

Dr Richard Stiles
PO Box 431
Lithgow, NSW, 2790

24/10/19

Department of Planning Industry & Environment,
GPO Box 39,
SYDNEY. NSW. 2001

**Ref: McPhillamys Gold Project Application Number SSD-9505:
EPBC ID Number 2019/8421**

On behalf of the Lithgow Environment Group, I would **submit our opposition to the above-proposed development.**

Other groups will likely cover aspects of the local impacts of the mine. However, as a group who cares about a neighbouring region – the Lithgow and Sydney drinking water catchment areas – I would like to focus on these.

The proposed water transfer arrangements proposed for this mine are highly contentious. Centennial Coal Company (Centennial) has already come under fire for its impacts and management of groundwater pumped out of its mines in the Lithgow region – resulting in it losing a court case in the NSW Land and Environment Court in 2017 (1)– due to its failure to comply with water quality regulations in the Sydney drinking water catchment. In response, the NSW government down-regulated the laws around water quality standards (2) – a low point in government environmental responsibility.

So in an already contentious domain, for 13Ml / day of water to be proposed to be transferred out of the local water catchment is pretty bold.

As the DPI&E will be acutely aware, water access issues in NSW are becoming very serious. Much of the change is due to changing climatic conditions caused by climate change. This is a fact now, not a conjecture.

The water that McPhillamys is seeking to use would otherwise be returned into the rivers that flow into Warragamba Dam – Sydney's main drinking water supply – which is currently only 49% full. Allowing the groundwater to flow into its normal catchment also maintains ecological integrity of the Greater Blue Mountains region – a natural environment area that has been conferred World Heritage status.

The competing case is that this water could be used in the mining and processing of gold - a non-essential mineral, for most purposes, in terms of human survival.

We would suggest that, actually, *the water* is a far more precious resource, and it would be reprobate at our current stage of water scarcity to direct this limited resource towards supporting a non-essential mining business.

Yes, jobs will be created – but jobs can be created through any number of initiatives. Jobs creation for unethical reasons is still unethical. Job creation should only be supported when the jobs that are generated are not over-shadowed by other broader detrimental considerations. This should be a general rule for assessment of development projects.

So what should our priorities be?

At a time when many rural communities are facing existential threats due to lack of water, is it reasonable to divert water towards a non-essential business – that will also have a whole host of other disadvantageous environmental effects?

The Lithgow Environment Group would suggest that even just on the water merits, this development application does not justify support. And this comes alongside all the other local impacts that gold mining has – with all its toxic waste products etc. The iridescent tailings dams of the Arcadia mine, near Orange, are a readily available picture of the local environmental impacts that such an industry can generate.

Do we really need more of this, at such environmental cost, just because some business thinks there's money to be made in mining a further deposit of gold?

The Lithgow Environment Group would offer that this mining proposal rests on a host of non-justifiable environmental, and also social, adverse impacts – notably, from our perspective, its impacts on diverting precious water resources towards non-essential purposes - and on this basis should not be supported.

Thank you for offering the opportunity to comment.

Yours sincerely,

Dr Richard Stiles

President - Lithgow Environment Group

References:

1. 4nature Incorporated v Centennial Springvale Pty Ltd [2017] NSWCA 191.
2. Environmental Planning and Assessment Amendment (Sydney Drinking Water Catchment) Bill 2017

