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Millamolong
Millamolong Road
Mandurama
NSW 2792
23 October 2019

Name of Application: McPhillamys Gold Mine Project

Application Number: SSD – 9505

We **OBJECT** to the proposal

Reasons for OBJECTION

We consider the EIS to be false and misleading due to the following omissions:

- *Discovery Ridge* The EIS includes some information relating to Discovery Ridge (Appendix D Tailings Storage Definitive Feasibility Study) but does not take Discovery Ridge into consideration in terms of McPhillamys mine site life, size of tailings storage facility, amount of saline water to be pumped to the site etc. Regis clearly intends to develop Discovery Ridge but has excluded it from this proposal thereby avoiding scrutiny of the regulators and residents of the true impacts of the McPhillamys Project upon the local community.
It is impossible to form a balanced opinion on the project without this information
- *Naturally Occurring Asbestos* Report from NSW Government Heads of Asbestos Coordination Authorities (HACA) clearly identifies the proposed mine site as being high risk.
Regis has been notified on numerous occasions by local residents that the asbestos needs to be taken into consideration. Appendix C – Social Impact Assessment refers to resident concerns about asbestos when you look at the cross referenced document, Appendix M, there is no mention of asbestos. It is misleading to claim a risk assessment has been completed if the mine management has ignored the risk of asbestos.
- *Junction Reefs* The EIS mentions other mines in the district (Cadia, Browns Creek) but appears to be unaware of the problems at Junction Reefs. Regis management has repeatedly been told that the experience at Junction Reefs needs to be taken into consideration – the geology of the deposit at Junction Reefs is most similar to McPhillamys. Junction Reefs is leaking AMD and other contaminants directly into the Belubula and will do so forever, we believe Browns Creek (abandoned mine is also leaking into the Belubula as indicated by water tests we took as the river flowed into Junction Reefs). Every tailings dam in the Blayney Shire has failed and is currently leaking into the Belubula or groundwater adjacent to the river.

We are currently relying upon dilution to improve the water quality. Yet we have been told by the Department of Mines that "dilution is not a solution to pollution."

- *Length of the EIS* The EIS has been intentionally written and designed to obfuscate and intimidate the lay reader. We have an extremely short timeframe in which to read the document, a small handful of locals were given access to hard copy documents - to suggest the average person could navigate and read this document from a USB and respond to it within a month is ludicrous.
The EIS is full of mistakes not the least of which is the fact the index is incorrect. How are we supposed to find information if the index doesn't cross reference? Why would we be confident in the ability of Regis Management to take due care if they can't even proof read an index for a document which is critical to their development?
Presumably the Discovery Ridge information was included by mistake?
We should be able to read the Executive Summary and achieve a balanced view of the proposal- however there are so many omissions and misrepresentations it is necessary to spend a great deal of time coming to grips with the proposal. By way of example the discussion of Aboriginal Heritage in the Executive Summary refers only to "low" grade heritage sites and completely omits reference to the letter from Annette Steel of Orange Local Aboriginal Land Council (page 156) which clearly states their opinion is that they regard the river as the source of life and would never contemplate the proposed development.
This letter is particularly important as it reflects the opinion of many people in the Shire and broader district.

2. ENVIRONMENTAL IMPACT – GROUND WATER

Our property, Millamolong, has approximately 10km of the Belubula as our boundary. We are direct neighbours with Cadia and Junction Reefs and are a member of the Junction Reefs Reserve Trust.

We have taken water samples at Bakers Shaft as the Belubula enters Junction Reefs and as it leaves and flows onto our property.

We have met with the EPA and it is recognised that the river is affected by AMD from the failed Browns Creek mine and Junction Reefs particularly arsenic and cyanide. This AMD will continue to seep out of the tailings dam indefinitely. The main tailings dam at Junction Reefs has been built on top of a spring (similar to McPhillamys) and despite costly interventions and the worst drought ever, AMD continues to seep out of the dam. Tailings have also been deposited in the open cut pit which is in close proximity to the river and are a source of contamination seeping underground into the river. We can see that management of this problem is going to be required permanently, this is an intractable problem in regard to the ongoing contamination.

McPhillamys proposal to build a tailings dam at the headwaters of the Belubula is of enormous concern and should never have been considered on moral, ethical and practical grounds.

Every tailings dam in the Blayney shire is leaking either into the ground water or directly into the river.

We are currently relying upon water flows from Carcoar dam to dilute the AMD, a proposal which reduces the flows and adds further contamination could be catastrophic.

The McPhillamys proposal must be considered in the context of the ecology of the total river system.

3. ENVIRONMENTAL IMPACT – LITHGOW PIPE WATER

Over a 10year mine life it is proposed that 51,000 ML of saline water be pumped from Lithgow. There is no chemical analysis of this water in the EIS. We note that the Orange Local Aboriginal Land Council has asked for this information and has raised concerns about the water. *(EIS is misleading in excluding this information).*

It is apparently intended that this water be used partly as a dust suppressant, that is it will be sprayed over the ground, which means the salt will build up and when it rains be washed into the river.

The remediation plan assumes that the pipeline will be left in place after mine closure. There is no plan to maintain it.

