

SUMMARY OF SUBMISSIONS

PA23/371 – L63, 1265 Hopeland Road, Keysbrook 1265 - Extension of Time and Amendment to Approved Extractive Industry

Submitter	No	Submitter Comments	Applicant Comment	Officer Recommendation
Department of Water and Environmental Regulation (DWER)	A.	<p>The Department has identified that the development application has the potential to impact on environment and water resource values and management. While the Department does not object to the proposal key issues and recommendations are provided below, and these matters should be addressed.</p> <p>Issue</p> <p>Native Vegetation</p> <p>Advice</p> <p>Under section 51C of the Environmental Protection Act 1986 (EP Act), clearing of native vegetation is an offence unless:</p> <ul style="list-style-type: none"> • it is undertaken under the authority of a clearing permit • it is done after the person has received notice under Section 51DA(5) that a clearing permit is not required • the clearing is subject to an exemption <p>Exemptions for clearing that are a requirement of written law, or authorised under certain statutory processes, are contained in Schedule 6 of the EP Act. Exemptions for low impact routine land management practices outside of environmentally sensitive areas (ESAs) are contained in the Environmental Protection (Clearing of Native Vegetation) Regulations 2004 (the Clearing Regulations).</p> <p>It is understood that the proponent has submitted a s45C application under Part IV of the EP Act to amend Ministerial Statement 810 to include the area subject to this proposal. Should this amendment to Ministerial Statement 810 be granted, any clearing required for this proposal in accordance with the implementation agreement or decision is likely to be exempt from requiring a clearing permit under Schedule 6, Clause 2 of the EP Act.</p>	<p>Noted</p> <p>KLPL have submitted a request under Section 45C of the EP Act for amendment of MS810 to include an additional mining area within Lot 63. As part of this request no mapped vegetation clearing is required.</p> <p>It was however noted in the S45C application that up to 0.13ha of miscellaneous isolated scattered shrubs/trees were included in the mapped pasture.</p> <p>KLPL have committed to revegetating the miscellaneous clearing of 0.13ha at the rate of 1:1.4ha, in accordance with MS810 Condition 8 – Revegetation Management Plan.</p>	

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		<p>If further clarification is required, please contact the Department’s Native Vegetation Regulation section by email (admin.nvp@dwer.wa.gov.au) or by telephone (6364 7098).</p> <p>Issue</p> <p>Industrial Regulation</p> <p>Advice</p> <p>The Department of Water and Environmental Regulation (DWER) regulates emissions and discharges from the construction and operation of prescribed premises through a works approval and licensing process, under Part V, Division 3 of the Environmental Protection Act 1986 (EP Act).</p> <p>The categories of prescribed premises are outlined in Schedule 1 of the Environmental Protection Regulations 1987.</p> <p>The EP Act requires a works approval to be obtained before constructing a prescribed premises and makes it an offence to cause an emission or discharge from an existing prescribed premises unless they are the holder of a works approval or licence (or registration) and the emission is in accordance with any conditions to which the licence or works approval is subject.</p> <p>The provided development application request was reviewed in relation to works approval and licence requirements under Part V Division 3 of the EP Act.</p> <p>The proposed operation is categorised as a Prescribed Premises under Schedule 1 of the Environmental Protection Regulations 1987 for the following categories:</p> <table border="1" data-bbox="521 1283 1357 1418"> <thead> <tr> <th data-bbox="521 1283 900 1418">Category</th> <th data-bbox="900 1283 1167 1418">Category Description</th> <th data-bbox="1167 1283 1357 1418">Production or design capacity</th> </tr> </thead> <tbody> <tr> <td> </td> <td> </td> <td> </td> </tr> </tbody> </table>	Category	Category Description	Production or design capacity				<p>DWER advice noted.</p> <p>No additional dewatering infrastructure is required for the additional mine area within Lot 63. Dewatering infrastructure on existing approved mine areas will be utilised.</p> <p>KLPL confirms that no change to the existing Category 6 and 8 assessed production capacities listed on licence L8918/2015/1 are proposed and as such no Works Approval or Licence amendments are required.</p>	
Category	Category Description	Production or design capacity								

