

Environmental Protection Act 1986

Section 43A

**NOTICE OF DECISION TO CONSENT TO CHANGE TO PROPOSAL DURING
ASSESSMENT**

PERSON TO WHOM THIS NOTICE IS GIVEN

ACH Minerals Pty Ltd (ACN: 609 225 023)
PO Box 470
WEST PERTH WA 6872

PROPOSAL TO WHICH THIS NOTICE RELATES:

Ravensthorpe Gold Revised Project
Assessment No. 2117

Pursuant to section 43A of the *Environmental Protection Act 1986* (EP Act), the Environmental Protection Authority (EPA) consents to the proponent making the following changes to the proposal during assessment without a revised proposal being referred:

- *decrease of the development envelope from 512 hectares (ha) to 428.4 ha at the Kundip mine site;*
- *increase of the disturbance footprint from 197 ha to 244.7 ha at the Kundip mine site;*
- *removal of the development envelope (149 ha) and disturbance footprint (45.2 ha) at the Myamba mine site;*
- *increase of clearing for the tailing storage facility by 5.2ha and volume by 0.5 million cubic metres; and*
- *correction of groundwater abstraction (error) and increase to 0.8 GL per annum.*

The revised development envelope is shown in Figure 1, and revised disturbance footprint is shown in Figure 2 attached.

EFFECT OF THIS NOTICE:

1. The proponent may change the proposal as provided for in this notice.

RIGHTS OF APPEAL:

There are no rights of appeal under the EP Act in respect of this decision.



