

AFANT



EIS Submission:
Tom's Gully Underground Project

Representing recreational fishing in the NT and ensuring the quality of our sport

PO Box 40694 Casuarina NT 0811

Phone: 08 8945 6455 Fax: 08 8945 6055 Email: eo@afant.com.au

www.afant.com.au

Introduction

The Amateur Fishermen's Association of the Northern Territory (AFANT) welcomes the opportunity to provide comment on the Tom's Gully Underground Project Environmental Impact Statement.

Recreational fishing is an important social and cultural component of the Northern Territory lifestyle as well as being a major tourism drawcard and a significant contributor to the economy. Recreational fishing surveys and fishing tour operator data indicates that more than 35,000 Territory residents and 54,000 visitors participated in recreational fishing in the Territory in 2010 and recreational fishing was estimated to contribute at least \$100 million directly to the Northern Territory economy during 2014.

Recreational fishing provides significant cultural, economic and social contributions to the Northern Territory and unless proper environmental procedures and management practices are put in place for Tom's Gully Underground Project (TGUP) there may be unacceptable negative impacts on this industry.

Identified Risks

While there are a number of significant environmental risks to be considered in the assessment of this project proposal, AFANT will confine its comments to those issues with the potential to impact on recreational fishing.

These recognised risks include;

- Proposed management of water quality and quantities;
- Management of waste rock and other material with potential to produce Acid Mine Drainage (AMD) and/or saline drainage (SD);
- Erosion and sedimentation;
- Financial risk and the rehabilitation bond

AFANT is especially concerned with the health of downstream aquatic ecosystems in Mount Bunday Creek and Mary River National Park as a result of the Tom's Gully Underground Project (TGUP) as these areas include the iconic fishing locations of Hardies Billabong, Corroboree Billabong, Shady Camp and the Mary River system.

Our main concerns revolve around the discharge of water into Mount Bundy Creek, separation of clean water and dirty water through the mine site, sedimentation and surface water run-off and the storage of tailings to minimise downstream contamination risks and the potential acidification of groundwater through AMD.

AFANT understands that treated water is proposed to be stored in a 2.1 GL capacity WSD on-site and then be discharged to Mount Bundy Creek during subsequent wet seasons when there is sufficient dilution capacity available. AFANT is comfortable with the water being treated to meet 80% ANZECC and ARMCANZ (2000a) criteria however we believe that environmental factors need to be considered in regards to planned wet season water releases. This concern relates to a strong El Nino influence resulting in more extreme weather events but reduced overall rainfall in the Mary River Catchment. AFANT would like the proponent to acknowledge that this likely reduction in overall rainfall will have an effect on wet season discharges and could result in TGUP being unable to discharge as frequently as needed to maintain a sufficient dilution capacity.

AFANT also has concerns regarding the storage of tailings in TSF2. This dam is designed to store 350,000 t of tailing solids with an average beaching slope of 1v:120h, at an assumed density of 1.2 t/m³ while maintaining a 0.5 m freeboard, even during an extreme rainfall event (1:100 year, 72 hour duration). While these concerns relate to use of the 1:100 year extreme rainfall event AFANT believes this data should be more precautionary based on the large number of extreme weather events in the past thirty years rather than the lower average rainfall events of the past one hundred years. Rainfall events in the Mary River Catchment have frequently been recorded at higher than the 1:100 levels by NT Parks and AFANT believes there is a serious risk of TSF2 overflowing and contaminating the downstream environment unless a more precautionary slope and greater freeboard is put in place.

AFANT also believes greater measures need to be put in place for the management of stormwater and the potential for on-site erosion and sediment loads during these extreme weather events. These greater control measures also include sediment control and erosion runoff during the clearing of approximately 93 ha of native

vegetation at TGUP (54 ha being for WSD, the remainder for borrow materials, new access and drainage) during the construction phase prior to operation.

AFANT would also like more information to be made available by the proponent regarding the groundwater monitoring network of on-site. The EIS identifies that there is potential at TGUP for a water table fluctuation of up to 3.5M between the wet and dry seasons and groundwater seepage has been identified as possible issue from the WRD, Evaporation ponds and TSF's. This raises concerns about possible groundwater flow of AMD and contaminated water from the site into aquatic habitats downstream. AFANT believes a more robust groundwater monitoring system with expanded monitoring sites must be put into place prior to TGUP becoming operational.

A number of potential issues and risks contained in the EIS also need to be considered in relation to the current financial environment and potential environmental impacts if economic factors go against TGUP. While the EIS addresses the best case scenario regarding financial viability it is essential that all alternatives be considered as well as the international financial situation in regards to the gold price and exchange rates plays a big part in ensuring the viability of this project.

History has shown that past Northern Territory governments have been willing to circumvent best practice environmental management and bend the regulatory process in order to get mines up and running or keep struggling mines operating. This is a significant risk that needs to be managed for TGUP.

The mine management plans and future rehabilitation stages of the TGUP need to be conducted, regulated and enforced by government. In addition there is a potential financial risk to taxpayers if this project fails and government funding is required for the clean-up and rehabilitation. This risk must be factored into the bond prior to the TGUP approval.

It is essential that this bond needs to be of sufficient value to address the size and scale of current risks and threats at the site and any newly identified future risks

given the size of this facility and the cost of managing the ongoing operational requirements of the site like pumping and water management that will need to be conducted in the event of an emergency shut down or if the mine goes into caretaker mode.

Conclusion

AFANT has a strong commitment to ensuring the protection and the quality of recreational fishing in the Northern Territory. Recreational fishing is a major contributor to the economy and lifestyle of the Northern Territory and must be nurtured and enhanced by the Government for current and future generations.

We have an extremely strong interest in ensuring that the proposed mining operations and post closure rehabilitation of the site can be conducted in a manner that removes any current and future water and pollution risks at the TGUP site.

We would welcome the opportunity for greater engagement and consideration of AFANT's views.

Yours sincerely



Tristan Sloan

Executive Officer

Amateur Fishermen's Association of the NT Inc.

30th October, 2015