

24<sup>th</sup> October 2019

Planning Services, DPIE  
GPO Box 39  
SYDNEY NSW 2001

Dear Sir/Madam

**RE: MCPHILLAMYS GOLD PROJECT SSD-9505**

The Belubula Headwaters Protection Group formally OBJECTS and OPPOSES the abovementioned proposal, that of the McPhillamys Gold Project, SSD-9505. We confirm our group has not made any political donations.

Our group (The BHPG) was established in September of 2018 and already has over 70 financial members in just 12 months of operation. We continue to gain, on average, a member per week. The membership is represented by a broad range of demographical members of the communities from Bathurst, Orange, Blayney and surrounding villages. In addition to financial members, we have just fewer than 300 followers on our Facebook page at date of writing. This is increasing on average by 8 followers per week.

Our group was formed by residents that seek to preserve and improve the quality and amenity of the Belubula Headwaters and surrounding areas including Vittoria, Guyong and Kings Plains. Residents were concerned with the degradation of the river over time and, when learning of the McPhillamys proposal details and the obvious impacts that will occur to the system that contributes to the Carcoar Dam, Lachlan River and subsequently the Murray Darling Basin, they felt it necessary to create action.

Our members and associated groups and individuals encourage the DPIE to look beyond the desktop models that understate the true impacts to the existing and future water, heritage, ecological, agricultural and community impacts; and the overstated economic benefits of this proposal, and see it for what it really is – a short term effort to extract a small portion of unusable resource with the sole aim to generate profits to be paid to a small portion of the world's population.

As a matter of importance, we'd like to comment on the submission process in two facets: the timing provided to the public to review, analyse and form a submission on such an impactful proposal is far too insufficient. The proponent has had nearly 7 years, countless consultants and their primary attention to collate this proposal. Those that are full time employees with families and limited knowledge in the areas of impact are given just a matter of weeks to respond. We have had to educate ourselves, take time away from our employment, families and social lives and spend sleepless nights going through the more than 6000 page proposal and forming responses. Secondly, many more objections would have been made if there was more time, and if the online account structure was more user friendly. We have been assisting dozens of people with the creation of even just the password, then the activation of the account, right down to how to navigate the submission windows and how to save their submission as a PDF due to the system not accepting Word documents.

The proponent has very clearly attempted to disguise this proposal from the public since acquiring the project nearly seven years ago. Their efforts of community consultation in a time period that is equivalent to 70% of their proposed operational period has resulted in just 2 public meetings, one of which was only called after our group publicised our own meeting and invited Regis representatives to attend, to which they declined. They have only held 2, (now 3) community information sessions which have all been held at the same time on weekdays, regardless of feedback from the community given directly to them about some people's inability to attend those time slots due to work and other commitments. The publicity of these opportunities for public education and consultation are always minimal, usually comprising just local newspaper and fringe radio station advertisements. This is despite the fact the proponent has a stand-alone website for the proposal which was not used for promotions for any consultation events, nor were they distributed through their email list of people who registered an interest in the project.

As an example of the proponents lack of promotion, education and consultation, our group had yet another public meeting on October 8<sup>th</sup> (2019), of which just over 60 locals attended with less than a week's notice (due to the time sensitivity of the DPIE submission process). Three of the attendees raised the fact they knew nothing of the proposal and yet all live and work within a 30 minute drive of the proposal. Subsequent to our meeting and prior to writing this, we have received a further dozen enquiries through our email and Facebook channels advising they are all locals and have only just become aware of what was proposed by way of our promotion of the proposal. Our group had distributed over 20 of the proponent supplied USBs containing the EIS within a week of it being released for public exhibition. Although the proponent raises a branded gazebo at local markets, they're rarely talking about the proposal and its details. In fact, at the markets following the release of the EIS to the public, they didn't have USBs or references to this at their stand; instead, they're hidden in the cars or under tables. They just have hats, bottles and previously distributed community information pamphlets on display. The community pamphlets they distribute always contain the same messages: the estimated average job numbers to the local area, without the explanation that this includes Bathurst, Orange and Cowra, which misleads local readers; and the statement that they've planted some trees and consulting local landowners. There are never any references to the known impacts on native vegetation, water, displaced residents, noise, air quality and biodiversity. To this day, a majority of Blayney residents honestly believe this proposal will employ hundreds of Blayney residents and bring hundreds more to town. The proponent has allowed this misconception to manifest into what now divides local residents of a small community.

In extension to the proponent's lack of education and consultation, our group completed a door to door mailbox drop of an information sheet and funded a postal distribution of the same to the Blayney LGA, Since this, our group has consistently fielded phone calls, emails and questions from nearby neighbours in Kings Plains, Guyong Road, Vittoria, Blayney and Fitzgeralds Mount claiming they either weren't contacted at all, weren't followed up after being promised they would be, or had nothing explained to them from the proponent. All of the above directly contradicts the proponent's claims of considerable consultation in their EIS. To be very specific about the fact the proponent has lied in their claims of adequate consultation, Appendix T, page 38 in table 12, our group is listed as a Non Government Organisation that the proponent has given a presentation to. We can confirm that at no point has the proponent even offered to meet with our committee for a discussion, let alone a presentation to our committee or our members. In fact, our group extended an invitation for the proponent to join us at our public meeting back in April of 2019, to which they declined and later organised their own. The proponent has, at no time, made any efforts to hear concerns from our group or our members. If the proponent has lied about presenting to our group, it concerns us about what other consultations they have lied about, and to the nature of what the proponent claims to constitute adequate consultation.

Of greatest concern to our group are the significant shortfalls in the assessment requirements. These will be detailed in the proceeding detailed questions and commentary on the EIS. Separate from the items that will be discussed in the EIS details, we are concerned that a health assessment of near neighbours is not required and has not been conducted by the proponent. For an entity that is claiming to be part of the community, why has no effort been made to assess the current health status of their closest neighbours to determine if there will be any impacts to them resulting from the proposal? In extension to this, why are the health impacts on the workforce not required to be considered in the proposal? The proponent is happy to promote the small increase in workforce, but at no point discusses the statistical reduced life expectancy of this workforce as a result of working in the project, nor the increased long term costs to the health care system for issues that arise later in their lives.

Our group carried out a health assessment of nearby neighbours and the results are as follows. 107 residents from 37 households responded to the health survey, 43 of these are children. 35 of these households are less than 2km from the project boundary. 70% of respondents listed at least one form of current health issue that include: Asthma, respiratory conditions & lung dysfunctions (including seven cases of severe respiratory disorders), heart disease &, hypertension, diabetes, stress, anxiety, depression, low immunity and other serious health problems. With so many nearby residents suffering from respiratory and mental health concerns, many of whom specifically moved to the area to assist and

improve their health conditions, why has the proponent not addressed the health impacts that will result from the project? Any increase in dust, emissions, sleep disturbance or stress could result in catastrophic impacts to those already suffering from health concerns, regardless of if those increases meet regulatory guideline requirements.

The second major point that underpins our concerns about this proposal is that it seems the loss of, what is claimed to be small portions of various aspects, is acceptable for the perceived potential financial benefit of the project. This will be further detailed in our summary at the end of our submission, but initially, in the application for the SSD when asked “Is the development likely to significantly affect threatened species, populations or ecological communities, or their habitats?” the response is “Yes”. How can the DPIE seriously consider a proposal that will clearly destroy long term existing habitat and existing threatened species in the hope of gaining some short term financial benefits?

For ease for the proponent to respond, we have attempted to group questions and commentary as much as possible in a similar order to the EIS, or at a minimum, in similar groupings for specialist areas. However, given the volume of the EIS and limited time to prepare this response, parts of this response has had contributions from varying parties and your understanding in varying formats, structure and terminology is much appreciated.

### **Justification for project**

The justification claims to be on the basis of best economical use of the land, but it fails to value the accumulated economic costs if the project is approved. The EIS is tactically prepared to state the accumulated estimated economic benefits, but segregates the costs and negative implications into small portions so that by themselves, they don't appear significant.

On page 7 in Chapter 1 of the main report the project objectives are listed at 1.3. It is important to note that of the objectives, profitability to the company and its shareholders is not listed. Interestingly, effectively managing the impacts on surrounding residents and the local environment, as well as generating economic activity to the local regional and state communities are listed as objectives. It's intriguing to then discover that at multiple sections through the EIS, the proponent justifies methods of operation and rehabilitation based on the economic feasibility of the activities. One example is that in Appendix U, backfilling of the final void is determined to be not financially viable. It appears that several aspects of this project are justified based on the economic feasibility, which is not listed as a strategic objective of the proposal. Conversely, these justifications are at the expense of local economic stimulus (by way of further employment to complete more work), and maintaining the local environment, which are part of their strategic objectives for the proposal. It appears that although they've listed their strategic objectives, their justifications for the proposal contradict these. This will become more apparent in the details of our submission that follow.

Further to the above justification for the proposal, at section 1.6 on page 81, the proponent explains that 92% of the mined ore from this project will be used for unnecessary, arbitrary products and investment instruments. Meaning 92% of product is useless to the community, the region and the broader population. Are all of the negative impacts and costs of this project worth an 8% increase in a useful resource?

### **Main Report and generally**

1. The proponent claims that contributing 'only' 0.095% of Greenhouse Gas Emissions to NSW (ES 4.1.6) is a minimal contribution. Yet their financial contribution to NSW of \$141M (as a low estimate), represents just 0.025% of NSW GDP (2017), or \$232M (as the upper estimate), representing only 0.041% of NSW GDP (2017). Considering the economic contribution to NSW is less than half the contribution to NSW GHG emissions, does that make the economic contribution microscopic?
2. In the PEA, the proponent stated (p.27) that 'The EIS will include a detailed site water balance under average, dry and wet conditions.' Is this anywhere in the EIS? If so, where and if not the proponent needs to supply one and justify how it arrived at the figures.

3. Both the Noise and the Air Quality appendices report estimates of the impact of the project at individual sensitive receptors. The Visual consultants indicate they have carried out comparable assessments but they are not included in the EIS. Can these be supplied?
4. Why has the peer review for the Noise appendix not been included with the report?
5. Why is there a discrepancy in the number of receivers recommended to be covered by VLAMP in the Noise assessment (15 receivers) and the number budgeted for in the economic appendix (12 receivers).
6. The proposal will result in an increase in LSC Class 6-8 land of 423 hectares. This represents land that will:
  - I. Be susceptible to severe erosion;
  - II. Is unsuitable for grazing
  - III. Salt outbreaks;
  - IV. Low to no fertility;
  - V. Major flow lines for water susceptible to flooding; and
  - VI. Slopes up to 50%.

Acknowledging that the Class 8 land will be the pit, Class 7 is still unsuitable for grazing and we're lead to believe this will represent the peak of the waste rock emplacement. Given the above, we can't find anywhere the proponent addresses the fact if they lace the emplacement with topsoil in attempt to revegetate it, is their an increase risk of fire given the land will unlikely be grazed? Additionally, given the steepness of the embankment ranging fro 25% to 50%, is there any risk of land slides/soil movement that may result in exposing the potentially acid forming material beneath the top soil?

