

REX CHRISTOPHER PLUMMER
99 LOUEE STREET,
RYLSTONE, NSW 2849
28 March 2022

The Director,
Resource Assessments,
Planning and Assessment,
DPIE,
Locked Bag 5022,
Parramatta,
NSW 2124

Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
2025 FEDERAL GOVERNMENT PM 2.5 STANDARD

I **object** to this proposal (SSD 5765).

I declare that I **have not made any Donations or Gifts** to any political party or personnel in the last two years.

Bowdens have not offered nor discussed the proposed changes to Federal Government emission standards. In 2025 they are to change with a reduction to PM 2.5 levels.

Currently all Bowdens can propose for dust suppression is water carts or more water carts! It is a very primitive response particularly when the un-waterable TSF is wind eroding at many tonnes per year. The new proposal (2022) to use chemical suppressants as it will alter the nature of the emitted dust.

If Bowdens don't volunteer compliance and demonstrate enforceable techniques etc then DPIE should reject the entire proposal.

Yours sincerely,



R C Plummer

REX CHRISTOPHER PLUMMER
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RYLSTONE, NSW 2849
31 March 2022

The Director,
Resource Assessments,
Planning and Assessment,
DPIE,
Locked Bag 5022,
Parramatta,
NSW 2124

Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
SUBMISSIONS REPORT : ANALYSIS OF SUBMISSIONS

I **object** to this proposal (SSD 5765).

I declare that I **have not made any Donations or Gifts** to any political party or personnel in the last two years.

Without a doubt the number of submissions received by DPIE in support for the mine proposal is greater than those against. This is little more than a 'show of hands'. Two main reasons are behind the numbers. Bowdens (SVL) mailed voting/comment forms and reply paid envelopes to all non-corporate shareholders (there are a few SMSF companies who were included). The profit incentive produced a high proportion of supporters. Many of the originating addresses are from interstate and urban areas.

The pre-printed forms issued by the Company (SVL) offer the 'supporter' 11 lines to provide their reason for support. The original forms are with some difficulty accessible for viewing on the DPIE web portal. Inspection of many of the responses indicates that typical comments are of very few words and of a very general nature mostly centred around the potential project's providing of employment and wealth.

Few people could argue, including myself and I would guess all of the other opposition contributors, that wealth creation and full employment are not great ideals, they are it would be wonderful to have a great wealth and employment generator. But we would also assert that it should not be created at the expense of human health, environmental degradation and harming the continuing viability of existing businesses. For these reasons it is clear that those opposing the project have taken its impacts seriously and studied and questioned the data and prepared lengthy analytical letters of objection and question. Very few objection letters are as short as 11 lines.

Where are the lengthy analytical reports from the many faceless supporters of the proposed project? Short 'employment-related' words on a printed form are meaningless and need to be treated accordingly by DPIE.

My submission, for example covered a number of subjects which were and still are pertinent and were derived from the original Bowdens submission on exhibition. To the best of my reading I cannot find a reference to any of my quoted items. Firstly that demonstrates that Bowdens were very selective in responses and therefore hugely biased in what they reacted to and secondly that the Submissions Report needs to be re-written to provide responses to ALL submissions.

At the beginning of the Submissions Report Bowdens attempts to analyse the statistics. It's curious that of the very large number of form-filled support letters they cover a mere 16 subjects. The objectors letters though (including my letter) cover about 46 subject areas. Would DPIE be prepared to swap the subject headings and get the project supporters to make the same positive comments about water table impact, dust emissions and noise intrusion? Possibly not!

'The Department's assessment focuses on the issues, and we ask the proponent to respond to the issues rather than to individual submitters.'

Bowdens' reporting of the submissions is shallow and self-serving and DPIE needs to reject it or have them modify it to a realistic response. Their cherry-picking has given a further biased report; it must be rejected.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chi' with a stylized flourish underneath.

