

Submission  
No 55

**INQUIRY INTO CURRENT AND POTENTIAL IMPACTS OF  
GOLD, SILVER, LEAD AND ZINC MINING ON HUMAN  
HEALTH, LAND, AIR AND WATER QUALITY IN NEW  
SOUTH WALES**

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Partially  
Confidential

## **Inquiry into current and potential impacts of gold, silver, lead and zinc mining on human health, land, air and water quality in New South Wales**

### **BACKGROUND**

I operate an Eco-Tourism and regenerative agricultural operation near Rylstone.

Our property borders World Heritage National Park where we have over 50,000 visitors/year to Ganguddy-Dunn's Swamp Wollemi National Park (National Parks Data 2017-2018). This has greatly increased since the pandemic. My family have been in this community for five generations and were early adopters in eco-tourism.

I have grave concerns for the continuity of our business, for our health, the health of our community, the health of our livestock, plants and pastures, the loss of biodiversity and the impact on our environment if the proposed Bowdens Lead, Zinc & Silver mine (BS Mine) goes ahead.

### **CONCERNS**

1. The **MERITS** of this proposal were not tested and examination of such denied by an IPC hearing. This proposal has been given approval with fourteen recommendations, but without the details determined, and, on a flawed EIS.
2. **WATER** - Two prior proponents (Rio Tinto and Kingsgate) walked away from this venture, because there is not enough water for operation.
3. The **HEALTH IMPACTS** on human life were deemed collateral damage (monitoring is a late indicator),
4. **TOURISM** – The visitor economy was not considered. The failure of the IPC to address the scientific reports and data presented
5. **BIODIVERSITY** loss and endangered communities
6. **JOBS** -Nil net analysis of employment/economic benefits conducted.

### **MERITS EXAMINATION – MERIT APPEAL RIGHTS EXTINGUISHED**

- Major projects demand rigorous appraisal. All scientific evidence is required, and the arguments be tested on many fronts. Rigorous scrutiny did not happen with the BS Mine.
- Where arguments remain unresolved a Merit Appeal rights is essential for integrity of process. That these were removed by the previous Minister for Planning, Hon Anthony Roberts, has left communities disadvantaged and much at risk. Merit Appeal rights were extinguished in the case of the BS Mine
- “Streamline processes,” or green-lighting projects, without proper process in the name of “critical minerals,” “sustainable energy” or “state significant project” does not justify compromising process. Process has been compromised to allow approval for the BS Mine.

- Approvals for major projects require full detailed plans of all aspects of operation. The BS mine project, approved with fourteen recommendations is unacceptable. The recommendation is that the project approval be revoked until the management plans are details for these fourteen conditions.

**A lack of justice and fairness with merit rights Extinguished by an IPC Hearing.  
Good policy Framework requires opportunity to test merits by the Law – Reinstate merit rights and allow the BS mine to be tested on Merits.**

## WATER

- The “Water amendment” completely changed the project. Such a major amendment demands a whole new application. A new development application needs to allow 3 months for community consultation. It is reprehensible that this “amendment” be allowed, as such, and not go through the rigor of a new application. The mental anguish caused by this major amendment is a huge cost to our community. The seemingly deliberate disregard for community consultation suggests underhanded elements at play.

Water is critical for all aspects of the community, the environment, tourism, and primary industries. Both the potential lack of, and pollution of, the surface and ground water are unacceptable risks. Mid-Western Regional Council have outlined on 27/7/2020 the concerns that this project presents regarding water. This recent “amendment” intensifies these concerns. Interfering with the ground water will be irreversible. Polluting the water supply will also be irreversible.

- This region is renowned for its pristine waterways. This attribute is significant for both tourism and our high-quality agricultural enterprises. The BS Mine is not congruent with either of these industries or pristine waterways.
- The waterways of this region are the headwaters feeding into the Murray Darling Basin. This waterway must not be compromised to add to a nationally, noted environmental, dire situation. We cannot afford to lose further aquatic species in this system.
- Tailings dams ultimately fail. With the recent weather events causing major flooding in our region, a tailings dam with the contaminates would have flooded and spilled into the surrounding waterways with catastrophic consequences.

