Department of Planning, Housing and Infrastructure

Our ref: SSD-5765

Ms Sam McLean
Executive Director
Independent Planning Commission of NSW

15 September 2026

Subject: Bowdens Silver Project

Dear Ms McLean

I write in response to your letter dated 28 November 2024 regarding the Bowdens Silver Project (project), which remains to be determined.

On 9th December 2024, the Department of Planning, Housing and Infrastructure (the Department) wrote to Bowdens Silver Pty Limited (Bowdens Silver), the applicant for the project, seeking further information on whether, following the decision by the NSW Court of Appeal that the development consent for the project was null and void, it would press the application in its current form or amend the application (see **Appendix E1**).

On 13th December 2024, the applicant confirmed (see **Appendix E2**) that it would press the application for development consent for the project in its current form as described in the following documents:

- Bowdens Silver Project Environmental Impact Statement: State Significant Development No. 5765 (RW Corkery & Co. Pty. Limited, 2020);
- Amendment Report for the Bowdens Silver Project (RW Corkery & Co. Pty Limited, 2021); and
- Water Supply Amendment Report for the Bowdens Silver Project (RW Corkery & Co. Pty Limited, 2022).

The Department also requested Bowdens Silver to provide a high-level assessment of the proposed transmission line and consideration of any statutory changes and changes that would affect the assessment of project since the application was originally determined by the Independent Planning Commission (IPC) on 3rd April 2023.

Transmission line:

As you are aware, a transmission line would be required to power the site. However, Bowdens Silver is not seeking development consent for that transmission line as it advises that alternative planning pathways for the transmission line under the *Environmental Planning & Assessment Act 1979* (EP&A Act) are available, including under Part 5, Division 5.1 of the EP&A Act.

On 23 May 2025, the Planning Secretary determined under section 4.38(4A) of the EP&A Act that a proposed 66 kilovolt (kV) transmission line required to connect the mine site to the existing transmission line network operated by Endeavour Energy does not form part of the single proposed development that is the Bowdens Silver Project - State significant development (SSD) 5765 (see **Appendix E3**).

Bowdens Silver is still finalising route options for the transmission line but has indicated that its proposed option is to connect to an existing transmission line in the Camboon/Breakfast Creek area. Notwithstanding the above, the company has identified the general locality they are considering for the transmission line and has undertaken a high-level assessment of the constraints and potential impacts should the transmission line be constructed in that area (see **Appendix E4**).

Other matters:

Bowdens Silver has provided further information considering legislative and policy updates of relevance to the project. The company has also provided an updated greenhouse gas (GHG) assessment in accordance with the *NSW Guide for Large Emitters,* and an updated biodiversity assessment undertaken in accordance with the Biodiversity Assessment Method.

Although no changes to the project are proposed, the company also commissioned reviews of other key expert studies and reports forming part of the EIS to ascertain whether there are any changes to the background context that might affect the assumptions or the findings in those assessments, and to update the assessments where necessary.

Bowdens Silver provided the following supplementary or updated assessment material:

- a supplementary social impact report that considers changes in community perspectives, changes in demographics, and the cumulative social impacts of numerous renewable energy projects proposed or under construction in the area;
- an economics impact assessment that re-evaluates the economic impacts of the project based on changes in project costs, commodity prices and revised potential environmental and social impacts; and
- a supplementary traffic and transport assessment that considers the impacts on the road network capacity and safety based on changed background traffic conditions.

Bowdens Silver also provided expert updated reviews of the Aboriginal cultural heritage assessment, human health risk assessment, noise and vibration assessment, air quality assessment, groundwater and surface water assessments, and agricultural assessment, which concluded that there are no changes of significance that would alter the findings and conclusions

of the assessments. The additional material provided by Bowdens Silver is listed in **Appendices E8-E23**.

The Department provides supplementary advice following review of the new material provided by Bowdens Silver (see **Appendix A).** The Department has also considered the potential impacts of the transmission line (see **Appendix B)**.

The Department has received representations about the project since the application was originally referred to the IPC. The Department has considered these representations as part of the supplementary advice. Most of the representations do not raise fundamentally new issues, but rather object in principle to the mine; provide commentary and opinions on the EIS documents and/or the Department's assessment; and/or raise issues that were previously raised in submissions and were considered by the Department and the IPC when it made its original determination on the project.

The Mudgee Region Action Group and the Mudgee Regional Health Alliance engaged Dr Cynthia Barlow of Research Services in Avondale University to review the lead risk assessment (see ref **Appendix E6**), and the Mudgee Region Action Group also commissioned Mr Douglas Williams of Access Archaeology to review the Aboriginal cultural heritage assessment (see ref **Appendix E7**). Many representations commented on the assessments with reference to those reviews. The Department's considerations of these reviews and Bowdens Silver's response to the reviews is summarised in **Appendix A.**

In summary, the new information does not fundamentally change the Department's previous assessment and conclusions about the merits of the project overall as documented in the report "*Bowdens Silver Project – State Significant Development SSD 5765*" dated December 2022. The Department also considers that the conditions imposed by the IPC in the now voided development consent would generally remain suitable for managing the impacts of the project, with some recommended changes as outlined in **Appendix D.**

The Department refers the Bowdens Silver project back to the IPC for re-determination.

Yours sincerely

[redacted]

Steve O'Donoghue
Director Resource Assessments

Appendix A - Supplementary Advice

Introduction

The Department provides the following supplementary advice based on the additional information provided by Bowdens Silver, representations received on the project since the Court of Appeal's decision, and additional advice requested by the Department from the Development Coordination Authority on biodiversity impacts. The key areas of additional review include:

- Statutory context
- Biodiversity impacts
- Greenhouse gas emissions
- Aboriginal cultural heritage
- Human health risk assessment
- Economic assessment
- Other issues

Statutory Context

Updates to Legislation, Policies and Guidelines

Changes to the EP&A Act:

On 16 August 2024 the NSW Court of Appeal upheld a legal challenge to the IPC's approval of the project. The Court of Appeal found that the IPC had not sufficiently considered the likely impacts of the transmission line and that the transmission line should have been considered as being part of a single proposed development that is SSD within the meaning of section 4.38(4) of the EP&A Act.

Section 4.38(4) of the EP&A Act states that:

> *"If part of a single proposed development that is SSD requires consent to be carried out and the other part may be carried out without development consent, then*
> *(a) Division 5.1 does not apply to that other part of the proposed development and*
> *(b) that other part is taken to be development that may only be carried out with consent."*

On 2 December 2024, the EP&A Act was amended to allow the Planning Secretary to determine whether offsite enabling infrastructure does or does not form part of the proposed development. Section 4.38(4A) of the EP&A Act states:

> *"The Planning Secretary may determine that particular development does or does not form part of a single proposed development for the purposes of subsection (4)."*

On 23 May 2025, the Planning Secretary determined under section 4.38(4A) of the EP&A Act that the proposed transmission line does not form part of the single proposed development that is SSD-5765. This decision allows the IPC to re-determine the project as proposed, without the transmission line.

Updates to climate legislation, policies and guidelines:

The *Climate Change (Net Zero Future) Act 2023* (Net Zero Future Act) was enacted on 11 December 2023. The Net Zero Future Act aims to give effect to the international commitments established in the 2015 Paris Agreement to hold global average temperatures to below 2 degrees Celsius (C) above pre-industrial levels, to pursue efforts to limit temperature increases to 1.5 degrees C, and to increase the ability of NSW to adapt to the adverse impacts of climate change. The Net Zero Future Act sets NSW GHG emissions reduction targets of at least 50% of 2005 levels by 2030, 70% by 2035 and net zero emissions by 2050.

