

Phillips Erin

From: Holt Eva <Eva.Holt@science.dsita.qld.gov.au>
Sent: Monday, 29 July 2013 11:17 AM
To: Rhodes Monika; Pete Jones; Rowland Philip; Dunlop Kylie; Mann Reinier
Subject: RE: Springsure Coal Mine

Thanks Monika and Pete for coming to us.

I did not note in my last email that for the metals we use the low reliability guideline trigger values (ANZECC & ARMCANZ, 2000) as interim guidelines for iron, vanadium, etc.

In future reviews of baseline data ensure that the dissolved and total metals are really clearly marked (Table 8-8 does not really distinguish but you can assume the higher values are the totals). Also double check for possible typos e.g. 11.8 mg/L of boron (total) at the upstream Springsure site seems unusually high and maybe a unit conversion oversight.

Cheers Eva

From: Rhodes Monika
Sent: Monday, 29 July 2013 10:47 AM
To: Pete Jones; Rowland Philip; Dunlop Kylie; Holt Eva; Mann Reinier
Subject: FW: Springsure Coal Mine

Dear All

Thanks for making the effort to meet today. I hope it clarified some issues, especially in respect to uncontrolled/controlled discharges. In this regard it would be good to keep the discussion going between Bandanna and Kylie in order to get suitable outcomes before the SEIS is resubmitted. Kylie, please keep me updated on the progress.

Pete, please see below comments just sent through by Eva regarding some of the issues discussed today - FYI.

Kind regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

Department of Environment and Heritage Protection
Level 9, 400 George Street, Brisbane Q 4000
GPO Box 2454, Brisbane Q 4001

From: Holt Eva
Sent: Monday, 29 July 2013 10:38 AM
To: Dunlop Kylie; Rhodes Monika
Subject: Springsure Coal Mine

Hello,

I have had another look at the SEIS (Table 8-7 and 8-8 in Chapter 8 of the SEIS). Please disregard my comment and recommendation 13 – the proponent has included in the far left column the appropriate WQOs for the Comet River (as pointed out in the meeting this morning)– its just some of the WQOs for the metals that are missing in Table 8-8 (mentioned under C4 and R4 of our comments). Sorry about that.

I also had an eyeball of Figure 18-12 in Chapter 18. Still can't see what changes they made – the wetland protection area is not there. Maybe Kylie can point it out to me? Other than that they seem to have clearly marked the wetlands upstream and downstream of the site in both original and SEIS maps.

Cheers Eva

Eva Holt, PhD
Senior Environmental Officer

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Phillips Erin

From: Rhodes Monika <Monika.Rhodes@ehp.qld.gov.au>
Sent: Tuesday, 30 July 2013 2:34 PM
To: Pete Jones; Holt Eva; Dunlop Kylie; Mann Reinier; Rowland Philip
Subject: RE: Springsure Coal Mine

Thanks, Pete

Eva, let us know if this is sufficient.

Monika

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
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www.ehp.qld.gov.au

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GPO Box 2454, Brisbane Q 4001

From: Pete Jones [mailto:PeteJones@bandannaenergy.com.au]
Sent: Tuesday, 30 July 2013 2:16 PM
To: Holt Eva; Rhodes Monika; Dunlop Kylie; Mann Reinier; Rowland Philip
Subject: RE: Springsure Coal Mine

Hi Eva,

I attach Fig 18-12 which highlights where the wetland protection areas are. They are very small to notice without highlight.

Two other relevant maps which refer to these are also attached. We have also changed the colour of the dams to maroon so as to highlight their location too. All these maps will appear within the EIS.

Trust this closes this issue out.

Thanks,
Pete

Pete Jones

Environmental Approvals Coordinator

BANDANNA ENERGY LIMITED

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From: Holt Eva [<mailto:Eva.Holt@science.dsitia.qld.gov.au>]
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To: Rhodes Monika; Pete Jones; Rowland Philip; Dunlop Kylie; Mann Reinier
Subject: RE: Springsure Coal Mine

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Pete, please see below comments just sent through by Eva regarding some of the issues discussed today - FYI.

