**No Stakeholder Engagement** has occurred with the Lue Residents, existing land users and surrounding tourist operators.

The Generational Landholders, existing businesses and custodians are to be traded for a total 23 year mine life, should this project go ahead.

How can this possibly be justified?

How short-sighted is this?

Bowdens say that they have had an open-door policy. This does not equal community consultation. Sponsorship of events or activities does not equal community consultation. In this instance, it is more consistent with a “modern-day” bribery rather than good corporate citizenship.

**Poor representation of community by Bowdens**

The comments on Kandos made at the hearing by Anthony McClure were particularly distasteful, that “Kandos has issues.” In his account of the statistics, he failed to mention that 41% (2021 census) of the population are over 60 years. It appears that Anthony McClure has manipulated the statistics to cast a bad light over local communities, particularly Kandos, and that Bowdens employment opportunities would somehow solve these. Significant areas of health and socio-economic status are a legacy from the last mining venture – the cement works. Since its closure, health conditions, resulting from particulate matter pollution, has actually improved. The Street scape has had enhancement. Kandos has transformed itself into a budding Art and Culture centre. Cementia, an annual art & culture festival, celebrates this. Real-estate values have increased with people making a tree-change. A strong community is forging greater diversity and security. A new mining venture, may provide a few people with more disposable income, however, will it change health and social issues? – very unlikely. Employment opportunities already exist, therefore, I suggest the “issues” are more complex than Mr McClure’s simple solution of more jobs and more money.

**Employment**

“Jobs, Jobs Jobs,” is the constant mantra we hear from Mining proponents. It is an arrogance that suggests these mining and mine related jobs are more important than any other aspect of life. Currently there are more than 360 jobs available in our region just in the areas of mining and local government alone. Hospitality offers many more. Employment will not be a gain from this mining venture. Furthermore, it creates a detrimental **2-speed economy.**

Adverse side effects have been seen previously, by many local businesses that were not directly involved in mining or mine related activity. Significant challenges are placed on these businesses from competition with mines and mine related business for staff, skilled labour, and trades people. Mines offer higher wages and local businesses lose staff to the mines, long waiting lists grow for essential repairs and maintenance work to be done. It becomes a 2-speed economy. Additionally, an expectation to pay “mine rates” to get work done develops.

* **Who is the mining company**

Bowdens are seeking approval for an open cut lead, zinc and silver mine which could have serious impacts on our health, our water and our livelihoods. There is no evidence that Bowdens will operated this mine. Will this approval be on-sold and to who? The argument that “it’s better for this hazardous processing to happen here under Australian regulations,” doesn’t serve our country, economically, environmentally, from a health perspective or socially. It flies in the face of what we know to be true.

* **Health** – We have been mortgaging the health of future generations to realise economic and development gains in the present (Whitmee S, Haines A, Beyrer C, Boltz F, Capon AG, de Souza Dias BF, et al.) Environmental pollution contributed to an estimated 9 million deaths and significant losses across the world in 2015 and in fact, *The Lancet* Commission on pollution and health identifies pollution as the largest environmental cause of disease and premature death.

Metalliferous mine dusts and associated potentially toxic elements released into the environment through dust generating mining activities cause adverse health effects to humans. This is especially the case in regions where historic mining has left a significant legacy of exposed metalliferous mine wastes. (Landrigan PJ, Fuller R, Acosta NJR, Adeyi O, Arnold R, Basu NN, et al. 2108).

The World Health Organisation has declared air pollution to be the world’s largest environmental health risk. There are no safe levels of exposure to particulate matter and even short-term exposure can have adverse effects on health.

Our health, our visitor and animal health, and our operation, that is faming and tourism, will suffer because of this mine.