The EPA has also released policies, plans and guidelines to support the implementation of the Net Zero Future Act, including the *Climate Change Policy*, *Climate Change Action Plan 2023-2026* and *NSW EPA Guide for Large Emitters*.

The *NSW Guide for Large Emitters* (EPA, 2025) details how GHG assessments should be prepared for projects that would emit 25,000 tonnes (t) per year or more of Scope 1 and 2 emissions of carbon dioxide equivalent (CO_2^{-e}).

The *Climate Change requirements for licensees* (EPA, 2026 outlines the NSW EPA's approach to introducing climate change–related requirements for EPLs. Climate Change Mitigation and Adaptation Plans (CCMAPs) will be progressively required under existing and new EPLs. CCMAPs will require licensees to demonstrate how they can minimise their GHG emissions and exposure to climate risk, with specific guidance for key sector (refer below). The NSW EPA published the *Emissions Reporting and Climate Change Mitigation and Adaptation Plans* guideline in March 2026. CCMAPs are due for publication for premises by 31 March 2027 or 31 August 2027, depending on licensee type.

As the project would exceed the threshold for large emitters, Bowdens Silver commissioned EMM Consulting Pty Ltd (EMM) to undertake an updated GHG assessment generally in accordance

with that guideline, noting that the guideline does not strictly apply to this development given the development application was lodged prior to the draft guideline being published.

The Department's consideration of the GHG assessment is summarised below.

Updates to State environmental planning policies

Attachment 3 of the Bowdens Silver Project additional information (see **Appendix E11**) provides an updated statutory review of key environmental planning instruments including relevant State environmental planning policies.

Some provisions within the SEPPs that apply to the project have also been updated. However, these changes would have no material effect on the carrying out of the development or the determination of the application as outlined in **Appendix E11**. Where relevant additional information has been provided to inform the determination, including in particular the updated biodiversity assessment.

Mid-Western Region Community Plan

The *Mid-Western Region Towards 2030 Community Plan* has been superseded by the *Mid-Western Region Towards 2040 Community Plan*. The updated plan outlines the community's vision for the future, setting new goals and strategies to guide development and growth in the region up to the year 2040.

One of the key focus areas of this plan is to build a prosperous and diversified economy that delivers community benefits through employment, income and sustainable economic growth. The project would contribute to the achievement of that goal by providing jobs and local investment.

The project would also not be inconsistent with the other four focus areas of the plan (looking after the community, protecting the natural environment, connection the region, and good local governance) as the project has been designed to avoid, minimise or mitigate environmental and amenity impacts.

Minerals Inquiry

In July 2023 the NSW Parliament established an inquiry into and report on the 'current and potential impacts of gold, silver, lead and zinc mining on human health, land, air and water quality in New South Wales'.

The findings of the inquiry panel were released in December 2023. Importantly, the Parliamentary Inquiry found that "*a number of regulatory bodies work across the mining sector – including the Department of Planning and Environment, the Independent Planning Commission, the Environment*

Protection Authority, the Resources Regulator and NSW Health. These regulatory bodies, and the detailed frameworks they administer, are fundamentally sound"

Public hearing

On 21 July 2022, the then Minister for Planning requested that the IPC conduct a public hearing into the carrying out of the project prior to determining the development application.

A public hearing was held by the IPC that included written submissions, and a 3-day public hearing session held over 15-17 February 2023.

As a public hearing has already been held for the development application, merit appeal rights for both the applicant and objectors are extinguished.

The Department notes that following recent legislative amendments to the EP&A Act, the threshold for the IPC to be consent authority has increased from 50 or more objections to 100 or more objections. As there were more than 100 submissions by way of objection, the IPC remains the consent authority for the project.

Other matters

There have been some updates and revisions to various other assessment guidance documents since the application was lodged. However, these updates do not strictly apply to the project (i.e. the revised guidance do not require re-assessment) and/or do not fundamentally change the assessment outcomes.

Biodiversity

Assessment approach

The project's biodiversity impacts were originally assessed under the former *Framework for Biodiversity Assessment* (FBA) in accordance with the requirements of the *Threatened Species Conservation Act 1995* (TSC Act). As the application was substantially progressed when the *Biodiversity Conservation Act 2016* (BC Act) commenced, the project qualified as a "pending or interim planning application" under clause 27(1)(2) of Part 7 of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017* and was not required to be assessed under the Biodiversity Assessment Method (BAM).

The project still qualifies as a pending or interim planning application and could be assessed under the TSC Act using the FBA, however Bowdens Silver sought the IPC's approval to complete the biodiversity assessment in accordance with the BC Act using the BAM. Under section 28(2) of the *Biodiversity Conservation (Savings and Transitional) Regulation 2017*, an Applicant of a "pending

or interim planning application" may agree with the planning approval body that Part 7 of the BC Act is to apply instead of the former planning provisions (i.e. the *Threatened Species Conservation Act 1995*). On 22 December 2025, the IPC agreed to Bowden Silver's request that Part 7 of the BC Act is to apply to the project.

Accordingly, Bowdens Silver commissioned Hunter Eco to prepare a new biodiversity development assessment report (BDAR) in accordance with the BAM under the BC Act. The BDAR considers the results of all relevant previous ecology data, as well as recent vegetation, land categorisation, and threatened flora and fauna surveys.

The Department referred the BDAR to the Development Coordination Authority (DCA) for advice. The DCA identified a small number of matters relating to the proposed mitigation measures and biodiversity credit calculations (see **Appendix E24**), which were subsequently addressed by Bowdens Silver (see **Appendices E25 and E26**). Following those amendments, the DCA did not raise concerns with the BDAR (see **Appendix E27**).

The new BDAR does not reflect a change to the development footprint. Rather, it provides a contemporary assessment of biodiversity impacts using the BAM. As a result, some vegetation communities, threatened species habitat and biodiversity credit obligations have been reclassified or recalculated compared with the original biodiversity assessment.

Avoidance and Minimisation

The project's development footprint is 487.21 ha, comprising 199.88 ha for Stage 1 and 287.33 ha for Stage 2.

As noted in the Department's assessment report, the project has been designed to avoid and minimise impacts on biodiversity within the development footprint. The location was selected based upon the presence of an economically mineable resource, and environmental and engineering constraints were used to inform the siting and configuration of infrastructure from the outset.

A traffic light model was used to guide changes to the mine site, including the addition of water storage dams and relocation of mine site infrastructure. Soil stockpiles have been designed to reduce the area of vegetation to be removed and access tracks and services and utilities corridors have been routed along existing disturbed alignments where possible and the widths minimised to avoid biodiversity impacts.

In addition, Bowdens Silver would implement a range of measures to minimise and mitigate impacts as part of operating. These include micro siting to minimise clearing, avoiding large trees

on the edge of the development footprint, undertaking pre-clearance surveys, seed collection, lighting controls, weed and pest management, cyanide management, erosion control, stock grazing control, and rehabilitation.

Other measures are also proposed to minimise impacts on specific species, including:

- traffic management measures, including speed limits, fauna warning signage and incident recording procedures to reduce the risk of fauna vehicle strike;
- implementation of a nest box program to provide replacement habitat for hollow dependent fauna supported with ongoing monitoring and maintenance;
- supervision by a qualified person during clearing activities, stopping work and relocating Koalas and Southern Greater Gliders that are detected, management and monitoring to protect Koalas and Southern Greater Gliders from moving into or out of isolated habitat patches within the project, incident response procedures for injured or displaced Koalas, and recording and monitoring encounters and vehicle strikes;
- targeted threatened flora management measures, including pre-clearance surveys for species assumed present under the BAM (such as Wingello Grevillea and *Phebalium bifidum*), micro-siting and design refinement to avoid confirmed individuals where practicable, and implementation of species-specific translocation and/or propagation programs where impacts cannot reasonably be avoided;
- the revegetation of approximately 340 hectares (ha) of the post mine landform to native vegetation (~150 ha woodland and ~190 ha native grassland) using species consistent with the existing plant communities;
- a revegetation program to restore 100 ha of Box Gum Woodland within derived native grassland or cleared land; and
- preparation and implementation of a comprehensive biodiversity management plan.