Kind regards

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To: Dunlop Kylie; Rhodes Monika
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Cheers Eva

Eva Holt, PhD
Senior Environmental Officer

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Phillips Erin

From: Rhodes Monika <Monika.Rhodes@ehp.qld.gov.au>
Sent: Wednesday, 7 August 2013 9:42 AM
To: Pete Jones; Rowland Philip; Dunlop Kylie; Holt Eva; Mann Reinier
Subject: RE: Springsure Coal Mine Comment

Dear Pete

DSITIA (Water Assessment and Systems (WAS)) informed me that Bandanna Energy (the proponent) has provided a satisfactory response to their (WAS') recommendations listed below.

Following the meeting with DSITIA and EHP, WAS confirmed that the proponent has included the Scheduled WQOs for the Comet River in the SEIS (in their assessment/summary of baseline monitoring data for the Springsure Project - Table 8-7 and 8-8 in Chapter 8 of the SEIS).

Some of the metals WQOs were missing but that was probably due to low reliability trigger values (ANZECC & ARMCANZ 2000) for these metals. WAS would utilise these low reliability trigger values for comparison with baseline water quality data.

On the baseline water quality monitoring – the SEIS indicates that the proponent would continue with their current water quality monitoring with the goal to developing trigger values. This information would also be essential in helping to determine whether the mine causes impacts to water quality.

The proponent has referred to (Fitzroy Basin) Plan 2011 (Fitzroy WRP). This document will also give some guidance on flow objectives for the region. Having local flow objectives informed by monitoring programs is also useful especially for wetlands that are particularly sensitive to increases and decreases in flow.

If you have any further questions, please don't hesitate to contact me.

Regards

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
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Email: monika.rhodes@ehp.qld.gov.au
www.ehp.qld.gov.au

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GPO Box 2454, Brisbane Q 4001

From: Pete Jones [mailto:PeteJones@bandannaenergy.com.au]
Sent: Friday, 2 August 2013 1:13 PM
To: Rhodes Monika; Rowland Philip; Dunlop Kylie; Holt Eva; Mann Reinier
Subject: Springsure Coal Mine Comment

Hi All,

The comment below appears in EHP's latest submission on our EIS. It relates to DSITIA's initial comment on the draft EIS (also below).

The surface water and groundwater impact assessments presented in the EIS (submitted 21 June 2013) already refer to Comet River sub-catchment WQOs and EVs. Moreover, SCC intends to provide site specific WQOs for the EVs

present and monitor and manage impacts on these as legally required by EA conditions. The EM Plan has been updated since Monday's meeting with EHP's model conditions which would enable this.

Please can someone confirm this is a satisfactory response.

Thanks,
Pete

Latest Comment

Latest Recommendation

Section 18.5.4.7 Environmental Protection Objectives (page 18-85)

R13. Scheduled environmental values and water quality objectives for the region (attached) where the project occurs are as important as baseline monitoring data and should also be considered in impact assessment. EVs and the objectives used to protect or enhance these values should be detailed in the EIS and EM Plan. There are Scheduled EVs for surface and groundwater flow and Scheduled WQOs for flow objectives in high ecological value waters. Regional surface and groundwater flow objectives should also be taken into account (Queensland Government, 2011).

C13. The proponent has not fully addressed the recommendation. There is a combination of information that is used in the site specific assessment of potential impacts and to quantitatively assess the efficacy of impact mitigation and management measures. Initially, environmental values and objectives to protect or enhance these values should be identified. WAS wish to reiterate that while the baseline water quality monitoring information is important the Scheduled environmental values and water quality objectives for the region (attached) should also be considered in impact assessment.

