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20.10.2019

TO Department of Planning, Industry and Environment

### **Submission of Objection to McPhillamys Gold Project Ssd-9505**

**Mudgee District Environment Group is objecting to the proposal for several reasons:**

1. Impacts on water quality and quantity
2. Loss of habitat for vulnerable species
3. Social impacts on the local residents.
4. The loss of 23 cultural heritage sites of 'moderate' significance to the local Aboriginal community.

### **WATER QUALITY CONCERNS**

**The Proposed Pipeline** bringing water from Lithgow is mine discharge wastewater; this would be highly saline and likely to be containing other toxic elements as well. The claim that the proposed pipeline will benefit the community after the mine closure is misleading as the water quality is poor. If the water was good quality, it would not be being diverted from the Cox's River/Sydney basin.

**The Belubula River** will be at risk. Toxic residues could reach the River. The tailings dam is proposed to be right on top of the river. The primary water management facility (WMF) is only 150 m from the river and will receive less scrutiny than the tailings dam, both pose a high risk of contamination to the river. 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-laded Murray Darling Basin. The remaining open-cut void could remain a source of pollution and possible fauna deaths for centuries. Other concerns include the possibility of arsenic and cyanide contamination, leading to fish and other animal kills, during abnormal heavy rainfall events.

### **WATER QUANTITY CONCERNS**

**Lack of Base Flow Data:** It would seem that there were no flow data collected for this EIS, which seems to be a serious omission. Modeling has its place, but baseline data are essential prior to a development such as this.

**The Loss of Flow to the Bebusula River** (and consequent effect on downstream users and, eventually, the Lachlan and Murray-Darling Basin) and reduction of groundwater is a major concern. In respect of the stream flow reduction of 49% 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. 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.

## **HABITAT LOSS AND EFFECT ON BIODIVERSITY**

MDEG considers increased loss of biodiversity in an already highly cleared landscape to be unacceptable.

The EIS does not adequately identify the local Flora and Fauna impacts on squirrel glider habitat, koala habitat, white box yellow box Blakely's red gum and white box yellow box Blakely's red gum and derived native grasslands.

The offset strategy is poorly defined and will not assist in the conservation of the flora and fauna of the area.

## **IMPACTS ON RESIDENTS**

This project will have a devastating impact on local residents in this quiet rural community, particularly those of King's Plain.

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

- over-acceptable limits of noise
- 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
- visual impacts
- Destruction of the rural way of life and the inevitable decline of the village.

## **CONCLUSION**

The loss of water and risk to the headwaters of the Belubula River; the loss of remaining natural environment, particularly to koala habitat and disruption to the local community are not out weighed by the few jobs and possible boost to the local economy. Mudgee District Environment Group is asking that the Planning Department does not approve this destructive project.

Yours Sincerely



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