Section 5

Draft Statement of Commitments

PREAMBLE

This section has been prepared in accordance with the requirements of the Environmental Planning and Assessment Act 1979, and presents a compilation of the actions and initiatives the Applicant commits to implement if the Proposal receives development consent. These commitments are designed to effectively manage, mitigate, guide and monitor the Proposal through the construction, operational and rehabilitation phases.

The Environmental Impact Statement for the Proposal has identified a range of environmental, social and economic management outcomes and measures which would be required to avoid or reduce potential adverse environmental and socio-economic impacts of the Proposal.

All parties involved in all phases of the Proposal would be required to undertake their work in accordance the conditions of the development consent that will incorporate a final set of commitments.

For each draft commitment, the desired outcomes are provided together with the intended actions and timing for the implementation of the nominated actions.

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Table 5.1
Draft Statement of Commitments

Desired Outcome	Action	Timing
1. Environmental Management		
Compliance with all conditional requirements in all approvals licences and leases.	1.1 Comply with all commitments recorded in **Table 5.1** (this table).	Continuous and as required.
	1.2 Comply with all conditional requirements included in the: • Development consent; • Environment Protection Licence; • Mining Lease(s); • Approval under the EPBC Act; and • any other approvals.	Ongoing.
2. Area of Activities		
All approved activities are undertaken generally in the location(s) nominated on the figures shown in Sections 2 and 4.	2.1 Mark, and where appropriate, survey the boundaries of the areas of proposed disturbance on the DZP Site.	Prior to the commencement of site establishment and construction in the respective component area.
	2.2 Mark, and where appropriate, survey the alignment of the Toongi – Dubbo Rail Line and Gas Pipeline Corridor.	Prior to the commencement of the relevant activity.
	2.3 Mark, and where appropriate, survey the alignment of the Macquarie River Water Pipeline.	Prior to the commencement of the relevant activity.
	2.4 Mark, and where appropriate fence, boundaries relevant to the Biodiversity Offset Area.	Within 6 months of approval of the Biodiversity Offset Area.
	2.5 Construct perimeter security fence as early as possible during construction operations to limit the potential for inadvertent or unauthorised access to the operational sections of the DZP Site.	Within 3 months of commencement.
3. Operating Hours		
All operations are undertaken within the approved operating hours.	3.1 Undertake all activities, where practicable, in accordance with the following operating hours.	Continuous and as required.

Activity	Proposed Days of Operation	Proposed Hours of Operation
Vegetation clearing and topsoil stripping	7 days a week (per campaign)	Daylight hours
Construction operations	7 days a week	Daylight hours[1]
Open cut mining operations	5.5 days a week	7:00am to 6:00pm
Blasting operations	5.5 days a week	9:00am to 5:00pm[2]
Maintenance operations	7 days a week[3]	24 hours per day
Processing operations	7 days a week	24 hours per day
Rehabilitation operations	5.5 days a week	Daylight hours

Note 1: Low noise generating work such as electrical installation and plant fit-out may be undertaken outside of these nominated hours of operation.
Note 2: Unless required for misfire re-blast, emergency or safety reasons.
Note 3: Maintenance operating hours on mining fleet will be as for the mine production hours