7. The pipeline assessment identifies 297 noise receptors. It goes onto explain that noise at these receptors exceeds all mitigation and acquisition levels but are calculated at maximum output levels which they claim would be unlikely. This contradicts the claim that pipeline will be built as quickly as possible given you would need maximum output to achieve this. These residents haven't been offered mitigation and are expected to live for days with noise in exceedance of 20db over their current levels. The proposal states that a noise management plan for the construction may be considered by the proponent if there are sufficient community concerns or if a formal noise complaint is made. Again, more reactive solutions from a proponent claiming to be here for the people and communities. Why would not this be part of the plan proposal to show they're proactive in ensuring they don't impact, or minimise the impact of people's lives?
8. The proponent admits that the Biodiversity assessment for the pipeline was initially conducted using desktop assessments, but when a field assessment was finally carried out, it resulted in "many changes to both the route and width of the pipeline". This speaks to inadequacies of desktop modelling and assessments as has been used for several of the reports prepared in this EIS.
9. The proponents assessment of time to move to 24/7 operations is 6 months on the assumption that a sufficient 'bund' will be created to help shield noise. If this bund has not progressed as planned, does the proponent still intend to move to 24/7 operations at the fixed time period of 6 months from approval, regardless of the stage constructions is actually up to?
10. At several stages through the EIS, alternatives are dismissed for being "not financially viable". There is then no explanation to the estimation of costs for the alternatives and the claim is essentially left baseless. As mentioned in the justification for the project above, it would seem that the economic appendix boasting the profitability of the project is at odds with the other appendices claiming that alternatives are too expensive. This would indicate a highly sensitive costing model has been adopted, and small variations to it will lead to significantly varying outcomes in profitability. Again, given the financial gain to the proponent and its shareholders is not stated anywhere as a goal, objective our outcome of this project, why does it matter if the profit is \$2B as opposed to \$3B?
11. Given the proponent has publicly stated to it's shareholder that "the EIS and approvals process for Discovery Ridge will be completed whilst MGP (McPhillamys Gold Project) is in development" (September 2018 quarterly report); has this entire proposal allowed for the assumption of processing ore from Discovery Ridge? Including the timeliness of construction of the Tailings Dam, demand on water, resources and processing requirements?

12. On Page 225 of the Main Report, it states that Envirokey identified 62 native and 42 exotic trees, whereas the consultants who ended up preparing this EIS only identified 32 native and 27 exotic species after 6 years has passed of the proponent owning the land. What happened to the other 30 native species? How is there a 48% reduction in identified native trees after just 6 years and no mine operating?
13. When referring to the climate for the project, it refers to rainfall from 1991 to 2018; however for the pipeline climate it uses data up to 2019. Why the difference in data sets?
14. The Koppen Climate Classification system is inappropriate for the mine project area given the lowest temp at the Orange airport in 2019 was minus 5.2, and the highest was 37.5 degrees in January 2019. In an area with such an extreme deviation in temperatures, averages are inaccurate. An alternative method of weather and climate assessment needs to be used by the proponent to get a true understanding of the impacts of their proposal.

### **TSF Risk Assessment**

(Information from: V1A, (ES no comment as far as I can see); p.179-181; V3A, App. F, p. 1-30)

1. The review appears a fair one although the assessment team comprised 6 members who were consultants on the project to RR, the team facilitator (chosen by RR), and 7 RR employees. One team member (Noble) was the author of what appears to be a major report on which the assessment drew heavily. While the membership had the advantage of all being familiar with aspects of the project there were thus no truly independent members and hence the claim that they provided 'peer review' of the hazards assessment document ( V1A p.179) places a rather strained interpretation of the concept of peer review and certainly doesn't equate with that acceptable in the scientific community.
2. The list of 'relevant parameters related to 'sustainability' (V1A ES. p.180, App. F, 16) contains parameters that fall outside of those normally associated with sustainability including 'capital cost' and 'operating cost' It is not clear whether 'tailings stability' related to chemical or physical stability, and I am surprised 'rehabilitation' was not included in the HAZOP process.
3. There is no documentation of the effects of climate change, in particular the increased frequency of extreme weather events was not considered as a potential hazard.
4. To equate 'minor' with 'minimal' (V3A, p.17, Table 6) is nothing more than trying to 'guild the lily'; the latter means 'very minute or slight', minor is somewhat greater.
5. The seismic risk to the TSF was treated in a very summary section in V2A (p.56-57) and is not even considered to recognise it as a hazard in the risk assessment. With a professional geologist on our committee, we would agree with the opinion expressed in V2A that the likelihood of movement on nearby mapped faults is very low. However, a more reassuring analysis, including reference to nearby recent very small earthquakes for which at least the Blayney Shire residents are well acquainted, is warranted.

### **Agricultural Impact Assessment**

The EIS States that this isn't high quality agricultural land and states that it is marginal. This understates the true potential of the land. As it stands, its use is minimal because it's owned by a mining company that continues to drill holes all around it so it can be run productively for agriculture. The area is currently experiencing unusually dry times, and this cannot be considered the normal for this area. We decided to speak to a local to provide a documented history of Ingledoon, the property where the mine pit is intended to be placed. It demonstrates that this land has been a good performer as agricultural land in the past up until it was bought for the exploration of ore.

Mr. Tony Cashen is a 4th Generation Kings plains resident. He has managed Ingledoon Farm for approximately 15 years and has owned the adjacent property for Approximately 20 years but worked it since the 1970's when his uncle owned it.

The farmland that is in the Regis's area of holdings is 1 cow & calf to 3 acres or 3 DSE sheep to the acre. This area has been historically known as a safe area for livestock growing capacity.

This country has been renowned for fat lamb production as well as beef with Tony topping the Orange saleyards in 2007 for his vealers grown on Ingledoon. Other types of produce grown over the years in this

area are: Hay (meadow & oaten hay), Potatoes (average yield per year was 10 – 12 ton to the acre), cropping (oats), Lucerne for haymaking (2 cuts per annum.) and this area has also sustained pea crops in the past. Over the years the area has maintained native Biodiversity in conjunction to the Agricultural industry that has gone on in this area around the proposed mine site. Tony's experience over the years was that many birds, sugar Gliders, platypus, water rats, fish and marine life were observed in the upper reaches of the Belubula River over the years. There is a very good stand of yellow box, Bundy, Apple Box, wild cherry and black wattle. These stands of trees are old growth with good habitat hollows.

Other Agricultural Impacts include that there are a number of agriculture industries in the area adjacent and around the mine project area, these farms could be seriously affected by the heavy machinery, lasting and toxic dust blowing off the mine site. There are also Apiarist businesses in the vicinity of the mine Project area. These businesses utilise the Eucalypts in the kings Plains area for honey and use the Vittoria State forest for Bee breeding. These

This mine project is not a good fit to the local agricultural industry and could lead to long term effects to local Agri businesses. Regis has stated in the EIS that the land will not be to same quality as it is now once the project area has been revegetated after the mine has closed. The risks are unacceptable.

### **Tailings Storage Facility (Dam) and Water**

**Why is it that after studying different options for the tailings storage facility that the only option where the tailings dam will sit in the Belubula river headwaters is the most favourable choice for the project?**

It looks quite obvious that the reason is due to the economic benefits of building the structure in the valley formation, that is, building just one wall as opposed to numerous, as would be the case with the other sites. The ranking system for the tailing storage facility option assessment summary seems to lean heavily towards more favourable scoring towards the mine. For example on page 20 of the Appendix D, *'a permanent diversion required post closure/creek divisions'* gets a ranking of three. For people affected by this permanent diversion who may be affected by quantity and quality of water on their properties forever, may be more worthy of a higher ranking than three.

Placing the tailings dam on the river where there are a number of springs poses enormous risk to contamination of the system. On page 26 of appendix D there it states *"a partial geomembrane lining within the storage areas where in situ clay materials are not suitable or available."* This does not show a consistent and secure lining method for keeping the tailings out of the river and springs directly beneath it. As this tailings dam is placed in what could only be described as ground zero, seepage from the tailing storage facility will happen immediately not over a number of years as is explained in the wall construction. Once exposed to one of the many springs a rapid contamination could occur drawing the tailings into the spring system and appearing further downstream.

The development of a spillway which will be constructed on the southern perimeter of the main tailings facility embankment, which quoted on page 27 of appendix D will *"discharge into the Belubula River"*, seems astonishing and basically unacceptable. Why has Regis made sure that no matter what happens, no toxic tailings will flow onto the river?

In appendix M part ES 4 it is thoroughly unacceptable that it is stated that *"once the mine has finished, seepage from the TSF is expected to be contained in the saprolite rock zone and flow direction will mainly be horizontal."* **What if this seepage is beneath or above the horizontal rock zone, or what if it seeps through the rock, as there is no added information stating that the rock is impenetrable? Where will this seepage end up?**

It also states that *"some seepage that flows south from the TSF and that is not intercepted by the seepage interception system is expected to flow into the pit due to the large hydraulic gradient between the TSF and void."* This is absolutely disgraceful as this void is not contained and will also become in itself a toxic tailings facility open to wildlife and contaminate all surrounding water systems that flow into it. This in effect will give us two tailings storage facilities which is unacceptable. And Regis has made no mention of or how it will then be managed post mining. In the same paragraph it states that *"some seepage is predicted to flow in the direction of the Belubula River however the distance that the seepage will move*

*over 100 years is approximately 50 m and is contained within the disturbance footprint of the mine".* **Again, how is this an acceptable answer to how the TSF will be managed over time?** This indicates to me that once Regis leaves they have no consideration how and the tailings will flow to, because in 50 years they will be long gone after leaving this mess behind.

It is also disturbing to read that on page 33 of the Appendix D that the Operational Philosophy states that *"releases from the system to the environment are eliminated for all but extreme conditions."* This should not be allowed in **any** condition, not just extreme. A philosophy like this is unacceptable. **And what exactly are extreme conditions? Are they conditions that are just extreme for the mine? Please state Regis, what YOUR extreme conditions are. And when do you think it will be acceptable to allow a tailings release into the river?**

I ask the question how the possibility of a tailings system failure on page 33 of appendix D which states that the *"severity of damage and loss is expected to be no greater than major which is defined as being between 100 million and \$1 billion"*, do you put a price on permanently damaging a river system and all the people who live around it? I would like to know more about **how** these millions of dollars would be spent in cleaning up a toxic river and the surrounding residents and farm lands who rely on this river to run their businesses?

It is understood that cyanide will be used to process the gold from the ore using a carbon in leach set up. We have been assured by Rod Smith from Regis that this is a very safe method and the cyanide will break down in sunlight. If this is such a safe method why have countries such as the Czech Republic, Greece, Turkey, Germany, Hungary, Costa Rica, Argentina, Ecuador, and some states of the United States (e.g. Montana) banned cyanide leach technology in gold and silver mining? This has been mainly due to environmental reasons.

In light of the fact that the CSIRO have developed new technologies as stated on their website: *"A cyanide- and mercury-free alternative reagent and flow sheet. We have developed a cost-effective and environmentally-friendly gold recovery process called 'Going for Gold' Paul Breur leads the CSIRO team developing Going for Gold @CSIRO, The solution replaces cyanide with a safe, alternative reagent known as thiosulphate. Thiosulphate dissolves the fine gold out of ores (the gold that has not recovered by gravity) at similar rates to conventional techniques. It's safe and lowers environmental impacts.*

*The method has undergone intensive testing in the laboratory to understand its leaching performance in association with reagent recovery and recycle. Results indicate it can be applied to a range of ore types.*

*The Going for Gold process requires some additional 'off-the-shelf' components and a new configuration, but is not complex and can be customised to deal with different ore types."*

**Why has this method not been explored or any other method which may be less environmentally destructive?**

Appendix K claims that there is substantial degradation of the land and water sources where the project area is located. The author has stated that there is high degradation of land due to agricultural grazing. Land clearing was actually undertaken in this area not by agricultural land holders but for the old copper mine that used to be operational in Blayney many years ago. Timber was taken off the land and used to fire the Copper mill. Farmers have over many years since spent much time and money on replanting tree lines and native vegetation throughout the Blayney area to combat this destructive practice that took place. I would argue that agriculture has improved this landscape and in fact protected it since the Coppermine closed and worked on improving the land and protecting the river from further destructive operations.

