

Friday 19 February 2021

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**OBJECTION AND SUBMISSION to CADIA VALLEY OPERATIONS MOD 14 –  
INCREASED PROCESSING RATE**

**Application number - MP06 0295-Mod-14**

WE OBJECT unequivocally to Cadia Valley Operations (CVO) – Newcrest Modification 14 – increased processing rate.

While we live at 3km's East of Mandurama, we see the impact the mine, particularly it's dust has on the residents and landscape surrounding the mine when visiting family or simply driving into Orange. Having grown up at Burnt Yards/Errowanbang and our family settled there for 99 years it is alarming to know that this MOD 14- Increased Processing Rate Application Exhibition date was not sufficiently conveyed to the residents of the area and if they had not been made aware by external sources then would never have known about it. What else is CVO not telling the community?

Below is a specific list of objections to this major project.

1. Notification & Consultation – CVO and DPIE.
2. Dust Issues
3. Air Quality
4. Proposal to lift the NTSF wall by 40m
5. Water Resources
6. Intergenerational Concerns

**1. Notification & Consultation**

We did receive an email pertaining to the Modification 14 Public Notice dated December 18 from Lindsey Tilburg– however no date at the time had been set for the Exhibition Period. When the exhibition period was announced to CVO on Jan 11, this date was not conveyed to landholders or those on their email list, such as ourselves who are not even directly in line of site of the mine.

## 2. Dust Issues & Breaches.

We agree and adopt generally John Gerathy's comments from his submission on Dust from the NTSF and STSF surfaces at Cadia.

*'Complaints by Cadia Residents to the EPA, record, with photographs and videos supplied, serious dust events since mid 2018 emanating from the NTSF and STSF surfaces which events have not ceased despite attempts by Cadia with aerial and panther spraying/ mulching of both dams! Refer to the scheduled correspondence referred to above in particularly in relation to dust from the NTSF and STSF.'*

*Cadia failed for nearly two years, after the March 2018 NTSF slump ( bankment collapse) to apply sufficient works or funds to control this dust. Following constant complaint and pressure from Cadia Residents Cadia in April 2020 started to apply proper resources to try and control silica dust emissions from the NTSF and STSF and report monthly to Residents.*

*Despite Cadia's efforts as described at great length in these monthly reports dust is still regularly blanketing the community and Cadia continually treats major dust events just as a matter of recording. The gravity of their breaches is sought to be lost in their reports' works details.' John Gerathy Submission dated 18.02.2021*

Driving the Errowanbang/Cadia road to Orange we have seen directly the evidence of dust coming straight off the tailings dam and engulfing the valley.

We agree and adopt generally Stuart and Gemma Green's comments and photo evidence in their submission on Dust Issues.

### **26 April 2020**

*This dust event is by far the worst to date and spewed dust off 600ha like a giant gently boiling cauldron that was cascading a fog due east, south east, south and at times to the north. We never wish to experience this level of dust and particulate matter again. It was truly a horrendous day. This event **occurred 25 months after the dam wall collapse.** We make no apology for the volume of photos shared here. It is incredibly important that we are heard at this level – the visual evidence here is highly damning and equated to our knowledge, in a fine by the EPA to the value of \$15,000 – this is utterly nonsensical and offensive to those who have been proactive in their community efforts to call CVO & the EPA to action! This PIN was issued by the EPA on 31 July for 3 events dated from 5 March 2020.*



*Dust blowing for hours over pristine basalt grazing landscapes*



26 January 2021



## SUBMISSION

**We request the DPI&E in assessing this Mod 14 Application call for and consider all records of the EPA and Cadia/Newcrest dealing with dust complaints since March 2018.**

### 3. Air Quality

We strongly agree and adopt generally Mike & Frances Retallick's concerns after their significant research on air quality and particulate matter within landscapes surrounding CVO as quoted below.

*'For several years there has been a high level of community concern in regard to the long-term risks to health resulting from the air borne pollution generated by CVO activities.'*

*The currently identified ore reserve is 2900 dry tonnes, at a production rate of 32 Mtpa the life of the mine is in excess of 80 years. Therefore, many resident's exposure to dust will be lifelong, there will be a measurable impact upon their morbidity, particularly for vulnerable age groups such as infants and the elderly.*

*CVO's current air quality criteria (Appendix F Table 3-1) is determined in effect by PA 06-0295 and is based upon air quality standards in place at the time of the original approval 30 years ago. These standards did not consider fine particles which are more dangerous and travel further. This air quality standard is now obsolete and less onerous than standards expected by the World Health Organisation*

*and the current NSW EPA impact assessment criteria. The current NSW EPA Impact Assessment Criteria are discussed in Appendix F Table 3.3.*

*CVO barely complies with the current air quality standards and definitely will not comply, even at the current production rate, with the planned 2025 NSW EPA requirements of PM<sub>2.5</sub> annualised at 7 µg/m<sup>3</sup> and over 24 hours at 20 µg/m<sup>3</sup>.*

## **SUBMISSION**

- a) That Cadia's Air Quality Criteria must be updated to reflect the current EPA guidelines and continue to do so for the life of the mine.**
- b) Cadia's production be restricted so that it ensures there is compliance with prescribed air quality standards and**
- c) Given Cadia's current dust events are in breach of SSDA Condition 17 there be no approval of the increase in annual ore processing rate.**

### **4. Proposal to lift the NTSF wall by 40m**

Our understanding is the proposed extension of the embankment on the NTSF is not needed nor required for the currently approved life of the mine to 31 July 2031. We seek clarification as to the actual steepness of the bank on the NTSF wall, there are conflicting ranges as reported in your Cadia Newsletters ranging from 3:1 to 2.5:1 to 2:1, which is the correct figure?

