



**RESPONSE TO SUBMISSIONS ON THE KANMANTOO COPPER  
MINE – MINING LEASE PROPOSAL (MC 4365)**

**23 May 2014**

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## 1. Introduction

Hillgrove Copper Pty Ltd (Hillgrove) operates the Kanmantoo Copper Mines, located on Mining Lease (ML), ML6345, approximately 44 km southeast of Adelaide within the Mount Barker District Council area in South Australia. The mining operation involves the development of the former Kanmantoo Copper Mine, an open pit mine that last operated in 1976.

Hillgrove commenced mining in 2011 and is currently proposing to extend the mine life by three years to 2019, via extension of the existing open pit mines. To extract the additional ore reserves within the existing ML6345, a mining lease over an area of approximately 1 ha is required to the east of ML6345. This additional area does not contain ore. However, the additional area is required to access ore at depth on ML6345, since the required slope of extended O'Neil/Nugent pit walls project the pit outside the existing ML6345.

A draft Program for Environment Protection and Rehabilitation (PEPR) for the other aspects of the extended life of mine project was submitted to the Department for Manufacturing, Innovation, Trade, Resources and Energy (DMITRE) in August 2013.

## Background

The proposed ML for this extension is on land owned by Neutrog Australia Pty. Ltd (Neutrog), an organic fertiliser manufacturer, whose operations are located approximately 130 m east of the proposed ML boundary. Mining activities on the proposed ML would include topsoil stripping and overburden removal. Surface access and standard pit windrows are expected on this lease around the pit extents. The pit area on the proposed ML will be backfilled and rehabilitated in alignment with the standard and wishes of the current land owner and outlined in the Land Access Agreement to which both parties are signatory.

The main objectives of the extended life of mine project, of which this additional ML will form part of, are to:

- Maximise economic resource recovery and the efficiency of mining operations, through the extension of the approved open cut area to recover all available copper resources of the Kanmantoo Copper Mine.
- Maintain the stimulus to the local economies of Kanmantoo, Callington and surrounding districts through employment opportunities and the supply of services required for the operation of the mine.
- Undertake all activities in an environmentally responsible manner, employing a level of control and safeguards that would ensure compliance with all legislative and regulatory requirements and appropriate criteria/goals at all times.
- Achieve the above objectives in a cost-effective manner and thereby ensure the ongoing viability of the Kanmantoo Copper Mine, maximising returns to the State as the owner of the resource through increased royalty payments.

A draft Program for Environment Protection and Rehabilitation (PEPR) for the other aspects of the extended life of mine project was submitted to the Department for Manufacturing, Innovation, Trade, Resources and Energy (DMITRE) in August 2013.

### **Purpose of this document**

The purpose of this document is to summarise the key issues raised by interested parties during the period for public comment and respond to those issues. It is important to note that extensive consultation has been undertaken by Hillgrove to inform the local community in particular of the LOM proposal including to seek feedback. This process included separate community meetings on key topics and site visits to the operations areas.

***As a direct result of these engagement processes (including the formal responses) Hillgrove is listening to our neighbours and where practicable will change our business processes to demonstrate our commitment to collaboration.***

### **Public Comment**

A total of 5 submissions were received by the closing date for public comment the 22<sup>nd</sup> of May 2014. Of these, three were from South Australian Government agencies and two were from individuals. The key issues raised in the submissions related to adherence to legislative requirements and impacts to the community and native vegetation.