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		<table border="1"> <tr> <td data-bbox="519 330 900 632">6</td> <td data-bbox="900 330 1167 632">Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore.</td> <td data-bbox="1167 330 1359 632">250,000 tonnes per annual period</td> </tr> <tr> <td data-bbox="519 632 900 1003">8</td> <td data-bbox="900 632 1167 1003">Mineral sands mining or processing: premises on which mineral sands ore is mined, screened, separated or otherwise processed.</td> <td data-bbox="1167 632 1359 1003">5,250,000 tonnes per annual period</td> </tr> </table> <p data-bbox="519 1023 1498 1222">The purpose of a licence is to allow DWER to assess the environmental acceptability of a proposal's potential to cause emissions and discharges during operation. Note that any licence issued under Part V of the EP Act will only regulate emissions associated with the dewatering or mineral sands processing. It does not extend to the environmental impacts of extracting the material from the ground or transport of material off-site.</p> <p data-bbox="519 1241 1498 1342">The operations will need to demonstrate compliance with the Environmental Protection (Noise) Regulations 1997 and Environmental Protection (Unauthorised Discharges) Regulations 2004.</p> <p data-bbox="519 1361 1498 1422">Any proposed expansion or changes to the existing facility may trigger provisions of section 53 of the Environmental Protection Act 1986 and can</p>	6	Mine dewatering: premises on which water is extracted and discharged into the environment to allow mining of ore.	250,000 tonnes per annual period	8	Mineral sands mining or processing: premises on which mineral sands ore is mined, screened, separated or otherwise processed.	5,250,000 tonnes per annual period		
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		<p>be authorised through a works approval or licence amendment. The Department will retain discretion on whether a works approval or licence amendment application is appropriate – further guidance on changes to prescribed premises can be found in DWER’s Industry Regulation Guide to Licensing which can be accessed at: https://www.der.wa.gov.au/our-work/licences-and-works-approvals/540-guideline-industry-regulation-guide-to-licensing .</p> <p>This premises is licensed under Part V of the Environmental Protection Act 1986 (EP Act) (licence number L8918/2015/1) as a Category 6 mine dewatering and Category 8 mineral sands processing prescribed premises. The Licence Holder is Keysbrook Leucoxene Pty Ltd.</p> <p>The current licence commenced on 19 November 2015 and has since been amended four times. These amendments were:</p> <ul style="list-style-type: none"> • November 2016 – amendment to consolidate an amendment notice which involved upgrades to the WCP to include additional spiral circuit. • January 2020 – amendment to expand the premises boundary to align with the approved mining area under MS 810, and other administrative changes. • April 2020 – amendment to increase water discharge limit to 250,000 tonnes per year. • May 2023 – Department initiated amendment to realign the annual fee period and to extend expiry date. <p>The key emissions considered during the assessment of the premises were dust, noise, tailings leachate, contaminated stormwater and process water. The primary sensitive receptor considered during assessments were the emissions to cause flooding, erosion and contamination to nearby surface water receptors such as Balgobin Brook Sth and Nambelup Brook Nth.</p>		

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		<p>IR's understanding of the amendment to the Development Approval are for the changes below:</p> <p>(1) Extended duration of Life of Mine by an additional 1.5 years; and</p> <p>(2) Extension to the mine area (within Lot 63) – additional 143.2ha currently being assessed by EPA.</p> <p>IR's advice regarding the amendments:</p> <p>(1)The Part V licence L8918/2015/1 has recently been amended to extend the duration of the licence until 22 November 2043. No amendments to Part V licence are therefore required in relation to this aspect.</p> <p>(2)The prescribed premises boundary delineated under L8918/2015/1 encompasses Lot 63 and would not require amending to accommodate the proposed mine expansion area within Lot 63, following approval under Part IV of the EP Act. However, IR notes that during excavation of the mineral sands, some pits will be excavated below the water table and will require dewatering of the pit. Therefore, a licence amendment is likely to be required if additional dewatering infrastructure (pipelines etc.) is to be constructed and operated in the expansion area.</p> <p>IR further notes that no changes to the existing Category 6 and 8 assessed production capacities listed on licence L8918/2015/1 are proposed in the Development Approval.</p> <p>Please note that this advice is provided based on information provided. Applicants are encouraged to contact DWER at the above contact details to clarify requirements based on the proposed changes to the development proposal.</p> <p>Any future changes to the licence will require an amendment application to be submitted by the Licence Holder. The application forms and future information is available at http://www.der.wa.gov.au/our-work/licences-and-</p>	<p>DWER advice noted.</p> <p>KLPL will continue to implement the existing Water Management Plan as required by MS810 Condition 11.</p>	

