



PO Box 261 Singleton
AUSTRALIA 2330
Phone
(02) 6571 1208
Email
lep@calli.com.au

NSW Department of Planning & Environment
GPO Box 39
SYDNEY 2001

Dear Madam/Sir

Submission – Mount Owen Mine Continued Operations Project

I wish to make a submission in relation to the modification application for the Mt Owen Continued Operations Project currently on public exhibition (SSD 5850 MOD 2).

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. Further modification of the mine to extend its area of impact by 46 ha, and the mine life by 6 years continues the progressive expansion of biodiversity loss with each modification and amended consent. Environmental assessments undertaken over the life of the mine have consistently underestimated adverse biodiversity impacts.

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

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

1. Options for avoiding biodiversity impacts have not been seriously considered. Relevant options need to be identified, and must form part of the environmental impact assessment.
2. Offset ratios used for calculating offsets are not adequate and should be higher, thereby providing greater biodiversity offset areas. In particular, the offsetting proposed appears significantly less than would have been required under the former Biobanking Assessment Methodology. Furthermore, biodiversity credits should not be given to rehabilitation at the minesite for losses attributable to the mining operation.
3. The security of offset areas associated with the mine has not been guaranteed. This should be an essential requirement of any approval. This can only be achieved by establishing offset areas as stewardship sites under the *Biodiversity Conservation Act 2016*.
4. The assessment fails to mention of climate change as a risk for successful implementation of biodiversity impact measures, recognising that carbon emissions from the mine operation and production are a significant contributor to climate change.
5. Ongoing biodiversity monitoring at the site must continue for the full mine life and at least 10 years beyond. The long term monitoring undertaken to date is of regional and national scientific importance. It is essential that the existing fauna and flora monitoring, management and governance program be maintained until the end of the mine life, and in the rehabilitation period following closure.
6. The fauna and flora monitoring and management as outlined in the application documents are inadequate. The existing program must at least be maintained and properly documented, and appropriate requirements for this need to be included as part of the development consent.
7. Consent conditions 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.
8. 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.
9. The proposed extension contributes to an increase in the size of the final void following mining. Any remaining void is unacceptable, and measures must be taken to amend mine planning to reduce the long term disturbance footprint, noting that the progressive rehabilitation of disturbed areas at Mt Owen Mine is unacceptably slow.

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

Thank you for the opportunity to make a submission.

Yours sincerely

M Fallding
Principal, Land & Environment Planning

25 August 2018