



7 April 2022

Submission objecting to Bowdens silver mine, Lue NSW

Running Stream Water Users Association was formed in response to concern about the negative impact of mining on water resources. We are extremely concerned about the negative impacts this mine, if it goes ahead, will have on the water resources of the area.

Right from the start this mine proposal has been dogged by the lack of sufficient water resources, with two attempts (that we are aware of) to source water from elsewhere: the original owners, Kingsgate contemplated trucking the ore elsewhere for processing, and Bowdens in their DA submission proposed a pipeline from the Ulan and Moolarben mines. To propose such an expensive solution indicates Bowdens were well aware there was insufficient water available on site. Conditions have not changed so the question has to be asked how they now think there is sufficient water.

It seems Bowdens have achieved the right numbers on water availability either by using inaccurate water data or excluding relevant data.

The amendment refers to 673ml annual rainfall for the mine area, whereas the BOM gives 614ml/a for Lue. Bowdens refer to annual rainfalls for Mudgee (656ml/a) and Rylstone (635ml/a), but this is misleading as it is well known by locals that Lue lies in a rainshadow and receives considerably less. Data for the years 1888 and 2019 is missing. These were the two driest years on record in the area. One asks why is this data missing? Furthermore, nowhere is there discussion of impact of reduced rainfall due to climate change.

Australia's climate variability is well recognised: in their modelling Bowdens allow for highs of 30% above average but only allow for lows of 14% below average. This is ludicrous. Any landholder who keeps rainfall records knows that dry years can go as low as 50% below average.

Bowdens' original EIS, when water was going to be piped from elsewhere, included a table showing the impact of the mine on downstream catchments. Despite this significant amendment of now sourcing all water on site, there has been no change to this table. One does not have to be an expert to realise this is incorrect.

Another major concern with this proposed mine is the impact of acid mine drainage. Nowhere is this issue addressed, either in the original EIS or this amendment. Acid mine drainage has the potential to leach heavy metals into Lawson Creek and this could impact fauna and flora along the creek for at least 20 km over many decades, thereby endangering the Putta Bucca Wetlands on the outskirts of Mudgee.



Thirty million tonnes of sulphide ore is planned to be mined. The EIS notes on pp. 8–16 that pyrite (iron sulphide) is the most wide-spread sulphide material found. Fig 10 of the leachate columns shows that the pH of the leachate of one sample was consistently pH 3 or less (i.e. quite acidic). The assessment by Bowden Silver thus fails to show that acid mine drainage will not occur. It has occurred with every other sulphide mine. It will occur here also.

We need to be shown the design of the waste rock dump to see exactly how air and water will be sealed off from entering in the long term.

We need to know the long-term security of the tailings dam, with multiple redundancies to ensure it will not collapse (as has happened at Clarence Colliery).

There needs to be a higher bond on the company for long-term measurement of acid mine drainage and heavy metals and a serious fund to treat this, possibly for decades.

Bowdens have failed to discuss any of these issues. All will have substantial cost and the community should not have to pay the cost.

Yet another concern is the relocation of the powerline. Moving the line a mere 100 metres from the original proposed route does not address any of the objections made previously. The power line will still have an enormous impact on the visual amenity of the region which is a major tourist destination. Bowdens' statement that only four landholders are affected is simply wrong.

The power line realignment will result in the removal of Box Gum Woodland, a threatened ecological community, of which only 5% remains in the Central West, thus making every hectare precious. We cannot afford to lose any more.

This submission is written in haste because of the incredibly short timeframe – a mere two weeks – allowed for community response. We therefore do not have time to properly reference the points we make. However, we are aware of experts in the field who will be submitting detailed referenced submissions which will corroborate the points made here.

Yours sincerely

Fiona Sim (President)

on behalf of Running Stream Water Users Association