

To: NSW Parliament Portfolio Committee No. 2 - Health

Re: Inquiry into current and potential impacts of gold, silver, lead and zinc mining on human health, land, air and water quality in New South Wales

Responses to statements made in the transcripts

18 September 2023, 3 & 27 October 2023

Submitted: 5 December 2023

The purpose of this document is to respond to particular assertions made by witnesses, as recorded in the transcripts of the Parliamentary Inquiry, on particular issues relating to the McPhillamys Gold Project (the **Project**). This document is not directed to addressing each and every statement in the transcripts with which Regis takes issue. Rather, it constitutes a non-exhaustive response to particular issues.

1. Air quality and dust

“So you’re not aware of any containment measures that may be in place?” The Hon. Susan Carter
“No.” Claire Bennett¹

“They have met with us a couple of times since, but they’re still not taking the severity (sic) of what their mine will have detrimental effects on.” Claire Bennett²

Regis disagrees with this statement

Regis has met with representatives of the Goldfields group of companies at least five times³ between 2019-2023, and had additional phone calls and emails.

On Monday 3 July 2023, Regis met with Mrs Vicki Lockwood, Managing Director of the Goldfields group of companies. At that meeting Regis gave her a number of printed copies of the Consent Conditions to pass on to the other Directors. Numerous conditions relate to air quality monitoring and management.

On Monday 10 July 2023, a follow-up email was sent to Mrs Lockwood and Jon Lockwood, Sam Lockwood and Claire Bennett. The first point confirmed that the purpose of the meeting was to discuss the delivery timeline for the Apiary Monitoring and Management Program (AMMP).

The email referenced the Air Quality & Greenhouse Gas Monitoring Plan (AQGGMP) and Noise and Blast Monitoring Plan (NBMP) which detail how monitoring will be carried out and reported, and confirmed that monitoring results will be published on the McPhillamys website.

The email acknowledged that the Goldfields businesses continue to have concerns about groundwater, light emissions and dust. Regis staff reiterated that Regis' offer for any of the Lockwoods to meet with experts stands (including water and metallurgy offered in 2022) and that, if there is anyone else they would like to discuss other concerns with, Regis is always happy to arrange.

2. Approvals

"The second point I'll make is that the DPE spoke with our group on one single occasion in the six years...they've been speaking with the proponent every single day for six years to try to get this over the line." Daniel Sutton⁴

Regis disagrees with this statement

The statement that DPE has "been speaking with the proponent every single day for the last six years to try to get this over the line" is clearly incorrect. The McPhillamys team certainly did not speak to DPE daily over the last six years.

We note that, between 2019 and 2022, the Department of Planning attended seven Community Consultative Committee meetings, all of which were attended by Belubula Headwaters Protection Group representative Daniel Sutton. Meeting minutes show the DPE answered numerous questions from Mr Sutton.⁵

At Mr Sutton's request, an out of session meeting solely for CCC members to question DPE was convened on 1 June 2022.

"... (there is) the dependence on post-approval management plans to solve problems that should be addressed during the assessment process." Beverley Smiles⁶

Regis disagrees with this statement

During the approval process, issues are identified and solutions proposed. Consent Conditions require environmental management plans that articulate how Regis will deliver those solutions. Management plans must be approved by the Planning Secretary before construction and mining operations are allowed to commence.

The IPC's approval of the Project was not dependent on post-approval management plans to solve problems that should have been addressed during the assessment phase.

"...lack of determination of water supply for mining operations at the time of approval is a key failing of the assessment process." Beverley Smiles⁷

Regis disagrees with this statement

In granting approval for the Project, the IPC assessed the proposed water supply and site water balance for the Project and imposed various conditions of consent to ensure that there will be sufficient water for all stages of the development.

Standard condition B39⁸, requires the Project to ensure that it has sufficient water for all stages of the development, **and if necessary, adjust the scale of the development to match its available water supply.**

Consent Condition B53⁹ requires Regis to prepare a Water Management Plan to the satisfaction of the Planning Secretary. The plan must include a site water balance that details

sources and security of water supply for the life of the mine (including authorised entitlements and licences). Consent condition B55¹⁰ requires the approved Water Management Plan to be implemented.

Prior to the commencement of development, Consent Condition A7¹¹ requires Regis to supply the Department of Planning with a Water Offtake Agreement that articulates, among other things, the supply of water to the site via the water supply pipeline over the life of the development consistent with the EIS. McPhillamys will source all of the water required for its operations, including dust suppression during mining operations, from an external source.