The DCA recommended some additional measures to manage and mitigate impacts to biodiversity, including adaptive management of unplanned pooling of cyanide, additional fauna deterrents around the tailings storage facility (TSF), and measures for managing Koala, Greater Glider and Pink-tailed Legless Lizard. Bowdens Silver has agreed to implement these measures, and the Department considers these could be described in the biodiversity management plan for the project and has included these in the recommended conditions (see Appendix D).

Native Vegetation

The new BDAR applies the BAM, which classifies vegetation using plant community types (PCTs) rather than the FBA methodology of Biometric Vegetation Types (BVTs) used in the original biodiversity assessment. Due to the change in methodology the classification of and extent of some vegetation communities identified within the development footprint differs from the original biodiversity assessment. These differences reflect updated vegetation mapping, contemporary survey effort and revised condition assessment under the BAM rather than any change to the development footprint.

Based on contemporary surveys, eight PCTs in 27 vegetation zones based on the conditions of the vegetation have been mapped across the 487.21 ha development footprint. After the implementation of avoidance and minimisation measures, the project would disturb approximately 435.84 ha of native vegetation that provides habitat for threatened species and includes one threatened ecological community (TEC).

Threatened ecological communities

The new BDAR identifies a single TEC within the development footprint, namely the White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South Eastern Corner and Riverina Bioregions (Box-Gum Woodland), which is listed as a critically endangered ecological community (CEEC) under the *Biodiversity Conservation Act 2016*.

The project would impact approximately 216.82 ha of Box Gum Woodland, comprising approximately 169.51 ha of woodland, 47.05 ha of derived native grassland and 0.26 ha of plantings. 216.56 ha of this ecological community is also listed under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). Noting, the Commonwealth listing advice excludes some patches of the ecological community based on condition or structure thresholds (including patch size, ground cover and tree density).

Box-Gum Woodland was also identified in the original biodiversity assessment. However the original biodiversity assessment mapped vegetation using the FBA's former BVT classification system, identifying 180.17 ha (48% of which was derived native grassland) within the development footprint, whereas the new BDAR applies the BAM and contemporary PCT mapping, identifying approximately 216.82 ha (21% of which is derived native grassland) within the development footprint. The difference in the mapped extent of Box Gum Woodland reflects updated vegetation classification, contemporary survey effort and revised condition assessment

criteria under the BAM, rather than the identification of a new ecological community or any change to the development footprint.

Threatened flora and fauna

Contemporary surveys identified 141 native fauna species including 12 threatened fauna species listed under the BC Act and/or the EPBC Act. Six threatened fauna species classified as species credit species under the BAM were recorded in habitat located within or adjoining the development footprint.

Most threatened fauna species recorded during the contemporary surveys were previously identified during earlier investigations for the project. The Squirrel Glider and Southern Greater Glider are the only additional threatened fauna species identified compared to the original surveys, noting the Squirrel Glider was previously assumed present.

Species assumed present under the BAM

Eight threatened flora species listed under the BC Act have been assumed present as contemporary surveys that would satisfy the BAM survey requirements could not be completed. These species are:

- Asfeld's Wattle (*Acacia ausfeldii*);
- Wingello Grevillea (*Grevillea obtusiflora*);
- *Ozothamnus tesselatus*;
- *Phebalium bifidum*;
- Wollemi Mint-bush (*Prostanthera cryptandroides subsp. cryptandroides*);
- Small Purple-pea (*Swainsona recta*);
- Silky Swainson-pea (*Swainsona sericea*);

Additionally, trees with characteristics consistent with Capertee Stringybark were identified within the development footprint and specimens were sent to the National Herbarium of NSW for identification. Pending completion of that identification process, the species is assumed to be present.

Species subject to expert review

Additional expert advice was obtained for two threatened species to inform the biodiversity assessment.

Dr William Terry (Arcadis Australia Pacific) provided an expert report for the Pink-tailed Legless Lizard (*Aprasia parapulchella*), which identifies suitable rocky habitat consistent with known habitat preferences for the species. Although no individuals were detected, the extent and quality of habitat supports an assumption of presence, and a species polygon was defined accordingly.

Dr Stephen Bell (Eastcoast Flora Survey) provided an expert report for Tarengo Leek Orchid (*Prasophyllum petilum*), which concludes that suitable habitat for the species is not present.

Indirect impacts

The project would have a range of indirect impacts that remain unchanged since the original biodiversity assessment. The BDAR details indirect impacts including changes to habitat connectivity, edge effects on retained vegetation from climatic changes and weed and pest invasion and disturbance to fauna from noise, vibration and lighting. Bowdens Silver proposes the implementation of several mitigation measures to manage the risk of indirect impacts, refer to the above avoidance and minimisation section.

Prescribed Impacts

Prescribed impacts from the project include:

- impacts on caves, crevices, overhangs and outcrops within and around the project site that provide potential bat habitat for the Large-eared Pied Bat and Eastern Cave Bat;
- changes to habitat connectivity;
- impacts on fauna movement cycles;
- potential vehicle strike; and
- impact on water quality, water bodies and hydrological processes that sustain threatened species and threatened ecological communities

Approximately 6.07 ha of rocky bat habitat for the Large-eared Pied Bat and Eastern Cave Bat was mapped within the development footprint. The Large-eared Pied Bat was recorded throughout the biodiversity study area (the development footprint plus 2km). Breeding individuals were captured on the western project boundary, however, maternity site(s) was not identified. Under the BAM, breeding habitat for the Large-eared Pied Bat is defined as the rocky habitat and an additional 100 m buffer surrounding the rocky habitat. Based on this definition, the project would impact approximately 90 ha of breeding habitat.

The Eastern Cave Bat individuals were not captured and breeding was not recorded. Although potential breeding habitat exists within the development footprint, because breeding individuals were not identified the project is not predicted to impact breeding habitat for the Eastern Cave Bat. This finding is consistent with the BAM methodology.

An expert report identified six disjunct patches of rocky habitat consistent with the habitat preferences of the Pink-tailed Legless Lizard are located within the development footprint. These would be permanently removed.

Impacts on the rocky bat habitat from noise and blasting are considered unlikely as the rocky bat habitat is at least 344 m away from the proposed open cut pit.

The project would isolate some patches of habitat, including a larger (7.1 ha) patch of Blakely's Red Gum - Yellow Box Woodland, Red Stringybark - Inland Scribbly Gum Forest, and Blue-leaved Stringybark Forest. The 7.1 ha patch would be isolated by haul roads in the initial construction of the project and remain isolated until revegetation as part of the mine rehabilitation.

The project would impact habitat connectivity for terrestrial and arboreal mammals, however birds would not be materially affected. The BDAR concludes that some reduction in local connectivity and an increase in fragmentation would occur, but the broader landscape is expected to retain functional connectivity.

There would be some changes to flows in local watercourses from clean water diversions, changes to catchments and baseflow contributions.

No threatened aquatic or semi-aquatic threatened species are known to occur in the project area or nearby surrounds. While threatened birds, mammals and bats occur within the development footprint, changes in hydrological processes affecting Blackmans Gully or ephemeral creeks are not likely to impact these species.

