

**Mudgee District Environment Group  
Submission of Objection to Bowden's Silver Project Lue**

24.7.2020

Mudgee District Environment Group (MDEG) strongly objects to the plans to build a Silver Mine in the Lawson Creek Valley.

**MDEG members wish to present the following concerns:**

**1. RISKS FROM LEAD DUST:**

Lead, silver and zinc occur together geologically. You mine one, you get all three. That is the situation at the proposed Bowden's Silver Project at Lue. The expected output of all three minerals has been calculated and stated in the company's EIS.

- Lead will comprise almost 50% of their total expected production from their open-cut Mine operations.
- Where is the scientific evidence to say that toxic lead bearing dust won't blow into the Towns of Lue, Rylstone and Mudgee and surrounding rural areas? To say it won't doesn't make sense. Lue and surrounding areas have experienced dust carried from Bourke and South Australia. Dust travels and so does the lead in it. Claims that the dust from the mine won't affect anyone in the area are simply not true. The air pollution will pose a risk to the health of all residents in the area.
- The adverse health effects of lead are well known. The World Health Organisation states that: "young children are particularly vulnerable to the toxic effects of lead and can suffer profound and permanent adverse health effects, particularly affecting the development of the brain and nervous system. Lead also causes long-term harm in adults, including increased risk of high blood pressure and kidney damage. Exposure of pregnant women to high levels of lead can cause miscarriage, stillbirth, premature birth and low birth weight."
- To have this mine within just 2km from the village of Lue and its school is not acceptable.
- There is a real possibility that the open cut mine will lead to a significant decline in air quality and increased pollution due to particulate matter, including lead.
- The impacts of lead pollution, have been clearly demonstrated and documented in the Broken Hill region They are extremely difficult to remediate and have tragic long-term and irreversible consequences, particularly for children.
- The proposed mine is to be constructed amongst existing food producing farming enterprises which include residences. There is likely that these rural enterprises will have to cease production and residents move away?

We believe this project is not worth the risk? Lead exposure *is preventable!* The easiest way to do that, is to not approve the Bowden's mine proposal

**2. THE POISONS FROM A CYANIDE PLANT:**

MDEG is very concerned about the risks from the proposed Cyanide processing plant at the Bowden's mine. Cyanide is acutely toxic to humans, other mammals and aquatic species at low dosages, as it interferes with oxygen utilization

### **3. UNACCEPTABLE ADVERSE IMPACTS ON WATER:**

#### **3. a. THE DESTRUCTION OF THE WATER TABLE:**

- The proposal to use approx 2000 Megalitres of water each year with approximately 800 mega litres of this water to be taken from the Lawson Creek Valley will destroy the water table. Lue is the traditional owners name for “a chain of waterholes” and is fed by groundwater. Bowden’s Silver Mine will destroy the local waterholes and springs. This mine will irreparably damage the water supply for local users and the environment.

#### **3. b. WATER FROM THE ULAN MINE and PIPELINE:**

The Bowden’s project does not have sufficient water without relying on external supply. Therefore the silver company aims to develop a contract with Ulan mines to buy excess water and bring it to the Silver Mine via a 60k pipe line.

- This water is part of the Upper Hunter catchment and should be returned to the Goulburn River as part of the environmental flow releases
- The recently (May 2018) released Commonwealth *Bioregional Assessment for the Northern Sydney Basin-Hunter Sub region* has raised concerns in regard to cumulative risks of potential hydrological change in the Hunter sub region which includes the Ulan Mine site.
- The quality of the water proposed to be transferred from Ulan to the Lue mine site is not specified. Any release of contaminated mine water from Ulan and then released at the Lue site would be likely to be deleterious to local residents, farming operations, waterways and biodiversity.
- Can Ulan mines commit to a guaranteed supply arrangement for Bowden’s Project regardless of seasonal conditions? How can they realistically consider diverting water continuously to Lue? The Ulan area mines’ own water requirements will always come first and particularly in drier periods.
- The conditions of approval for Modification 4 at Ulan Mine states that there be “No impact on the water supply to the Drip” (This also applies to Moolarben Modification15 stating that there be “Nil impacts on the water supply” in the Goulburn River at The Drip.) If the pipeline were to go ahead these commitments will be impossible to fulfill.
- During the recent drought Ulan Coal stopped releasing water into the Goulburn River and the water at the Drip picnic area completely dried up. MDEG quickly reminded Ulan Coal of their legal obligation and desalinated mine water was then released into the river restoring a reasonable flow.
- The Drip and the Goulburn River impacted by two very large mines cannot afford to lose any more water.
- This water is Goulburn river water and should stay there to protect the headwaters of this important river system and the much valued public amenity “The Drip picnic area and river walk”.

To ensure the provision of water be maintained at The Drip MDEG strongly opposes the plan to bring water from Ulan coal mine (or Moolarben) to the Silver mine at Lue.

Furthermore the pipeline is not consistent with the Mid Western Regional Council LEP in the EIS executive summary pES-5 it identifies that RU5 – Large Lot Residential Lands prohibit water supply works.

### **3. c. RISKS FROM THE ROCK EMPLACEMENT AREA AND TAILINGS DAM:**

This project will create two massive dumps containing acid forming rock and toxic tailings that will be perched above the water table and local creek catchments including Price Creek, Hawkins Creek and Lawson Creek. The huge single wall tailings dam will be less than 1 km from Lawson Creek.