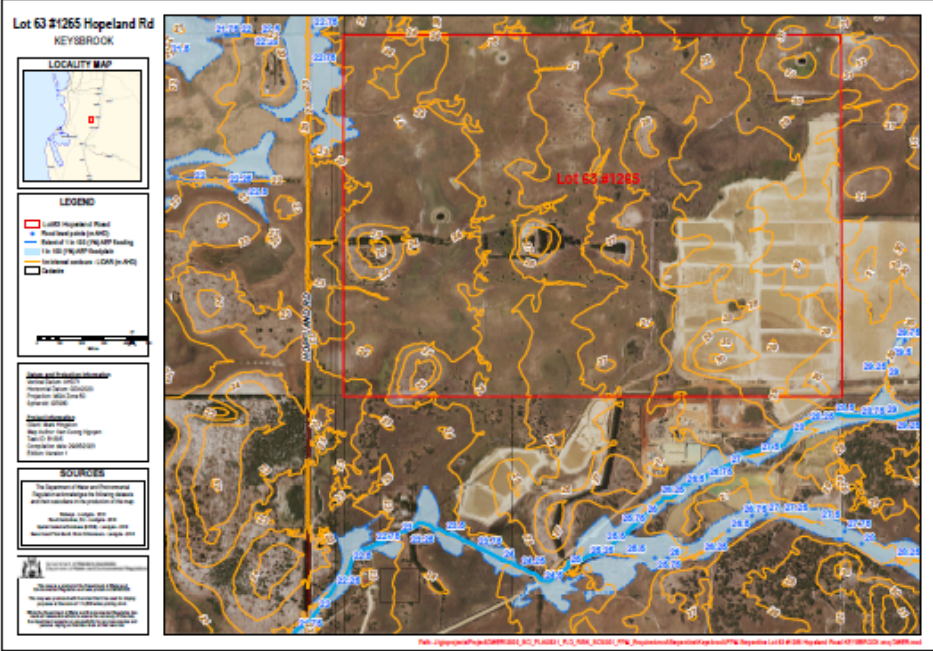
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		<p>works-approvals and / or if there are queries relating to this Licence, to contact DWER at info@dwer.wa.gov.au or 6364 7000.</p> <p>Issue</p> <p>Floodplain Management</p> <p>Advice</p> <p>The Department of Water and Environmental Regulation provides advice and recommends guidelines for development on floodplains with the object of minimising flood risk and damage.</p> <p>The Murray Drainage and Water Management Plan and Associated Studies show that the Lot is possibly affected by flooding during major flows, with the 1 in 100 (1%) AEP flood level expected vary as shown on the attached map.</p> <p>Based on our recommended floodplain management strategy for the area, we have no objection to the proposal with regard to major flooding.</p> <p>It should be noted that this advice is related to major flooding only and other planning issues, such as local stormwater drainage, environmental and ecological considerations, may also need to be addressed.</p>	<p>DWER advice noted.</p> <p>A Groundwater Abstraction licence has been applied for under the RIWI Act.</p> <p>An ASS Investigation report was submitted to the EPA as part of the 45C approvals for Lot 63. In addition, a targeted ASS investigation was conducted by Doral within Lot 63 in May 2023. The results of the ASS investigation were very similar to the results from previous ASS investigations conducted</p>	

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		 <p>Issue</p> <p>Groundwater Licence</p> <p>Advice</p> <p>The subject lot is located within the Serpentine Groundwater Area (Keysbrook 1 sub area) which is proclaimed under the Rights in Water and Irrigation Act 1914. Any groundwater abstraction in this proclaimed area for purposes other than domestic and/or stock watering taken from the superficial aquifer, would be subject to licencing by the Department.</p> <p>There are no current licences for dewatering for Lot 63 Hopeland Road, Keysbrook. The Department’s Licencing Branch has received an application</p>	<p>in 2005 and 2007 for the original Keysbrook Project and in 2021 for the Lot 56 amendment area, with only minor levels of actual acidity being detected within the soil profile, generally below the level of mining (therefore not disturbed).</p> <p>Mining methods for the proposed amendment will be the same as for the existing areas of the Sites, comprising dry mining in the shallow Bassendean formation to an average depth of ~1-2mbgl, with minor dewatering required during winter periods.</p> <p>Given the targeted ASS investigation for the proposed amendment area has identified similar low risk results to previous ASS investigation across the Site, it is considered appropriate that the existing ASSMP required</p>	

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		<p>for dewatering and it is currently under assessment, however the application is only for the previously mined area on Lot 63. If the applicant requires a dewatering licence over the whole of Lot 63 then the applicant should contact the Department's Licencing Branch at the Mandurah office on 9550 4222.</p> <p>Issue</p> <p>Contaminated Sites</p> <p>Advice</p> <p>Acid Sulfate Soils (ASS) risk mapping indicates that the site is located within an area identified as representing a low to moderate risk of ASS occurring within 3 metres of the natural soil surface. Please refer to Department of Water and Environmental Regulation's acid sulfate soil guidelines for information to assist with the management of ground and/or groundwater disturbing works. https://www.der.wa.gov.au/your-environment/acid-sulfate-soils/69-acidsulfatesoils-guidelines</p> <p>In the event that the applicant determines that a works approval or licence application is required under Part V of the Environmental Protection Act 1986 (EP Act), the advice provided in this communication does not prejudice and must not be considered to infer the outcome of the EP Act licence and works approval process.</p> <p>Where the Department has a statutory role, planning applications should be considered prior to the Department issuing any relevant permits, licenses and/or approvals.</p>	<p>under MS810 Condition 12 is continued to be applied for the Western Extension and is sufficient to manage any minor occurrences of acidity at the Site.</p> <p>Currently material samples are collected weekly from the mine pit and tailings areas for analysis of acid generating risk. Data indicates no significant acid generating material has been encountered in mining to date. This is consistent with the low to moderate risk identified during all ASS investigations, orebody geology and the limited depth of mining, which is confined to the upper, weathered part of the sand profile</p>	
DMIRS	B.	The Department of Mines, Industry Regulation and Safety (DMIRS) has determined that this proposal raises no significant issues with respect to mineral and petroleum resources, geothermal energy, and basic raw materials.	Noted	Noted