“...(Mines) compete with other water users including the environment.” Beverley Smiles¹²

Regis disagrees with this statement

McPhillamys is not competing with the environment for water. During operations, McPhillamys will source water from Centennial Coal and Mt Piper Power station.

3. Bees and the apiary industry

“There have also been studies and a couple of deaths in Australia from bees on mine sites falling from lights and attacking workers. There was actually a death in Western Australia a couple of years ago. Their response to that was, ‘We’ll put covers around the lights’.” Claire Bennett¹³

Regis disagrees with this statement

In correspondence with Mrs Vicki Lockwood between September and November 2022, we stated that the DPI website shows that beehives are kept in many areas, including in densely settled residential areas in Sydney and regional towns. Regis believes that McPhillamys employees would be at considerably less risk of bee stings than people living and working near beehives in densely settled areas.

Mine workers are given pre-employment medicals and visitors are required to declare health risks like bee sting allergies at inductions. First responders are trained to use epi-pens which are included in certain on-site first aid kits.

“Is there any process that you are aware of, post the IPC work, that you can link into, which can formalise these discussions to try to get some of your matters addressed? Has that been explained to you?” The Hon. Greg Donnelly¹⁴

“Not that I’m aware of...” Claire Bennett¹⁵

Regis disagrees with this statement

Consent Conditions B104-106¹⁶ require an Apiary Monitoring and Management Program (AMMP) to be developed in consultation with local apiary operators, and that the Program approved by the Planning Secretary must be implemented.

On Monday 10 July 2023, an email sent to Vicki Lockwood, Claire Bennett and other family members included discussion of the AMMP at a meeting we had on Monday 3 July 2023.

“The night lighting is going to have detrimental affects on the bees. They are not going to sleep their normal sleep cycles.” Claire Bennett¹⁷

Regis disagrees with this statement

The potential impacts of lighting on bees and honey production is addressed in the Submissions Report¹⁸ and the Amendment Report 1.¹⁹ Consent Condition B77 requires Regis to take all reasonable steps to minimise off-site lighting impacts and to ensure that no fixed outdoor lights shine directly above the horizontal or above the building line or any illuminated structure.

Lighting (and other issues of concern) were addressed in detail in correspondence with Mrs Vicki Lockwood between September and November 2022.

The IPC'S Statement of Reasons said that the likely impacts on nearby apiary operators could be appropriately managed through conditions of consent.²⁰

4. Biodiversity

“(biodiversity) it’s something that ... the proponents treat it as a tick a box.” Warwick Pearse²¹

Regis disagrees with this statement

McPhillamys' Environmental Impact Study assessed biodiversity impacts under the relevant assessment regime. It included biodiversity assessment reports (BDARs) for the mine site (158 pages) and the pipeline (364 pages). The first amendment report to the EIS included an 875-page update to the EIS BDAR. The second amendment to the EIS included a 752-page update to the mine site and pipeline BDARs. This was in response to a change in the NSW Government's biodiversity offset calculation methods.

Identification of threatened flora and fauna is done using multi-year surveys carried out by specialist ecologists. Biodiversity offset credits are calculated by qualified ecologists.

Consent Conditions B56 and B57 list all biodiversity credits required. Regis must give evidence that all credits have been retired before the pipeline and mine site may begin construction.

The IPC's Statement of Reasons said that it was satisfied that the biodiversity impacts of the Project could be appropriately managed, subject to conditions of consent.²²

“(Regis) can’t even keep the trees alive that they have offset-planted...” Claire Bennett²³

Regis disagrees with this statement

Since 2014, Regis has planted over 10,000 trees. There are numerous tree corridors around the project area, including bordering Vittoria State Forest and along major roads and accesses. They provide visual screening in several sections of the project area as well as creating and enhancing wildlife corridors between existing stands of native vegetation near the site.

One small tree line bordering Vittoria State Forest died. It was not planted for offset purposes.

All trees planted within the tree corridors are native species including eucalypts, acacias, casuarinas, shrubs and monocots. Several species are aligned with Plant Community Type 1330 and/or the White Box, Yellow Box, Blakely's Red Gum, Woodland Threatened

Ecological Community, which supports habitat and foraging resources for the koala and European bees.

The trees planted were grown locally using local nurseries, and in many cases, from seeds collected from the project site for propagation. The tree corridors are inspected regularly. Maintenance activities include fencing, weed control, slashing and the replacement of damaged or dead trees.

