

20 August 2026

██████████
John Gorton Building
King Edward Terrace
Parkes ACT 2600

Dear ██████████,

Re: Copi Mineral Sands Project – EPBC 2024/09955 Summary of Response to Public Comments

I refer to the National Environmental Protection Agency's (formerly the Commonwealth Department of Climate Change, Energy, the Environment and Water) Direction to Publish Preliminary Documentation for the Copi Mineral Sands Project (the Project) issued on 23 April 2026. On the 17 May 2026 RZ Resources Limited (RZ) published the Preliminary Documentation for 10 business days as required.

During this period, RZ received one comment related to the Project's biodiversity offsets. RZ is required to submit a response to the comment addressing the concerns raised. Biodiversity Australia (BA) have prepared a response to comment on behalf of RZ (**Attachment 1**). R.W Corkery & Co (RWC) have prepared this letter on behalf of RZ summarising the comments received and BA's response.

"RZ has not responded to the Department's request for information (RFI)... In particular... Sections 7.1 to 7.3 of the PD do not 'respond' to how the offset proposal will:

- *Meet the principles specified in the EPBC Act Environmental Offsets Policy...*
- *Directly contribute to the ongoing viability of the relevant protected matters to deliver an overall conservation outcome that improves or maintains the viability of the protected matter in the region...*

The PD therefore gives the reader 'no tangible understanding of how the credits will meet the Policy's objectives and principles.'

In determining the required offsets, the New South Wales (NSW) Department of Climate Change Energy, the Environment and Water (DCCEEW) Biodiversity Offset Scheme (BOS) – Biodiversity Assessment Method (BAM) framework were used, which included preparing both a State Biodiversity Development Assessment Report (BDAR) and Commonwealth Preliminary Documentation (PD) in order to satisfy the offset requirements of both *Biodiversity Conservation Act 2016* (BC Act) and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

It is noted that the NSW BAM and BOS have been endorsed by the Commonwealth formally via a bilateral agreement and therefore, the offsetting outcomes are accepted by NEPA for the purposes of the EPBC Act. On 20/05/2026, the NSW Department of Planning, Housing and Infrastructure (DPHI) approved Development Consent SSD-41294067, accepting the offset credits required for the Project.

Furthermore, RZ Resources are progressing with Biodiversity Stewardship Site in accordance with the *Biodiversity Conservation Act 2016*. at the Bells Grove Property (Lot 267 2 DP76473 5) which will provide like-for-like Biodiversity Credits for all, or part of six Plant Community Types (PCTs) requiring offsetting. The property will also provide credits to partially offset impacts to the Threatened Species *Austrostipa nullanulla* (Nulla Grass). Any remaining credit value required will be addressed by a payment to the Biodiversity Offsets Scheme portal. Given these points, RZ has addressed the Projects offsetting requirements.

“So that RZ can satisfy stakeholder interests and concerns, and give the delegate confidence the proposed credits will provide a conservation/net gain, RZ should demonstrate the protected matters are present, or likely to be present, at the stewardship site/s; and

- *commit to a minimum offset area of the relevant PCTs; and*
- *outline habitat quality improvements it will implement, and timeframes it will meet, that target the ecological requirements of the four impacted species and the Mallee Bird Community of the Murray Darling Depression Bioregion. ”*

The requirements of Commonwealth DCCEEW at the time of this project were ‘no net loss’. The requisite offset obligation to deliver no net loss compensation is demonstrated in **Table 1** of BA’s response. Additionally, the NSW BOS and in particular, the *Biodiversity Conservation Amendment (Biodiversity Offsets Scheme) Act 2024* reforms continued to strengthen the integrity of the BOS and transition the scheme into a Net Positive (or Net Gain) standard. The approval of the projects BDAR by the NSW DCCEEW demonstrates that the project has met this standard.

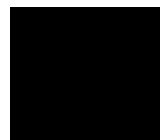
Additionally, on 9 July 2026 the NEPA requested additional information regarding PCTs in the Bells Grove Property and how this offset contributes to the ongoing viability of the:

- Pink Cockatoo (eastern) (*Lophochroa leadbeateri leadbeateri*)
- South-eastern Hooded Robin (*Melanodryas cucullata cucullata*)
- Southern Whiteface (*Aphelocephala leucopsis*)
- Corben’s Long-eared Bat (*Nyctophilus corbeni*)
- Mallee Bird Community of the Murray Darling Depression Bioregion. (Particularly in relation to like-for-like offsets for this ecological community.)

BA have since provided this additional information on the above, and have included this in an addendum to their response (**Attachment 2**)

I trust that this letter and the associated attachments provide the information required at this stage. Please do not hesitate to contact me should you require any further information

Yours sincerely



Senior Environmental Consultant

Attachment 1 - Preliminary Documentation Public Exhibition Comment (Biodiversity Australia, 2026)

Attachment 2 - Preliminary Documentation Response to Public Comment Submission Request for Information