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		DMIRS lodges no objections to the above extension of time and amendment.		
DBCA	C.	<p>In reference to your correspondence dated 23 May 2023, the Parks and Wildlife Service at the Department of Biodiversity, Conservation and Attractions (DBCA) provides the following comments.</p> <p>It is DBCA's expectation that the proposal will comply with the requirements of Ministerial Statement's 810 and 1089, the subsequent 46c and 45c Environmental Protection (EP) Act approvals, the Part V of the EP Act Environmental Licences, and that any additional mining areas will be subject to EPA assessment and advice.</p>		Noted
A5310	1.	<p>The continuing of the extraction timeframe & area of extraction for the development of mineral sands in Hopeland Rd, Keysbrook presents the following ongoing discomforts & problems for those living in the area as mining moves closer to residents.</p> <p>The noise from the mine is constant and often loud especially at night making sleeping difficult at times. As the mining will be moving closer this will be ongoing for many years to come.</p> <p>Dust created from the mining is already a problem often quite thick in Summer made worse by the strong east winds. This makes the air we breathe detrimental for the health of us and our children and the layers of dust throughout the house is an ongoing problem.</p> <p>There is evidence that the water table has dropped in the local area since the commencement of mining. Many farms in the area depend on a constant water supply for stock and with wells not having the same water capacity that they have had for many previous years this create a huge problem in animal welfare.</p> <p>Farmers and residents of the area have for years left areas of natural bush which has become feeding and breeding sites for unique local wildlife</p>	<p>Noise.</p> <p>Mining the Lot 63 amendment area is proposed to occur over ~18 months and will continue as day time mining only, with mineral processing occurring 24 hours, 7 days per week.</p> <p>Noise management will continue to be applied in accordance with MS1089 Condition 14-1 and 14-2, which requires the use of amenity agreements for any noise sensitive premise within 2km of the mining operations.</p>	As discussed in the main report the proposal would comply with the Noise Regulations and as such it is considered that the proposal would not result in adverse amenity impacts by way of noise.

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		<p>including Phascogales, Sugar gliders, Wallabies, Bandicoots and many nesting birds including Wedge Tail.</p> <p>Eagles, Hawks, Owls and the Red & White Tailed Black Cockatoos. No amount of rehabilitation makes up for the complete clearing of an area as trees take many years to grow and many species will be lost for ever.</p>	<p>KLPL currently has amenity agreements in place for all neighbours within the 2km arc of the proposed disturbance with the exception of one confirmed as an unoccupied residence and another near to the 2km boundary which is in negotiation. KLPL intends to continue to have amenity agreements in place with all affected residences throughout the mining of the amendment area.</p> <p>Noise modelling results for the proposed Lot 63 amendment area demonstrate that mining, tails and rehabilitation activities can be undertaken within while maintaining compliance with the project noise limits for all receivers with amenity agreements within the 2km buffer zone surrounding the mining operations (Wood, 2023). Compliance was</p>	

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			<p>demonstrated assuming implementation of the following noise mitigation measures:</p> <ul style="list-style-type: none"> • Noise bunds at mobile screening plants oriented to attenuate sound propagation towards the nearest affected receptors. • Noise barriers at field pumps oriented to attenuate sound propagation towards the nearest affected receptors. <p>No specific noise management measures are required for mobile equipment, other than not exceeding the sound power levels and numbers of equipment items operating simultaneously assumed in the modelling scenarios.</p> <p>Predicted noise levels do not exceed the Assigned Levels at any receptors</p>	

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			<p>beyond the 2km buffer zone surrounding the mining operations.</p> <p>Mineral processing can be undertaken at all times; however, mining operations have been restricted to weekdays (Monday to Saturday 0700 to 1900hrs, excluding public holidays).</p> <p>Dust</p> <p>In relation to Dust impacts, the EPA considered that the Project could be managed, on the basis that:</p> <ul style="list-style-type: none"> • Mining occurs rapidly over the Project area (i.e., proximal receptors are exposed to a dust risk for a relatively short period of time) • Agreement is reached with landowners when mining in close 	<p>As discussed in the main report and based on the information provided, Officers consider that dust can be appropriately managed. The Ministerial Approval sets out the requirement to fully implement the management and monitoring measures.</p>

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			<p>proximity to their residence;</p> <ul style="list-style-type: none"> • An Air Quality and Dust Management Plan is implemented. <p>In accordance with the approved Air Quality and Dust Management Plan (MS810 Condition 15), dust monitoring (PM10 and total suspended particulates) is undertaken around the perimeter of the mining area and levels transmitted in real time to a website enabling immediate review in high-risk periods. A program of dust mitigation is ongoing and particularly focussed on preparation for the seasonal strong easterly winds in the summer and autumn months. Key controls include;</p> <ul style="list-style-type: none"> • Progressive backfill and rehabilitation activities, 	

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			<ul style="list-style-type: none"> • Minimisation of open ground and stockpile areas, • Utilisation of water carts to dampen active mining areas, • Utilisation of water carts adapted to distribute wet clay fines to provide a clay sealant for open areas and stockpiles, and • Stabilisation of backfilled mine voids by sowing an intermediate cover crop of ryegrass and oats to create a ground cover prior to topsoil replacement. <p><u>Groundwater</u></p> <p>Mining of the Keysbrook Mine commenced in 2015.</p> <p>The current Water Management Plan (MBS Environmental, 2015) (MS810 Condition 11), defines the approach to be adopted for</p>	<p>As discussed in the main report monitoring and management measures to prevent adverse impacts to local groundwater and surface water should be ongoing to ensure that adjoining sensitive receptors who also</p>

