

Thursday, 25 June 2026

RZ Resources

Attention: [REDACTED]
Manager - Environment & Approvals

Delivery via: Email [REDACTED]

**Copi Minerals Sands Project (EPBC 2024/09955)
Preliminary Documentation Public Exhibition Comment [REDACTED] 28 May 2026**

Dear [REDACTED]

As requested, we provide a response to the public comment received in the letter from [REDACTED] dated 28 May 2026 (Appendix A).

RZ Resources and Biodiversity Australia have utilised the endorsed New South Wales (NSW) Department of Climate Change Energy, the Environment and Water (DCCEEW) Biodiversity Offset Scheme (BOS) – Biodiversity Assessment Method (BAM) framework, including providing both State Biodiversity Development Assessment Report and Commonwealth Preliminary Documentation to satisfy both *Biodiversity Conservation Act (BC Act) 2016* and *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) offset obligations. These reports were prepared and submitted in accordance with both state and commonwealth requirements.

The NSW BAM and BOS have been endorsed by the Commonwealth formally via a bilateral agreement (<https://www.dcceew.gov.au/environment/epbc/approvals/state-assessments/nsw>). This means that offsetting outcomes achieved through the NSW BAM will be accepted for the purposes of the EPBC Act, provided that they are 'like-for-like' in relation to listed threatened species and communities as defined for the purposes of the EPBC Act. The BDAR for the project was reviewed and approved by the NSW DCCEEW on 20/05/2026 (<https://www.planningportal.nsw.gov.au/major-projects/projects/copi-mineral-sands-project>) thus confirming its compliance with the BAM 2020. The adequacy of these offsets in the context of the EPBC Act Environmental Offsets Policy 2012 has been described within the provided Preliminary Documentation.

In his letter [REDACTED] suggests that "Offset requirements are not addressed". The table provided below outlines the strategy for offsetting/compensating impacts resulting from the approved action. The offset requirement of the project has been calculated for each of the 5 stages as shown in Table 1. RZ Resources have established a Biodiversity Stewardship Site in accordance with the *Biodiversity Conservation Act 2016* (with context of the NSW bilateral agreement) at the Bells Grove Property (Lot 2672 DP764735) which will provide like-for-like Biodiversity Credits for all or part of 6 Plant Community Types (PCT) requiring offsetting within the copi project Development Footprint. Bells Grove will also provide credits to partially offset impacts to the Threatened Species *Austrostipa nullanulla* (Nulla Grass) within the Development Footprint. Where impacts to PCTs and Threatened species have not been offset via Bells Grove Biodiversity Credits, credits may be acquired via additional potential biodiversity offset sites which are currently being investigated. The



remaining credit value will be covered by a payment via the BOS Payment Portal. This amount is shown in Table 1 below.

■■■■■■■■■■s other suggestion that the project is not “Delivering a conservation gain”, is not statutorily relevant to this project as the requirements of Commonwealth DCCEEW at the time of this project were ‘no net loss’. There is no statutory expectation for the proponent to deliver a conservation/net gain. The requisite offset obligation to deliver no net loss compensation is demonstrated in Table 1 below. Notwithstanding this, the NSW Biodiversity Offset Scheme 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.



Figure 1: Five credit offset areas (Stage 1 includes the linear corridor and part of the Mine Site).

Table 1: Credit Offset staging with credit breakdown for each PCT, Threatened Species, stages and Offset Site.