Dr Tom Hatton
Delegate of the Environmental Protection Authority
CHAIRMAN

19 October 2018

Figure 1 – Development envelope of original and changed proposal

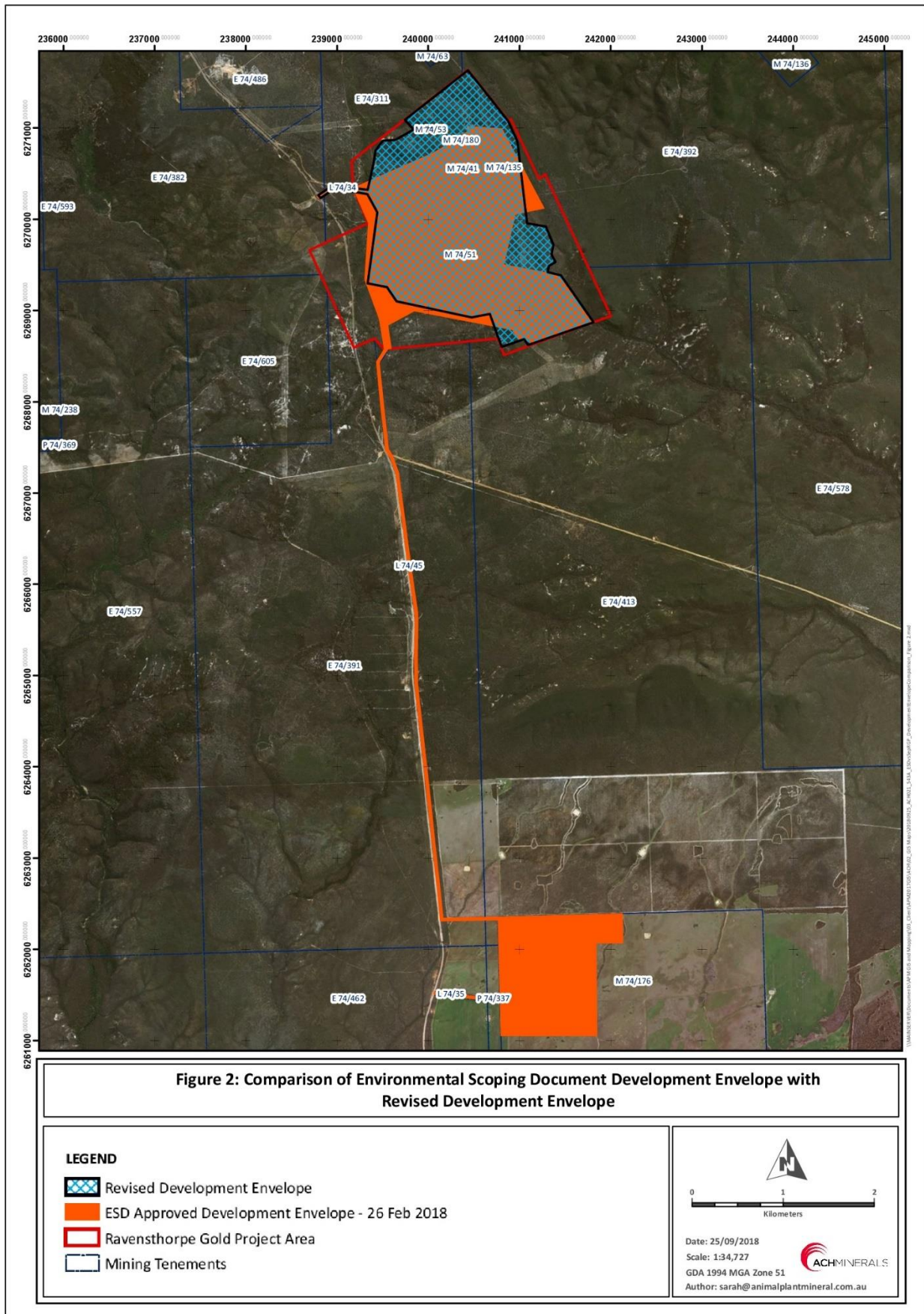
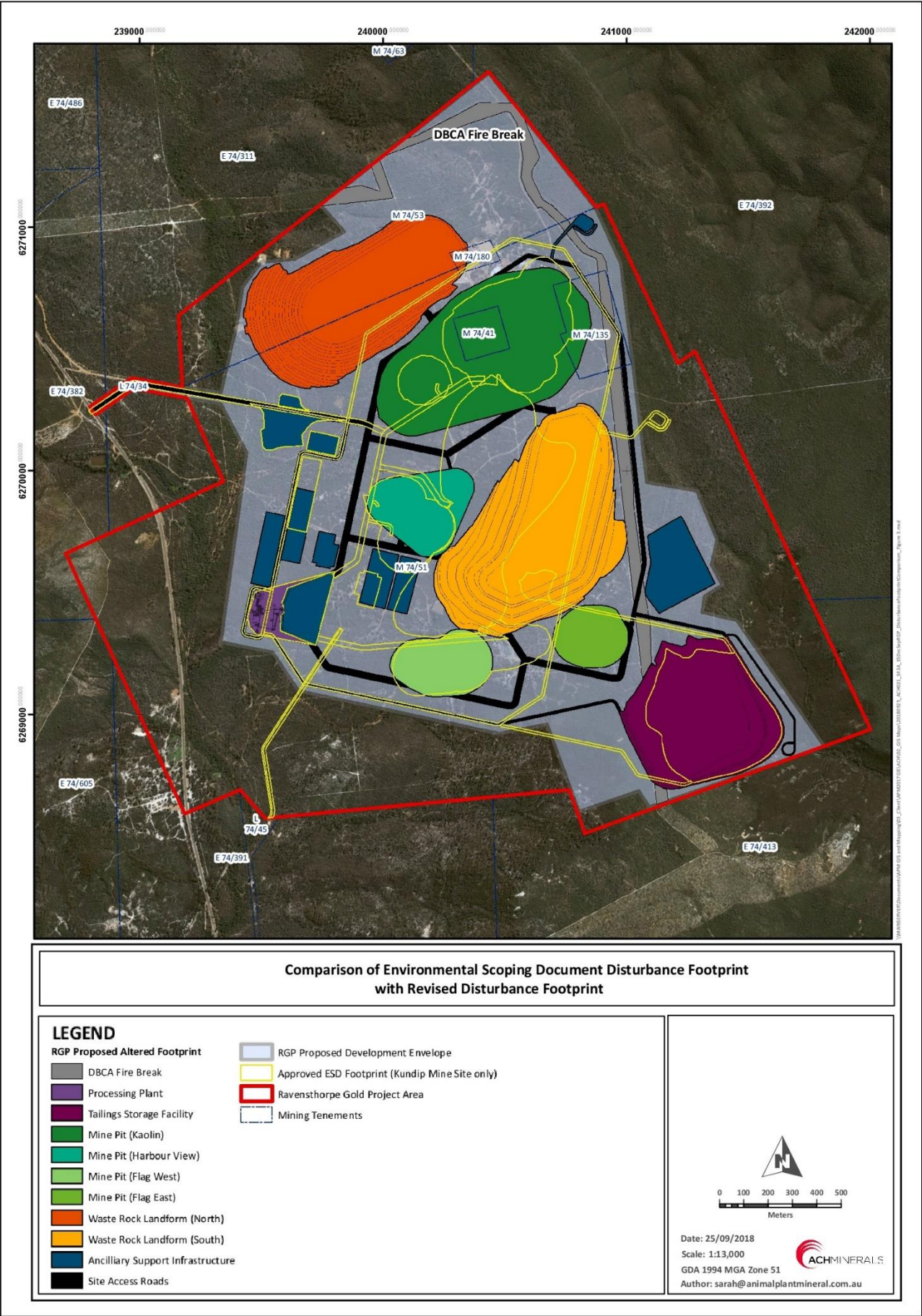


Figure 2 – Disturbance footprint of original and changed proposal



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 (MS 716).