Throughout appendix K there is much written about the lack of importance of springs around the project area. However, the springs play an extremely important role in the quality and quantity of the flow in the river. On page 59 of appendix K there is a map of the project area which shows no less than 30 springs within the project area. Of these 30, 21 springs are located directly under the proposed TSF dam. Every single one of the springs contributes to the Belubula river system and plays a vital role in the health and vitality of this system.

Not only do the Springs play a vital part of the river system, but to use assessments done in the EIS on page 58 of appendix K it states that when an assessment survey was done on different sites at the project

site the only sites that recorded any fauna were the spring sites. This then cements the fact that not only are the springs vitally important for the river but also for existing fauna and flora and the surrounding ecosystem to work in harmony. Blocking, plugging, diverting and drilling these springs will disrupt the very nature of these springs and cause potential and irreparable damage.

It would seem that the ongoing reference to insignificance of the springs and fauna by Regis leaves out the idea that all everything in the ecosystem needs to balance. Without one part of the ecosystem the other half of the ecosystem cannot exist.

Throughout the EIS Regis refers to the springs as ephemeral. This is true; however it is interesting to note that over the past four month period ranging from July through to October that the springs have not stopped flowing despite minimal rainfall for this area. So yes, the springs being ephemeral is correct however the springs have proven that in one of the most driest times they have remained open and feeding the river system vital to keeping the health of the system alive.

### Groundwater

On page 55 of appendix K under aquatic ecosystems it states that the ground dependent ecosystems Atlas identifies the Belubula River in their study including its tributaries has a high potential for groundwater dependence. This should not be neglected as part of an issue with blocking off and taking water from the system during the mines lifetime.

On page 135 of appendix K table 5.1 Typical Mine Water Affecting Activities Having The Potential to Cause Direct Affect, out of the 30 water affecting activities there were only six activities that we are not going to be affected by the mining. Reference must be made to the dire lack of water in rural New South Wales at this present time. **Any** activities that take place which will affect any inflows or groundwater systems which contribute to a significant water system such as the Lachlan River (which is part of the Murray Darling basin system) should be stopped immediately due to the precious nature of water available to rural New South Wales at this time of drought.

On page 138 of appendix K it states that *'following completion of mining there is a potential for evaporation concentration of salt within the pit void if it acts as a groundwater sink. If ground water levels recover sufficiently high, the pit void may end up acting as a flow through pit reducing the potential for evaporation concentration of salts within the open cut mine.* **Could Regis please explain if this is the case will the salts be part of the flow through the pit void? Where this salt in the water end up, considering there is documented evidence in the EIS that the water will then flow into the river system?**

On page 140 of appendix K it states that *"the TSF will be capped and contoured to facilitate surface water drainage, prevent any ponding of water and limit potential rainfall infiltration into the tailings."* It is disturbing to think that they are only going to limit potential rainfall infiltration and not stop it into the tailings. **Infiltration of rainfall into the TSF will contribute to seepage through the tailings dam wall and onto the river. Without pumps to pump the water back up to the tailings dam how will Regis manage the seepage? A channel seems very primitive and not very effective. Who will maintain the channel? Who will make sure the channel does not become blocked or washed away?**

There seems to be continual evidence throughout the EIS for example page 153 of appendix K where seepage into the river seems to be an acceptable operation. For example *"it is understood that seepage interception drain will continue to operate for some time after completion of mining until the water quality is at an acceptable level."* **Could you please explain how you will monitor this after the mine has closed and when you will test it and what is an acceptable level of water quality? How long will you be testing the water quality and how regularly will it be tested?**

Again more evidence on 170 of appendix K 6.3.2 Drawdown Related Impacts it states *"with minimal controls some seepage from the TSF is expected to enter the Belubula river downstream of the TSF embankment, however due to water table drawdown extending to the watercourse in the Belubula River area some seepage is expected to flow towards the open cut mine".* **This would indicate that some seepage is to go into the open cut mine however I would like to ask Regis where the rest of the water is going to seep and why is toxic tailings dam water allowed to seep into the Belubula River at all? Once it**



is in the river we will not be able to ever remove it. And this will then go on to contaminate Carcoar Dam, and then onto the Lachlan River system as well.

Apart from the obvious issues surrounding the open cut pit being at a depth of 460m and the resulting drawdown of surrounding water going into the pit not only during the mines lifetime but afterwards as well, **I would like to know on page 279 of the main document 9.5.2 where it states that ‘the final void water balance predicts the pit lake will recover to an elevation of around 900 and 2 M a HD. The pit lake is predicted to take around 400 years to reach this elevation’, why this is possibly acceptable?**

This would have to suggest that the water in surrounding springs underground aquifers and including the river will be drained to the pit for a totally unacceptable amount of time, and thus proving that the mines legacy amongst many other things will be the basically permanent lack of water in the Kings Plains and Belubula River area. It seems astonishing that the mine can come in and change **permanently**, the water flow and quality and quantity and then walk away and leave this destruction behind with no apparent concern. Not to mention that in the following paragraph it states that “*following approximately 400 years equilibrium is predicted to be reached and inflow to the void is predicted to remain the primary flow path of water approximately 97%.*” This would basically indicate that the river, underground water and spring systems will never recover to the way they are today. **What legacy is the mine leaving the future generations of the Blayney community? What right does this company have to permanently change the watercourse of this area?** There is no benefit having the water diverted to the pit for 400 years.

### Pipeline Water

The proposed pipeline water from Lithgow to Blayney to be used at the Mine site is of great concern. I would like to ask the question, **why when much documented evidence shows that this water has exceedingly high electrical conductivity or salinity levels, that the same stringent rules for the tailings dam have not been applied in the surrounding supposed freshwater sites?** This water has similar heavy metals to the TSF contents, for example arsenic, mercury, copper, boron, aluminium etc and yet it will be freely used around the mine site for dust suppression and stored in other locations around the project site to be used for processing at a later date. One of these sites is less than 150 m from the river with no apparent lining in the dam and runs parallel to the river for over 1 km. Obvious issues here include seepage into the river of this toxic water and straight into the river system where we will experience these toxins downstream, as well as seeping into the underground water system. **Why hasn’t Regis implemented the same rules in regards to lining the dams and making them impermeable to the water table and ground below to ensure that these toxins do not get released into the river system?**

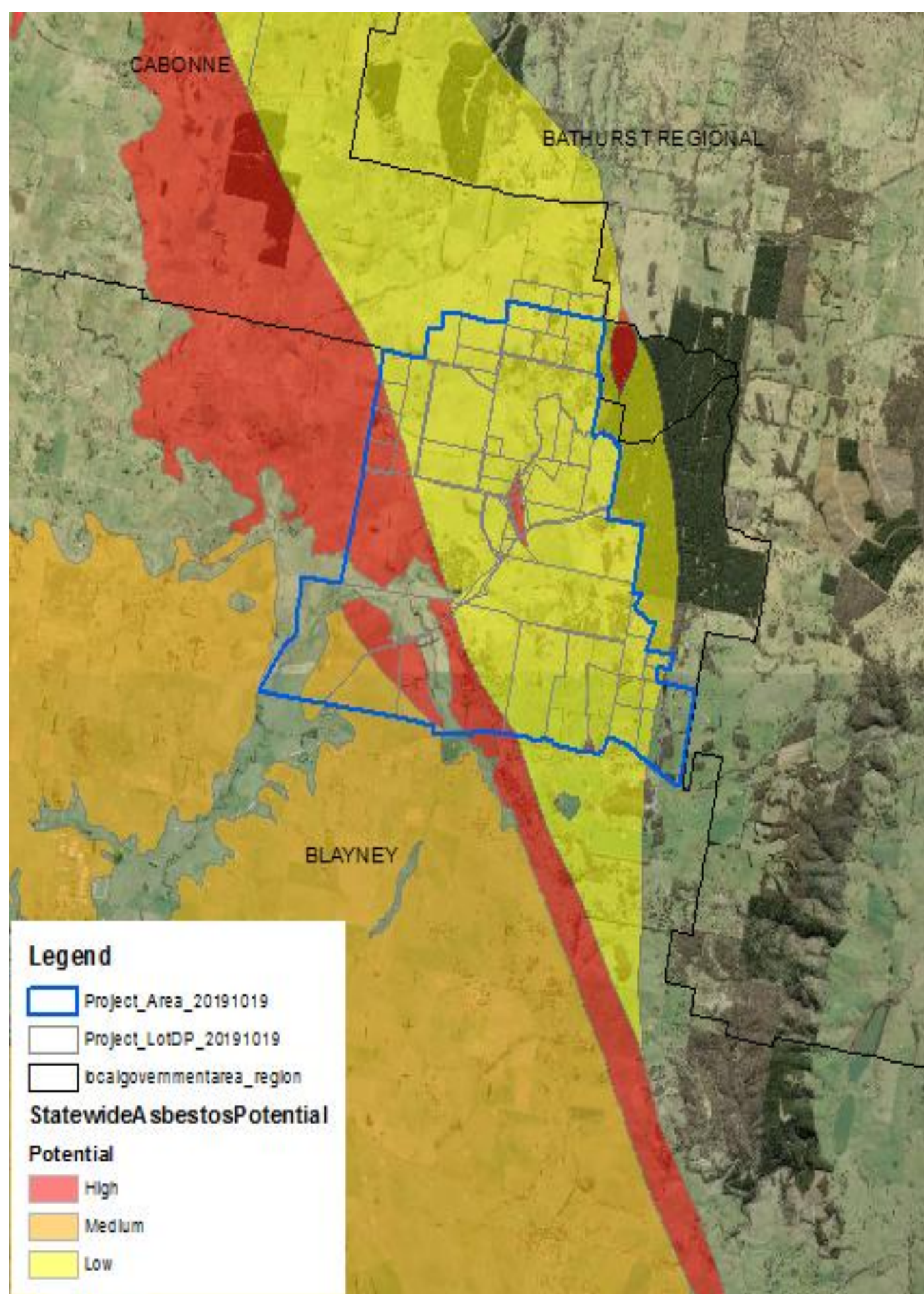
As for dust suppression **I would like to ask how Regis will control the salt that will stay on the ground once the water has evaporated over the mine site and how will they manage this salt build-up over the years?** This will eventually get into our river system and into our ground and permanently degrade and make this a barren landscape. Nothing can grow in a high saline soil and this is no different.

