

Environmental Protection Act 1986

Section 43A

STATEMENT OF REASONS

CONSENT TO CHANGE PROPOSAL DURING ASSESSMENT

Proposal: Ravensthorpe Gold Revised Project

Proponent: ACH Minerals Pty Ltd

Decision

For the reasons outlined below, the EPA has determined to consent to the Proponent changing the Proposal outlined in Schedule 1 attached to this Statement of Reasons.

Background

On 13 December 2016, ACH Minerals Pty Ltd (ACH) referred the Ravensthorpe Gold Revised Project (the proposal) to the Environmental Protection Authority (EPA) under section 38 of the *Environmental Protection Act 1986* (EP Act). The proposal is a revision of the Philips River Gold Project conditioned under Ministerial Statement 716. The proposal is to mine and process gold and copper from the Kundip Mine Site and Myamba Mine Site, located approximately 17 kilometres (km) and 26 km respectively, southeast of Ravensthorpe in the Shire of Ravensthorpe.

The proposal includes open pit and underground mining, two Waste Rock Landforms, dewatering of mine pits, a Tailings Storage Facility, a processing plant and ancillary support infrastructure. An overland, two-way water pipeline is proposed to join the Kundip and Myamba Mine Sites, parallel to the Hopetoun-Ravensthorpe Road corridor and the Kundip Nature Reserve.

The EPA determined to assess the proposal at the level of Public Environmental Review (PER) with a four week public review period on 22 March 2017.

ACH has prepared a draft Environmental Scoping Document (ESD) for the proposal. Prior to the consideration of the draft ESD by the EPA, ACH requested a change to the proposal under section 43A of the EP Act. EPA Services notes that the ESD would be updated in accordance with the requested change to proposal, should it be considered minor as defined under section 43A of the EP Act.

Relevant Statutory and Administrative Provisions

Section 3.8 of the *Environmental Impact Assessment (Part IV Divisions 1 and 2) Procedures Manual 2016* guides what information the EPA requires from a person wanting to change its proposal during assessment.

In considering the request for consent, the EPA considered the:

- details of the proposed change
- statement of the significance of the change and
- rationale for the change.

Materials considered in making this decision

In determining whether to consent to ACH changing the proposal the EPA has considered the following:

1. the proposal documentation, as referred to the EPA;
2. advice sought from decision-making authorities through the referral and scoping processes;
3. the section 43A request from ACH received on 14 December 2017; and
4. relevant EPA policy and guidance documents.

Consideration

1. Nature of the proposed change

The proposed change consists of:

- a decrease of the development envelope from 516 hectares (ha) to 512 ha;
- a decrease of the Kundip Mine Site disturbance footprint from 252 ha to 152 ha; and
- a decrease of Myamba Mine Site disturbance footprint from 64 ha to 46 ha.

The proposed changes relate to a redesign and optimisation of the proposal undertaken by ACH. The outcome of which sees a reduced footprint requirement for some physical elements, including but not limited to, the mine pits, Waste Rock Landforms, Tailings Storage Facility and processing plant.

As part of the redesign and optimisation process, ACH has also demonstrated application of the mitigation hierarchy to avoid and minimise the impact of the proposal into the receiving environment.

As a result of the above, the changes requested under section 43A will facilitate the following:

- reduced ground disturbance and overall clearing of native vegetation at the Kundip Mine Site;
- reduced impact to conservation significant flora, fauna habitat and vegetation communities at the Kundip Mine Site;
- reduced ground disturbance at the Myamba Mine Site;
- smaller mine pits left at closure;
- reduced impact to creek lines in the vicinity of the Kundip Mine Site; and
- the requirement of one Waste Rock Landform instead of two at the Kundip Mine Site.

No changes to operational elements of the proposal have been requested at this time.

The proponent has also requested that we refer to the proposal as the Ravensthorpe Gold Revised Project, rather than the Ravensthorpe Gold Copper Revised Project.

2. Stage of the assessment process

On the 22 March 2017, the EPA set the level of assessment for the proposal as PER with a four week public review period. The ESD is still in draft and will be updated to include the change to the development envelope and disturbance footprint before finalisation by the EPA.

3. Currency, relevance and reliability of the information, including submissions

The proposal was referred to the EPA in December 2016 and all information submitted in support of the referral remains current. The proposed change to the development envelope for the proposal occurs in the same area in which ACH's environmental investigations are being undertaken. ACH has provided the EPA with updated spatial data for the change to the development envelope and disturbance footprint.

4. Community engagement

The EPA has engaged with the community through the referral process and intends to release this decision document on its website for public information. The EPA will engage with the community throughout the PER process, including a four-week public review period.

5. Level of public concern

The EPA received three comments during the seven day comment period on the referral, all requested a PER level of assessment. The proposal is PER with a four-week public review period.