Initial Comment

Initial recommendation

SCC

Response

Issue: Environmental Management Plan : Section 18.5.4.7 Environmental Protection Objectives (page 18-85)
The environmental protection objectives listed for water resources are scarce and apart from protecting agricultural use the only objective listed is as follows:

It is recom
to potentia

“Maintain chemical, physical and biological properties of existing water resources within acceptable parameters”

There is no consideration of protecting water flow as a protection objective, and there is a wide leeway in how “acceptable parameters” could be interpreted.

It would appear that very little time and consideration has been given to identify, and clearly assess that site-specific environmental values and environmental protection objectives for surface waters both on-site and downstream of the proposed site. This is a major concern in regards to this EIS. How can the objective be to maintain existing properties for surface waters when an inadequate assessment of local surface waters has been undertaken? If information is not currently available then the EPO's should include to an objective to comprehensively assess the local surface waterways and aquatic ecosystems and detail the spatial location of all relevant EVs (mapping).

Pete Jones

Environmental Approvals Coordinator

BANDANNA ENERGY LIMITED



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From: Rhodes Monika [<mailto:Monika.Rhodes@ehp.qld.gov.au>]
Sent: Monday, 29 July 2013 10:47 AM
To: Pete Jones; Rowland Philip; Dunlop Kylie; eva.holt@derm.qld.gov.au; Mann Reinier
Subject: FW: Springsure Coal Mine

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Cheers Eva

Eva Holt, PhD
Senior Environmental Officer

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RTI DL Release

Phillips Erin

From: Rhodes Monika <Monika.Rhodes@ehp.qld.gov.au>
Sent: Friday, 9 August 2013 8:35 AM
To: Pete Jones
Cc: Rowland Philip
Subject: RE: Lamax

Dear Pete

EHP has no further comments to make in regards to the amended Chapter 11 – Noise and Vibration. Please disregard yesterday's email which contained an old attachment.

Regards

Monika

Dr Monika Rhodes
Principal Environmental Officer
Statewide Environmental Assessments
Telephone 07 3330 6293 **Facsimile** 3330 5875
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www.ehp.qld.gov.au

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From: Pete Jones [<mailto:PeteJones@bandannaenergy.com.au>]
Sent: Tuesday, 6 August 2013 3:52 PM
To: Rowland Philip
Subject: Lamax

Hi Phil,

As discussed please find attached updated noise chapter with consideration to La max added in. Additions are highlighted in yellow in 7 sections (page nos below).

Please could you review and confirm this meets EHP's expectations?

Page nos:

- 11-8
- 11-14
- 11-16
- 11-18
- 11-22
- 11-23
- 11-25

(The majority of these are one line additions so should not be too much reading!)

Thanks for your help with this.

Pete

Pete Jones

Environmental Approvals Coordinator

BANDANNA ENERGY LIMITED

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RTI DL Release



Phillips Erin

From: Pete Jones <Peter.Jones@ghd.com>
Sent: Tuesday, 13 August 2013 9:39 AM
To: Pete Jones
Subject: FW: SCC Comments
Attachments: Response to initial comments on final EIS - DAFF.docx; Response to additional DAFF comments (26-07-2013).docx

Importance: High

Cheers, Pete

sch4p4(6) Personal info
sch4p4(8) P

From: Savage, Ross [Ross.Savage@daff.qld.gov.au]
Sent: Tuesday, 13 August 2013 9:36 AM
To: Pete Jones; Rhodes, Monika
Cc: DAFF_EIS Unit
Subject: FW: SCC Comments

Good morning

Hi Pete

I understand Fisheries comments have been sent direct to you.
Attached are comments from Biosecurity (see attachment), nothing major.
Regional Services has reviewed, and didn't identify anything significant/contentious, however, they would like to see finalised coexistence policy.

I called and left a message with the front desk.
Just to let you know i will be out of the office from 9.45 until Thursday morning.

