

McPhillamys Gold Project

EPBC ID Number 2019/8421

Application Number SSD-9505

1. These submissions and comments are made on behalf of the Neville and Region Landcare Group Ltd (**NRLC**) in relation to the McPhillamys Gold Project (**Mine**).
2. These submissions and comments are made in response to the documents in relation to the project, currently on exhibition through the NSW Planning Portal.

Impact on water table/underground springs

3. The NRLC has been involved in the regeneration of swamps, springs and waterways in the region.
4. The Belubula River is supplied by both surface water and underground springs. The Blayney water supply, Lake Rolands, is also supplied from underground springs, from the surrounding area.
5. The tailings storage facility (**TFS**) will be built over the top of the springs which feed the head waters of the Belubula River, and the Mine pit will be dug approximately 470m into the ground, which will have an impact on the underground water table via infill.
6. There is little mapping, survey or information of any kind in relation to how the water table and underground springs in the broader region are interconnected, and how the planned mining operations, the TFS and pit void will potentially affect the underground springs in relation to, the following;
 - a. potential impacts if the water table is breached, as occurred at Browns Creek Mine near Blayney resulting in the water table dropping (this caused the bores of surrounding landholders to run dry – the mining company was fined in relation to that). Regis claims McPhillamys is a different rock structure, however the breach at Browns Creek occurred from blasting, not a rock structure failure;

- b. the potential for contamination of the underground water table from mining operations and in particular the TFS, as it is to be built on top of the River. Regis has claimed it will seal the springs on which the TFS sits with a layer of clay. However, this seal must remain stable for in perpetuity, and given there is not a TFS in the central west that has not leaked or breached, this provides little assurance;
 - c. potential impacts of the water flow and quality on bore water in the immediate vicinity as well as the broader region.
7. It must be noted that particularly in this era of climate change and an increasingly variable climate, landholders rely heavily during drought on these underground springs for their dams and bores, as well as the Belubula River which has not run dry even during this current drought.
8. The protection of the Belubula River and the surrounding springs should be considered of paramount importance, because once they are contaminated such damage will be difficult, expensive, if not impossible to undo.

Native Vegetation and wildlife – Terrestrial biodiversity

9. The NRLC has been involved in planting and facilitating a koala and native wildlife tree corridors between Kanangra Boyd to Wyangala (**K2W Project**). It is part of a broader Great Eastern Ranges Initiative. These corridors also provide habitat for other native species.
10. Furthermore, NRLC has an increasing focus on increasing the uptake by local farmers of regenerative agriculture. Such practices are increasingly being recognised as increasing the productivity of farmland, as well as providing important habitat for native species.¹
11. It has been well documented that koala numbers are in decline primarily due to habitat destruction.

¹ Charles Massy, *Call of the Reed Warbler: A new agriculture, a new earth* (2017) University of Queensland Press.

12. Due to past agricultural practices, there are very few established stands of native vegetation large enough to support native fauna habitat in the area.
13. Regis has identified the mine will require the removal of 132.36 hectares of established native vegetation, in particular Gum Woodland, which provides habitat for koalas and other native species.
14. It is presumed any kola or other native species population that is dependant upon this area will be negatively impacted. Regis has not adequately addressed such impacts.
15. Regis has failed to identify what will happen to these native fauna populations that are already vulnerable.
16. Regis has stated a biodiversity stewardship site may potentially meet part of its offset obligations.
17. Its noted this site is over 10km away from the site on the other side of the township of Blayney, therefore it is unlikely existing native fauna populations would relocate.
18. It is also noted Regis has planted 4,400 trees in a tree corridor, however it will take 15-20 years for these to mature to a stage where they can support native fauna populations
19. The removal of 132 hectares of established native vegetation fails to negate the very real and actual impact this will have on existing native fauna populations dependant on this stand in an already heavily cleared area
20. Such a significant stand of native habitat in a region so heavily cleared is arguably of greater significance and should be protected rather than offset as proposed by Regis.
21. Furthermore, Regis has proposed it will potentially open satellite pits throughout the region.

22. In particular concern to NRLC, Regis has failed to identify and address the impact of mining operations at the Discovery Ridge Prospect on the Neville-Mandurama Road. It is noted that the Shaw Road between Neville and Blayney is a potential proposed route for ore to be transported to the Mine for processing. This road is adjacent to the tree corridor where kolas have been sighted, who may potentially be at risk of becoming road kill due to increased heavy traffic.
23. It must also be noted that it is incredibly disappointing to NRLC who endeavour to reforest and re-vegetate our area that has been highly cleared from past agricultural practices, to now be confronted with a project that will remove at least 132.36 hectares of mature Gum Woodland. Such trees take decades to mature and are not easily replaced.