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
4. Noise			
Noise generated by construction and operational activities does not exceed intrusiveness criteria nor significantly impacts on neighbouring landowners and/or residents.	4.1	Strictly adhere to the INP nominated standard hours of operation.	On-going.
	4.2	Ensure only equipment outlined in Section 4.2 (or alternative equipment with equivalent sound power levels) is used for all construction and operating activities.	Ongoing.
	4.3	Limit equipment to be operated on DZP Site construction activities to that identified on **Figures 4.9** to **4.11** (or equivalent), i.e. redeploy existing equipment.	Ongoing.
	4.4	Install and maintain appropriate mufflers and noise retarding barriers to mechanical plant and equipment and frequency modulated reversing alarms on mobile equipment.	Ongoing.
	4.5	Prohibit unnecessary idling of equipment during construction operations.	Ongoing during construction.
	4.6	Notify local residences of plans for nearby construction, duration of construction and plans in place to mitigate noise impacts.	As required during construction.
	4.7	Educate all contractors and personnel regarding the sensitivities relating to noise	Ongoing and as part of site induction.
	4.8	Fit broadband (frequency modulated) reversing alarms to mobile equipment	Ongoing.
	4.9	Operate the mining fleet with sound power levels equivalent to those nominated in *Table 4.3* of EMM (2013).	Ongoing
	4.10	Construct semi-enclosed barriers and screens around the crushing plant and ore handling circuit equivalent to those presented in *Figures 8* and *9* of EMM (2013).	Prior to commencement of plant operation.
	4.11	Complete a detailed review of potential enclosures, noise barriers and other attenuating measures prior to construction, taking into consideration the frequency and amplitude generated by the processing plant.	Prior to construction of processing plant noise attenuation.
	4.12	Avoid night time loading and unloading of trains (unless necessary to meet allocated rail path).	Ongoing.
	4.13	Enforce low noise operation of forklifts for night time loading and unloading of trains.	Ongoing.
	4.14	Prepare a *Noise Management Plan* (NMP) detailing activities to manage construction and operational noise emissions from project-related activities.	Prior to the commencement of the construction activities.
Noise generated by blasting does not exceed criteria nor significantly impacts on neighbouring landowners and/or residents.	4.15	Design and implement blasting events by a suitably qualified blasting engineer or experienced shot-firer to ensure all relevant noise and safety criteria are met.	Ongoing.
	4.16	Prepare a *Blast Management Plan* (BMP) detailing activities to manage blasting and vibration emissions from project-related activities.	Prior to the commencement of blasting.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
4. Noise (Cont'd)			
Noise generated by the DZP is monitored and procedures developed and implemented to respond to ensure compliance is maintained.	4.17	Install real-time noise monitoring and communication equipment at an appropriate location.	Prior to commencement of operations.
	4.18	Establish appropriate noise trigger levels at the real-time noise monitoring location that would ensure that the relevant noise criteria are not exceeded at residences surrounding the DZP Site.	
	4.19	Establish a procedure whereby on-site personnel are notified when noise levels recorded by the real-time monitor approach the identified trigger levels.	
	4.20	Establish weather station monitoring procedures and adverse weather trigger levels.	
	4.21	Ensure that a 24-hour complaints telephone line is maintained and that the surrounding community is made aware of the number.	Prior to the commencement of operations.
	4.22	Ensure that prompt action is taken to identify the nature of any complaint received and verify the relevant noise levels using the real-time noise monitoring equipment.	Within 24 hours of receipt of complaint.
5. Air Quality			
Dust generated during the construction stage does not exceed the nominated air quality criteria	5.1	Identify triggers and procedures for dealing with unfavourable meteorological conditions, such as when it is dry and windy.	Prior to commencement of construction stage.
Dust generated during the operations stage does not exceed the nominated air quality criteria	5.2	Prepare an *Air Quality Management Plan* (AQMP) prior to the commencement of operations to record procedures for controlling dust impacts during operations.	Prior to commencement of operations.
	5.3	Adopt Level 2 watering to achieve 75% control of dust from haul roads.	Ongoing and as required.
	5.4	Implement dust control measures during drilling of ore and overburden.	Ongoing and as required.
	5.5	Prevent wind erosion on stockpiled material.	Ongoing and as required.
Minimise emissions to the atmosphere from the processing plant.	5.6	Use dust control measures at relevant crushers and miscellaneous transfer points (not already enclosed).	Ongoing and as required.
	5.7	Operate a bag house to capture particulate matter from the grinding mill.	Ongoing.
	5.8	Regulate emissions from the stacks and vents by operating within the prescribed in-stack concentrations limits.	Ongoing.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
5. Air Quality (Cont'd)			
Minimise emissions to the atmosphere from the processing plant. (Cont'd)	5.9	Undertake periodic extractive monitoring to demonstrate compliance with in-stack limits.	Every 3 months for the first year of operation and then annually, if compliance achieved.
	5.10	Implement a regular and documented maintenance and inspection program for all plant items where emissions to air are deemed likely.	Prior to commencement of processing and then ongoing.
Minimise greenhouse gas emissions.	5.11	Implement an energy use and efficiency program.	Within 12 months of commencement of operations.
	5.12	Develop targets for greenhouse gas emissions and energy use, and monitor and report against these.	
	5.13	Undertake regular maintenance on diesel and electrically powered plants to ensure they operate efficiently.	Ongoing.
	5.14	Dedicate a number of trucks for each excavator to minimise truck wait times.	Ongoing.
	5.15	Ensure that haul trucks are fully loaded to maximise productivity and efficiency.	Ongoing.
	5.16	Assess and periodically review lighting plant efficiency.	Annually.
6. Radiation			
Provide for appropriate controls to minimise potential for discharge or dispersal of radiation.	6.1	Design the residue storage facilities as a zero-discharge facility with a geo-membrane lining and leak detection system.	Complete.
	6.2	Ensure that all heavy mining equipment is air conditioned to minimise impacts of dust to workers.	Ongoing.
	6.3	Minimise dust using standard dust suppression techniques (refer to Commitments 5.2 to 5.5).	Ongoing.
	6.4	Construct a separate wash-down pad for vehicles that have come from any operating areas.	During construction phase.
	6.5	Construct bunding to collect and contain spillages from tanks containing process slurries.	During construction phase.
	6.6	Bury or bund the residue pipelines to control spillage from residue pipeline failures.	During construction phase.
	6.7	Ensure sufficient access and egress for mobile equipment to allow clean-up where there is the possibility for large spillages.	Ongoing.
	6.8	Achieve nominated leach and precipitation of radionuclides from ore prior to production of final compounds.	Ongoing.
	6.9	Install a venturi scrubber and wet electrostatic precipitator (ESP) as part of the FeNb processing circuit to capture and remove volatilised Polonium 210 and Lead 210 prior to ventilation from the circuit.	During construction phase.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
6. Radiation (Cont'd)			
Provide for appropriate controls to minimise potential for discharge or dispersal of radiation. (Cont'd)	6.10	Slurry and mix residues from the FeNb processing circuit scrubber and ESP with the solid residues for disposal in the SRSF.	Ongoing.
Appropriately classify work areas to allow for implementation of appropriate OHS management.	6.11	Define and operate the DZP Site as a "supervised area" (as defined in ARPANSA, 2005).	Prior to commencement of mining and processing.
	6.12	Define and operate the open cut, crushing and grinding areas, light rare earths processing area and FeNb processing circuit as "controlled areas" (as defined in ARPANSA, 2005).	
	6.13	Define and designate employees working in the controlled areas as designated radiation workers.	
	6.14	Ensure "designated workers" change into work clothes at the commencement of their shift and then shower and change into "street clothes" at the end of their shift.	
	6.15	Launder dirty clothes on-site, with waste water sent to an on-site water treatment plant.	
Ensure only authorised access to the DZP Site.	6.16	Ensure all visitors entering and departing the DZP Site report to the gatehouse or other nominated locations for registration including time of arrival and departure, and an induction, if required.	Prior to commencement of mining and processing.
	6.17	Link access to the DZP to a record keeping system to ensure that all personnel accessing the DZP Site have been appropriately inducted.	
	6.18	Ensure vehicle access is through the main boom gate.	
	6.19	Ensure the exit from the DZP Site of all vehicles having trafficked a controlled area pass through the wheel wash.	
Establishment of site-wide administrative controls.	6.20	Ensure pre-employment and routine medical checks for workers.	Prior to employment.
	6.21	Ensure inductions and regular training of all employees and contractors	As part of induction and then ongoing.
	6.22	Develop safe work procedures which will include: radiation safety aspects; procedures to segregate, isolate and clean up contamination or contaminated equipment; and procedures for equipment or materials leaving the controlled area.	Prior to commencement of operations.
	6.23	Enforce mandatory use of personal hygiene facilities (wash facilities) at entrances to lunch rooms and offices.	Ongoing.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
6. Radiation (Cont'd)			
Establishment of site-wide administrative controls. (Cont'd)	6.24	Employ suitably qualified and experienced radiation safety professionals to assist during the final design, construction and the operational phases of the Proposal.	As required.
	6.25	Use a computer based data management system to store and manage all information relating to radiation management and monitoring.	Develop prior to commencement and operate for the life of the DZP.
Systems for managing potentially radioactive wastes.	6.26	Ensure material such as contaminated equipment and wastes from operational areas, including discarded conveyor belts, rubber lining material, pipes, filter media and used protective equipment is cleaned within the Processing Plant Area and disposed of in accordance with approved regulatory controls.	As required.
