

20 February 2023

Independent Planning Commission
Level 15
135 King Street
Sydney NSW 2000

Via online submission form.

To whom it may concern,

Objection to Bowdens Silver State Significant Development

The Nature Conservation Council of New South Wales (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

NCC strongly opposes the approval of Bowdens Silver Mine (the Project). It threatens irreparable damage to the environment, to important ecosystems and endangered species, and to water security and water quality.

The risks posed by this project are way out of proportion with the benefit to be gained for the communities directly impacted or the country as a whole.

We are in a climate and biodiversity crisis. Destroying this prime agricultural area along with threatened species ecosystems, for a 15 year project that will produce toxic waste and leave a destroyed landscape, cannot be justified.

Endangered species and ecological communities will be permanently impacted.

NCC acknowledges that the proponent has attempted to address impacts to important biodiversity and the Department of Planning and Environment has imposed conditions to mitigate the impacts of the project. However, it remains the case that the 457 hectares of land is home to many species of flora and fauna including the endangered Koala, Regent Honeyeater and Swift Parrot, and the Small Purple Pea (*swainsona recta*).

The Project will cause habitat fragmentation and degradation. The pipeline will also have indirect impacts such as mine lighting and noise. This project is one of several that put pressure

on many important species and, if approved, there will be incrementally less habitat available to our unique wildlife.

The Project's proposed protection, management and restoration of Koala habitat is at odds with the NSW Koala Recovery Plan. Securing and protecting their real and current habitat must not be overlooked. The rationale that these impacts have been addressed by a calculation of required bio credits is unacceptable. Koalas are endangered now. Their loss is final. No offset will compensate for the costs to the biodiversity of this area. This alone should be grounds to reject the proposal.

The project proposes unacceptable risks to water.

The following issues must be addressed:

- Bowdens' groundwater assessment considers groundwater availability around the site, but no peer review has been conducted on groundwater contamination risks from dangerous chemicals like cyanide and heavy metals like lead.
- There is significant risk of tailings dam leachate bypassing the seepage collection ponds and entering the groundwater system.
- The hazardous nature of substances in the waste rock dump and tailings dam merit a local and detailed model of hydrogeological processes to adequately manage the proposed activity.
- Bowdens' activities will result in a loss of flow from 10.9% of the Lawson Creek. This will have a significant impact on all downstream land and water users.

The risks posed by the Project can be completely and reliably avoided by rejecting it. Refusing this development is a much more secure way to completely evade the damage the mine will cause.

Community impacts now and in the future are significant.

NCC's member groups consist of grassroots community environment organisations from across NSW, including the Lue area that will be directly impacted should the mine be approved. The NCC member group in the region has identified that:

- The conclusions made in Bowdens EIS that people living in Lue will not be affected by dust issues if the mine proceeds is based on insufficient data and underestimated levels



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of exposure. It overlooks concentrate, mined ore materials and tailings as sources of potentially toxic dust. It ignores peak wind events, and relies on out of date guidelines regarding compliance levels for acceptable community exposure in houses.

- No mechanism exists to ensure Lue residents are fully protected from lead particles. They will have to live with the on-going threat to health, particularly in vulnerable younger residents.
- There is no plan to remove or drain the tailings dam once mining is finished. The threat of leakage and of toxic chemicals into the environment will remain for generations to come.

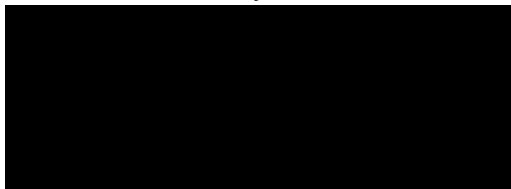
NCC supports the submissions made by the Lue Action Group.

Recommendation: That the IPC reject the Bowdens Silver Mine project.

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is Jacquelyn Johnson, Executive Officer, available via [REDACTED] [u](#) and [REDACTED]. We welcome further conversation on this matter.

Yours sincerely,



Jacqui Mumford
Chief Executive
Nature Conservation Council