

870 Ophir Rd. Orange 2800
email: Ckinross@csu.edu.au



13th April 2022

**Submission Re: Amendment to EIS for Bowdens Silver Project (Lue Lead Mine)
SSD5765**

Dear Sir/Madam

I am lodging this submission on behalf of the members of the Central West Environment Council (CWEC). CWEC is an umbrella organisation representing 14 environmental groups throughout the Central West of New South Wales. Many of our groups have grave concerns about the environmentally inappropriate practices in the Central West employed by the mining industry. The project proposal in question is an example of such practices.

The amendment to the EIS, which is an application for the realignment of the Transgrid 500kv powerline. This proposal is at best the result of poor planning. The EIS has been on public exhibition since June-July 2020. . The proposal to realign the powerline should have been considered then under the part 4 application. To have the realignment proposed as an afterthought is at best poor planning and at worst deliberate manipulation of the system. Additionally, to have this amendment proposed before the release of the assessment report by the Department of Planning , Industry and Environment is highly unusual. It also has the capacity to give the public the impression that the planning process is inefficient and open to manipulation and exploitation.

The proposal to realign the powerline does not take into consideration the impact such an amendment will have on the visual, biodiversity, and cultural heritage of the proposed site.. Our members find this attitude unacceptable. A separate EIS specific to this proposal must be carried out to ensure that due diligence is given to the above considerations.

Although referred to as a Silver Project, the mine produces much more lead than silver. The fact that a large amount of lead is produced questions the sustainability of the mining project. The toxic effects of lead and lead mining are well documented. For lead mining to occur at all there needs to be stringent controls and monitoring of its effects on the local air and water. At present there is no adequate assessment or plan for mitigation of anticipated environmental effects of mining such a toxic substance.

As with most mining projects, there needs to be a tailings dam. It would be reasonable to speculate that a tailings dam for a lead mine would contain substances which would cause widespread environmental damage if they were to be accidentally released. In the case of the Lue Lead Mine, the proximity of the tailings dam to Lawson Creek and its inability to withstand a major flood event could result in dam failure. The result of this could be pollution of key inflows into the Cudgegong River, Mudgee water supply and Burrendong Dam.

For any environmental assessment to be accurate and future based, the current and future effects of climate change need to be carefully considered. New climate modelling has been developed by the NSW Government for the Macquarie Region. Modelling predicts more intense and frequent periods of drought, which will have a significant impact on mining operations. One concern with the Lue Lead mine is that there may not be sufficient water to cope with the control of lead dust in a drought such as that experienced in the region in 2018-2019.

This project has not been assessed using the current climate change modelling available for such assessment. We request that appropriate climate assessment should occur,

Thank you for the opportunity to comment on this proposal.

Yours sincerely
Cilla Kinross
President, Central West Environment Council (CWEC)