

## **Submission**

### **Objection to Bowdens Silver SSD 5765**

**I am a resident of the Mudgee region, and I object to this project. The EIS is flawed as it does not address known major issues of this type of project; neither does it address community and government concerns raised and identified within its own pages.**

**The project should not be approved.**

#### **Flaws within the EIS**

##### **1. Lack of recognition of acid mine drainage (AMD):**

The reality of AMD associated with mines such as this is well known globally; yet there is no discussion of this matter in the EIS. Bowdens have included AMD listed as a matter of concern revealed in consultation (p 3-30), and then ignored this critical aspect of their project. It is not discussed or assessed in any way.

The word 'seepage' is used 32 times in contexts where it would be expected that AMD be addressed. The significance of seepage is downplayed and the nature and risk of the seepage is not discussed.

Leachate from the Waste Rock Emplacement is referred to, but its significance and the nature of the risk from this potential acid forming material is not fully revealed or discussed. There is no known remediation of tailings dams and waste rock emplacements and they remain in place forever - that is, until they leak, seep or create leachate, or collapse. Recent events around the world highlight the catastrophic risks of AMD, and the environmental, physical, social and economic havoc that is imposed on regions that allow these structures.

The potential for acid drainage and/or tailings dam collapse is not addressed. The impact of AMD over the long term and into the future is not addressed.

This lack within the EIS is not acceptable.

##### **2. Lack of assessment of water pipeline**

This project is contingent upon additional water to be sourced from mines approximately 58.5km distant – Ulan and/or Moolarben. There is no agreement as yet with either of these mines. The planning and consultation has been deferred to a consultant.

There is no assessment of this proposed pipeline, yet there are many impacts that require investigation. Some are listed here:

- The source mines are in the headwaters of the Goulburn River. The excess water they have at any time is required for environmental flows into the East flowing Goulburn. It should not be transferred to a West flowing catchment.
- 'The pipeline would intersect a number of constructed infrastructure and natural watercourses' (p 2-67).

- The easement is expected to be 10m wide. It traverses privately-owned, freehold land, public formed or unformed road reserves or Crown land. Much of this land is natural vegetation or agricultural land.

This lack within the EIS is not acceptable.

### **3. Lack of assessment of ore transport routes**

Bowdens intend to transport the ore in shipping containers on B-double trucks using regional roads, including through the middle of Mudgee town and past local schools. All trucks will use the narrow and winding Lue Road to get to Mudgee. The impact of this has not been assessed.

Transport of such vehicles through the town and past schools is not acceptable. The noise, dust, vibration and traffic congestion is unacceptable.

This lack within the EIS is not acceptable.

### **Objections**

1. The void of the mine will not be filled when mining is finished. Estimates indicate there will be a hole approximately 1.5km wide by 300 meters deep and a health risk to the surrounding environment forever.
2. The tailings dam will cover 117 hectares with a 56m high wall and contain cyanide, cadmium, arsenic, zinc and lead. There will be no secondary wall, and the dam will be less than 1km from Lawson Creek. Lawson Creek joins the Cudgegong at Mudgee, and flows on to join the Macquarie at Burrendong Dam.
3. Lead dust - there is no safe limit for lead exposure. The risks of health effects are highest in unborn babies, infants and children. Lue Primary School is less than 2km from the mine site.
4. The project will destroy 381.7 ha of native vegetation including 182.3 ha of the critically endangered Box-Gum Woodland. This ecological community provides habitat for a large number of endangered species listed under NSW and Federal environmental legislation. Koalas have been sited beside the project site.
5. The project proposes to destroy 25 sites that are considered to have high cultural significance by the local Aboriginal community. This disrespect of cultural heritage is shameful.
6. There is overuse of 'monitoring and management' in the EIS. It is proposed to monitor and then manage many of the impacts identified. Once a negative impact has been identified through monitoring – it is too late, damage has already occurred. The management to follow can only produce a less than ideal result.

The EIS for this project is inadequate. It is flawed and does not address community concerns. I ask that this project application be refused.

Sincerely,



Rosemary Hadaway

27/07/2020