



8 February 2023

Mr Clay Preshaw
Executive Director Resource Assessments
Department of Planning and Environment

via email: [REDACTED]

Dear Mr Preshaw,

**Bowdens Silver Project (SSD-5765)
Request for Information**

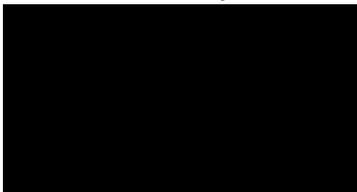
I refer to the State significant development application for the Bowdens Silver Project (SSD-5765) (**Application**), currently before the Independent Planning Commission (**Commission**) for determination.

The Commission is seeking information from the Department of Planning and Environment (**Department**) and the Applicant on matters that have been identified by the Commission Panel in Attachment A to assist their ongoing deliberations.

The Commission will consider any written response provided before 10 February 2023 unless an extension to this timeframe is requested and agreed to by the Commission.

Should you require any clarification in relation to the above, or wish to discuss further, please contact Phoebe Jarvis via [REDACTED] or [REDACTED].

Yours sincerely,



Stephen Barry
Planning Director

ATTACHMENT A – Questions for the Department of Planning and Environment

Community Consultative Committee

1. Can the Department clarify if the Community Consultative Committee for the Bowdens Silver Project has been formally formed?

Relocation of 500 kV Transmission Line

2. During the Commission's stakeholder meeting with Mid-Western Regional Council, Council had indicated that the construction of the relocated 500kV Transmission Line will be "underground", rather than via a relocated aboveground transmission line:

... I believe that the visual impact around the transmission line is changing, the way they're actually going to construct that, they're talking about that being underground. So, you know, that's something that needs to be at least taken into consideration....

(Page 5, Council Meeting Transcript)

Can the Department clarify how the proposed relocation of the 500kV Transmission Line will be constructed and completed?

Independent Expert Review prepared by Earth Systems

3. Mid-Western Regional Council at their stakeholder meeting with the Commission raised concern about comments in the Department's independent review and advice (prepared by Earth Systems) in relation to acid mine drainage (AMD), water balance modelling and surface water management:

... We are concerned by the comments in the Earth Systems Report, where advised that the design of the facility will need to be updated, noting that GCL liners have limited design life, store-and-release covers are not suitable for acid mining drainage....

(Page 13, Council Meeting Transcript)

Can the Department clarify the findings of the independent review and advice, and provide a response to the comments made by Mid-Western Regional Council?

Recommended Condition B34 – Materials Classification Verification Program

4. The Department have recommended Condition B34 relating to a Materials Classification Verification Program:

B34. The Applicant must prepare a Materials Classification Verification Program to validate the acid mine drainage risk classification system to the satisfaction of the Planning Secretary. This program must:

- (a) *be prepared by a suitably qualified expert(s);*
- (b) *be based on a sampling and testing program that has been approved by the Planning Secretary, that includes:*
 - (i) *static geochemical testing to verify the proposed classification of waste rock material as non-acid forming (NAF) or potentially acid forming (PAF); and*
 - (ii) *kinetic geochemical testing to quantify acid generation and duration rates (including lag time and longevity) from PAF waste rock; and*
- (c) *include a final report on the results and analysis of the testing program that:*
 - (i) *identifies and verifies the suitability of the adopted sulphur cut-off value(s) for classifying waste rock materials as NAF; and*
 - (ii) *demonstrates that there is sufficient NAF material available for construction of the mine and to successfully rehabilitate the site, including full encapsulation of PAF materials.*

What does the process of kinetic geochemical testing entail and how will it work in practice including over what time frame? Will the geochemical testing program

continue to sample and test as the pit is excavated, as it is likely the proportion of NAF and PAF will change with depth?

Recommended Conditions B45 and B47 relating to the Tailings Dam

5. The tailings dam is presumably constructed with NAF rock but this is not specified in the draft Conditions. Section 5.6.2 of the Tailings Storage Facility Preliminary Design Report (May 2020) prepared by ATC Williams refers to an understanding that sufficient NAF rockfill is available from waste rock. Given the high ratio of PAF/NAF generally at the mine site, is there sufficient NAF rock fill to satisfy all the requirements for NAF rock fill? What contingency/condition would be required to ensure an adequate supply of NAF rock fill for all the mine's needs?
6. The Tailings Storage Facility Preliminary Design Report refers to an estimate of steady state seepage at the end of LOM of less than 3L/sec. Three litres per second equates to 93ML per annum. This is to be collected by the seepage collection system, drained to the seepage collection ponds and subsequently pumped back to the TSF. Is this an indefinite arrangement and who will be responsible for ongoing management and oversight?