The proposal includes mining and processing of 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 involves mining via open pits and underground, two Waste Rock Landforms (WRL), 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 prepared an Environmental Scoping Document (ESD) for the proposal, which was approved by the EPA on 26 February 2018. The Environmental Review Document (ERD) that is required as part of the PER process is still within the drafting stage, and not yet approved by the EPA for public review.

In advance of the EPA preparing a report on the outcome of its assessment of the proposal, the proponent (ACH) has sought the EPA's consent to change the proposal.

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 the proponent 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 17 August 2018; and
4. relevant EPA policy and guidance documents.

Consideration

1. Nature of the proposed change

The proposed change consists of:

- decrease of the development envelope from 512 hectares (ha) to 428.4 ha at the Kundip mine site;
- increase of the disturbance footprint from 197 ha to 244.7 ha at the Kundip mine site;
- removal of the development envelope (149 ha) and disturbance footprint (45.2 ha) at the Myamba mine site;
- increase of clearing for the tailing storage facility by 5.2ha and volume by 0.5 million cubic metres; and
- correction of groundwater abstraction (error) and increase to 0.8 GL per annum.

The proponent advised that it no longer intends on pursuing development of the Myamba Mine Site and water corridor pipeline (Figure 1). The proposed changes are to remove those areas from the development envelope and expand the Kundip Mine Site to accommodate the following:

- optimisation of the mine pits, including the absorption of the Hillsborough pit into Kaolin;
- relocation of the WRL initially proposed at Myamba Mine Site to Kundip Mine Site;
- repositioning of key physical elements including the WRL's, mine pits and ancillary infrastructure;
- an increase in TSF footprint to accommodate the increase in total volume from pit optimisation;

- additional ancillary infrastructure including a water storage facility, topsoil stockpiles and access tracks; and
- an increase in the life of mine from 7 years to 8 years.

The proponent provided reasoning as to why the Myamba Mine Site would no longer be developed as part of this proposal, noting that the minerology associated with the site would present unnecessary complex and technical risk.

As a result of removing Myamba Mine Site from the proposal, the use of Hopetoun-Ravensthorpe Road for transport of ore between sites would no longer be required. The water corridor pipeline that was proposed to sit adjacent to the Kundip Nature Reserve, would also no longer be required.

The change to the disturbance footprint at Kundip Mine Site would include minor additional impacts to the total disturbance of the *Proteaceae Dominated Kwongan Shrublands of the Southeast Coastal Floristic Province of WA* Threatened Ecological Community (TEC), and the *Melaleuca sp. Kundip (now M. sophisma)* Heath Priority 1 Ecological Community (PEC). Given the proposal is currently likely to impact on these communities, the additional disturbance is unlikely to result in a significantly different impact to the currently assessed proposal.

ACH notes that the original Philips River Gold Project conditioned under MS 716 was authorised to abstract up to 670 ML per annum. The ESD, as approved, contained an error in which the proposed operational extent of groundwater abstraction was recorded as 40 ML per annum. The section 43A change accounts for the correction of the groundwater abstraction volume to align with MS 716, and an additional 130 ML per annum required to accommodate water supply for additional operational requirements.

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. On the 14 December 2017, ACH requested the following change to proposal:

- decrease the development envelope from 516 ha to 512 ha; and
- decrease the total disturbance footprint of both the Kundip and Myamba Mine Sites from 316 ha to 197 ha.

The EPA approved the above changes under section 43A of the EP Act on 17 January 2018.

The ESD was approved by the EPA on 26 February 2018. On the 26 September 2018, ACH submitted a further request to change the proposal under section 43A (this request). The ERD is still in draft and will be updated to include the requested changes before approval by the EPA for public review.

The EPA notes that the approved ESD is still relevant to the changed proposal, and no amendments to the document are required or proposed to facilitate the section 43A request.

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 changes occur in the same area in which ACH's environmental investigations are being undertaken as part of the PER process. ACH has provided the EPA with new spatial data that supports the request to change the proposal.

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 being assessed at the level of 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; and
- Inland Waters (formerly 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 EPA notes that the change to remove Myamba Mine Site and water corridor pipeline from the development envelope would decrease the disturbance footprint of the proposal.

The EPA notes that the change would slightly increase impacts to the TEC and PEC, but would not result in an increased significance of impact in the context of the entire proposal.

The EPA notes that the duration of the proposal would be extended by one year, however this is unlikely to significantly change the impacts from the current proposal.

