

Our reference: OUT24/2686



24 June 2024

Department of
**Housing, Local Government,
Planning and Public Works**

Tackle Resources Pty Limited
C/- Hetherington Exploration & Mining Title Services (QLD) Pty Ltd
Att: Ms Stacey Venter
email: brisbane@hemtsqld.com.au

Dear Ms Venter

REQUIREMENT NOTICE

RPI24/003: Tackle Resources – Westmoreland Project (given under section 44 of the *Regional Planning Interests Act 2014*)

I refer to the assessment application which was properly made on 24 June 2024 under section 29 of the *Regional Planning Interests Act 2014* (RPI Act). The application is seeking a regional interests development approval (RIDA) for resource activity: mining and other resource activities (not petroleum and gas) for the Westmoreland Project in the Gulf Rivers strategic environmental area (SEA).

Application details

Applicant	Tackle Resources Pty Limited
Project	Westmoreland Project
Description	Exploration activities for minerals
Area of regional interest	Gulf Rivers SEA
Proposed disturbance area	29 ha

Site details

Real property description	Lot 1 CP887914, Lot 1 on SP217472
Local government area	Burke Shire Council

Information Requirement

Pursuant to section 44 of the RPI Act, you are advised that further information is required to assist in the assessment of the application against the assessment criteria contained in the RPI Act and the Regional Planning Interests Regulation 2014 (RPI Regulation).

The further information required is detailed in **Attachment A**.

The period in which the information must be provided is a maximum of three months from the date of this notice.

An extension to this period may be requested if necessary.

Another requirement notice may be given if, for example, the response to this requirement notice does not provide sufficient information to assess and decide the application or in response to matters raised in a submission.

Public notification requirement

Pursuant to section 34(4) of the RPI Act, it has been determined that the application requires notification. The reason for the decision is that the delegate for the chief executive has determined that it is in the public interest for the application to be publicly notified.

In accordance with section 35 of the RPI Act, you are required to:

- publish a notice about the application '*at least once in a newspaper circulating generally in the area of the land*' as prescribed in section 13 of the RPI Regulation
- where not the owner of the land, give the owners of the land notice about the application.

Please provide proof of delivery of notice about the application to landowners to RPIAct@dasilgp.qld.gov.au

Public notification must be undertaken within 10 business days of providing the response to the requirement notice to the Department of Housing, Local Government, Planning and Public Works (DHLGPPW).

The notification period is 15 business days after the notice about the application is first published, with the closing date being a day that is after the end of the notification period.

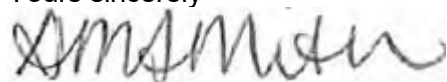
The approved form for public notification is available on DHLGPPW's website at [rpi-regional-interests-dev-approval-template.doc \(live.com\)](#)

Please provide a copy of the notice as it appears in the newspaper circulating generally in the area to RPIAct@dasilgp.qld.gov.au

You are also referred to the RPI Act Statutory Guideline 06/14 Public notification of assessment applications at [RPI Act - Statutory Guideline 06/14 \(windows.net\)](#) for further information.

If you require any further information, or have any queries, please contact Morag Elliott, Manager, Planning Group, DHLGPPW on 3452 7653 or by email at RPIAct@dasilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Susan Kidd
A/Director
Development Assessment Division
Planning Group

Encl. Attachment A

ATTACHMENT A

Information required for assessment against SEA criteria – Schedule 2, Part 5 of the Regional Planning Interests Regulation 2014

