

27TH July, 2020.

Re: SSD-5765: Bowdens Silver

Thank you for this opportunity to make a submission with respect to the proposed Bowdens Silver project.

I object to the proposal.

Background

By way of context, I was a resident of the nearby Bylong Valley for 15 years (from 2001 until 2016), during which time I witnessed there the social damage wrought on a village community by a mining proponent by means of land purchases made well ahead of the approval of any project. I have seen the same happen in Lue over the past number of years.

At the same time, my particular interest in the potential health impacts of lead-related pollution stems from my own childhood, having grown up and attended school in the immediate vicinity of what was then the Sulphide Corporation's zinc and lead smelter at Cockle Creek in Lake Macquarie. I well remember the program of testing that we underwent as children to check for elevated levels of lead in our blood. While the process giving rise to that pollution (smelting) was obviously different to what it will be at Lue (open cut mining), the common thread is the brutally toxic nature of lead.

I now own property in Kandos and am concerned for a development such as Bowdens at Lue with all the impacts that will entail.

Basis for Objection

My objection relates mostly to two major issues:

- Acid mine drainage
- Flow-on impacts from the sourcing of water from mines in the Upper Goulburn catchment.

Acid Mine Drainage

I have had the benefit of reading Dr Haydn Washington's submission regarding the project and agree with his assessment that the EIS lodged is scientifically inadequate and seriously underestimates the threat of acid mine drainage impacting Lawsons Creek. Dr Washington's critique is quite detailed in this regard and there is nothing for me to add separately, other than to echo and reinforce the criticisms made.

Flow-on Impacts of Sourcing Water from the Upper Goulburn

I have also had the benefit of reading the submission by Dr Julia Imrie regarding the project's water impacts.

The project relies on sourcing up to 5.5ML/day of water from coal mines on the headwaters of the Goulburn River, a geographically distinct catchment with an eastern fall.

Leaving aside potential issues surrounding the legality of trading water outside the catchment area, along with the issues attending the construction of the proposed pipeline (including, not least, likely

landholder resistance) the diversion of this water from the Upper Goulburn will be especially destructive in times of low flows (drought). Maintenance of baseflows in the Upper Goulburn is a critical environmental need which, in theory, should take precedence over other demands. In practice, periods of drought will be precisely when the Lue mine will require water the most. That the already vulnerable Goulburn should be subjected to further losses (and critical endangerment) by such out-of-catchment demand is unacceptable. It is critical in this context to understand that the water involved is *not* simply “mine wastewater” but includes, inextricably, water from fresh groundwater sources.

Other Concerns/Issues

Apart from the key issues outlined above, I would like to mention just a couple of other concerns. I am sure that others, more expert than myself, will have commented on these. I wish here merely to add my voice to those who might also have raised them:

- **Proximity to Lue Public School:** The project is only 2km from Lue Public School. The WHO doesn't recognise any “safe” level of lead exposure, noting it is a cumulative toxicant and particularly harmful to young children.¹ What guarantees are there of no incremental harm to students over the long term, especially in the case of any unexpected outcomes?
- **Lack of evaluation of traffic movements along the Bylong Valley Way:** Page 11-13 of *Appendix Part 11: Traffic and Transport Assessment* indicates that “(p)roduct despatch to Newcastle would use *semi-trailers* which would travel via Ulan Road north of Lue Road to access Golden Highway and New England Highway” (emphasis added). If semi-trailers are being used (rather than B-doubles), it seems illogical for movements to go via Ulan Road when the route via the Bylong Valley Way – where semis are allowed - would be some 80km shorter. Likewise, movements of other vehicles along the Bylong Valley Way to Newcastle do not seem to have been taken sufficiently into account.
- **Use of “Coaster” buses to transport workers:** Anecdotally at least, reports are that attempts by other mines in the region (Ulan, Wilpinjong, Moolarben) to ensure a significant proportion of workers at their sites are carried by bus have been only modestly successful. The stated intention of transporting a significant proportion of the workforce (e.g. approx 50% of the operational workforce²) by bus is welcome. The issue, however, is whether this goal is achievable and maintainable, and what guarantees can and will be made by the proponent in this regard.

Yours sincerely,

CRAIG SHAW

¹ <https://www.who.int/news-room/fact-sheets/detail/lead-poisoning-and-health> (accessed 27/7/20)

² See Table 22 in Appendix Part 11.