

Bev Smiles

Independent Planning Commission
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**Submission of Objection
Bowdens Silver Project SSD-5765**

Introduction

I have had a long experience with mining assessment, approvals, and operational processes in the Mudgee area with the rapid expansion of coal mining over the past 20 years. I also live on a river downstream of the mining operations and have seen the serious impacts on river health that have been ignored by Government processes.

My community of Wollar has been destroyed by the unassessed impacts of neighbouring coal mine operations that has caused the ongoing acquisition of property over and above that assessed as impacted in project EIS and Department of Planning recommended conditions of consent.

I object to the proposal to mine lead, zinc and silver close to the village of Lue because the assessment process for the project is very poor and will have greater impacts than identified that will not be mitigated by the proposed conditions of consent.

The people of Lue and water users on Lawson Creek have plenty to be concerned about and I give them full support in their objection to this unnecessary mine proposal.

Key reasons for objection:

1. Poor assessment information

I am on the Community Consultative Committees for the three coal mines in the Mudgee area: Ulan, Moolarben and Wilpinjong. I have seen firsthand that the proposal to push important assessment details onto post approval management plans is a recipe for environmental disaster. There is no transparency or independence in the process of developing post approval management plans. It is all done through behind the scenes negotiations between the company and the Department. Once approval has been granted all the focus is on getting the operation going with little regard to ongoing environmental and social compromise.

Significant information is not available in regard to water impacts, volume of potential acid forming material, lining of the tailings dam, water quality, air quality, heavy metal dust migration,

management of increased blood lead levels & health impacts, biodiversity impacts, climate change impacts, social impacts, economic benefits.

As the independent arbiters of this approvals process it is critical that the Commission has all the necessary information to make an evidence based decision. Having essential information pushed back to post approval, as is being recommended through proposed conditions, is not acceptable or precautionary.

A glaring example is the incomplete assessment of the volume of non-acid forming material. The acid mine drainage, water quality and water quantity issues are too important for this project to leave them to a non-transparent, non-independent post approval process.

2. Discharge licences

In regard to EPA environmental protection licences (EPLs), these have been turned off for the Moolarben & Wilpinjong coal mines on a number of occasions including in recent wet weather events because the mines filled up with water. This is because modelling used to assess and approve the projects has not taken climate extremes into account. There is not enough water storage on site to hold flood events. Therefore, the mines are given exemptions to the EPLs and they have been discharging untreated mine water at large volume into the Goulburn River for months.

There has been no assessment or consideration of the accumulation of heavy metals in the Goulburn River over time due to the release of untreated mine water.

The poor assumptions in the project water model in regard to extreme weather events caused by climate change raises doubt about the ability of the mine design being able to hold large flood events.

The project will not be a nil discharge mine and the EPLs will not protect downstream water users or river health. The lack of assessment of water quality in the tailings dam, sediment dams and void is a key failing of the assessment for this project.

3. Poor economic and social impact assessment

The rationale behind creating more jobs does not hold up in the context of the current regional labour shortage. There are more vacancies at the three coal mines in the Mudgee area than the proposed jobs for the Lue Mine. Any local person with the skills to work in a mine already has a job. The economic analysis emphasizing the project benefits is based on poor assumptions and should not be considered to outweigh the extensive environmental and social impacts.

The economic assessment has not analysed the impacts of lack of water supply on operations during a major drought. Climate change predictions for the region are for longer, more extreme dry periods.

The Government funded Central West Orana Renewable Energy Zone has identified key labour market shortages, accommodation shortages, increased demand on services, transport route impacts and cumulative environmental impacts. The large number of renewable energy projects planned for the Mid-Western Regional local government area has not been considered in this mine assessment process for cumulative impact.

The rationale that the current operating coal mines in the Mudgee Region will soon be closing down is incorrect. The NSW Govt has handed out new areas for coal exploration to Ulan and Wilpinjong Mines, Ulan is also planning to expand underground operations to the west, Moolarben also has plans to extend current operations. Coal mining could be continuing until 2050 in the region if current Government policy remains in place.

The proposed Lue Mine will not create new jobs, it is likely to replace existing jobs and put greater pressure on the labour market.

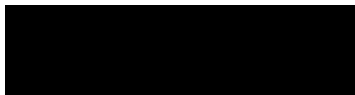
4. More information required

There is not enough information provided to fully assess the environmental and social impacts of this project. The economic benefits are highly doubtful and are poorly assessed. A rigorous cost benefits analysis has not been undertaken.

The proposed conditions of consent will not protect the environment or the community from the scale of impacts likely to be caused by the project.

This project must be rejected on the basis of poor information and on clear consideration of the potential extent of irreversible environmental and social damage.

Yours sincerely

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Bev Smiles

Friday 24 February 2023