

Director Resource Assessments, Planning and Assessment
Department of Planning, Industry and Environment
Locked Bag 5022
PARRAMATTA NSW 2124

Submission

Applicant – Bowden’s Silver Pty Ltd
Application Number – SSD- 5765
Application – Bowden’s Silver Mine

I object to the Bowden’s Silver Mine proposal.

Thank you for this opportunity to object to the Bowdens Silver Mine Proposal.

5.2.4 Characterising risks to human health

Bowdens wrote:

“While risk assessments can help to quantify levels of risk, and consider acceptable levels of risk outlined in the NEPM (NEPC 1999 amended 2013c), risk is usually an emotive issue and the level of perceived risk acceptable to the community may differ depending on the knowledge and lifestyle expectations of the community involved.”

Medico-legally, health risk assessment must be complete, thorough and include all aspects of risk and although Bowdens have supplied DPIE with their analytical risk equation I see no inclusion of the Covid pandemic in their risk assessment. Stating that risk is usually an emotive issue demonstrates that Bowden’s are attempting to decrease the risks to human health, wipe it aside with their blatant disregard for the morbidity and mortality increased risk due to the already demonstrated health risks submitted by Dr Peter Bentivoglio’s report in 2020 and this is exacerbated by the Covid pandemic which is here to stay and quite clearly any lung or kidney issues due to lead build up will contribute to more Covid deaths than Bowden’s could ever envisage.

Employment

Bentivoglio Olives is a small business operating since 1997 and we have employed a minimum of 7- 20 persons for the last 24 years from the local area. Does DPIE not take this into consideration?

Neighbours

Bowden's wrote:

"Bowdens Silver is also fully committed to work with its immediate neighbours to ensure that the changes likely to be experienced as a result of the Project are acceptable to the neighbours, i.e. through the adoption of a range of neighbour-specific measures. It is important to Bowdens Silver that the concerns that have been expressed by Lue and district residents are responded to and managed through the adoption of the practical mitigation measures recommended throughout the comprehensive range of environmental studies prepared for the Project. "

"Bowdens Silver is proud of its interactions with the community to date and would continue to consult widely with the Lue and district community and surrounding rural areas and towns to ensure factual information is provided and any potential concerns are promptly addressed."

Bentivoglio Olives are immediate neighbours of Bowden's mine located in Monivae and classified as part of the district of Lue. Bowden's totally disregard our olive grove by not even placing our grove and facilities on their maps, see Fig 1.2 Local Setting plan.

they cover us up with a reference chart.

DPIE has no direct view of how close we are to the mine and therefore DPIE are not made aware by Bowden's that we even exist within 4-6km and as residing in Monivae and in the district of Lue.

There have been no interactions with Bentivoglio Olives and Bowdens. This is a falsehood.

Lead

Bowden's wrote:

"Furthermore, there are no health risk issues relevant to the Project for any members of the community, including children and sensitive individuals. Notwithstanding, in addition to the extensive range of proposed management measures to minimise dust generation and dispersion in accordance with best practice for mining, reactive / adaptive management would also be applied to ensure that Bowdens Silver promptly respond and resolve any unexpected outcomes."

This statement, surely, the DPIE can see is a falsehood created by Bowden's to sway the DPIE into thinking there are no risks. Morbidity and mortality risk outcomes due to lead dust exposure have escalated now we have the COVID pandemic here to stay. The NSW Health Department is struggling to control the rate of infection and with the future risk of underlying lung and kidney disease from lead accumulation the Mid Western Area Health service will be severely impacted. There are not enough funds in health now, Government is struggling so how is DPIE going to justify that this mine go ahead with the knowledge that their will be huge detrimental effects on the already struggling NSW health system.

"No health risk issues of concern have been identified for Lue and surrounds either during or post completion of operations. This includes assessment of multiple pathways of exposure including air-borne exposures, exposure through food grown on properties in the locality and exposure through water tanks (drinking water), amongst others. "

DPIE has already been sent the report and references for Olives by Jayne Bentivoglio of Bentivoglio Olives and Rylstone Olive Press in July 2020 objecting to Bowden's Lead mine. The higher concentrations of trace elements in the tissues of olive fruits in addition to the dust deposited on the surface may have detrimental effects on birds feeding upon them. It is well known that olive trees are long living trees living for 100's of years which can take up trace elements from the soil, water and air and retain them for a very long time. With the Bowden Silver Lead Zinc open pit remaining open that way for over 200 years as it probably will not fill in that time with water the dust whipped up by the numerous storms we encounter here will continually contaminate our olive trees and cause further harm to wild life.

. Ref 1. Biomonitoring of Trace elements in the leaves and fruits of wild olive and holm trees, P. Madejon, T. Maranon, J. Murillo Seville Spain May 2005

Lighting Impacts

Bowden's wrote:

"The potential for lighting impacts (including sky glow) on the local environment has been assessed to be minimal."

From our home at 25 Mossy Rock Lane, Monivae we can see the sky glow from the Ulan Mine its 75 km from our home. Bowden's is 4-6km and we will look down on the site as we are at 730m altitude at the house and grove is 750m. This will not be a minimal impact to us it is definitely a maximum impact potential.

Tailings Dam

Bowden's wrote:

"It is proposed that in the event the Project is approved, further assessments would be undertaken to confirm the detailed design of the liner for the TSF. These assessments are standard engineering practice and would further refine understanding of seepage flux and determine the most effective design elements for mitigation and would involve further seepage modelling that is informed by detailed geotechnical investigations."