**Table 1 - Summary of Key Issues**

Submission Number	Key Issues
1	<p><b><i>The respondent states they object to the MLP because:</i></b></p> <ul style="list-style-type: none"> <li>• The current operation is not adequately addressing issues related to noise and dust.</li> <li>• Regulation is inadequate.</li> <li>• The company exhibits a lack of empathy with the community.</li> <li>• Impacts of B-Double trucks servicing the mine.</li> <li>• Hillgrove has no formal complaints system and lack of follow up.</li> <li>• Lack of independence of the consultative committee chairperson.</li> <li>• The composition of the consultative committees' membership.</li> <li>• Lack of progress for community contribution suggestions.</li> </ul>
2	<p><b><i>The respondent requests:</i></b></p> <ul style="list-style-type: none"> <li>• That the area of the MLP be rehabilitated with native vegetation.</li> <li>• That the mine is creating a larger ecological footprint.</li> </ul>
3	<p><b><i>The respondent advises:</i></b></p> <ul style="list-style-type: none"> <li>• That all aboriginal sites and objects are protected under the Act.</li> <li>• Advises that any discovery of sites and objects must be reported and that it is an offence to disturb them.</li> </ul>
4	<p><b><i>The respondent advises:</i></b></p> <ul style="list-style-type: none"> <li>• That citation to work health and safety legislation requires updating.</li> <li>• Updating of the Principal Hazard Management Plan is required in relation to blasting.</li> </ul>
5	<p><b><i>The respondent advises:</i></b></p> <ul style="list-style-type: none"> <li>• No EPA licence will be required in relation to the activities on the proposed Mining Lease.</li> </ul> <p><b><i>The respondent raises concerns in relation to the Life of Mine Extension in relation to:</i></b></p> <ul style="list-style-type: none"> <li>• Adequacy of assessment criteria for dust and the need for improved dust management.</li> <li>• Clarification of the % volume of potentially acid forming waste and its storage.</li> </ul>

## Hillgrove's response to the public comment submissions

### Response to Issues Raised

#### Submission 1

##### **The current operation is not adequately addressing issues related to noise and dust.**

The existing operation is engaged in continuously reducing the impacts from operations. While it is noted that the operation complies with existing regulation, firm acknowledgement has been publicly given at regular community meetings that we need to better than achievement of regulatory standards alone. KCM has continued to formulate a community action plan in conjunction with community representatives to achieve this outcome. This plan is located on the Hillgrove Resources webpage for public access and is reviewed at community meetings. Since the commencement of the specific consultation in regard to the life of mine extension multiple items on the action plan have been achieved and inspected by community representatives. KCM is committed to achieving the actions in the plan.

##### **Regulation is inadequate**

We acknowledge that community is dissatisfied with regulation and this is why we have endeavoured to achieve practices that are better than regulation alone through commitment to best practice and establishment of the Community Action Plan.

##### **The company exhibits a lack of empathy with the community**

KCM are fostering open understanding of issues through public meetings and full disclosure of its operations. We acknowledge the failure of the consultation process that has been in place with regular advertised quarterly public meetings and newsletters since 2006 and hence we have re-invigorated the process with more frequent meetings and a re-structuring of the community consultative committee. This process has increased the sites awareness of our impacts beyond those who regularly attended and have maintained involvement. Our impacts are discussed regularly on site at meetings and are integrated into work practices on site and the message to all that we need to maintain or "social licence to operate" if we wish to remain in operation is reinforced at every level.

##### **Impacts of B-Double trucks servicing the mine are generating dust**

We do not use B double trucks, although we do utilise standard heavy trucks. We acknowledge our commitment to use a local supplier of quarry products has increased the trafficking of quarry truck via an unsealed road through Kanmantoo generating dust. The dust impact from the use of this road has been raised with the council at several meetings by community consultative committee and gallery members in attendance to elevate the issue in an effort to have the council consider improving this road surface. In future we may consider obtaining products from a different quarry to remove our contribution to this problem.

##### **Hillgrove has no formal complaints system and lack of follow up**

KCM has had in place a formal complaints system that has been communicated to the community since 2010 as part of the finalisation of mine permitting. The process of feedback occurs directly to individuals if requested and a summary of complaints has been presented quarterly at community consultation meetings since 2010 and minutes uploaded to the website. KCM acknowledges that in the case of follow up to your complaints that contact has been made with you and your complaints logged in the system. Specific feedback and information has been supplied. On one occasion your complaint was not acknowledged for 6 days because no name or phone number was left by you. If any specific suggestions for the improvement of the

complaints process can be made we would consider them. Your residential area has been included in routine noise monitoring.

**There is a lack of independence of the consultative committee chairperson**

The committee chairperson is paid by KCM. His services are those of a professional and therefore incur a fee. The chairperson has a private business called Community Engagement Group Australia (CEGA) whose execution of consultation for numerous groups is reliant of fairness and unbiased management of proceedings to give the process integrity.

