



AA | A0420245

23 February 2023

Commissioners
IPC – Bowdens Silver Project
Independent Planning Commission
Suite 15.02, 135 King Street
SYDNEY NSW 2000

Dear Commissioners,

SUBJECT: BOWDENS SILVER PROJECT (SSD-5765)

Thank you for the opportunity to present to the IPC regarding Bowdens Silver Project (SSD-5765). Further to discussions, please find below key points Council requested to be further considered in the assessment of the project and the development of conditions.

Transport

We highlight that the Department's Assessment Report rejects Council's request that the relocation of Maloney's Roads should occur prior to any on site construction (See Point 334 in Assessment report). We request that this is reviewed and that the condition should note that Maloney's Road is completed prior to construction, if consent is provided. The construction traffic is too large an impost on the village of Lue.

Complaints Register

A complaints register has been noted in the Draft conditions, however Council continues to request that this is formalised and that a comprehensive complaints process is prepared and endorsed prior to commencement of construction.

Voluntary Land Acquisition Management Policy

The Voluntary Land Acquisition Management Policy has been incorporated into the Conditions of Consent, however this is only acknowledged for two residences (R35 and R87). Council requests that this should be in place for any privately-owned land within 2 km of the mine site. (Noted in PART C – Draft Conditions)

Acid Mine Drainage

Council are concerned about content in the Assessment report regarding Acid Mine Drainage. It is noted in the Department's report that the independent expert "Earth Systems" raised concerns about the reliability of the proposed NAF/PAF rock classification (Point 150 in the report) and it was noted *that further work/testing is needed to be undertaken to ensure effective management of AMD*. The report continues, in Point 153, *whereby the Department*

has recommended a further verification process to confirm the proportion of NAF versus PAF rock and the preparation of a detailed AMD management plan, before mining can occur. Council will be looking for assurances that the proposed management of AMD is appropriate.

Council are further concerned by the comment in the Earth Systems report where it was noted that *the design of the facilities will need to be updated, noting that GCL liners have a limited design life, store-and release covers are not suitable for AMD control, and the longevity of AMD generation from PAF waste rock is unknown but may continue for hundreds of years.* This comment from Earth Systems needs to be considered. Council are not experts in this area, however this comment from the independent expert raises concern. It is important that the long term impacts to the region's water supply and environment are managed appropriately.

There are significant economic benefits for this project. To date, Bowdens have actively been engaged in the community and have provided on going communication with Council and the community.

Should you have any further enquiries in relation to this matter, please contact Council on (02)



BRAD CAM
GENERAL MANAGER