5. Climate change

“... (there is) lack of consideration of climate change predictions for inland catchments.” Beverley Smiles²⁴

Regis disagrees with this statement

Climate change was considered in the Surface Water Impact Assessment.²⁵ Consent Condition B53 (d)²⁶ requires Regis to prepare a Water Management Plan for approval by the Secretary before certain activities start. The plan must, “incorporate recent meteorological and climate data and describe the periodic review of new and relevant input data, including sensitivity analysis of variations from climate projections and trends.”

6. Consultation & community sentiment research

“...they actually had a statement from them to say, ‘Sorry, we basically stuffed up. We didn’t realise how big a player you were.’” Claire Bennett²⁷

“We’ve stuffed up. We should have taken you more seriously.” Claire Bennett²⁸

Regis disagrees with this statement

Regis is not aware of, and denies, that any representative of Regis made any such statement to anyone involved in the Goldfields group of businesses. We would welcome any further detail Ms Bennett may be willing to provide.

“The proponent was very selective in their surveying... In direct response to that survey, no. It’s entirely skewed.” Daniel Sutton²⁹

Regis disagrees with this statement

SEC Newgate Research, which undertook the independent research, is a member of the Australian Polling Council and undertook the survey in accordance with the strict ISO-accreditation AS:ISO20252:2019 standards.

Regis understands that, on Monday 25 September 2023, SEC Newgate wrote to the Committee regarding allegations about their integrity.

7. Environmental Impact Statement (EIS)

“I was very disappointed in that (Regis) EIS. I did not feel that exactly that sort of baseline data was adequately documented....water tanks... creeks, farm dams, waterways.” Ian Wright³⁰

Regis disagrees with this statement

Baseline environmental monitoring for the project is extensive and has played an integral role in the environmental assessments prepared for the EIS and Amendment Reports. This data dates back to 2014 in some cases.

The baseline data collected on the project is extensively described in the EIS, the Response to Submissions, Amendment Reports 1-3 and in the various responses provided to the IPC.

8. Independent Planning Commission (IPC) – submissions

“...in reference to the submissions in support, again they were form submissions...” Daniel Sutton³¹

Regis disagrees with this statement

The Independent Planning Commission’s Statement of Reasons states that 725 unique submissions were received – 473 in support of the project, 240 objections and 12 neutral.³²

Of the 473 positive submissions recorded on the IPC website, one of these submissions consisted of 318 unique hand written submissions – the number of positive submissions totalled 791.

Submissions written on forms were not “tick a box”. Each gives unique, handwritten reasons for supporting the project. Those submissions are available under the Form Submissions by Regis Resources on the IPC website.³³

9. Integrity of consultants

“...the reports that appear in an environmental impact assessment are advocacy documents ... people that haven’t agreed with the way that they’re being encouraged to doctor their reports don’t get employed by the industry any more. They get blacklisted.” Beverley Smiles³⁴

Regis disagrees with this statement

Regis rejects outright these allegations against the integrity of the consultants used and their work.

Like all EISs, the McPhillamys EIS was prepared in accordance with Schedule 2 of the EP&A Act 2000, and contained all available and relevant information. Lead consultants signed off, confirming that information in the EIS is neither false or misleading.³⁵

10. Springs

“There are 26 springs that have been recorded in that area. There are also third-, fourth-, and fifth-order streams, which they will be permanently covering. The major concern there is the contamination, the blocking of the river and the health of the river. The river initially uses those springs to feed the river in times of dry when there is no rain.” Rebecca Price³⁶

Regis disagrees with this statement

The relationship between springs, seeps and the Belubula River is well understood, based on extensive monitoring and modelling undertaken to date.

Where springs will be disturbed by project infrastructure, such as the Tailings Storage Facility (TSF), the water will not be lost from the system. Instead, the water will continue to move

underground and will seep out further downstream, still flowing into the Belubula River and within the same catchment.

Over the years, many of the springs and seeps in the area have been excavated by landholders into dams to provide water access for stock. Whilst some springs in the mine development area do contribute water to the Belubula River, most of the spring water does not reach the river as it evaporates first or is used by vegetation or for stock and domestic purposes.

The project will not have a significant impact on streamflow in the Belubula River. The changes that are predicted to occur are within the current natural variability of the Belubula River flows.

IPC's Statement of Reasons stated:

- The estimated increased duration of low flow events is relatively minor³⁷
- The Project would not have a significant impact on streamflow because of changes in groundwater discharge and surface water – groundwater interaction³⁸
- The proposed cyanide handling measures and proposed TSF design are sufficient to minimise and mitigate contamination and seepage risks³⁹.

