

# Submission. Re; Bowdens Silver Project

To Whom it may concern,

I would like to thank you for allowing me to make a submission regarding the Bowdens Project. I have been involved in the project for many years and I am pleased that we have finally reached a stage where the community can formally respond.

I am 55 years old; I have lived in Lue all my life.

My volunteer involvement in the Lue and Mudgee community is represented by.

- Past President of Lue Parents and Citizens.
- Past President of Mudgee Show Society.
- Past President of Mudgee Show Ground Management Trust
- Past Treasurer of Mudgee Public School P&C.
- Past Treasurer of Cooyal Rifle Club.
- Past Clerk of the Course Bligh Armature Race Club.
- Past President of Mudgee Beef Improvement Society.
- Past President of Lue Bush Fire Brigade.
- Current President of the Lue Action Group.
- Current project officer for Bingman Landcare.
- Current Captain of Lue/Havilah Bush Fire Brigade.
- Current member of Bowdens Community Consultative Committee.

My family moved to the Lawson Creek Valley at Havilah in 1881 and Lue in 1923. The Combes family currently own and run the large 5000 hectares 'Lue Station' which is located on the Southern, Eastern and Western Borders of the village of Lue. Our family also operates the "Louee Enduro and Motocross Complex" an off-road motorcycle facility 2km South East of Lue Village and on "Lue Station". Louee attracts some 15,000 visitors to the Valley annually injecting significant economic benefit to the region. Most of our guests travel from the Metropolitan Areas of coastal NSW.

I am a highly motivated person and have always supported projects within the region that will provide long term prosperity and benefit to the Community.

I have known about the Bowdens Silver deposit at Lue for 30 years. The earlier settlers found silver here at Lue and I have old mining shafts on my land. This is not a new discovery. I was initially a supporter of the Bowdens project. Sadly, due to the environmental dangers, projected effects on the surrounding residents and landowners, the lack of viability and short life span of the project, and the incompatibility with the current business in the local area, I now am strongly opposed. This project must not proceed as presented in the current EIS. I am not confident that any conditions imposed could result in an acceptable outcome for Lue, the local region, or the state of NSW.

I have detailed several areas of concern below. They are presented in no order.

## Mine Design.

The mine design is not acceptable. An open cut mine within 2km of a village, the tailings dam in a location that is just 1km of Lawsons Creek that is upstream from the town of Mudgee and the waste rock emplacement dumps are not in acceptable locations. The designs for the prevention of acid mine drainage are inadequate. The use of such vast quantities of water and the water source is not an acceptable plan.

Frankly, I am really surprised I am writing this submission. The design has failed to consider the effects on the current local land uses. This is a picturesque and quiet rural area where many people live. This is a highly productive agricultural area and a popular tourist destination. The design for the Bowdens mine are at odds with the current land uses and if the project proceeds under this design, I think it will create immeasurable long-term damage to what is already here. I object to the current design and recommend the plan be totally revised to consider current land uses.

In particular, the tailings dam and waste rock dumps should be placed away from Lawsons Creek and the village. This would reduce noise and improve visual amenity. The mine should also be an underground mine. Not open cut. There is no basis for a financial argument that Bowdens must be open cut. This mineral has been here for millions of years. If one cannot get it out of the ground in an acceptable manner now, we must wait until an acceptable manner has been found. The mineral is not going anywhere. There is no need to rush. Do it properly.

## Noise and Vibration.

The hours of operation requested in the EIS must not be permitted as the ambient noise levels in the valley and the village of Lue are too low. Even with the current activities like Louee Motocross, attracting 15,000 visitors a year to the valley the Ambient noise levels remain at very low 35db during the day and 20db at night.

The Bowden's Mine Project is situated 2km North of the village of Lue.

I note throughout the pages of the EIS noise and vibration report that there will be significant rises in ambient noise levels. Including noise to 45dba during the day and 35dba at night. These predicted levels in the report are simply not acceptable in Lue. The people from Lue are used to very low noise levels. For many, it is why they live in Lue. To increase their noise levels by the amounts listed in the EIS and subject those people to noise without respite is unreasonable. From my experience, considering other mines in the area that have been permitted to start close to communities, there is little doubt that the Bowdens mine will severely change the current peace and quiet in the valley.

