



Blue Mountains Conservation Society Inc

ABN 38 686 119 087

PO Box 29 Wentworth Falls NSW 2782

Phone: (02) 4757 1872

E-Mail: bmcs@bluemountains.org.au Web Site: www.bluemountains.org.au

Nature Conservation Saves for Tomorrow

12 July 2020

To whom it may concern,

Submission to Planning NSW

Bowdens Silver Project, Lue, NSW

State Significant Development No. 5765

Objection

Blue Mountains Conservation Society objects to the proposed Bowdens Silver Project SSD No. 5765 at Lue. The Society requests that its submission be published in full on the Planning NSW website including our name.

Blue Mountains Conservation Society

The Blue Mountains Conservation Society is a community based organisation with over 800 members. Its mission includes to help conserve the natural environment of the Greater Blue Mountains. The Society's geographic area of particular interest includes the Greater Blue Mountains World Heritage Area (which comprises Blue Mountains, Kanangra-Boyd, Gardens of Stone, Nattai, Thirlmere Lakes, Wollemi and Yengo National Parks and Jenolan Karst Conservation Reserve) and adjacent lands.

The area of the proposed mine at Lue is only 20 km from the Greater Blue Mountains World Heritage Area and falls within our geographic area of interest.

Existing pressures on the flora and fauna

Many fauna species in the Greater Blue Mountains World Heritage Area, especially those that prefer habitats associated with relatively fertile soils, such as the Koala, Regent Honeyeater and woodland birds, are likely to be in part dependent on nearby areas of habitat on more fertile lands than generally occur in the World Heritage Area, including the area of the proposed Lue Mine project.

Blue Mountains Conservation Society is concerned that vegetation communities (ecological communities), including those that are already considered to be threatened, particularly those associated with more fertile soils in areas surrounding the Greater Blue Mountains World Heritage Area, continue to be cleared, degraded and placed at increasing risk of extinction. Such ecological communities provide habitat for many now rare and threatened flora and fauna species. Blue Mountains Conservation Society is concerned that, as a result of past and on-going habitat loss and degradation, an ever increasing number of plant and animal species within our area of interest are declining, despite many being already listed as threatened species under state and national threatened

species legislation

The recent 2019-20 bushfires in the Greater Blue Mountains region followed a period of severe drought and record high temperatures. These fires were the most severe and most widespread recorded in the region since European settlement. They burned around three-quarters of the Greater Blue Mountains World Heritage Area. Additional areas of surrounding lands were also burned. The combined effects of drought, high temperatures and bushfires have massively further reduced populations of the local flora and fauna and have exacerbated the impacts of habitat loss and degradation.

Our objection to the proposed Bowdens Silver Project

Blue Mountains Conservation Society objects to the proposed Bowdens Silver Project because it will have an unacceptable impact on biodiversity, including plants, animals and ecological communities that are already facing a real risk of extinction.

The proposed project will result in:

- Clearing of 381.71 ha of native vegetation within 18 months of project commencement.
- Clearing of 147.82 ha of **critically endangered** 'Box-Gum Woodland' listed under the Commonwealth *Environment Protection and Biodiversity and Conservation Act 1999* and NSW *Biodiversity Conservation Act 2016* and an additional 34.45 ha of 'Box-Gum Woodland' listed only under the NSW *Biodiversity Conservation Act 2016*.
- Fragmentation and degradation of a very large area (519.2 ha) of nationally listed **critically endangered** 'Box-Gum Woodland' that will remain within the Study Area on completion of the project.
- Clearing of 139.59 ha of known core Koala habitat. A just completed State parliamentary investigation report has predicted that the Koala will become **extinct** in NSW before 2050 unless there is urgent government intervention to prevent further habitat loss.
- Clearing of 182.27 ha of important habitat for the **critically endangered** Regent Honeyeater. Pre 2019-20 bushfire estimates indicate that only 350-400 mature Regent Honeyeaters remain in the wild, post-fire the numbers may be even lower.
- Loss of known habitat and likely also individuals of 14 **threatened** fauna species which are listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* and/or the NSW *Biodiversity Conservation Act 2016* and have been recorded in the Study Area. These species are the Koala, Barking Owl, Dusky Woodswallow, Hooded Robin, Diamond Firetail, Varied Sittella, Scarlet Robin, Speckled Warbler, Brown Treecreeper, Grey-crowned Babbler, Eastern Cave Bat, Greater Broad-nosed Bat, Eastern Bentwing Bat and Large-eared Pied Bat.
- Loss of habitat for additional **threatened** species which have been recorded close to the Study Area including the Spotted-tailed Quoll. We note that the threatened Gang-gang Cockatoo and Glossy Black-Cockatoo (which are not considered in the EIS) have also been recently sighted in the vicinity (Bara Road) of the proposed development.

- Removal of Ausfield's Wattle habitat and likely plants. Ausfeld's Wattle is identified as a 'Red Flag' in the NSW BioBanking Credit Calculator i.e. it is a species that is considered unable to withstand any further loss if it is to survive in the future.

The EIS prepared for the proposed project acknowledges the above losses and impacts associated with the project. Blue Mountains Conservation Society believes that the proposed compensatory mitigation measures and off sets detailed in the EIS are inadequate. Despite proposed mitigation measures and off-sets, there will be a significant net loss of critically endangered 'Box-Gum Woodland'. There will be a significant net loss of important habitat of the critically endangered Regent Honeyeater, the Koala which is at risk of extinction, and a large number of other declining woodland species. Remaining critically endangered 'Box-Gum Woodland' and important habitat of the critically endangered Regent Honeyeater, the Koala and other declining woodland species will be fragmented by the proposed action and thus likely degraded in the long term.

Blue Mountains Conservation Society is also concerned about future risks to public health and safety as the proposed project will:

- Redirect dirty mine water from Ulan Mine in the Hunter catchment, to the proposed mine in the Macquarie catchment on the other side of the Great Dividing Range.
- Generate pollutants during the life of the mine, for example lead dust. We note that the proposed mine, which will produce mainly lead and zinc, is only 2 km from the existing Lue township and public school. It is expected that the proposed open cut mine will generate 83, 000 tonnes of lead, 116,000 tonnes of zinc and only 1502 tonnes of silver during the 16.5 year life of the mine.
- Generate an accumulation of environmental pollutants that will be left at the site in perpetuity. Such pollutants include cyanide-bearing waste following on-site processing of the ore. The cyanide-bearing waste will accumulate in a Tailings Storage Facility (which will cover approximately 117 ha, have a final embankment standing 56 m above the lowest natural ground level and is upstream of the Mudgee township) which will remain at the site following eventual closure of the mine. The open cut mine void (covering close to 50 ha); and acid forming rock in the waste rock emplacement (covering approximately 77 ha) will also be left at the site when the mine closes. It is proposed that the mine will have a 16.5 year life span

In conclusion, Blue Mountains Conservation Society does not believe that the proposed project is in keeping with the principles of Ecologically Sustainable Development or in the Public Interest.

Yours sincerely,



Tara Cameron
President
Blue Mountains Conservation Society
mobile 0419 824 974 or email president@bluemountains.org.au