

Kerry Smeltzer

From: Rebecca Lincoln
Sent: Tuesday, 26 March 2013 3:02 PM
To: Executive Services; Gemma Sheahan
Subject: FW: Correspondence from Coordinator-General DGBN13/102
Attachments: DGBN13_102.pdf

FYI - sent to [Sch. 4(4)(6) - Discl] today.

Thanks

Rebecca

From: Rebecca Lincoln
Sent: Tuesday, 26 March 2013 2:56 PM
To: [Sch. 4(4)(6) - Disclosing personal information]
Subject: Correspondence from Coordinator-General DGBN13/102

Good afternoon [Sch. 4(4)(6) - Discld]

Please see **attached** letter from Mr Barry Broe, Coordinator-General.

A hard copy along with the attachments mentioned in the letter will be posted to you.

Please confirm receipt of this by return email.

Kind regards,

Rebecca Lincoln
Executive Officer - Coordinator-General's Directorate
Department of State Development, Infrastructure and Planning
p. 07 3225 1802 (ext 51802)
e. rebecca.lincoln@coordinatorgeneral.qld.gov.au . www.dsdip.qld.gov.au
Please consider the environment before printing this email



Queensland
Government

Office of the
Coordinator-General

Our ref: DGBN13/102

26 MAR 2013

Sch. 4(4)(6) - Disclosing persona

Chief Executive Officer - Australia
Adani Mining Pty Ltd
GPO Box 2569
BRISBANE QLD 4001

Dear Sch. 4(4)(6) - Disclo

I refer to the environmental impact statement (EIS) for the Carmichael Coal Mine and Rail project being assessed under Part 4 of the *State Development and Public Works Organisation Act 1971* (the Act), which was released for public and advisory agency comment from 15 December 2012 to 11 February 2013.

Copies of the 67 general submissions and 14 396 online-facilitated submissions received on the EIS were provided to Adani Mining Pty Ltd and to the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (SEWPaC).

I have concluded my review of all the submissions received on the EIS, and in accordance with section 35(2) of the Act, I seek supplementary information to satisfy requirements of the project's EIS terms of reference and complete the evaluation of the project.

Can you please provide a supplementary environmental impact statement report (SEIS), that addresses the feedback and direction provided by the Office of the Coordinator-General in the EIS Submission Analysis Register (copy enclosed, Attachment A).

In order to clearly identify what is expected within the SEIS, please also find attached:

- further information on the requirements for the SEIS (Attachment B)
- further information relating to rail ERA approvals (Attachment C)
- clarification of SEWPaC requirements for the SEIS (Attachment D)
- clarification of requirements for social impact matters (Attachment E)
- an analysis of online-facilitated submissions received, advising what response is required from Adani Mining Pty Ltd (Attachment F)

Yours sincerely

Barry Broe
Coordinator-General

Enc (6)

PO Box 15517 City East
Queensland 4002 Australia
Telephone +61 7 3227 8548
Facsimile +61 7 3224 4683
Website www.dsdip.qld.gov.au
ABN 25 166 523 889