**The composition of the consultative committee's membership lacks an independent industry expert**

The composition of the committee attempts to represent relevant interest groups including Kanmantoo Action Group membership. There are a number of independent experts scheduled for upcoming meetings. Any suggestions for improvement can be submitted to the committee or the chair.

**There is a lack of progress for community contribution suggestions**

Community feedback has been summarised from the community forums and is available on our website.

[http://www.hillgroveresources.com.au/article/Kanmantoo\\_Committee/Kanmantoo\\_Copper\\_Mines\\_Community\\_Committee](http://www.hillgroveresources.com.au/article/Kanmantoo_Committee/Kanmantoo_Copper_Mines_Community_Committee)

**Submission 2****Requests that the area of the MLP be rehabilitated with native vegetation and expresses concern that the mine is creating a larger ecological footprint.**

The area of the MLP does not belong to Hillgrove during or after the cessation of mining it is leased from our neighbour. The land owner operates a fertilizer factory on this land and wishes it to remain suitable for industrial use.

Yes the mine is getting larger and the overall footprint for the entire area of disturbance will increase by 11%. With regards to this Mining Lease Proposal there is no additional footprint as the area is currently industrial and will remain so once completed. This is balanced by the provision of considerable offsets being re-established on and off (neighbouring land) the mining lease that creates an overall increase of ten times more native vegetation than the operation removes. Please review our Native Vegetation Management Plan on our website Community/EPBC\_Extension\_Information.

[http://www.hillgroveresources.com.au/article/Kanmantoo\\_Committee/Kanmantoo\\_Copper\\_Mines\\_Community\\_Committee](http://www.hillgroveresources.com.au/article/Kanmantoo_Committee/Kanmantoo_Copper_Mines_Community_Committee)

The NVMP and other supporting documents explain numerous methods to re-establish vegetation from regular seed collection, production and storage with viability testing to broad scale planting and seeding methods as well as tissue culturing, propagation and plant rescue. As another means of mitigating the immediate impact, enhancement programs have been underway in advance of clearing in order to increase the capacity of native vegetation patches to provide additional habitat and resources.

**Submission 3****Advises that all aboriginal sites and objects are protected under the Act and that any discovery of sites and objects must be reported and that it is an offence to disturb them.**

KCM acknowledges the advice and complies with the Act.

**Submission 4****References to work health and safety legislation require updating**

All references to the old Occupational Health Safety and Welfare Act (1986) have been replaced with Work Health and Safety Act 2012. Suggested additions to the list of legislation have been made.

**Updating of the Principal Hazard Management Plan is required in relation to blasting**

The plan has been updated since this submission. A further review of the plan (including blast fumes) is currently underway as part of the Principal Hazard Management Plan. The criteria set in our Mining Lease conditions for an (non-sensitive) industrial receptor is 125dB and 25mm/s at Neutrog.

*\*NB the reference to odour impacts relate to those from the fertilizer factory and not the mining operation.*

**Submission 5****An EPA licence will not be required in relation to the activities on the proposed Mining Lease.**

KCM acknowledges your clarification that a licence issued by the EPA will not be required.

**There is concern in relation to the Life of Mine Extension in regard to the adequacy of assessment criteria for dust and the need for improved dust management**

Criteria is being reviewed by regulators including the EPA as part of the Life of Mine Extension process. This has included additional plan development in relation to management of dust.

**Clarification is needed of the % volume of potentially acid forming waste and its storage.**

The inconsistency in the document will be rectified when it is reintegrated into the Life Of Mine PEPR document. All waste from the MLP area is 100% non-acid forming (NAF).

## **2. Conclusion**

***Hillgrove is committed to implementing our business practices over and above regulatory practices and to be held accountable for our impact.***

Hillgrove has demonstrated its capacity to undertake safe and compliant mining at the Kanmantoo Copper Mine and still take into account local community concerns. The current proposal for a Mining Lease adjacent to the existing lease allows an extension to the mine life and therefore additional local and State economic benefits, while allowing the resource to be developed to its full potential.