Ross Savage, Ph: 3405 6535
Email: ross.savage@daff.qld.gov.au

From: Vitelli, Salvo
Sent: Tuesday, 13 August 2013 9:18 AM
To: Savage, Ross
Cc: DAFF_EIS Unit; Robertson, John
Subject: FW: SCC Comments
Importance: High

Salvo Vitelli
Manager, Partnering and Engagement
Biosecurity Queensland

Department of Agriculture, Fisheries and Forestry Floor 5, Primary Industries Building
80 Ann Street, Brisbane Qld 4000
GPO Box 46, Brisbane Qld 4001
t: 07 3087 8072
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e: salvo.vitelli@daff.qld.gov.au<mailto:debbie.rainbird@deedi.qld.gov.au>

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From: Savage, Ross
Sent: Tuesday, 13 August 2013 8:58 AM
To: Vitelli, Salvo
Subject: FW: SCC Comments
Importance: High

Ross Savage, Ph: 3405 6535
Email: ross.savage@daff.qld.gov.au

From: Reed, Annette
Sent: Friday, 9 August 2013 2:46 PM
To: Grimes, John; Skoien, Petra; Stewart, Richard
Cc: Diffey, Lea; DAFF_EIS Unit
Subject: FW: SCC Comments
Importance: High

Good afternoon

Please find attached Springsure Creek (Bandanna Energy) draft responses to DAFFs further comments on the EIS. If you have any issues you would like to raise please comment back to the DAFF EIS Unit email address (Cc Ross and myself) by 3pm Monday 12 August 2013.

Many thanks

Annette Reed
DAFF EIS Coordination
Agriculture Resources and Planning
Department of Agriculture, Fisheries and Forestry

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From: Pete Jones [mailto:PeteJones@bandannaenergy.com.au]
Sent: Friday, 9 August 2013 2:35 PM
To: Reed, Annette
Subject: FW: SCC Comments

Pete Jones
Environmental Approvals Coordinator
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From: Pete Jones
Sent: Wednesday, 7 August 2013 3:32 PM
To: Savage Ross (Ross.Savage@daff.qld.gov.au)
Cc: Rhodes Monika
Subject: SCC Comments

Hi Ross,

As discussed, please find our draft responses to DAFF's comments on the EIS attached. Would appreciate DAFF's confirmation that these close out any outstanding issues.

I haven't sent through the draft co-existence strategy as we still need to review internally further. However, I hope the policy we tabled today gives you an idea of what we will present in the EIS.

Appreciate your help with the EIS.