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			<p>management of groundwater and surface water. Additionally, the Groundwater Licence Operating Strategy (GLOS) (Doral, 2020) defines details of the groundwater monitoring program (i.e., abstraction quantities, water levels and water quality), trigger levels and contingency actions to mitigate potential impacts caused by the Keysbrook mining operations and also to ensure the actual impacts are not greater than predicted.</p> <p>A summary of the most recent 2021 Annual Groundwater Monitoring Summary (Groundwater Resource Management, 2021) are as follows:</p> <ul style="list-style-type: none"> • Totals of around 350,000kL (i.e. 11L/s) was recorded as being abstracted from the Superficial aquifer due to mining of the 	<p>draw groundwater from the same aquifer are not adversely impacted upon. This is associated with Condition 11 of the Ministerial Approval which requires monthly monitoring of water levels and quarterly monitoring of the water quality to mitigate potential impacts caused by the mining operations and also to ensure the actual impacts are not greater than predicted.</p>

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			<p>Bassendean Sand in 2021;</p> <ul style="list-style-type: none"> Dewatering was done via in-pit sumps only during a two-month period (i.e. January to February 2021), which included recycled water recovered from tailings backfill; <p>It is understood that for most of the year mining was carried out above the water table, consequently groundwater seepage into the pits was minimal;</p> <ul style="list-style-type: none"> The groundwater level in the Superficial Aquifer continues to demonstrate a cyclical seasonal variability (between 0.4 to 3.6m, averaging 1.8m), forming a peak around August and September each year following winter rainfall and a trough around March-April at the end of the dry season. The pattern of seasonal variability in 	

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			<p>the Superficial aquifer indicates active rainfall recharge;</p> <ul style="list-style-type: none"> • The groundwater level contours for the Superficial aquifer during December 2015 and December 2021 shows a groundwater flow direction towards the west (as in the pre-mining period) and the data does not indicate any impacts to the Superficial aquifer associated with pit dewatering and tailings discharge, apart from within the immediate mining areas; • In the five years of abstraction to date there has been no evidence of impact on groundwater availability to surrounding users (Groundwater Resource Management, 2021); 	

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			<p>Groundwater modelling and impact assessment for lot 63 (AQ2 2023, Section 5.5.2) was undertaken and summarised as “minimal localised changes in the immediate area of the active mining (pits) and that these would be temporary and relatively small. There will be a negligible regional scale groundwater impact to the Superficial aquifer”.</p> <p>Clearing.</p> <p>No clearing of native vegetation is proposed for the additional mine area within Lot 63. It is noted that a very minor area (0.13ha) of misc vegetation (present as isolated scattered shrubs/trees) will be cleared and rehabilitated in accordance with MS810 Condition 8 – Rehabilitation Management Plan.</p>	<p>As discussed in the main report the Department of Water and Environmental Regulation (DWER) consider the proposal likely to be exempt from requiring a clearing permit under Schedule 6, Clause 2 of the EP Act</p>

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			No impacts to Black-Cockatoo habitat will occur as a result of implementing the proposed amendment area.	As discussed in the main report the remnant vegetation areas in the proposed mine area are predominantly mature trees which do not contain foraging and/or breeding habitat for the protected Black Cockatoo.
A399104	2.	<p>We are strongly opposed to the proposed above amendment:</p> <p>Our property is approximately 500m outside the notification zone of the proposed amendment and extension. Noise and dust don't stop at 2km.</p> <p>Noise:</p> <p>We have been negatively impacted by the low level noise from the loaders that continue all night. Although the noise is not loud it is a continuous low humming sound that has often meant either moving to another room to sleep or always having windows closed which in summer is not ideal. If the mine amendment/extension is approved this noise will be closer and louder.</p>	<p>Noise</p> <p>Mining the Lot 63 amendment area is proposed to occur over ~18 months and will continue as day time mining only, with mineral processing occurring 24 hours, 7 days per week.</p> <p>Noise management will continue to be applied in accordance with MS1089 Condition 14-1 and 14-2, which requires the use of amenity agreements for any noise sensitive premise within 2km of the mining operations.</p>	As discussed in the main report the proposal would comply with the Noise Regulations and as such it is considered that the proposal would not result in adverse amenity impacts by way of noise.