Updated water sharing plan mapping identifies high-priority groundwater dependent ecosystems (GDEs) within both the development footprint and the broader groundwater drawdown area. GDEs within the development footprint would be cleared and have been assessed in the BDAR. The groundwater assessment review[1] and BDAR for the project conclude that GDEs outside the development footprint are unlikely to experience significant impacts from project related groundwater drawdown because groundwater occurs deeper than the maximum rooting depth of the dominant species present in the GDE.

[1] Jacobs 2026 - Bowdens Silver Project Groundwater Assessment Review

Offsets

Bowdens Silver would be required to offset the residual impacts in accordance with the BC Act and the offset strategy previously proposed by Bowdens Silver would not be applicable, although the company may still choose to retire some or all credits by establishing one or more biodiversity stewardship sites.

The impacts generate a total of 14,823 ecosystem credits (**Table A1**) and 95,241 species credits (**Table A2**) under the BAM.

As the vegetation clearing would occur over a period of around 12 years, Bowdens Silver proposes to offset the credits in two stages. Stage 1 (approximately the first 12 months) would involve approximately 165.11 ha of clearing and Stage 2 would be approximately 270.73 ha of clearing, refer to **Figure A1**. Ecosystem and species credits would be retired for each stage prior to commencing the clearing for that stage.

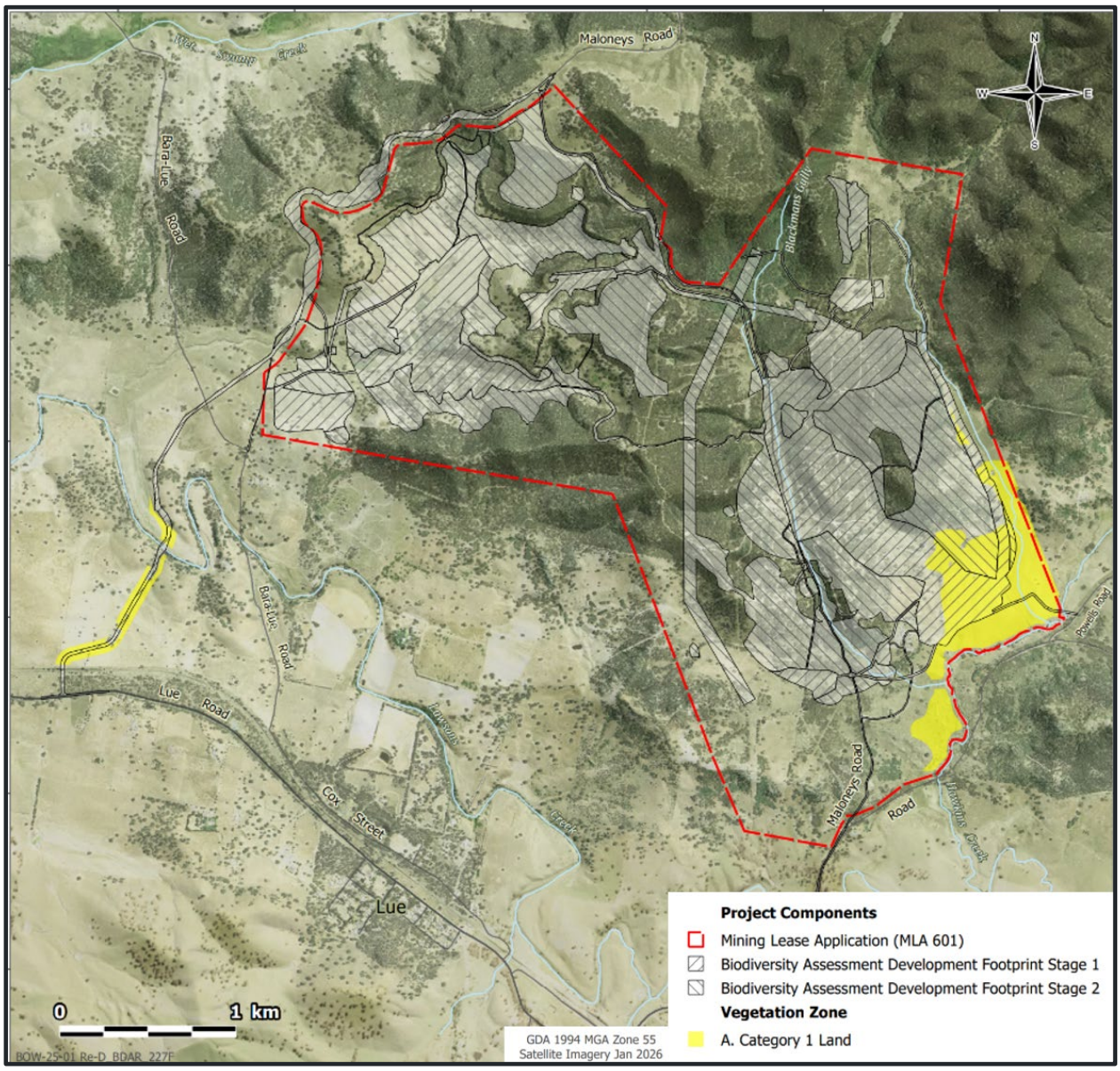

Figure A1 – Biodiversity credit obligation stage 1 and 2

Table A1 – Residual native vegetation impacts and biodiversity credit obligation

Plant Community Type	Offset trading group	Conservation Status		Hollow bearing credit	Stage 1		Stage 2	
		BC Act	EPBC Act		Impact area (ha)	Credits	Impact area (ha)	Credits
277 - Blakely's Red Gum - Yellow Box grassy tall woodland of the NSW South Western Slopes Bioregion	White Box – Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland in the NSW North Coast, New England Tableland, Nandewar, Brigalow Belt South, Sydney Basin, South Eastern Highlands, NSW South Western Slopes, South Eastern Corner and Riverina Bioregions (Box-Gum Woodland)	CE	CE	Yes	76.16	2813	102.4	4069
				No		254		203
3388 - Central West Valleys White Box Forest				Yes	14.27	246	16.8	569
				No		178		69
3396 - Northwest Slopes Box-Blakely's Red Gum Woodland				Yes	3.6	1	3.6	41
				No		136		73
273 - White Box shrubby open forest on fine grained sediments on steep slopes in the Mudgee region of the of central western slopes of NSW	Western Slopes Dry Sclerophyll Forests >=50% and <70%	-	-	No	0.46	18	6.2	241
323 - Red Stringybark - Inland Scribbly Gum open forest on steep hills in the Mudgee - northern section of the NSW South Western Slopes Bioregion	Western Slopes Dry Sclerophyll Forests <50%.	-	-	Yes	10.84	76	52.04	1352
				No		114		74
325 - Blue-leaved Stringybark open forest of the Mudgee region NSW central western slopes	Western Slopes Dry Sclerophyll Forests <50%	-	-	No	11.8	345	30.1	879
3528 - Western Hunter Flats Apple-Gum Shrub Forest	North-west Slopes Dry Sclerophyll Woodlands >=70% and <90%	-	-	No	36.2	1066	51.03	1499
3536 - Mudgee Ranges Stony Slopes Shrub Forest	Upper Riverina Dry Sclerophyll Forests >=50% and <70%	-	-	Yes	11.78	173	8.56	199
				No		113		22
			Total		**165.11**	**5,533**	**270.73**	**9,290**