BOAMS Child case No./Revision	00055120 (Rev11)	00052609 (Rev 13)	00065357 (Rev 0)	00065359 (Rev 0)	00065360 (Rev 0)	00065392 (Rev 0)	
Assessment Type (Linear/Non-Linear)	Linear Corridor	Mine Site	Mine Site	Mine Site	Mine Site	Mine Site	
Stages	Stage 1A	Stage 1B	Stage 2	Stage 3	Stage 4	Stage 5	
PCT 28 - White Cypress Pine open woodland of sand plains, prior streams and dunes mainly of the semi-arid (warm) climate zone	21	-	-	-	-	-	21
Bells Grove PCT 28 Credits	0						0
Outstanding PCT 28 Credits	21						21
PCT 58 - Black Oak - Western Rosewood open woodland on deep sandy loams mainly in the Murray Darling Depression Bioregion	1150	-	3489	50	169	762	5620
Bells Grove PCT 58 credits	1150		3489	50	169	762	5620
Outstanding PCT 58 credits	0		0	0	0	0	0
PCT 64 - Samphire - Water Weed - Sea-Heath shrubland saline wetland of depressions of the arid and semi-arid (warm) zones	-	-	1403	6309	2269	2030	12011
Bells Grove PCT 64 Credits			1403	6309	562	0	8274
Outstanding 64 PCT Credits			0	0	1707	2030	3737
PCT 143 - Narrow-leaved Hopbush - Scrub Turpentine - Senna shrubland on semi-arid and arid sandplains and dunes	517	-	-	-	-	-	517
Bells Grove PCT 143 Credits	0						0
Outstanding PCT 143 Credits	517						517
PCT 152 - Lunette chenopod shrubland mainly of the Murray Darling Depression Bioregion	-	1021	3542	-	-	103	4666
Bells Grove PCT 152 Credits		0	0			0	0
Outstanding PCT 152 Credits		1021	3542			103	4666
PCT 154 - Pearl Bluebush low open shrubland of the arid and semi-arid plains	1308	910	10567	337	977	7262	21361
Bells Grove PCT 154 Credits	1308	910	10567	337	977	2536	16635



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Assessment Type (Linear/Non-Linear)	Linear Corridor	Mine Site	Mine Site	Mine Site	Mine Site	Mine Site	
Outstanding PCT 154 Credits	0	0	0	0	0	4726	4726
PCT 157 - Bladder Saltbush shrubland on alluvial plains in the semi-arid (warm) zone including Riverina Bioregion	-	-	6369	3533	2083	4716	16701
Bells Grove PCT 157 Credits			0	0	0	0	0
Outstanding PCT 157 Credits			6369	3533	2083	4716	16701
PCT 170 - Chenopod sandplain mallee woodland/shrubland of the arid and semi-arid (warm) zones	133	-	12	-	-	7	152
Bells Grove PCT170 Credits	133		12			7	152
Outstanding PCT 170 Credits	0		0			0	0
PCT 171 - Spinifex linear dune mallee mainly of the Murray Darling Depression Bioregion	155	-	-	-	-	132	287
Bells Grove PCT 171 Credits	155					132	287
Outstanding PCT 171 Credits	0					0	0
PCT 215 - Woollybutt Grass open grassland on red earths of the inland plains	-	-	48	-	-	-	48
Bells Grove PCT 215 Credits			0				0
Outstanding PCT 215 Credits			48				48
PCT 221 - Black Oak - Pearl Bluebush open woodland of the sandplains of the semi-arid warm and arid climate zones	-	60	1509	-	817	6110	8496
Bells Grove PCT 221 Credits		60	1509		816	547	2933
Outstanding PCT 221 Credits		0	0		0	5563	5563
PCT 253 - Gypseous shrubland on rises in the semi-arid and arid plains	-	-	1749	-	-	1103	2852
Bells Grove PCT 253 Credits			0			0	0
Outstanding PCT 253 Credits			1749			1103	2852
PCT 254 - Black Oak - Bladder Saltbush on light clays in the arid zone	-	-	26	-	-	-	26



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Assessment Type (Linear/Non-Linear)	Linear Corridor	Mine Site	Mine Site	Mine Site	Mine Site	Mine Site	
Bells Grove PCT 254 Credits			0				0
Outstanding PCT 254 Credits			26				26
Ecosystem Credits Subtotal	3284	1991	28714	10229	6315	22225	72758
Bells Grove Ecosystem Credits Subtotal	2746	970	16980	6696	2525	3984	33901
Outstanding Ecosystem Credits Subtotal	538	1021	11734	3533	3790	18241	38857
Threatened Species Credits							
Pink Cockatoo	166	-	-	-	-	310	476
Bells Grove Pink Cockatoo Credits	0					0	0
Outstanding Pink Cockatoo Credits	166					310	476
<i>A.nullanulla</i>	-	-	1614	80	45	814	2553
Bells Grove <i>A.nullanulla</i> Credits			292	0	0	0	292
Outstanding <i>A.nullanulla</i> Credits			1322	80	45	814	2261
Species Credits Subtotal	166	0	1614	80	45	1124	3029
Bells Grove Species Credits Subtotal	0	0	292	0	0	0	292
Outstanding Species Credits Subtotal	166	0	1614	80	45	1124	2737
Ecosystem and Threatened Species credit Staged Totals							
Bells Grove Staged Totals	2746	970	17272	6696	2525	3984	34193
Outstanding Staged Totals	704	1021	13348	3613	3835	19365	41594





