

**Elsie Howe – Résumé of Address to Commissioners**

P.A.C. Public Hearing Dubbo 4 November 2014

Review of Zirconia Mine Proposal, following release of the  
*Environmental Assessment Report*

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Thank you, Commissioners, for this opportunity to address my concerns directly to you.

**I wish to reinforce all the comments I made in my submission last year, that I feel strongly that this project should not be allowed to proceed.**

*In the five minutes allowed me, I do not anticipate being able to cover all the points I wish to raise, so I would direct you also to my written submission, thank you, ~~to which I have attached my previous submission for reference~~, for a listing of those points of concern to me, together with an outline of my background, which I'm sure will be relevant to my making the following comments.*

**Having now read the updated *Environmental Assessment Report* I continue to be seriously concerned on behalf not only our local community, but also from wider implications at State and Federal level.**

**I am seriously concerned** at the responsibility given to the Proponent to do much of its own monitoring and auditing, in some cases (such as the three-yearly monitoring of the major traffic-conflict junction of the Obley Road and Newell Highway) at frequencies I would seriously question. Again, given the many adverse events which have occurred in the mining and industrial sector over many years, both accidental, unforeseen or as a result of negligence, will it be up to the Proponent to for example judge how 'regular' is 'regular' in 5.1.1, regarding reviews and updates of the Water Management Plan? As a member of the general public, in the light of such industrial incidents I question the optimism throughout the document of such statements as 'is unlikely to', 'is not predicted', which frequently occur.

**I am seriously concerned** at the capacity of the many State and Federal Government departments involved in being able, as a coordinated team, to continuously and long-term undertake spot-checking and regular monitoring of compliance ahead of breaches or needs, given constant re-shuffling of government departments, responsibilities, staff and funding, and changes to government.

**I am seriously concerned** with the validity of many of the current criteria with which the Proponent will have to comply in order to ensure adequate safety into the future, particularly in environmental matters such as water issues, biodiversity and air quality, given the lack of long-term data applicable to this region and the public experience of shortcomings of standards set in past mining and industrial ventures – asbestos is one, with which Bernie Banton's protracted fight will long be remembered. Do we want this for the Dubbo Region?

**I am seriously concerned** at the apparent omission to address the environmental consequences of an extreme bushfire event such as occurred right across this regional landscape in 1984. My apologies if I have missed any consultation with the RFS and others on this particular matter. Given the predicted long-term trend to more extreme weather events, when this is coupled with the volume of dangerous goods at the site have the health and environmental results of a catastrophic fire been adequately addressed?

**I am seriously concerned** that the advances made over the past 20 years since the inception of Landcare, notably in the adjacent Little River Catchment, may not have been given due weight in the potential for improved long-term agricultural production, on both the proposed mining site and adjacent land which will doubtless be affected by it; 'current' agricultural practices were cited by the Proponent, rather than 'potential'.

**In my almost half a century residing in Dubbo, I have seen it grow from a very basic rural town of 15,000 to a diverse city of 42,000.** From being a town the mention of whose very name, unjustifiably, brought responses of scorn we all now love the feedback we invariably receive when we mention our city – either “We’ve been to the Zoo and we love it!” or “We’re planning to visit the Zoo!”

**After many, many years of striving for cultural diversity in a city we now have those generators and catalysers of that much-needed diversity in our Regional Theatre and Convention Centre and Western Plains Cultural Centre.**

**What price** the perception of visitors as they fly into Dubbo, promoted as a pleasant regional city, to see the start of slag heaps, tailings dams and open cut mines scarring our landscape.

**What price** the perception of those arriving by road to find they are sharing it with heavy machinery or the snarls of round-the-clock, seven days a week change-of-shift traffic.

**What price** their perception, when at the Zoo, when subjected to the noise of blasting just a few kilometres away.

**I submit that the stability of the region and the environment will best be served by continuing the far more albeit slower but sustainable and adjustable growth provided by cultural and tourism development, and also from the many educational and university facilities which our city now proudly supports.**

**They are positive attributes in our City, and without the immediate and very long-term social and environmental negatives with which our community – and the State and Federal Governments – could well be left to address and pay for, as with other mining ventures, if this proposal is allowed to proceed.**

**I urge the Commission to firmly reject the Proposal.**

**Elsie Howe** 

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Elsie Howe [REDACTED]

Written submission to P.A.C. Review of

Zirconia Mine Proposal: Environmental Assessment Report

***Background*** I was speaker no 9 at the 4 Nov 2014 Hearing in Dubbo. You have a copy of my address.

*I have live in Dubbo for almost 50 years, and have had an active focus on both local and wider environmental matters since studying Natural Sciences at tertiary level for three years in London in the early 1960s. I am well aware of the cumulative effects of industrialisation, particularly given the longer time-cycles at which our local environment functions.*

**I sincerely hope that the proposal is not permitted to proceed for the following reasons:**

**1)** Given the proposal is the first of its kind in Australia, we have no previous experience of the very extensive body of standards which are required under Australian conditions.