Table A2 – Species credit obligations

Species Credit Species	Conservation significance		Stage 1 Credit obligation	Stage 2 Credit obligation
	BC Act	EPBC Act		
Threatened flora				
Acacia ausfeldii / *Ausfeld's Wattle*	V	-	3122	4560
Eucalyptus cannonii / Capertee Stringybark	V	-	55	856
Grevillea obtusiflora / Grevillea obtusiflora	E	E	519	1681
Ozothamnus tesselatus / Ozothamnus tesselatus	V	V	312	462
Phebalium bifidum / Phebalium bifidum	E	-	98	54
Prostanthera cryptandroides subsp. cryptandroides / Wollemi Mint-bush	V	V	77	240
Swainsona recta / Small purple pea	E	E	113	1569
Swainsona sericea / Silky Swainson-pea	V		204	2733
Threatened fauna				
Aprasia parapulchella / Pink-tailed Legless Lizard	V	V	37	67
Chalinolobus dwyeri / Large-eared Pied Bat	E	E	6993	13288
Ninox strenua / Powerful Owl	V	-	1751	3663
Petauroides volans / Southern Greater Glider	E	E[2]	1241	4043
Petaurus norfolcensis / Squirrel Glider	V	-	4209	8861
Phascolarctos cinereus / Koala	E	E[2]	5032	9120
Vespadelus troughtoni / Eastern Cave Bat	V		6993	13288
Total			**30,756**	**64,485**

[2] Listed as 'Vulnerable' under the EPBC Act at the time of the controlled action decision (5 April 2019), but is also assessed as 'Endangered' under the BC Act as required by the BAM (DPIE 2020a).

Serious and Irreversible Impact Considerations

Six threatened entities at risk of serious and irreversible impacts (SAII) occur or potentially occur within the development footprint. The project's residual impact on these entities is discussed below.

Box Gum Woodland

The Box-Gum Woodland CEEC is a threatened entity at risk of SAII because it is an ecological community in a rapid rate of decline (Principle 1) and its very small population size (Principle 2).

The project would disturb approximately 217 ha of Box Gum Woodland CEEC comprising 169.51 ha of woodland, 47.05 ha of derived native grassland and 0.26 ha of plantings equivalent to the Box-Gum Woodland CEEC listed under the BC Act. The DCA considers the clearing is likely to represent a cumulative loss in the region.

In accordance with clause 6.7 of the *Biodiversity Conservation Regulation 2017,* an impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of Box Gum Woodland becoming extinct because the impact would cause a further decline in the geographic distribution or further reduce the population size the CEEC. Information to support consideration of whether the project is likely to have a SAII on Box Gum Woodland is provided below.

The NSW Threatened Species Scientific Committee[3] (TSSC) describes Box-Gum Woodland CEEC as having undergone a very large historical reduction in geographic distribution and that it has experienced disruption of biotic processes of relative severity >90% over more than 90% of its distribution since 1750. However, the CEEC remains broadly distributed across New South Wales. The Department notes that estimates of the extent of Box Gum Woodland CEEC rely on TSSC data from 2006, which estimated the remaining area of occupancy (AOO) of the CEEC at approximately 250,729 ha and extent of occupation (EOO) at approximately 708,800km^2.

The BDAR concludes the project would not change the EOO of the Box-Gum Woodland CEEC because of the wide occurrence of the community in NSW and would not reduce the AOO because the loss due to the project would be a small portion of the 10 x 10 km grid cell, i.e. the grid cell would remain occupied by Box-Gum Woodland CEEC.

[3] Threatened Species Scientific Committee (TSSC) (2020) Conservation Assessment of White Box - Yellow Box – Blakely's Red Gum Grassy Woodland and Derived Native Grassland.

Based on the extent of occupancy estimated by the TSSC, the project would result in a 0.08% reduction in the distribution of the CEEC. Alternatively, based on the EOO calculated by Dr Col Driscoll, the project would result in a 0.003% reduction in the distribution of the CEEC.

Bowdens Silver proposes to undertake a revegetation program to restore 100 ha of Box Gum Woodland within derived native grassland or cleared land. The DCA notes that the proposed revegetation would contribute to a long-term increase in the extent of Box Gum Woodland CEEC, the program would not immediately compensate for the loss of existing moderate to high-quality CEEC.

The DCA recommended that the revegetation program be integrated with the proposed biodiversity management plan and secured as a biodiversity stewardship site.

Wingello Grevillea

Wingello Grevillea (*Grevillea obtusiflora* subsp. o*btusiflora*) is a threatened entity at risk of SAII because it is considered unlikely to respond to management actions due to being a sterile or primarily clonal species (Principle 4). Wingello Grevillea (*Grevillea obstusiflora)* also includes *Grevillea obtusiflora* subsp. *fecunda,* however, this species is a prolific seeder and does not meet principle 4.

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of Wingello Grevillea becoming extinct because the species is unlikely to respond to measures to improve its habitat and its members are not replaceable. Information to support consideration of whether the project is likely to have a SAII on Wingello Grevillea is provided below.

The species is considered unlikely to occur within the development footprint. No unidentifiable Grevillea spp. (i.e. possible Wingello Grevillea) were recorded during surveys within the associated PCTs. The species has a restricted occurrence in the Clandulla State Forest and Capertee Valley, and the closest record of the species is located over 30 km away. However, because BAM-compliant targeted surveys had not been completed at the time the BDAR was submitted, the species was assumed to be present within 37.73 ha of potential habitat associated with PCTs 323, 325 and 3396.

The assumed species polygon occurs within the development footprint and would be impacted by proposed stockpile and emplacement areas. If the species were present, direct impacts would be unavoidable.

Bowdens Silver has committed to undertaking targeted pre-clearance surveys during the relevant survey window to determine if the species is present within the development footprint. If the species is identified, Bowdens Silver would undertake micro siting or design refinement to avoid impacts and where avoidance is not possible, implement a translocation program.

The DCA considered that based on the species' known distribution, and the absence of any indicative records during field surveys, the likelihood of Wingello Grevillea occurring within the development footprint is low and that the SAII risk can be managed through completion of BAM-compliant surveys and avoidance of impacts identified. The DCA recommended that evidence be provided prior to construction demonstrating the absence of the species within the development footprint or, where the species is confirmed to occur, that a comprehensive review of impact avoidance, minimisation and adaptive management measures has been completed.

Phebalium Bifidum

Phebalium bifidum is a threatened entity at risk of SAII because it has a very small population (Principle 2) and a very limited geographic distribution (Principle 3).

The species is considered unlikely to occur within the development footprint. The species is only known from a limited number of locations within the Capertee Valley and is typically found in open woodland dominated by sparse ironbarks including *Eucalytpus nubilis* and *Eucalyptus fibrosa*, which were not recorded within the development footprint. In addition, vegetation zones potentially associated with this species were partly surveyed in September 2025 and the species was not found. The DCA similarly concluded that the likelihood of *Phebalium bifidum* occurring within the impact area is low based on the absence of suitable habitat characteristics and known distribution of the species.

Nevertheless, because BAM-compliant surveys had not been completed at the time the BDAR was submitted, the species was assumed to be present.

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of *Phebalium bifidum* becoming extinct because an impact would further reduce the population size or geographic distribution of the species. Information to support consideration of whether the project is likely to have a SAII on *Phebalium bifidum* is provided below.

The BDAR identified approximately 3.23 ha of potential habitat within the development footprint, primarily associated with proposed stockpile and emplacement areas. If the species were present within this area, direct impacts would be unavoidable.

Known populations of the species are located more than 40 km away. Despite the low likelihood of occurrence, Bowdens Silver would undertake pre-clearance surveys to confirm if the species is present. If the species is found, Bowdens Silver proposes to avoid direct impacts on any confirmed plants by micro siting and refined design, where reasonable. If impacts cannot be avoided, Bowdens Silver proposes to implement a propagation program. Additional targeted surveys for the species would also be undertaken across the broader mining lease area outside the development footprint to inform the extent of the population.