s. 73(2) - Not relevant/ Out of scope

21	Macmines Austasia P/L	Organisation	21A	Draft Offset Strategy	proposed offset areas	The proposed Draft Offset Strategy includes an assessment of the offset potential of the Moray Downs property. The EIS states that Moray Downs may meet a significant portion of the project offset requirements for a number of protected flora and fauna species. A portion of the Project China Stone proposed Mining Lease Application (MLA) area overlies the Moray Downs property. Attached Figures 2-4 show the location of the Project China Stone proposed MLA area, in relation to the areas of Moray Downs which were assessed for potential offsets. The securing of offsets within land underlying the Project China Stone proposed MLA area will have a significant impact on the viability of the project.	Macmines request that no offset areas are secured or approved on land underlying the proposed Project China Stone MLA area. The securing of such offsets would significantly constrain the proposed mining activities within the MLA area and is likely to make the project not economically viable.	Volume 1, Section 9: Draft Offsets Strategy; and Appendix AH: Carmichael Coal Mine and Rail Project Environmental Offset Strategy	Y	The revised offsets strategy will need to take into account the land proposed for the China Stone project and its mining lease.
21	Macmines Austasia P/L	Organisation	21B	Transport	Road impacts	Road access to the Carmichael (Coal Mine) Project site is via approximately 90 km of unsealed council roads, including Moray-Carmichael Road and Elgin-Moray Road, which link the project site to the Gregory Development Road. The EIS states that as the Moray-Carmichael Road passes through the proposed mine footprint, it will need to be temporarily realigned while mining takes place in the central part of the mine (refer to attached Figure 5). Once rehabilitation in this area is completed, Adani propose to establish a permanent road alignment established as close as possible to the existing alignment. Road access to the Project China Stone proposed MLA area is via the same unsealed council roads, including Moray-Carmichael Road, and this route will likely be the primary access for project-related vehicular traffic. As such, any proposed realignment of Moray-Carmichael Road or the other unsealed council roads along this route, may affect access to the Project China Stone site.	Macmines request that any proposed realignment of Moray-Carmichael Road, or other unsealed council roads which provide access to the two projects, takes into account the use of the roads for access to the Project China Stone site. In particular, access to the Project China Stone site must be maintained at all times. Macmines will commence discussions with Adani regarding the road upgrade and realignment, and request to be involved in any decisions on such.	Volume 2, Section 2: Description of the Project Volume 2, Section 11.3 - transport	N	A matter for discussion between Adani and Macmines.
21	Macmines Austasia P/L	Organisation	21C	Introduction	Relationship to other projects	Adani is in discussions with the Coordinator General regarding a declaration of land relating to the Carmichael (Rail) Project as a State Development Area (SDA) under the SDPWO Act. Mac Mines is currently engaged in discussions with Adani in relation to cooperation on an integrated rail alignment which needs to include a direct connection to the Project China Stone project site. The current proposed Project China Stone off-lease rail alignment traverses the northern end of the Carmichael (Coal) Project site. Macmines will require access to the proposed rail alignment within the proposed Carmichael MLA to ensure the viability of the project.	Macmines request that if the Coordinator General intends to declare a SDA over land relating to the Adani rail alignment, that the proposed Macmines alignment is also included in this declaration to ensure the viability of the project.	Volume 4, Appendix D: Project Approvals and Planning Assessment	N	For the Coordinator-General's consideration at a later time, this is outside the scope of the Carmichael EIS

s. 73(2) - Not relevant/ Out of scope

Sub. No	Submitter Type	Title	First Name	Surname	Job Title	Division	Department / Organisation	Street 1	Street 2	PO Box	City / State/ Postcode	Contact	Email
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Advisory Agency submitters

s. 73(2) - Not relevant/ Out of scope

s. 73(2) - Not relevant/ Out of scope

Non-agency submitters

s. 73(2) - Not relevant/ Out of scope

21	Organisation	Mr	Russell N	Phillips	Chief Executive Officer		Macmines Austasia Pty Ltd	Suite 17, Level 9 Christie Building 320 Adelaide St			BRISBANE QLD 4000		CBrown@hanse nbailey.com.au

s. 73(2) - Not relevant/ Out of scope

s. 73(2) - Not relevant/ Out of scope

Carmichael Coal Mine and Rail project Supplementary information requirements:
Further information for providing a supplementary environmental impact statement report (SEIS)

If a submission point is specifically mentioned in the EIS Submissions Analysis Register ('Register', refer attachment A) as requiring further treatment in the 'Direction to proponent/reason for OCG decision' section of the analysis, then the 'Response to issues raised in submissions' section of the SEIS is to discuss the topic.