The expected levels are modelling. There is no real evidence of what is stated in the report. There has never been an actual test of noise. Requests made by me at CCC meetings to the proponents to do a live test with plant and machinery have been refused. Noise tests conducted around the village are sparse. I own 5 homes within the impact zone of the proposed Bowdens mine. I have never had noise tests conducted at these properties.

As a member of the Bowdens Community Consultative Committee I have regularly expressed my concerns about noise that will emanate from the Bowdens Mine if it becomes operational. These comments can be found in the minutes of the CCC meetings. I have repeatedly disputed the proponents claims that noise disturbance will be minimal.

Bowdens Mine must not be permitted to operate according to the table of hours of operation contained in the EIS. The number of machines intended for use, the type of machines intended for use, the expected noise levels they will operate at, the hours of blasting are unacceptable, and many people will be seriously adversely affected by noise and vibration.

The projected increase in noise levels will interfere with other business in the area. There is currently a large tourist participation in Lue and surrounds. Currently within ear shot of the proposed mine are Louee Motocross, Elephant Mountain House, Old Bara camping grounds, Odd Frog Lodges and the Lue Hotel. These accommodate hundreds of guests. Most of these tourists are attracted to the area for sport, recreation, and relaxation. They provide a significant economic benefit to the region. The EIS does not consider the effects to these businesses. My prediction is that they will be severely affected. Would you book a relaxing stay next to a noisy dusty lead mine?

I also note that the noise predictions are linked to the machinery used. I do not believe these machinery lists are accurate. There is little chance the mine can operate with just one water cart for instance. I have extensive knowledge of dust suppression through my Motocross business. More than one water truck will be required to properly mitigate the dust concerns at the mine. Especially during summer. I suspect there are other inaccuracies with the machinery tables.

I am concerned about noise. There is little that can be done about changing the noise outcome from the current mine design. The mines proposed location is too close to the village of Lue and the mine has many neighbours. It is impractical to move these residents. It is easier to move the mine.

## **Traffic and Access.**

### **Relocation of Maloneys Road.**

The Proposed relocation of Maloneys Road and access to the Bowdens mine is on a section of road some 1.5km west of the Lue village in an area known as Donnelley's Hill.

Donnelley is the name of the original landowner who subdivided his property to small lots. Donnelley's hill is now the location for many small acreage properties and homes on the Southern side of the Lue Road. This area extends some 2 km between the village boundary of Lue and the Prime Agricultural Land of Lue Station to the West.

The proposed realignment of Maloneys Road to the mine runs from a low elevation at Lawson's Creek southward up to Lue Road at Donnelley's Hill. This presents a significant problem about noise and traffic. There are also issues with vehicles travelling during darkness.

I do not think this is a good idea or a suitable location. The location of this road will create significant noise and disturbance and it will also affect the visual amenity of Residents. Dust from this access road will create a poor air quality for residents and the village to the East of the Mine access road.

I also cannot find in the EIS a description of the proposal for a crossing over Lawsons Creek at Keoville. What are the impacts to the creek because of the new crossing? The current crossing is a low-level concrete deck. During peak flood periods this crossing is impassable. What does the proponent plan to do during times of flood if the road is impassable?

Solutions to the problems associated with this access road would be;

- Move the access road away from neighbouring residents.
- bitumen the road along the entire route from the junction of Lue Road to the Mine site.
- Two lane bridge over the current railway line to assist traffic flow.
- 2 lane bridge over Lawson's Creek. During wet times you will not get to the mine otherwise.
- maximum 80-kilometre speed limit enforced on the road once it has been sealed.
- no engine brakes permitted within 5 km of Lue village. Signage installed.
- Trees planted and maintained and shielding to be installed to prevent vehicle lights shining into people's homes and improve the visual amenity of residents.

The notion that the relocated Maloneys Road be 100km zoned and not bitumen sealed is not suitable. The report fails to explain why Maloneys road would not be sealed other than that it cannot be economically justified. I understand the viability argument, but residents must be considered or compensated.

I can also confirm that there has been poor consultation with neighbouring property owners regarding the relocation of Maloneys Road. Diagram on 11-85 shows the bridge across the railway line and the access road to be within meters of neighbouring boundaries. My mother owns the property to the west and has not been consulted.

During construction, the report depicts up to 83 vehicles turning right from Maloneys road to the mine access road. This constitutes a massive increase in the current traffic movements that are not consistent with previous tables. This represents 1992 vehicles turning into the mine over a 24-hour period. Is that correct? I would presume they would leave again. This would equate to 3984 traffic movements per 24-hour period on a dirt Maloneys Road and they would all use Lue Road.