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		<p>Dust</p> <p>The dust from the mine as it is now, extends to our property especially in summer with the high easterly winds. If the amendment is approved the dust will be a bigger problem.</p> <p>Water:</p> <p>When the mineral sands mine started operation there was an immediate reduction of the water table. We have had Dept of Water test bores installed since 2010 with recorded data showing this.</p> <p>Our conservation covenanted wetland was not inundated with water that year and in many winters since. This has never happened before according to all the historical records we have, not even in the 2010/11 drought years. The wetland is now mostly only reliant on surface water rainfall and is now usually dry by early summer even after the 2020 wet winter. Historically this wetland has remained with some surface water until March.</p> <p>I understand that the mine is not the only high groundwater use business in the area and also I understand that the area is subject to a drying climate, however I believe it has contributed heavily to the lowering of the water table.</p> <p>Apparently the SJ Shire/DWER are not releasing any new bore licences and existing bore owners are now being required to buy and install water meters. With this in mind I find it hypocritical that the mine be approved for another two years to continue to take enormous amounts of groundwater, from any aquifer.</p> <p>Clearing:</p> <p>Although much of the mineral sands mine has been on previously cleared farm land, many large old trees and some catches of remnant bushland have also been cleared. This is criminal and must stop! It takes between 100 and 200 years for a tree to have a suitable sized hollow for our endangered black cockatoos to breed and the large old trees are also home</p>	<p>KLPL currently has amenity agreements in place for all neighbours within the 2km arc of the proposed disturbance with the exception of one confirmed as unoccupied residence and another near to at the 2km boundary which is under negotiation. KLPL intends to continue to have amenity agreements in place with all affected residences throughout the mining of the amendment area.</p> <p>Noise modelling results for the proposed Lot 63 amendment area demonstrate that mining, tails and rehabilitation activities can be undertaken within while maintaining compliance with the project noise limits for all receivers with amenity agreements within the 2km buffer zone surrounding the mining operations (Wood, 2023). Compliance was</p>	

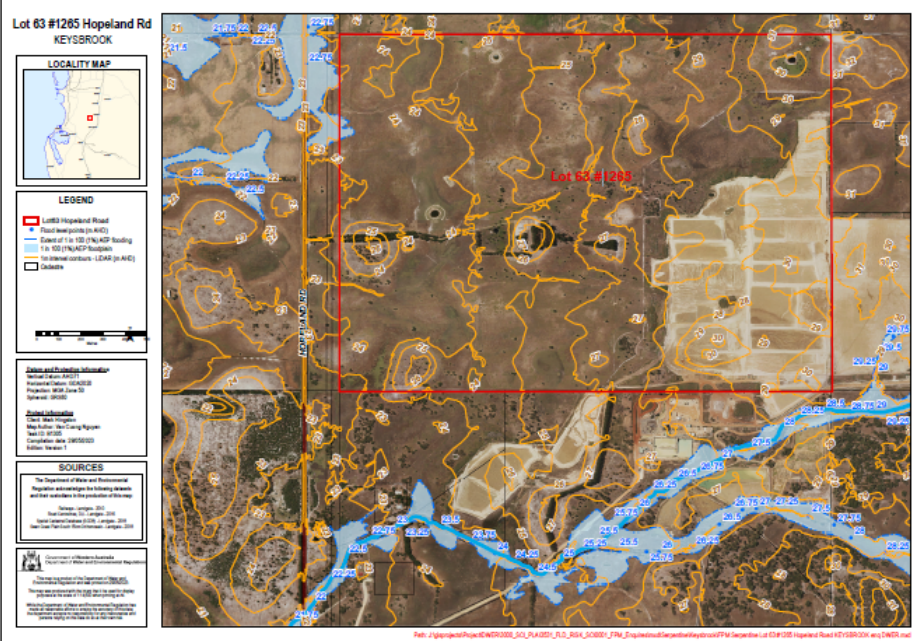
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		<p>to our local Wedge Tailed Eagles and huge numbers of other wildlife of varying species rely on the big trees for protection and food.</p> <p>There are many old large native trees and some areas of remnant bushland on the proposed amendment site.</p> <p>It is impossible to replace remnant bushland. Revegetation to replace the local bush that has been cleared is good but it is limited to replacing only the plant species that can easily and economically be propagated. There are many many species in our native bush, particularly in Banksia Woodland, that are unable to or are difficult to propagate making them not economically viable for the nurseries to sell. Our revegetation sites are all planted with the same species mix that is easy to grow. All species play an important part in each ecosystem and when one is missing something else suffers.</p> <p>Thank you for giving us, as locals affected by the proposed amendment, the opportunity to submit our concerns and opinions. I hope that the local people will be heard and that approval will not be granted.</p>	<p>demonstrated assuming implementation of the following noise mitigation measures:</p> <p>Noise bunds at mobile screening plants oriented to attenuate sound propagation towards the nearest affected receptors.</p> <ul style="list-style-type: none"> • Noise barriers at field pumps oriented to attenuate sound propagation towards the nearest affected receptors. <p>No specific noise management measures are required for mobile equipment, other than not exceeding the sound power levels and numbers of equipment items operating simultaneously assumed in the modelling scenarios.</p> <p>Predicted noise levels do not exceed the Assigned Levels at any receptors beyond the 2km buffer</p>	

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			<p>zone surrounding the mining operations.</p> <p>Mineral processing can be undertaken at all times; however, mining operations have been restricted to weekdays (Monday to Saturday 0700 to 1900hrs, excluding public holidays).</p> <p>Dust</p> <p>In relation to Dust impacts, the EPA considered that the Original Project could be managed, on the basis that:</p> <ul style="list-style-type: none"> • Mining occurs rapidly over the Project area (i.e., proximal receptors are exposed to a dust risk for a relatively short period of time) • Agreement is reached with landowners when mining in close proximity to their residence; 	<p>As discussed in the main report and based on the information provided, Officers consider that dust can be appropriately managed. The Ministerial Approval sets out the requirement to fully implement the management and monitoring measures.</p>

