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NSW Independent Planning Commission
Uploaded

8th November 2026

Submission - Bowdens Silver Project SSD-5765

Position: **OPPOSED**

Healthy Rivers Dubbo is a grassroots community group providing a strong voice for the rivers and communities of inland NSW. We pay our respects to Traditional Owners past and present and acknowledge that sovereignty was never ceded.

Healthy Rivers Dubbo (HRD) is strongly opposed to the Bowdens Silver Project SSD-5765.

This submission will focus on the threat this project poses to the waters of the Cudgegong Macquarie/Wambuul valley. We made a submission in 2021 opposing the extension to the Environmental Impact Statement, and a submission to the 2022 NSW parliamentary 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.*

Water Impacts

The mine would sit on Lawsons Creek, which flows into the Cudgegong and Wambuul/Macquarie Rivers. The project would use 1.2 to 1.3 GL (billion litres) of water annually. In severe drought remnant pools will likely be the only water available to farmers and wildlife, while mine operations themselves may need to be scaled back. There is no spare water in the valley that could be used to suppress lead dust at a new lead mine.

Critical Data Gaps

This project cannot be approved given the critical lack of data.
There are no stream gauges on the unregulated Lawson's Creek, Walkers Creek, Price Creek or Blackmans Gully to calibrate the hydrological models being used. The model was calibrated using the permanently flowing regulated Cudgegong River upstream of Rylstone. During the 2017-2019 drought, that gauge recorded only about 1.1-1.8 GL a year, compared with the modelled long-term average of about 7.1 GL a year attributed to Lawsons Creek. Local flow data has since been

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collected, but the 2026 review did not present a recalibrated or revalidated model using that data.

Lack of data means the impact of taking 1.2 to 1.3 GL annually on environmental flows, groundwater systems, water users and the supply of basic landholder rights cannot be adequately assessed.

Contamination Assured

Contaminated seepage from the project is expected. A large tailings storage facility and void would be left unmanaged after the life of the mine.

The independent reviewer Earth Systems has confirmed that acid and metalliferous drainage may continue for hundreds of years and raised concerns about the liners and storage technology proposed. There is no evidence that the design of waste storage and management of the final void have been stress tested under climate change scenarios.

Contaminated water from the proposed mine would impact:

- Town water supplies for Mudgee, Gulgong and towns and villages in the Dubbo Regional Council area;
- Stock and domestic supplies throughout the catchment;
- The internationally significant Ramsar listed Macquarie Marshes.

There is no credible long term strategy for:

- water quality monitoring given inadequate baseline water monitoring has been done;
- Managing acid generating waste rock and tailings;
- Containing contaminated water with emergency spillway operations following extreme rainfall events;
- Managing the waste rock emplacement and final void.

For further information contact

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For

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