R C Plummer

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NSW 2124

Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
**APPENDIX 2: UPDATED SUMMARY OF ENVIRONMENTAL MANAGEMENT AND MONITORING
MEASURES**

I **object** to this proposal (SSD 5765).

I declare that I **have not made any Donations or Gifts** to any political party or personnel in the last two years.

This is a very weak document and is more subjective than quantitative. All issues listed are in the control of the opinion of Bowdens. The quantitative measures are known and have been identified in the EIS; now Bowdens has taken the defined numeric standards and replaced them with descriptive prose! This is not acceptable and must be rejected.

The matters raised need to be shown in comparison with those which they supersede. They are not and this kind of obfuscation by Bowdens should not be accepted. DPIE should reject the application to Amend the proposal.

Not only is this very sneaky of Bowdens to attempt to weaken their compliance regime in an APPENDIX to an AMENDMENT for a development application it is surely contrary to all that the SSD and DPIE processes stand for.

Finally to add insult to injury Bowdens proposed new compliance standards are weakened by their wording. Of any action proposed many are qualified by words such as "...where practical" or "...acceptable...quality" and "...where feasible". This is a cop out and these unsubstantiated excuses keep being proposed leaving DPIE without a leg to stand on a future environmental dispute.

This dodgy language has to stop before it gets out of hand. The proposal has to be unconditional....if it were to be approved. Moving goalposts is not fair.

Please reject the Bowdens application in its entirety.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chi' with a small horizontal stroke underneath.

R C Plummer

REX CHRISTOPHER PLUMMER
99 LOUEE STREET,
RYLSTONE, NSW 2849
30 March 2022

The Director,
Resource Assessments,
Planning and Assessment,
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Locked Bag 5022,
Parramatta,
NSW 2124

Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
TOPSOIL STORAGE, MANAGEMENT AND REUSE

I **object** to this proposal (SSD 5765).

I declare that I **have not made any Donations or Gifts** to any political party or personnel in the last two years.

Bowdens have indicated an area in the catchment above the sludge dam (TSF) to be a store for topsoil. Unless placed and managed properly for the mine life this is a waste of time. Some of it will be expected to be there and available for rehabilitation works. It's not very practical, 20 years of storage of a living being without constant care is a big ask.

As shown the piles of dirt cross drainage lines thereby trapping water and resulting in water-logged anaerobic soil. Stinking brown muck effectively.

Every time the piles are touched (moved or crossed) their structure degrades by, largely, compaction. Thereby oxygen and moisture access is reduced and the existing balance of micro 'biota' reduces and dies; these living characteristics are what make topsoil what it is, special and desirable.

Depending on the soil composition the height of the piles needs to be limited. More cohesive soils allow less air and water penetration so their height limit will be much lower than, say, a granular soil. The area needs to be drained and fenced and managed ecologically. Bowdens simply use a 2 metre height.

Bowdens clearly think they are scoring points by saving soil. Unless done correctly they will end up with a pile of dead brown granular material. Bowdens has not offered any discussion on topsoil management. Had Bowdens consulted and complied with the 2007 NSW Minerals Council document we may have been looking at a better proposal.

In 16 or 17 years forests can grow on this dirt; Bowdens make no mention of its management.

Bowdens demonstrate by this lack of care and knowledge that it is yet another metaphor for their mismanagement and accordingly the project needs to be rejected.

Yours sincerely,

R C Plummer

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Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
TSF DUST GENERATION

I **object** to this proposal (SSD 5765).

I declare that I **have not made any Donations or Gifts** to any political party or personnel in the last two years.

At EIS 2.8.2.1 Bowden state their TSF design objectives. There is no intention to eliminate and control dust. Why not? The rhetoric is easily answeredthey CAN'T.

Bowdens proposal is to put ore through (in series) three types of grinder to pulverise the rock to a fine powder. After flotation and separation and collection of mineral concentrates that powder with the addition of a number of other chemicals (now a slurry, is pumped to the TSF. The chemicals are mostly poisonous but fairly diluted but they are present and cannot be removed. They will remain in the TSF for ever.