The DCA considers that the SAII risk to *Phebalium bifidum* can be managed in the same manner as Wingello Grevillea.

Regent Honeyeater

The Regent Honeyeater (*Anthochaera phrygia)* is a threatened entity at risk of SAII because it as a rapid rate of decline (Principle 1) and a very small population size (Principle 2).

The species has undergone a substantial population decline, with the current population estimated to comprise fewer than 300 individuals. However, the species remains widely distributed across NSW and is known to respond to management through habitat restoration and enhancement.

The project would impact approximately 385 ha of potential foraging habitat for the Regent Honeyeater. This habitat comprises PCTs (273, 277, 3388, 3396 and 3528) containing known nectar producing species, including Yellow Box, Blakely's Red Gum and Mugga Ironbark. Although there are limited records within the locality, the project area occurs between known breeding areas of Capertee Valley and Mudgee-Wollar.

The DCA notes that the relatively small number of records from the locality is likely to reflect the highly mobile and nomadic behaviour of the species and its seasonal use of habitat. However, neither the development footprint nor the wider locality between Rylstone and Lue is mapped under the BAM as habitat important for supporting critical life stages of the species.

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of the Regent Honeyeater becoming extinct because an impact would cause a further decline the geographic distribution of the species or it would further reduce the population size of the species. Information to support consideration of whether the project is likely to have a SAII on Regent Honeyeater is provided below.

The project would not directly impact a known population, breeding habitat or habitat identified as important to the species under the BAM. The DCA Biodiversity Advisory notes that the while

the development footprint is not identified as critically important to the species, it is likely to contribute to the broader network of foraging and movement habitat available within the region. As such, the proposed clearing is more likely to contribute to cumulative loss of regional foraging habitat rather than result in the loss of key breeding and foraging areas.

Bowdens Silver proposes to undertake a revegetation program to restore 100 ha of Box Gum Woodland within derived native grassland or cleared land. This restoration would contribute to a long-term increase in the extent of potential foraging habitat however it would not immediately compensate for the loss of existing foraging resources. The DCA notes that given the baseline condition of the proposed revegetation and rehabilitation areas, there may be a substantial lag between the removal of established foraging habitat and restored areas being capable of providing comparable foraging resources and habitat function for the species.

Swift Parrot

The Swift Parrot (*Lathamus discolor)* is a threatened entity at risk of SAII because it has undergone a rapid rate of decline (Principle 1). The species has experienced a substantial population decline, estimated to be between 78.8% and 94.7% over three generations, with the current population estimated to be approximately 750 individuals. The species is migratory and occurs across a broad geographic range extending from Tasmania to Queensland. The principal threats to the species include habitat loss and degradation within its breeding and non-breeding range and predation within breeding areas.

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of the Swift Parrot becoming extinct because an impact would cause a further decline the geographic distribution of the species. Information to support consideration of whether the project is likely to have a SAII on Swift Parrot is provided below.

The project would impact approximately 385 ha of potential foraging habitat for the Swift Parrot. Although no Swift Parrots have been recorded within the development footprint, the area contains PCTs capable of providing foraging resources for transient individuals. In a similar manner to the Regent Honeyeater, the DCA notes that low numbers within the locality reflect the highly mobile and nomadic behaviour of the species, however, neither the development footprint nor the locality is mapped under the BAM as important habitat.

The project would not directly impact a known population, breeding habitat or habitat identified as important to the species under the BAM. The DCA considers that the proposed clearing is more likely to contribute to cumulative loss of regional foraging habitat than result in the loss of habitat critical to the persistence of the species.

The proposed 100 ha restoration/revegetation of Box Gum Woodland would provide future habitat for the species, however, the DCA notes there may be a substantial lag between the loss of established foraging habitat and the restored areas being capable of providing equivalent resources.

Large-eared Pied Bat

The Large-eared Pied Bat (*Chalinolobus dwyeri)* is a threatened entity at risk of SAII because it relies on caves, overhangs and other rocky structures that are difficult to replicate, restore or offset (Principle 4).

An impact is to be regarded as serious and irreversible if it is likely to contribute significantly to the risk of the Large-eared Pied Bat becoming extinct because an impact would impact habitat critical to the species that cannot be replicated. Information to support consideration of whether the project is likely to have a SAII on Large-eared Pied Bat is provided below.

The project would impact approximately 6.07 ha of rocky bat habitat for the Large-eared Pied Bat. Under the BAM, breeding habitat includes both mapped rocky habitat and a surrounding 100 metre buffer. The project would impact approximately 90 ha[4] of breeding habitat and approximately 385 ha of foraging habitat for the species. However, approximately 72 ha of potentially suitable rocky habitat has been mapped outside the development footprint within the surrounding locality, the majority of which would remain undisturbed.

Large-eared Pied Bats were recorded within the project area during surveys and two lactating females were captured near the western boundary of the site, indicating that a maternity site[5] may occur within the local area. However, despite targeted surveys and inspections of rocky habitat, no maternity site was identified within the development footprint. The DCA noted that while a maternity site may occur in the broader locality, most mapped and potential rocky habitat occurs outside the development footprint and more than 500 metres from proposed mining activities.

The key uncertainty is whether a maternity cave occurs within the development footprint. If the maternity site would not be impacted by the project, the project would affect a relatively small proportion of suitable rocky habitat in the locality, while substantial areas of comparable habitat remaining would remain available to support the local population. The BDAR concludes that the

[4] The BDAR notes that this is likely an over-representation of the actual amount of rocky bat roosting habitat present within the project site and a worst-case scenario of habitat removal

[5] A maternity site is a location where female bats give birth and form nursery colonies

remaining population would remain viable and connected, and displaced individuals could access nearby roosting and foraging habitat.

To address this uncertainty, Bowdens Silver has committed to undertaking additional investigations prior to construction to determine whether the maternity site occurs within the development footprint.

If a maternity site is found within the development footprint, Bowdens Silver has committed to:

- avoiding impacts where practicable through design refinement;
- restricting decommissioning of maternity habitat to periods outside breeding and hibernation season;
- investigating opportunities to augment existing structures (caves, overhangs) that do not presently provide suitable microbat habitat, to improve their suitability for the species; and
- locating, protecting and managing maternity habitat outside of the development footprint at a 1:1 ratio (i.e. equivalent to number of maternity sites found in the development footprint). Subject to property ownership, the maternity site(s) would be managed on an ongoing basis through the establishment of a funded, perpetual conservation agreement to provide long-term habitat protection and management outcomes for the local population of Large-eared Pied Bat.

The DCA considered that confirmation a maternity site is not present within the development footprint is important to determining the final SAII risk and recommended that this information be provided before construction commences. The DCA also advised that should a maternity site be identified, all reasonable opportunities to avoid impacts through redesign and micro-siting should be investigated. The DCA noted that the proposed mitigation commitments exceed those provided for comparable projects, particularly the commitments relating to protection of off-site maternity habitat and installation of supplementary roosting structures.

Conclusion and recommended conditions - biodiversity

An updated biodiversity assessment has been undertaken in accordance with contemporary methods which has led to changes to the type and quantum of vegetation that would be disturbed, along with ecosystem and species credits. Overall, the updated biodiversity assessment does not materially change the Department's overall conclusions in its 2022 assessment report that the project's impacts on biodiversity values are acceptable.

The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the biodiversity impacts of the project subject to

amendments to reflect the updated vegetation type and credits, along with some inclusions to the biodiversity management plan condition to reflect additional minimisation commitments– see Appendix D for recommended wording of the revised biodiversity conditions.

