

BirdLife Australia Southern New South Wales Branch

Submission on the **Bowdens Silver Project**

**State Significant Development No. 5765**

BirdLife Australia is Australia's largest bird watching, research and conservation organisation. For more than 100 years BirdLife has been a leading advocate for native birds and for those who value them. We are an independent not-for-profit organisation with around 10,000 members and supporters.

This submission is made by the Southern NSW Branch of BirdLife Australia. The likely impacts on threatened bird species, their habitats and ultimate viability are our primary concern.

We welcome the opportunity to comment on the proposed Bowdens Silver Project at Lue. We object to the proposal as it will have a significant and unacceptable impact on matters protected under the Environment Protection and Biodiversity Conservation (EPBC) Act 1999.

### **Project proposal**

This proposal is for an open cut mine in the Lawson Creek Valley just 2km from the village of Lue, in a sensitive and significant area.

Silver Mines Limited proposes to mine 30 million tonnes of ore and 47 million tonnes of acid bearing waste rock. It will require a cyanide processing plant on site and consumption of 2,050 megalitres of water annually.

The mine proposal requires destruction over 380 hectares of native vegetation, including over 180 hectares of critically endangered Box-Gum Woodlands - White Box-Yellow Box-Blakely's Red Gum Woodland and Derived Native Grassland.

### **The project is within a region of high conservation value (Key Biodiversity Areas)**

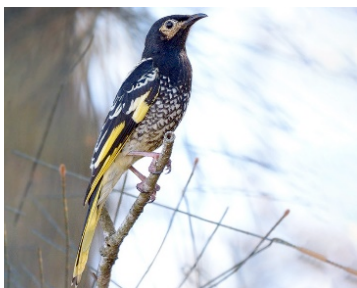


Flame Robin Photo L Seitz

The proposed project is located approximately 20 km from the Greater Blue Mountains Key Biodiversity Area (Wollemi National Park) to the east, 30 km from the Capertee Valley Key Biodiversity Area to the south, and 20 km from the Mudgee-Wollar Key Biodiversity Area to the north. The region has appreciable biodiversity significance.

Key Biodiversity Area (KBA) is a global concept of the International Union for Conservation of Nature (IUCN). The IUCN has set a global standard to identify 'sites contributing significantly to the global persistence of biodiversity'. Sites must qualify for KBA status by meeting one or more of 11 criteria which after independent scientific review and submission of documentation are confirmed as qualifying. There are fewer than 50 KBAs in NSW, with this proposed project site being very close to three of them. About two thirds of all endangered species (both fauna and flora) in Australia are found in KBAs.

### **The project is detrimental to the Regent Honeyeater and Box-Gum Woodland**



Regent Honeyeater Photo R. Citroni

We are particularly concerned about the future of the Regent Honeyeater. This bird is listed as Critically Endangered under the EPBC Act and before the summer bushfires there were only 350 to 400 adult birds left in the wild in Australia. It is thought that this number has decreased even further due to the severe summer fires.

The main habitat for the Regent Honeyeater is Box-Gum Woodland, itself listed as

a Critically Endangered Ecological Community under the EPBC Act and an Endangered Ecological Community under the NSW Biodiversity Conservation Act 2016. It is one of the most threatened ecosystems in Australia. 95% of these woodlands have already been lost mainly due to agricultural clearing and more recently clearing for mines and other commercial activities. Every loss of habitat reduces the ability of the Regent Honeyeater to survive.

According to the Australian Government Department of the Environment 2016 National Recovery Plan for the Regent Honeyeater, this species is known to now breed in only a handful of sites throughout its entire foraging range. Two of these are the Mudgee-Wollar area and the Capertee Valley, so these are very sensitive and extremely important areas. The proposed mine site is between these two areas, a short distance away.

There has been considerable effort through BirdLife Australia's Regent Honeyeater Recovery Program to increase the Regent Honeyeater population. Since 1993 BirdLife Southern NSW has coordinated the Regent Honeyeater Planting Project in Capertee Valley, replanting woodland species favoured by the honeyeater on suitable private land throughout the valley. This project is supported by Central Tablelands Local Land Services with funding from the Australian Government.