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			<ul style="list-style-type: none"> • An Air Quality and Dust Management Plan is implemented. <p>In accordance with the approved Air Quality and Dust Management Plan (MS810 Condition 15), dust monitoring (PM10 and total suspended particulates) is undertaken around the perimeter of the mining area and levels transmitted in real time to a website enabling immediate review in high-risk periods. A program of dust mitigation is ongoing and particularly focussed on preparation for the seasonal strong easterly winds in the summer and autumn months. Key controls include;</p> <ul style="list-style-type: none"> • Progressive backfill and rehabilitation activities, • Minimisation of open ground and stockpile areas, 	

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			<ul style="list-style-type: none"> • Utilisation of water carts to dampen active mining areas, • Utilisation of water carts adapted to distribute wet clay fines to provide a clay sealant for open areas and stockpiles, and • Stabilisation of backfilled mine voids by sowing an intermediate cover crop of ryegrass and oats to create a ground cover prior to topsoil replacement. <p>Doral undertakes individual consultation with potentially affected neighbours immediately during or following dust issues in extreme weather conditions. In addition to on-site dust mitigation controls including the shutdown of vehicle movements, offers of as necessary compensation in this circumstance are offered and well accepted.</p>	

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			<p>Groundwater</p> <p>Mining of the Keysbrook Mine commenced in 2015.</p> <p>The current Water Management Plan (MBS Environmental, 2015) (MS810 Condition 11), defines the approach to be adopted for management of groundwater and surface water. Additionally, the Groundwater Licence Operating Strategy (GLOS) (Doral, 2020) defines details of the groundwater monitoring program (i.e., abstraction quantities, water levels and water quality), trigger levels and contingency actions to mitigate potential impacts caused by the Keysbrook mining operations and also to ensure the actual impacts are not greater than predicted.</p> <p>A summary of the most recent 2021 Annual</p>	<p>As discussed in the main report monitoring and management measures to prevent adverse impacts to local groundwater and surface water should be ongoing to ensure that adjoining sensitive receptors who also draw groundwater from the same aquifer are not adversely impacted upon. This is associated with Condition 11 of the Ministerial Approval which requires monthly monitoring of water levels and quarterly monitoring of the water quality to mitigate potential impacts caused by the mining operations and also to ensure the actual impacts are not greater than predicted.</p>

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			<p>Groundwater Monitoring Summary (Groundwater Resource Management, 2021) are as follows: Totals of around 350,000kL (i.e. 11L/s) was recorded as being abstracted from the Superficial aquifer due to mining of the Bassendean Sand in 2021;</p> <ul style="list-style-type: none"> • Dewatering was done via in-pit sumps only during a two-month period (i.e., January to February 2021), which included recycled water recovered from tailings backfill; • It is understood that for most of the year mining was carried out above the water table, consequently groundwater seepage into the pits was minimal; • The groundwater level in the Superficial Aquifer continues to 	

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			<p>demonstrate a cyclical seasonal variability (between 0.4 to 3.6m, averaging 1.8m), forming a peak around August and September each year following winter rainfall and a trough around March-April at the end of the dry season. The pattern of seasonal variability in the Superficial aquifer indicates active rainfall recharge;</p> <ul style="list-style-type: none"> • The groundwater level contours for the Superficial aquifer during December 2015 and December 2021 shows a groundwater flow direction towards the west (as in the pre-mining period) and the data does not indicate any impacts to the Superficial aquifer associated with pit dewatering and tailings discharge, apart from 	

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			<p>within the immediate mining areas;</p> <ul style="list-style-type: none"> In the five years of abstraction to date there has been no evidence of impact on groundwater availability to surrounding users (Groundwater Resource Management, 2021); <p>Groundwater modelling and impact assessment (AQ2 2023, Section 5.5.2) was undertaken and indicated “minimal localised changes in the immediate area of the active mining (pits) and that these would be temporary and relatively small. There will be a negligible regional scale groundwater impact to the Superficial aquifer”.</p> <p>Clearing</p> <p>No clearing of native vegetation is proposed for the additional mine area within Lot 63. It is noted that a very minor</p>	

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			<p>area (0.13ha) of misc vegetation (present as isolated scattered shrubs/trees) will be cleared and rehabilitated in accordance with MS810 Condition 8 – rehabilitation Management Plan.</p> <p>No impacts to Black-Cockatoo habitat will occur as a result of implementing the proposed amendment area.</p>	
A60401	3.	<ol style="list-style-type: none"> 1. During the summer months huge amounts of dust get blown westwards from the mine. This can't be good for the health of anyone living in its path. It also requires huge amounts of cleaning to keep houses liveable. 2. When mining they clear any small amounts of remnant bush in their path which destroys habitat for all the birds and small animals living in the area. Any revegetation that is done now can take up to 100 years to replace what has been destroyed. 3. On still nights there is the constant sound of machines working which can be detrimental to our sleep. 4. Living in a rural area is a lifestyle choice. 	<p><u>Dust</u></p> <p>In relation to Dust impacts, the EPA considered that the Original Project could be managed, on the basis that:</p> <ul style="list-style-type: none"> • Areas of active mining move across the Project area meaning that proximal receptors are exposed to a dust risk for a relatively short period of time. 	<p>Matters raised have been discussed in the main report. As discussed in the main report the proposal would comply with the Noise Regulations and as such it is considered that the proposal would not result in adverse amenity impacts by way of noise.</p>