Many thanks
Pete

Pete Jones
Environmental Approvals Coordinator
BANDANNA ENERGY LIMITED

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Fax No: 07 3041 4444



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RTI/DL Release



Springsure Creek Coal Mine Project

Response to comments on final EIS



Department of Agriculture, Fisheries and Forestry

Issue	Topic	Comment	Recommendation / Suggestion	Response
1	Chapter 5 - Land	<p>1. (s5.4.6, p5-12) In response to DAFF's EIS submission no 18.16, the information in this section contains generalised descriptions of farm practices in the Central Highlands, but does not provide specific data on the Project area (RS)</p> <p>2. (s5.7.5, p5-76) The application of appropriate legislation where chemical control is the proposed mitigation measure for weeds. Herbicides such as flupropanate used to control invasive grasses like tussock, Paramatta, Giants rats tail, Chilean needle and African lovegrass, have long withholding periods and put obligations on landholders to move livestock to clean feed prior to slaughter. (BQ)</p>	<p>1. As previously requested, the EIS should address the full requirements if the TOR in particular the existing land uses, any productivity loss due to mine development and how the mine will be designed to minimise the extent of disturbance to agricultural activities.</p> <p>2. The EIS should ensure that the Project is compliant with both the <i>Chemical Usage (Agricultural and Veterinary) Control Act 1988</i> (use controls) and <i>Agricultural Chemicals Distribution Controls Act 1966</i> (licencing controls) to ensure that use of agricultural chemicals or other industrial chemicals does not have an adverse impact on human health, trade or the environment through contamination of agricultural produce. Note: It is essential that landholders are involved in consultation on uses of herbicides to ensure that appropriate risk management actions can be implemented where stock could be exposed.</p>	<p>1. Chapter 5 Land s.5.4.7 was added to the final EIS to provide an overview of agricultural practices within the Project area itself. This was based on information provided by Custom Farm Management Pty Ltd. Specific data on activities on each property within the Project area would require the landholders' disclosure of this commercially sensitive information which was not available at the time of the EIS (and indeed is perhaps not appropriate for publication within the EIS).</p> <p>S5.4.2 of the EIS was updated to provide an agricultural impact assessment based on requirements of the TOR and the information presented in s.5.4.7.</p> <p>SCC is working with all affected landholders to manage the impacts of mining on agricultural activities. Please refer to other response sheet for additional information.</p>
2	Chapter 7 – Waste Management	<p>Table 7-2, p7-10 With reference to the management methods for mulching of green waste, this section does not mention plant species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2000</i> or declared species under local government laws.</p>	<p>Species that are declared under the <i>Land Protection (Pest and Stock Route Management) Act 2000</i> or declared species under local government laws need to be identified in the survey to guide best practice management and disposal of weeds.</p>	<p>Chapter 7 Waste, Table 7-2, p7-10 and Chapter 18 EM Plan, Table 18-34, p125 has been amended to include the reference highlighted in yellow below.</p> <p>"Mulching of waste vegetation/timber by reuse on-site during rehabilitation Disposal of weeds by a licensed contractor.</p> <p>A weed survey will be undertaken to identify and (if found) manage the site of any Weeds of National Significance (WoNS), including those declared under the <i>Land Protection (Pest and Stock Route Management) Act 2000</i> or <i>Central Highlands Regional Council bylaws</i>. The Pest and Weed Management Plan will also reflect this and will guide the management and disposal of weeds onsite."</p>
3	Chapter 8 – Surface Water	<p>s8.3.2, p8-6 Further to the response to DAFF's EIS submission no.18.04 and 18.05, the EIS does not satisfy DAFF's recommendation that consultation between the proponent and DAFF occur for all waterway works that might affect fish movement.</p>	<p>The EIS should commit the Project to consult DAFF on all matters concerning potential impacts to fish movements including waterway barrier works, irrespective of their location with respect to the MLA.</p>	<p>SCC commits that for areas outside of the MLA area, a waterway barrier works approval would be sought to build any structure across a freshwater waterway whether it is temporary or permanent.</p> <p>For areas within the MLA, a waterway barrier works approval would not be required. Works would, however, be required to follow DNRM's <i>Guideline Activities in a Watercourse, lake or spring associated with a resource activity or mining operations</i>.</p>