11. Tailings Storage Facility (TSF)

"...all tailings dams is contaminated water that sits there, so I'm not sure of anything that they're doing to minimise the risk of that." Claire Bennett⁴⁰

"Exposure to water contaminated by toxic metals and cyanide can affect the bee's life span by them drinking from the contaminated tailings dams." Claire Bennett⁴¹

Regis disagrees with this statement

In response to public submissions to the EIS, Regis commissioned EnRisk to deliver a report on potential impacts on European honey bees and local honey production. The report included a detailed exposure assessment that included potential exposure to bees from tailings. ⁴² It concluded that, "...it is not expected that there will be any adverse impacts on the bee industry from metals in dust or from water in the tailings storage facility at the proposed mine."⁴³

In its Statement of Reasons the IPC identified the potential impact of bee exposure to water containing potentially toxic metals and cyanide⁴⁴ and found that the likely impacts of the Project on nearby apiary operators could be appropriately managed through conditions of consent⁴⁵.

Before mining operations commence, conditions B104-106 of the Consent require an approved Apiary Management and Monitoring Program to be in place which must include, "...a research and monitoring plan to assess heavy metal and other mining-related impacts on local apiary operations including...monitoring of sources that may contain contaminants that could affect bee health and honey production, including dust and surface water bodies..."

"There was no alternative (Tailings Storage Facility) ever looked at. It was just this spot because it's already pretty much a valley. It's very cheap for them to just build one wall across the front of it, dig

it up, lay their clay and move on. So it was the cheapest, easiest option; nothing else was ever looked at.” Daniel Sutton⁴⁶

Regis disagrees with this statement

Regis’ Environmental Impact Study (EIS), Appendix D – Tailings Storage Facility (TSF) Feasibility Study, considered more than 30 different TSF options, assessed four possible sites for the Tailings Storage Facility and assessed tailings disposal methods.⁴⁷

Regis’ Response to Submissions, Appendix G – Tailings Disposal Options⁴⁸, further assessed different tailings disposal methods including slurry disposal, thickened tailings or paste disposal, dry stacking and co-disposal with coarse waste. This document included answers to other questions about tailings management raised by the Belubula Headwaters Protection Group during the EIS submissions process.

The IPC indicated in its Statement of Reasons that it agreed with DPE that the Applicant had undertaken a comprehensive analysis of alternative gold extraction methods, TSF design and location, and tailings disposal options⁴⁹.

12. Water

“... minerals mines will not have the water to manage their dust.” Beverley Smiles⁵⁰

Regis disagrees with this statement

The approved water management system for the Project has been designed to provide sufficient water for dust suppression in varying climatic conditions. McPhillamys dust modelling was based on over 130 years of available historical climate data for the site, to accurately calculate amounts of water likely to be needed for dust suppression.⁵¹ We note that chemical dust suppressants are an effective alternative to water. Water requirements for dust suppression and management were included in the water supply pipeline volume design assumptions.

During operations, McPhillamys will source water from Centennial Coal and Mt Piper Power station via the Project's water supply pipeline.

The IPC’s Statement of Reasons said that the air quality impacts of the Project could be appropriately minimised or managed to achieve an acceptable level of environmental performance that is consistent with relevant government policies and guidance.⁵² Air quality impacts are regulated by various consent conditions, including B30⁵³ and B33⁵⁴.

Consent Condition B53 requires Regis to prepare a Water Management Plan to the satisfaction of the Planning Secretary. The plan must include a site water balance that details sources and security of water supply for the life of the mine (including authorised entitlements and licences). Consent Condition B55 requires the approved Water Management Plan to be implemented.

Consent Condition B39 requires McPhillamys to ensure it has sufficient water for all stages of development, and if necessary, adjust the scale of the development to match its available water supply.

Prior to the commencement of development, Consent Condition A7 requires Regis to supply the Department of Planning with a Water Offtake Agreement that articulates, among other things, the supply of water to the site via the water supply pipeline over the life of the development consistent with the EIS.

‘The department of water came out and said, “You do not have sufficient licences to cater for the capture of water which is going to exist for this mine and we can’t approve it without that.” Those licenses did not exist. So the Minister came in and said, “Okay, we’ll just change the water regulation. We’ll just say that you can have special purpose licences further north and only specifically for this project.”’ Daniel Sutton⁵⁵

“...the department changes regulations and water-sharing plans and they give them special purpose access licences after five years.” Rebecca Price⁵⁶

Regis disagrees with this statement

The Specific Purpose Access Licence (SPAL) allows Regis to meet Consent Conditions B51 and B52.