## **3. Attachments**

Submission documents

# **SUBMISSION ONE**

## Susan Wilson

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**From:** D&C <liions@zoomail.sent.com>  
**Sent:** Wednesday, 21 May 2014 2:14 PM  
**To:** DMITRE:MiningRegRehab  
**Subject:** Kanmantoo Mine Expansion Proposal

As a resident of Kanmantoo I wish to oppose the proposed expansion of the adjacent Hillgrove mine because although the management claim to be mindful of operating so close to a community they are not currently addressing the issues of dust and noise to the community's satisfaction. The current guidelines established by DMITRE are not satisfactory and appear to be little more than the minimum requirements under Australian law. Both DMITRE representatives and Hillgrove management have exhibited a lack of empathy of the effects that the dust and noise have on the amenity of nearby residents and have been unable to achieve improvements which satisfy community requirements.

During a tour of the mine undertaken in December 2013 I witnessed poorly maintained machinery which would have directly contributed to the amount of dust generated by the mine. This was at a time when Hillgrove was attempting to gain community approval for the mine expansion and seemed counterintuitive to the company's assertions that they were operating with concern for the community.

The increase in the number of b-double trucks servicing the mine using inadequately maintained dirt roads has created significant dust, noise and damage to local infrastructure, and both state and local governments appear reluctant to address this issue.

Hillgrove has no formal complaints system and there are no means of submitting written complaints via it's website or of obtaining written replies. I have attempted to obtain information in several forums (in person at meetings, via email and telephone) on numerous occasions and have met with little or no response. Some of the information I have been provided with has proven to be out of date or inaccurate. Offers made by the company to involve me in their noise monitoring programme have not been followed up.

The KCCCC chair position is directly funded by Hillgrove which creates a perception of a conflict of interest. At the meetings that I have attended I have not observed either the KCCCC chair, the DMITRE representative or any local or state government representative offer any comment which criticises Hillgrove and supports the community, again creating a perception of a conflict of interest. There is no independent industry expert on the KCCCC to inform and advise the community about Hillgrove's operations. As a consequence, the community feels disempowered and disenfranchised and that no one is advocating on their behalf.

During the Community Consultation Process Hillgrove sought input from local residents as to how it could contribute to the community. A number of suggestions were made, some of which were low cost, but Hillgrove has chosen not to proceed with them.

In summary, while Hillgrove has repeatedly stated its commitment to the local community and to addressing community concerns about dust and noise it has been unable to achieve meaningful outcomes, and state and local governments have been largely ineffective in safeguarding the amenity of local residents. For this reason I oppose the current expansion proposal.

Regards

Catherine Burton

# **SUBMISSION TWO**

## Susan Wilson

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**From:** Lynda Yates <mallynd@aapt.net.au>  
**Sent:** Sunday, 18 May 2014 11:52 PM  
**To:** DMITRE:MiningRegRehab  
**Subject:** Kanmantoo Copper Mine Expansion

The Commonwealth Environment Minister recently granted environmental approval for Hillgrove Resources Ltd's proposal to expand the Kanmantoo Copper Mine. Now there is another proposed extension for 2.1Ha of vacant industrial land at Neutrog Fertiliser Factory adjacent to ML6345.

I do not know whether the recently approved expansion required remediation and revegetation after use but I would hope so as this was on previously undisturbed remnant vegetation of ecological importance. I note that the proposed mining for the latest proposal will be short-term only but **will not** remediate and revegetate the land after its use other than return it to its current vacant and weed-prone "industrial" state. As the land is obviously unused, I believe that the conditions for granting this expansion should be that the land is improved rather than just returned to its current state. It should be revegetated with local native plants as it is on a site next to the mine and could act as a buffer zone with shielding vegetation cover. I am concerned that the mine is expanding and creating a larger ecological footprint and damage to flora and fauna so believe the company should do as much as possible to remediate the land after use so as to return the whole area to as healthy an ecosystem as possible for the future.

Lynda Yates

6 Young St Seacliff SA 5049

0417 484 717

[mallynd@aapt.net.au](mailto:mallynd@aapt.net.au)

# **SUBMISSION THREE**



Physical Id. DPC14D02286  
File No. DPC14/0168

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Fax 08 8226 3535  
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Megan Wilson  
Business Support Officer  
Department for Manufacturing, Innovation, Trade, Resources and Energy  
Level 5, 101 Grenfell Street  
ADELAIDE SA 5001

Dear Megan

Thank you for your correspondence (email) dated 24 April 2014, regarding the application area Mineral Claim 4365 for the recovery of minerals (copper, gold silver), located in Piece 100, Deposited Plan 88742, Hundred of Kanmantoo. Approximately 44 km southeast of Adelaide.