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				<p>SCC acknowledges that the DNRM Guideline does not contain any specific measures relating to managing work around fish. Thus, in order to mitigate any potential impacts on fish passage within the MLA, SCC commits that any waterway crossings over 3rd order streams and above be constructed in consultation with DAFF.</p> <p>The following additional condition has been added to Chapter 18 EM Plan, s.18.5.4 (and also added as a clear mitigation measure to Chapter 12 Ecology, s.12.7.2 impacts on habitat connectivity and water flows).</p> <p>Interference with Waterways (D25) Any interference with waterways must be undertaken in accordance with the Department of Natural Resources and Mines Guideline – Activities in a watercourse, lake or spring associated with mining activities. Any construction of a crossing over 3rd order streams and above will be carried out following consultation with the Department of Agriculture, Fisheries and Forestry.</p>
4	Chapter 12 - Ecology	<p>1. s12.6, p12-91 The Project area may be subject to aerial spraying for the management of migratory and spur-throated locusts.</p> <p>2. 12.7.7, p12-105 & s14.6.4, p14-39 The EIS does not refer to the possible application of the Plant Protection Act 1989. For example, the whole QLD is a pest quarantine area for grape phylloxera and the Project site is located in a grape growing area. The Project also transverse the Special Control Zone (which is designated as phylloxera exclusion zone). For further information refer to – http://www.daff.qld.gov.au/4790_20983.htm#Grape.</p>	<p>1. The EIS should acknowledge that the Project area might be subject to the control of locusts, which could include aerial spraying. Any process should be developed in consultation with state and local authorities.</p> <p>2. No immediate issues are foreseen, however there is the possibility that machinery contaminated with plant pests (e.g. insects) or disease (e.g. fungi) could move to, or from, sensitive zones. While it is unlikely that plant and machinery has been in contact with grape vines, general biosecurity awareness of plant risks among the workforce can reduce the risk of introducing pests of concern into QLD. The EIS should describe the compliance strategy for the requirements of the Plant Protection Act 1989 (e.g s73 of the subordinate legislation Plant Protection Regulation 2002). For specific movement conditions refer to Inspector’s Approval 4.6 – http://www.daff.qld.gov.au/documents/Biosecurity_MovingPlantsAndPlantProducts/IA_4.6.pdf</p>	<p>1. Section 12.7.7 p.106 of the Ecology chapter has been updated to include specific mention of spur throated locusts as a potential pest and that any control measures for pest locusts will be developed in consultation with DAFF.</p> <p>“Pest and weeds, including spur-throated locusts (<i>Austracris guttulosa</i>), pose one of the most significant threats to flora and fauna within the Study area...</p> <p>...Any control measures for pest locusts would be developed in consultation with DAFF.”</p> <p>These changes are mirrored in chapter 18 EM Plan.</p> <p>2. The final EIS sets out the provisions of the <i>Plant Protection Act 1989</i> in Chapter 12 Ecology, s.12.2.6, p12-5.</p> <p>Chapter 18 EM Plan, s.18.5.8, p18-214 has been amended with to clarify SCC’s commitment to pest and weed management in accordance with all state, regional and local priorities (refer text highlighted below for changes) and is thus inclusive of all relevant Acts and policies. The remainder of this section is also provided below and demonstrate additional measures such as vehicle wash down and workforce training.</p> <p>“This [Weed and Pest Management] Plan will be developed and</p>

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				<p>implemented prior to commencement of construction through consultation with the Department of Agriculture, Fisheries and Forestry (DAFF), and managed in accordance with the requirements of state, regional and local pest and weed priorities. The Weed and Pest Management Plan will include the following measures:</p> <ul style="list-style-type: none"> ▪ Implementation of sediment control mechanisms to minimise the risk of weed seed washing into waterways; ▪ Implement control strategies outlined in DAFF weed and pest animal fact sheets and other relevant state and local government biosecurity management strategies...” ▪ Training to staff and contractors to identify priority weeds, including those identified as priorities in the CHRC area. ▪ All machinery brought to site or leaving site for other areas must be certified weed free, to prevent the import and export of weeds; ▪ An assessment will be undertaken of weeds with local and regional priorities. Management of these weeds will be incorporated into the overall Weed and Pest Management Plan; ▪ Pre-construction weed mapping should be undertaken to accurately determine the extent of weeds and pests, including weeds of local and regional priority; ▪ Vehicle wash down procedures; ▪ Minimise the use of off-road vehicle movements; ▪ Onsite waste disposal strategies (particularly for food wastes) to be employed that will not encourage the presence of pest fauna; ▪ Strategies for the storage of construction and operation materials/equipment to be employed that will not encourage the presence of resident pest fauna; ▪ Regular onsite inspections of site infrastructure/equipment for resident pest fauna and establishment of register for pest sightings; and ▪ Monitoring and weed and pest inspections particularly in responses to reported outbreaks or from complaints or

