INLAND RIVERS NETWORK

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Major Project Assessment
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Submission of Objection
Bowden Silver mine: Project SSD-5765

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 is lodging an objection to the mine proposal because it has been poorly assessed for long-term environmental impact on water sources in the region.

Main points of objection:

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 take into account increased intensity of rainfall events in the catchment caused by climate change.

Failure of the tailings dam in a catastrophic storm event will cause irreversible pollution of Lawson Creek, a major tributary of the Cudgegong River that feeds into Burrendong Dam.

Lawson Creek has often been a major contributor of inflows to the Cudgegong River and Burrendong Dam when the rest of the Macquarie catchment has been dry.

The economic, social and environmental values of the Cudgegong Valley water source far outweigh any potential economic benefits of the Lue mine proposal. A major pollution event could potentially compromise Mudgee and Gulgong town water supply.

The design of the tailings dam needs to be reconsidered so that it takes into account intense rainfall events greater than 100 ARI. Recent rainfall records need to be considered as well as climate change predictions. Averages are useless for predicting environmental harm caused by extreme weather events.

If approved the mine will be operational until at least 2043 with 30 million tonnes of highly toxic waste sitting in the tailings dam.

The assessment of impacts on aquatic ecology refers to accidental release of poor water quality. This mine proposal has a very high risk of causing irreversible pollution of waterways.

2. Groundwater impacts

The proposed drawdown of regional groundwater over a 200 year period 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.

4. Water Pipeline

IRN does not support the proposal to pipe waste water from coal mines in the eastern Hunter catchment into the Murray-Darling Basin. Lack of water security is a key issue for this mine proposal.

Other mining projects in the region have proposed pipelines from these coal mines or have had pipelines approved. The approved Cobbora Coal Mine near Gulgong initially proposed a water pipeline from the Ulan mines and then changed to a high security licence from the Cudgegong River.

In the most recent severe drought, many mines in Central West NSW experienced major water shortages. The outcome of this is more licences acquired from productive agricultural enterprises and risks to town water supply of cities the size of Dubbo to keep mining operations supplied with water.

Water scarcity is a key issue in a drying climate, combined with larger, more intensive storm events. The placement of the proposed Lue mine near Lawson Creek is a high risk that has not been adequately assessed or mitigated.

Conclusion

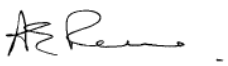
Water-sharing in the Murray-Darling Basin and Macquarie catchment is a hugely complex issue. Mining is an intensive 24 hr/day water user creating significant land and water use conflict.

Central West NSW has more mining projects than can be supplied with water during major droughts.

This limitation must be given greater consideration when assessing the impacts of this mine proposal.

IRN recommends that the Lue mine project not be approved because there is no certainty of a water supply for 23 years and there is high risk of major pollution impacts in perpetuity.

Yours sincerely



Anne Reeves
Hon Secretary