

Submission on the Notice of Significant Variation

Primary Gold Pty Ltd – Rustlers Roost and Quest 29 Open-cut Mine Redevelopment - NOSV

This submission is made under section 51 of the *Environment Protection Act 2019* and Regulation 171 of the Environment Protection Regulations 2020

Government authority: Department of Industry, Tourism and Trade (DITT)

Summary:

DITT (Mining Division) has reviewed the Notice of Significant Variation for the Rustlers Roost and Quest 29 Open-Cut Mine Redevelopment and considers that the previous comments on the EIS referral (EP2021/005) are still relevant. In summary DITT identifies information gaps regarding;

- construction of the tailings dam over the heap leach;
- the potential for geotechnical failure and seepage from the tailing storage facility;
- the risk of AMD from mine structures; and
- the risk of contamination of groundwater from mined pits and potential draw down of groundwater.

Additional comments are provided in the table below.

Section of Referral	Theme or issue	Comment
Table 2 A new waste rock dump (WRD) has been introduced to the north of the TSF and processing plant.	WRD expansion	<i>"The northern WRD expands the project footprint for the entire upper catchment of an unnamed watercourse flowing north in Mount Bunday Creek and thus increases risks associated with surface water runoff"</i> . DITT recommends this change and the associated risks are addressed in the future EIS.
Table 2 Expanded main pit and two new small pits are now proposed.	Information gap	The location of the new Annie Oakley Pit poses risk of additional environmental impacts. The southern edge of Annie Oakley Pit is on the mineral lease boundary and a creek line. DITT recommends potential environmental risks associated with this be identified and the EIS should demonstrate management of these risks.
Table 2 Overall water demand for the operation has changed from 3.3 GL/yr. to 6.5 GL/yr.	Information gap	DITT recommends the EIS address the significant increase in water demands, identify potential impacts and mitigation strategies and provide an updated water balance.