

SUMMARY OF PUBLIC SUBMISSIONS

The EPA Chief Executive Dr Paul Vogel has determined to issue a licence, under the Radiation Protection and Control Act (1982), to Southern Cross Resources for commercial uranium mining operations at its Honeymoon site. Southern Cross Resources is a subsidiary of SXR Uranium One Inc.

The process to determine whether a licence should be granted, and the conditions to be attached to that licence, included a public consultation process. Whilst it was not a regulatory requirement, the EPA Chief Executive asked for public submissions on the Honeymoon licence application. The Southern Cross Resources application documents were made available via the EPA web site and the public were invited to make submissions. The EPA announced the process with a media release and a Public Notice in *The Advertiser*. The public submission period was four weeks, ending on 30 June 2006.

A total of 161 submissions were received. Fifteen submissions were received after the closing date, and these were included in this review. 46 unique or original submissions were received from individuals and organisations. 115 submissions were made via a form letter and were considered collectively.

The EPA summarised the submissions and submitted them to the Radiation Protection Committee for consideration. The Committee took the submissions into account when formulating its advice to the Chief Executive.

The most common issues raised were related to:

- Potential for groundwater contamination and the potential for those contaminants to move along the aquifer or escape into adjacent or overlying aquifers.
- Government policy on uranium mining.
- Nuclear fuel cycle.
- Regulation of uranium mining.
- Recommendations of the 2003 Federal Senate Select Committee inquiry into uranium mining.

The summary of public comments in this publication was compiled by the EPA. Many issues were raised in the 161 submissions and where they are identical or similar, they appear in summary form with a single response.

DOCUMENTS REFERENCED IN SUMMARY

Many submissions and responses refer to documents related to reviews or inquiries conducted into uranium mining, or related documents. These are described below.

CSIRO REPORT:

In 2002, the South Australian Government requested that the EPA conduct an independent *Review of the Environmental Impacts of the Acid ISL Uranium Mining Process*. The EPA commissioned CSIRO Land and Water to conduct the Review. The ISL Review considered the Beverley and proposed Honeymoon mines. The ISL Review involved a public consultation process and also considered those recommendations of the Senate Inquiry that are relevant to ISL mining in South Australia.

Published in 2004, the CSIRO review Report concluded that overall, the process of ISL mining of uranium has considerably less environmental impact than other conventional mining techniques. It recommended that acid ISL mining of uranium and re-injection of liquid wastes into the aquifer be allowed to continue, subject to monitoring showing that there are no excursions of leach solution or waste liquids into other aquifers. Other recommendations were made, mainly relating to additional monitoring. All recommendations were accepted by government and are being implemented.

[This document can be found at www.epa.sa.gov.au/pdfs/isl_review.pdf]

SENATE INQUIRY

The Federal Senate Select Committee Inquiry, 'Regulating the Ranger, Jabiluka, Beverley and Honeymoon Uranium Mines', presented its report in October 2003. The Report made 25 recommendations, 10 of which related to the Beverley and Honeymoon ISL Projects.

[This document can be found at www.aph.gov.au/senate/committee/ecita_ctte/completed_inquiries/2002-04/uranium/report/report.pdf]

BACHMANN PROCEDURES

In February 2003, the EPA implemented recommendations arising from the independent 'Bachmann' review and applied new incident reporting and recording procedures to uranium mining operations in South Australia.

The procedures apply to incidents involving unplanned release of radioactive process materials, radioactive liquids or radioactive wastes associated with the physical and chemical processing of uranium ores.

The procedures are applied by the EPA as part of the Radiation Management Plan for uranium mining operations (a condition of the RPC Act license to mine or mill radioactive ores). The aim of the procedures is to ensure compliance with conditions of license and to ensure radiation exposures to workers, members of the public and the environment, are as low as reasonably achievable.

HONEYMOON EIS:

The Honeymoon Uranium Project was subject to a joint environmental impact assessment process by the Commonwealth and South Australian Governments.

Southern Cross Resources prepared an Environmental Impact Statement (EIS) and this was released for public and government comment in June 2000. It completed a Response Document, and this was released in November 2000. Further information requested by the Commonwealth was provided in July 2001.

Commonwealth and South Australian Governments approved the EIS and Response Document in November 2001. The South Australian Government granted a Mining Lease in December 2001, and the Commonwealth Government granted a uranium export permit in January 2002.