With Climate change, more of these events are expected. No mitigation plans have been reported by the BS Mine. There are many other tailing dam environmental disasters and, should this project go ahead, it will be another one

- Dust from the mining operation will pollute the air and the surfaces, ultimately polluting the water. Most residents harvest their drinking water from roof surfaces, which, with this project, will be contaminated with Lead, amongst other things.

We are encouraged to take the lead out of petroleum for our vehicles, lead out of paint, yet the DPI justify adding lead to the air and the drinking water.

It is inconceivable that in 2023, we would be having this discussion. Again, it suggests underhandedness, as I find it difficult to believe that this is not common sense.

**The BS Mine does not have enough licenced water to process the ore they mine on their site. There is no mitigation for seasonal events and climate change.**

**Not enough water to process and supress dust and an inability to retain toxic tailings and prevent toxic leaching and spills into downstream waterways**

### **TOURISM – THE VISITOR ECONOMY**

- This is a \$1.3 billion economy in the central west region and specifically, a \$1 million local economy that will be negatively impacted by the proposed BS mine.
- The visitor economy locally, employs 930 people directly. The central region visitor economy supported 2,254 jobs and businesses.
- It is this central-west region that is being targeted by Gold, Lead, Zinc & Silver mining.
- Mudgee has been crowned the No1 Tourist destination 2 years running and with a strong winery association. Consumers have voiced their concern and turned away from purchasing the renowned Orange Cool Climate wines since the 7:30 Report of the Cadia pollution. The BS mine will have a similar impact on the Mudgee Wine industry.
- The global Tourism market is set to reach US\$16.9 trillion by 2030, with the Asia Pacific region emerging as the largest market. THRIVE 2030, the Australian national strategy, projects it growing to A\$230 billion by 2030 with long-term sustainability of the visitor economy (Tourism.australia.com).
- It is prudent that we, in NSW, protect the visitor economy that we have developed, enhance it, and partake in this growth industry.

***“The Commission acknowledges the concerns raised by the community in relation to the mine’s potential impacts to existing economies, for example, agricultural and tourism. However, the Commission is satisfied with the economic assessment that has been undertaken for the Project. “***

**An absence of analysis of the visitor-economy by both the Department of Planning and the IPC is a failure.**

### **HEALTH**

Water-Air-Noise-Mental Health

The health issues that the proposed BS Mine presents are monumental. Already, significant anxiety and mental health issues are being experienced in our community, at both the potential displacement, loss of businesses and employment and the poisoning by the toxic chemicals and lead.

The EIS, a 746-page document, released in 2020 during COVID lockdown, when community could not come together and decipher the extent of this project, further disadvantages an overwhelmed community, exasperating mental health issues. This community had just come through a severe drought, followed by the Gospers Mountain Black Summer Bushfires and major flood events. Not only is community consultation necessary, but it should also be with consideration, be appropriate and with full disclosure.

The failing of a rigorous, transparent and consultive planning framework, forces the community to engage experts to deliver reports at considerable cost and time. Consultation and collaboration with communities at the outset would see better outcomes for all parties.

Air Pollution: Lead processing and ore crushing 2km from Lue primary school is not considered appropriate for child health. Offering blood tests to monitor heavy metal blood levels implies risk. Discovery of toxic heavy metals levels in blood is too late – hence monitoring is a late indicator. Given Cadia as an example, the response time of 3 years, to complaints comes too late. Blood testing children is not a reasonable recommendation by the DPi and the BS mine.

Noise pollution from blasting from 10am to 4pm 6 days a week, 2km from the primary school is not consistent with a good health policy.

**Although the Commission indicates it is satisfied, that via self-monitoring, the Project can meet all relevant requirements for protecting human health and safety, it is the community that will be required to test this. As monitoring is a late indicator, human health is collateral damage to the BS Mine**

## **BIODIVERSITY**

The bilateral assessment has failed to adequately assess several Matters of National Environmental Significance.

