



870 Ophir Rd  
Summer Hill Creek  
NSW 2800  
[www.cwecouncil.com](http://www.cwecouncil.com)

NSW Environmental Protection Authority  
[cadialicencereview@epa.nsw.gov.au](mailto:cadialicencereview@epa.nsw.gov.au)

Friday 19 April 2024

**Submission to the review of Cadia Mine Environmental Protection License 5590**

To whom it may concern

I am writing this submission on behalf of the Central West Environment Council (CWEC). CWEC is an organization which represents fourteen environmental groups within the Central West of New South Wales. Most of the groups represented have been dealing with issues related to the impacts of mining. We are therefore concerned that the review in question is successful in ensuring that Cadia Mine meets its legally required environmental conditions and that the conditions of operation reflect current best practice. For this to happen, the following conditions need to be stipulated and enforced where appropriate.

**The conditions imposed by the review must reflect the current restrictions which are imposed for new operations.**

Cadia mines have been in operation for three decades. There have been significant changes in pollution legislation since then. There has also been important research conducted into the impacts of mining on the natural environment, water and air quality. The review must consider best practice and current scientific research which may go beyond mere legal compliance. The top priority for this review should be the protection of the community and the environment. For this to happen, conditions imposed as the result of the review must reflect best practice.

**The review should include clear and appropriate consequences for noncompliance.**

Frequent reference was made in the parliamentary inquiry into the health effects of metal mining to inadequacy of penalties for environmental breaches. It is essential that this review includes clear penalties for noncompliance and that they be appropriate to the scale of pollution.

### **Independent testing and monitoring is essential**

Although it is important for the Cadia mine operators to conduct inhouse environmental testing and monitoring, it is essential that regulating authorities carry out regular independent assessment and monitoring of environmental factors. It is also important that these results be made available to the public. The need for independent testing and monitoring was an issue frequently referred to in the parliamentary inquiry.

### **There needs to be tougher limits on air pollution**

The EPA Environmental Protection License Review document refers to the inadequate monitoring of Cadia's dust emissions. Airborne dust pollution has been the subject of great concern to the local community. The review needs to include conditions which strengthen the air emission limits for the mine ventilation system and any dust emissions from the entire site. There also needs to be a more comprehensive monitoring of the types of air pollutants contained in the dust emissions, more frequent and independent audits and enforced penalties for noncompliance.

### **Water monitoring requires improvement**

Monitoring of both surface and ground water has been identified by the EPA as inadequate. Water has been a long-standing issue with the local and wider community associated with the mine. As with air pollution, there is a need for independent ground and surface water testing. There also needs to be a regular testing regime enforced, with a tightening of concentration limits for metals identified as being present in the groundwater. Strict adherence to guidelines must be enforced.

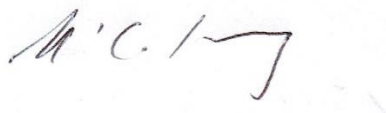
### **Community access to information**

Another issue raised in the parliamentary inquiry into the environmental impact of metal mining was that of transparency and access to information by community stakeholders. A condition of the review should be that Cadia publishes information on environmental monitoring in a way that can be accessed by community members who do not have technical expertise.

### **Conclusion**

CWEC welcomes the opportunity to comment on the review of Cadia's Environmental Protection License. Our organization emphasizes the need for the prioritization of the health of the environment and the community in the process of mining. This review needs to reflect this by imposing conditions which clearly reflect such a priority.

Yours sincerely



Nick King  
President, Central West Environment Council