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NSW Department of Planning & Environment
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Dear Madam/Sir

Submission – Mount Owen Mine Continued Operations Project

I wish to make a submission in relation to the proposed Mt Owen Continued Operations Project currently on public exhibition.

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

Mt Owen has a commendable record in biodiversity monitoring and management. The long term monitoring undertaken to date is of regional and national scientific importance. It is essential that the existing fauna and flora monitoring, management and governance program be maintained until the end of the mine life, and in the rehabilitation period following closure.

Specific matters that must be addressed in any consent are:

1. The fauna and flora monitoring and management as outlined in the application documents are inadequate. The existing program must be maintained and properly documented, and appropriate requirements need to be included as part of the development consent.

2. The biodiversity offsets for the existing and continued project are inadequate to fully compensate for the biodiversity impacts of the additional clearing of 136.3 ha of endangered ecological communities. Opportunities should be considered to expand biodiversity offset areas and to secure their long term protection.
3. Consent for the project must provide public access to the results of ecological monitoring undertaken on the site, and ensure publication of results in scientific journals.
4. Flora and fauna management plans and practices must be subject to periodic peer review processes to ensure that best biodiversity management practice at the mine is being maintained.

Thank you for the opportunity to make a submission.

Yours sincerely



M Fallding
Principal, Land & Environment Planning

5 February 2015