Geotechnically the TSF is not stable. Equally graded particles do not compact and bond like say, roadbase, they remain in place simply by gravity. Therefore the fine dust that makes up the TSF is extremely prone to erosion, particularly wind erosion.

When parts of the TSF surface are dry enough they will form a crust. It is this crust of powder and chemicals which will be lifted and distributed by the wind. Bowdens estimates the wind erosion to lift and distribute up to 35 tonnes per year from the TSF surface and embankment. That is Bowdens figure so reality may produce a higher tonnage.

Furthermore although Bowdens claim that they will stabilise the surface dust with water. For most of the time the TSF will have the consistency if porridge. 50 metres deep of soggy porridge will not support the weight of a water truck. Also 250 acres of area is impossible to cover with sprinklers. It cannot be stabilised and dust production is

inevitable. The plan to now produce a 'paste' will alter the structural characteristics of the pond very little; still no water trucks.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'R C Plummer', with a stylized flourish at the end.

R C Plummer

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Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
M W R COUNCIL ROLE

I **object** to this proposal (SSD 5765).

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Bowdens in their amendment proposal see MWRC as equals with DPIE in the approval process, placing them adjacent in the narrative saying:

'Both the NSW Department of Planning Industry and Environment and Mid-Western Regional Council have been consulted with specific regard to the proposed amendment.'

This is inconsistent with the reference to their assertion in the Submissions Report (Clause 5.8.5). Bowdens attempt to back out of that concept. In the submissions response 5.8.5 Bowdens say:

'It should be noted that MWRC is not the consent Authority for the Project....'

But MWR Council is important to Bowdens; why? It's all about the MONEY.....5 MILLION DOLLARS of fees in the MWRC Planning Agreement (Table 2.1).. (\$4.7 million actually). Council wants the money; Bowdens is prepared to give it, for a consideration....APPROVAL OF THE MINE.

Submissions report Clause 5.8.5 makes further reference to MWRC thus:

5.8.5 Bowdens Silver's Employees

Representative Comment(s)

Is the rumor (sic) true that Bowdens employ a Mid-Western Council Member, as part of their Public Relations team? If this is correct would it not be a matter for the ICAC?

(Name Withheld) of Camboon, NSW (Submission SE-127656)

My daughter, who lives in Rylstone, is being intimidated by an employee of Bowdens who is also a local councillor and she may be forced to leave her home and the district.

(Name Withheld) of Lue, NSW (Submission SE-8758101)

Response

Bowdens Silver does employ a staff member who is also a Councillor with the Mid-Western Regional Council (MWRC). The role of all Councillors requires stringent regulations and actions around participation in Council matters and the declaration of interests. This indeed applies fully to this Councillor in terms of matters relating to the Bowdens Silver Project. The implication that merely because a staff member performs two particular roles that they are corrupt, is wrong and potentially defamatory.

It is to be noted that the MWRC is not the consent authority for the Project and therefore the input of a single councillor on assessment matters and the Project outcomes is negligible. Responsibility for decisions relating to the grant of Development Consent for the Project rests with the Independent Planning Commission with assessment and recommendations provided by the NSW Department of Planning, Industry and Environment.

Suggestions of intimidation by a Bowdens Silver employee are unsubstantiated and have never been raised with the Company. Discussions and interactions do occur between Bowdens Silver and members of the public who oppose the Project. It is important to note that expressing differing opinions do not mean intimidation.

..

We probably all know the Councillor to whom the above response refers. As claimed he works for Bowdens. There has been no public disclosure of his terms and conditions of employment. Why not? Clarity in those matters for public digestion should be the minimum. Why has it not been done nor required? DPIE must require publication. Incentive payments upon approval of the mine proposal may form an interesting clause.

Clearly, from the above, people in the community have concerns about the role of that Councillor. There is no reason to question the honesty of the residents' submissions and accordingly there is a fair case to heed the poor behaviour described in the above reports. The Councillor would appear to have been democratically elected and thus the community he serves does expect clarity and transparency in the position he has been awarded.