I totally object to the notion that Maloneys Road be an unsealed road

#### **Lue Road.**

As the Current Captain of the Lue/Havilah Rural Fire Service (an active member of this service for 35 years) and a long term resident and Landowner, I have witnessed a significant number of Motor Vehicle accidents and fatalities on Lue Road in my life. Lue Road is the only access road to Lue and the proposed Bowdens Mine. The lost lives of many are a stark reminder of how dangerous Lue Road is.

My opinion, based on my experience, is that lives will be lost on this road due to increase in traffic from Bowdens Mine. There has been poor consultation with residents or Landowners over Lue Road. I have spoken to Council and there has also been little consultation with them over Lue Road.

Lue Road extends from the town of Mudgee to the West 30km to Lue then a further 19 kms where it intersects with Bylong Valley way 4 km on the northern side of Rylstone.

- Lue Road is particularly winding as it meanders its way along the Lawson Creek Valley floor.
- There are several narrow cuttings, narrow bridges, crests and dangerous corners.
- Lue Road also crosses the Lithgow to Gwabegar Railway line just the West of Lue.
- A significant safety issue arises on Lue Road due to its East to West direction. Sun.

Page 11-28 EIS declares Lue road as an approved B Double Road. This depicts Lue Road as a wide and suitable passageway. I can share with you that, Lue Road may well be approved for B doubles however the ruling would have been made to assist local farmers with cost effective transport solutions, especially during times of drought. The only B doubles using Lue Road in the past have been farmers gaining delivery of fodder from significant distances away. Lue Road is by no means suitable for regular B double transport. Approximately 6 km of the route from Lue to Mudgee has no white line edge. B doubles travelling along the road would not be capable of not covering the centre line all the way. The number of B double trucks currently using the Lue Road is not covered in the EIS report.

Page 11-64 4.2.5 declares that B doubles will use Lue road Monday to Saturday hauling two sealed containers of 22 tonne each. The regular use of a 44-tonne payload on Lue road is out of the question. The report declares 682 loads of concentrates per year. That will not occur on Lue Road without serious safety concerns and I would challenge the report to physically demonstrate a B double driving down Lue Road and staying on its side of the road for the duration of the road. I assure you that it is not possible in its current state.

The report goes on to compare Lue Road with other roads in the area such as Ulan Road. Ulan Road and Lue Road are chalk and cheese. There are few, if any similarities. Ulan has had considerable public money spent on it recently.

Lue Road.

- Lue Road travels through many areas of wildlife habitat. Kangaroo and Wombat populations are heavy in the area.
- Many locals choose not to use Lue road in the dark unless necessary. These hazards coupled with the condition and nature of the road make it particularly hazardous at night.
- Lawson Creek Valley is prime grazing land. The Historical Properties of Monivea, Lue Station, Ravenswood, Havilah North and Havilah bound Lue Road. Farmers and graziers often cross Lue road with livestock and escaped livestock are often witnessed on roadsides. The Renown "Coffin Creek Angus Stud" operates on both sides of the road at Havilah between Mudgee and Lue. The largest agricultural property in the area "Lue Station" also operates on both sides of Lue Road. Livestock are taken across Lue Road on a regular basis.
- Many kilometres of Lue Road remain without adequate width for trucks, wide loads or increase in traffic.
- There are 5 bridges over the Lawsons Creek between Lue and Mudgee. The Havilah Bridge was upgraded some years ago. Scotties Bridge, the location of a fatality of young Scott Oliver in 2001 has not been widened and the approach remains difficult. The Quarry Bridge, with its nasty swooping approach and narrow width is particularly hazardous. Gawthorne Bridge (the closest to Mudgee) is on a sharp bend, Gawthorne bridge is the location of many incidents over the years.

- Railway Crossing 6km West of Lue. Although the line is closed and significant work has been carried out over the years, the Railway crossing at Lue remains an extremely dangerous corner as it has a difficult bend on the Eastern side. I was present at a nasty accident there late last year in 2019 where a local woman rolled her car at the crossing on the way to pick up her children from the school bus. Fortunately, she was okay, she was incredibly lucky not to have sustained serious injury or death. The EIS report failed to identify Lue Railway crossing as a potential hazard or black spot. I can recall at least 5 accidents here in the past few years.