[This document can be found at http://www.epa.sa.gov.au/pdfs/honeymoon_eis.pdf]

CODE OF PRACTICE ON RADIATION PROTECTION AND RADIOACTIVE WASTE MANAGEMENT IN MINING AND MINERAL PROCESSING (2005):

This Commonwealth Code of Practice is applied as the primary condition on licences issued under the RPC Act, to mine or mill radioactive ores. The 'Mining Code' requires the operator to detail how workers, members of the public and the environment will be protected from harmful effects of radiation exposures arising from mining and mineral processing and from the waste resulting from these activities, both now and in the future. The Mining Code requires the operator to seek formal approval for the radiation safety and waste management aspects of the operation and for the implementation of the appropriate programs.

[This document can be found at www.arpansa.gov.au/pubs/rps/rps9.pdf]

RADIATION PROTECTION AND CONTROL (TRANSPORT OF RADIOACTIVE SUBSTANCES) REGULATIONS 2003.

The transport of radioactive substances in South Australia must be in accordance with the Transport Regulations. The Regulations adopt the national Code of Practice on the Safe Transport of Radioactive Material (2001).

[These Regulations can be found at www.epa.sa.gov.au/pdfs/reg_radiation_transport.pdf]

CODE OF PRACTICE FOR THE NEAR SURFACE DISPOSAL OF RADIOACTIVE WASTE IN AUSTRALIA

This Code of Practice provides the basis for the near-surface disposal of solid radioactive wastes, although is not intended to apply to the specific wastes covered by the Mining Code (above). In South Australia, some categories of solid waste on mine sites are disposed of in facilities that are consistent with the design outlined in this Code.

[This Code can be found at www.arpansa.gov.au/pubs/rhs/rhs35.pdf]

ISSUE	SUBMISSION	RESPONSE
<p>ACID ISL METHOD</p>	<p>A number of submissions argued that the Acid ISL mining technique is illegal in developed countries, has only been used in third world and developing countries with the lowest environmental protection standards, and safer mining methods should be considered.</p> <p>An example raised in many submissions was the legacy of groundwater and surface contamination following use of acid ISL in Eastern Europe by the former Soviet Union.</p> <p>Submissions noted a number of reported leaks and accidents associated with Acid ISL mining at Beverley and questioned whether a similarly designed mine will not have a similar record of reported incidents.</p> <p>The Joint Technical Submission made to the ISL Review by the Australian Conservation Foundation, Friends of the Earth Australian and the Conservation Council of South Australia was submitted to the EPA as part of the current consultation process.</p>	<p>The acid ISL method is not appropriate in some geological locations for technical or environmental reasons, however the EPA is not aware of any country where it is illegal. The CSIRO Report notes (Section 10.1) the naturally high levels of salt and radionuclides make the Honeymoon aquifer unsuitable for human and stock use, and the groundwaters are unlikely to have any beneficial use other than mineral processing.</p> <p>The CSIRO Report noted in Section 10.8 that Acid ISL mining in South Australia is more environmentally responsible than any alternative methods. Open cut and underground mining methods result in more disturbance of surface vegetation and result in larger volumes of surface wastes.</p> <p>Alkaline and acid ISL methods have been tested at the Australian uranium mine site locations. The alkaline method swells clays in the sands ruling out its use, and acid leaching is the most appropriate technique for Australian conditions.</p> <p>The CSIRO Report (Section 10.8) found that the Beverley mine has initiated and implemented worlds best practice ISL methods. The Honeymoon mine will be expected to achieve the same standard of operation. The EPA does not consider the former Soviet Union mining practices are representative of the use of this technique in Australia.</p> <p>As a result of a number of spills in the early stages of the Beverley mine, the Government initiated a review of incident reporting procedures for uranium mines in South Australia. This resulted in the implementation of detailed incident reporting procedures (known as the Bachmann Procedures) for all uranium mines.</p> <p>These procedures subject uranium mines in South Australia to a strict incident reporting regime. All incidents, including the smallest spills, are required to be reported to the authorities and published on the operators' web sites.</p> <p>The EPA reviewed this document. The issues raised were considered during the ISL Review and have already been addressed in the CSIRO Report and hence were not re-assessed as part of this process.</p>

