



I N L A N D
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Major Project Assessment
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Submission of Objection
Bowdens Silver: Project SSD-5765
(EXH-39437454)

Introduction

The Inland Rivers Network (“IRN”) is a coalition of environment groups and individuals that has been advocating for healthy rivers, wetlands and groundwater in the Murray-Darling Basin since 1991.

The proposed lead, zinc and silver mine at Lue is in the headwaters of the Macquarie River catchment, a major tributary of the Murray-Darling Basin.

IRN has lodged a previous objection to the mine proposal because it has been poorly assessed for long-term environmental impact on water sources in the region.

It is of interest that the proposed changes to the mine application relate to water availability. The initial project assessment, conducted during a major drought, had identified that additional water would need to be sourced through a pipeline from the coal mines at Ulan for the mining project to be feasible.

Now that the climatic cycles have entered a wetter period, the proponents are now claiming that the proposed mine will be viable with water available on site.

There is no credibility in this claim and indicates a very poor assessment of water sources under climate variability and extreme weather events over the life of the proposed mine.

Objections:

IRN objections to this proposed mine remain unchanged to those submitted on 24 July 2020.

These include:

1. Surface water impacts

The construction of a large tailings dam containing heavy metals and cyanide within a kilometre of Lawson Creek has a high risk of environmental harm.

The assessment of the integrity of the proposed structure does not consider increased intensity of rainfall events in the catchment caused by climate change.

The amended project now on exhibition claims to source adequate water supply for mining operations from the combined capture of onsite surface water flows and groundwater interception.

The latest modelling for climate change in the Macquarie Region conducted by the Department of Planning and Environment – Water must be considered when assessing the long-term impacts of this proposal on water sources.

The capture of surface flows that currently report to Lawson Creek and the storage of waste water in a tailings dam that has the potential to release highly toxic pollutants into the creek is not environmentally sustainable.

2. Groundwater impacts

The original development application proposed drawdown of regional groundwater over a 200-year period. The amended project is now based on sufficient groundwater sources to provide adequate water supply for mining operations. The possible additional draw down has not been adequately assessed. The proposal is unacceptable and cannot be approved.

The retention of a highly toxic pit lake in the landscape will create a permanent environmental threat. The prediction that groundwater will be polluted up to 40m from the mine site is not acceptable and is very conservative. The pollution of groundwater with heavy metals and acid mine drainage is a high risk that has not been adequately assessed.

The stability and security of the final void and its capacity to withhold major storm events into the future has not been addressed.

3. Acid Mine Drainage

There has been no assessment of the high likelihood of this mine proposal producing a long-term and irreversible environmental legacy through the drainage of sulphuric acid into the surrounding landscape and water sources.

The Environmental Impact Statement is highly deficient on this matter. The amended proposal on exhibition fails to assess this high-risk environmental impact.

Conclusion

Water-sharing in the Murray-Darling Basin and Macquarie catchment is a hugely complex issue. Mining is an intensive 24 hr/day water user creating significant land and water use conflict.

The doubt surrounding adequate water supply for a viable heavy metals mining project at Lue has not been addressed by this amended proposal on exhibition.

The high risk of long-term pollution of productive and environmentally healthy water sources is too great.

The Bowdens Silver mine cannot be approved under the principles of ecologically sustainable development.

For more information on this submission contact:

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