The EIS report indicates the reason of speed to be responsible for accidents on Lue Road. I have noticed this because of impatience on Lue Road. As I mentioned earlier, Lue Road is narrow and winding, there are few places for overtaking. There are only one or two safe places where one might overtake a truck on the entire 30 minute route from Lue to Mudgee. If a B double truck is travelling on Lue Road the chance of overtaking it safely is remote. This encourages risk taking and is one of the major causes of road accidents in Australia. Prompting the Yeh! Nar! campaign. A comprehensive study of the risk taking must be completed prior to further increase in heavy traffic on Lue Road.

Finally, dangerous roads coupled with increased traffic loads ultimately lead to more accidents. There is little in the report about consultation with local Police, Ambulance, or the front-line volunteers of the RFS. The RFS is of special concern as they are first responders. There are no Police or Ambulance in Lue. The RFS are volunteers and Lue/ Haviilah RFS are only a small Brigade. There must be consultation with the local RFS about the preparation and support due to the probable increase in MVA incident.

## **Part 13 Aboriginal and Historical Cultural Assessment.**

I am genuinely concerned about the scope and detail of the report.

An example is explained on the introduction page 13-9 that a Rock Shelter with Rock art is described from records from 1899.... but could not be identified.

There is a simple reason why it could not be found. They did not ask anyone! The people listed that were consulted in the report do not come from Lue. Yes, they may be Aboriginal, but they do not live here. Aboriginal culture was not recorded in libraries and books, it is recorded by word of mouth. If you have not been in Lue for a hundred years, the system fails. Sadly, the Aboriginal people were moved out of this area long ago by white settlement. As a white man with heritage back to early settlement I am not proud of how the early settlers treated the Aboriginal people. However, they are not forgotten here at Lue and although there are few aboriginal people residing in the valley, their culture is cherished, we will protect and honour them. Past, present, and emerging. The locals know the sites and places of significance. I have been on many exploratory trips in the local area and have seen some of these sites firsthand.

Lue was a significant place for Aboriginal people. Known as Loowee or Louee or now spelt Lue this is the Aboriginal word for "chain of waterholes" the Aboriginal people thrived in this valley. This is not

even mentioned in the EIS. I am unclear on what they studied in the EIS. The report reads like it was copied and pasted from another mine report.

To the North of Lue, Aboriginal sites are plentiful, and they stretch right across the proposed mining area. All someone had to do to find them was ask a local. Sadly, this is typical of how Silver Mines Limited have undertaken many of their studies. They do not talk to the locals.

It took me a couple of days to find the site recorded as not being found in the report on page 13-9. 25 Miles from Lue is "Hands on Rock" at Ulan. Another couple of days and I found two other rock art sites that are not recorded. I explored those sites with Waraduri CEO, Brad Bliss on the 27<sup>th</sup> of July 2020. We found undocumented hand paintings on the edge of the mine footprint. These sites have now been identified and logged.

I suspect there are more significant sites in and around the proposed mine. I have spoken to some locals but there is still a level of apprehension around announcing sites due to land rights issues. I am working through some of these problems and trying to find middle ground. This is a time of healing on both sides. Let us hope it comes sooner rather than later.

This was a significant place for our first people. The area is rich, the mine area has been poorly surveyed. Bowdens have run rough shod over this section of the EIS. It is a disgrace to the Aboriginal people and the people of Lue. Most of us have had enough of this kind of treatment to our first Australians and with them I object to the Report.

Places of Historical significance also hardly get a mention in the report. The Historical Monivae the original home of William Walker who settled here in 1821 and Havilah built by Nicolas Paget Bailey in 1823 are not mentioned. My home at Lue Station, built in 1915 seems to get a mention.

There is no consideration given into the report of the many families that have lived in Lue for generations. I will not mention these family names in this submission, but there are many families that have resided in Lue for several generations. There is nothing in the EIS about these families or their heritage value. It seems some old hut that nobody knows about can get a mention in the EIS but a family that has lived in the valley for 140 years and will be adjacent to the proposed mine is forgotten. Poor show. These families have worked hard to develop and preserve their local community and its heritage. They have paid their taxes and rates and contributed heavily. This mine will impact on the local heritage and change Lue. These issues must be considered.

## **Part 7. Human Health.**

Is there anything more important than Human Health?

The Human health report in the EIS does little to alert or inform the readers about the potential dangers. Seemingly happy to paint a picture that everything will be okay.