Greenhouse Gas Impacts

In May 2025, Bowdens Silver provided an updated greenhouse gas (GHG) assessment prepared by EMM Consulting Pty Ltd (EMM) prepared in accordance with the *NSW Guide for Large Emitters*. EMM updated that GHG assessment in August 2025 to address a request by the Department to consider updated modelling on the NSW Government Net Zero Emissions Dashboard and climate change in the locality of the project. The GHG assessment was updated for a third time in June 2026 to consider the progressive decarbonisation of the electricity grid and some additional potential upstream and downstream emissions.

Scope 1 and 2 emissions

Based on the most recent GHG assessment, EMM estimated the total Scope 1 and Scope 2 GHG emissions over the life of the project (including construction, operations, decommissioning and rehabilitation) would be 567,559 t CO_2^{-e}. Of this, around 80% would be Scope 1 emissions (primarily associated with diesel consumption) and around 20% would be Scope 2 emissions (associated with electricity consumption), with the remainder largely from vegetation clearing within the first 5 years of the project – see Figure A2. Average annual Scope 1 emissions would be 21,542 t CO_2^{-e} per year and average annual Scope 2 emissions would be 5,485 t CO_2^{-e} per year.

These Scope 1 and 2 emissions represent between 0.004% and 0.077% of projected annual total NSW emissions between 2026 and 2046 (average 0.04%), and up to 0.013% of projected total annual Australian emissions between 2026 and 2046 (average 0.008%). See further discussion below about total emissions including Scope 3 upstream and downstream emissions.

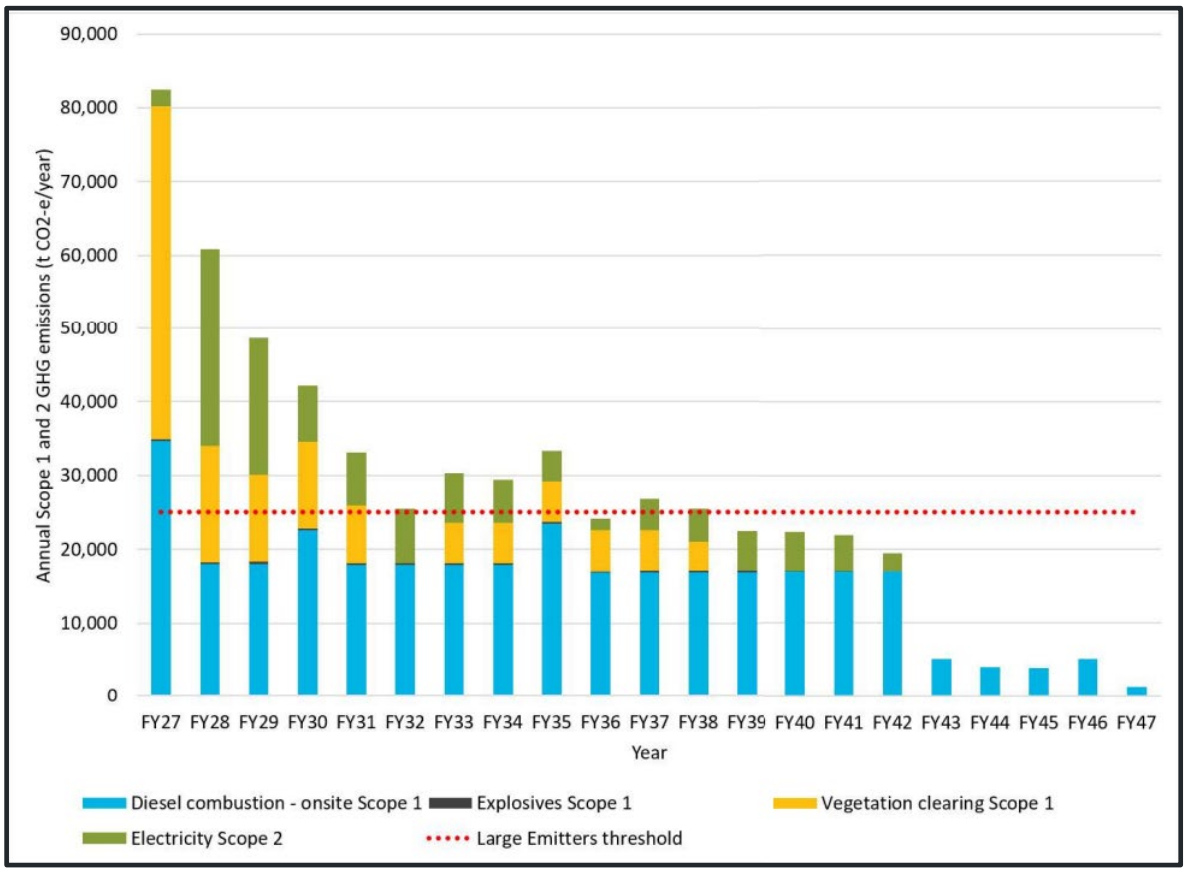

Figure A2 | Annual Scope 1 and Scope 2 greenhouse gas emissions

The NSW Department of Climate Change, Energy, the Environment and Water publishes detailed emissions data on the NSW Net Zero Emissions Dashboard. This shows how NSW is tracking towards its Net Zero emissions targets. **Figure A3** below shows the project's estimated Scope 1 emission reduction trajectory [6] for each financial year compared to the projected average NSW emissions reduction trajectory as shown on the NSW Net Zero Emissions Dashboard[7].

Scope 2 emissions are not shown as these emissions would reduce as the grid decarbonises, as shown in **Figure A2** above. Overall, the project emissions trajectory remains below the NSW emissions trajectory, noting that emissions are higher in the first 5 years as a result of vegetation removal.

[6] Assumes the project commences in 2027

[7] Based on the business as usual scenarios with emissions adjusted based on the designed abatement and timelines in existing NSW and Commonwealth policies and programs)