I note also the predicted emissions were based on a Processing Plant still in its design phase. I am seriously concerned that it will be AZL and not an independent authority which will at the beginning validate actual emissions against predictions from the final design.

For a continuous 7-day-a-week, 24-hours-a-day operation I think the general public can rightly expect the relevant Government regulatory bodies to be setting, and be in control of, standards in advance of establishment of any hazardous industry, ones which have a wide safety margin.

If this doesn't apply to everything in the process, the development should not, on all safety grounds, be allowed to proceed.

**2)** Given the proximity to a major town, and uncertainty about the long-term implications to that prime resource, water, both in availability and quality, for both domestic and other use, particularly agricultural, the precautionary principle should apply, and development not be consented to.

**3)** I do not agree that the offset measures will more than compensate for all the total environmental disturbance precipitated by the infrastructure and activities associated with the development and operation of the Toongi site.

The 20km transmission line to Geurie (*incorrectly spelled on p. 17*) Limestone Quarry, the Quarry development itself, the 30km gas pipeline, the 7.5km water pipeline, traffic movements along feeder roads etc – all will have their own flow-on effects across the landscape.

Also, nearby specialised habitats such as Gibraltar Rock could well be affected, particularly their fauna, by lights, noise, night-time activity etc. A professional survey there has already pointed to it being a potential habitat for up to 10 Threatened Species ([dubbofieldnats.org.au](http://dubbofieldnats.org.au) –Sites to Visit).

Given the wide seasonal and long-term fluctuations in flora and fauna presence, and noting the limited time-frame in which the Proponent had to survey the site and surrounds, I deem insufficient data would have been available for the Proponent to give a true picture of actual and potential biodiversity in the immediately wider area, resident, dormant and migrant, which could be affected by the development. More offsets could actually be required if viewed from this total standpoint.

4) I agree with concerns OEH expressed on p 17 of the E.A.R. about the effects on the 20km route to Geurie of the transmission line and the establishment of the quarry at Wellington.

If the importance of the quarry deposits has not been assessed from a perspective other than a source of limestone, this is a major omission needing scrutiny, given the international importance\* of their associated deposits.

In *The Dubbo Region – a Natural History* (pub. Dubbo Field Naturalist and Conservation Society 1984) it is noted:

*The Pleistocene bone breccia deposit in the Wellington Caves is famous for the remarkable number of bones of extinct marsupials that are preserved there. Similar bones were also discovered in cave fillings in the Geurie limestone quarry.'*

(\*The Caves were cited in Charles Lyell's iconic 1800s work on Geology.)

5) I recognise that the maximum extraction that the Proponent has applied for in reality could actually be far less, given the unpredictability of markets. The input to the economy could also then in reality have the potential to be far less than is optimistically predicted.

6) If AZL's structure is even partly overseas, then the tax benefit to Australia might also not be as great as predicted.

7) I am surprised the Health Department did not raise any concerns, particularly regarding its capacity to cope with a major or catastrophic incident at or related to the mine.

Dubbo Hospital has often barely managed over the years to keep up with the needs of the current regional population in both staffing and facilities. Would adequate and immediate funding be available to undertake any upgrades deemed necessary to cope with major incidents?

8) I repeat again the concerns I have regarding the apparent lack of mention of catastrophic bushfires moving through that entire area, as last happened in 1984. There was then no hazardous industry in the area storing dangerous goods in such quantities on site.

Not only could such a bushfire produce airborne hazards injurious to humans and the environment, I question the subsequent integrity of the linings of the LRSF, and the SRSF and Salt Encapsulation Cells if they are not at the time full and contents sealed and buried.

9) Given the lack of long-term data on HDPE liners, it is a matter of trust that the 'potential contaminants' accumulated during operation WILL remain isolated from the environment in perpetuity. The huge volumes of waste have the potential to become a very large environmental hazard.

I think the NSW public require 100% confidence that this will not happen, and I for one do not have that confidence.

**For all the above – and others I unfortunately do not have time to itemise – I trust the Commissioners will exercise precautionary restraint and not grant approval to the Application.**

**Elsie Howe 7 November 2014**