7. Surface Water			
Appropriately document water management measures including erosion and sediment control.	7.1	Prepare and continuously update a *Water Management Plan* for the Proposal, including a detailed *Erosion and Sediment Control Plan* prepared by a suitably qualified expert.	Prior to commencement of operations.
Separate clean water from dirty water	7.2	Ensure that all surface water flows from undisturbed sections of the DZP Site are diverted around disturbed sections and are permitted to flow to natural drainage.	Ongoing.
Design and construct surface water management structures to prevent the discharge of polluted water from the DZP Site and minimise impacts on environmental flows	7.3	Ensure that all potentially salt or chemical-laden water is retained within the DZP Site and is used for processing operations or is sent to the LRSF.	Ongoing.
	7.4	Ensure 1m freeboard is maintained to provide for 1 in 10 000 ARI event and effects of wave run-up in the LRSF.	Prior to discharge of liquid residue.
	7.5	Complete a detailed analysis of wave run-up and (if necessary) either: • reduce the operating liquor level; • increase embankment height; or • install a wave break device in each cell upstream of the embankment.	Prior to LRSF construction.
	7.6	Ensure that all runoff from mineralised ore or waste rock, i.e. from the ROM Pad or WRE, is directed to storage basins capable of accepting double the 1 in 100 ARI storm event and equipped with pumps.	Ongoing.
	7.7	Activate pumps following in-flow of water to the storage basins and discharge to the LRSF.	As required.
	7.8	Ensure that all potentially sediment-laden water is directed to appropriately designed sediment basins and is either used for processing operations or dust suppression or, following testing to verify the quality of the water is acceptable, is discharged to natural drainage.	Ongoing.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
8. Surface Water (Cont'd)			
Site infrastructure does not compromise surface water management.	7.9	Ensure that all roads within the DZP Site are constructed in accordance with DECC (2008b).	Prior to the commencement of the relevant activity.
	7.10	Ensure that all areas where reagents or processing-related chemicals are used or stored are bunded and, where appropriate, covered. If not covered, a suitable sump for the collection and removal of incident rainfall will be included.	
Surface water control structure integrity is maintained through life of the Proposal.	7.11	Inspect all surface water control structures at least quarterly and following any rainfall event of more than 10mm in 24-hours to ensure their adequacy, and identify where remedial action is required.	Ongoing and in response to rainfall events.
Water access does not exceed harvestable rights.	7.12	Ensure that the capacity of existing and proposed water storages to be constructed under the Applicant's harvestable rights does not exceed 182ML.	Ongoing.
Natural surface water management is in effect when site is relinquished.	7.13	Ensure that all areas of proposed disturbance, with the exception of the proposed open cut, are progressively rehabilitated and that surface water control structures are removed once the rehabilitated areas have achieved a 70% cover.	Progressively with rehabilitation.
8. Groundwater			
Minimisation of groundwater contamination from the SRSF and SEC's.	8.1	Construct each cell of the SRSF and SEC with a double liner, at least one of which is HDPE.	Prior to the commencement of processing operations.
	8.2	Construct the SRSF and each SEC cell with a leak detection system and leak / seepage collection mechanisms.	
	8.3	Maintain the leak detection system following the completion of the SECs until such time as leakage is deemed (by hydrogeologist) to be unlikely.	
	8.4	Install groundwater monitoring bores around the SRSF and SECs to monitor for changes in water chemistry which could indicate a leak.	
Minimisation of groundwater contamination from the LRSF.	8.5	Construct each cell of the LRSF with a HDPE liner.	During construction.
	8.6	Weld the liner to form a continuous barrier over the internal embankments.	During construction.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action	Timing
8. Groundwater (Cont'd)		
Minimisation of groundwater contamination from the LRSF. (Cont'd)	8.7 Adopt and implement a *Cell and Liner Construction Protocol* which would incorporate the following. • Certification of all lining material from the manufacturer prior to delivery to the DZP Site. • Registration of all individual batches of the lining material recorded by the contractor. • Construction of cell foundations in accordance with the extents and grades shown on the final drawings. • Preparation of the cell foundations to ensure removal of all roots, rocks and other matter which could impact on the liner. • Procedures for reviewing works completed if delays incurred between cell foundation preparation and liner laying. • Final inspection procedures and contingency measures.	Prior to construction of the LRSF.
	8.8 Adopt and implement a *Liner Integrity Testing Protocol* which would incorporate the following. • Installation of the HDPE lining by an experienced contractor. • Conformance of all lining material and construction methods and testing to the relevant Australian Codes. • Certification of all equipment prior to the start of installation and at regular intervals during the work. • Testing of the welding of the liner by the contractor and by an independent testing organisation. • Removal and off-site laboratory testing of small sections of the liner and contingency measures.	Prior to construction of the LRSF.
	8.9 Monitor the water balance within each cell, based on on-site monitoring of rainfall, evaporation and discharge.	Ongoing following commencement of discharge to the LRSF.
	8.10 Monitor water levels and quality beyond the downstream toe of all external embankments.	Monthly.
	8.11 Design and implement a *Leak Detection Response Strategy*.	Prior to commencement of discharge to the LRSF.
	8.12 Harvest precipitated salts in accordance with a *Salt Harvesting Protocol*.	Prior to and during salt harvesting campaigns.
Minimise impact to Groundwater Dependent Ecosystems	8.13 Manage potential leakage from the LRSF, SRSF and SECs in accordance with Commitments 8.1 to 8.12 above.	Ongoing.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action		Timing
9. Groundwater (Cont'd)			
Minimise potential for dryland salinity	8.14	Manage potential leakage from the LRSF, SRSF and SECs in accordance with Commitments 8.1 to 8.13 above.	As above.
	8.15	Establish deep rooted vegetation between LRSF Areas 2 and 3 within the proposed Biodiversity Offset Area.	Over initial 5 years of operations.
Appropriately document water management measures including monitoring design in and implementation	8.16	Ensure a *Water Management Plan* is prepared by a suitably qualified expert including guidance on interpretation of groundwater data.	Prior to commencement of mining operations.
Ensure groundwater is available to all surrounding groundwater users	8.17	Include monitoring of standing water levels in *Water Management Plan* and any significant rise or decline of these levels be investigated immediately.	Ongoing.
9. Terrestrial Ecology			
Avoid impacts on native flora and fauna.	9.1	Locate the DZP Site activities and infrastructure so as to avoid the majority of remnant native vegetation. Restrict disturbance of remnant native vegetation to (approximately): • 0.1ha of CW138 Fuzzy Box – Inland Grey Box on alluvial brown loam soils of the NSW South West Slopes Bioregion; • 27.1ha of CW212 White Box – Tumbledown Gum woodland on fine-grained sediments on the Central West slopes; • 43.7ha of CW213 White Box – White Cypress Pine – Inland Grey Box woodland on the western slopes of NSW (Quality Remnants); and • 414.0ha of CW213 White Box – White Cypress Pine – Inland Grey Box woodland on the western slopes of NSW (Derived Grasslands western slopes of NSW Central West slopes ZP Site subject , SRSF, open cut, WRE and Salt Encapsulations C).	Ongoing.
	9.2	Undertake Obley Road realignment activities to limit disturbance to 1.1ha of CW145 Inland Grey Box tall grassy woodland on alluvial loam and clay soils in the South Western Slopes and Riverina Bioregions.	Ongoing.
	9.3	Avoid disturbance to Pink-tailed Worm-lizard habitat Areas 2, 3, 4 and 6 by restricting disturbance to areas presented on **Figure 2.1**. Disturbance is to be limited to 25.5ha of good and 9.8ha of medium quality habitat.	Ongoing.
	9.4	Clearly mark areas of ground disturbance prior to commencement of activities and disturbance restricted to these areas.	During site establishment phase.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
9. Terrestrial Ecology (Cont'd)			
Avoid impacts on native flora and fauna. (Cont'd)	9.5	Establish clearing procedures or protocols to identify (and avoid) disturbance to nests or roosting sites of threatened fauna. If impact is unavoidable, engage a suitably qualified and experienced ecologist to remove the animal(s) and/or nest/roosting habitat nests prior to clearing.	During site establishment phase.
	9.6	Schedule the clearing of trees between April to September, unless impracticable, to reduce risk of impact to tree dependent microchiropteran bats and birds.	Ongoing.
	9.7	Undertake all clearing of trees in accordance with a *Vegetation Clearing Protocol* (VCP) which requires that the clearing supervisor: • check all trees for the presence of nesting or roosting fauna before felling or pushing, then start tree removal immediately after visual inspection; • gradually nudge the tree that requires removal, at intermittent intervals so that any animal occupying the tree has the chance of vacating the area after the initial disturbance period; then • ensure that the felled trees are removed in accordance with the Applicant's proposed timber management strategy (see Section 2.3.2.2) within two weeks.	Ongoing.
Mitigate unavoidable impacts on native flora and fauna.	9.8	Clear sufficient vegetation for the subsequent 12 months of mining operation only.	Ongoing.
	9.9	Directly transfer stripped soil materials onto rehabilitation areas where practicable.	Ongoing.
	9.10	Undertake a program of weed control prior to soil stripping activities and following re-vegetation to ensure native plants are not overgrown during their early periods of growth.	Ongoing.
	9.11	Manage tree trunks, major limbs, minor branches and other biomass from felled vegetation in accordance with the Applicant's proposed timber management strategy (see Section 2.3.2.2 of the EIS).	Ongoing.
	9.12	Erect signs to notify of the location and significance of vegetation stockpiles.	Ongoing.
	9.13	Implement an *Erosion and Sediment Control Plan* for all areas of disturbance likely to generate sediment or be subject to erosion.	Ongoing.