<p>1.</p>	<p><u>Issue:</u> Section 4 of the RPI Assessment Application Form lodged in support of the application indicated current title searches were included for each lot the subject of the application and that GIS data files were also included. No title searches or GIS data files were included.</p> <p><u>Actions:</u> Provide the following: a) current title searches for Lot 1 on CP887914 and Lot 1 on SP217472; and b) GIS data files.</p>
<p>2.</p>	<p><u>Issue:</u> Section 2.1 of the Assessment Application Report, dated 3 June 2024 (“Report”) includes <i>Table 1 – Expected maximum number of drill holes to be completed on MDL 2026</i> (“Table 1”).</p> <p>Table 1 sets out the location and number of drill holes across MDL 2026 in the first and second columns. The third column references “Access (km)” and the fourth column “Total Disturbance (Ha)”. “Access (km)” is interpreted to be the length of access tracks.</p> <p>There is a discrepancy in the track widths stated in the Report. Section 4.1 of the Report states, ‘New exploration tracks will need to be cleared with a small dozer (e.g., Caterpillar D6 or front loader) up to approximately 4m wide excluding windrows.’ However, in section 5.0 of the Report, the fourth bullet point in the response to (15)(1)(b)(ii) in <i>Table 6 Criteria for assessment or decision in a SEA</i> (at page 16) states, ‘Site access construction will be limited to a 3m wide track.’</p> <p>It is also unclear how the total disturbance areas in Column 4 has been arrived at for each of the drill holes and the access (tracks) line items, as currently presented in Table 1.</p> <p>For example, in “Junnagurra”, DHLGPPW considers the following would apply based on a 4m wide access track and the nominated number of drill holes:</p> <ul style="list-style-type: none"> • 40 drill holes X 0.040Ha/drill hole results in a disturbance area of 1.6Ha; and • 1.5km of access (tracks) X 4m wide (not including windrows) equals 0.6Ha of disturbance. <p>Therefore, a total disturbance of 2.2Ha (not including windrows). This differs from the 3.0Ha listed in Table 1.</p> <p><u>Actions:</u> a) Confirm what ‘Access (km)’ is referring to; b) Clarify whether the new access tracks will be 3m in width or, 4m in width; c) Revisit the disturbance calculations and confirm whether the calculations include disturbance (such as access tracks) in riverine areas, wildlife</p>

	<p>habitat and waterways (refer considerations raised at Issues 4, 6, 8 and 11);</p> <p>d) Confirm whether there will be temporary camps or any other areas of disturbance;</p> <p>e) Provide a revised Table 1 which clearly sets out and confirms the following:</p> <ol style="list-style-type: none"> i. the disturbance area of drillholes (in hectares) for each Location provided (e.g., 40 (1.6Ha)); ii. the disturbance area of access tracks (in hectares) for each Location provided (e.g., 1.5 (0.6Ha)); iii. the sum of the drillholes and access tracks for each Location line item (i.e., provide in the Total Disturbance (Ha) column); and iv. the sum total of the above (i.e., provided in the Total line item).
3.	<p><u>Issue:</u> Appendix 1 of the Report is a plan titled <i>Locations for Planned Exploration within MDL 2026</i>. The plan denotes various areas of disturbance. Given the matters raised in item 2, 4, 6, 8 and 11 of this Requirement Notice, there are concerns with the accuracy of the information provided. Moreover, the plan provided is not particularly legible.</p> <p><u>Actions:</u> Provide a new plan that:</p> <ol style="list-style-type: none"> a) addresses the matters raised at Item 2, 4, 6, 8 and 11 of this Requirement Notice and in particular, provides the appropriate areas of disturbance; b) denotes the existing access track on Lot 1 on SP217472 in a different colour to the MDL boundary; and c) is legible for the reader.
4.	<p><u>Issue:</u> Section 4.3 <i>Riparian processes</i> within the Report states: <i>Drilling activity in riparian areas will be minimized . . . , it is not expected that the proposed exploration activities would have widespread or irreversible impacts on riparian function in the area of activity or the wider tenement area.</i></p> <p>However, the location and area of drill pads and tracks proposed in riverine areas is not clearly identified or quantified.</p> <p>Consequently, it is unclear if minimising drilling activity in riparian areas will be sufficient to prevent widespread or irreversible impacts to riparian areas.</p> <p><u>Actions:</u></p> <ol style="list-style-type: none"> a) Identify the locations of disturbance proposed within riverine areas. b) Quantify the area of disturbance proposed within riverine areas; c) Provide a description of the impacts of vegetation clearing in riverine areas on the environmental attributes of water quality, riparian processes and wildlife corridors; and d) Provide a description of the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes.
5.	<p><u>Issue:</u> In the pre-lodgement meeting of 27 May 2024, the department raised the concern around the potential presence of culturally significant areas within the MDL, given the variation condition that applies to the environmental authority. This does not appear to have been addressed in the application.</p>