The DPIE should respond to these statements of Bowden's. We are all aware of the fault lines that go right through the tailings dam and the mine pit site and Bowden's will never be able to control the seepage caused by these fault lines. Movement happens in rock all the time and water springs pop up all over our property in different places after weather events or cracking appears during drought. These fault lines will not be able to be sealed.

Bowden's supporters

Apart from the CEO who has submitted 2 supporting submissions for the Mine Bowden's have sent duplicates and triplicates of support letters to the DPIE in favour of the mine. However who are the most important people, is it not the locals and local stakeholders. People from the localities of Lue, Monivae, Pyangle, Havilah, Hayes Gap, Bara, Camboon and Breakfast Creek with 131 submissions opposing the project and 73 from these important areas supported the project. Where does this sit with the DPIE?

Bowden's reported this statement of a local:

"The Mine will mean work for the local villages and towns. This will also mean more business / customers to the towns and villages. Deborah Ann Holla of Kandos, NSW (SE-8603651)"

This woman has permanently left the area and resides in Sydney, Bowden's used her support letter in their submission because she was employed by Bentivoglio Olives, however, she made the decision to move to Sydney to look after her aging parents.

Bowden's wrote:

"There is no such thing as a "zero level" of lead in any media as lead is naturally occurring and will always be present at some level in the environment. When undertaking any analysis, the laboratory method can only achieve a specified level or limit of reporting (LOR). Where lead is not detected by a laboratory, this just means it is lower than the LOR and cannot be detected by the analytical method used. This does not mean it is zero."

In the Submission report of Jayne Bentivoglio 2020 it was stated that lead is not tolerated in olive oil. In fact, the only trace elements that are tolerated are found in the IOOC Standards for Extra Virgin Olive Oil and Virgin Olive Oil, lead is not included.

Bowden's wrote:

"The contribution of lead from the Project to soil in the area would be negligible. This impact was quantified in the Human Health Risk Assessment (enRiskS, 2021) which assessed that, based on the outcomes of air quality modelling and predictive analysis, the total concentration of lead in agricultural soil at the maximum impacted receptor would be below the detection limit for lead in soil. (i.e. <1 mg/kg).

This concentration is negligible and would not be measurable in any soil analysis. The deposition of lead to soil and accumulated concentrations would also decrease with increasing distance away from the Mine Site.

"It is noted that lead, particularly from mineralised materials, is poorly taken up into plants, so no mine-related impacts upon crops (including grapes, olives and lavender) would be expected. Similarly, the deposition of dust from the Mine Site to dams would be very low or negligible with any small amount of dust deposited mixing with the water in dams rather than deposited on land to accumulate in the top 15cm of soil. Due to the very low concentrations of dust deposited on the surfaces of dams, and the fact that mineralised materials are poorly taken up by plants, it is considered that irrigation water sourced from surrounding farm dams would not be adversely impacted by the Project. "

Again, I draw the DPIE's attention to the report from Jayne Bentivoglio Submission July 2020 and the Biomonitoring of Trace elements in the leaves and fruits of wild olives referenced again below.

The higher concentrations of trace elements in the tissues of olive fruits in addition to the dust deposited on the surface may have detrimental effects on birds feeding upon them. It is well known that olive trees are long living trees living for 100's of years which can take up trace elements from the soil, water and air and retain them for a very long time. With the Bowden Silver Lead Zinc open pit remaining open that way for over 200 years as it probably will not fill in that time with water the dust whipped up by the numerous storms we encounter here will continually contaminate our olive trees and cause further harm to wild life.

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Transmission Line

Bowden's have submitted an amendment to their EIS to include the re-routing of the Transmission line in Lue. The construction will require clearing of up to 70m x 3500 of bushland and the cleared land will be visible from neighbouring lands and the Lue Road. Tourist s who visit our Cellar Door love the landscape driving from Mudgee to Monivae to visit the Rylstone Olive Press and always comment on the beautiful landscape. Well, that will change, there will be Transmission lines and B double trucks lining the road, removing the aesthetics of the landscape. Does the DPIE understand this out-come.

Bowden's have not provided accurate maps and photos for the relocated Transmission lines. If Bowden's can sweep our Bentivoglio Olives and Rylstone Olive Press from the maps and location to the mine by using a reference chart to disguise us the DPIE has to question what else is Bowden's keeping covered up from DPIE.

Costs

Who really bears the costs of the following? Is it the Tax Payer?

Health Costs

Transmission Line re-alignment

Land restoration costs

Enviromental mine disaster costs

Bushfire disaster costs

Railway bridge costs

Public road costs

56 Km water pipeline through a narrow wooded reserve with contaminated water costs

How much is enough when the DPIE has to consider all of the above costs which would far out way the royalties NSW Government will earn from this mine.

Bowden's have coerced the DPIE into considering their royalty benefits to government but really DPIE are you going to take the words of Bowden's and use them to support the Bowden's mine project as they state:

" the substantial economic benefits of this section of the open cut pit including royalties to the State of NSW."

Bowden's are just luring DPIE to accept a disaster waiting to happen.

Look at how NSW is falling apart at the seams with COVID. Does the NSW Government have the money to support disasters like this waiting to happen.

Again, I beseech DPIE to object to the disaster of a project, Bowden's Silver (Lead) Mine in our area.

Attached Docs

Jayne Bentivoglio 2020 Submission objection to Bowden's Silver Mine.

Yours sincerely

Jayne Bentivoglio

Bentivoglio Olives
Rylstone Olive Press