



Nature Conservation Council

The voice for nature in NSW

25 July 2020

Ms Rose-Anne Hawkeswood
Major Projects
NSW Department of Planning, Industry and Environment
Via email: rose-anne.hawkesford@planning.nsw.gov.au

Dear Ms Hawkeswood

Submission regarding the Environmental Impact Assessment for Bowden Silver mine, Project SSD-5765

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 150 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC Member Groups are opposed to the proposed Bowdens Silver Mine, State Significant Development No. 5765. We support our members in their objections to this project and believe these concerns require further investigation and explanation. The risks posed by this project need to be addressed by the proponent.

Our members and supporters question the completeness and adequacy of the Environmental Impact Statement (EIS) provided by Bowdens Silver. The EIS fails to address the threat of acid mine drainage (AMD), yet does not rule out its occurrence as a result of operations. We refer to the submission by environmental scientist Dr Haydn Washington for detailed assessment of the relevance of AMD to this project.

AMD is directly associated with heavy metal mining and is one of the biggest problems facing environmental health in Australia and the world.^{1 2} AMD threatens the quality and safety of water supply during the proposed mine's operation and beyond its operational life. The impact on pH levels on the nearby Lawson Creek, along with resident gilled animals, most plants and the ecological communities beyond would be disastrous. Lawson Creek flows toward Mudgee.

¹ Engineer Australia, 2019. 'Acid Mine Drainage - Causes, Consequences and Remediation' Available at: <https://www.engineersaustralia.org.au/event/2019/05/acid-mine-drainage-causes-consequences-and-remediation>

² Earth Science Australia, 'Acid Mine Drainage'. Available at: <http://earthsci.org/mineral/mindep/acid/acid.html>



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This is particularly concerning given the 14 fauna and two flora species listed under the NSW Biodiversity Conservation Act (2016) and Commonwealth Environmental Protection and Biodiversity Conservation Act (1999) that inhabit the proposed mine site. The EIS also lists several threatened species located close to the proposed mine site. These species depend upon a functioning ecosystem and access to clean water. Koalas have been recorded within the disturbance footprint; a species flagged as likely to be extinct well before 2050 should destruction of its habitat continue at the current rate.³ The squirrel glider and regent honeyeater are noted as likely to call this site home. The EIS states that the regent honeyeater would be significantly impacted by the project, even in the absence of a realistic appraisal of the impact of AMD.

Bowden Silver's failure to discuss the risks posed to communities and biodiversity affected by the proposed project is unscientific and unethical. NCC reiterates the concerns of the community expressed in the submission by the Lue Action Group. At a time when Australia's biodiversity is declining at an unsustainable rate,⁴ this is unacceptable.

Recommendation: This project should be rejected.

Your key contact point for further questions and correspondence is Jacquelyn Johnson, policy and outreach coordinator, available via jjohnson@nature.org.au and 02 9516 4888. We welcome further conversation on this matter.

Yours sincerely,

Chris Gambian
Chief Executive
Nature Conservation Council of NSW

³ NSW Legislative Council Portfolio Committee no. 7, June 2020, Report no. 3 Koala populations and habitat in NSW, Available at: <https://www.parliament.nsw.gov.au/lcdocs/inquiries/2536/Koala%20populations%20and%20habitat%20in%20New%20South%20Wales%20-%20Report%203.pdf>

⁴ Samuel, G. 2020. Interim Report of the Independent Review of the Environmental Protection and Biodiversity Conservation Act. Available at: <https://epbactreview.environment.gov.au/resources/interim-report/executive-summary>