Other obvious issues is **how will Regis stop animals, including birds from drinking at the sites, as they mistaken these water storage dams as fresh water?**

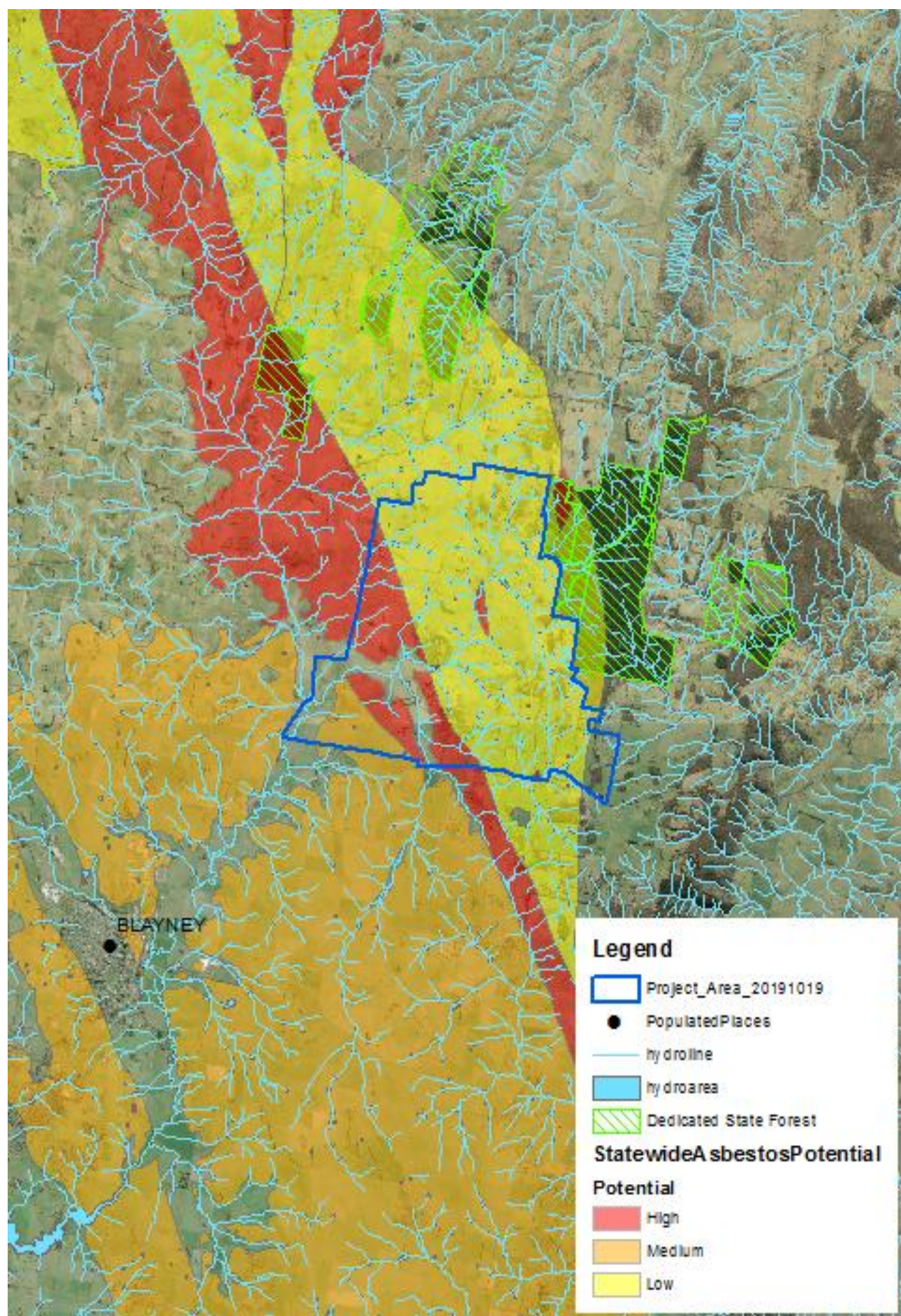
### Asbestos

On page 194 of the main report of the EIS it is stated “*The Anson Formation, over which the disturbance footprint associated with the mine development lies, has been categorised as having low asbestos potential.*” And also on page 211 it states “*the project area contains a low risk of the presence of naturally occurring asbestos.*” Therefore in two places in the EIS Regis has stated that there is only low asbestos potential. The following maps below however, overlay the Department’s map of potentially naturally occurring asbestos with the Project and were prepared by the Environmental Defenders Office (EDO). These maps show that there are potentially medium and high potential levels over the mine footprint. **Why has Regis omitted this very important and obvious information in the EIS?**

In addition to the above concerns around the TDF, water and the ecology of the area, please note that we have engaged the EDO of NSW for assistance in looking at some of the matters in the EIS. In response, we have received two independent reports from specialists which have been included as additional attachments to our submission.

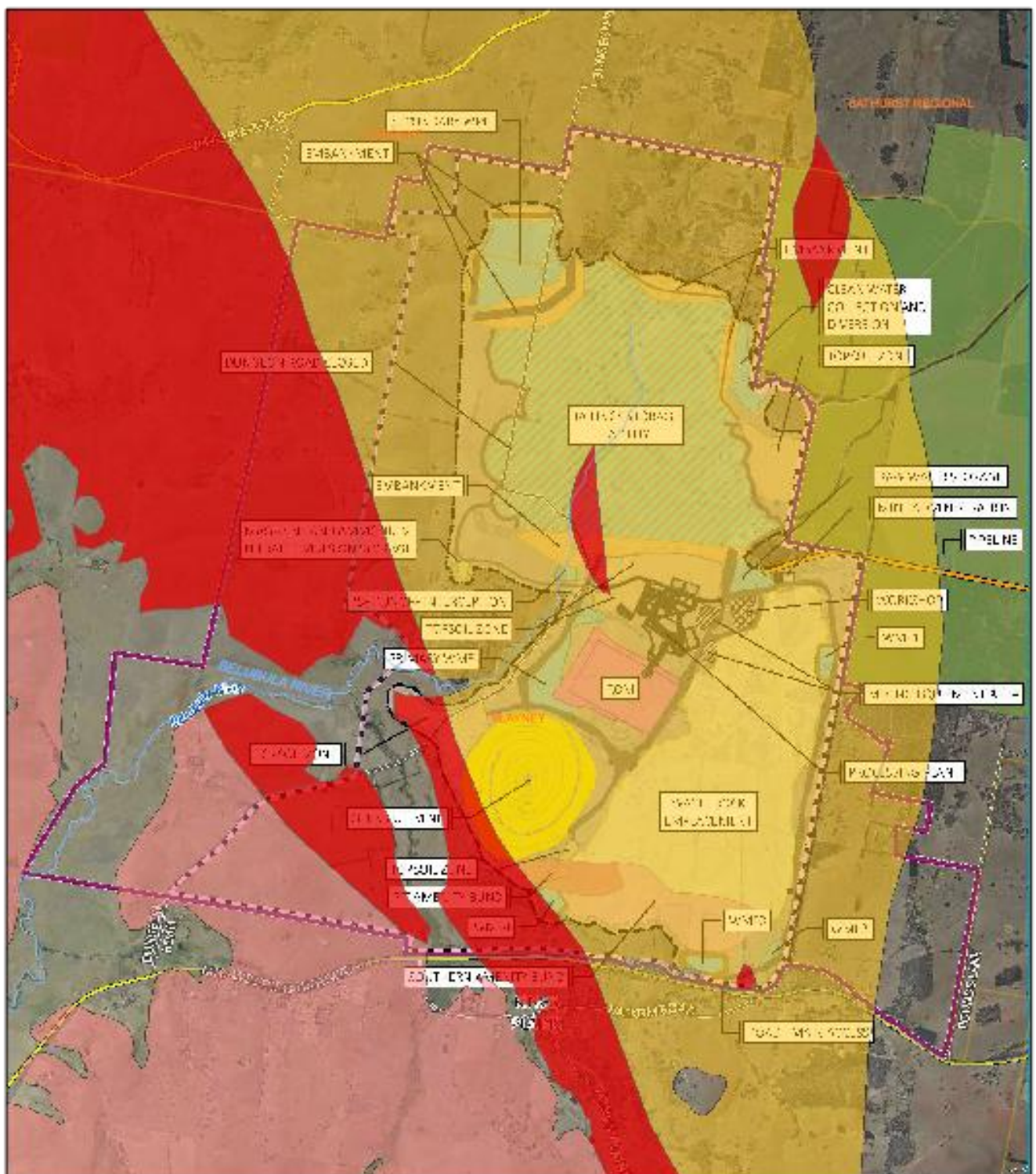













## McPhillamys Gold Project with Asbestos Potential Overlay

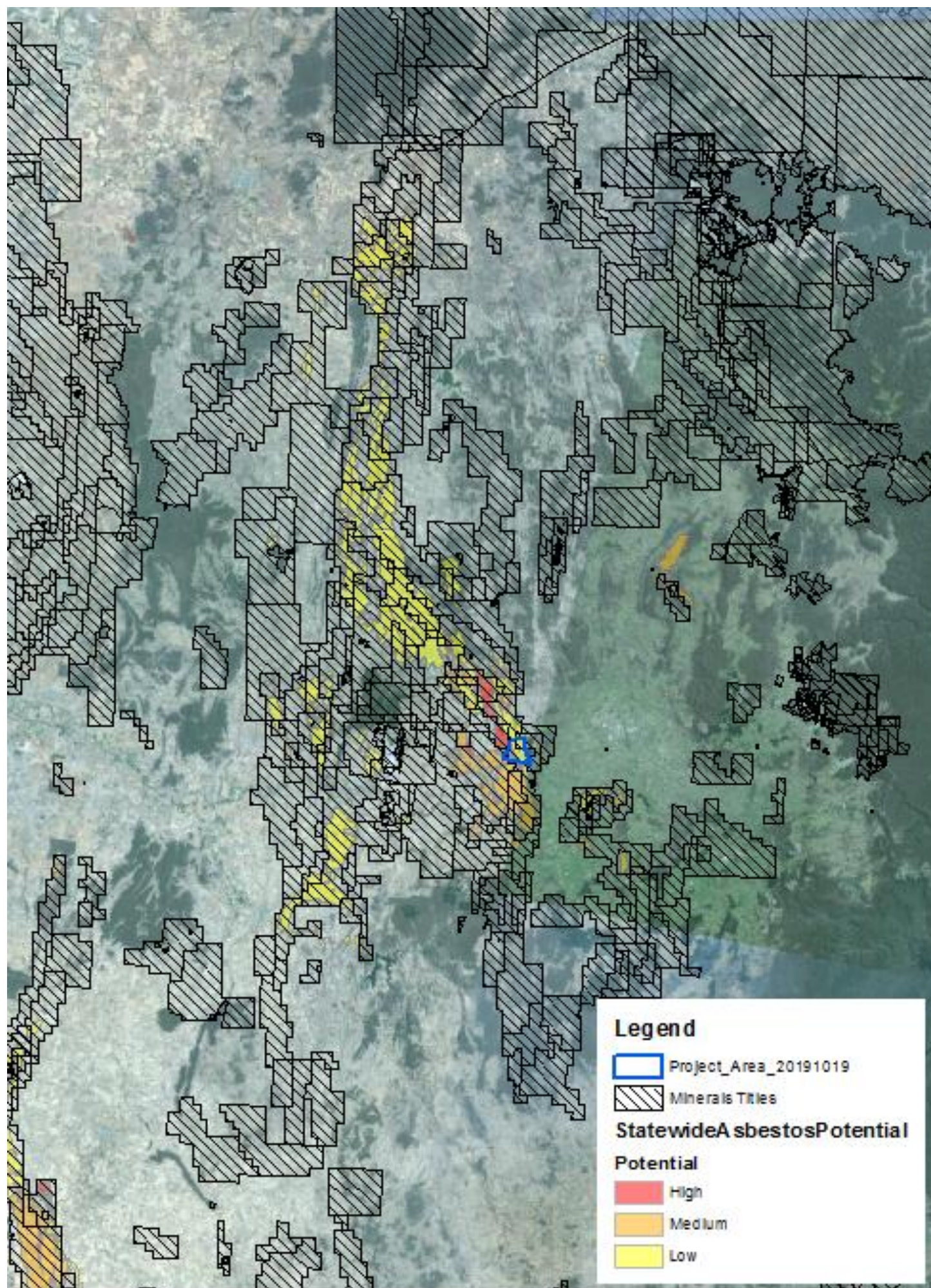


### Legend

-  Mining Lease Boundary  
 Mine Development Project Area  
 High Asbestos Potential - Statewide Data  
 Medium Asbestos Potential - Statewide Data  
 Low Asbestos Potential - Statewide Data









## **Noise & Vibration**

Our group's significant concern with noise and vibration impacts is that it's based on desktop models and averages. The below details and explains why we hold these concerns. We're also concerned that, relating to our opening comments, the true health impact of the noise impacts have been discounted or omitted completely simply due to models showing they meet some criteria by just 1db.