The reality is that the Bowdens Mine will be constructed and will surround the Northern boundary of the community of Lue only 2kms away. Any person that visits Lue will soon understand the negative consequences this mine will have on Human Health and wellbeing. To suggest otherwise is nonsense. How we address the issues that are presented to us is a challenge.

Page 7-52 of the report indicates the air quality of Lue to be good. Although impacted by

- traffic on unsealed roads
- Agricultural activities
- Louee Motocross
- Small Scale quarry activity.

It is reasonable to conclude that Bowdens Mine will have a negative impact on the air quality in Lue as Bowdens Mine is closer than any of these activities to the village of Lue. Lue is in the valley floor below the proposed mine, waste rock emplacement dumps, processing plant and tailings dam. The dust will settle in the valley and in Lue which is below.

Further, many of us witnessed the horrific dust clouds that consumed parts of NSW during the 2017 to 2020 Drought. Dust from South Australia on the windowsills of Sydney siders. Someone might like to explain to me how dust from South Australia can travel 1000's of kilometres to Sydney but dust from a mine wont travel 2km to the village of Lue?

The EIS claims, Local traffic on unsealed roads is restricted to residents travelling to just a few outer lying homes. They are a far cry from mine vehicles including heavy trucks travelling at 100km per hour on the proposed unsealed realigned Maloneys Road just one kilometre to the West of Lue or massive machinery moving around the mine site. With the prevailing wind blowing from the west.

Additionally, Local Farmers or even Louee Motocross are not digging up the land or blasting, transporting, and dumping millions of tonnes of Lead concentrated rock and ore just 2km from Lue village. Bowdens Mine is closer to Lue Village than farmers or Louee Motocross.

Machinery lists indicate all these areas will be dust suppressed by one water cart. I do not think this is possible.

I read a letter recently.

The adverse health effects of lead are well known. It is a naturally occurring toxic metal found in the Earth's crust. Lead's widespread use has resulted in extensive environmental contamination, human exposure and significant public health problems in many parts of the world. For our safety it has been taken out of paint and petrol in Australia.

The World Health Organisation states key facts on lead poisoning and health:

- 'Lead is a cumulative toxicant that affects multiple body systems and is particularly harmful to young children.
- Lead in the body is distributed to the brain, liver, kidney and bones. It is stored in the teeth and bones, where it accumulates over time. Human exposure is usually assessed through the measurement of lead in blood.
- Lead in bone is released into blood during pregnancy and becomes a source of exposure to the developing foetus.
- There is no level of exposure to lead that is known to be without harmful effects.
- Lead exposure is preventable.'

That's a very sobering list. It is scary that inhaling lead particles or ingesting lead contaminated dust is a real future potential risk for residents of Lue and surrounds including Mudgee.

Lead, silver and zinc occur together geologically. You mine one, you get the trifecta. That is the situation at the proposed Bowdens 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 mining operations.

Is the Bowdens Project worth the risk?

The World Health Organisation continues...'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.' Remember that lead exposure is preventable! The easiest way to do that, is to keep it away from people.

The studies listed in the EIS are "modelling". Whilst monitoring across the region has been carried out, there has been no real monitoring of Dust or noise from activities at the Bowdens Mine. Quite obviously because the mine has not begun yet. This is no excuse for an assumption that things will be okay. There is significant evidence across the globe that Lead mining in this proximity to populations of people has serious detrimental effects on their health. Bowdens Silver present no compelling argument that people in the area will never be affected by this mine. I do not think it is in the interests of the wider community that any person be placed at risk by the Bowdens Mine.

The Lue Action Group have undertaken a comprehensive study of the potential dangers and outcomes from the Bowdens Mine plan. They have concluded that there is serious risk.

Lue is a recognised place where people live and is Mid-Western Regional Council's 5th largest settlement. Hundreds of people live there. Considerable amounts of Public money have been spent there. The Lue Public School, Lue Hall, Lue Recreation ground, Lue Rural Fire Shed, the list goes on. It is not economic or reasonable to move Lue or its people. Bowdens Mine have presented firm conclusions that they will not be purchasing or compensating residents although most of the residents are sure that Lue will change, and Lue residents will have adverse effects on their health. Why would there not be compensation?

### **Mental Health.**

Mental Health in rural Australia is widely documented. Drought, Fires and Flood make rural life in Australia tough. Communities band together in these hard times and we have seen plenty of evidence of community solidarity during the recent Drought and 2019/20 Bushfires. However, depression and suicide are rife in rural areas and continues to be, despite the public effort to prevent it.

