

Department of Mining, Exploration & Geosciences
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Thursday 16 November 2023

**Submission
Critical Minerals and Hi Tech Metals Strategy.**

Dear Sir/Madam

Thank you for the opportunity to make a submission concerning the Critical Minerals and Hi-Tech Metals Strategy. I am doing so on behalf of the Central West Environment Council, (CWEC) which represents fourteen environmental groups from most major centres in the Central West of New South Wales. Whereas we are supportive of renewable energy and are aware that the industry requires a range of minerals and hi-tech metals, we do not support exploration and mining at the cost of the environment.

The recent statutory review of the *Biodiversity Conservation Act 2016* revealed the parlous state of the environment in New South Wales. It recommended that New South Wales adopt a “nature positive” approach to future development of policies and strategies if we are to seriously tackle the looming threat of large-scale biodiversity loss. CWEC would like to see this approach reflected in the above strategy.

We are concerned that the current NSW Critical Minerals Strategy was developed by the previous Coalition Government. We trust that this consultation process is aimed at improving the strategy.

We note that the consultation process includes ‘*support for NSW’s strong environmental, social and corporate governance (ESG) position*’. Our key comments are based on the lack of acknowledgement of the environmental and social impacts of mining and the significant land-use conflict in the region in the current strategy.

The strategy highlights the need for important minerals necessary for a hi-tech renewable energy future. It also enthusiastically extols the opportunities for mining

and investment in the Central West. Reference is made to the exemplary environmental standards enjoyed by the New South Wales mining industry. However, these standards have been seriously tested by the recent pollution emissions from Cadia goldmine. The community has serious concerns about the regulation of the mining industry in NSW.

Unfortunately, there is no reference made to any strategy for the preservation of biodiversity and wildlife habitat. There is also no recognition of the large volumes of water needed by the mining industry for processing metals and for suppression of dust. Water sources in the Central West are over committed for existing users and capped under the Murray-Darling Basin Plan. Ongoing competition for water licences threatens the agricultural industry, town water supply and environmental health of river systems.

CWEC acknowledges the necessity for the mining of minerals to support our transition to renewable energy. However, we have great concern that there appears to have been little thought about how this can be achieved while at the same time preserving our environment. We are deeply concerned about the reference made to fast tracking and the avoidance of "green tape." This would imply that, rather than consider the needs of the environment and community when contemplating a project, the strategy is encouraging the use of methods to avoid environmental responsibility.

If we are to achieve both the aims of creating a hi-tech metal industry and simultaneously adopting a "nature first" approach, it is necessary to include in the strategy priorities which protect biodiversity and habitat.

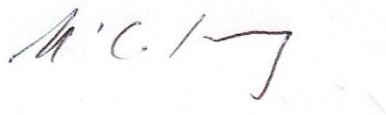
These priorities would include the following:

1. **Biodiversity mapping:** A commitment to identifying important areas of biodiversity within NSW which are to be known as biodiversity hotspots, to be excluded from mining.
2. **Refinement of the offsets scheme:** Biodiversity offsets need to be employed on a genuine "like for like" basis. Mining companies should not be allowed to use offsetting as a "get out of jail" card.
3. **Encouragement of private stewardship:** An amount of crucial biodiversity habitat situated on private land. If it is to be protected from mining, landowners need to be adequately compensated for any stewardship arrangements.
4. **Adequate community communication:** It is essential that the concerns of local communities are addressed appropriately at all stages of the approvals process.
5. **Independent environmental assessment:** Any environmental assessment must be undertaken by consultants who are genuinely independent.

Conclusion: Attractive as the vision for a new "gold rush" in the Central West may be, it should be approached with a view to preserving the crucial environmental habitat that has dwindled alarmingly since the implementation of the 2016

Biodiversity Act. Since its implementation in 2017, native habitat has continued to be destroyed at an increased rate. Biodiversity continues to be threatened at escalating levels by feral weeds and introduced species. Land clearing and inappropriate and poorly regulated development has continued to contribute to wildlife habitat destruction. We cannot afford to have a mining boom further contribute to the biodiversity woes of our state. CWEC urges the Strategy to include the above environmental safeguards to ensure that it is sustainable as it claims to be, and that mining and the environment can coexist.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'N.C. King', with a stylized flourish at the end.

Nick King
President

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