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Dear Madam/Sir

Submission – Mount Owen Mine Continued Operations Project (Mod 6)

I wish to make a submission in relation to the modification application for the Mt Owen Continued Operations Project currently on public exhibition (SSD 5850 - MOD 6 – Realignment of Narama Pipeline).

I have reviewed the modification report, and have identified a number of matters that have not been sufficiently identified, or assessed in the Modification Report. These matters should be fully considered and resolved prior to any project approval.

My concerns relate to the following matters:

General

1. Disturbance of an additional 7.5 ha of land represents a substantial and consequential area. The statement on page 14 of the Modification Report that this is “not a substantive change to environmental impacts as a result of the proposal” is unjustified and not correct. Actual impacts must be considered, not the proportion of a total area of impact.

2. The application states that the development is “biodiversity compliant”, yet this appears not to be correct. This is not substantiated or referred in the Modification Report or biodiversity assessment.
3. Any approval should provide for removal and rehabilitation of the pipeline.

Biodiversity

4. The Biodiversity Assessment Method (BAM) used for the assessment is not intended, and unsuited for linear infrastructure such as roads and pipelines. In particular, this method fails to adequately consider biodiversity issues relating to landscape scale habitat connectivity and biodiversity corridors. More detailed review should have been provided on the impact of the proposal on species movement and landscape connectivity rather than basing the biodiversity assessment on minimal site survey and a methodology that does not adequately assess the proposal being considered.
5. Similarly, the BAM focuses on threatened species. The biodiversity assessment should nevertheless consider impacts on common species that are also likely to be impacted by the proposal, as well as invasive species and cumulative impacts of disturbance.
6. Reference should have been made to the biodiversity offset management plans and monitoring results for the project and their relevance to the identification and assessment of impacts.
7. The biodiversity assessment is based on inadequate field survey, with only one day of survey on 3 April 2019 in the middle of a drought. (A1.2.2). This is quite unrealistic for either identifying the presence of many species or for providing confidence in the results of the assessment. Additional survey should be undertaken during a range of seasonal conditions.
8. Inadequate consideration has been given to impacts on riparian areas and streams.
9. The Biodiversity Development Assessment (BDAR) report assumes that exempt land under the Native Vegetation Regulatory Map is correctly mapped. This should have been checked and confirmed as it represents a real impact, and not simply an administrative process requirement.
10. The measures taken to avoid biodiversity impacts were not adequately considered or documented in the BDAR. The report needs to state what these were, including the consequences of not proceeding with the proposal.
11. A serious omission is that the Modification Report fails to specify how biodiversity offsets will be met. The biodiversity offset strategy for this project modification lacks any detail at all except for identifying the number of credits. Mt Owen has had a history of multiple offsetting of biodiversity offsets over decades which provides no confidence in the adequacy of the secure provision offsets having regard to their purpose. Similarly, no commitment is made to the provision of offsets in reasonable proximity to the location of the impacts which should be a priority.

Greenhouse gas & energy

12. One objective of the modification proposal should be the achievement of zero net carbon emissions. However, the proposal makes the unreasonable proposition that this is not the proponent’s responsibility.
13. Any approval for the proposal should be on the basis that carbon emissions attributable to the proposal are fully offset using an appropriate mechanism.

The Mt Owen Mine has already had a significant impact on regional biodiversity, and the proposed modification and extension of operations will further increase this impact.

While Mt Owen has a reasonable record in biodiversity monitoring and management, incremental and ongoing development of the mine has not provided adequate biodiversity offsetting and management measures to achieve no net loss of biodiversity envisaged by applicable legislation, including the *Biodiversity Conservation Act 2016*.

Specifically, the following matters require further assessment, and need to be addressed through appropriate measures in any approval:

1. The security of offset areas associated with the mine has not been guaranteed. This should be an essential requirement of any approval. This can only be achieved by establishing offset areas as stewardship sites under the *Biodiversity Conservation Act 2016*.
2. Climate change represents a significant risk for successful implementation of biodiversity impact measures, recognising that carbon emissions from the mine operation and production are a significant contributor to climate change.
3. Ongoing biodiversity monitoring at the site must continue for the full mine life and at least 20 years beyond. The long term monitoring undertaken to date is of regional and national scientific importance. It is essential that the existing fauna and flora monitoring, management and governance program be maintained until the end of the mine life, and in the rehabilitation period following closure.

Please ensure that the matters outlined above are taken into account in the assessment and determination of the modification application for the mine.

Thank you for the opportunity to make a submission.

Yours sincerely

M Fallding
Principal, Land & Environment Planning

15 December 2020