In this case, Lue is under threat. It is natural that this would create anxiety.

I find nothing in the EIS of what SVL has done about mental health and the impact this mine has had or will have. Although there are some references to what they may do, the record of SVL's action on mental health speaks for itself. One can only consider that SVL's record in the past be an indication of what they intend in the future. Blind Freddy can see that if you bust up a community it will hurt. If you blast your way into what is a very stable community with families that have lived there for generations, it will hurt. If you attempt to totally change the current way of life, threaten their health and future it will hurt.

It is not appropriate that the mine be involved in the management of the mental health issue. Would you go to the Doctor that gave you the problem to fix the problem? Of course not. It must be someone totally independent that solves these issues. Local Government would be my suggestion. Funding should be made available specifically to handle the anxiety issues at Lue.

I know of several families that have left Lue because of the mine. Some were threatened and forced out, some just ran. This can be devastating to those that remain in small communities like Lue. It's sad and it's wrong. Assistance should be provided now to solve what has already occurred.

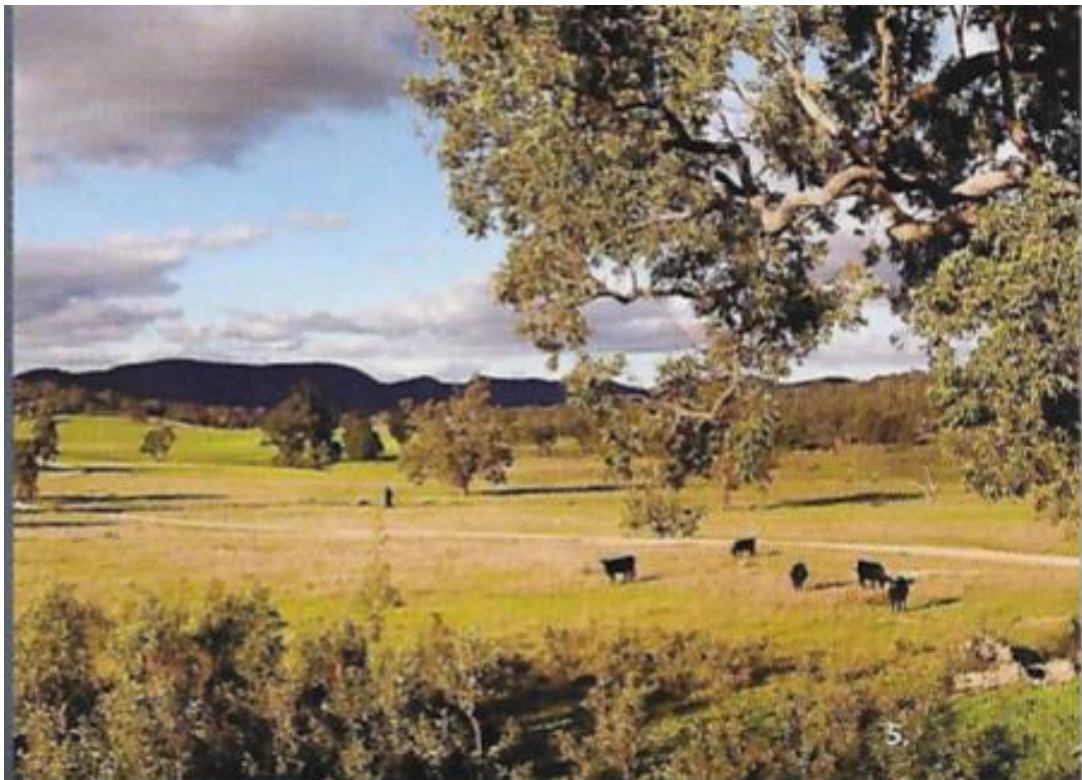
In conclusion, I object to the Bowdens Mine Proposal. Someone will lose their life on a road, someone might take their own life, someone will get sick from lead or some other chemical used or mined. That is wrong and should not happen. No life can be put at risk for such a marginally viable project that will operate for such a short period of time. The mines location puts an end to its suitability. 2km is 2 close. The mine should not be permitted to proceed on that basis, and I recommend you reject the proposal.