As detailed in the Register, key deliverables to be provided in the SEIS to satisfy requirements of the project's EIS Terms of Reference include, but are not limited to:

- revised mine plan including detail on design and location of regulated structures and incorporating outputs from further exploration and geotechnical investigations (including waste rock characterisation)
- revised Environmental Management Plan (EMP) for the mine accounting for additional work undertaken, including:
 - a draft Rehabilitation Plan detailing rehabilitation principles and objectives
 - a Subsidence Management Plan
 - *updated water balance
 - *updated work on water quality for proposed mine water discharge
 - updated work on soil surveys and management
 - further development of Black-throated Finch (BTF) work
- *revised groundwater model accounting for additional investigations undertaken since the EIS was prepared including updated modelled impacts on Great Artesian Basin (GAB) springs and Mellaluka Springs
- *revised surface water hydraulic modelling for the mine accounting for revised mine plan and watercourse determination, including updated flood modelling
- revised offsets strategy further development of BTF work
- revised cumulative impact assessment
- revised social impact material
- updated rail flood modelling work
- report on impacts of rail line on pastoral properties
- revised EMP for off mining lease infrastructure accounting for further project design, additional ecological surveys and additional soils surveys.
- updated report for Matters of National Environmental Significance (MNES) accounting for updated work (refer also to Attachment D)

*Note: these deliverables should include sufficient information to satisfy the information requirements of the Independent Expert Scientific Committee (IESC) as stated in the *IESC Information Guidelines for Proposals Relating to the Development of Coal Seam Gas and Large Coals Mines where there is a Significant Impact on Water Resources* (February 2013).

In relation to advisory agencies' submissions, it is recommended that Adani contacts the relevant agency to ensure that all matters are addressed to the extent required by the agency. It is suggested that Adani provides each agency with a draft of how it is intended to address its submission prior to finalising the SEIS.

Carmichael Coal Mine and Rail project Supplementary information requirements:
Further information for providing a supplementary environmental impact statement report (SEIS)

The SEIS will need to include a table of all matters raised in submissions on the EIS with responses to each issue, or a cross-reference to where each issue is addressed in the SEIS. Such a table should be clear and of sufficient detail to allow a submitter to find the relevant response.

The attached Register (Attachment A), with the 'Proponent's response: action taken' column is to be completed with clear reference to where the SEIS has addressed each comment. This is to be provided to the Office of the Coordinator-General with the SEIS.

OCG Staff have commenced drafting the EIS evaluation report required under section 35 of the *State Development and Public Works Organisation Act (1971)*. As that process proceeds, further information needs may be identified.

Key issues to address in the SEIS include further information required on the matters as detailed below.

1) General requirements

Project approvals

- a) Provide a clear statement on whether Adani is seeking a complete list of draft Environmental Authority (EA) conditions to be stated within the Coordinator-General's Evaluation Report (CGER) for the Mine component of this project
- b) Provide a list of approvals under the *Water Act 2000* for which conditions will be sought within the CGER for regulated structures located on the mine site
- c) Following waterway determination in consultation with DNRM, provide riparian vegetation assessment and aquatic ecology assessment for any watercourses identified onsite (as defined under the *Water Act 2000*) that are predicted to be impacted/diverted.
- d) Provide a list of:
 - I) Approvals under the *Water Act 2000* for which conditions will be sought within the CGER for the off lease infrastructure components of this project
 - II) Environmentally Relevant Activity (ERA) approvals for which stated conditions will be sought within the Coordinator-General's Evaluation Report (CGER) for the off lease infrastructure components of this project
 - III) ERA approvals for which stated conditions will be sought within the Coordinator-General's Evaluation Report (CGER) for the rail infrastructure component of this project.

2) Project changes

- a) Provide a revised mine plan, based on updated exploration and geotechnical information and completed waterway determination (in consultation with DNRM), including responses regarding:
 - I) Water storages
 - II) Flood levees
 - III) Watercourse diversions
 - IV) Waste generation and management; including updated waste rock characterisation
- b) Provide a revised water balance model with discussions of any updates to the water supply strategy for the project.

Pages 9 through 12 redacted for the following reasons:

s. 73(2) - Not relevant/ Out of scope

**Carmichael Coal Mine and Rail project Supplementary information
requirements:
Further information relating matters of national environmental significance**

Since providing its initial advice on 12 December 2012, the Department of Sustainability, Environment, Water, Population and Communities, (the department) has continued to provide advice on the adequacy of the draft EIS. Some of this advice was provided directly to Adani through a meeting held on 7 February 2013.

