centralwest environment council 870 Ophir Road, Summer Hill Creek, 2800.

Planning Services,

Department of Planning, Industry and Environment

GPO Box 39, Sydney NSW 2001.

Mcphillamys Gold Project Ssd-9505

OBJECTION

The Central West Environment Council (CWEC) is a regional environment group linking district environment groups in Orange, Bathurst, Blayney, Lithgow, Mudgee, Rylstone and Dubbo. CWEC's goal is to conserve the environment of the Central West for future generations.

CWEC is objecting to the proposal for several reasons: impacts on water quality and quantity; loss of habitat for vulnerable species; and effect on the local residents. There is also the loss of 23 cultural heritage sites of ‘moderate' significance to the local Aboriginal community.

IMPACTS ON WATER QUALITY

The mine does not have its own source of local water. The water planned to be brought from Lithgow via pipeline is mine discharge wastewater, highly saline and likely to be containing other toxic elements. If the water was good quality, it would not be being diverted from the Cox's River/Sydney basin.

The claim that the proposed pipeline will benefit the community after the mine closure could be misleading if the water quality is this poor.

There is also a major concern that toxic residues will reach the Belubula River and eventually the Lachlan. As the tailings dam is proposed to be right on top of the river, any contamination will not have far to travel. Furthermore the primary water management facility (WMF) is only 150 m from the river and will receive less scrutiny than the tailings dam, e.g. may not be as securely lined if at all, so there is a high risk of contamination.

Contaminated saline water is likely to have an adverse effect on aquatic and riparian flora and fauna species and this has not been adequately addressed by the EIS. Nor has the potential for salinity to increase in the already salt-laden Murray Darling Basin.

The remaining open-cut void could remain a source of pollution and possible fauna deaths for centuries. It is estimated that it will take > 400 years before groundwater (possibly contaminated) will cease seeping into the void.

Other concerns include the possibility of arsenic and cyanide contamination, leading to fish and other animal kills, during abnormal heavy rainfall events.

WATER QUANTITY

There are two major issues here. Loss of flow in the Bebubula (and consequent effect on downstream users and, eventually, the Lachlan and Murray-Darling Basin) and reduction of groundwater.

It would seem that there were no flow data collected for this EIS, which seems to be a serious omission. Modelling has its place, but baseline data are essential prior to a development such as this. Insufficient attention has been given to the threat of a drying climate and the severity of the current drought, with impacts on water sharing arrangements and threats to basic rights, stock and domestic users and to town water supply.

The nearby Cadia goldmine has experienced severe water shortages. It is not responsible to approve another high water-dependent gold mine in the headwaters of Lachlan water source.

In respect of the streamflow reduction of 4–9% as stated in the EIS, this could have effects on the aquatic ecosystems in a system that is admittedly already under stress. In dry times, this could result in no flow. Although, habitat assessment was undertaken to assess riparian condition, there was no systematic survey of aquatic or riparian flora or fauna, which is a grave omission. Platypus is known from this river according to the locals, but is not mentioned, nor the macro-invertebrates on which they feed. And some areas were identified as being of Type 1 highly sensitive key fish habitat. It is not considered acceptable to destroy areas as sensitive as this. And one could argue that, simply because a river system is already stressed, there is no reason to stress it further.

The recommendations relating to the aquatic ecology are good, but not mandatory, so not particularly useful.

HABITAT LOSS AND EFFECT ON BIODIVERSITY

While the area is primarily grazing country, there are some notable areas of woodland (132.36 ha) that will be destroyed, including

- 129.3 ha squirrel glider habitat (‘vulnerable' under BC Act)_
- 77.57 ha koala habitat (‘vulnerable' under BC and EPBC Act). I koala observed
- 44.22 ha white box yellow box blakely's red gum EEC (BC Act) (a 3.9% reduction within 5 km) and
- 18.5 ha white box yellow box blakely's red gum and derived native grasslands CEEC (EPBC Act 1999) (a 1.68 % reduction).

CWEC does not consider that this loss of biodiversity in an already highly cleared landscape to be acceptable. In particular the destruction of the koala foraging habitat could have a really serious effect on this species. As an ecologist living in the area since 1991, I can confirm that sightings of squirrel glides and koala are very uncommon in this region. The EIS argues that the scarcity of these species makes the habitat less than optimum, so not worthy of conservation. Conversely, the fact that these species are present indicates that the habitat must be at least suitable and so should be protected to prevent further regional declines.

Whilst we acknowledge that purchase of an offset area south of Blayney is a good step, little information is provided in respect of the habitat quality of this area. Looking at the air photos, there is little connectivity between it and the other remnant woodland in the region.

There is a known koala corridor running north-south between Orange and Bathurst. The populations are small and vulnerable, but viable. The proposed offset is unlikely to provide a suitable alternative habitat for koala due to its distance from the existing foraging habitat and that corridor, not to mention the obstacles of crossing the township of Blayney and the mine site itself.

Further, Regis has not committed itself to an offset strategy, so it is hard to actually comment on the proposal. Calculation of offset credits has been undertaken, but there needs to be much more information on the proposed offset (stewardship) area. Is it already covered by other exploration licences? Why are there no plans for further rehabilitation for the grazing portions of the offset area?

There are some other anomalies and concerns with the biodiversity. The EIS states the Superb Parrot was recorded in the Project Area, and later that it was recorded just south of the area. In either case, the habitat would be favourable for this species, which is listed as vulnerable both at state and federal level. In addition, little consideration had been given to other fauna groups such as arboreal and small terrestrial mammals.

More information is needed on the flora. For example, a photo of a large area of ‘wet tussock grassland' (photo 4.4) is shown and appears to be in reasonable condition with native species, but is described as poor. A better explanation of these types of anomalies is required as some of these landscape features could be swampy meadows of high conservation status.

And finally, there is a paucity of information on the abundance of hollow-bearing trees, known to a critical factor when assessing habitat for its conservation value. Clearly there would be many hollows removed, so this aspect needs attention.

IMPACT ON RESIDENTS

Having attended several meetings of concerned residents, I do not doubt that you will be receiving many submissions regarding the appalling impact this proposal will have on local residents in this quiet rural community, particularly those of King's Plain, so I will be brief.

CWEC finds it unacceptable that the residents will be impacted by the following:

- noise at above-acceptable limits
- dust, air and light pollution affecting residents, their rainwater and their domestic stock
- loss of water surface flow and ground-water for their farms
- loss of land value and difficulty of selling.

CONCLUSION

This project will provide a few jobs and some boost for the local economy. But the region needs businesses that do not require such massive volumes of water and that cause such disruption to the local community and its environment, particularly to koala habitat and the headwaters of the Belubula River.

Cilla Kinross

President, Central West Environment Council

18/10/2019