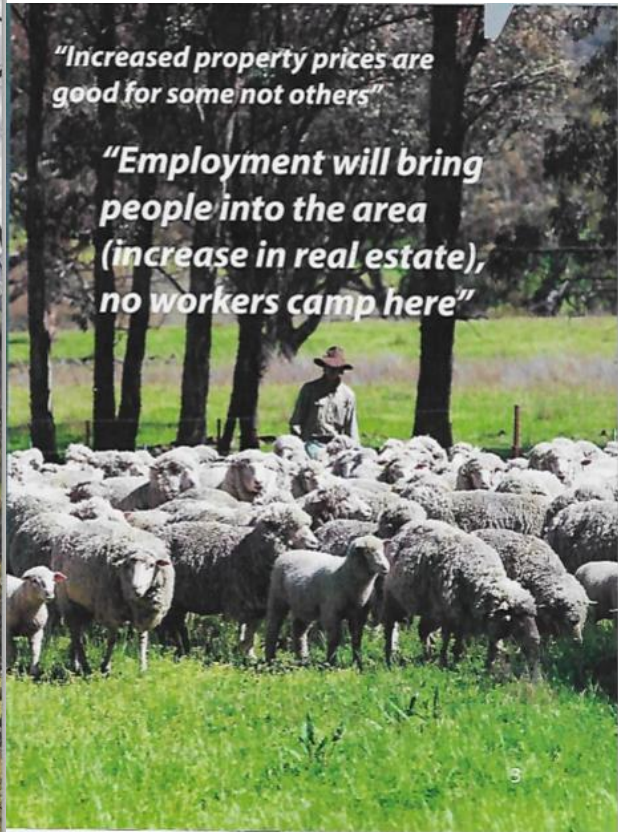
## **Agricultural Impact Statement.**

As the descendant of a pioneer family, the manager of a 5,000 hectare neighbouring farming and grazing property and a history of 140 years of farming and grazing in the Lawson Creek Valley I find it preposterous that Bowdens Silver would claim minimal impact to agriculture in the valley. They have not even consulted with the local agricultural owners and operators. The massive investment made in agriculture in the Lawson Creek valley by the Combes and White families is historic. We are neighbours to the proposed mine.

Livestock Grazing, Cropping, Viticulture, and intensive agriculture such as Olive production and pressing occur in the Lawson Creek Valley.

Further, I have attached a series of photographs taken and presented to the community by Silver Mines Limited over the past few years. These photographs were front page and prominent in the August 2017 "Your Say" project information sheet. The April 2017 Project information sheet and the June 2019 Project information Sheet. Bearing in mind that in the EIS Bowdens declare that the property is "principally low value grazing" I allow the photographs below distributed by Bowdens to tell the true story.







## How is this project different from previous projects?

Bowdens Silver understands the history and issues related to previous projects. Key differences between the Bowdens Silver Project and previous proposals include a much lower production rate, longer economically robust mine life, lower water requirements and no on-site workers' accommodation.

Bowdens Silver is committed to building and maintaining strong community relationships. We welcome your interest in the Project and encourage the community's involvement. Consultation will be transparent and Bowdens Silver will continue to maintain an open approach throughout the engagement process and through the life of the mine.

I find these photographs seriously misleading. Is this a mining company or a farm? Bowdens Silver cannot have it both ways. They cannot depict themselves to the community they are prime agricultural land on one hand and then tell the Government that they are a mining company with low value grazing that will have no impact on the other hand.

## Water.

The amount of water to be used that is listed in the EIS is disturbing. Agricultural properties in the Lawson Creek Valley have been collecting and using water from the valley for centuries. We have never even contemplated using this amount of water. I have many bores for stock and domestic use on my property, Lue Station, and I have seen evidence of surface water drawn down because of pumping from bores. I have witnessed connection of the underground water table to the surface water.

Also, when the current users use water it goes back into the system. It is not lost. Bowdens water will be contaminated and lost. Evaporated and taken away.

I also think the project cannot proceed without significant testing of the water table and its effects on Lawsons Creek. This must be physical testing. Not modelling. I am concerned that the Valley will not deliver the quantities of water that the project requires. If they were to proceed and the modelling in the EIS proved inaccurate, the project would fail and the damage to surrounding landowners and properties would be immeasurable. That is not a risk worth taking without physical testing first. Over a long period.

Further, I think the risk of contamination to the water table and the surface water is too high. If the tailings dam or the waste rock emplacement leaks into the water table or the surface water, there is going to be big trouble. The proximity of Bowdens mine to Lawsons Creek which is a major tributary

to the Cudgegong river is of major concern and the studies conclude that the water table at the mine and Lawsons Creek are interconnected. The mine must not be permitted to impact on Lawsons Creek.