Table 5.1 (Cont'd)
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Desired Outcome	Action	Timing
9. Terrestrial Ecology (Cont'd)		
Mitigate unavoidable impacts on native flora and fauna. (Cont'd)	9.14 Familiarise staff undertaking pre-clearing assessments prior to the clearing campaign in order to: • ensure they understand the nature and extent of each stage of clearing; • determine what habitats are to be affected, the species which could be affected and how to manage species that may be affected by the activity; and • orientate themselves with the location, nature and extent of unaffected habitat so that they will know the best locations to release relocated fauna.	Prior to commencement of clearing campaign.
	9.15 Confine, where practicable, vehicular access to formed and marked roads and tracks.	Ongoing.
	9.16 Limit vehicle speeds within the DZP Site to limit the potential for vehicle trauma to wildlife.	Ongoing.
	9.17 Fence, as appropriate, sections of the DZP Site not required for ongoing operations to limit access by non-authorised personnel.	Following completion of clearing campaign.
	9.18 Finalise a *Pink-tailed Worm-lizard Plan of Management* and implement all management and mitigation measures with respect to: • conservation, enhancement and management of known high-quality potential habitat areas; • passive relocation of Pink-tailed Worm-lizards from the eastern half of the open cut; • assisted relocation of Pink-tailed Worm-lizards from the western half of the open cut; and • monitoring and reporting.	Prior to disturbance of Pink-tailed Worm-lizard habitat.
	9.19 Plan all bridge upgrades outside the breeding period (between August to January) to avoid nesting and breeding period of Rainbow Bee-eater. If this timing is not possible, inspect any creek bank to be affected for mouse size / snake sized horizontal holes in the expose incised creek bank.	Ongoing.
	9.20 (If suitable holes detected), commission an experienced ecologist to determine if Rainbow Bee-eaters could be affected by the activity and manage them accordingly.	As necessary.
Offset residual impacts on native flora and fauna.	9.21 Develop a *Biodiversity Offset Strategy*, in consultation with OEH, in accordance with the general strategy presented in Section 2.17.8 and **Figure 2.23**. The *Biodiversity Offset Strategy* should provide for the following. • Protection and conservation of existing remnants of native woodland and derived grassland vegetation (1 021ha). • Protection, conservation and enhancement of habitat of the Pink-tailed Worm-lizard.	Within 12 months of receipt of development consent.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
9. Terrestrial Ecology (Cont'd)			
Offset residual impacts on native flora and fauna. (Cont'd)	9.22	Establish legally binding arrangement over lands included in the *Biodiversity Offset Strategy* to for conservation of the land in perpetuity.	Within 18 months of receipt of development consent.
	9.23	Prepare an *Integrated Land Management Plan* (incorporating measures for application, measurement and management of the specific activities to be implemented as part of the *Biodiversity Offset Strategy*) in consultation with the relevant government agencies	Within 12 months of receipt of development consent.
Rehabilitate disturbed areas to create a final landform that maintains or improves biodiversity values of the Project Site.	9.24	Revegetate the DZP Site as described in Section 2.17 and in accordance with a MOP or REMP to be prepared prior to the commencement of activities on the DZP Site.	Ongoing.
	9.25	Ensure species used during rehabilitation operations are consistent with vegetation community types located within the vicinity of the area to be rehabilitated and are suitable for the proposed final landform and land use.	Ongoing.
Rehabilitate disturbed areas to create a final landform that maintains or improves biodiversity values of the Project Site. (Cont'd)	9.26	Monitor all areas of progressive and final rehabilitation and undertake remedial action in the event that rehabilitation does not comply with the relevant completion criteria.	Ongoing and as required.
	9.27	Prepare an *Integrated Land Management Plan* nominating standard and additional management actions to be undertaken on rehabilitation lands, habitat enhancement areas and the BOA.	Within 12 months of development consent.
10. Aquatic Ecology			
Avoid, minimise or mitigate impacts as a result of DZP construction activities on aquatic biota and habitats	10.1	Design and construct all new structures across watercourses in line with the *Guidelines and Policies for Aquatic Habitat Management and Fish Conservation* (NSW Fisheries 1999) and *Why do Fish Need to Cross the Road? Fish Passage Requirements for Waterway Crossings* (Fairfull & Witheridge 2003)	Prior to construction.
	10.2	Install pipelines across perennial waterways by directional drilling (under-boring) methods or possibly hung below the rail line for larger bridge crossings such as that of the Macquarie River.	During construction.
	10.3	Install pipelines across ephemeral drainage lines by trench excavation during periods of no flow within the channels and in accordance with Controlled Activities on Waterfront Land Guidelines 2012 for laying pipes and cables in watercourses on waterfront land.	During construction.
	10.4	Ensure the location of components such as the SRSF and LRSF are at least 200m from the Wambangalang Creek and 50m from other major drainage lines through the DZP Site.	Ongoing.
	10.5	Mark exclusion zones around riparian vegetation to avoid potential impacts.	Ongoing.