The following information expands on the issues discussed between the department and Adani at the 7 February 2013 meeting.

Refinement of project description

The department requested that the proponent clarify all components of the project to ensure there is no ambiguity between elements that are in the referred action and subject to assessment, and those components that are not. An example is the borrow pits, which the proponent has indicated are not subject to this assessment and may require assessment on a separate approval path. The proponent agreed to provide a statement to the department delineating the elements of the project that are to be assessed and those that are not.

s. 73(2) - Not relevant/ Out of scope

Pages 14 through 38 redacted for the following reasons:

s. 73(2) - Not relevant/ Out of scope

Kerry Smeltzer

From: Rebecca Lincoln
Sent: Wednesday, 27 March 2013 9:37 AM
To: 'Terri.English@environment.gov.au'; 'cyn.piscitelli@enviornment.gov.au'
Subject: Correspondence from the Coordinator-General DGBN13/102
Attachments: DGBN13_102 Mr David Calvert.pdf; DGBN13_102.pdf

Good morning Terri and Cyn

In Mr Calvert's absence, please see attached letter from Mr Barry Broe, Coordinator-General.

Could you please confirm receipt by return email.

Thank you.

Kind regards,
Rebecca Lincoln
Executive Officer - Coordinator-General's Directorate
Department of State Development, Infrastructure and Planning
p. 07 3225 1802 (ext 51802)
e. rebecca.lincoln@coordinatorgeneral.qld.gov.au . www.dsdip.qld.gov.au
Please consider the environment before printing this email

From: Rebecca Lincoln
Sent: Wednesday, 27 March 2013 9:22 AM
To: 'David.Calvert@environment.gov.au'
Subject: Correspondence from the Coordinator-General DGBN13/102

Good morning Mr Calvert

Please see **attached** letter from Mr Barry Broe, Coordinator-General. Also **attached** is the request to Adani for your reference.

A hard copy will be posted to you today.

Please confirm receipt of this by return email.

Kind regards

Rebecca Lincoln
A/Executive Officer
Coordinator-General's Directorate
**Department of State Development,
Infrastructure and Planning
Queensland Government**
tel + 61 7 3225 1802 (ext 51802)
post PO Box 15517 City East Queensland 4002
visit Level 12, 100 George Street Brisbane
rebecca.lincoln@coordinatorgeneral.qld.gov.au
www.dsdip.qld.gov.au
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Office of the
Coordinator-General

Our ref: DGBN13/102

26 MAR 2013

Mr David Calvert
Acting Assistant Secretary
Queensland and South Australia Assessment Branch
Department of Sustainability, Environment, Water, Population and Communities
GPO Box 787
CANBERRA ACT 2601

Dear Mr Calvert

I refer to the environmental impact statement (EIS) for the Carmichael Coal Mine and Rail Project being assessed under Part 4 of the *State Development and Public Works Organisation Act 1971* (the Act), which was released for public and advisory agency comment from 15 December 2012 to 11 February 2013. The EIS process for this project is being managed under the bilateral agreement between the Queensland and Australian Governments

A total of 67 general submissions and 14 396 online-facilitated submissions were received on the EIS. These have been previously provided to Adani Mining Pty Ltd and to the Commonwealth Department of Sustainability, Environment, Water, Population and Communities (SEWPaC).

I have concluded my review of all submissions received on the EIS and in accordance with section 35(2) of the Act, I have requested Adani Mining Pty Ltd provide supplementary information to complete the evaluation of the EIS for the project. A copy of my request to Adani Mining Pty Ltd is enclosed for your information.

The request to Adani Mining Pty Ltd for supplementary information includes SEWPaC requirements as confirmed in your correspondence of 19 March 2013.

Yours sincerely

Barry Broe
Coordinator-General

Enc.