I advise that the central archive, which includes the Register of Aboriginal Sites and Objects (the Register), administered by the Department of the Premier and Cabinet-Aboriginal Affairs and Reconciliation Division (DPC-AARD), has no entries for Aboriginal sites in the mineral claim area.

The applicant is advised that sites or objects may exist in the proposed development area, even though the central archive does not identify them. All Aboriginal sites and objects are protected under the *Aboriginal Heritage Act 1988* (the Act), whether they are listed in the central archive or not. Land within 200 metres of a watercourse (for example the River Murray and its overflow areas) in particular, may contain Aboriginal sites and objects.

Pursuant to the Act it is an offence to damage, disturb or interfere with any Aboriginal site or damage any Aboriginal object (registered or not) without the authority of the Minister for Aboriginal Affairs and Reconciliation (the Minister). If the planned activity is likely to damage, disturb or interfere with a site or object, authorisation of the activity must be first obtained from the Minister under Section 23 of the Act. Section 20 of the Act requires that any Aboriginal sites, objects or remains discovered on the land must be reported to the Minister. Penalties apply for failure to comply with the Act.

It should be noted that this Aboriginal heritage advice has not addressed any relevant obligations pursuant to the *Native Title Act 1993*. Native title advice is provided by the Native Title Section of the Crown Solicitor's Office.

For further information please contact the Aboriginal Heritage Team on telephone (08) 8226 8900.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Perry Langeberg'.

Perry Langeberg  
**SENIOR INFORMATION OFFICER (HERITAGE)**  
**ABORIGINAL AFFAIRS & RECONCILIATION DIVISION**

05 May 2014

# **SUBMISSION FOUR**

## Susan Wilson

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**From:** Wong, Chor (DPC) <Wong.Chor@dpc.sa.gov.au>  
**Sent:** Thursday, 22 May 2014 3:30 PM  
**To:** Ashenden, Diona (DMITRE)  
**Cc:** Wilson, Megan (DMITRE); Sauer, Graeme (DPC); Spinks, Christopher (DPC); Brammy, Luke (DPC)  
**Subject:** FW: Request for Comment on Mining Proposal - T02971 MC 4365

Dear DMITRE.Mining RegHab,

I forward the SWSA comments (in **RED** ) on this Mining proposal, with reference to : Document MPA1964914[1], titled below:

Hillgrove Resources  
Kanmantoo Copper Project  
Mining Lease Proposal for new ML Adjacent to  
ML6345  
9 April 2014

Page 12 4.1 South Australian Legislation  
Other Relevant Legislation

*....delete Occupational Health Safety and Welfare Act 1986*

*...add*

- *Work Health and Safety Act 2012*
- *Dangerous Substances Act 1979*
- *Electricity Act 1996*

Page 13 5.2 Ambient Air Quality, Odour and Noise Levels

...“Nearby residents to the east and northeast of the factory are occasionally affected by the odour and have been known to make complaints to the EPA.

*Also requires best industry practice for control of blast fumes*

Page 38 Vibration and blasting impact and table 9.4

*.... also ensure the control of blasting risks from explosion is addressed in the Mine Operator’s Principal Hazard Management Plan (ref WHS Act 2012, Regulation Reg 627)*