These include:

There is a complex of endangered montane mire communities distributed across the tablelands and adjacent ranges of NSW which are referable to the Temperate Highland Peat Swamps on Sandstone Endangered Ecological Communities Commonwealth EPBC Act listing.

These are groundwater dependent ecosystems (GDEs) and at risk of significant impact from mining. The NSW assessment process has omitted any assessment of the presence of these on and adjacent to the mine site.

A recent report commissioned by Mid-Western Regional Council has mapped the area as Core Koala Habitat. The EIS and the NSW assessment process fails to properly consider the presence of and impact on the Koala.

The biodiversity offset strategy is incomplete.

**Hence, there is a failure to meet the assessment requirements under the Bilateral Agreement EPBC 2018/8372.**

### **JOBS**

Employment .... “jobs, jobs, jobs – this is the constant mantra presented to communities by both the extraction proponent, The Minerals Council, and the Planning Department.

The **NET JOBS** analysis is never projected. The gross number of jobs attributed to the extraction industry is the only data reported. The BS Mine projects 200-300 jobs (depending on which BS report you refer to).

Accurate analysis requires an account of both the job and business losses as a result of the proposal in addition to attributed to the project. In the case of the BS project, this will be significant negative.

Potentially 925 direct tourism jobs, in addition to the associated service industries will be lost to a 300 gain. Agricultural employment and enterprises will also be lost to this project.

**The net position is significantly negative by over 600 jobs and business**

### **Recommendations:**

- 1. Reinstate merit rights and allow the BS mine to be tested on Merits. Good policy Framework requires opportunity to test merits by the Law**
- 2. Review the Water Needs and Sources**

**The BS Mine does not have enough licenced water to process the ore they mine on their site. There is no mitigation for seasonal events and climate change.**

**Not enough water to process and supress dust and an inability to retain toxic tailings and prevent toxic leaching and spills into downstream waterways**

**State Significant Developments provide evidence they have a secure high security water supply for the water needs of their project prior to SEARS being issued. Amendments to Water Supply Sources must not be accepted during or following the EIS process. Any change to water sources must result in a reissue of SEARs.**

- 3. An absence of analysis of the visitor-economy by both the Department of Planning and the IPC is a failure. Revoke the BS Mine approval and provide data for the potential economic losses in tourism and agriculture to satisfy economic viability for the Mid-Western Region**

4. **Lead, and the processing chemicals for Silver & Gold mining are incredibly toxic and dangerous. The immediate hazards and the long-term (forever) hazards cannot be managed.**

**Other countries have banned this type of mineral mining. Incentivise alternative materials and low toxicity processes, in addition to the recycling of these minerals. "On balance" does not work in this case.**

**Independent monitoring by Third parties be made mandatory**

5. **Recall the project and complete a thorough assessment to meet the requirements of the Bilateral Agreement EPBC 2018/8372.**
6. **Review the Economic Employment Data to consider the impacted industries of Tourism and Agriculture**

**An accurate economic and employment analysis requires an account of both the job and business losses resulting from the proposal in addition to jobs attributed to the project. Full transparency of both negatively impacted employment and project employment is required.**

## **CONCLUSION**

**The Bowdens Lead Silver Mine have not provided the required data and reports to qualify for approval. Revoke the approval and allow a merits appeal.**

**The Planning Department require a stronger framework for major projects. The IPC are required to be completely independent and without conflict of interest. Consider policy changes to prevent the failing that have occurred in approving this project.**

The Bowdens Lead Silver mine has not had a comprehensive assessment and the Merits have not been tested.

I'm calling on you to revoke the decision and allow a full merits assessment.

Please don't allow what happened at Sunny Corner to happen in the No 1 tourism destination - Mudgee.

I refer to this shop video report by Professor Ian Wright, Environmental Scientist at Western Sydney.

<https://www.youtube.com/watch?v=GL9hr5fClGo>