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				<p>adjacent property owners.”</p> <p>This commitment has also been carried through to s.18.5.8.7, p180-218 as a proposed EA condition:</p> <p>(K2) The Authority holder will prepare and submit a Pest and Weed Management Plan to the Administering Authority for approval prior to the commencement of construction. This Plan will align with state, regional and local government weed and pest animal priorities.</p> <p>These updates have also been mirrored in Chapter 12 Ecology, s.12.7.7.</p>
5	Chapter 16 - Economic	<p>1. (c16) In response to DAFF’s EIS submission no. 18.22, the EIS is relying on the Agricultural Research Co-existence Committee to gather and provide relevant information about impacts on agricultural production. The delivery of this work should occur prior to Project’s impacts occurring. (RS & PIF)</p> <p>2. s16.7.7.1, p16-34 The cumulative impacts that the broader project (that is, the mine and the train load out facility and transport and infrastructure corridor) needs to be examined with regard to the totality of potential impacts on existing agricultural land uses and business enterprises (i.e. productivity and yields, farming systems, cost structures and economic returns). (RS & PIF)</p> <p>3. s16.7.7.1, p16-34 The EIS references co-existence between agriculture and mining activities but is silent on how this will be formally managed and delivered for the benefit of affected landholders. The Proponent is providing a process via the Agricultural Co-existence Research Committee by which rehabilitation and productivity enhancement measures could be developed, however greater commitment to actions in this regard is sought. (RS)</p>	<p>1. As previously requested, the Project should determine or provide for an estimate of the costs and value of agricultural production that has been and continues to be generated annually from the Project area. This should be done for a period of years so that seasonal variations can be averaged out.</p> <p>2. As a demonstration of the Proponents commitment to co-existence between agriculture and mining, the cumulative impacts should be considered on a whole of project basis, not on a separate project components basis, as is the current approach. Without this undertaking, the EIS assessment and mitigation of impacts to potential affected agricultural land uses and business enterprises will remain incomplete. Note: This should be cross referenced with an update Chapter 20 – <i>Key Commitments</i>.</p> <p>3.1 The EIS should recognise the important role of Agricultural Management Plan and should commit to finalising these quickly with all affected landholders.</p> <p>3.2 The EIS should commit to detailed planning for the rehabilitation of affected land, including addressing subsidence (including earthworks and soil renovation procedures), the infrastructure to control runoff on dryland area and distribute water to irrigated areas and the agronomic approaches that will be adopted to improve agricultural productivity. The Agricultural Management Plans should contain measures to ensure that productivity and economic returns are maintained over the long term. These Plans would also contain alternative strategies should the measures proposed to restore land and maintain productivity are not successful.</p>	<p>1. Please refer to additional response sheet for information on managing impacts on productivity.</p> <p>2. Impact assessment studies in support of the proposed infrastructure corridor and train load out facility are already underway and include consideration of potentially cumulative impacts.</p> <p>This commitment has been added to Chapter 20 Key Commitments.</p>



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			<p>Notes:</p> <p>A. This should be cross referenced with an updated Chapter 20 – <i>Key Commitments</i></p> <p>B. To support the development of Agricultural Management Plan, the EIS should provide updated subsidence modelling for all affected areas, including modelling of all affected agricultural areas outside of the MLA.</p>	<p>B. Subsidence modelling and stream hydrology & flow modelling have been updated based on the latest MLA area. The results of these have been added into Chapter 5 Land, s.xxx and Chapter 8 Surface Water, s. xxx.</p> <p><u>No subsidence is predicted to occur outside of the MLA.</u></p>
6	Chapter 18 – EM Plan	<p>s18.5.8, p18-214</p> <p>With reference to the statement:</p> <p><i>“This Plan will be developed and implemented prior to commencement of construction through consultation with the Department of Agriculture, Fisheries and Forestry (DAFF), and managed in accordance with the requirements of the LP Act.”</i></p>	<p>1.1 The EIS should ensure that a weed and pest animal management plan be developed consistent with state and local pest and weed priorities.</p> <p>1.2 In addition to state and regional priorities, this plan should align with local government weed and pest animal priorities.</p>	<p>Please refer to our response to issue #4 for reply and additional commitments made to EIS in regard to weed and pest management.</p>