Page 55 Table 9.5 Item 17. Blasting – airblast, vibration

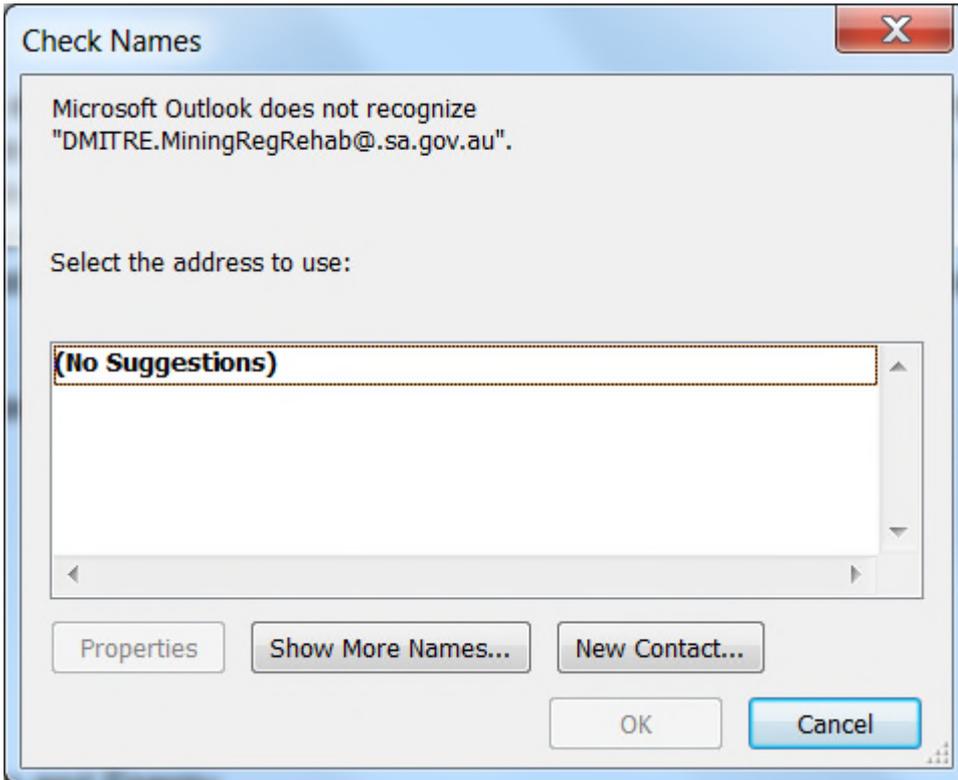
*Why do the air blast and vibration compliance criteria maximum of 125 dB and 25 mm/s at the Neutrog Facility not comply with AS 2187.2?*

Appendix 7 Blast Impact Report and Blasting Procedures (Hillgrove, 2013

*Blast Impact Report June 2008, Standard Operating Procedure 2/07/08 and Management Plan Blasting 2/07/08 need to be updated to address current and proposed risks.*

If you require further clarification, please contact Graeme Sauer or me.

Please note: [DMITRE.MiningRegRehab@.sa.gov.au](mailto:DMITRE.MiningRegRehab@.sa.gov.au) is not a valid email address



Regards

**C. S. Wong**

Chief Officer – Specialist Services

Chief Advisor – Electrical

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**From:** Sauer, Graeme (DPC)  
**Sent:** Thursday, 22 May 2014 3:13 PM  
**To:** Wong, Chor (DPC)  
**Cc:** Spinks, Christopher (DPC); Brammy, Luke (DPC)  
**Subject:** RE: Request for Comment on Mining Proposal - T02971 MC 4365

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**From:** Wong, Chor (DPC)  
**Sent:** Thursday, 22 May 2014 12:25 PM  
**To:** Sauer, Graeme (DPC); Brammy, Luke (DPC); Spinks, Christopher (DPC)  
**Subject:** FW: Request for Comment on Mining Proposal - T02971 MC 4365

# **SUBMISSION FIVE**

EPA Ref: 27762

DMITRE Ref: (ML6345)

Megan Wilson  
Business Support Officer  
Mining Regulation  
Level 3, 101 Grenfell Street  
ADELAIDE SA 5001

Dear Megan,

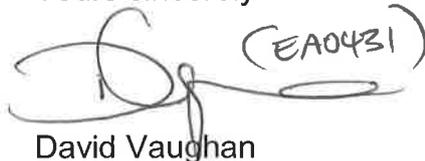
**Re: Mining Lease (ML) Proposal for new ML adjacent to ML 6345**

Thank you for DMITRE's email (date received 24 April 2014) regarding Hillgrove Copper Pty Limited (Hillgrove) mining application on Piece 100, Deposited Plan 88742, Hundred of Kanmantoo. This ML proposal is to extend the 2.1ha of land east of the existing ML6345 that is proposed to be mined as part of the extend life of mine project. The proposed ML area is in the Mount Barker District Council Local government area and owned by Neutrog (a manufacturer of organic fertilizers).