Consideration of Whether the Change is Unlikely to Significantly Increase Any Impact that the Proposal May Have on the Environment

The following were considered:

a) Values, sensitivity and the quality of the environment which is likely to be impacted

The EPA Chairman's determination identified the preliminary environmental factors for the original proposal as:

- Flora and Vegetation;
- Terrestrial Fauna;
- Terrestrial Environmental Quality;
- Hydrological Processes; and
- Inland Waters Environmental Quality.

The EPA Chairman also identified that Social Surroundings and Air Quality should be considered as Other Factors within the assessment process.

The change gives no cause for additional environmental factors to be considered key environmental factors for the purposes of the assessment.

b) Extent (intensity, duration, magnitude and geographic footprint) of the likely impacts

The section 43A change represents a 40% reduction in the clearing required for the Kundup Mine Site. The proposed Kundip Mine Site contains tracts of good quality native vegetation, including vegetation associated with two Priority Ecological Communities, that is fragmented by disturbed areas from previous mining activities. The EPA considers that the proposed change to reduce clearing at the Kundip Mine Site is not a significant change and reduces impacts.

The section 43A change represents a reduction of the disturbance footprint at the Myamba Mine Site by almost 30%. The Myamba Mine Site is located on cleared farmland, and therefore has considerably less environmental value than the Kundip Mine Site. The EPA also considers that the proposed change to reduce disturbance at the Myamba Mine Site is not a significant change and reduces impacts.

The magnitude and geographic footprint of the likely impacts have reduced as a result of the change to proposal. The intensity and duration will remain unchanged over the proposals seven-year life.

c) Consequence of the likely impacts (or change)

The change represents a 40% reduction in the clearing required for the Kundip Mine Site. The reduction in impacts of clearing will reduce the overall impact of the proposal.

d) Resilience of the environment to cope with the impacts or change

The EPA considers the resilience of the environment to cope with the changed proposal remains unchanged from that of the original proposal, should it be implemented.

e) Cumulative impacts with other projects

The change represents a decrease in total clearing of native vegetation required for the proposal, which will decrease the potential for cumulative development pressures from the proposal.

f) Connections and interactions between parts of the environment to inform holistic view of impacts of the whole environment

The change to the proposal does not alter any connections or interactions with the receiving environment different to the original proposal.

g) Level of confidence in the prediction of impacts and the success of proposed mitigation

There is no significant change to the level of confidence in the predicted impacts and the success of proposed mitigation.

h) Public interest about the likely effect of the proposal, if implemented, on the environment, and public information that informs the EPA's assessment

Three comments were received during the seven-day public comment period following the referral of the proposal to the EPA. The level of public interest is not expected to change given the nature of the proposed changes (non-significant) to the proposal.

Schedule 1

Change to Proposal*

Element	Current Proposal (as referred)	Changed Proposal (section 43A)
<i>Physical elements Kundip Mine Site</i>		
Mine Pit (Kaolin Pit)	Clearing of approximately 66 ha within a development envelope of 366 ha, mining above and below ground within a seven year timeframe.	Clearing of approximately 46.5 ha within a development envelope of 363 ha, mining above and below ground within a seven year timeframe.
Mine Pit (Hillsborough Pit)		
Mine Pit (Harbour View Pit)		
Mine Pit (Flag Pit)		
Waste Rock Landform	Clearing of approximately 75 ha within a development envelope of 366 ha.	Clearing of approximately 40 ha within a development envelope of 363 ha.
Haul Road	Clearing of approximately 16 ha within a development envelope of 366 ha	Clearing of approximately 13 ha within a development envelope of 363 ha.
Tailings Storage Facility	Clearing of approximately 39 ha within a development envelope of 366 ha.	Clearing of approximately 22 ha within a development envelope of 363 ha.
Water Pipeline and Corridor	Clearing of approximately 4 ha within a development envelope of 366 ha.	Clearing of approximately 14 ha within a development envelope of 363 ha.
Ancillary Support Infrastructure	Clearing of approximately 51 ha within a development envelope of 366 ha.	Clearing of approximately 16.5 ha within a development envelope of 363 ha.
<i>Physical elements Myamba Mine Site</i>		
Mine Pit (Trilogy Pit)	Approximately 7 ha of previously cleared land within a development envelope of 150 ha.	Approximately 7 ha of previously cleared land within a development envelope of 149 ha.
Waste Rock Landform	Approximately 15 ha of previously cleared land within a development envelope of 150 ha.	Approximately 4.4 ha of previously cleared land within a development envelope of 149 ha.
Haul Road	Approximately 6 ha of previously cleared land within a development envelope of 150 ha.	Approximately 5.9 ha of previously cleared land within a development envelope of 149 ha.
Ancillary Support Infrastructure	Approximately 29 ha of previously cleared land within a development envelope of 150 ha.	Approximately 28 ha of previously cleared land within a development envelope of 149 ha.

* A new table will be developed to align the changed proposal description with Instruction: Key Proposal Characteristics. The table above is derived from the proponent's section 43A request and has been used to illustrate the changes as compared to the proposal as described in the referral documentation. As such this table will be subject to change during the assessment.