ISSUE	SUBMISSION	RESPONSE
	<p>Submissions stated that the Acid ISL mining process results in highly toxic, acidic and radioactive wastes, and heavy metals being left in solution in the groundwater in a mobile form at the end of the process. The plume of discharged liquid mine wastes could then be expected to move in the open ended and connected aquifer system out of the mine lease area over time.</p> <p>As a result, there will be a risk of contamination of adjacent aquifers or surface water. The environment will be inadequately protected from the effects of the process.</p>	<p>Section 2.4 of the CSIRO Report states Acid leaching does result in greater dissolution of gangue minerals, but the migration of dissolved ions is limited by the eventual natural neutralisation of the acid, and by other natural attenuation processes*. (It notes that alkaline leaching introduces fewer ions into solution, however dissolved ions can migrate for long distances in the alkaline media if restoration processes are not applied).</p> <p>Section 10.3 of the CSIRO Report notes that overseas operations show natural attenuation will occur with eventual return to pre-mining conditions. The timeframe is likely to be of the order of 20 years (CSIRO Report Section 2.6.3).</p> <p>The groundwater is naturally highly saline and contains high concentrations of radionuclides making the water unsuitable for human or stock use. In its untreated form, the only use identified for the groundwater at Honeymoon is mining. (CSIRO Report Section 10.1) During the Acid ISL mining process, extracted radionuclides and heavy metals are returned to their point of origin in the Basal Sands.</p> <p>The Honeymoon Mine site is not contained within the area of the Great Artesian Basin. It has been demonstrated to the satisfaction of State and Commonwealth government that there is no likelihood of any effect on the GAB (Lake Frome region) from the Honeymoon project. (EIS Assessment Report, page 57)</p> <p>The Upper and Middle Sands are separated from the Basal Sands mining zone by low permeability clays and can be adequately protected via the operational monitoring and recovery methods proposed. (EIS Assessment Report, page 66).</p> <p>The operator is required to have an extensive regime of monitoring wells to track the movement of mining fluids. The results from the monitoring wells are reported to the authorities on a regular basis. It is a requirement for the operator to have contingency plans to prevent movement of fluids beyond the mining area should the monitoring identify a so-called 'excursion'. The EIS Assessment and CSIRO Report confirm that proposed monitoring would adequately protect the aquifers. (EIS Assessment report Section 5.3.3)</p> <p>Recommendation 1. of the CSIRO Report states that the mining and disposal methods should continue without major changes.</p>

*** NATURAL ATTENUATION**

Natural Attenuation is the term given to the process where groundwater, which has been altered through the addition of leach solution or liquid waste, reverts through reaction to its surrounding aquifer matrix and pre-existing groundwater over a period of time to, or towards, its pre-contaminated state, without additional attenuating treatment. (Section 4.6 of the ISL Review)

ISSUE	SUBMISSION	RESPONSE
<p>Groundwater Contamination</p>	<p>Submissions noted that the mining operation involves drilling through overlying aquifers to access the mining zone. There was concern that mechanical failure of the well castings would result in leakage into the overlying aquifers</p> <p>Concern was expressed that leakage could occur through permeable sections of the clay layers separating the mining zone from the overlying aquifers</p> <p>Submissions suggested mobilisation of heavy metals and radionuclides in the mining aquifer will contaminate the Yarramba palaeochannel, Lake Frome and the Great Artesian Basin</p> <p>Submissions noted the reported excursion of mining fluid into an overlying aquifer during trial operations and that this indicates the possibility of further excursions during commercial operations</p>	<p>Wells are drilled into the deposit and lined with a watertight casing to maintain the integrity of the upper two aquifers in accordance with the South Australian Water Resources Regulations.</p> <p>The Upper and Middle Sands are separated from the Basal Sands mining zone by low permeability clays and can be adequately protected via the operational monitoring and recovery methods proposed. (EIS Assessment Report, page 66) Rec 1 Point 3 of the Environment Australia EIS Assessment report (Pg 40) states that the injection of a liquid waste stream must occur only in "hydrologically acceptable areas" where both the middle clay and the Ackeringa palaeosol have a satisfactory areal extent and thickness. SXR will be required to inject waste only where both the middle clay and the Ackeringa palaeosol have a satisfactory areal extent and thickness. SXR will be required to implement monitoring of groundwater and develop contingency plans to retain mining and waste fluids in the mining zone as part of the Radioactive Waste Management Plan.</p> <p>EIS Ch 6.4.3 states that groundwater movement of 10 - 16m/year implies it would take 4000 - 6000 years to travel 60km length of the Yarramba channel to Lake Frome. Section 10.3 of the CSIRO Report notes that overseas operations show natural attenuation will occur with eventual return to pre-mining conditions. The timeframe is likely to be in the order of 20 years (CSIRO Report Section 2.6.3). It has been demonstrated to the satisfaction of State and Commonwealth governments that there is no likelihood of any effect on the GAB (Lake Frome region) from the Honeymoon project. (EIS Assessment report page 57) Under normal mining condition overproduction prevents excursions of mining solution from the wellfield.</p> <p>A reduction in pH was observed in a Middle Sand Monitor Well (H165) during injection trials. The EIS Assessment Report found that modification of mining operations resulted in a return to baseline conditions and noted that SXR must exercise caution during mining operations. (EIS Assessment, Page 62) SXR will be required to implement monitoring of groundwater and develop contingency plans as part of the Radioactive Waste Management Plan, to retain mining and waste fluids within the mining zone</p>