It is not acceptable to pollute the Belubula river with huge quantities of salt .

The remediation plan must include removal of the pipeline.

4. ENVIRONMENTAL IMPACT - AIR

We live approximately 9 kms from Cadia and can see on many days the problems Newcrest has in managing the dust. The EIS for Cadia recognised that the tailings dam would be a major source of dust. The EIS for McPhillamys , Table 11.9, doesn't include dust from the tailings dam.

Tailings dust is generated from beach areas and subsequently during remediation.

It is recognised by the EPA that the most dangerous dust is the small particles, PM_{2.5}, PM_{1.0} and diesel particulates. From our reading of the EIS it appears that Regis is planning to only measure PM₁₀. The proposal does not appear to have taken into account the dangers associated with small particulate silica, naturally occurring asbestos, arsenic and diesel. Particulates. Local residents (including children and the elderly) are particularly vulnerable to continuous exposures even at low levels.

Published data by the Australian Institute of Occupational Hygienists have identified that the risk of chronic obstructive pulmonary disease and the risk of a range of cancers is far greater for gold miners than even coal miners.

It is completely unreasonable to suggest that a mine of this scale can be built in such close proximity to a town the size of Blayney without significant impact upon mortality rates from cancers and pulmonary disease.

The health and potential mortality rate of local residents must take priority over a small gold mine.

5. TAILINGS DAM

We have the following concerns with the tailings dam:

- Proposal to seal off the springs and build the dam on top. In practice water will find its own outlet, it should be assumed that new springs will appear and will continue to flow under the dam (eg Cadia and Junction Reefs), the resulting water will be contaminated by the tailings.
- The dam is too close to the river – there is insufficient room to intervene and capture contaminated seepage (Junction Reefs experience)
- Projected minimum factor of safety of 1.3 is not in accordance with ANCOLD Guidelines Rev 1 July 2019, Table 8. Required factor of safety is 1.5.
- It is not apparent there has been a rigorous probability of failure analysis.
- The tailings dam does not appear to comply with Section 9 – Sustainable Closure Guidelines as specified by ANCOLD.
- Our family is not indigenous but are completely in agreement with the views of Annette Steel from the Orange Local aboriginal Land Council, Appendix Z page 156. It is beyond comprehension that under any circumstances this proposal would be considered appropriate.
- The concept of the storage of 85million tonnes of toxic waste in the headlands of the Belubula river is beyond community and social expectations.

The tailings dam must meet current safety standards.

We MUST NOT risk the health of our rivers.

6. FARMLAND

Regis claims that the land on top of the tailings dam will be improved compared to the land before the mine. This is a ridiculous statement. To suggest that levelling the site and depositing a thin layer of top soil over a toxic mix of tailings improves the soil is completely misleading. (*The EIS is false and misleading*).

The farmers in Blayney shire benefit from relatively high rainfall and a cooler climate. With careful management of their soils and fertilizer regime this is highly productive country which in the worst drought ever has managed to continue to produce pasture and turn off well finished livestock.

To categorise the land purely based upon its slope and a soil test demonstrates a complete lack of understanding of how farmers operate in practice. You only need to drive through the district as it is right now to appreciate this farm land is a rare commodity in Australia and it should be protected.

The McPhillamys proposal will damage not only the land at the site but also the farm land in the surrounding area. Regis has admitted the water table will drop as a result of its operations. Inevitably this will reduce the productivity of surrounding farm land.

This is a small gold mine with limited benefits to the community and State for only a ten year period, any damage to the productivity of a rare commodity – high rainfall, cool climate, highly productive farmland – is not justified.

7. SOCIAL AND FINANCIAL IMPACTS

There are many families which are directly affected, particularly in the Kings Plains area and properties surrounding the mine site, whose property values have already been significantly damaged, who have been placed under severe psychological stress and whose health will be put at risk by this proposal.

Cadia Valley is currently undergoing a \$700million expansion of its world class gold, copper and molybdenum deposit. Further competition for scarce water and other resources threatens the viability of the existing operation.

McPhillamys is a small mine with a low grade ore deposit (1gm /tonne) and a projected life of only ten years. The number of jobs for Blayney residents is relatively small and the revenue to NSW government is immaterial.

McPhillamys is only financially viable because the proposal does not reflect the true costs to the community. It does not include the costs of:

- Buyout of residents within a reasonable buffer zone
- Buying sufficient land to position the tailings dam in a more appropriate location
- Proper remediation of the tailings dam and the mine, the site will be left with a permanent void 1000m across and 460m deep
- Filling in the void with PAF waste. Instead the project builds a waste rock dump adjacent to the Mid Western Highway
- Removal and remediation of the 60km pipeline from Lithgow to Kings Plains.

The proposed mine at Kings Plains will :

- permanently destroy the landscape and views as you approach Blayney.
- will damage the amenity for all Blayney residents, the mine lights will be clearly visible from town, the river will have less flow and will be polluted.
- will put at risk many businesses in the Blayney district and irrigators beyond Blayney who rely upon the Belubula.
- property prices for the whole of Blayney are likely to be reduced in the long term, nobody would choose to live within such close proximity to a mine.

Thankyou for considering our views

Mike and Frances Retallack

