established area of planted woodland on the North Pit dump.

The trade-off study preferred Option 2 to Option 1 due to its lower cost and increased operational flexibility allowing better management of any potential noise and air quality impacts and responses to daily weather patterns.

Support for Option 2 was provided by the Department of Planning and Environment and the Environmental Protection Authority.

- The Department accepted that *the preferred mine plan (Option 2) would provide an improved environmental outcome by reducing the area of remnant vegetation disturbance*

and supports Bloomfield's decision to proceed with Option 2 and considers that the revised landform would continue to facilitate sustainable post-mining land use outcomes.

- The Environmental Protection Authority (EPA), stated that *the preferred option apart from the original scenario [EIS case] is Option 2, a compromise between the original scenario and Option 1*

In assessing the benefits and impacts in the trade-off study we concluded that while Option 1 did provide a greater reduction in the overall biodiversity offsets required for the project it did not offer the following benefits that were achievable with Option 2:

- A greater than 15% reduction in the overall disturbance of the area classified as woodland or forest (Option 2 impact 42.58ha compared with Option 1 at 50.54ha). There have been no sightings of Squirrel Gliders in the area of the Option 2 Western OEA during the assessment period. This area was rated as low potential habitat for the Squirrel Glider due to the lack of diversity of tree species and the absence of understory vegetation.
- Greater operational flexibility as additional dump destinations allow improved management of potential air quality and noise impacts. The Option 2 Western OEA provides screened emplacement below the level of the surrounding topography with the majority of the volume of this emplacement area being at levels 20m below that of the North Pit OEA.
- The closer emplacement area allows for improved utilisation of the equipment fleet, lower Scope 2 emissions and lower haulage cost for the overburden compared with Option 1.
- Improved final landform outcomes in the area of the Western OEA with slopes designed to facilitate cattle grazing with improved productivity and final landuse income along with reduced long term erosion compared with the current landform in the area (Option 1).

Despite these conclusions and the passing of nine months since the Response was lodged, recent questions and requests for information from the IPCN are again focused on Option 1.

Bloomfield would like to take this opportunity to again refer the IPCN to the contents of the December Response and to reiterate the concluded preference for Option 2 over Option 1 due to its superior environmental, operational and commercial outcomes when compared to Option 1.

We look forward to your determination on this Project.

Yours sincerely



Geoff Moore
Chief Development Officer
The Bloomfield Group

Email: [REDACTED] | Website: www.bloomcoll.com.a