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# Public submission on the proposed development of the Beverley Uranium Mine

Release of the Commonwealth ordered draft Environmental Impact Statement (dEIS) by the proponent General Atomics of the USA (100% owner of Heathgate Resources in Adelaide) allows the public to take back direction of uranium issues, the raw material for one of the world's most lethal industries, by recommending rejection of this mining application. Key issues are Australia's responsibility for the nuclear fuel cycle through mining and export of uranium - which has been excluded from the EIS process, protection and management of groundwater, standards of mining in Australia including rehabilitation requirements and waste management, indigenous rights, due process and Government(s) accountability to the public.

## Process - Fast Tracking, Commercial Confidentiality and threatened Legal Action

1) The Environmental Impact Assessment process has been subverted by SA Government approval of 'trial' in-situ leach uranium mining at Beverley on November 17th 1997 without any public consultation. The documentation was withheld by claiming commercial confidentiality. Production of uranium began on 2nd January 1998, six months prior to release of the dEIS. The trial mine, to form the basis of the Stage 1 commercial mine, has been constructed and operated without Commonwealth EIA assessment or approval under the Environment Protection (Impact of Proposals) Act 1974, it must be removed and rehabilitated.
2) Government has allowed the proponent to exert legal pressure on the traditional owners of the area, the Adnyamathanha people, by threatening legal action against them if they did not sign a mining agreement on General Atomics terms by mid July 1998, only weeks after release of the dEIS. General Atomics claims this is negotiating in good faith. The Adnyamathanhha people have been discriminated against and must receive the same right as other Australians to due process and fair treatment, to participate in, and consider the outcome of the EIS process.

## The proposed Sulphuric Acid In-Situ Leach (ISL) Uranium Mining Technique

There has never been a commercial sulphuric acid ISL uranium mine in the western world, all US ISL uranium mining use a less polluting alkaline leachate. The acidic ISL mines across Eastern Europe and the former Soviet Union anticipate several decades to clean up the extensive environmental contamination, especially the toxic, soluble, mobile and bio-available radionuclide and heavy metal pollution load caused by acidic leachates. Australia's environment must not be subject to this world's worst industrial practice.

## Environment - Failure to rehabilitate, Threats to Groundwater, disposal of liquid waste

1) General Atomics display a serious lack of credibility as a potential mining license holder as no rehabilitation of groundwater is planned despite the long held legal obligation to undertake such procedures in the US. A minimum mining standard is the protection of, and rehabilitation to, the pre-mining composition and quality of all potentially affected groundwater bodies.
2) The geographic course of the Beverley uranium ore bearing aquifer is not known to the proponent some 500 m north or south of the ore zone, and can not be considered to be isolated from other aquifers including the Great Artesian Basin (GAB) that flows to springs in the region. The dEIS presents no credible assessment of the possible impact on other aquifers including the GAB in spite of the intention for ISL to deliberately contaminate groundwater, the precautionary principle demands these operations do not go ahead.
3) As with the current trial mine the commercial mine proposes to discharge all of its liquid waste: sulphuric acid, radionuclides, heavy metals, and saturated solutions used in extraction of uranium, back into the Beverley aquifer. This is criminal negligence and must be prevented.

## Summary of Recommendations:

To be credible the EIS must include a life cycle assessment of uranium in terms of Ecologically Sustainable Development principles, that would preclude uranium development as it compromises the needs of future generations. Due process must be extended to the traditional owners. Sulphuric acid ISL is an unacceptable technology, intended waste disposal and failure to plan rehabilitation further exposes General Atomics as irresponsible and inadequate as a potential license holder. In the public interest this uranium mine application must be rejected and the trial mine facility removed and rehabilitated.

**Name .....Signed.....**
**Address.....Postcode.....**