

Environment Protection Licence 5590 – Submission to the Environmental Protection Authority (EPA)

Due: 5.00pm Monday 22 April 2024

Background

The Environment Protection Licence (EPL) requires Cadia mine to meet legally enforceable conditions relating to noise, air, water, land contamination, waste and other operational matters. This licence is up for review **now**.

The EPA has invited the community to comment on the current licence and what changes we would like.

- Air emission limits
- Monitoring conditions
- Community access to information

The CCSN has identified some potential changes, highlighted below. Please feel free to use this as a base and add your own thoughts and experiences.

You can fill out a survey at [Cadia mine licence review | NSW Environment Protection Authority](#) and/or provide a written submission by emailing cadialicencereview@epa.nsw.gov.au

1. For All Submissions

- **The effective date of the EPL must be amended at the time of each five year review. Protection of the community and the environment must be a priority.**

Since the EPL was granted to Cadia almost thirty years ago, there have been significant legislated reductions to the allowed levels of emissions into the air, these improvements are required for new operations. Despite the massive change in Cadia's activities compared to when the mine started these lower emission levels have not applied.

- **The EPA should use the full force of the law to bring about cultural change in the mining industry.**

Changes are required to the EPL to enable the EPA to force change in the mining industry.

Fines imposed by the EPA are too small and it is too difficult for the EPA to successfully charge the mine operators.

Industry executive should be held personally accountable, and Tier 1 and 2 offences pursued by the EPA. Regulatory change is required to make it easier for successful charges to be brought against CVO.

- **Increase in independent testing and monitoring by the regulators**

There is an almost total reliance on self testing, reporting and self monitoring by the mine operator.

2. Air Emission Limits

- **Tougher limits on air pollution.**

Air emission limits need strengthening to better protect the health and amenity of the surrounding community.

- **The limit on air pollution emissions from vent shafts needs to be reduced. Cadia mine must be held to the Category 6 limit of 20 mg/m³.**

- **Site wide cumulative air emission limit needs to be imposed.** For example, a vent shaft has a specific limit, but there is no consideration of the cumulative effect of emissions from the multiple vent shafts and the tailings dams.
- **Maximum limits on the type of pollutants being emitted.** Pollutants measured should include but not limited to minerals, salts and man-made substances such as diesel, PFAS etc.

2. Monitoring Conditions

- **Air quality monitors should be installed that measure the type and amount of pollutants resulting from mining activities in real-time. The community and the regulatory authorities must be able to access this data in real time.** These monitors must be located in suitable positions, approved by the regulatory authorities.
- **Location of monitors must be reviewed by regulatory authorities at least with every licence approval (5 years) and address the developing nature of Cadia's operations.** Monitors around the mine site have been in the same location for years, ignoring increases in production and vent shafts is ridiculous.
- **Exceedances of pollutants must be enforceable and enforced** to ensure the safety of the community and the environment.
- **More frequent independent audits** to ensure Cadia mine's compliance with monitoring conditions.
- **Rehabilitation must be an ongoing process.** Meeting rehabilitation milestones should be a licence condition.

3. Water Monitoring (both surface and ground water)

The community relies on both surface and groundwater (bores). We need tighter monitoring to ensure that our essential water sources are not contaminated by the mine. The Belubula River and its creeks MUST be protected.

- **The EPA must independently test Monitoring Bores**
- **Monitoring Bores must be positioned around the entire site, finding no contaminants for a period is not an excuse to stop monitoring.** The testing of these bores on a regular basis is the only way to determine if a problem is developing.
- **Tighten concentration limits for metals, nutrients, chlorine and other pollutants in line with water quality guidelines. The EPL should include a full list of contaminants and their maximum allowed limits.**
- **Water quality data should be presented over the long term (life of the monitoring bore), long term trends and comparison to baseline data is critical.**
- **Track surface water quality in the water sources surrounding and downstream of the mine.** We need to measure pollutants as well as assessing salinity, turbidity (how clear or murky the water is), oxygen, temperature and pH levels.
- **All monitoring data to be publicly available and presented in a simple and legible manner.**

4. Community access to information.

- **timely access to meaningful data, greater transparency around monitoring data (air and water).**
- **stronger requirements to publish all information and data on pollution levels and site operations in a way that's accessible and understandable for inexperienced individuals.**