

99 Louee Street,
Rylstone NSW
20 July 2020

The Minister for Planning NSW,
Parliament House,
Macquarie Street,
Sydney NSW 2000

Dear Sir,

SSD 5765
Bowdens Silver Mine Proposal, Lue NSW

I am writing this submission to you to request that you reject approval of the above proposed mine.

Whilst I have a number of objections on various subjects I am restricting my submission, here, to the Ramboll report on Air Quality.

Let me say at the outset that matters NOT included in the report and matters of fact that are WRONG are disturbing. If approval were to be given to a proposal on such a limited study it would reflect very poorly on the diligence of the NSW Planning profession. Dare I say that if political interference were to override logic then put Eddie Obeid back in the chair!

You may gather that I live in Rylstone and that my concerns are not the immediate impacts of a mine on my adjoining fence (such as noise, light and blasting). They are, however, about mobile and contaminated dust being created by a mining venture and sent by nature (prevailing winds) to my backyard (my village of Rylstone).

Firstly, the process is not fair, it's not honest and not reliable and it favours entirely the interests of the proponent (because they pay the consultants fees to have the power to adjust truth and reality); it spits in the eyes of the people who happen to have lived in a locality where nature created a resource of some value on the LME, and the ASX. The point is that all of the consultant reports will be found to be biased in favour of the proponent, because he briefs and commissions them.

The only hope the community and the environment have is by appealing to you; please address the real facts with objectivity and the wisdom that their futures deserve...and that's way beyond a 16 year mine life.

The Air Quality report raises issues in a formal and somewhat learned-looking way. But it's what has been omitted that raises concern. Why for example does **visibility** not get a mention? Your

Department's division of the Office of Environment and Heritage issues warning of poor visibility from the Orange Office. That Office is 150 kilometres from here and it advises me of 'reduced visibility' due to particles. This proposed mine is a mere 20 km from this village and we're down wind from a dust-generating proposal; does the OEH care?

The OEH standard of 2.1×10^{-4} over a metre is the alert level Nephelometer reading. The Bowdens/Corkery/Ramboll report makes no reference to this as a study or environmental parameter. Why not? They certainly won't institute warnings of the same standard; why not? It needs to be mandatory. If Bowdens were to install Nephelometers on the mine boundaries at the four points of the compass and at any time the OEH standard was exceeded all dust creating work would cease, we could be a community with some comfort.

The Bowdens/Corkery/Ramboll report clearly aims to confuse. And by confusing confound the impacted public/community (the Koalas and Regent Honey Eaters can't read anyway!). Different measures and units are used for much the same items. Micrograms per cubic metre one moment then a change to parts per million and then grams per square metre. Standardised nomenclature should be mandated by your Department. Also the particulates are only sometimes defined: PM 10 and PM 2.5 and TSP, yes, but they also use 'dust'; what in technical terms is dust, it's not on the acronym list and Bowdens/Corkery/Ramboll don't define it?

In the technical area Ramboll uses computer models to create the theoretical outcomes of mining operations notably 'dust'. Of the three main models used the parameters applied are shown, OK, but they are not explained and certainly not justified. Ramboll has no doubt fudged the books to get a good result for their client Bowdens. In such a technical area they know that they will win by use of jargon very few people are equipped to argue the point. The so-called peer review is so shallow and sycophantic that it means nothing and adds nothing to the veracity of the Ramboll issue.

A fair amount of report space is taken up explaining and describing recorded and local winds. They are barely relevant except for some local properties and respective VLAMP matters. Ramboll contends that winds come from strange directions and says that the winds '...are strongly influenced by local topography and display significantly different wind direction patterns.' These winds are micro climatic using two local anemometers to predict regional patterns. This is totally flawed logic. Figure 4.5 (a CALMET modelling of a puff of wind is wrong and misleading it should not be used in this context), the last paragraph on page 2-36 explains how they got it wrong. The big picture is regional prevailing wind. Those winds are largely westerly and north westerly ie blowing from Lue/Bowdens dust-creating development to Rylstone, Kandos and Clandulla.

Some of the most misleading and dishonest documents produced by Ramboll are the PM2.5 and PM10 contours. Produced by one or other of Ramboll's models these are in complete denial of the regional winds. By the way where are the TSP contours?

On the top of Ramboll's omissions from the report is any reference to the potential migration in the air (wind-assisted, particularly) of fine particulate matter. PM2.5 can stay air borne for days and weeks and travel hundreds or thousands of kilometres. Bowdens/Corkery/Ramboll will not mention it or admit it; it is not mentioned. Section 5.4 should pay some respect to distribution. The only reference to distribution are the yet-to-be-discredited PM 2.5 and PM 10 contours. Wider regional travel is known about but for Bowdens/Corkery/Ramboll it's the inconvenient truth.

Clearly dust from the proposed mine site will arrive in this village. Ramboll indicates that about 150 tonnes of dust will be released from the mine site each year; most will come in this direction (towards Rylstone etc). The community here will be sitting ducks with no recourse for correction; no baseline studies have occurred nor been required by your departmental people. Why not?

My drinking water is harvested from the roof, residents of Lue likewise and they have no other option. For Lue residents Bowdens/Corkery/Ramboll have allowed themselves to add an extra 2 grams per square metre of 'dust' resulting from operations per month. A portion of that dust is lead. On a 100 m sq roof that's 200 grams a month or about 2.4 kg per year. It **will** concentrate in the gutters and it will contaminate drinking water. This is a potential poisoning event which can be prevented.

Bowdens/Corkery/Ramboll are careful to separate the data to make assessment difficult. For instance let the reader assume that there is *dust* (it is mentioned by Bowdens/Corkery/Ramboll which includes larger particles as well as TSP. And assume TSP is made up of greater than PM 10 particles then PM 10 then PM 2.5, no breakdown of proportions is given but it should. For ease let's say it's an equal distribution (25% big particles, 25% greater than PM 10, 25% PM 10 and 25% PM 2.5). (Bowdens/Corkery/Ramboll may wish to respond to this and provide reliable figures). Table 6.1 indicates site generation of only PM 10 and this amounts to between 200 and 150 tonnes per year. If the other dust fractions are included (based on my distribution model) then between 600 and 450 tonnes of dust will be created and released by mining operation and wind. Up to 12 tonnes a week.

Table 7.6 gives a strong smell of being totally fake. Virtually all the properties in Lue have the same amount of dust deposition! Yet Bowdens/Corkery/Ramboll contrive dust deposition maps that wiggle a lot to suggest a detailed response to terrain and meteorology.

Dust control plans (haul roads) mentioned in Table 9.1 are ineffective and virtually useless. *Visual monitoring* means a mine manager pokes his head out of the window; he can't see dust because he's paid a bonus for every tonne of ore mined!. *Call for additional...watering* this seems to mean little. Haul Roads are just one component.

How do Bowdens/Corkery/Ramboll propose stabilising the surface of the TSF? It is two hundred acres of powdered crust with sludge beneath probably not truck trafficable; Bowdens/Corkery/Ramboll estimate wind erosion of between 14 and 35 tonnes per year of a very toxic dust which cannot be controlled. That is why Best Practice chart A 4-3 will not make reference to an impossible job. Yet another omission because it's an uncomfortable truth –easier to hide it from you.

Please reject this mine proposal on a permanent basis.

Yours sincerely

Annabel T Combes