Project Manager / Senior Ecologist

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BAM Accredited Assessor: BAAS 25008



Appendix A Public Comment

[REDACTED]
Manager – Environment and Approvals
RZ Resources Ltd
[REDACTED]
[REDACTED]

Copi Minerals Sands Project (EPBC 2024/09955)

Please accept my submission on the Preliminary Documentation (**PD**) for RZ Resources Ltd.'s (**RZ**) proposal to construct, operate and rehabilitate a mineral sands mine and associated infrastructure to extract critical minerals approximately 75 km northwest of Wentworth, NSW, and to undertake intersection upgrades required for materials transport in Broken Hill, NSW.

My comments relate to the [PD](#) and [Biodiversity Development Assessment Report \(BDAR\)](#), dated March and April 2026, published on [RZ's website](#). I have had regard for the requirements of the [EPBC Act Environmental Offsets Policy 2012](#) (the **Policy**) and the [How to use the Offset Assessment Guide](#) (the **Guide**).

As I review environmental impact assessment and management documents, I am mindful the documents are designed to secure project approval that minimises compliance cost and regulatory risk to RZ. It is for the regulator to ensure evidence-based, precautionary and enforceable decisions are made on irreversible impacts to ecosystems and species at risk of extinction. I note the Policy and Guide impose an obligation on the regulator to decide on offsets that are, amongst other requirements, *informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty*.

I understand the proposed action will have the following residual significant impacts:

- Mallee Bird Community – 16.72 ha loss of potential breeding and foraging habitat;
- Pink Cockatoo - 2,746.57 ha loss of foraging habitat;
- Hooded Robin - 686.62 ha loss of breeding and foraging habitat;
- Corben's Large-eared Bat - 662.03 ha loss of breeding and foraging habitat; and
- Southern Whiteface - 2,845.65 ha loss of breeding and foraging habitat.

The above impacts are detailed in Table 32 of the PD according to the plant community types (**PCT**) that comprise the impacted habitat and ecological community. I understand RZ proposes to establish one or more stewardship sites within or surrounding the mine site to provide the BAM-C Credits summarised in Table 33.

Offset requirements are not addressed

RZ has not responded to the Department's request for information (**RFI**), reproduced at Section 2.5 of the PD, in particular, to meet the Policy requirements in Section 4.2.3 of the RFI. Contrary to statements in Table 1 of the PD, 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*. For this purpose, RZ lists the principles in Section 4.2 of the PD, states the '*PD has carefully considered the ten offset policy principles when addressing the project offsets*', to then provide no evidence the Policy principles have been considered;

- *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, as compared to what is likely to have occurred under the status quo, i.e., if neither the Action nor the offset had taken place.* Unfortunately, Sections 7.1 to 7.3 of the PD contain no evaluation of whether the credits will improve or maintain 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. As though to address the RFI, Section 7.1 of the PD states:

Given that the NSW BAM has been endorsed by the Commonwealth, the use of BAM-derived offsets for these vegetation types is considered consistent with the principles of the EPBC Act Environmental Offsets Policy, including the requirements that offsets be ecologically equivalent, proportionate to the impact, and deliver a conservation gain.

Delivering a conservation gain

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*.

Following the above, what is the area, and quality relative to the impact site of, for example:

- PCT 154 (*Pearl Bluebush low open shrubland of the arid and semi-arid plains community*) derived from retiring 21,361 BAM-C Credits;
- PCT 221 (*Black Oak – Pearl Bluebush open woodland of the sandplains of the semi-arid warm and arid climate zones*) derived from retiring 8,495 BAM-C Credits; and
- PCTs 170 and 171¹ derived from retiring a total of 439 BAM-C Credits; and

the habitat quality improvements across each PCT offset unit that will deliver a conservation gain for the respective impacted protected matters (Table 32)?

Yours sincerely,



28 May 2026

¹ *Chenopod sandplain mallee woodland/shrubland and Spinifex linear dune mallee mainly of the Murray Darling Depression Bioregion*