PO Box 15517 City East
Queensland 4002 Australia
Telephone +61 7 3227 8548
Facsimile +61 7 3224 4683
Website www.dsdlp.qld.gov.au
ABN 25 166 523 889



Queensland
Government

Office of the
Coordinator-General

Our ref: DGBN13/102

26 MAR 2013

Sch. 4(4)(6) - Disclosing person

Chief Executive Officer - Australia
Adani Mining Pty Ltd
GPO Box 2569
BRISBANE QLD 4001

Dear

Sch. 4(4)(6) - Disc

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In order to clearly identify what is expected within the SEIS, please also find attached:

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Yours sincerely

Barry Broe
Coordinator-General

Enc (6)

PO Box 15517 City East
Queensland 4002 Australia
Telephone +61 7 3227 8548
Facsimile +61 7 3224 4683
Website www.dsdip.qld.gov.au
ABN 25 166 523 889

s. 73(2) - Not relevant/ Out of scope

21	Macmines Austasia P/L	Organisation	21A	Draft Offset Strategy	proposed offset areas	The proposed Draft Offset Strategy includes an assessment of the offset potential of the Moray Downs property. The EIS states that Moray Downs may meet a significant portion of the project offset requirements for a number of protected flora and fauna species. A portion of the Project China Stone proposed Mining Lease Application (MLA) area overlies the Moray Downs property. Attached Figures 2-4 show the location of the Project China Stone proposed MLA area, in relation to the areas of Moray Downs which were assessed for potential offsets. The securing of offsets within land underlying the Project China Stone proposed MLA area will have a significant impact on the viability of the project.	Macmines request that no offset areas are secured or approved on land underlying the proposed Project China Stone MLA area. The securing of such offsets would significantly constrain the proposed mining activities within the MLA area and is likely to make the project not economically viable.	Volume 1, Section 9: Draft Offsets Strategy; and Appendix AH: Carmichael Coal Mine and Rail Project Environmental Offset Strategy	Y	The revised offsets strategy will need to take into account the land proposed for the China Stone project and its mining lease.
21	Macmines Austasia P/L	Organisation	21B	Transport	Road impacts	Road access to the Carmichael (Coal Mine) Project site is via approximately 90 km of unsealed council roads, including Moray-Carmichael Road and Elgin-Moray Road, which link the project site to the Gregory Development Road. The EIS states that as the Moray-Carmichael Road passes through the proposed mine footprint, it will need to be temporarily realigned while mining takes place in the central part of the mine (refer to attached Figure 5). Once rehabilitation in this area is completed, Adani propose to establish a permanent road alignment established as close as possible to the existing alignment. Road access to the Project China Stone proposed MLA area is via the same unsealed council roads, including Moray-Carmichael Road, and this route will likely be the primary access for project-related vehicular traffic. As such, any proposed realignment of Moray-Carmichael Road or the other unsealed council roads along this route, may affect access to the Project China Stone site.	Macmines request that any proposed realignment of Moray-Carmichael Road, or other unsealed council roads which provide access to the two projects, takes into account the use of the roads for access to the Project China Stone site. In particular, access to the Project China Stone site must be maintained at all times. Macmines will commence discussions with Adani regarding the road upgrade and realignment, and request to be involved in any decisions on such.	Volume 2, Section 2: Description of the Project Volume 2, Section 11.3 - transport	N	A matter for discussion between Adani and Macmines.
21	Macmines Austasia P/L	Organisation	21C	Introduction	Relationship to other projects	Adani is in discussions with the Coordinator General regarding a declaration of land relating to the Carmichael (Rail) Project as a State Development Area (SDA) under the SDPWO Act. Mac Mines is currently engaged in discussions with Adani in relation to cooperation on an integrated rail alignment which needs to include a direct connection to the Project China Stone project site. The current proposed Project China Stone off-lease rail alignment traverses the northern end of the Carmichael (Coal) Project site. Macmines will require access to the proposed rail alignment within the proposed Carmichael MLA to ensure the viability of the project.	Macmines request that if the Coordinator General intends to declare a SDA over land relating to the Adani rail alignment, that the proposed Macmines alignment is also included in this declaration to ensure the viability of the project.	Volume 4, Appendix D: Project Approvals and Planning Assessment	N	For the Coordinator-General's consideration at a later time, this is outside the scope of the Carmichael EIS

s. 73(2) - Not relevant/ Out of scope

Carmichael Coal Mine and Rail project Supplementary information requirements:
Further information for providing a supplementary environmental impact statement report (SEIS)

If a submission point is specifically mentioned in the EIS Submissions Analysis Register ('Register', refer attachment A) as requiring further treatment in the 'Direction to proponent/reason for OCG decision' section of the analysis, then the 'Response to issues raised in submissions' section of the SEIS is to discuss the topic.