The EPA considers that the changed proposal is unlikely to have a significant environmental impact that is different from the original proposal. The significance of the potential environmental impact of the proposal will be considered by the EPA during the assessment process.

c) Consequence of the likely impacts (or change)

The EPA considers the consequence of likely impacts remains unchanged from the original 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 EPA considers any potential cumulative impacts of the changed proposal will be assessed during the PER process, including cumulative impacts from emissions.

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. A holistic assessment of the changed proposal will be undertaken during the EPA's assessment of the 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.

The EPA also notes that members of the public will be provided an opportunity to review the proposal within the four week public review. The public review period will commence on finalisation of the proponent's Environmental Review Document (ERD).

Schedule 1

Change to Proposal*

Table 1: Summary of Proposal

Proposal Title	Ravensthorpe Gold Revised Project
Proponent Name	ACH Minerals Pty Ltd
Short Description	<p>The proposal is to revise the Philips River Gold Proposal, located approximately 17 km south-east of Ravensthorpe in the Shire of Ravensthorpe.</p> <p>The proposal involves the development and operation of a gold and copper mine at Kundip Mine Site. The proposal includes mining from multiple open-cut pits and underground, a processing facility, waste rock landforms, a tailings storage facility and associated infrastructure.</p>

Table 2: Location and Proposed Extent of Physical Characteristics

Element	Current Proposal	Changed Proposal (section 43A)
<i>Physical elements Kundip Mine Site</i>		
Mine Pit (Kaolin Pit)	Clearing of up to 46.3 ha of native vegetation within a development envelope of 512 ha, mining over a 7 year timeframe.	Clearing of up to 44.2 ha of native Vegetation, and up to 22.5 ha of previously cleared land within a development envelope of 428.4 ha , mining over an 8 year timeframe.
Mine Pit (Harbour View Pit)		
Mine Pit (Flag Pit)		
Mine Pit (Hillsborough Pit)		Element removed.
Waste Rock Landform (North)		Clearing of up to 37.1 ha of native vegetation, and up to 2.3 ha of previously cleared land within a development envelope of 428.4 ha.
Waste Rock Landform (South)	Clearing of up to 40.1 ha of native vegetation within a development envelope of 512 ha.	Clearing of up to 45.5 ha of native vegetation, and up to 1.2 ha of previously cleared land within a development envelope of 428.4 ha .
Tailings Storage Facility	Clearing of up to 21.9 ha of native vegetation within a development envelope of 512 ha.	Clearing of up to 26.7 ha of native vegetation, and up to 2.6 ha of previously cleared land within a development envelope of 428.4 ha .
Site Access Road	Clearing of up to 2.5 ha of native vegetation within a development envelope of 512 ha	Clearing of up to 16 ha of native vegetation, and up to 2.3 ha of previously cleared land within a development envelope of 428.4 ha .
Water Pipeline Corridor	Clearing of up to 4.7 ha of native vegetation within a development envelope of 512 ha	Element removed.
Ancillary Support Infrastructure	Clearing of up to 36.3 ha of native vegetation within a development envelope of 512 ha	Clearing of up to 26 ha of native vegetation, and up to 16 ha of previously cleared land within a development envelope of 428.4 ha .

Physical elements Myamba Mine Site		
Mine Pit (Trilogy Pit)	No more than 7 ha of previously cleared land within a development envelope of 512 ha, mining over a 2 year timeframe. No additional clearing required.	Element removed.
Waste Rock Landform	No more than 4.4 ha of previously cleared land within a development envelope of 512 ha. No additional clearing required.	Element removed.
Site Access Road	No more than 2.7 ha of previously cleared land within a development envelope of 512 ha. No additional clearing required	Element removed.
Ancillary Support Infrastructure	No more than 31.1 ha of previously cleared land within a development envelope of 512 ha. No additional clearing required.	Element removed.

Table 3: Location and Proposed Extent of Operational Elements

Element	Current Proposal	Changed Proposal (section 43A)
Operational Elements		
Pit Dewatering	Up to 60 ML per annum of combined water abstraction.	Up to 0.8 gigalitre per annum of combined water abstraction.
Waste Rock	Up to 15.3 Mt of waste rock to be generated over the life of mine.	Up to 29.4 Mt of waste rock to be generated over the life of mine.
Tailings Storage	1500 ML tailings to be deposited throughout the Life of mine.	2000 ML tailings to be deposited throughout the Life of mine.
Power Supply	Supplied via the Hopetoun power grid and diesel generators.	Up to 6 Megawatt diesel generator power plant.
Transport	60 tonne capacity semitrailers generating approximately 20 truck movements per month to Esperance Port or Perth. 12 truck movements per day between sites, via the Ravensthorpe Hopetoun Road.	60 tonne capacity semi-trailers generating approximately 20 truck movements per month to Fremantle Port .

* 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.

Figure 1 - Development envelope of original and changed proposal