Satellite pits/mines

24. Regis has failed to identify and address the impacts on the local communities such as Neville, Mandurama and Lyndhurst, from potential satellite pits such as Discovery Ridge Prospect on the Neville-Mandurama Road.
25. Regis has stated that such satellite pits will not require state government approval as they will be below the significant/major project threshold.
26. Regis proposes to transport ore from such satellite pits to the Mine for processing. This potentially increases the mine life exponentially, beyond that which is currently under consideration.
27. The potential impacts include, but are not limited to, the impact on local villages from noise, dust, light pollution, increased heavy traffic and environmental impacts.

Intergenerational impacts

28. It must be noted the residue of the TFS and the Mine void will remain for generations after the Mine is closed.

29. The ongoing impacts of closed mining operations, particularly in relation to contamination, are well documented throughout Australia. It then becomes the responsibility of state governments to fund the cost of cleaning up of such contamination.
30. As the TFS is to be built on the springs which feed the Belubula River, and the residue of the TFS will remain in situ in perpetuity, Regis has failed to adequately identify and address who will be responsible for any potential contamination of the surrounding land, springs, and Belubula River, in years or generations to come after Mine closure.
31. It must be noted that Blayney and the surrounding area will live with the residue of this Mine for generations to come. Due to the proximity of the Mine to Blayney and in light of the TFS being upstream from the town, these considerations should be given greater weight over the alleged short term economic advantages proposed by Regis.
32. The surrounding Mine area is not sparsely populated. The impact on future generations has not been adequately addressed, given the proximity of the Mine to the township of Blayney.

Climate Change

33. It is noted that researches have now positively identified the impact reforestation has on the fight against climate change.²
34. In particular Australia ranked forth on the list as having land available for potential tree restoration. However, reforestation efforts in Australia are being undermined by land clearing.³
35. Regis has stated its greenhouse gas emissions will be minimal making only minor contributions to total emissions.

² Robin Chazdon and Pedro Brancalion, 'Restoring forests as a means to many ends', *Science*, (05 July 2019) Vol 365, Issue 6448, pp 24-25.

³ Nick Kilvert, 'Climate change could be paused by planting trees, researchers say, as they map out available land', ABC, (5 July 2019) <<https://www.abc.net.au/news/science/2019-07-05/climate-change-tree-planting-carbon-dioxide/11267556>>.

36. However, this fails to take into account the impact of clearing 132 hectares of established Gum Woodland, and the inability to reforest the areas of the TFS and the Mine void and infrastructure areas.

Affects on communities downstream

- 37. Regis has failed to identify and address the potential impacts from its Mine operations on communities that live downstream on the Belubula River, for example Canowindra, particularly if the TFS overflows, which may potentially occur during a high rain fall event as occurred in 2016, or if the TFS fails as occurred last year at Newcrest Cadia Valley Operations.
- 38. Farming downstream is dependent on the Belubula River for irrigation for crops, especially lucerne. The irrigation enables continuing lucerne production even in times of drought, which is essential for fodder production and supply to drought affected farmers.
- 39. Short-term mining interests should not be given greater weight against the long-term necessity for a clean and stable water supply.

Agriculture

- 40. It must be noted the proposed Mine will be on top of prime agricultural land.
- 41. Once mining operations cease, a significant portion of Mine will not be suitable for agriculture, in particular the TFS and Mine void and infrastructure areas (approximately 800-1000 acres).
- 42. These prime agricultural land areas will be damaged forever, in order to extract 10 years worth of gold from the ground.
- 43. It is also noted that during this current drought, our area has been able to continue to produce agricultural products. The Belubula River has continued to flow. The rainfall we have received has left our small region green and productive.

44. The agricultural areas that will be damaged by the Mine are of particular significance during periods of drought. This is evident when the areas are compared to surrounding regions of NSW are struggling due to drought.
45. It is also noted that 800-1000 acres in this region is a significant amount of productive farmland.
46. In light of the increasing variability of our climate and the importance of food and water security, preserving prime agricultural land should be of paramount importance, particularly over the short term gains offered by Regis.
47. Regis has failed to adequately address or justify why the importance of long-term farming is outweighed against short-term (10 years) mining interests.

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