What particularly goes with the Council appointment are the concepts of responsibility and accountability. But those waters are now getting muddled. Is the Councillor responsible to his employer (Bowdens) OR is he responsible to the MWRC electorate? Possibly both..... and simultaneously.

DPIE should have regard to the Council's (and Councillors') roles as elected public officials and the possibility of conflicts of interest. DPIE should also seek an opinion from the Local Government Minister and even further, if needed, regarding these roles and responsibilities (real and apparent).

Yours sincerely,



R C Plummer

REX CHRISTOPHER PLUMMER
99 LOUEE STREET,
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3 April 2022

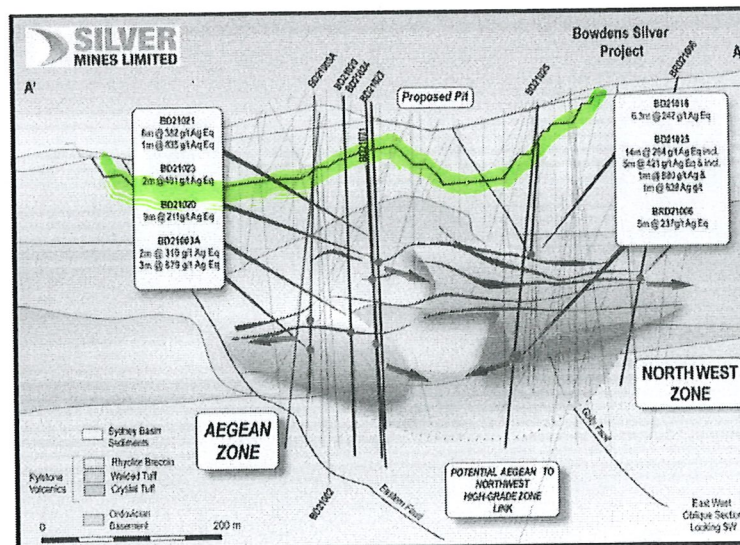
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Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
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DRILL HOLES AND WATER TABLE

I **object** to this proposal (SSD 5765).

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This section by Bowdens shows the pit and the exploration drill holes. There is a length of 30,000 lineal metres of diamond (and possibly percussion holes). As the section shows the average depth would be five times the depth of the main proposed pit.

The question I ask is about the impact on ground water. Has the draw down due to exploration holes been factored in to water availability and more so what is the impact of these holes on district underground water for other users.

Water tables and perched water tables which have been penetrated will obviously drained or at least potentially draining.

Under the NSW mining rules **Coal and Hydrocarbon exploration holes** are required by law to be **fully grouted** at completion of drilling. Not so for **Mineral exploration**; merely the **top 2 metres** is to be grouted. And that was the proposal by Kingsgate when they obtained their exploration DA.

At Bowdens therefore all of the holes 30 kilometres of drilling are still open and causing groundwater loss.

Until Bowdens either grouts all holes to restore natural groundwater or proves that their impact is no worse than neutral, Bowdens need to be put on warning by DPIE.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chi' or 'Chie', with a stylized flourish at the end.

R C Plummer

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30 March 2022

The Director,
Resource Assessments,
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Locked Bag 5022,
Parramatta,
NSW 2124

Dear Sir,

APPLICATION NAME: BOWDENS SILVER MINE AMENDMENT
APPLICATION NUMBER: SSD5765
DEPARTMENTAL DIFFICULTY OF DATES

Today is the 30th March. And today your letter arrived advising that I could make a further submission on the Bowdens proposed mine.

Your letter says that the exhibition will last from 25th March to 7th April. Why the extra 5 days when you have required that our submissions must be lodged by Thursday (sic) 2nd April.

However, THAT DATE DOES NOT EXIST ON THE CALENDAR.. 2nd of April is Saturday

Please correct your clerical and temporal errors.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Chir' or 'Chir.', with a stylized flourish at the end.

R C Plummer