

My name is Nana Peters and I am here today on behalf of our Incorporated group of 32 farming families who live and farm in the vicinity of the proposed borefields for this project.

To be clear, we do have major concerns with regard to Cleanteqs proposed water take from the borefields. The proposed project before you today is, we submit, more than just a minor modification to an approved project to allow surface water take from the Lachlan river. We submit that it is in essence a totally new project.

The Sunrise mine was granted Consent Approval in 2001. The EIS work, including a description of the existing environment and assessment of the likely impacts was done even earlier, some 20 yrs ago. The project has in fact NEVER materialised, indeed it was mothballed. THAT makes this situation incredibly unique and the world has moved on over those 20yrs. In our zone 5 of the Lachlan catchment for example, there are now approx. 60 new bores of which around 13 are irrigation bores. Farmers did not just sit around waiting for this project to perhaps materialise, rather they got on with the business of food production and development of their farms.

One of the dramatic changes to the existing environment is that now far more groundwater is being used than 20 yrs ago, and coupled with climate change and extended dry periods, the baseline environment has changed enormously.

Commissioners, we earnestly submit that new water impact modelling should be carried out prior to any approval of MOD 4.

We further submit that it would be grossly unfair to those farmers who have tried to become more efficient by developing their farms, to have the rug pulled out from under them with loss of groundwater due to increasing the pressure of water take on an already stressed aquifer.

We would refer you to the water modelling for the original EIS in 2000. That work was deemed flawed and inadequate by the Independent hydrogeologist Peter Dundon, engaged by DPE to review the model. The DPE should be asked to explain why it ignored Mr Dundons findings and approved the project.

Commissioners, because the project has never materialised and because the baseline environment is dramatically different to that of 20 yrs ago, the water modelling, considered inadequate at the time, should be considered out of date and needs to be brought up to 2018 standards.

We are not opposed to this mining project and we recognise the benefits that may flow from such an industry. However what we as near neighbours to the borefields are seeking is ;

1. A contemporising of the groundwater model and see what it reveals
2. Determining if it is still consentable, and if so then the consent conditions must protect us from any adverse impacts from the mines water take so as to not compromise local business.
3. If adverse impacts are caused by mine water take, that there will be robust, transparent conditions requiring the miner to promptly cease and desist pumping and fix and compensate us for damage.

4. Consent conditions must place the burden of proof of impact, on the miner to prove they have NOT caused harm, rather than placing an unfair burden on the farmer to convince the miner, DPE and DPI water of the damage.
5. We seek an absolute assurance that if this project goes ahead, it will not be at our expense, and if the private mining company is to make profits, it must not be at our cost.

When this project was taken out of mothballs last year, we residents at the borefields site were not approached or informed, indeed until we attended a meeting with Dept Planning at Trundle, we were not on the radar screen at all, the proponent stating that there were no community concerns around the borefields. Our formation as an inc group of 32 members would clearly suggest otherwise. Recently Cleanteq carried out a bore census covering 73 properties and 155 bores, however the information gleaned from this census is basic at best, ie bore locations, SWL's, and Ec readings. Data loggers have only recently been installed on 2Ctq bores. This is too little too late with regard to data gathering.

In essence this project is about to extract a significant amount of g/water based on a doubtful model prepared inadequately 20 yrs ago.

Currently the miners have licence to take 3154ml pa, this is approx. 10ml per day everyday for the life of the mine. Existing irrigation bores in zone 5 are rated at 10ml per day and LESS, anecdotal evidence suggests that a bore yielding 10ml a day drops by a significant amount after a few days pumping, possibly up to 1.5 ml and farmers have to account for this while irrigating. Also irrigators pump for approx. 2-3wks and then stop, thereby allowing the bores to recover; at this particularly dry time when gw extraction is high anecdotal evidence is pointing to a longer recovery time and a lowering of the SWL.

We contend that Cleanteqs water take will both interfere with farmers new and old bores, and lower SWL's. Our farms, livelihoods and communities depend on our continued access to our gw, whether irrigation or stock and domestic. Cleanteq must have contingency plans to scale back operations and development in the event of water shortage and not do as other mines seem to and "ramp up" extraction when water supplies dwindle.

The consent conditions that are in the GWMP are too subjective and open to a broad interpretation, for example phrases such as "adverse impacts" and "compensatory supply" seem to confer confidence, but who judges the adverse impact and how in the real world would any compensatory water supply work. The process outlined would be time consuming and based on other mine sites would unlikely to be resolved in a timely manner, in addition farmers would bear the burden of proof to show adverse impact. The onus of proof should be on the proponent to prove that its activities have not caused an "adverse impact".

We are seeking clear and transparent ongoing monitoring that includes real time data available to farmers on the internet, in the same way river information is available.

We are also seeking to have a say in the GWMP, specifically the setting of trigger levels to investigate any potential negative impacts.

In addition there should be collaboration with farmers in a plan to respond to exceedance and to mitigate adverse impact.

The current position of govt dept and Cleanteq that they intend to manage adverse impacts before they happen is ridiculously optimistic and rather unbelievable in the real world.

Independent Planning Commission, please show us by your actions that private mining company profits will not be at the expense of landholders, local business and the public.

Thankyou for your time today.