

Objection to Bowdens Lead Zinc Silver Project (SSD-5765)

Amended approach to water

I live downstream from the proposed project (SSD-5765), and ground and surface water availability is critical to our livelihoods, and the livelihoods of many in the Lue and surrounding Lawson Creek valley.

The assumptions made in the Proponent's Amendment Report regarding the sources and availability of water required by this project have been inadequately assessed and require far more rigorous review by independent surface and groundwater experts.

The sudden change in approach from the Proponent to sourcing water for the Project must be scrutinised thoroughly.

The proposal to increase local water take both from within the mine footprint and on neighbouring Proponent-owned land will have significant impacts on other stakeholders and I do not believe these impacts have been adequately assessed through the process of this amended application.

If the disorganised and ad hoc approach the Proponent has displayed to a component as critical to mine planning and environmental assessment as the key water supply for the Project is indicative of their approach to developing and operating the Project, then trusting them to develop, operate and rehabilitate the mine is reckless.

Tailings storage

The proposed project relies on tailings containment engineering designs which are unproven over the long term at this scale, and are extremely difficult to construct and design.

Proposing to store 30 million tonnes of potentially acid forming tailings across a 117 hectare tailings dam sitting directly above the water table and Lawson Creek relying on these untested and unproven engineering designs presents an unacceptable, intergenerational risk to the Lue and wider environment and community.

We rely heavily on both ground and surface water to sustain our livelihood. The water contamination potential over both the short and long term that this project carries, including from highly toxic chemicals used in ore processing like arsenic, antimony, fluorine and manganese, along with tailings content comprising 17 – 20%¹ of the lead, zinc and silver mined due to losses in ore processing is unacceptable.

There is no evidence or track record to suggest these containment designs will be effective and will not leak either during the life of the mine or for the very long-term future period during with the potential for acid mine drainage will continue.

The only way leaks could be detected is when acid mine drainage has already escaped the containments and entered the surrounding environment. This is unacceptable.

¹ Feasibility Study, Bowdens Silver Project, 14 June 2018, p.19 ASX release on company web site

If a leak was successfully detected, the Proponent's EIS is silent on the ability or approach to repair these leaks. This would mean the toxic chemicals are leaking into the surrounding environment forever. This is unacceptable.

Failure to account for long term social impacts of approval

There are few, if any, examples of small villages which have flourished as a result of large open cut mining operations being proposed, commencing, continuing or expanding in their vicinity.

But, there are numerous examples of villages and communities which have been virtually decimated as a result. In the mid-western and Hunter region alone, villages like Bylong, Wollar, Ulan and Bulga have become ghost towns. These villages were once just like Lue is today.

Numerous social impacts of the project have been assessed, however one impact which has not been considered is the social repercussions the project will have over the longer term as future applications are inevitably submitted by the Proponent for modifications, extensions or expansions to their Project Approval.

It is clear from the Proponent's investor and market communications that they are actively and aggressively exploring in the wider Lue, Bara and Botobolar areas with results touted as promising and exciting for future project expansion, including as a potential underground operation:

Scoping Study and Mineral Resource Drilling Program

» The Company currently has four drilling rigs on site nearing completion of the 30,000 metre diamond drilling program targeting high-grade zones outside of the current open pit Ore Reserve of the Bowdens Silver Deposit. Results from this drilling will form the basis for a Mineral Resource estimate as part of a Scoping Study of underground mining scenarios. The program of drilling will complete in 1st quarter 2022 in line with the outstanding new results and extensions from the Bundarra Zone. The Mineral Resource assessment is expected to be completed during the 2nd quarter 2022.

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While the Department can only assess impacts of the current project as submitted by the Proponent, it is critical that long term social impacts associated with any approval are included in this assessment.

If the project is approved now, the local Lue and surrounding community will be condemned to live with not only the immediate social impacts of the project, but also to endure what will likely become a decades-long struggle to preserve it's community, environment and social fabric from destruction by a Proponent with publicly stated plans to explore for expansion opportunities in the area.

If exploration is merely for marketing purposes and the Proponent intends to sell the Project once approved, then the risks to the community are no less as in that case, no one knows who may end up holding the Project Approval and operating the mine, what their credentials or ESG performance is like.

² Silver Mines Limited ASX Announcement, "Increasing Gold and Zinc in Drilling at Bowdens Silver", 28 March 2022, https://cdn-api.markitdigital.com/apiman-gateway/ASX/asx-research/1.0/file/2924-02503415-2A1365100?access_token=83ff96335c2d45a094df02a206a39ff4

I submit that this proposal should be rejected on the basis that to not do so, is to condemn the people of Lue and the greater Rylstone and Mudgee regions to decades of living with a mine which might employ a handful of locals, but which will definitely threaten our environment, health, community and social fabric.

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