* **Lead** Lead is toxic to humans, and it's a universally accepted fact that there is no safe level of exposure to Lead (World Health Organisation).  Lead is a cumulative toxicant that affects multiple body systems and is particularly harmful to young children. The proponent, Bowdens, suggest that water will be used to suppress the lead dust, however, evidence of an insufficient water resource, especially in times of reduced rainfall, indicate that this will not be possible. This was highlighted bycivil engineering and natural resource management, presenter, Shireen Baguley

Lead is toxic to humans and animals. Modelling detailed in the EIS and relied on in the Department's Assessment Report fails to adequately assess the risk of lead contamination to Lue and surrounding residences, particularly in terms of dust and the adequacy of dust suppression measures on a water constrained mine site.

The mine will be situated approx. 2 kilometres from Lue village and primary school. Clearly, this is unacceptable. The health impacts on the children and teachers makes this untenable.

* **Mental health,** as a number of the medical doctor presenters indicated, it is a highly significant impact to the local community.

Evidence shows that people can experience high levels of anxiety and stress when there is a threat to their region, economic stability and devaluing land values, even at the proposal stage of a mine. Psychological impacts continue with landscape changes, such as those that occur with large scale mining developments. People suffer solastalgia - the distress that is produced by environmental change impacting on people while they are directly connected to their home environment.

* **Lack of Technical detail and supporting data**

After listening to the experts at the three-day IPC hearing, the overriding consensus from experts in their field, was a lack of technical detail and supporting data supplied by the proponent across key aspects of the mine viability and the complex nature and location of the site:

* + **Ground and surface water** - Impacts to ground and surface water will be significant and have not been adequately assessed in the EIS nor addressed in the NSW Department of Planning's Assessment Report. Refer to Shireen Baguley’s Report

Groundwater impacts will be significant for downstream water users, who will have less water to use and face serious risks of water contamination as a result of toxic tailings seepage and/or acid mine drainage upstream. Townships such as Gulgong will have their town water supply at risk of poisoning.

* + **Acid mine drainage (AMD**) Key technical detail surrounding the Proponent's acid mine drainage management is inadequate and unresolved, as highlighted by the Earth Systems review detailed in the Department's Assessment report. Acid mine drainage (AMD) risks would burden the region with a toxic, permanent legacy, in contradiction to principles of intergenerational equity and ecologically sustainable development. There is a substantial disparity between Bowdens statements for AMD management and Earth systems statistical analysis. The tailings dam will leak – there I nothing to stop it. Leakage with toxic impact for future generations. There is no example of the Bowden’s containment designs working at this scale. There is also significant risk of tailings dam leachate which will bypass seepage collection pounds and enter the ground water system. Existing groundwater contouring is not well explained by Bowdens and the fate of leachate if it reaches the water table has not been demonstrated. Time will see the tailing dam fail. It’s not a matter of if, it’s when.
  + **Bowdens Mine is an Uneconomical Proposition.** The Assessment Report excludes any meaningful mention or exploration of the role tourism plays in the Lue and broader Mudgee, Rylstone, Kandos region, and in turn fails to assess the impacts of an open cut lead mine on the future viability and sustainability of the visitor economy and tourism sector. Tourism and the visitor economy represents $170 million to our region and which we are part of.
  + **Lack of Due Diligence by the NSW Department of Planning (DPE)**  A significant cost and burden has been placed on the community with the additional huge costs of employing the IPC to do the due diligence we expect and pay DPE to do. The conditions and assessment report put forward by the DPE are inadequate, and do not impose sufficient controls or protections for the community. There are no penalties for exceedances.

The DPE are tasked with the responsibility to make critical assessments and seek clarity from applicants that answer key issues. “Streamlining processes” to allow for faster approvals, is irresponsible, especially where activities will have consequences in perpetuity. The approval with conditions, given to Bowdens’ Lead, Zinc & Silver mine demonstrates an extremely poor quality assessment. Assessments such as this, bring a distrust to the system and makes one question if corruption is involved.

Current “Best Practice” is now clearly **NOT** good enough. Practice needs to be brought up to date with our current knowledge and expectations of safety, social impact and environmental impact. It is time to make a stand. I, along with many others, ask the Commissioners bring about a lifting of the bar so that mining practises consider appropriately the real impact on people and landscape. The current standards or “Best Practice” are no longer acceptable. Stop the rape and pillage of the land for” critical minerals,” minerals of significance,” “rare earth minerals and their potential economic opportunities.” It seems the state is in a drunken stupor, “streamlining processes” for an artificial and questionable, economic gain. The real costs are being ignored.