- Vibration is expected to be 'negligible' and is therefore not explored in detail in the EIS. How are the estimated impacts of 1.3mm/s (worst case) calculated? Does this include an assessment of the geological characterisation of the rock and ground formations, not only of the area to be blasted, but the surrounding area that would carry the vibrations?
- The impact of 115dBZ is stated to be equivalent to what livestock are already likely to experience, such as lightning strikes. An average lightning strike may be 120dBZ, but your average lightning strike doesn't occur at least once per day, every day for years as is proposed to occur for the blasting. When lightning strikes, livestock and domestic pets do get frightened. Not only are lightning strikes infrequent, when they occur many landowners relocate their livestock or shelter their domestic pets for their protection. Does the proponent expect nearby neighbours to do this for all livestock each and every time there is a blast?
- The noise monitoring devices were placed in their locations for nine days and all at the same time of year. This modelling is then used to determine the baseline noise readings for the area and is what the proponent is basing their impact assessments on. Although most readings are below the minimum regulatory set limits, the Kings Plains receivers have been identified as having an evening baseline reading of 31db. This extra db over the regulated 30 baseline means that residents are identified as being complied with from year 4 in the evening. However, if the baseline reading was to be 30, and therefore have a project noise trigger level (PNTL) of 35, the project would actually exceed the required level in year 4 for the 15 identified VLAMP receivers as well.
- It appears the project has an incredibly high sensitivity to noise variability. For example at project year 8, all receivers are identified as complying, however the db reading suggests the noise reading at night would be 35db. The regulated PNTL level is 35db. The proponent is claiming that after 8 years and the complete construction of their waste rock wall for a noise shield, their noise impact will be exactly what the regulated required noise management level is. This is too much of a coincidence and based on desktop modelling of a highly modified and strictly managed mine schedule. The DPIE needs to carry out their own assessment of noise emissions from the proposed equipment and mine schedule to determine the validity of these claims, given they match exactly to PNTL thresholds. With such a high sensitivity to the changes in db readings, we would expect that if the DPIE approves this proposal that at a minimum the proponent will be required to install noise monitoring devices at effectively every second receiver, given the topography changes to each property and the variation in exposure to the types of project area.
- Can the proponent please explain why, on various models in appendix L, receivers 16, 18 and 20 are listed as complying when they're within a cluster of other receivers that are marked as non-complying? These receivers are a matter of metres from other receivers marked as complying and yet there are variances with the compliance readings for them. We would recommend the DPIE come and see these properties for themselves to understand just how close these properties are to others that are identified as non-complying to understand our hesitation in believing the noise modelling.
- Does the noise modelling factor in the fact that once the amenity bund will be built, the Kings Plains locality will experience an increase in noise that rebounds from the permanent waste rock emplacement? If not, why not? Will this change the permanent noise amenity of the Kings Plains area, therefore meaning it will never return to its current amenity and state?
- The noise assessment states the impacts to receivers in Kings Plains will be 'moderate' and therefore only require mitigation components under a VLAMP agreement. However, given the limited monitoring performed, the fact there's only one weather station to gauge wind direction and speed, and the sensitivity of the db reading variations, most of the properties in Kings Plains are modelled to be just 1db below acquisition requirements of a VLAMP. It seems inequitable that

these residents not be covered by acquisition, given the ambiguity and estimates of the modelling.

- Page 54 of appendix L at 6.3.2 states the temperatures used for the modelling for noise dispersion. After an explanation that temperature inversions play an integral part on the dispersion of noise, the daytime temperature used is 20 degrees and the night temperature used is 10 degrees. With their own weather station, I would think the proponent would be well aware that our temperatures often struggle to get to double digits and nearly always in minus figures during the nights in through winter. Even in October at the time of writing this the forecast for the week was lows all below 5 degrees. There appears to be no justification as to why those temperatures were used, but it is clear that changes in temperatures can significantly affect the dispersion of noise. We request that the proponent explain why those temperatures were used, and preferably, provide noise modelling for different seasons of the year. Given the great variation in our temperatures over the year, we believe the only way to accurately model the noise impacts is to model them over each season showing the impacts the significant temperature changes have on the noise dispersion. Given the proximity of near neighbours, the sensitivity of the db readings and requirements of compliance, accurate noise monitoring is a vital component to proponents claim that no one will be negatively impacted.
- Page 49 of appendix L explains that without significant proactive management of the mining fleet, reduced haulage, real time noise monitoring, meteorological predictions and successful suppression of vehicles and equipment, there will be significant noise exceedances over the first four years at a minimum. This means that the results modelled are a best case scenario assuming the proponent is able to control all aspects of their employees, vehicles, equipment and weather. If one employee decides to drive to close to another dump truck, the noise predictions will be exceeded. This won't last for 15 minutes and therefore won't create a breach of mining conditions, but this might happen five, six or more times. This could wake up nearby residents that then can't return to sleep. The health impacts due to a lack of sleep are well publicised and listed by the EPA. The same result would happen if an unpredicted wind event occurs and changes the direction of the noise dispersion. The proponent claims they will monitor this with their own noise monitors in the area, but this will just provide reactive solutions, after the resident has been disturbed.
- The entire noise modelling assertions are based on and stated on the principles of averages. The modelled average noise exceedances for properties not listed to be covered by VLAMP are either equal to, or 1 or 2 db lower than the required PNTL. Additionally, several of the residences that are shown as being complied with after 4 years are only being complied by 1 or 2 db. If the average numbers are so close to compliance thresholds, it means there will be several occurrences of noise exceeding the modelled numbers. This means more residents should be covered by the VLAMP, the VLAMP should apply for a longer period, and acquisition should form part of the VLAMP.
- Page 54 of appendix L at 6.3.3 states that due to typical mining operations emitting relatively steady noise emissions, tonality was not considered to be applicable and therefore no consideration for modifying factors had been made. Heavy mine vehicles and machinery emit very low frequency noise which is not being monitored. This low frequency noise is an important source of disturbance because its wavelength is the type that resonates in cavities such as rooms of houses, the skull and chest cavities. Additionally, the movements and vehicle requirements for the construction of the waste rock emplacement and amenity bunds would not be steady and constant. This would require equipment to be under high revolutions irregularly as they excavate, move, sculpt and compact the mounds. These activities will not be regular or steady and should be assessed.
- On page 55 at 6.4 of appendix L, it states that the US EPA road traffic calculation was used to predict noise levels from construction vehicles. This method is claimed to be accepted for low frequency noise emissions. The report then continues on page 80 at 7.3 to state that they estimate 25 light vehicles and 20 heavy vehicles per hour are expected to enter/exit the site and be mobile on the site. 45 vehicles per hour is not low frequency. Given there is a resident just a football kick away from the intersection, a proponent that is acting in the best interest of the community would have put a noise monitoring device at that resident to get an accurate current

noise reading. You can then accurately estimate the noise impact. Table 38 shows just a 0.6db increase in noise. Considering the normal traffic flow past this receiver is a steady flow of vehicles at 100km and therefore relatively low RPM with no brake or accelerator application, it's next to impossible to believe that creating an intersection whereby 45 vehicles per hour braking on a decent and accelerating up an incline won't add more than 0.6db to that resident. The proponent should be forced to take at least 3 months noise monitoring data from this resident's location for an accurate estimate a change to traffic implications.

- On page 57 of appendix L at 6.5.2, why were 1140 for "Kg" and a value of 1.6 for "B" adopted?
- Can the proponent explain how exactly they're going to make noise readings after 8 years lower than what the current noise readings are? i.e. MAC03 noise monitor was on the property of R25 for a period 9 days. Of the nine days, only 3 of them had noise readings below 34db. In the modelling of appendix D of appendix L, R25 is shown that the day noise readings will be 34db. Additionally, EMM Loc3 read a daytime baseline of 33db at R46, yet R46 is shown to have db readings of 25db in year, in fact it's predicted to be below the baseline from year 2 onward. And finally (without spending all of our time looking at each one), MAC03 had average baseline of 39.6db during the day, and yet at appendix D, it's actually predicted always be below this, starting at 35db in the first year. We're perplexed as to how the proponent actually believes they can reduce noise below the point it currently is with no mine. Without the knowledge of how the modelling works, it would appear as though the predictions are fabricated and baseless.
- Current night time noise readings for the Kings Plains area based on just a 9 day survey average at 24db. Even after the construction of their amenity bunds and waste rock wall, the night time noise is predicted to be 34db, equivalent to current day time levels and still 10db louder than what the community are currently used. Regardless of if it meets regulatory requirements, you can't expect an entire community to put up with a, best case scenario, 10db long term increase in their night time noise. This isn't a short term, sporadic increase. These residents live in this area for its serenity. They could live 5 minutes down the road in town if they want, but they chose the quiet rural environment. And if this is approved, they would have endure the next 12 years of their lives, every single day with a significant increase in noise to what they're used to, and what they live for.
- VLAMP mitigation only recommends mitigation strategies for dwellings and small garden areas. The properties that surround the mine are all on acres. These residents live here for the outdoor lifestyle. How can the proponent mitigate their outdoor entertaining areas that can be hundreds of metres in size? These residents own property acres of size, and they'll be restricted to using just a few hundred square metres to be 'comfortable'. This is not acceptable.
- The modelling in appendix D of appendix L shows that receivers 16 and 17 far exceed the regulatory allowable level for the first 18 months, best case scenario assuming weather, workforce and strategic plans permit construction to progress as planned. In fact, they breach the regulated levels by more than 5db. Yet this disregarded due to it being 'short term' and of a construction nature. The first 6 months are intended to be construction hours only. However these residents are then expected to deal with 12 months (best case) of noise 5db and more above PNTL, 24 hours per day, and 7 days per week. If this wasn't serious, it would be laughable. And for a company claiming to be part of the community and operating in the best interest of the community, this is just disgusting. These residents are not being looked after.
- There were overwhelming suggestions from locals for the proponent to relocate the entrance to the site further east along the Mid Western Highway, closer to the dual lane section approximately half a km east of the Eastern Walkom Rd intersection. These suggestions have been completely ignored with no explanation as to why. These suggestions arose from the fact it has a clearer line of sight for traffic in an Eastern direction, is not as close to residents and would not require heavy vehicles to brake around a blind bend on a descending piece of road.
- On page 87 at 8.2 of appendix L, the proponent claims to be "currently working with affected landholders to develop negotiated agreements". None of the 15 receivers that are recommended to be covered by a VLAMP were advised they had been identified in the EIS as such. It took a call from our President to the company representatives to which we were advised this would happen in the next 2-3 weeks. Coincidentally, on October 20<sup>th</sup>, our president received a call from one of the 15 receivers who stated they still hadn't been spoken to by the proponent. They were anxious



and weren't sure what it meant or what to do as there was only 4 days left for submissions and they weren't even sure what they covered by. This continues to speak to the proponent's inability to competently consult with the community, and proves the proponent is not working to be a part of the community or keep their near neighbours informed.

