

Mudgee District Environment Group
Submission of Objection to Bowdens Project Amendment

8th August 2021

Mudgee District Environment Group (MDEG) strongly objects to the Bowdens Project and Amendment to develop an open cut mine in the Lawson Creek Valley, including a realignment of the 500kv powerline.

MDEG members wish to present the following concerns:

1. PROCESS, CLARITY AND TRANSPARENCY:

The amendment to include the realignment of the powerline should not have been needed. This should have been included in the Part 4 application from the beginning. The project has not been assessed by the Department, and exhibition of this amendment has caused confusion in the community.

A major component of the project is the proposed water supply pipeline from the Ulan coalfields to the project site. This has not been adequately assessed. This component is crucial to the viability of the project and should have been fully assessed and included in the Part 4 application.

Thus, Bowdens EIS was flawed.

Bowdens state the Amendment Report should be read in conjunction with the Submissions Report. The Amendment Report does not list Appendices in the Contents. Therefore when commencing to read that document it is logical to assume that the Appendices referred to, are those attached to the Submissions Report. In fact, this is not the case, as the Amendment Report contains 3 Appendices totalling 126 pages. This lack of attention to detail is concerning.

The Submissions Report lists Appendix 8 as 'ATCW letter'. This label is unhelpful: it would have been clearer to label this Appendix as relating to the Tailings Dam – which it does. We note that Acid Mine Drainage (from the Tailings Dam) has not been addressed by the Applicant in any of the documents on exhibition. This denial of scientific knowledge and community concerns is reflected in the terminology used by the applicant: 'leachate' and 'seepage' are not equivalent to Acid Mine Drainage. This lack of transparency and appropriate response is alarming.

2. THE AMENDMENT:

2A. Visual impact: The realignment of the 3km long powerline to a ridge top position will impact on the natural and rural landscape of the district. The 10-14 steel towers between 45 and 60m in height will be visible from Lue Road, the village and many district localities and properties. This destruction of the ridgeline view is unacceptable.

2B. Biodiversity impact: The realignment of the powerline will result in the destruction of Box-Gum Woodland – a Threatened Ecological Community. As 95% of this Community has already been cleared in the Central West, it is incumbent on all to protect what is remaining. This vegetation provides habitat for threatened species. Tree hollows are a significant component of this vegetation

and there is insufficient data about hollows in the realignment corridor. Removal of tree hollows is a Key Threatening Process, and should not be permitted to occur.

Much of the planned biodiversity offset area is on Bowdens land. There should be a buffer zone between the mine and offset areas, as well as between the mine and retained vegetation.

2C. Cultural heritage impact: The Traditional Pathways of the Aboriginal people are intrinsically tied to the landscape. Changes to the visual landscape impact negatively on their connection to the land. It is noted that the Aboriginal stakeholders consulted did not endorse the final landforms. It is imperative that all artefacts and occupation sites, including boulder shelters, be treated with the greatest respect and according to their wishes. The Rock Shelter with hand stencils must be found and protected. There must be no impact to this site.

3. THE PROJECT:

As outlined in our earlier submission, this project is unsustainable. We re-iterate our objections. MDEG feels that the risks to health, air, water (water table, water supply pipeline), biodiversity and heritage have not been adequately assessed or mitigated.

The Waste Rock Emplacement, Acid Mine Drainage, Tailings Dam and Rehabilitation of the site, remain significant issues that have not been acknowledged and addressed by the applicant.

CONCLUSION

This project creates major risks and loss to the environment and to the health of the Mid-Western Regional Council community:

- Risks from Lead Dust.
- Poisons from a Cyanide Plant.
- The destruction of the water table.
- Wrongful use of Goulburn River water and adverse impacts on The Drip and Goulburn River.
- Risks from the massive toxic rock emplacement area and tailings dam.
- Risks to native vegetation and animals.
- Noise pollution.
- Transport of explosives and oxidising agents risks.
- Blast Fume risk.
- Devaluation of property values.
- Loss of long term rural employment.
- Loss of community values for the residents of Lue village.
- Risk to the community of serious long term health problems.
- Poor rehabilitation plans creating long term risks.

Mudgee District Environment Group strongly recommends that this project as amended should not be approved.

Yours Sincerely,

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