

4th April 2022

Dear Sir/Madam,

The purpose of this letter is to object strongly to approval of the Bowdens Silver Project (SSD 5765) – Request for Water Supply Amendment.

I regularly visit my friend's cattle grazing property at Lue and am surprised at the lack of professional behaviour by Bowdens Silver in failing to adequately plan the supply of essential resources such as water and power for their proposed mine.

Bowden's initial EIS submission included a 58.5km water supply pipeline from Ulan to Lue, however this supply has apparently failed because they overlooked the basic step of gaining the approval from Ulan Coalfields and relevant authorities.

Bowden's recent request to amend the water supply, is now proposing that the required water can be obtained from the mining site itself reflects the same lack of planning and forethought according to the report provided to the Lue Action Group by water expert Shireen Baguley (see the points extracted from her report below).

Lawson Creek is identified in the NSW Stressed Rivers Assessment to be in the most seriously stressed category (S1) – with the highest level of environmental stress as well as a high extraction rate. Most of the times I've seen it, the creek has been a series of water holes with no visible flow, so it seems inconceivable that the additional water needed to operate the mine could be drawn from the local landscape without seriously impacting local and downstream farmers.

Further, Bowdens attempt to 'get by' by recovering and recycling more water from the tailings dam and leachate dam are very likely to increase the health impacts on the local community, animals, and environment. Recovery of this water will clearly reduce the water levels in each dam, exposing more toxic elements in the soil (lead/cadmium/cyanide) to wind events, which will spread these compounds further afield.

Given Shireen Baguley's findings, it's clear that if this mine is approved it will often be a heavily water-challenged operation, and accordingly Bowdens will be less able to undertake dust-mitigation activities such as spraying the roads, resulting in more dust movement into the local environment, especially during dry times and droughts when dust is at its worst.

Finally, Bowdens water amendment makes clear that their groundwater licenses have been purchased in the Sydney Water Basin catchment as well as further downstream in the Murray Darling catchment. The Sydney Water catchment is clearly not relevant to western waters and the NSW government has historically indicated a preference not to move licenses upstream within the same catchment. Reason being that the water is less likely to be available high up in the catchment and will consequently disadvantage local people and farmers reliant on that water.

Points extracted from Shireen Baguley's report include:

- "The Bowdens surface water assessment data appears to show a monthly average that exceeds 75mm over summer. This is incorrect..."
- "Many of the other months are also too high when compared to Mudgee and Rylstone rainfall statistics from BOM."
- "The number of very low rainfall years that has been experienced in this region is not reflected in the Bowdens surface water assessment annual rainfall data."
- "The surface water assessment reports the average annual rainfall as 673 mm/a.... An average annual rainfall of 654 mm/a would be a more realistic estimate."

- “The analysis here shows that one in every five years, the climatic conditions between Rylstone and Mudgee, which covers the proposed mine site, are semi-arid. This means that any loss of available water in these years severely impacts the land, and the people, plants and animals trying to survive on it.”
- “It is highly questionable that 740 ML/a of rainfall and runoff would be available as an ‘inflow’ in a low rainfall scenario.”
- “Further, the sensitivity analysis appears to be fundamentally flawed... It is considered that the reasons for this are that a true assessment of the low rainfall and runoff’ would show that there is insufficient water to meet the proposed mine’s water demands for an unacceptable duration.”
- “...the assessment attempts to quantify the loss of water to the downstream catchment, stating there would be an average annual loss of flow of 177 ML/a. This assertion is misleading as it relates only to the estimated flow from within the ‘containment system’ and overlooks the fact that the water requirements for the whole project are being drawn from within Bowdens land, both that within the ‘containment system’ as well as the Bowdens contiguous land holdings. The mean annual flow is 1,955 ML/a comprised of 965 ML/a surface water and 990 ML/a ground water.”
- “...this would equate to a loss of flow from 10.9% of the Lawsons Creek catchment. It is an enormous and unsustainable impact on the water resources within this catchment and a significant impact on all land downstream of the proposed mine site.”

I strongly encourage DPIE to reassess the ‘facts’ and assumptions in Bowdens Water Supply Assessment and if confirmed to be questionable or overly optimistic to not approve progression of this mine.

Yours sincerely,

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