- The proponent claims they will predict noise exceedances with use of monitors and they can see when noise levels approach threshold limits and adjust their operation accordingly. Can you please define "approach"? Will it be when you're within 2db of the upper limit, 1db of the upper limit, and subsequently how can you be sure there's sufficient time to adjust your operations to prevent an exceedance?
- It would appear reasonable that a dilapidation/structural survey be required to be carried out at all properties within 3km of the outer pit boundary as a requirement to assess if any damage to properties is occurring due to the operations.
- Will the Noise Management Plan be circulated with any residents that so wish to be informed of it? Thus ensuring all parties are aware of your intentions, processes and actions.
- Page 92 of appendix L at 8.5 suggests Regis "may" complete the suggested methods of noise monitoring and mitigation. Dot point 2 states "where feasible, avoid operations adjacent to residential receivers between 6pm to 7am". Regis has continuously stated in this EIS that the feasibility of decisions is dependent on the economic benefit. Therefore if positioned with the two options of: 1. Reduce operations to ensure noise readings remain below suggested for nearby residents at the cost of quicker production; or 2. Continue operating and risk breaching noise estimates to produce more resource at a faster rate; would it not be more feasible to take option 2, and therefore at no point reduce production?

### **Air Quality and Emissions**

Our primary concern with the Air Quality and Emissions report is that it's based on desktop modelling, one weather station at the proposed site, and reports from stations approximately 30km away. Regis owns in excess of 3,000ha of land and has only used 1 weather station for gathering information from their own property. Given the topography of the area around Vittoria, Fitzgeralds Mount, Blayney, Kings Plains and Guyong, there are considerable variances in weather patterns between the locations. The air quality report uses information from Orange and Bathurst as there's insufficient data available from nearby to the project area. Orange is over 30km away and Bathurst is around 30km away and is also 300m lower elevation than the mine project area. Both Orange and Bathurst often experience significantly varying weather than Kings Plains or Blayney. Bathurst carries its fog for significantly longer periods during the winter days and the temperature varies often be 3 or more degrees which impacts on movements of noise and air quality due to the changes in temperature inversions. To get an accurate reading of wind directions, speeds and other meteorological impacts, the proponent should be required to establish two more weather stations; one on the northern border of their property near the Mitchell Hwy and Vittoria Rd, and one central in their project area, around the proposed processing plant.

Our secondary concern with the Air Quality and Emissions report is that it appears to focus on dust from the pit activities and ignores the true impacts of the construction and exposure of the waste rock emplacement and Tailings Storage Facility. The Waste Rock Emplacement is just a matter of a football kick from a handful of properties, and a football field for a lot of others. On a dry day with the regular breeze that Kings Plains experiences, the proponent is claiming that the dust and toxic particulates that will venture onto neighbouring properties will be within government regulated guidelines. They admit the impact will exceed current air quality levels, but will be within the EPA requirements. With reference to the health status and social attributed of the Kings Plains community, any increase in pollutant air quality should be unacceptable form a proponent claiming to be a part of the community.

In addition to the above, there doesn't seem to be any reference to the impact to the tributaries of the Belubula River of pollutant air particulates falling into the streams. Considering water will hold the air pollutants and carry it downstream, what are impacts of the pollutant dust falling into the river, flowing downstream into the recreational Carcoar Dam, flowing further to be used by farmers and irrigators and finally forming part of the Lachlan River?

There are claims that with vegetation efforts after the mine ceases operation, the contribution to the absorption of CO2 emissions would exceed the emissions produced by the project after a couple of decades. This assertion is unjustified as the specifics of their rehabilitation have not, and will not be disclosed until 5 years from closure with the development of the rehabilitation plan. At best, this assertion is a desire, but even with a plan, they cannot guarantee that, after the removal of existing established vegetation that is currently performing the task of homing fauna, supplying food and absorbing CO2 emissions, planting new vegetation that will require considerable time to get to the level of existing vegetation and may not even succeed in doing so, will compensate for the emissions they create.

Additionally, there seems to be no reference to the impact on motorists using the Mid Western Highway even though well over 3km of the highway is predicted to be exposed to up to the EPA limit in Figure E.8 of App M. Although a main arterial highway for travellers, you will note from App T that there is a very proportion of inward and outward travel of workers on a daily basis with Bathurst. The predominant users of the highway use it everyday at least twice per day. This means their exposure will not be limited or short; it will be recurring and sustained. Why has this not been considered?

About 42% of the mine waste rock is described in the EIS as potentially acid forming (PAF). There is no justification to support the proponents claim that they can sufficiently cover this. The proponent should be forced to provide a detailed schedule of what product and material will be stored where, and at what points in time to prove their claim that they will have sufficient non PAF material as they claim. If the PAF comes into contact with rain or an elevated water table situated beneath the waste rock, it may begin to release Sulphur Dioxide and the proponent has not supplied any strategies to deal with a situation like this, should it occur. An Acid Drainage Fact Sheet sourced from the First National Environmental Health Innovation Health Network states that: 'People living near a hazardous site containing sulphuric acid are at risk of breathing contaminated air - spending time outdoors and exercising increases the risk of exposure to sulphuric acid.' With reference to app T, all neighbouring properties to the proposal lead a life of spending time outdoors on their acres of property.

How does the proponent intend to keep dust suppressed during the night without water tanker vehicles operating to keep the noise levels in line with models?

### **Biodiversity and Aquatic Ecology**

Our observations of the proponents biodiversity and aquatic assessments is that they have done the bare minimum to tick the boxes required by regulation and the strategies for data collection are so insufficient that we are convinced they have omitted various species of animals from their assessments. Firstly, they only assessed what protected species that may be in the river but have not assessed all possible species that could be inhabiting the river. The proponent claims they will plan for aquatic offsets and an erosion and sediment plan, but why is this not part of the EIS for approval?

From appendix N, items raised as a concern for us include the following:

#### **FLORA & FAUNA;**

1. The project will be covering an area of 2,500Ha of land. This being predominately good agricultural land. This land also encompasses fragmented forests of Native timber and grasses. Much of this Timber is old growth eucalypts with hollows and sources of habitat for birds and animals.
2. It is stated in the EIS that 132.36 Ha of native vegetation will be removed. Of this there will be the removal of 44.25 HA of Blakely's Red Gum – White Box – Yellow Box and dry grasslands of the South East Highlands. These species are considered critically endangered. This equals a 3.9% reduction within this locality. (Further reduction of this native vegetation in this area that has previously been over cleared is not acceptable as this further fragments these species of vegetation and habitat for native animals that still use this area.)
3. Section 5 deals with threatened species that may dwell in this project area. These species inhabit this type of woodland and may be found in the project area and are listed as vulnerable and as such incur offset credit points. There are two species confirmed in this area that incur significant Biodiversity offset credit points. Squirrel Glider (2,845 offset Credits required) and Koala (1, 970

offset Credits required). There is nothing that indicates whether the colonies have been identified as being biologically different or the same. If biologically different to each other this may lead to the extinction of a species. Has the proponent carried this out? The Project Area has both primary and secondary trees for Koala foraging and Habitat. As stated in Section 8.4 of the EIS there will be a reduction of 75.77 Ha of Koala Trees and potential Habitat. It is also states in the EIS that a Koala was found in the project area, but it states that the nearby Koala Colony is not an important colony. It could be viewed that any Koala colonies in this area are important and should be held in high regard and all efforts should be expended in their protection. There has been heightened media campaigns in recent times, even from insurance companies in regards to growing and maintaining Koala habitat and feed trees to stem the decline in populations. There has recently been another Koala found on a property at Kings Plains adjacent to the Mine site.

4. Regis has purchased land 3km South West of Blayney as an offset area to be held in perpetuity to offset the credits points accrued, as Nobel as this may seem, this doesn't provide any useful habitat for any of the wildlife that will be effected by the habitat destruction in the area of the proposed mine and they will not be able to travel approximately 11 km past an operational mine, tailings dam and the town of Blayney to get to this offset area.
5. Modelling and estimations appear to be based on short term effective field studies. Although they claim have only located one Koala, they haven't been actively looking with a targeted strategy.
6. There seems to be no assessment of the fact the project area lies between 2 arterial highways, and if blasting and 24 hour operations were to commence and push out the existing habitat, they would need to cross either the Mitchell Hwy or Mid Western Hwy to escape. A detailed survey of all wildlife needs to be carried out to determine the outmigration of animals, and efforts should be made to manage this to avoid increases in animals crossing the highway creating a risk to motorists.
7. The assessment seems to focus on the direct footprint of habitat that will be removed from the project and claims that is the only impact it will have on the biodiversity of the site. Why does the assessment not include a 'buffer' or area around the project site that will also be vacated by local wildlife? Wildlife will not move from their tree being destroyed to the one next to it that remains if it means that new tree is now within 100m of blasting, noisy machinery, significant dust and intrusive lighting.
8. Given there will be a series of new water management facilities around the site, which will look like drinking dams to the animals, has an assessment been carried out for any wildlife that will drink from either these WMFs, or even the toxic tailings Dam? It should be.

In summary, the area is fragmented and has been under pressure from agricultural practice over many generations, however there has not been any further vegetation removal for quite a number of years and with sound land management, agriculture and biodiversity can coexist. The native flora and fauna are still hanging in and thriving and has the potential to improve and increase. This is not the case with what will happen with clearing and destruction that will come with the mine and the EIS has stated that the land will never be as it is now; there will be a reduction in the quality of the land.

The proponent has stated that they are and will plant native plants along the border of the project site to create wildlife corridor's and habitat, but it will be many years before a lot of this is mature enough for use by any of the animals that need to migrate. It takes most eucalypts 150 to 200 years of growth before they reach the stage of hollows and structure to provide good habitat.

This area is also frequented by many other animals than previously mentioned that also nest and forage, these are: Kangaroos, Wallabies, Wallaroos, Wombats, Echidnas, Sulphur Crested Cockatoos, Yellow Tailed Black Cockatoo, King Parrots, Crimson Rosella, Eastern Rosella, Various Parrots, Kookaburras and various snakes and Lizards. All these birds and animals move around this area, feeding and nesting in the various hollows and trees. The mine and Tailings Dam will severely curtail these animals' activities. And will change the entire nature of the Kings Plains area. Just two days before typing this, a flock of no less than 30 yellow tailed black cockatoos flew over the mine site heading south to Kings Plains and came to rest in some native trees.

From appendix O, items that were raised as concerns for us, and areas for attention from the DPIE are:

1. The Summary states that there were Five (5) sites identified as Highly Sensitive potential fish habitat sites, and medium waterway type and medium waterway class, they say that it would unlikely support species of conservation significance. Considering the last two years have been significantly dry and the river has been unusually dry the outmigration of usual animals will mean that the results understate what would ordinarily be inhabiting the area on an average year.
2. 3.2 states that the field surveys were conducted over a time period of just 3 days in a year with minimal rainfall. Over the 3 days, fifteen different sites were surveyed which shows just how little time was spent at each site completing the surveys. This type of survey cannot return accurate results. Survey need to be covering multiple periods of days over multiple seasons to ensure it captures wildlife that only become mobile in certain conditions. Realistically, results determined from such a short term study on an isolated area of the waterway should be regarded as though the assessment didn't take place at all.
3. ES3.2 states how the mine project can affect habitat and ecology downstream from the project area. Again, there are numerous potential risks and impacts and open admissions that there will be impacts but the proponent classifies them as minimal.
4. This project is offering no improvement to the aquatic ecology of the Belubula River and instead has confirmed negative and long lasting impacts and the potential for further negative impacts if the project is managed appropriately. It seems socially inequitable to approve a proposal that will definitely cause minimal damage and potentially cause major damage to a system that would otherwise be left for generations to enjoy. If there is any breach this has a very high potential of creating ecological disaster for the Belubula River Carcoar Dam and the Lachlan River, and its aquatic biodiversity. It is widely understood that aquatic creatures are very susceptible to pollutants and heavy metals. This could also lead to contamination of the food chain.
5. Very little consideration appears to be given to the Water Management Facilities construction. In particular, the primary WMF is less than 100m from what will continue to be the Belubula River. Given what is stored in this facility is toxic water filled with contaminants from the Lithgow imports, why is there no assessment of the potential damage to the waterway if this WMF was to leak, seep or overflow into the Belubula River?

