



Queensland
Government

Department of
**State Development,
Infrastructure and Planning**

Our ref: D24/189673

29 November 2024

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

FURTHER 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).

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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.

If you require any further information, or have any queries, please contact Mr Darren Brewer, Manager – Appeals and Regional Interests, Planning Group, DSDIP on (07) 3452 7472 or by email at RPIAct@dasilgp.qld.gov.au who will be pleased to assist.

Yours sincerely



Phil Joyce
**A/Executive Director
Innovation and Assessment
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

1.	<p><u>Groundwater Dependand Ecosystems (Item 7 of requirement notice issued on 24 June 2024 [the previous requirement notice])</u></p> <p><u>Issue:</u></p> <p>The response to the previous requirement notice does not specifically state the impacts to Groundwater Dependent Ecosystems (GDE). For example, the response states: “<i>Impacts on aquatic ecosystems can arise from four sources</i>” and identifies that predicting the likelihood and extent of impacts to aquatic, riverine and GDE resulting from exploration activities as challenging. Further, the response talks to challenges of measuring the impacts, however, does not state what the impacts to GDE are. Reference to monitoring programs is also made, however the specific monitoring proposed to be used in reference to this application is unclear. Sump methodology is mentioned as a mitigation strategy, though has not been adequately described.</p> <p><u>Actions:</u></p> <p>Please take the following action:</p> <ul style="list-style-type: none">• Revise the GDE assessment to include details of the location of GDE within MDL2026.• Describe the impacts to GDE as a result of the proposed exploration activities.• Include information on how ‘sump methodology’ and associated water will mitigate impacts to GDE.• Provide a monitoring program specific to the impacts expected as a result from this application.
2.	<p><u>Flora Survey and Fauna occurrence mapping survey</u></p> <p><u>Issue:</u></p> <p>During the meeting held on 13 November 2024, the Department of the Environment, Tourism, Science and Innovation (DETSI) received verbal advice from the applicant that a flora survey and/ or fauna occurrence mapping had been completed.</p> <p><u>Actions:</u></p> <p>Please take the following action:</p> <ul style="list-style-type: none">• Provide the results of the flora survey, including:<ul style="list-style-type: none">○ an ecological report; and○ spatial information that depicts the extent of the regional ecosystem.• Provide the results of the fauna occurrence mapping, including:<ul style="list-style-type: none">○ an ecological assessment, which considers the impacts of proposed exploration disturbance on fauna species and vegetation that forms habitat for the identified fauna species; and○ spatial information that depicts the occurrence of endangered or vulnerable fauna species.

3.	<p><u>Clarify the proposed exploration activities</u></p> <p><u>Issue:</u></p> <p>Following the meeting of 13 November 2024, DETSI understands that the applicant has confirmed that the RIDA application is intended to cover both the proposed access track to the north of MDL2026, as well as all proposed exploration disturbance stated in <i>Table 1 – Expected maximum number of drill holes to be completed on MDL2026</i> of the response to the previous requirement notice.</p> <p>The response to the previous requirement notice does not clearly indicate whether proposed exploration activities are intended to be conducted in the dry or wet season. Clarification on this is required as the impacts, mitigation strategies and management controls relevant to this timing will determine the level of impact to environmental attributes.</p> <p><u>Actions:</u></p> <p>Please take the following action:</p> <ul style="list-style-type: none"> • Confirm that the proposed disturbance areas stated in <i>Table 1 – Expected maximum number of drill holes to be completed on MDL2026</i> are correct and are intended to be assessed as part of the RIDA application. • Ensure that the exploration disturbance extent and level of impact proposed in supporting information aligns with the level of impact proposed to vegetation and fauna species in item 2 of this requirement notice. • Clarify whether activities are proposed to be conducted during the dry season or the wet season and provide an assessment of the impacts and mitigation measures to align with the seasonal activities proposed.
4.	<p><u>Riparian vegetation and processes (Item 1 of the previous requirement notice)</u></p> <p><u>Issue:</u></p> <p>Item 1 of the previous requirement notice highlighted that the location and area of drill pads and tracks proposed in riparian areas was not clearly identified or quantified in the supporting information. The risks associated with clearing vegetation and the associated impacts have not been appropriately considered. It remains unclear how minimising the drilling activity within riparian areas will be sufficient to prevent widespread or irreversible impacts to riparian areas, as the impacts of exploration in riparian areas is associated with the clearing of critical vegetation responsible for stabilisation of stream banks.</p> <p><u>Actions:</u></p> <p>Please take the following action:</p> <ul style="list-style-type: none"> • Identify the locations (map and coordinates) of disturbance proposed within riparian areas (this is required in order to demonstrate a cumulative impact will not occur). • Advise the area (ha) of riparian vegetation that requires clearing. • Describe the impacts of vegetation clearing in riparian areas on the environmental attributes of water quality, riparian processes and wildlife corridors. Demonstrate and explain how a widespread or irreversible impact will not result from the proposed activity

