[redacted]

17 July, 2024

To Whom it May Concern

SUBMISSION ON ENVIRONMENTAL REGULATION OF MINING

Thank you for the opportunity to comment.

I wish to specifically raise concerns regarding the impacts of these regulations inadvertently allowing deeply problematic river sand mining in Roe Creek near Alice Springs.

The same considerations would also apply to other arid zone rivers and sand mines

This is an issue which I and many others have been concerned with for some time. I attach a photo of the damage to the river including the loss of many extremely large river redgums, and a "case card" which describes the issue.

Roe Creek is a relatively small ephemeral waterway with multiple sand mines using the out dated practice of mining the river channel. Contemporary practice is that mines should access sediments away from the active channel. The practice is causing environmental harm.

This mining is having a massive impact on the river with widespread erosion and tree loss. The impacts in this river are especially bad because:

- there are numerous mines with cumulative impacts,
- excavations are too deep and poorly regulated; and
- the Creek is of small size with infrequent and uncertain flows to replenish sediment.

I am opposed to mining in arid zone rivers. The photo shows such mining clearly causes serious and irreversible harm and is therefore incompatible with the principles of ecologically sustainable development. The widespread devastation caused by current activities is proof enough that in-river sand mines cannot be regulated via standard conditions.

This activity is essentially a major interference to a waterway and should be treated as such. ***The exclusion criteria in part 4 of the risk criteria should include the additional category of active river channels.***

While I am opposed to mines in arid zone rivers, if this practice is to continue each mine should be individually assessed under the NT EPA act and excluded from this draft standard conditions. The EPA should include the upstream and downstream impacts of existing mines in its assessment.

In addition the blanket thresholds of a substantial disturbance of more than 10 hectares, excluding access tracks used for the mining activity, at any one time; and the extraction of more than 10,000 tonnes per annum which are outlined in the draft standard conditions are absolutely inappropriate. Sediment replenishment of this amount is not assured especially given the cumulative impact of multiple mines. The details of how sand is to be taken; the nature of the water course; and other mines in the area are just as critical to the impact of a mine as its size.

Erosion from the sand mines propagates upstream and downstream of the site. When rivers flow devastating erosion including loss of old trees and riparian vegetation, physical infrastructure and sacred sites (refer to case card) can and is occurring both upstream and downstream. Furthermore the complexity of modelling the impacts is beyond what a sand mining operator can afford to undertake making this form of sand mining inherently risky and untenable.

Regulation of these offsite impacts of existing mines needs to happen now. Until now there has been no accountability by either miners or the Northern Territory Government for the damage that is occurring in Roe Creek. It is incredibly vulnerable to widespread environmental harm if there is a river flow.

I also wish to raise that established sand mines along the Roe Creek and also other places like the sand mine at Atherrke (Jessie Gap) which is digging up a sacred site, are legacy activities that only became established because of a past poor practice. It is not good enough to simply let these mines and based upon a precedent of past poor practice continue. They are self-evidently environmentally and culturally unacceptable. They need to be moved on as soon as possible. This should be the first priority before this proposed regulation of mining activities.

Thank you for your consideration.

Regards,

Jacqueline Arnold

Copies to:
Arid Lands Environment Centre

Attached
Image of old rivergums felled by upstream erosion from a sand mine
Letters for the Environment Central Australia case card on mining in Roe Creek