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Rose-Anne Hawkswood
Team Leader, Resource Assessments
Department of Planning, Industry and Environment
<https://www.planningportal.nsw.gov.au/major-projects/project/9641>

Monday 16 August 2021

Dear Ms Hawkswood

Submission of Objection: Bowdens Silver Mine – Amendment (SSD-5765)

Central West Environment Council (CWEC) is an umbrella organization representing conservation groups and individuals in central west NSW working to protect the local environment for future generations.

Thank you for notifying CWEC that Bowdens Silver Pty Ltd applied for an amended application for the Bowdens Silver Mine (SSD-5765).

Grounds for Objection:

1. Confusing planning process

We are greatly concerned that the Department of Planning, Industry and Environment (DPIE) did not conduct a thorough check of the initial EIS before it was placed on exhibition. An amendment to a development application during the assessment of submissions stage is highly unusual and very confusing.

We note that this amendment is in accordance with clause 55 of the EP&A Regulation adopted on 16 July 2020.

However, CWEC is not aware of any recent mining applications in the region that have applied for an amendment prior to a DPIE project assessment report being released.

The planning process for SSD applications is getting more difficult for the community to understand and participate in.

CWEC objects to an amendment to the Bowdens Silver Mine (SSD-5765) prior to DPIE analysis of the project as exhibited in mid-2020.

2. Impacts of realigning the 550kV transmission line

The 550kV transmission line between Bayswater Power Station in the Upper Hunter and Mt Piper Power Station at Lithgow is a significant piece of infrastructure that impacts visually and environmentally across the landscape. The issue of electromagnetic radiation from this scale of electricity transfer is of great concern to the community.

CWEC does not consider that the visual, environmental, cultural and health impacts on neighbouring properties have been adequately assessed in the original EIS or in the amendment report on exhibition for comment.

2.1 Electromagnetic radiation

The amendment report identifies the *Guidelines for Limiting Exposure to Electromagnetic Fields*¹ and that the proposed re-aligned transmission line would be constructed according to the guidelines. However, the report does not describe what these requirements are or how they will minimize risks to human health at the properties that the transmission line will move closer to.

2.2 Biodiversity loss

The maps to demonstrate records of threatened species and endangered ecological communities provided in the amendment report are highly inadequate.²

Fig 6.2 does not have an overlay of the proposed re-alignment of the transmission line as in Fig 6.1. It is very difficult to understand the biodiversity impacts as described.

CWEC does not support that the proposed biodiversity offset plan will adequately minimize the loss of critically endangered ecosystems and the species dependent on them.

3. Other impacts of the mine proposal

CWEC lodged an objection to the proposed mine because it will involve the extraction of a much larger volume of lead than silver. The availability of water through intensive droughts, such as the recent 2018-2020 drought in the Central West, has not been demonstrated. This is of particular concern in regard to the management of lead dust pollution on the surrounding environment and community.

¹ Corkery, R.W. & Co. July 2021. Amendment Report – State Significant Development No. 5765 p 27

² Ibid pp 18,19

Recent new climate modelling for the Macquarie Valley has predicted a significant decrease in rainfall and runoff, hotter temperatures and higher evaporation rates. These changes to climate are already being experienced across the region.

All modelling for water requirements for the project must be updated using the most recent climate modelling data.

CWEC outlined a range of key concerns with the mine proposal in our submission of objection lodged in July 2020.

We trust that DPIE will conduct a rigorous analysis of the complexity and shortcomings of this proposed mining project.

Yours sincerely

A rectangular box containing a handwritten signature in black ink. The signature is written in a cursive style and appears to read 'Cilla Kinross'.

Cilla Kinross
President