Table 5.1 (Cont'd)
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Desired Outcome	Action		Timing
10. Aquatic Ecology (Cont'd)			
Avoid, minimise or mitigate impacts as a result of DZP operations on aquatic biota and habitats	10.6	Exclude stock from the riparian corridor within the DZP Site.	Ongoing.
	10.7	Contain all hazardous and potentially contaminating materials within bunded areas and on impermeable surfaces.	Ongoing.
	10.8	Prevent leakage of residues or salts from SRSF, LRSF and SEC's in accordance with Commitments 8.1 to 8.13	Ongoing.
Avoid, minimise or mitigate impacts as a result of water extraction from the Macquarie River on aquatic biota and habitats	10.9	Fit the intake system with a Johnson Screen with a maximum 2mm mesh size and ideally have an approach velocity no greater than 0.4m/s.	During construction.
	10.10	Enforce pumping protocols that require pumping rates gradually increase and decrease and the commencement and cessation of pumping cycles.	Ongoing.
11. Aboriginal Heritage			
Avoid the 26 located away from the impact footprint and ensure no accidental disturbance or damage	11.1	Mark the locations of these sites on mine plans and instruct personnel to avoid these areas.	Prior to commencement of surface disturbing activities.
Manage the eleven sites located adjacent to component disturbance areas and face possible indirect impacts.	11.2	Ensure all DZP personnel are aware of the locations of Aboriginal sites and identify these sites on mine plans.	Prior to commencement of surface disturbing activities.
	11.3	Commission a suitably qualified archaeologist to revisit each site, resurvey and install temporary fencing.	
	11.4	Induct any work crews in the vicinity of any of these sites to inform them of the site's location and its legislative protection under the NPW Act. All work crews should be informed that the fenced area remains a no-go area for the duration of the works.	Prior to commencement of surface disturbing activities.
	11.5	Ensure that if at the time of construction it becomes necessary to disturb any of these sites, appropriate consultation is undertaken to develop specific management measures.	Prior to disturbance of specific site.
Monitor disturbance to one site (TS-GG-01; 36-1-0314) that could be indirectly impacted over time.	11.6	Complete regular assessments of condition.	Following commencement to the eastern half of the open cut.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action	Timing
11. Aboriginal Heritage (Cont'd)		
Manage 14 sites that occur within the impact footprint in accordance with the wishes of the RAPs	11.7 Prepare an *Aboriginal Cultural Heritage Management Plan* (ACHMP) including a Statement of Commitments with respect to the management of the identified (and any unidentified) sites. The ACHMP would incorporate the proposed management of sites included in this EIS, measures which have been reviewed by the RAPs for the Proposal.	Prior to surface disturbing activities.
	11.8 Draft and implement a Care Agreement, in consultation with the Registered Aboriginal Parties for the DZP, for the collection, salvage and management of artefacts to be disturbed.	Prior to disturbance of affected sites.
	11.9 Ensure disturbance on the DZP Site, unless appropriately cleared by the RAPs, would remain with the limit of disturbance nominated in this EIS.	Ongoing.
	11.10 Ensure if any other objects or Aboriginal sites be identified during the course of construction, the Applicant would implement an *Unanticipated Finds Protocol*, as presented in *Appendix 5* of OzArk (2013b).	As necessary.
	11.11 Include in the site induction process for all personnel Aboriginal cultural heritage as a core component.	Ongoing.
Minimise the potential for adverse Proposal-related impacts on historic heritage sites within and surrounding the DZP Site.	12.1 Identify on plans held by the Environmental Manager and Mine Surveyor, where relevant, all identified sites and ensure that activities in the vicinity of those sites are appropriately managed.	Prior surface disturbing activities.
	12.2 Avoid impacts on sites DZP-HIF1 and DZP-HIF2 by establishing a fence and buffer zone around the sites.	Ongoing.
	12.3 Ensure that unless unavoidable due to rail line upgrade, avoid DZP HS1.	Ongoing.
	12.4 Document and record sites DZP-HS2, DZP-HS3 and DZP-HS4, and provide this record to Dubbo City Council and the NSW State Archives.	Prior to dismantling.
	12.5 Ensure that if items of suspected historic heritage significance are identified throughout the life of the Proposal, implement the following procedures; 1. No further earth disturbing works would be undertaken in the vicinity of the suspected item of historic heritage significance. 2. A buffer of 20m x 20m would be established around the suspected artefact. No unauthorised entry or earth disturbance would be allowed with this buffer zone until the area has been assessed. 3. A qualified archaeologist would be contacted to make an assessment of the discovery. Mitigation procedures would then be developed and implemented based on the assessment.	Ongoing.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action		Timing
13. Soils and Land Capability			
Undertake soil stripping such that impacts on the quality of the soil for future rehabilitation is maximised.	13.1	Strip soil material to the depths identified in Section 2.3.3.3 and **Tables 2.1** and **2.2.**	Ongoing.
	13.2	Ensure that soil material to be stripped is maintained in a slightly moist condition during stripping. Material should not be stripped in either an excessively dry or wet condition.	During soil stripping.
	13.3	Grade or push soil into windrows using graders or dozers for later collection by elevating scrapers or loading into trucks by front-end loaders to minimise compaction of soil materials.	During soil stripping.
	13.4	Use soil materials immediately in areas undergoing progressive rehabilitation, where practicable. Where this is not practicable, place soil transported by truck directly into storage or place soil transported by scrapers in thick "lifts" to minimise compaction.	When areas available for rehabilitation.
	13.5	Construct the stockpiles as wind rows within each area, avoiding the construction of a single stockpile covering the entire area.	Ongoing.
	13.6	Use bulldozers or other equipment to push soil dumped by scrapers into stockpiles (to avoid tracking over previously laid soil by the scraper) whenever possible. If material is deposited directly by scrapers it should be deposited in thick "lifts" to minimise compaction.	Ongoing.
	13.7	Minimise, as far as practicable, the operation of machinery on soil stockpiles to minimise compaction.	Ongoing.
	13.8	Ensure that soil stockpiles have a maximum height of 3m for subsoil and 2m for topsoil material.	Ongoing.
	13.9	Leave the surface of the stockpile with an even but roughened surface to assist in erosion control and seed germination and emergence.	Ongoing.
	13.10	Ensure that if long term storage (>3 months) is planned, fertilise and establish an appropriate vegetative cover as soon as possible on all soil stockpiles to be retained for more than 3 months.	On storage of soil for > 3 months.
	13.11	Ensure that where practical and when conditions are suitable, occasional grazing on the vegetated stockpiles is undertaken to encourage natural return of organic material, e.g. manure.	Ongoing.
	13.12	Cease grazing on stockpiles when the soil is wet enough that stock impact on the soil structure.	As necessary.
	13.13	Remove livestock when groundcover is less than 60% to encourage survival and growth of the pasture species.	As necessary.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action	Timing
13. Soils and Land Capability (Cont'd)		
Undertake soil stockpiling such that impacts on the quality of the soil for future rehabilitation is maximised. (Cont'd)	13.14 Test the subsoil to ensure that it is not toxic to plant growth.	Prior to soil respreading.
	13.15 Ensure that subsoil to be worked is moist, or dry but not wet.	
	13.16 Form sub-grade to desired shape prior to application of subsoil.	
	13.17 Tine sub-grade (approximately 60cm deep) to provide an undulating boundary and disrupt barriers to water movement from compaction.	
	13.18 Place subsoil to achieve similar density (or slightly less) than natural subsoil.	
	13.19 Lightly tine the surface between lifts to reduce creation of slowly permeable layers.	
	13.20 Test the topsoil prior to respreading to determine the ameliorants required to achieve the desired level of plant growth.	
	13.21 Tine the surface of underlying subsoil material below the depth of compaction to minimise formation of a dense layer at the top the subsoil / growth material.	
	13.22 Ensure that topsoil is not respread when either excessively dry or wet.	
	13.23 Place the soil material with only a few lifts from an elevating scraper or similar with sufficient regrading to create a density similar to natural soil.	During respreading.