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		<p>To be surrounded by a noisy, dusty, environment wrecking industry is not our choice.</p> <p>The S. J. Shire logo of EXPERIENCE THE BEAUTY has definitely been lost in our area.</p>	<ul style="list-style-type: none"> • Agreement is reached with landowners when mining in close proximity to their residence; • An Air Quality and Dust Management Plan is implemented. <p>In accordance with the approved Air Quality and Dust Management Plan (MS810 Condition 15), dust monitoring (PM10 and total suspended particulates) is undertaken around the perimeter of the mining area and levels transmitted in real time to a website enabling immediate review in high-risk periods. A program of dust mitigation is ongoing and particularly focussed on preparation for the seasonal strong easterly winds in the summer and autumn months. Key controls include;</p> <ul style="list-style-type: none"> • Progressive backfill and rehabilitation activities, 	<p>As discussed in the main report and based on the information provided, Officers consider that dust can be appropriately managed. The Ministerial Approval sets out the requirement to fully implement the management and monitoring measures.</p>

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			<ul style="list-style-type: none"> • Minimisation of open ground and stockpile areas, • Utilisation of water carts to dampen active mining areas, • Utilisation of water carts adapted to distribute wet clay fines to provide a clay sealant for open areas and stockpiles, and • Stabilisation of backfilled mine voids by sowing an intermediate cover crop of ryegrass and oats to create a ground cover prior to topsoil replacement. <p>Doral undertakes individual consultation with potentially affected neighbours immediately during or following dust issues in extreme weather conditions. In addition to on-site dust mitigation controls including the shutdown of vehicle movements, offers of compensation</p>	

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			<p>additional to amenity agreements in this circumstance are offered and accepted.</p> <p><u>Clearing</u></p> <p>No clearing of native vegetation is proposed for the additional mine area within Lot 63. It is noted that a very minor area (0.13ha) of misc vegetation (present as isolated scattered shrubs/trees) will be cleared and rehabilitated in accordance with MS810 Condition 8 – rehabilitation Management Plan.</p> <p>No impacts to Black-Cockatoo habitat will occur as a result of implementing the proposed amendment area.</p> <p><u>Noise</u></p> <p>Mining the Lot 63 amendment area is proposed to occur over ~18 months and will</p>	<p>As discussed in the main report the proposal would comply with the Noise</p>

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			<p>continue as day time mining only, with mineral processing occurring 24 hours, 7 days per week.</p> <p>Noise management will continue to be applied in accordance with MS1089 Condition 14-1 and 14-2, which requires the use of amenity agreements for any noise sensitive premise within 2km of the mining operations.</p> <p>KLPL currently has amenity agreements in place for all neighbours within the 2km arc of the proposed disturbance with the exception of one residence at the 2km boundary, and intends to continue to have amenity agreements in place with all affected residences throughout the mining of the amendment area.</p> <p>Noise modelling results for the proposed Lot 63 amendment area demonstrate that mining, tails and rehabilitation</p>	<p>Regulations and as such it is considered that the proposal would not result in adverse amenity impacts by way of noise.</p>

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			<p>activities can be undertaken within while maintaining compliance with the project noise limits for all receivers with amenity agreements within the 2km buffer zone surrounding the mining operations (Wood, 2023). Compliance was demonstrated assuming implementation of the following noise mitigation measures:</p> <ul style="list-style-type: none"> • Noise bunds at mobile screening plants oriented to attenuate sound propagation towards the nearest affected receptors. Noise barriers at field pumps oriented to attenuate sound propagation towards the nearest affected receptors. <p>No specific noise management measures are required for mobile equipment, other than not exceeding the sound</p>	

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			<p>power levels and numbers of equipment items operating simultaneously assumed in the modelling scenarios.</p> <p>Predicted noise levels do not exceed the Assigned Levels at any receptors beyond the 2km buffer zone surrounding the mining operations.</p> <p>Mineral processing can be undertaken at all times; however, mining operations have been restricted to weekdays (Monday to Saturday 0700 to 1900hrs, excluding public holidays).</p> <p>Noisy, Dusty, Environment</p> <p>Noted. Doral continue to operate the Keysbrook mine in accordance with Conditions detailed in Ministerial Statement 810 and 1089. The environmental performance at the</p>	

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			<p>Keysbrook Mine progressively improved through the course of 2017 and onwards. No material matters of non-compliance or potential non-compliance have been identified in the last four years. The improvement in performance is also attributed to the cessation of night mining activities (following ownership change from MZI to Doral in July 2019), tightened operational management and monitoring procedures and improved understanding of the local environment.</p> <p>KLPL will continue to operate the Mine in accordance with all State and Federal approvals and conditions.</p>	