	<ul style="list-style-type: none"> Describe the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes.
5.	<p><u>Watercourse/ waterway crossings</u></p> <p><u>Issue:</u> The information provided on the proposed watercourse/ waterway crossings (crossings) is unclear.</p> <p>The location (coordinates and map) of proposed crossings has not been provided. An assessment of the impacts associated with the proposed crossings (specific to this application) is not provided. Exploration activities have been identified as the environmental impact; however, this information does not describe the impacts of the crossings on the environmental attributes of riparian processes, functioning wildlife corridors and water quality. It is unclear if the proposed activity will cause widespread or irreversible impacts to the environmental attributes.</p> <p>Further, the mitigation and management strategies suggested in the response to the previous requirement notice do not consider the potential impacts of exploration activities specifically proposed for this RIDA, because details of those impacts have not been included in the application material.</p> <p><u>Actions:</u> Please take the following action:</p> <ul style="list-style-type: none"> Identify the locations (coordinates and map) of proposed watercourse/ waterway crossings. Identify the stream order associated with the crossing. Include information on whether the crossings are a wildlife corridor, and whether the crossings contain vegetation identified as Endangered Regional Ecosystems (ERE) or Matters of State Environmental Significance (MSES). Describe the impacts of the proposed crossings (specific to this application) on the environmental attributes of riparian processes, wildlife corridors and water quality. Provide a description of the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes.
6.	<p><u>Fauna Habitat (Item 6 of the previous requirement notice)</u></p> <p><u>Issue:</u> Item 6 of the previous requirement notice requested that the applicant identify the location and area of disturbance proposed in identified wildlife habitat areas. Details of the specific locations of identified wildlife areas, and identification of the fauna species to be impacted, have not been provided.</p> <p>The response (to the requirement notice) states that 3.28ha of disturbance is proposed within wildlife habitat for endangered or vulnerable taxa. Further, the response identifies <i>"There will be environmental impacts that will need to be addressed including access tracks, drill pads, transport activities and drilling etc. The transient and often isolated nature of exploration activities have the potential to adversely impact on the environment</i></p>

if they are not managed appropriately." However, a description of the specific impacts to each fauna species relevant to this application has not been included.

A description of how vegetation clearing and other associated exploration activities will impact the endangered or vulnerable species has not been included. Consideration for the planned activities and how the fauna species utilise the land and associated vegetation has not been included. Additionally, details of the specific mitigation controls and management strategies to be utilised have not been provided.

Point c) of the response to item 6 of the previous requirement notice references desktop assessments, ecological investigations and likelihood of occurrence for fauna and associated habitat. However, this information has not been included. The response also states, "*No targeted fauna surveys are proposed at this stage as the probable impacts associated with the drilling program are relatively minor in duration and extent.*" This statement is contradictory to the assessment that "*activities have the potential to adversely impact on the environment if they are not managed*". Assessment of the likely impacts and risks associated needs to be clarified and included.

It is noted that the applicant indicated that field investigations for on-ground validation of mapped regional ecosystems were planned. Information and results of the on-ground assessment have not been included. A list of matters which are considered in context to wildlife habitat requirement is provided, however this information is not specific to the application and species identified as vulnerable or endangered throughout the land relevant to this RIDA.

The response does not demonstrate how clearing will be carried out or minimised to ensure that the extent of suitable habitat and associated connectivity will allow for the mobility of fauna species relevant to this application. Furthermore, the response states:

Even in instances where rare or threatened fauna species are no longer present in an area, if surveys show the habitat to be either formerly occupied by the species, or suitable, then it should be managed accordingly, since it is possible that the species may colonise or be reintroduced at some later stage.

It is unclear if reintroduction of species is intended to occur during, or following, exploration activities. The application does not contemplate endangered or vulnerable fauna species no longer utilising an area of habitat as an impact.

Actions:

Please take the following action:

- Identify the locations (map and co-ordinates) of disturbance proposed within identified wildlife habitat/corridors.
- Identify the fauna species and associated habitat that the activities propose to impact.
- Include details of how each vulnerable or endangered fauna species use the habitat and wildlife corridors. Consider the different structural and functional elements of the ecosystem that the fauna species rely on when assessing impact.

	<ul style="list-style-type: none"> • Provide a description of the impacts of the proposed activity to endangered or vulnerable fauna species and the wildlife habitat/ corridors that the species utilise. Ensure the proposed impacts align with any fauna occurrence assessment or on-ground vegetation field assessments. • Clarify if Tackle Resources contemplate fauna no longer utilising an area of habitat occurring as a result of proposed activities. • Describe the mitigation and management strategies proposed to be utilised to reduce impacts to the identified environmental attributes. Demonstrate and explain how a widespread or irreversible impact will not result from the proposed activity.
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>