The proposed increase in the height of the dam wall by 40-44 metres on top of what can only be described as a catastrophic slump of approx. 215m long causes us great concern. How can you expect to build this additional 40-44 metres on unstable footings? Safety is a main concern here for individuals as well as the environment in the event of potential slumps and how this may impact the river systems of the Belubula, Lachlan and Darling. At what point does the Environment come first?

Over the past 15 years with Modification changes and allowances the NTSF and STSF have become a dominant eyesore in the valley and area, particularly when travelling down the Errowanbang road and past the tailing dams.

## **SUBMISSION**

- a) That final approval not be given to uplift the NTSF embankment by 40m**
- b) That approval not be given to uplift the NTSF embankment unless and until Cadia has applied for and had approved an SSDA Application to extend the ore output and life of the mine.**

## 5. Water Resources

Water is a precious resource worldwide, especially those in sectors where it is utilised within business. The requested 10% water increase, in line with the increase of processing from 32 to 35 Mtpa, 176ML/day or 60,000,000L/day of water is difficult to fathom. Where does CVO propose to source this addition water from? And at what cost to the Environment?

We adopt and agree generally to Mike & Frances Retallick's summation in their submission.

*'The proposed modification to 35Mtpa increases the water requirements for the CVO site. It is envisaged that this requirement will be met by efficiencies of the PTSF.'*

*Commissioning of the NTSF and STSF will put more demands on the amount of water required due to evaporation and seepage / leakage. The last few years have been marked by water shortages for all members of the community. Shortage of water is currently a major constraint in development of further ore reserves in our region, (proposed McPhillamys mine near Blayney). In the interests of the environment and broader community a fair and sustainable level of water sharing needs to be established. We believe that this level is probably that required for 30 Mtpa (ie less than the current approved rate of production). The purpose of setting production levels is to ensure that the business operates within sustainable and responsible parameters, rather than limited resources being stretched to meet a random short term economic goal driven by executive compensation and short-term shareholder returns.*

*Purchasing Belubula River water entitlements downstream and extracting upstream has negative effects on the health of the river in our district.'*

How will increasing the water requirement potentially effect aquifers and water tables throughout the Orange, Panuara, Errowanbang and surrounding village areas?

An equally concerning matter is the fact that Regis Resources are hoping to build a tailings dam on top of 12 springs that make up the headwaters of the Belubula River that in turn flows down into the Murray – Darling Basin.

### SUBMISSION

- a) **Any Mod 14 Approval (which is objected to) requires CVO to supply water reports from all sources and the report is to be compiled by an independent certifier and reported monthly to residents.**
- b) **Cadia's operations and tailings dam's pollution of both the surface streams and aquifers must cease before any further approvals by DPI&E can be made.**

## Summation

We adopt and agree generally to Gemma Green's summation below in their submission.

***“Sustainable mining means engaging and respecting local communities, assessing and managing safety social and environmental impacts, and making ethical and transparent strategic business decisions. This approach delivers safe and profitable operations.”***

**NEWCREST MANAGING DIRECTOR AND CEO - SANDEEP BISWAS**

Source <https://www.newcrest.com/sustainability/our-sustainability-vision>

Newcrest further states;

### **OUR STAKEHOLDERS**

- *Newcrest's broad range of stakeholders reflects the diversity of our operations, activities and industry.*
- *Our aim is to involve our stakeholders in decisions that affect them and to understand their point of view.*
- *To achieve this, we build and maintain open, inclusive and constructive relationships with all stakeholders through listening, respectful dialogue and integrating diverse perspectives into pragmatic solutions.*
- *Our engagement methods are tailored to suit stakeholder needs – we use both formal and informal processes, depending on the relationship and communication context.*
- *We work closely with our employees and contractors, local communities, governments and regulators, shareholders (investors and lenders), suppliers and customers.*
- *We also engage with the broader mining industry through industry groups, as well as non-government organisations, education and research bodies, the media and the public. We record, measure and review our engagement on a regular basis to ensure it is effective. Below are topics of interest raised by each stakeholder group and the engagement methods we use.*

Source <https://www.newcrest.com/sustainability/our-sustainability-vision>

(Highlighted points mine)

*We call into question the highlighted areas of the above statement by Newcrest. Following the slump on the STSF in March 2018, many other aspects of community engagement have 'slumped' too. The reactive nature of engagement with the community is ongoing and evident. Examples are; the Tailings Dust Management Report which began in April 2020 as a monthly report – PROACTIVELY initiated and requested by Community Members. The reactive nature of communication from CVO is consistent. At a community landholder meeting at John & Hilde Gerathy's – 'Errowanbang', November 2019 with the then GM Peter Sharpe and other CVO Staff, it was unanimously requested for clearer, consistent and proactive communication specifically around tailings dam dust and many other issues and concerns. These are just two examples of reactive communication from a corporate neighbour.*

Thank you for receiving our fervent objections and considering our submission.

We declare I have not made any financial or other contributions to any political party in the past two years.

Dated 19 February 2021  
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