Attached is a quick assessment from the Authority of the proposal based on the short turnaround time given.

For further information on this matter, please contact Lu Bai (Senior Environment Protection Officer) on 8204 2070 or [lu.bai@epa.sa.gov.au](mailto:lu.bai@epa.sa.gov.au).

Yours sincerely

 (EA0431)

David Vaughan

**DELEGATE  
REGULATION & COMPLIANCE DIVISION  
ENVIRONMENT PROTECTION AUTHORITY**

Date: 12/5/2014

## **Re: Mining Lease (ML) Proposal for new ML adjacent to ML 6345**

### **General**

Hillgrove commenced mining at Kanmantoo in 2011 and is currently proposing to extend the mine life by three years to 2019, via extension of the existing open pit mine. An additional ML is required to access ore at depth on ML6345.

Given the additional ML does not contain ore and only includes topsoil stripping and overburden removal activities, the Authority considers that no licence is required for this proposal under the EP Act. However, the Authority has some concerns, based on the current Hillgrove operation and the activities that may be undertaken on the proposed ML.

### **Specific Comments**

#### ***Environment Protection Authority (EPA) Guideline for Separation Distances***

This proposal is not covered under EPA Guideline for Separation Distances, however, information provided in the proposal indicates that the closest residences are located within 1km of the ML boundary. Although the mine extension project is not assessed as part of this proposal, Hillgrove is reminded of their duty under S25 of the EP Act to take all reasonable and practical measures to minimise environmental harm (particularly in regard to potential off site noise and air quality impacts for the extension project).

<b>Aspect</b>	<b>Proposed management measures</b>	<b>EPA Comments</b>
<b>Dust</b>	<p>Page 42: PM10 monitoring with real time samplers demonstrates compliance outside ML with NEPM criteria of annual PM10 &lt; 50 ug/m3/d with &lt;5 days exceedance per year.</p> <p>Table 9.5: Alert trigger levels detailed in Appendix 6.</p> <p>Appendix 6: The E-BAM monitor does not specifically comply with the BAM FEM.</p>	<p>The Authority considers this proposed assessment criteria is not in itself adequate to demonstrate that impacts to local residents arising from nuisance dust are being effectively managed.</p> <p>The Authority considers the trigger levels are convoluted and no management plan has been presented to demonstrate the effective management of nuisance dust impacts.</p> <p>The Authority also notes in the stakeholder consultation section that there was a need for improved dust management. Hillgrove therefore needs to address this issue further.</p>
<b>Surface water management</b>	<p>Page 22: There are no creeks or drainage lines to be affected by the development. Surface water management will comprise the management of incident rainfall and runoff only. Incident rainfall into the pit will be collected using in-pit sumps located on ML6354. A berm will be constructed along the pit perimeter to prevent any clean surface water runoff from entering the pit.</p>	<p>The Authority considers the proposed surface water management measures to be adequate. However the issue of PAF/NAF material management is not clear (see discussion below).</p>
<b>Groundwater</b>	<p>Page 21: The excavation will be approximately 50m deep. No dewatering will occur on the ML.</p> <p>Page 41: New ML is considered to be within existing drawdown cone.</p>	<p>The authority suggest this be assessed in the overall mine life extension project, especially with regard to management of any potentially acid forming (PAF) material identified by the proposal.</p>

<p><b>Waste</b></p>	<p>Page 20: Table 6.1 0.56Mt of waste comprising approximately 25% non acid forming (NAF) waste and 75% potentially acid forming (PAF) waste rock will be produced on the new ML. Page 21: S6.5 Waste Rock Waste rock material excavated from the new ML has been determined as non-acid forming (NAF) based on the current resources block model.  No revegetation of the new ML is proposed as it will be returned to industrial land use.</p>	<p>The Authority finds that Table 6.1 and Section 6.5 of the document appear to be contradictory. From this, it is not clear whether the majority of waste rock material is PAF or NAF.  If 75% of the waste rock material IS PAF, clarification is needed as to where and how PAF material will be stored and managed prior to backfill to minimise any potential impacts of acid formation.</p>
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