The possible loss of 182.27 ha of Box-Gum Woodland in this mining project, a short distance away, is very disheartening for the many hundreds of people who give their time to replant these woodlands. The proposed clearing of woodland for the mine would reduce the chance of survival of the Regent Honeyeater. Not only because it is a food source for these birds during the breeding season, but also because it helps provide a corridor between two breeding areas.

BirdLife's Regent Honeyeater Project Manager is aware that in 2015 a Lue bird enthusiast, while guiding a local school group investigating birds in Lue, positively identified a Regent Honeyeater. Given the low numbers in Australia this makes the Lue area important for the preservation of this species.

### **The project will reduce habitat for vulnerable and critically endangered bird species**



Swift Parrot Photo D. Adam

As well as the Regent Honeyeater there are a number of other significant, rare or endangered birds recorded in these three KBAs. These include the Painted Honeyeater, Diamond Firetail, Rockwarbler (the only bird endemic to NSW), Swift Parrot and Flame Robin. There were fewer than 1,000 breeding pairs of Swift Parrots still in existence prior to the recent catastrophic bushfire season and its numbers are continuing to decrease; it is listed as Critically Endangered under the EPBC Act. Both the Regent Honeyeater and Swift Parrot are primarily highly

mobile nectar feeders that preferentially use fertile woodlands. Habitat loss is the greatest danger to the survival of all these birds.

The eBird database shows a number of these bird species have been sighted in woodland surrounding Lue in the last two years. In addition, eBird shows that more than 100 additional different species have been recorded in the woodlands around Lue. Many of these are also declining in number. This continued decline of woodland birds was highlighted in BirdLife Australia's State of Australia's Birds Report 2015.

## The project will degrade woodland habitat



Painted Honeyeater Photo M Wright

The Bowden project will cause further fragmentation of the woodland landscape, with a number of additional serious effects. For example some birds, such as the Noisy Miner, survive and thrive better in fragmented woodland than in unbroken woodland. Noisy Miners, and some other local birds, aggressively protect their territory and tend to displace Regent Honeyeaters and Swift Parrots from fragmented habitat. Furthermore, fragmentation can isolate some populations of

birds and animals from one another, stopping genetic flow and therefore weakening the genetic diversity of a species. This can lead to reduced fitness of a population (inbreeding depression) and can make the population more susceptible to the effects of disease and other external factors.

The mining operation itself, if approved, is likely to cause degradation of surrounding woodland. Past failures of mining infrastructure in a range of mines, show that it is impossible to guarantee against tailings dam spills and resulting contamination of surrounding areas. Changes to the water table as a result of mining can cause long term decline of vegetation, ultimately death of some species and a change in composition of the pre-existing ecological community.

This mining project is expected to last 16.5 years, after which the mine owners will be required to rehabilitate the woodland. However, re-establishing Box-Gum Woodland has proven very difficult to achieve; and it takes a century or more for trees to mature and develop the hollows that many bird and mammal species require for breeding. The Regent Honeyeater, and other birds and animals, cannot wait 16.5 years, let alone another 100 years, for this woodland to be returned to them.

## Conclusion



Diamond Firetail Photo J Sama

The proximity of the project site to three KBAs is a strong indicator of the likely habitat significance of the project footprint. With up to 95% of all Box-Gum Woodlands cleared for agriculture and industry the loss of further areas, however small, would be a serious setback to the survival of the flora and fauna in this now rarest of Australian ecosystems. This loss would particularly affect critically endangered species such as the Regent Honeyeater, which could be lost forever.

This submission has focussed on the direct adverse impact of the proposed Bowden mine on bird species. There are other serious issues to be considered in addition. These include the plight of Koalas, water table and water usage issues and pollution from the tailings dam and arsenic plant.

We urge that the Bowdens Silver Project **not** be approved.

Should you have any queries or wish to discuss this submission please contact Elisabeth Dark through the BirdLife Southern NSW office on [southernnsw@birdlife.org.au](mailto:southernnsw@birdlife.org.au)



Elisabeth Dark

Conservation Subcommittee  
BirdLife Southern NSW