* + **Transport Inadequacies/lack of Contingencies/ Risk Mitigation** Mined materials and processing chemicals will be moved as a slurry, by B-Double truck, along the Lue Road and through Mudgee. No upgrade to the road, no procedures for accidents and spills, no mitigation for the risks.
  + **Aboriginal Heritage Destruction** Of the 52 aboriginal artefacts surveyed on the site, 25 will be destroyed if the mine proceeds. A local Wiradjuri Elder asked “How many more funerals do we have to go to?” The trauma to the land, the destruction of songlines, rock shelters and sites of significance. When will this assault stop? Commissioners, please speak with our local Wiradjuri people and please stop the “gag orders by mining proponents.” Gag orders effectively prevent Aboriginal people objecting to destruction of heritage sites.
  + **Rehabilitation** – It is unsatisfactory that this mine has no rehabilitation plan. According to the a report, *The* Dark side of the boom: What we do and don’t know about mines, closures and rehabilitation in New South Wales (2017), by the Australian Institue, adequate funding has not been allocated for rehabilitation.  “The costs of rehabilitating the mines in NSW run to billions of dollars. The public cannot afford to leave this to blindly trust in mining companies, and government departments are not facilitating the transparency this issue deserves.”

“There is no example of a major open cut mine site being successfully rehabilitated in NSW. There are, however, hundreds of abandoned mines in the state, with the NSW Auditor General expressing concern that derelict mines ‘may represent the largest category of contamination liability for the New South Wales Government.’”

While there is a huge financial liability to the state, there is a much greater real cost to our people and our environment. It is prudent of the Commissioners to have Bowdens submit an appropriate rehabilitation program and set aside the funds as a bond for this. If this is done in a meaningful way, and if the economic value presented at the hearing is correct, this mine will not be an economic proposition. Bowden’s economic viability is only such because this cost amongst others has not been accounted for.

**Commissioners, we the people impacted, are asking for fair and just practices. Accurate assessments, with complete detail and data need to be in place before any approvals are sought. The mere fact that several other well-funded proponents have walked away from this proposal should send up red flags. The key issues are the key issues - Whether there is one or one thousand submissions to indicate so.**

* Whitmee S, Haines A, Beyrer C, Boltz F, Capon AG, de Souza Dias BF, et al. Safeguarding human health in the Anthropocene epoch: report of The Rockefeller Foundation–Lancet Commission on planetary health. The Lancet. 2015;386:1973–2028.
* [**https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2022/12/bowdens-silver/public-submission-rounds/speaker-presentations/shireen-baguley--speaker-presentation.pdf**](https://www.ipcn.nsw.gov.au/resources/pac/media/files/pac/projects/2022/12/bowdens-silver/public-submission-rounds/speaker-presentations/shireen-baguley--speaker-presentation.pdf)
* <https://static1.squarespace.com/static/634e0e19427e747fa68763d4/t/636388781600921c6f7a3709/1667467390048/ATTACHMENT+2+-+Baguley+Review+Mar+22+UPDATED+MAY+22+Combined++%281%29.pdf>
* Landrigan PJ, Fuller R, Acosta NJR, Adeyi O, Arnold R, Basu NN, et al. The Lancet Commission on pollution and health. Lancet. 2018;391:462–512. <https://doi.org/10.1016/S0140-6736(17)32345-0> **A landmark paper that reviews of the way pollution affects health.**
* Entwistle, J.A., Hursthouse, A.S., Marinho Reis, P.A. *et al.* Metalliferous Mine Dust: Human Health Impacts and the Potential Determinants of Disease in Mining Communities. *Curr Pollution Rep* **5**, 67–83 (2019). <https://doi.org/10.1007/s40726-019-00108-5>
* World Health Organization. Global Health Observatory: Ambient Air Pollution, available at https://www.who.int/data/gho/data/themes/air-pollution/ambient-air-pollution.