	<p><u>Actions:</u> Provide information on any known culturally significant areas and/or artefacts within the relevant tenure. This includes, but is not limited to, a search of the Cultural Heritage Register.</p>
6.	<p><u>Issue:</u> Table 6 <i>Criteria for assessment or decision in a SEA</i> of the Report states, 'It is considered that only minor disturbance to the wildlife corridors in the area will occur'. However, it is not clear where within the MDL boundary the applicant may impact wildlife corridors, nor what the applicant considers to be 'minor disturbance to the wildlife corridors'. Departmental mapping indicates that areas of wildlife habitat (endangered or vulnerable) and wildlife habitat (special least concern) are present within the MDL. Those areas coincide with proposed drilling areas labelled as "Black Hill", "Long Pocket" and "U-Valley", as depicted in Appendix 1 of the Report.</p> <p><u>Actions:</u></p> <ol style="list-style-type: none"> a) Identify the locations and area of disturbance proposed within identified wildlife habitat/corridors; b) Provide a description of the impacts of the proposed activity to wildlife habitat and wildlife corridors and in particular, expand on what is meant by "minor disturbance". Also explain how light or sound from the proposed activities may affect movement of fauna; and c) Provide a description of the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes.
7.	<p><u>Issue:</u> Section 2.3 <i>Water Supply</i> of the Report proposes that water may be extracted from groundwater bores. However, it is unclear if this may impact groundwater-dependant ecosystems (GDE) in riverine areas. It is unclear how section 15(1)(b)(iii) is to be achieved, as stated in Table 6 of the Report if groundwater draw down occurs in the dry season (thereby potentially leading to potential loss of groundwater connection for GDE).</p> <p><u>Actions:</u></p> <ol style="list-style-type: none"> a) Provide an assessment of any potential impacts the extraction of groundwater may have groundwater-dependant ecosystems; and b) Provide a description of the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes.
8.	<p><u>Issue:</u> It is unclear from the Report how waterway crossings may be undertaken, where they will be, or how they have been minimised.</p> <p><u>Actions:</u></p> <ol style="list-style-type: none"> a) Identify the locations of proposed waterway crossings. b) Provide a description of the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes.
9.	<p><u>Issue:</u> The Report states that disturbance will be conducted in the dry season to limit erosion. However, it is unclear if the applicant has committed to undertaking rehabilitation works to ensure that no disturbance remains by the commencement of the wet season.</p>

	<p><u>Actions:</u> Clarify whether rehabilitation is intended to be undertaken and completed prior to the commencement of the wet season.</p>
10.	<p><u>Issue:</u> Condition B29 of the environmental authority (EA) requires rehabilitation that, by way of seeding/planting, promotes vegetation of similar species and density to the surrounds. However, the Report does not state what seed mix or planting or other strategies to ensure riverine and wildlife corridor areas return to the density and species of the surrounds.</p> <p><u>Actions:</u> Provide proposed rehabilitation strategies that align with the objectives authorised throughout the EA, including a description of the seed mix or planting to be employed to ensure riverine and wildlife corridor areas return to the density and species of the surrounds.</p>
11.	<p><u>Issue:</u> The Report provides general locations of ore bodies where drilling will be conducted (see plan at Appendix 1). However, the level of disturbance to sensitive areas is not provided. The plan denotes the location of the existing access track on Lot 1 on SP217472 but does not show any proposed tracks or location of drill pads within MDL 2026.</p> <p>The Report therefore does not adequately demonstrate how section 15(1)(b)(ii) is to be achieved.</p> <p><u>Actions:</u> Provide information to substantiate that the footprint has been minimised, including, but not limited to, depicting disturbance spatially (rather than just a maximum extent).</p>
For noting	<p>Although not a matter that requires addressing by the applicant, the department notes that the total proposed disturbance of 29ha is contrary to the eligibility criteria that applies to the environmental authority, which constrains disturbance to 10ha. Any area of rehabilitation would need to be progressively certified (undertaken by way of an applicant-driven application and assessment process), before it could be deducted from the disturbance area.</p>