The proposal of a pipeline from the Ulan Coal Fields is a silly idea. I do not think it is smart to take water from one catchment to another. Then destroy that water. There is little detail about the water from Ulan in the EIS and there is a possibility that the water may not be legally permitted to be pumped from Ulan. I know that there are many properties along the pipeline route that object to the proposal. To force these properties to endure the risk of the pipeline would be an injustice.

Water is the key to life out here in the bush and any impact to water quality and quantity must be totally ruled out. Any failure of the Bowdens water plan for the mine will impact future generations, current business, future business, and the environment and will be extraordinarily difficult and expensive to repair.

## **Ecology**

The Lawson Creek Valley is ecologically rich. As recently as July 2020, there was a Koala up a large tree in the back yard of a home right in the middle of Lue. I have seen them at Bowdens. What a pleasure it is to have such an iconic and treasured animal such as Koala in our valley. Numbers are increasing. I do not think it would be a good idea to destroy any Koala habitat and I think most Australians would agree with me. This area is also crawling with Echidna, Spotted Quoll, Platypus, Swift Parrott, and there are many other ecologically important plants and animals in the Lawson Creek Valley. I think most Australians would also agree that it would be a bad idea to destroy their habitat in exchange for this project.

I asked at a recent CCC meeting “what would happen if a duck landed on the tailings dam or an animal drank from it?” the proponent responded with “they’ll only do it once”. I do not think that is an acceptable outcome and I think most would agree with me.

## **Social impact assessment.**

The way in which Silver Mines Limited has undertaken its Social Impact assessment is wrong.

Bowdens Silver employed a local councillor. Councillor Peter Shelly from Rylstone has been a community liaison officer for SVL. Mr Shelley is responsible for SVL sponsorship of local events.

That is wrong, I believe this has influenced the people. Pre EIS donating is Quid pro quo and government must put a stop to this practice. How can you have fair and accurate social assessment with this sort of thing going on? Give people money and then ask them what they think of you? Many people in the community call it “buying the love”. There is no guarantee that once the social assessment has been completed that these political donations will continue. I call them political donations because that is what they are. SVL do not have a cashflow, SVL do not have any income. Philanthropy is generally the domain of those that have made money. Not before.

I also note in the assessment that the question topics are made to look like everyone wants jobs and economics are key. I do not think this is true. If you took all the comments against the project and

put them on one side of the table and all the comments in favour on the other side. Complaints swamp the favourable. If we look at page 17-24 of the assessment and add Health and Well Being, Sense of Community, Decision making, impacts on social Amenity, water, environment, road and traffic, property rights, land use and cultural and now place them next to economic. A quick tally and there are 1200 frequency of responses against the project compared to only 450 in favour. I think the public are far more concerned about other issues than economics. I think 3 times more people are concerned about health and environment than economics.

I also do not believe you can trust a character report completed by the same person that it analyses. I think you will be surprised how many people in the Mudgee Region are against the project. I think People are scared about the impact on water, on Human Health, their property values, and the impacts on their beautiful Mudgee Region. I think that they do not want this type of mine here and I think there will be a major backlash if someone forces them into having it. Regardless of the few jobs it will provide. Mid Western Region already has a strong economy. This economy is driven by Agriculture, Tourism and Mining. MWRC is diverse and I think it wants to stay that way. Most know that Mining is inherently destructive and intrusive. I think Mudgee, and for that that matter, NSW, would love to see less mining. Not more. I think they certainly would like to see less long-term impact mining like what is proposed by Bowdens. Long Term negative Impact with short term gain is not what people want.

I have spoken to local councillors, local identities and the wider community and they tell me that they are dead against the Bowdens Mine. Drive along the Lue road (and others) and see the "Stop Bowdens" signs. This seems obvious to me that this not what people want.

In conclusion, the life span of the Bowdens Project is just 16 years, it will provide minimal benefit to the community or the State of NSW but the detrimental impact and cost on future generations will continue for centuries. The impact from this mine will be intolerable for the residents and landowners during the mine life and is at odds with the current preferred land usage of lifestyle, tourism, and agriculture. This is an extremely sensitive and environmentally valuable area; the ecosystem will be permanently damaged.

I urge you in the strongest terms to reject the Bowdens Mine proposal.

Yours Sincerely,

Tom Combes.