	13.24 Minimise, as far as practicable, the operation of machinery / vehicles on respread topsoil material to minimise compaction.	Following respreading.
	13.25 Establish vegetation on topsoiled areas as quickly as possible to minimise the risk of erosion from wind or water.	
14. Traffic and Transportation		
Achieve safe and efficient transport operations.	14.1 Prepare and implement a *Construction Traffic Management Plan*.	Prior to commencement of construction activities.
	14.2 Prepare and implement a *Code of Conduct* for contractors / employees travelling to and from the Site.	Prior to commencement of construction activities. Review annually.
	14.3 Construct all road and intersection upgrades in accordance with Austroads Standards and Council specifications with suitable dimensional capacity to accommodate the anticipated oversized loads.	During road upgrading works.
	14.4 Undertake regular discussions with school bus company(ies) to ensure that information regarding school bus routes, times and pick-up / drop-off locations remains up to date.	At least annually.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action		Timing
14. Traffic and Transportation (Cont'd)			
Achieve safe and efficient transport operations. (Cont'd)	14.5	Consult with organisers of "Zoo to Zoo" road cycling and other annual event organisers to minimise impacts on construction activities, mine operations and the events.	At least annually.
	14.6	Schedule shift changes to avoid peak traffic periods by at least 1 hour	Ongoing.
	14.7	Where possible, schedule trains outside the peak traffic periods (8:00am to 9:00am and 3:00pm to 4:00pm) to reduce the impact of traffic delays at rail crossings.	Ongoing.
	14.8	Consult with the relevant cycling groups to provide specific consideration of safety aspects associated with their use of the road, particularly where sight distance is limited.	Prior to and during construction / road upgrade activities.
15. Visual Amenity			
Manage the impact of activities on the visual amenity surrounding the DZP Site.	15.1	Design Stockpile Area 1 (refer to **Figure 2.6**) to run along the western side of the rail easement and vegetate with fast growing tree species to create a vegetated amenity bund.	Prior to placement of soil within Stockpile Area 1.
	15.2	Progressively rehabilitate the outer embankments of the LRSF, SRSF, WRE and Salt Encapsulation Cells.	Ongoing.
	15.3	Complete enhancement of native vegetation across and surrounding the DZP Site (see Section 2.17.8).	Within 5 years of development consent.
	15.4	Construct the processing plant and other infrastructure within the DZP Site from non-reflective, neutral coloured material.	During construction.
	15.5	Select and place permanent and temporary lights that are directed downwards and towards the activity area, i.e. not outward from the DZP Site.	Ongoing.
	15.6	Consider any reasonable request by a potentially affected resident for assistance to create a visual screen adjacent to their residence through planting of fast growing vegetation and/or landscaping, where such a screen would effectively reduce the visual impact of activities during the life of the Proposal.	Ongoing.
16. Hazards			
Prevent the escape of reagents from the Processing Plant and DZP Site Administration Area.	16.1	Store all chemicals within concrete bunded areas.	Ongoing.
	16.2	Complete all tanker deliveries over sealed areas with kerbing and drainage design preventing any runoff to the environment if a spill occurs.	Ongoing.
	16.3	Provide spill kits as appropriate, enabling recovery of small quantities of spilt materials.	Ongoing.
Manage a local bush fire to minimise the potential for property damage or personnel injury.	16.4	Maintain an Asset Protection Zone (APZ) of at least 50m around the open cut.	Ongoing.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action	Timing
16. Hazards (Cont'd)		
Manage a local bush fire to minimise the potential for property damage or personnel injury. (Cont'd)	16.5 Monitor fuel loads within the APZ and reduce as required, i.e. no re-growth of shrub or tree vegetation would be allowed, grass growth would be monitored and cut back as necessary. (Specialist advice would be sought, either from the NSW RFS or Council in relation to appropriate fuel load management within the APZ.)	At least annually.
	16.6 Maintain the internal haul road to ensure safe access and egress from the open cut in the event evacuation is called.	Ongoing.
	16.7 Maintain accessibility to the water infrastructure within the Processing Plant Area for management of ember attack on the buildings of the Processing Plant and DZP Site Administration Area.	Ongoing.
	16.8 Provide training to site personnel in relation to specific fire fighting tasks and procedures	Annually.
	16.9 Develop Emergency and Evacuation Management Procedures.	Prior to commencement of operations.
	16.10 (In the event of a local bush fire event), require all personnel to assemble at the designated Emergency Assembly Area and complete a head count to confirm all site personnel and visitors are accounted for.	As necessary.
Minimise risks associated with initiation of a bush fire within the DZP Site.	16.11 Ensure refuelling is undertaken within designated fuel bays or within cleared area of the DZP Site.	Ongoing.
	16.12 Ensure vehicles are turned off during refuelling.	Ongoing.
	16.13 Ensure no smoking policy is enforced in designated areas of the DZP Site.	Ongoing.
	16.14 Ensure fire extinguishers are maintained within site vehicles and refuelling areas.	Ongoing.
	16.15 Ensure a focus on housekeeping by DZP management.	Ongoing.
	16.16 Ensure that a water cart is available to assist in extinguishing any fire ignited.	Ongoing.
Reduce residual risks of traffic accidents on roads used by Proposal related traffic.	16.17 Erect Give Way signs at the exit of the Site to Toongi Road.	Prior to commencement of construction.
	16.18 Advise all truck drivers of the potential conflict between Proposal-related traffic and the general public.	As part of induction process or contract negotiation.
	16.19 Prepare and require contracted truck drivers (or Company representatives) to sign a *Driver's Code of Conduct* identifying minimum standards for driver behaviour.	As part of induction process or contract negotiation.
	16.20 Implement a comprehensive *Transport Management Plan* for construction and DZP operation.	Prior to commencement of construction deliveries.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action		Timing
16. Hazards (Cont'd)			
Avoid conflict between aircraft and stacks of the processing plant	16.21	Consult with the relevant government agencies with respect to specifications of the 90m ventilation stack and implement any required visual or other identifiers, e.g. flashing light.	Prior to commencement of construction of the stack.
17. Social-economic Setting			
Maximise the positive impacts and minimise any actual or perceived adverse impacts on the social fabric or facilities available to the community surrounding the DZP Site.	17.1	Engage the community surrounding the Proposal in regular dialogue in relation to the proposed and ongoing operation of the Project and maintain an "open door" policy for any member of the community who wishes to discuss any aspect of the DZP.	Ongoing.
	17.2	Proactively and regularly consult with those residents most likely to be adversely impacted by the DZP.	Ongoing.
	17.3	Continue to support community organisations, groups and events, as appropriate, and review any request by a community organisation for support or assistance throughout the life of the DZP.	Ongoing.
	17.4	Consult with residences adjoining the Toongi-Dubbo Rail Line to ensure that all reasonable expectations related to local amenity are met, e.g. fencing or no fencing of the rail easement along Margaret Crescent.	Prior to construction of the rail line.
	17.5	Implement a comprehensive and targeted *Environmental Monitoring Program*, provide the local community with access to the results of monitoring and use these results, in consultation with the local community, to improve environmental performance at the DZP Site.	Within 6 months of development consent.
	17.6	Give preference when engaging new employees, where practicable, to candidates who live within the Dubbo Local Government Area over candidates with equivalent experience and qualifications based elsewhere and ensure that the mining and other contractors do so as well. An objective for 85% of start-up employees to be sourced from the Dubbo LGA and immediate surrounds has been adopted.	Ongoing.
	17.7	Encourage the involvement of the local Aboriginal community in the workforce.	Ongoing.
	17.8	Encourage and support participation of locally based employees and contractors in appropriate training or education programs that would provide skills and qualifications that may be of use following completion of the DZP.	Ongoing.
	17.9	Enter into an agreement with Dubbo City Council, possibly in the form of a *Voluntary Planning Agreement* (VPA) after assessing net project impacts/costs to Council.	Prior to commencement of operations.