Before construction of the TSF starts, Consent Condition B51 requires Regis to have purchased water access licence shares from below Carcoar Dam to offset the estimated 4% reduction in inflows to the Belubula River Regulated River Water Source.

Consent Condition B52 states that the water shares cannot be used or traded until the TSF is rehabilitated and a free-draining landform established.

“It’s pulling water out of, in that instance, the Coxs River catchment and then sending it into the Belubula River catchment...” Beverley Smiles⁵⁷

Regis disagrees with this statement

Pipeline water will not be released to the Belubula water source. Externally sourced water will be used for ore processing and dust suppression.

The mine development area is designed to be a nil discharge site. The site water management system will operate as a closed system, with water transferred, reused and stored in water management facilities that are designed not to spill in any climate scenario.

The IPC’s Statement of Reasons said that the water supply pipeline, if retained after operations cease, could provide a valuable water supply for various uses in the region, extending the benefits of the Project beyond the mine life.⁵⁸

“...the quality of that (pipeline) water is a bit of an issue anyway.” Beverley Smiles⁵⁹

Regis disagrees with this statement

The water quality of the three proposed water sources currently ranges from around 600 mg/L total dissolved solids (a measure of the salinity of the water) to 7,000 mg/L with a likely average of approximately 3,500 mg/L. For reference, the NSW DPI fact sheet on the water requirements for sheep and cattle identifies the maximum salinity suitable for stock watering in the following ranges:

- Sheep: 5,000-10,000 mg/L generally, and up to 13,000 mg/L for limited periods; and
- Beef cattle: 4,000-5,000 mg/L generally, and up to 10,000 mg/L for limited periods.⁶⁰

“...what happens when that mine is no longer operating? And the same with the power station...”
Beverley Smiles⁶¹

Regis disagrees with this statement

Prior to the commencement of development, Consent Condition A7 requires Regis to supply the Department of Planning with a Water Offtake Agreement that articulates, among other things, the supply of water to the site via the water supply pipeline over the life of the development consistent with the EIS.

“... a 4 per cent reduction permanently will still have a massive effect on the health of the river.”
Rebecca Price⁶²

Regis disagrees with this statement

A temporary reduction of approximately 4% per year to the inflow to Carcoar Dam will occur during construction and operations. The reduction is being offset by reserving water held under water access licences to be purchased by Regis. After mine closure and rehabilitation, flows will be reduced by 0.5%.⁶³

The IPC’s Statement of Reasons said that the impacts to water quantity are capable of being minimised, managed or compensated where necessary.⁶⁴ Consent condition B50⁶⁵ requires water captured in clean water facility dams to be transferred to the Belubula River downstream of the site. Consent conditions B51⁶⁶ and B52⁶⁷ require offsetting of the impacts to the Belubula River Regulated River Water Source caused by an estimated reduction in inflows to Carcoar Dam to be offset.