ISSUE	SUBMISSION	RESPONSE
	<p>Submissions claimed numerous excursions of radioactive solution at Beverley indicate the possibility of further excursions during commercial operations at Honeymoon.</p> <p>Several submissions noted there is a lack of empirical evidence by the proponent for claimed 'natural attenuation' of discharged wastes.</p>	<p>An excursion of mining fluid (elevated sulphate) was reported at the Beverley mine in 2004, although this was later suspected to be a natural variation in water chemistry. Contingency plans were in place to rectify excursions of mining fluid. SXR will be required to implement a monitoring and contingency plan that is as robust as that for the Beverley mine.</p> <p>The CSIRO Report made a number of recommendations related to groundwater monitoring with the aim of more accurately measuring the rate and extent at which the groundwater reverts to pre-mining conditions. SXR will be required to implement all of the recommendations of the CSIRO Report.</p>
<p>Aquifer Rehabilitation</p>	<p>There were several submissions arguing that there was no guarantee that the mine site and aquifer would be rehabilitated at the end of its life.</p> <p>In particular, it was argued that the disposal of liquid mine wastes by discharge to the mining aquifer, without rehabilitation, will result in an unacceptable risk to groundwater.</p>	<p>There is a clear requirement under the RPC Act licence conditions (<i>Code of Practice on Radiation Protection and Radioactive Waste Management in Mining and Mineral Processing 2005</i>) and also under the Mining Act, for SXR to rehabilitate the surface area of the mine site. That requirement may be extended to the rehabilitation of the mining aquifer itself, should the EPA decide there is evidence of an unacceptable risk to people or the environment.</p> <p>CSIRO Report Rec 1 concluded that the acid ISL mining at Honeymoon and associated waste disposal should be "allowed to continue without major changes".</p> <p>The CSIRO Report (Section 10.1) noted that the sole use identified for aquifers at Honeymoon is mining, due to the high levels of naturally occurring salts and radionuclides. Radionuclides and any heavy metals extracted during the mining process are returned to their point of origin in the Basal Sands.</p> <p>Because there is no human or stock use for the aquifer there is no proposed rehabilitation for the mining aquifer. (See CSIRO Report Section 10.1) Section 10.3 of the CSIRO Report notes that overseas operations show natural attenuation will occur with eventual return to pre-mining conditions. The timeframe is likely to be in the order of 20 years (CSIRO Report section 2.6.3).</p> <p>SXR will be required to implement monitoring of groundwater and develop contingency plans as part of the Radioactive Waste Management Plan, to retain fluids in the mining zone. Recommendations 4, 5, 7 and 8 of the CSIRO Report propose studies to determine the rate and extent of natural attenuation. Recommendation 9 of the CSIRO Report proposes chemical amendments should be investigated, if after monitoring, natural attenuation processes appear to be slow or non-existent.</p>