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Phillips Erin

From: Bleakley Ashley <Ashley.Bleakley@dnrm.qld.gov.au>
Sent: Tuesday, 13 August 2013 12:59 PM
To: Elmoultie, David; Gresswell, Rikito A.
Cc: Pete Jones
Subject: RE: Updated GW Chapter

David,

Further to our discussions below.

Providing you adjust your comments as discussed below in relation to the local experience scenario I can advise that I support the latest version of your groundwater chapter.

I support the use of the previous worst case scenario (using a vertical hydraulic conductivity for the Rewan formation of 1×10^{-5} m/day and 200m of fracturing height) as a preliminary 'base' case on which to predict impacts.

I accept that the actual height of fracturing is likely to be less but support this scenario as an appropriate preliminary conservative model run on which to base potential impacts.

I note the information provided in relation to adaptive management and support the development of this approach in the Groundwater Monitoring and Management Plan you commit to develop.

I would reiterate that the uncertainty of the vertical hydraulic conductivity of the Rewan Formation appears to be one of the more difficult challenges in this assessment. I acknowledge your intent to carry out further work, including field work at the project site, to assist in developing an improved understanding of this parameter.

I can confirm that while DNRM accept the existing model and the worst case scenario, referred to above, as an acceptable preliminary tool for estimating impacts, DNRM will require additional work on vertical hydraulic conductivity in the Rewan to be carried before an application for dewatering licence is made.

Should the new information indicate higher vertical hydraulic conductivities than have been adopted in current modelling, the licence application will need to include information from an adjusted groundwater model incorporating this additional data.

regards

Ashley Bleakley
Principal Project Officer (Hydrology)
Water Services
South
Department of Natural Resources and Mines
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ashley.bleakley@dnrm.qld.gov.au

From: Bleakley Ashley
Sent: Tuesday, 13 August 2013 12:03 PM
To: 'Elmoultie, David'; Gresswell, Rikito A.
Cc: Pete Jones
Subject: RE: Updated GW Chapter

Gents,

I have had a quick read through your yellow highlighted sections.

My only comment at this stage refers to your continued reference to the local experience scenario in justifying what is likely to happen. I have made some comments on pages 121 and 122.

In short I guess my comments are:

If you want to keep mentioning the scenario based on local experience you should qualify the reference by pointing out that you have assumed an unfractured Rewan vertical hydraulic conductivity of 1×10^{-6} m/day.

Otherwise you would need to run the same scenario with an unfractured Rewan vert hydraulic conductivity of 1×10^{-5} m/day.

But in short our position is that the 200m fracturing makes up in part for the 1×10^{-5} being perhaps too low. That is why we support it as a preliminary option on which to estimate impacts.

Hope this helps.

Ashley Bleakley
Principal Project Officer (Hydrology)
Water Services
South

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From: Elmoultie, David [<mailto:elmoultied@cdmsmith.com>]
Sent: Monday, 12 August 2013 3:53 PM
To: Gresswell, Rikito A.; Bleakley Ashley
Cc: Pete Jones
Subject: Updated GW Chapter

Hello Ashley,

As discussed Friday, please find attached the updated GW chapter with impact assessment based on worst case scenario modelling. We would like if possible to get this resubmitted by tomorrow.

Please contact me if you have any issues.

Cheers

Dr. David Elmoultie

Senior Environmental Scientist | **CDM Smith** | cdmsmith.com

| m: sch4p4(6) Personal info

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