As detailed in the Register, key deliverables to be provided in the SEIS to satisfy requirements of the project's EIS Terms of Reference include, but are not limited to:

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*Note: these deliverables should include sufficient information to satisfy the information requirements of the Independent Expert Scientific Committee (IESC) as stated in the *IESC Information Guidelines for Proposals Relating to the Development of Coal Seam Gas and Large Coals Mines where there is a Significant Impact on Water Resources* (February 2013).

In relation to advisory agencies' submissions, it is recommended that Adani contacts the relevant agency to ensure that all matters are addressed to the extent required by the agency. It is suggested that Adani provides each agency with a draft of how it is intended to address its submission prior to finalising the SEIS.

Pages 44 through 48 redacted for the following reasons:

s. 73(2) - Not relevant/ Out of scope

**Carmichael Coal Mine and Rail project Supplementary information
requirements:
Further information relating matters of national environmental significance**

Since providing its initial advice on 12 December 2012, the Department of Sustainability, Environment, Water, Population and Communities, (the department) has continued to provide advice on the adequacy of the draft EIS. Some of this advice was provided directly to Adani through a meeting held on 7 February 2013.

The following information expands on the issues discussed between the department and Adani at the 7 February 2013 meeting.

Refinement of project description

The department requested that the proponent clarify all components of the project to ensure there is no ambiguity between elements that are in the referred action and subject to assessment, and those components that are not. An example is the borrow pits, which the proponent has indicated are not subject to this assessment and may require assessment on a separate approval path. The proponent agreed to provide a statement to the department delineating the elements of the project that are to be assessed and those that are not.

s. 73(2) - Not relevant/ Out of scope

Pages 50 through 99 redacted for the following reasons:

s. 73(2) - Not relevant/ Out of scope

Submitter no.	Submitter	Category	Sub-category	Issue - Details	Submitter Recommendations / Suggested Mitigation	Relevant EIS Section	Action required? (Y/N)	Previous Direction to Proponent	Proponent response (provided August 2013)	Present in DSEIS?	SEIS Section	Further Direction/Comments
s. 73(2) - Not relevant/ Out of scope												
21	Macmines Austasia P/L	Draft Offset Strategy	proposed offset areas	<p>The proposed Draft Offset Strategy includes an assessment of the offset potential of the Moray Downs property. The EIS states that Moray Downs may meet a significant portion of the project offset requirements for a number of protected flora and fauna species.</p> <p>A portion of the Project China Stone proposed Mining Lease Application (MLA) area overlies the Moray Downs property.</p> <p>Attached Figures 2-4 show the location of the Project China Stone proposed MLA area, in relation to the areas of Moray Downs which were assessed for potential offsets.</p> <p>The securing of offsets within land underlying the Project China Stone proposed MLA area will have a significant impact on the viability of the project.</p>	MacMines request that no offset areas are secured or approved on land underlying the proposed Project China Stone MLA area. The securing of such offsets would significantly constrain the proposed mining activities within the MLA area and is likely to make the project not economically viable.	Volume 1, Section 9: Draft Offsets Strategy; and Appendix AH: Carmichael Coal Mine and Rail Project Environmental Offset Strategy	Y	The revised offsets strategy will need to take into account the land proposed for the China Stone project and its mining lease.	Adani will consult with China Stone during the finalisation of the offset plan. Please refer to the revised Offsets Report in SEIS Volume 4 Appendix F.			
21	Macmines Austasia P/L	Transport	Road impacts	<p>Road access to the Carmichael (Coal Mine) Project site is via approximately 90 km of unsealed council roads, including Moray-Carmichael Road and Elgin-Moray Road, which link the project site to the Gregory Development Road. The EIS states that as the Moray-Carmichael Road passes through the proposed mine footprint, it will need to be temporarily realigned while mining takes place in the central part of the mine (refer to attached Figure 5). Once rehabilitation in this area is completed, Adani propose to establish a permanent road alignment established as close as possible to the existing alignment.</p> <p>Road access to the Project China Stone proposed MLA area is via the same unsealed council roads, including Moray-Carmichael Road, and this route will likely be the primary access for project-related vehicular traffic. As such, any proposed realignment of Moray-Carmichael Road or the other unsealed council roads along this route, may affect access to the Project China Stone site.</p>	MacMines request that any proposed realignment of Moray-Carmichael Road, or other unsealed council roads which provide access to the two projects, takes into account the use of the roads for access to the Project China Stone site. In particular, access to the Project China Stone site must be maintained at all times. MacMines will commence discussions with Adani regarding the road upgrade and realignment, and request to be involved in any decisions on such.	Volume 2, Section 2: Description of the Project Volume 2, Section 11.3 - transport	N	A matter for discussion between Adani and Macmines.	Comments regarding MacMines access to the China Stone site have been noted. Adani will consult with MacMines and relevant stakeholders prior to Moray-Carmichael Road upgrades and realignment.	Not Applicable		
21	Macmines Austasia P/L	Introduction	Relationship to other projects	<p>Adani is in discussions with the Coordinator General regarding a declaration of land relating to the Carmichael (Rail) Project as a State Development Area (SDA) under the SDPWO Act.</p> <p>Mac Mines is currently engaged in discussions with Adani in relation to cooperation on an integrated rail alignment which needs to include a direct connection to the Project China Stone project site.</p> <p>The current proposed Project China Stone off-lease rail alignment traverses the northern end of the Carmichael (Coal) Project site. MacMines will require access to the proposed rail alignment within the proposed Carmichael MLA to ensure the viability of the project.</p>	MacMines request that if the Coordinator General intends to declare a SDA over land relating to the Adani rail alignment, that the proposed MacMines alignment is also included in this declaration to ensure the viability of the project.	Volume 4, Appendix D: Project Approvals and Planning Assessment	N	For the Coordinator-General's consideration at a later time, this is outside the scope of the Carmichael EIS	Comments are noted.	Not Applicable		

Pages 101 through 254 redacted for the following reasons:

s. 73(2) - Not relevant/ Out of scope

Submitter no.	Submitter	Category	Sub-category	Issue - Details	Submitter Recommendations / Suggested Mitigation	Relevant EIS Section	Action required? (Y/N)	Previous Direction to Proponent	Proponent response (provided August 2013)	Present in SEIS Section DSEIS?	Further Direction/Comments
s. 73(2) - Not relevant/ Out of scope											
21	Macmines Austasia P/L	Draft Offset Strategy	proposed offset areas	The proposed Draft Offset Strategy includes an assessment of the offset potential of the Moray Downs property. The EIS states that Moray Downs may meet a significant portion of the project offset requirements for a number of protected flora and fauna species. A portion of the Project China Stone proposed Mining Lease Application (MLA) area overlies the Moray Downs property. Attached Figures 2-4 show the location of the Project China Stone proposed MLA area, in relation to the areas of Moray Downs which were assessed for potential offsets. The securing of offsets within land underlying the Project China Stone proposed MLA area will have a significant impact on the viability of the project.	MacMines request that no offset areas are secured or approved on land underlying the proposed Project China Stone MLA area. The securing of such offsets would significantly constrain the proposed mining activities within the MLA area and is likely to make the project not economically viable.	Volume 1, Section 9: Draft Offsets Strategy; and Appendix AH: Carmichael Coal Mine and Rail Project Environmental Offset Strategy	Y	The revised offsets strategy will need to take into account the land proposed for the China Stone project and its mining lease.	Adani will consult with China Stone during the finalisation of the offset plan. Please refer to the revised Offsets Report in SEIS Volume 4 Appendix F.		
21	Macmines Austasia P/L	Transport	Road impacts	Road access to the Carmichael (Coal Mine) Project site is via approximately 90 km of unsealed council roads, including Moray-Carmichael Road and Elgin-Moray Road, which link the project site to the Gregory Development Road. The EIS states that as the Moray-Carmichael Road passes through the proposed mine footprint, it will need to be temporarily realigned while mining takes place in the central part of the mine (refer to attached Figure 5). Once rehabilitation in this area is completed, Adani propose to establish a permanent road alignment established as close as possible to the existing alignment. Road access to the Project China Stone proposed MLA area is via the same unsealed council roads, including Moray-Carmichael Road, and this route will likely be the primary access for project-related vehicular traffic. As such, any proposed realignment of Moray-Carmichael Road or the other unsealed council roads along this route, may affect access to the Project China Stone site.	MacMines request that any proposed realignment of Moray-Carmichael Road, or other unsealed council roads which provide access to the two projects, takes into account the use of the roads for access to the Project China Stone site. In particular, access to the Project China Stone site must be maintained at all times. MacMines will commence discussions with Adani regarding the road upgrade and realignment, and request to be involved in any decisions on such.	Volume 2, Section 2: Description of the Project Volume 2, Section 11.3 - transport	N	A matter for discussion between Adani and Macmines.	Comments regarding MacMines access to the China Stone site have been noted. Adani will consult with MacMines and relevant stakeholders prior to Moray-Carmichael Road upgrades and realignment.	Not Applicable	
21	Macmines Austasia P/L	Introduction	Relationship to other projects	Adani is in discussions with the Coordinator General regarding a declaration of land relating to the Carmichael (Rail) Project as a State Development Area (SDA) under the SDPWO Act. Mac Mines is currently engaged in discussions with Adani in relation to cooperation on an integrated rail alignment which needs to include a direct connection to the Project China Stone project site. The current proposed Project China Stone off-lease rail alignment traverses the northern end of the Carmichael (Coal) Project site. MacMines will require access to the proposed rail alignment within the proposed Carmichael MLA to ensure the viability of the project.	MacMines request that if the Coordinator General intends to declare a SDA over land relating to the Adani rail alignment, that the proposed MacMines alignment is also included in this declaration to ensure the viability of the project.	Volume 4, Appendix D: Project Approvals and Planning Assessment	N	For the Coordinator-General's consideration at a later time, this is outside the scope of the Carmichael EIS	Comments are noted.	Not Applicable	



ANNEXURE A

Adani Carmichael Coal Mine and Rail Project
Adequacy Review of Draft Supplementary Environmental Impact Statement – MNES Chapter
(EPBC 2010/5736)

Document:	Carmichael Coal Mine and Rail Project, Supplementary Environmental Impact Statement, Chapter 11 Matters of National Environmental Significance – August 2013
Date of Review:	August 2013
Reviewer:	Department of Sustainability, Environment, Water, Population and Communities (DSEWPaC).

Impacts relating to MNES	DSEWPaC Comments on SEIS
DSEWPaC Comment on EIS (letter to Steve Mill dated 19 March 2013)	

s. 73(2) - Not relevant/ Out of scope	
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Refinement of project description The department requested that the proponent clarify all components of the project to ensure there is no ambiguity between elements that are in the referred action and subject to assessment, and those components that are not. The example used was the borrow pits, which the proponent had indicated are not subject to this assessment and may require assessment on a separate approval path. The proponent agreed to provide a statement to the department delineating the elements of the project that are to be assessed and those that are not.	Partly addressed. A clearly defined mine plan with all aspects of the project identified must be provided to illustrate the refined project description; and to prevent ambiguity regarding the placement of infrastructure in relation to MNES. The mine plan must eliminate any uncertainties regarding the location of any infrastructure elements or known mining activities included in this assessment.
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Pages 257 through 277 redacted for the following reasons:

s. 73(2) - Not relevant/ Out of scope