ISSUE	SUBMISSION	RESPONSE
		If required, the EPA will extend the period for post mining aquifer monitoring to assess the rate and extent of natural attenuation and the need for remediation.
Nuclear Power and the Nuclear Fuel Cycle	There were many submissions questioning uranium mining's role in the nuclear fuel cycle, the viability of nuclear power and associated waste disposal options. Submissions also suggested that nuclear power was not an answer to global warming, and that alternative renewable power options should be pursued.	The nuclear fuel cycle and its relation to alternative energy sources was outside the scope of the EPA assessment.
Environmental Impacts	<p>Submissions noted potential environmental impacts:</p> <p>Loss of groundwater to mound springs resulting in severe impact on the surrounding wildlife</p> <p>The inability of fencing to stop smaller mammals, marsupials, reptiles or birds from entering the area and becoming radioactive.</p> <p>Unacceptable risk to the wider environment and future generations of radioactive contamination arising from the operations</p>	<p>No mound springs are located in the vicinity of the Honeymoon Project. As noted in the response above, the Honeymoon mine is not located near the Great Artesian Basin (GAB), which is the source of mound springs found elsewhere in South Australia.</p> <p>The impacts of mining activities on fauna were addressed in EIS and are considered as part of the EPA assessment. The operators are expected to take all reasonable precautions to prevent access of fauna to the Plant, ponds and wellfield areas.</p> <p>The EPA as part of its assessment has considered the EIS, CSIRO report, SXR application in determining whether the radiological risks to the community, environment and future generations is acceptable. The outline of plans for managing the process and the wastes produced are considered acceptable. The operator will be required to provide more detailed plans prior to construction and operation.</p>
Surface Spills	There were a number of comments on surface spills reported at the Beverley Project, and during the Honeymoon Field Leach Trial.	The management of leaks, contamination checks and monitoring form part of the licensing regime that is imposed on the mine operators. The likelihood and consequence of movement and spills of mining fluids, including the EPA's experience regulating the Beverley uranium mine, has been considered as part of the EPA assessment. The operator will be required to clean up all spills of radioactive fluid under the EPA licence.

ISSUE	SUBMISSION	RESPONSE
<p>Seismic Issues</p>	<p>A submission recommended that the earthquake hazard for the Honeymoon region and level of risk be reassessed and that the standard used for the seismic assessment is not appropriate for mines. The submission also noted that was an error in the EIS in values derived from the acceleration coefficient.</p>	<p>The incorrect units were used in the EIS in deriving values from the acceleration coefficient. The submission raises important issues that are outside the normal scope of the Radiation Protection and Control Act. The issues will be addressed by the EPA in consultation with other agencies, in authorising the construction of the plant and wellfield.</p>
<p>Regulatory Standards</p>	<p>Several submissions questioned the applicability and enforcement of various codes of practice applied to the Honeymoon Project.</p> <p>Uncertainty was expressed in relation to the level of routine operational reporting to the EPA, and the level of public reporting of incidents.</p> <p>There was uncertainty concerning the current licence held for the Honeymoon Project under the RPC Act.</p> <p>Submissions noted a conflict between the RPC Act and other state legislation in relation to disposal of liquid mine waste into the mining aquifer.</p>	<p>The primary Licence condition is compliance with the Commonwealth <i>Code of Practice on Radiation Protection and Radioactive Waste Management in Mining and Mineral Processing (2005)</i>. The Commonwealth published this revised Code to foster uniform high standards of radiation protection and radioactive waste management in mining and mineral processing throughout Australia.</p> <p>Other Codes of Practice may be used as appropriate or as a framework for regulation and a risk based approach is taken in applying those codes. All appropriate codes of practice will be applied to the Honeymoon Project. In general the uranium mining industry is subject to more regulation than other extractive industries.</p> <p>The EPA has ongoing regulatory oversight of uranium mining operations. Formal meetings, mandated reports from the operator and scheduled audits form part of this oversight. EPA Authorised Officers monitor operations on an ongoing basis and have the authority to inspect mine sites and act on information at any time.</p> <p>There is an established protocol for reporting incidents to the regulator. These are referred to as the 'Bachmann' reporting procedures. Incidents defined as 'Reportable' are required to be reported to the regulator within 24 hours. They are also published by the mine operator on its web site.</p> <p>SXR retains a licence issued under the RPC Act for the Honeymoon Field Leach Trial operations. Following the end of the trial, the licence conditions were changed to ensure continuation of monitoring programs and to prevent extraction of uranium from the ore zone. This new licence application is to permit commercial operations at the site.</p> <p>The licence application has been assessed solely under the requirements of the RPC Act. The EPA will separately ensure compliance with other legislation that it is responsible for, including the <i>Environment Protection Act 1993</i>.</p>