### **Traffic & Transport**

(Information from: V1A, p.ES p.14, p. 462- 475; V7 APP. Q p.(i) – (v), 1 – 32, +19 unnumbered)

The EARs requirements and the many assessment recommendations made by the RMS have led the proponent to treat traffic issues in some detail. However some matters need further consideration.

1. The proposed site access from the Mid Western Highway is in a high speed location on a gradient curve. Vehicles entering the site will almost immediately make a 90 degree right turn in front of a waste water dam (WM 3) and then a more sweeping left turn beside WM2 before starting a 3 km ascent up the haul road to the car park. However, it seems clear that any problem within the site close to the entry (e.g. a heavy vehicle experiencing difficulty making the 90 degree turn) could lead to the rapid formation of queues in the turning lanes on the Highway and a potentially dangerous situation. This could be obviated if the entry from the Highway was one-way and with exit for example via Dungeon Road. The above suggestion would mitigate the difficulties experienced by vehicles trying to enter the Highway from Walkom Road (east intersection) proceeding towards the east (Bathurst) during the hour or so of shift changeovers. With entry only off the Highway, it would reduce light pollution for nearby Southern residents. However, if the above was adopted, appropriate studies would need to be carried out to ensure no other residents are impacted by this change. Given the proponent's land ownership encompasses Dungeon Rd, we think it would be at least less than the impact departing onto the highway.
2. Although the dangers of the frequently foggy conditions around Kings Plains has been recognised and fog warning signs are planned, the EIS has not addressed the potentially dangerous snow and ice conditions that occur at the Eastern Walkom Rd intersection several times every winter.
3. Visual difficulties for westerly traffic arising from alignment of the setting sun and the Highway are another problem at the proposed intersection. Too many signs can in itself be distracting to drivers, and special care should be taken to ensure any signage does not interfere with sight from existing property access points. A potential method for assisting with this could be a speed

restriction zone (80 kph) in the vicinity of the mine entrance and should be discussed with RMS, especially given HV leaving the site heading East would be trying to gain speed up a blind curve incline. Any vehicle doing 100km/h up the curve would not have adequate time to reduce speed to prevent an accident.

4. In the EIS the traffic study area is from Walkom Road (east) to Dungeon Road. This should be extended eastward to at least Pounds Lane and probably Kellys Road due to the visual distraction of the waste rock emplacement for motorists and limited vision, especially for vehicles turning out of both the roads.
5. We wonder if the re-routing of traffic off Vittoria and Guyong roads on to the route from the north by way of Millthorpe and Blayney has been well thought through. Vittoria Rd is used by generally fast-moving vehicles travelling between Cadia and Bathurst and Guyong Rd is narrow and has been the site of a tragic accident. Traffic along the EIS preferred route (mandatory for contractors, encouraged for employees) through Millthorpe and Blayney would involve travel down urban streets with adjacent residences that will not be welcome at 5.45am especially on dark winter mornings. There may also be traffic delays associated with shift changes at the Nestle Purina pet food facility, the railway crossing in Blayney, and at intersections where the additional traffic is entering the Mid Western Highway that is also Blayney's main business street.
6. Although the EIS (V7 AP Q p.31) maintains that HV impacts on network roads will be 'minimal' we suggest that at least Dungeon Road will suffer unless the haul road entrance from the Highway is completed before the start of construction activities. Major plant necessary for construction activity and heavy plant and excavation equipment will be required in the first three months of construction and in the 3<sup>rd</sup> month HV transport is estimated to peak – at this time Dungeon Rd will be the only entrance to the site (V1A, p.468) and as mostly unsealed and not in good repair is likely to not only suffer damage, but lead to accidents.
7. No consideration seems to be given to the risk of travellers on Guyong road being distracted from not only the vehicles operating on the south side of the waste rock emplacement, but also the processing plant. This road is already narrow, high speed and has little safety measures in place.
8. VP 2 of appendix S shows traffic travelling East along the Mid Western Highway will be greeted with the sight of vehicles and equipment building an amenity bund. Has the traffic implication been considered with this, given this visual occurs as drivers enter a blind bend in the road on a crest, that leads to the turning lane to enter Walkom Rd (west)? Someone would easily be distracted by what's going on the left and miss turning the corner, or be distracted with what's happening on the left and not notice a car in front of them slowing to enter the downhill turning lane into Walkom Rd.

### **Visual Impacts**

Firstly, we would like to note that many members have raised concerns over the proponent's efforts for visual mitigation. The proponent continues to advise those nearby that the best way to mitigate the visual impact is to block their current views. As stated in appendix T, the neighbours of the proponent live in the area for a specific reason. They have chosen not to purchase near other buildings, near warehouses, near industrial areas, or near anything that obscures their view of the rural landscape. The proponent suggesting that residents plant trees to block out views and use screening mechanisms to shield windows that face their area are not only insulting, it's disrespectful and speaks further to the proponents lack of understanding of what the local community's values are, and their inability to work with their neighbours appropriately. Some points noted from the appendix S are:

1. A near-universal concern expressed by residents within 2.5kms of the mine site boundary is the visual effects of the mine development. Residents further north, currently afforded some screening by the pines of the Vittoria State Forest, will be protected much less as the mature trees currently being logged are cleared.
2. The impact of significant visual parameters have been recorded in Tables in Appendix S. Levels for or in most view sectors indicate high undesirable affects for much of mine life with the worst aggregate result being those in the south view sector up until the end of mining activity. Longer term improvements will depend very much on the success of revegetation, especially the rate of establishment and growth of native woodland species.

3. Although assessments of views from individual properties have been made and suggestions that these include the 'worst cases' most involve horizontal or upward views with no representative residences at higher altitudes (950+m) that look down on parts of the mine site. This understates the visual impact of the proposal and the proponent should be forced to gather more data and pictures from a range of topographical properties showing the range of impacts.
4. Also understated in the assessment is the way in which rural people view their landscape. It is not just as an individual 'snapshot' of some prominent feature but as one looks at an extensive mural from varying viewpoints. But our landscapes also have depth. Our landscape is multi-dimensional (indeed 4-dimensional taking into account seasonal changes in vegetation, cloud patterns, the differing grass colours and their masking by drought, snow, frost and rarely fire or gushing streams). A stately tree 100 metres from a home, an old horse in the front paddock, and a hillside of black cattle are as much an element in the landscape as a treed ridge a couple of kms removed. Replacement of elements such as these by a mine and its infer-structure is tragic.
5. Construction of the bunds will take 4 years and during this time what is now gentle pastured slopes and mature native and exotic windbreaks lapping either side of a prominent ridge will be progressively buried beneath rubble from the gradually expanding open cut pit. This will be a dramatic landscape change – two substantial residences will be completely buried, the green cover of the paddocks first scraped of their topsoil and changed from green to red-brown to be then covered by at first, jumbled but then mechanically heaped into a terraced order. Native paddock trees will have disappeared and a lunar landscape created. While attempts may be made to encourage the growth of grass on the bunds success will depend very much on adequate rainfall and progress will be slow because of their southern slope away from the winter sun.
6. Dumping from haulage trucks, will gradually extend it north from the bunds accompanied by clouds of dust generated by dumping and spreading. As it grows and builds up the skyline northward it will become an increasing feature of the western view sector along with the earthworks associated with the ROM and tailings.
7. Vehicles travelling into the mine site in the hours of darkness which significantly overlap shift changeover periods. There has been no analysis of the effect of the headlight beam paths of vehicles using the access road with the potential for beams to sweep nearby residences close to the highway intersection and south west as they move around the bend before the 90 degree turn to re-enter the highway.
8. There also seems to be very little attention given to the impacts on Guyong Rd. Given Guyong Rd looks at the Southern and Western components of the waste rock emplacement and this is where all vehicles will move to at night or times of wind to reduce noise on the Kings Plains residents, why are there no assessments for this imposition on the Guyong Rd residents and traffic?
9. Another issue with the visual assessment is the exaggeration of vegetation on disturbed areas. All of the images predicting the revegetation of the affected landforms show green to light green areas with trees and grown vegetation from year 8. We're left wondering exactly how this vegetation will grow, with what water? Is the proponent watering the bunds as they construct them and if so with what water? Given the limited available material of topsoil, it's difficult to believe the landform will vegetate as quickly as they claim, and with little to no rain, we can only assume it would remain a wall of waste rock and dust. The BoM assessment of future weather indicates this region, along with much else of southeast Australia will be hotter, drier and susceptible to more extreme weather events.

Appendix S does not shy away from the fact there will be both direct and indirect lighting intrusion to not only nearby neighbours, but Blayney as well. What it doesn't do sufficiently is accurately represent this impact. The residents in the project area are used to a naturally black sky at night. App T details the value placed on the night sky and its significance to the area. We encourage members of the DPIE to attend the area at night to truly understand the impact even a small amount of lighting will have, let a lone 24 hour operating mine. Interestingly there are no modelled images for how the lighting impact will look, and it also doesn't go over the health and lifestyle impacts of these intrusions. Exposure to light 24 hours a day decreases the body's production of the sleep-inducing hormone, melatonin ([www.sleepfoundation.org](http://www.sleepfoundation.org)). 'Melatonin is a natural hormone that regulates sleep-wake cycles. Light decreases melatonin production and signals to the body to stay awake. Lack of sleep can affect your

immune system. In the long term this increases your risk of obesity, diabetes and cardiovascular disease' ([www.mayoclinic.org](http://www.mayoclinic.org)). This risks neighbours affected by the light intrusion to suffer from Insomnia which leads to serious health issues. Poor sleep patterns in children lead to poorer learning outcomes, and in adults, leads to lower economic productivity. A Deloitte Access Economics calculation has estimated the cost of inadequate sleep to the Australian Economy at \$66.3B in the 2017 year alone. ([https://www.sleephealthfoundation.org.au/files/Asleep\\_on\\_the\\_job/Asleep\\_on\\_the\\_Job\\_SHF\\_report-WEB\\_small.pdf](https://www.sleephealthfoundation.org.au/files/Asleep_on_the_job/Asleep_on_the_Job_SHF_report-WEB_small.pdf))

### **Social Impact Assessment**

Of greatest concern with the social impact assessment is that the management of impacts is entirely based on the proponent and what they do compared to what they say they will. As previously outlined at some earlier sections and as you will see further on, the proponent has already lied and been proven to not follow through with their assertions so we demand that if this proposal is approved, our group members have no trust that the proponent will carry out the management plan as stipulated by Hansen Bailey. If one was to be required as part of an approval, it would need to be detailed, implemented with community consultation and the proponent held accountable to the equivalent level of an EPA breach at a minimum. Points that we want noted from the Social Impact Assessment are:

1. The social impact assessment in itself openly states that there are over 230 residents within 2km of the Mine Project Area. On page 48 of app T at 4.3.1, it states that "many residents of the Kings Plains locality perceive that the magnitude of these impacts will be such that they will no longer desire to live in the locality".
2. Page vii, para 4 states Mining is a major part of the area, but the average salary of the Blayney LGA population suggests it isn't, and the closest mine is 30km away and closer to Orange. This section also goes on to state that Tourism is a growing sector in Blayney. Increasing as a weekend and short stay location with its heritage and nearby townships as key attractions. Travellers and tourists will not want to stay in a town that neighbours an open cut 24/7 mine. It will diminish all of the hard work of the Blayney Council and community in building the town as a tourism destination. In extension to this, page ix admits that housing short term accommodation for the temporary construction workforce will consume accommodation otherwise used by tourists. This will hinder the long term local economy as it removes tourism and tourists will naturally divert to other areas with a limited chance of returning to Blayney in later years.
3. Page viii under social impacts experienced to date ignore the countless complaints made about the lack of consultation from the proponent. We know this has been made very clear to the Social assessors by several members of the community. It also goes on to state that it will likely displace lower income households which goes further to support our objection that mining is not a major part of the area because if it were, we wouldn't notice the injection of some people on mining wages.
4. Page xi lists some potential benefits of the project to the Blayney LGA, but we feel there's more negatives that hadn't been considered:
  - Increased crime;
  - Increased demand on law enforcement which is currently skeleton staff as is;
  - Increased segmentation in the community between the incoming workforce who are only there to use the area for its resources and leave, and locals;
  - Increased cost of living due to an increase in average disposable income;
  - Increase demand on local services requiring investment from Council that requires long term ongoing maintenance that will continue after the project (and the associated VPA) and ongoing costs will have to be borne by the existing and long term community;
  - Education facilities are operating at full capacity with no room in classrooms as it is. The Department of Education will not fund additional classrooms for a short term increase in population of 10 years;
  - Increase demand on local community groups that are already underfunded and understaffed.
5. The report speaks of historical mining and that it's always been in the area but the most recent mine in the area has been closed for over 20 years.

6. Page 25 para 2 Admits that Orange and Bathurst are likely to receive most of the workforce. Claims of the benefits of this project to the local Blayney community are grossly overstated given most of the workforce will not reside in Blayney.
7. Page 47, at 4.1 states that "many people who support the project may have felt uncomfortable declaring their views in a public forum due to the perceived pressure from or a desire not to offend individuals or groups who are strongly opposed to the project". This goes both ways with dozens of our members not attending meetings for fear of being the 'scare mongerers' and opposing the project that some people think are going to lead to them being millionaires. This is evident with local online activity showing that if anyone publishes anything that is anti the proposal, the same handful of people jump online and insult, abuse and demean the people publishing information that shows the negatives of the proposal.
8. The SIA lists just 4 raised potential benefits, and 6 potential negative impacts to the broader area. In the same assessment, it lists only negative impacts to those closer to the mine. Of the 4 benefits listed, it was noted that only a few residents were aware of the VPA process, and this speaks volume to the understanding and awareness of the residents with perceived benefits.
9. On Page 74, at 4.3.3, in an attempt to oppose the claims of locals that the Blayney LGA won't be the receiver of the financial benefits of the project, the report claims that the CSIRO claimed that a survey of 5,121 Australians showed that they believe most mining economic benefits are received by the mining community it operates. 1. People's perceptions and beliefs and not reality; 2. Blayney is not a mining community 3. The Central West is not a mining community with mining employment representing less than 10% of total employment across the whole area.
10. Page 53 states residents had spoken to other residents around Cadia Valley Operations and several are members, each with several scenarios of the Company not doing what they stated they would about breaches of conditions being treated lightly and the cost of the breach being less than the cost of not committing the breach. Additionally, and more importantly, residents distrust in the proposal and the mitigation measures and modelling is a result of the Regis representative's failing to consult effectively with the community. Each resident has their own story of how they've been either: lied to, dismissed, ignored, misrepresented or told contradicting stories by representatives of Regis throughout this entire process. It also goes on to explain that distrust remains over the TSF despite efforts of Regis to explain its safety and integrity. The doubt over the TSF also arises from the fact the TSF is on top of numerous natural springs, which cannot be 'modelled' accurately, an admission by the water modeller. Additionally, even if the modelling is 95% correct, the consequence of that 5% failure will be catastrophic to what is the only water resource for hundreds of residents in the area.
11. The mining sector in the Blayney LGA is simply the overflow of the Cadia Valley Operations. It's not a mine in Blayney; it just happens the project is of such a size it overflows into the Blayney LGA. The CVO is located closer to Orange than it is Blayney. This goes to state that Blayney does not import employees to cover the mining employment, the mining employment is in the Orange LGA.
12. The SIA mentions changes in the cohesiveness of the Kings Plains community and the Blayney LGA. This resulted from the lack of consultation from Regis and the increase in assumptions made by residents in Kings Plains and the Blayney LGA leading to rifts in expectations from the project. The proponent could have prevented this, and can still mend it, with clearer communication about the jobs that will be coming to Blayney. They choose not too.
13. The table on page 196 under support resident health and wellbeing claims that a HIA has been completed and communicated to the PAA. Being members of the PAA, we can confirm this has NOT occurred. When asked about this, Bronwyn answered that this would be completed in the next month. This further supports our claims of lies and misleading claims by the proponent.
14. After listing mental health concerns of locals and nearby residents, page 172 states "The primary strategy to manage resident stress and anxiety in relation to the project is for Regis to engage in and maintain transparent, evidenced -based and ongoing dialogue with concerned property owners based on the results of the EIS." From our points in this submission, surely you're able to realise that Regis does not, has not and will not engage in "transparent and ongoing dialogue". In fact, it was weeks into the exhibition period before they met with their first resident recommended to be covered by the VLAMP.



15. Page 172 of the SIA states that during the EIS, Regis will... "Offer to meet with the BHPG to discuss the EIS findings". We can again confirm that this has not occurred. Given we're submitting this on the last day of the exhibition period, this is yet another claim of proponent action that they did not carry out. This proponent, left to their own devices, will not consult with neighbours, will not work with the community, will not integrate with the community, and does not have the best interests of the community in mind.

### **Economic**

It's interesting that out of 6,336 pages of reports, only 86 pages are to support the benefit, that being of economic benefits to the world. The entire methodology behind the Economic impact appendix is a cheap, highly variable, estimation based method which is loaded with assumptions and assertions from the proponent. A computable general equilibrium (CGE) method would be far more appropriate, and justification from the proponent of assertions needs to be sought. The appendix even carries with it an admission that the methodology adopted shows the upper estimates of benefits (app DD, page 72). Attachment 5 of app DD at clause 4 confirms that the method adopted tends to overstate the benefits of final demand and stimulus.

Specific items we want addressed are:

- A detailed justification for the number of jobs. We understand the job numbers would change, especially during construction, but there's no reason you shouldn't be able to get close. You know how many admin staff you'll need, how many units of machinery and equipment you'll need and you have existing operations to help make accurate justifications for role requirements. The proponent is selling the prospect of hundred of jobs to the local economy, they should be able to detail what those jobs are.
- Page 32 at 4.5.1 of app DD claims that Regis is only 4% foreign owned, when the company published a chart in September 2019 to the ASX market stating that only 30% of its issued shares are to Australians. Can you clarify where the 4% ownership comes from as it appears that 70% of the profits of this project will go overseas?
- The project is claiming to debt finance 50% of the project costs. With initial costs estimated to be in excess of \$300M and only roughly \$100M in the bank, where is the rest of the initial funding coming from?
- The proponent claims in several areas throughout the EIS that backfilling the final void is financially unviable. We can't find anywhere that an actual costing estimate to complete the backfilling has been carried out. How do you know it's financially unviable? Wouldn't the cost of backfilling the void be part of rehabilitation in returning the site back to its original form, and therefore should it not have been included in the CBA?

### **Conclusion**

As can be seen from the above, the only way the proponent has justified mitigating all of these negative impacts, risks and costs, is by desktop modelling and assumptions based on their own assertions. The issue with this, and as proven in the above, the proponent has a history of lying, misleading and not following through on what they say they will do. It is no surprise that our members and the broader community have no trust or confidence that the proponent will carry out the mitigation exercises, consultation, policy creation and adherence or even boost the economy as they claim.

It appears the process for a proposal involves getting approval based on some promises and claims that things will be done without actually providing any details of these plans, how they will operate, what impacts they will have or how they will be held accountable to them. Instead, this is all left to after the approval of the proposal.

No where in the proposal does it accumulate the negative impacts to give a true understanding of what the total impact will be from this proposal. Case in point is that if you were to add up all of the below, and weigh it against the only benefit of potential short term increase in income, is this project truly of benefit:

- Loss of agricultural productivity;
- The impact of contaminants seeping into the water system, albeit modelled to be low amounts in best case scenarios;

- Reduced water flow to our vital waterways;
- Potentially contaminated water into our waterways;
- An increase in noise, albeit within regulated limits with the proponent doing their absolute best efforts;
- An increase in air pollution, albeit within regulated limits with the proponent doing their absolute best efforts;
- The removal of existing native vegetation, admittedly displacing known threatened and vulnerable species, albeit offset within regulated limits with the proponent doing their absolute best efforts;
- The removal of aquatic habitat and naturally created waterways;
- The increased traffic flows, noise and accidents that are associated with intersections on highways;
- The loss of visual amenity and changing landscapes;
- A change in community demographic, values and sense of friendship;
- A sense of belonging to the community;
- Increased health issues including physical and mental;
- Increased local displacement of residents due to an artificial and short term shift in the socio economic status;

All through the EIS, mitigation measures and efforts to work with neighbours are listed as 'as at the request of the resident'. Why is the proponent not forthcoming with offers of mitigation and assistance to help their near neighbours and community members adjust to life with a hole in the ground and toxic dust blowing over their properties?

All of the listed lies, omissions, contradictions and misstatements are just what we, a handful of individuals with no experience in EIS preparation, employed in other industries and working full time, and with families, were able to find in this proposal in just 40 days. This excludes the things that are said to our faces that either never happens or change the next day, or things that aren't said to us at all. This proponent is NOT a community member.

The nearest residence to Cadia Valley Operations (CVO) is 3kms from the mine boundary. CVO receives numerous complaints from residents about noise, dust and light emissions. Noise and dust complaints come from >10km away. Dust is a significant issue at present at Cadia resulting from the drying out of damaged tailings dams and a lack of water to suppress the dust. Newcrest's proposal stated its TSF was not going to fail. It did. Newcrest has a dust suppression plan for its entire operations, including the TSF. It's not working. Newcrest had a water management plan for their proposal. It failed. The Lake Cowal gold mine's closest residence is 6kms away from the mine boundary. The township of West Wyalong is 40kms from the mine. Blayney is 6kms from the tailings dam that will be a source of toxic dust from dry parts of the surface. There are residents within hundreds of metres of this proposal. It cannot go ahead.

Our final plea is for the DPIE to look beyond the desktop models that understate the true impacts to the existing and future water, heritage, ecological, agricultural and community impacts; and the overstated economic benefits of this proposal, and see it for what it really is – a short term effort to extract a small portion of unusable resource with the sole aim to generate profits to be paid to a small portion of the world's population.

Kind regards,  
Daniel Sutton



President  
Belubula Headwaters Protection Group