- Lawson Creek feeds into the water table of Mudgee Town's water supply!
- Over the mines life 43,700 tonnes of toxic and hazardous chemicals, including Arsenic, Cyanide, Cadmium and Lead, will end up in the tailings. These tailings will sit above the current water table in the catchment of the Lawson Creek – forever.
- The Project proposes to prevent contamination of the downstream environment by sealing underneath and capping both the Waste Rock Emplacement Area and the Tailings dam. However MDEG has been advised by Lue Action Group they have received expert advice that “it will be difficult to build to design and to quality check construction to meet design”. Leakage will not be known until it is already polluting the surrounding environment. The location of the leaks will be extremely difficult to pinpoint and in many cases repair will not be possible.
- It is well know that many other tailings dams have leaked or even collapsed. The toxic water will flow into Lawson Creek carrying the hazard to Mudgee and Gulgong. Is it worth that risk of these toxic wastes infiltrating the town water supplies?
- Where is the comprehensive scientific study to prove that this risk is not a valid concern for these communities?
- When the life of the mine is over what commitment does our local community have that the tailings dam will be maintained, monitored and repaired? What Agency will do this forever?

It is not worth the risk. Please do not approve this mine!

### **4. THREATS TO BIODIVERSITY:**

Both the proposed Bowden's Silver Project and the planned pipeline will have adverse impacts on native Flora and Fauna. At Lue the 436 ha site and the additional corridor of land 60 km long and “about 6 m wide”, of which 52% is native vegetation, will threaten ecological communities

- The proposed project should be considered a controlled action under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* because it is likely to have significant adverse impacts on Matters of National Environmental Significance including nationally threatened ecological communities
- 148 ha of White Box-Yellow Box-Blakely's Red Gum Woodland (Box Gum Woodland) in moderate-good condition at the Lue mine site is proposed to be removed. The site is listed as critically endangered under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999*. Since 2000 there have been ongoing incremental losses of this critically endangered community in south-eastern NSW. The first objective of the National Recovery Plan for Box Gum Woodland (White Box – Yellow Box – Blakely's Red Gum and Derived Native Grassland) which was prepared in 2010 by the NSW Department of Environment, Climate Change and Water on behalf of the Australian Government is to: “*Achieve no net loss in extent and condition of the ecological community throughout its range.*” These ecological communities have already declined to a critical level. Offsets and mining rehabilitation have not been effective at restoring this habitat type.

Techniques are particularly lacking for ground cover plants like forbs (flowering herbs).

- The disturbance area of the proposed pipeline appears to not yet to have been adequately surveyed. It is therefore expected that additional areas of nationally threatened ecological communities will be impacted during construction and operation of the pipeline.

According to the referral document the proposed mine will remove significant amounts of known or potential habitat permanent loss of 402 ha of habitat for:

- Koala (recorded on mine site), Regent Honeyeater, Large-eared Pied Bat, Spotted-tailed Quoll and the South-eastern Long-eared Bat

#### **5. NOISE POLLUTION:**

- The mine proposes to operate 24 hours a day, seven days a week. Noise models indicate massive increases in noise levels in the Lawson Creek valley. This mine is just 2km from Lue village. Noise travels big distances at night. It is not only residents of Lue who will be affected those on rural properties further away will hear it also.
- The increase of trucks and noise levels through Mudgee will impact adversely on this region raising levels of stress and consequent mental health issues.

#### **6. ROAD TRAFFIC RISKS**

- The project proposes to bring 5-16 tonnes of both explosives and oxidising agents (like AN ammonium nitrate) to the mine site daily along the Mudgee –Lue road creating a risk to other road users and residents.
- The increase of B-Doubles will increase the risks for tourists and residents alike on the narrow country roads.

#### **7. BLAST FUME RISK:**

- When water affects non-waterproof explosives in the blast hole blasting can produce toxic orange fume. The proximity of the mine to Lue village and surrounding properties creates a risk.
- MDEG is of the opinion that the EIS does not adequately address this issue on how they will manage this problem.

#### **8. DEVALUATION OF PROPERTY VALUES:**

- Property values will be negatively affected if this mine starts. Who would want to buy a home next to a toxic noisy mine?
- Residents have told MDEG that Bowden's have shown no interest in purchasing properties or compensating landowners not under their footprint.

#### **9. SHORT TERM VERSES LONG TERM EMPLOYMENT:**

- The jobs associated with the mining will be a very short term - 16 years.
- This mine will put the long term employment from tourism and rural enterprises in our beautiful regional environment at risk.
- Rylstone and Mudgee are a very popular destination with tourists these days creating increasing jobs and economic benefits. This thriving industry, very much needed in our current economic situation, will be adversely impacted if a Toxic Silver (Lead) Mine and Cyanide Plant is approved!
- The relative small number of jobs created by the mine for a short period will never make up for the permanent loss of rural business enterprises and employment

## 10. REHABILITATION ISSUES

- The mine will be only here for 16 years.
- Bowden's have declared that they will not rehabilitate whole site.
- The main pit will remain forever and will take 100 years to fill with water.
- The tailings dam will also stay with its toxic sludge, risking polluting the Lawson's Creek valley, Rylstone and the Mudgee river system forever.

## 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 should not be approved.

Yours Sincerely



Phyllis Setchell MDEG Chairperson

0427920997

[phyllis.muriel3@gmail.com](mailto:phyllis.muriel3@gmail.com)