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action	Timing
17. Social-economic Setting (Cont'd)		
Maximise the positive impacts and minimise any actual or perceived adverse impacts on the social fabric or facilities available to the community surrounding the DZP Site. (Cont'd)	17.10 Ensure that infrastructure and services installed for the Proposal, including the gas pipeline, electricity transmission line, appropriate buildings and hardstand areas, remain available for alternative uses following completion of the Proposal	Post-Proposal.
	17.11 Maintain agricultural operations on land not required for active mining or biodiversity offsetting purposes.	Ongoing.
	17.12 Undertake final landform construction and rehabilitation as nominated in Section 2.17 (so as to return all but 1 200ha of the DZP Site to agricultural production post-DZP).	Ongoing.
Maintain ongoing consultation with the local community and Council.	17.13 Form and maintain a Community Consultative Committee (CCC), including representative members of the community and Dubbo City Council.	Within 6 months of receipt of development consent.
	17.14 Regularly brief the CCC on activities within the DZP Site and seek feedback in relation to Proposal-related impacts whether real or perceived.	As necessary.
Respond to environmental complaints.	17.15 Establish and maintain an environmental complaints line and register of complaints in accordance with the requirements of the Environment Protection Licence, once issued.	Within 6 months of receipt of development consent.
	17.16 Respond promptly to any issue of concern or complaint raised by the community or a government agency.	Ongoing.
18. Waste		
Manage waste appropriately on the DZP Site.	18.1 Maintain a register of the types and quantities of wastes produced on the DZP Site.	Ongoing.
	18.2 Design and maintain storage areas to contain spillages.	
	18.3 Segregate and retain recyclable and non-recyclable waste in designated storage areas prior to removal from the DZP Site.	
	18.4 Keep the DZP Site in a clean and tidy condition.	
	18.5 Ensure waste is regularly removed from the DZP Site by a licensed contractor.	
Manage potentially restricted or hazardous waste and/or dangerous goods appropriately	18.6 Classify all wastes to be disposed of in accordance with the NSW Waste Classification Guidelines. Restricted or hazardous wastes would not leave the DZP Site without obtaining prior EPA approval.	Ongoing.
	18.7 Clean used bulky bags, drums and pallets within the relevant covered and bunded storage areas in accordance with the product MSDS or relevant Australian Standard.	
	18.8 Complete a visual (or other required) inspection to confirm any remnant reagent has been removed.	
	18.9 Remove waste materials from the DZP Site by licensed waste removal contractor to the Dubbo City Council landfill site.	