ISSUE	SUBMISSION	RESPONSE
Government Policy	Submissions commented on government policy issues and stated that an approval of the Honeymoon mine was a breach of State and National ALP policy commitments. It was also suggested that there were conflicts between the approval of the Honeymoon mine and the National Waste Repository.	This licence application has been considered in relation to the requirements of the RPC Act. Government policy is a matter for government.
Solid Waste	<p>Submissions raised technical concerns relating to the management of solid radioactive wastes, such as cruds.</p> <p>Submissions raised questions concerning the location and specifications for the solid radioactive waste disposal pits and the purpose of the leak detection system.</p> <p>Concern was expressed about the creation of a Tailings Dam at the Honeymoon site.</p> <p>General issues were raised relating to technical details of the draft Radioactive Waste Management Plan and the fundamental physical behaviour of radioactive material</p>	<p>Waste management practices and the location of the solid radioactive waste pits will be subject to further authorisation in accordance with the licence conditions.</p> <p>The construction of the solid radioactive waste facilities will be consistent with the requirements of the <i>Code of Practice for the Near Surface Disposal of Radioactive Waste in Australia</i>, and in accordance with the characteristics of the radioactive waste to be contained. Solid radioactive waste will be covered with a minimum of 2 meters of cover as described in the draft Radioactive Waste Management Plan and the disposal sites will require monitoring by the operators to confirm they are operating as designed.</p> <p>SXR have not proposed construction of a tailings dam.</p> <p>The Draft Radioactive Waste Management Plan (RWMP) proposes appropriate systems and facilities. The draft RWMP demonstrates a sound understanding of the behaviour of radioactive material. Some of the issues raised are possibly due to misunderstanding of the proposal. The EPA is happy to further discuss submissions with the individuals once they have had an opportunity to review this EPA response</p>
Independence of the CSIRO	<p>The independence of the CSIRO Report was questioned, suggesting that the CSIRO was reliant on funding from bodies that are set to profit from uranium mining ventures.</p> <p>Submissions quoted the CSIRO Report as recommending a new public environmental approval processes.</p>	<p>The Commonwealth Government funds the CSIRO and its advice in this matter is considered independent and impartial.</p> <p>The matter of a public environmental approval process was not a recommendation of the CSIRO Report but rather a comment raised during the public consultation exercise, which formed part of the ISL Review.</p>

ISSUE	SUBMISSION	RESPONSE
Economic Considerations	Submissions argued that the economic benefit to the State of approving the Honeymoon mine is outweighed by the environmental impacts and that a referendum should be held in relation to mining at Honeymoon.	The EPA endeavours to ensure that the economic progress of the State is not at the expense of unacceptable environmental impact. The assessment process, and the subsequent regulation and monitoring regime, are designed to protect the environment from unacceptable impact.
Adequacy of Public Comment Processes	Several submissions indicated the public consultation process was not adequate for a thorough evaluation of the licence application documents.	<p>The current licence application assessment process is to determine whether the proposal satisfies the requirements of the Radiation Protection and Control Act and associated Regulations and whether workers, the public and the environment are adequately protected from the radiological hazards of the proposed project. Public submissions are not a formal part of that process, however the EPA Chief Executive considered that such submissions would add value to the decision making process, as well as making the process more open. The Radiation Protection Committee and the EPA Chief Executive have been informed by the submissions when forming their advice and decision.</p> <p>The public have previously had opportunities to comment during the EIS Assessment, Senate Inquiry and CSIRO Report processes.</p>
Transport	Submissions expressed concerns regarding safety of transport of uranium product	Transportation of mined uranium is regulated by the EPA under the Radiation Protection and Control (Transport of Radioactive Substances) Regulations 2003. These regulations are based on international standards. Transportation was addressed by the EIS (Sections 10.7 and 11.4) and was determined by State and Commonwealth governments to not pose a significant risk to the public or environment. (EIS Assessment Report Section 5.4)
Native Title	Submissions stated the Adnyamathanha traditional owners are opposed to the Honeymoon mine and have not been adequately consulted. It was further claimed that the mining agreement has been allowed to override the Lands Rights Act	<p>The Adnyamathanha Traditional owners have not made a submission to the EPA on the licence application.</p> <p>Native title issues were not considered as part of the application for a licence under the RPC Act.</p>
Senate Inquiry	Submissions were made that argued the recommendations of the 2003 Senate Select Committee Inquiry on Uranium Mining should be adopted in South Australia and applied to all uranium mines	The CSIRO Report, Bachmann reporting requirements, the EIS and relevant legislation, have dealt with all recommendations of the Senate Select Committee Inquiry relevant to South Australia.