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- ¹ Transcript, Tuesday 3 October, pg. 3
- ² Transcript, Tuesday 3 October, pg. 3
- ³ Monday 3 July 2023, 18 August 2022, 19 October 2020, 17 October 2019, 22 May 2019
- ⁴ Transcript, Monday 18 September, pg. 33
- ⁵ <https://mcphillamysgold.com/community/community-consultative-committee-ccc/>
- ⁶ Transcript, Monday 18 September, pg. 2
- ⁷ Transcript, Monday 18 September, pg. 2
- ⁸ Development Consent 2023, pg. 15, <https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2022/11/mcphillamys-gold-project/determination/230330--mcphillamys-gold-project--development-consent.pdf>
- ⁹ Department of Planning and Environment NSW 2023, *ibid.*, pg. 17, f
- ¹⁰ Department of Planning and Environment NSW 2023, *op. cit.*, pg. 18
- ¹¹ Department of Planning and Environment NSW 2023, *ibid.*, pg. 6
- ¹² Transcript, Monday 18 September, pg. 2
- ¹³ Transcript, Tuesday 3 October, pg. 6
- ¹⁴ Transcript, Tuesday 3 October, pg. 6
- ¹⁵ Transcript, Tuesday 3 October, pg. 6
- ¹⁶ Development Consent, *op. cit.*, pg. 30
- ¹⁷ Transcript, Tuesday 3 October, pg. 6
- ¹⁸ McPhillamys Gold Project Submissions Report, EMM 2020, 5.6.3, pg. 301, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120200908T224211.249%20GMT>
- ¹⁹ Amendment Report Appendix F: Agricultural Impact Statement Addendum, EMM 2020, 4.4.8 (iii), pp. 26-27, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120200908T223235.215%20GMT>
- ²⁰ IPC 2023, *op. cit.*, pg. 53
- ²¹ Transcript, Monday 18 September, pg. 4
- ²² IPC 2023, *op. cit.*, pg. 50
- ²³ Transcript, Tuesday 3 October, pg. 2
- ²⁴ Transcript, Monday 18 September, pg. 2
- ²⁵ McPhillamys Gold Project Environmental Impact Statement (EIS) Appendix J: Mine development surface water assessment, Hydro Engineering and Consulting (HEC) 2019, Section 3.2.4, 2019, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120190830T001211.705%20GMT>
- ²⁶ Development Consent, *op. cit.* pg. 17
- ²⁷ Transcript, Tuesday 3 October, pg. 3
- ²⁸ Transcript, Tuesday 3 October, pg. 5
- ²⁹ Transcript, Monday 18 September, pp. 30-31
- ³⁰ Transcript, Monday 18 September, pg. 22-23
- ³¹ Transcript, Monday 18 September, pg. 31
- ³² IPC 2023, *op. cit.*, pg. 14
- ³³ IPC 2023, *ibid.*, pg. 14
- ³⁴ Transcript, Monday 18 September, pg. 4
- ³⁵ McPhillamys Gold Project Environmental Impact Statement (EIS) Main Report, EMM 2019, pg. 4, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120190829T235949.739%20GMT>
- ³⁶ Transcript, Monday 18 September, pg. 28
- ³⁷ IPC 2023, *op. cit.*, pg. 40
- ³⁸ IPC, *ibid.*, pg. 43
- ³⁹ IPC 2023, *ibid.*, pg. 37
- ⁴⁰ Transcript, Tuesday 3 October, pg. 6
- ⁴¹ Transcript, Tuesday 3 October, pg. 6
- ⁴² Appendix D: Potential impacts on European honey bees and local honey production, EnRisk 2020, pg. 44 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120200908T224209.775%20GMT>
- ⁴³ Response to Submissions Appendix D: Potential impact on European honey bees and local honey production, EnRisk 2020, pg. 56, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120200908T224209.775%20GMT>
- ⁴⁴ IPC 2023, *op. cit.*, pg. 51

⁴⁵ IPC 2023, *ibid.*, pp. 53-4

⁴⁶ Transcript, Monday 18 September, pg. 30

⁴⁷ McPhillamys Gold Project Environmental Impact Statement Appendix D – Tailings Storage Facility Definitive Feasibility Study, ATC Williams 2019, pp. 12-25 <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120190830T000431.354%20GMT>

⁴⁸ Response to Submissions Appendix G – Tailings Disposal Options, Regis Resources 2020, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120200908T224210.686%20GMT>

⁴⁹ IPC 2023, *op. cit.*, pp. 37

⁵⁰ Transcript, Monday 18 September, pg. 7

⁵¹ McPhillamys Gold Project Environmental Impact Statement Appendix M – Mine development air quality and greenhouse gas assessment, EMM Consulting 2019, <https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120190829T235949.739%20GMT>

⁵² IPC 2023, *op. cit.*, pg. 27

⁵³ Development Consent, *op. cit.*, pg. 13

⁵⁴ Development Consent, *op. cit.*, pg. 14

⁵⁵ Transcript, Monday 18 September, pg. 33

⁵⁶ Transcript, Monday 18 September, pg. 33

⁵⁷ Transcript, Monday 18 September, pg. 7

⁵⁸ IPC 2023, *op. cit.*, pg. 61

⁵⁹ Transcript, Monday 18 September, pg. 7

⁶⁰ EMM 2020 (Submissions Report), *op. cit.*, pg. 5.1.4

⁶¹ Transcript, Monday 18 September, pg. 7

⁶² Transcript, Monday 18 September, pg. 28

⁶³ EMM 2019 (Main Report) pg. 219,

<https://majorprojects.planningportal.nsw.gov.au/prweb/PRRestService/mp/01/getContent?AttachRef=SSD-9505%2120190829T235949.739%20GMT>

⁶⁴ IPC 2023, *op. cit.*, pg. 61

⁶⁵ Development Consent, *op. cit.*, pg. 16

⁶⁶ Development Consent, *ibid.*, pg. 17

⁶⁷ Development Consent, *ibid.*, pg. 17