Table 5.1 (Cont'd)
Draft Statement of Commitments

Desired Outcome	Action		Timing
19. Environmental Management System			
A systematic set of documents are in place to guide the planning and implementation of all environmental management strategies.	19.1	Incorporate the environmental procedures in an on-site management system.	Prior to relevant activity.
	19.2	Prepare or update the following monitoring programs, management plans and protocols. • Environmental Monitoring Program. • Dose Assessment Monitoring Program. • Environmental Radiation Monitoring Program. • Mining Operations Plan (or equivalent). • Integrated Land Management Plan. • Noise Management Plan (incorporating a Noise Monitoring Program). • Blast Management Plan (incorporating a Blast Monitoring Program). • Air Quality Management Plan (incorporating an Air Quality Monitoring Program). • Water Management Plan. • Erosion & Sediment Control Plan(s). • Aboriginal Cultural Heritage Management Plan. • Construction Traffic Management Plan. • Transport Management Plan. • Pink-tailed Worm-lizard Plan of Management. • Vegetation Clearing Protocol. • Cell and Liner Construction Protocol. • Liner Integrity Testing Protocol. • Leak Detection Response Strategy. • Salt Harvesting Protocol. • Driver Code of Conduct.	Various and as nominated by development consent.
	19.3	Incorporate relevant environmental data / information in *Annual Reviews*.	Annually.

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