Department of Planning, Housing and Infrastructure

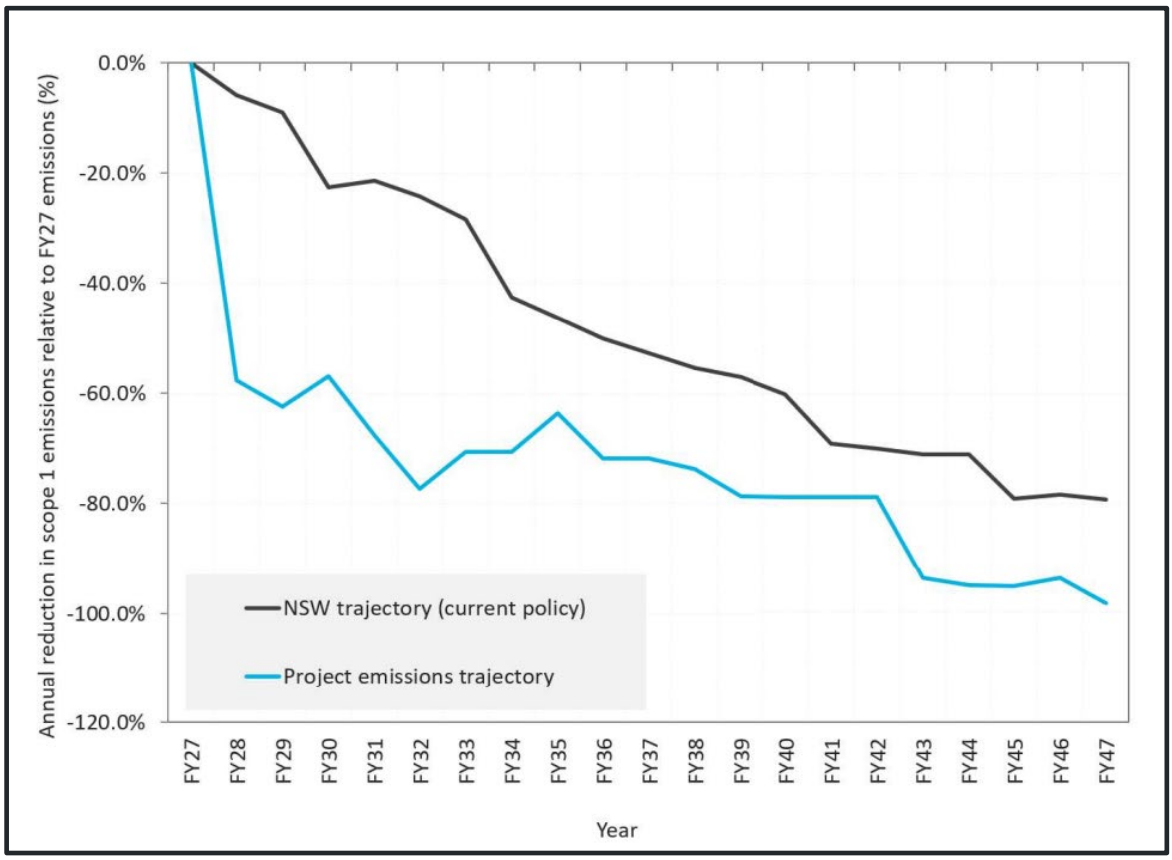

Figure A3 | Project emissions trajectory compared to NSW emissions trajectory (based on current policy)

Bowdens Silver would be required to prepare and implement a *Climate Change Mitigation and Adaptation Plan* (or similar) in accordance with requirements provided by the EPA under the *Protection of the Environment Operations Act 1997*. This plan would outline how the company would reduce emissions over time.

Bowdens Silver has identified that emissions reductions could be achieved by using electric mining (EV) vehicles or conversion of mobile fleet to renewable diesel/biodiesel options over time, when this becomes commercially and financially viable. While larger open cut EV of the appropriate size are not yet commercially available, the company proposes to include one smaller battery electric loading vehicles in its fleet to reduce diesel consumption.

The company has also noted that around 340 ha of land would be revegetated in addition to the biodiversity offset strategy.

The Department has also provided consideration in **Appendix C** of this document of the guiding principles in section 8 of the Net Zero Future Act.

GHG emissions and impacts on the locality

In addition to Scope 1 and Scope 2 emissions, Scope 3 emissions are predicted to be 567,470 t CO_2^{-e} over the life of the project, with this estimate including smelting of ore in overseas jurisdictions. That is, total Scope 1, 2 and 3 GHG emissions over the life of the project are around 1.14 Mt CO2-e.

It is important to consider the significance of these emissions and how they could contribute to climate change impacts at the locality of the development. The information provided by the applicant in the updated GHG assessment contextualises the contribution of the development to localised impacts.

This assessment draws on AdaptNSW high level regional climate projections for the Central West and Orana region, where the project is located, including predicted changes to the number of hot days, severe weather days and rainfall changes, and the significance of these changes to agriculture, water resources and hazards, infrastructure and regional economies.

The assessment documents that the project's Scope 1, 2 and 3 emissions are negligible in the context of its overall contribution to global emissions and therefore the development itself would not contribute to climate change impacts at the local level. Importantly, the Department notes that the metals proposed to be produced, particularly silver, play a role in the energy transition as materials for batteries, electrical vehicles and renewable energy componentry.

Conclusion and recommended conditions – GHG emissions

Overall, the updated GHG assessment does not materially change the Department's assessment of the project as outlined in its 2022 assessment report.

The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the greenhouse gas impacts of the project but recommends revisions to require a standalone greenhouse gas mitigation plan consistent with the CCMAP requirements. The Department notes that any CCMAP developed as part of an environment protection licence would meet the requirements of this plan once prepared and published – see **Appendix D** for recommended wording of the revised GHG conditions.

Aboriginal Cultural Heritage Assessment

Access Archaeology was engaged by the Mudgee Regional Action Group to review the Aboriginal cultural heritage assessment report (ACHAR) for the project. Access Archaeology made a range of criticisms that relate to the methodology, reporting and interpretation of the Aboriginal

cultural heritage assessment. The Department notes that many of the matters relate to administrative detail, reporting preferences or general archaeological propositions rather than demonstrated project deficiencies of material relevance to the assessment of the project.

Nevertheless, the Department requested Bowdens Silver to provide a response to the matters raised. The response was prepared by Landskape Natural and Cultural Heritage Management (Landskape), which also prepared the original ACHAR for the project.

Key issues raised by Access Archaeology include that the assessment relies on assumptions regarding disturbance and subsurface archaeology that were not tested through excavation, that no detailed artefact analysis was undertaken, and that the assessment underestimates archaeological significance because it gives excessive weight to prior site disturbance and oversimplifies criteria such as integrity and representativeness.

Access Archaeology also comments that the assessment overemphasises proximity to major water sources and underestimates the reliability of local water resources, resulting in an overly restrictive predictive model.

The Department notes that test excavations are invasive and generally the need for test excavation prior to determination depends on whether project-specific evidence indicates there is a reasonable likelihood that intact, potentially high-significance deposits occur. In this case, Landskape identifies that the landscape context, shallow soils, disturbance history and archaeological evidence indicate significant intact deposits are unlikely and surface investigations were sufficient to assess the significance of archaeological values on the site.

Nevertheless, Landskape has recommended subsurface investigations are undertaken during post-approval mitigation to inform salvage and management and also notes that detailed artefact analysis is routinely undertaken prior to disturbance during mitigation of Aboriginal sites.

In relation to the consideration of the significance of Aboriginal values on the site, the methodology adopted by the applicant is consistent with an accepted approach used in SSD assessments and aligns with the applicable guidance for investigating and assessing Aboriginal cultural heritage. While it is recognised that land-use disturbance does not, of itself, preclude a site from possessing high archaeological significance, such significance would ordinarily be supported by project-specific evidence, such as unusually high artefact density, assemblage diversity, site integrity, rare site types or other characteristics distinguishing the site from comparable archaeological resources within the landscape.

Existing disturbance, geomorphology and soil context are legitimate factors in assessing the likelihood of intact deposits and the necessity for further investigation. Neither Access

Archaeology's review nor the project-specific archaeological evidence demonstrates that the recorded sites possess characteristics that would reasonably support a materially different significance assessment

In relation to the predictive modelling of Aboriginal occupation and relationship to water sources, Landskape acknowledges that archaeological sites may be encountered beyond watered locations but notes that proximity to reliable water remains a well-established predictor of Aboriginal occupation. Furthermore, the project survey results support this relationship, and the available hydrological evidence supports the interpretation of local water reliability.

Overall, Landskape contends the assertions made by Access Archaeology are based on subjective methodological preconceptions and misconceptions about the cultural and natural landscape of the project area, and that the results and conclusions of the ACHAR are valid and align with relevant environmental planning instruments, guidelines, policies, and plans.

Conclusion Aboriginal heritage

The Department has considered the expert review together with the applicant's response and does not consider there is any evidence demonstrating that the original assessment was materially deficient or that the findings and conclusions of that assessment are invalid.

The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the Aboriginal heritage impacts of the project.

Human Health Risk Assessment

Environmental Risk Sciences Pty Ltd (EnRisks) reviewed the human health risk assessment (see **Appendix E14**) and confirmed that the methodology applied in the assessment remains current and that the conclusions of low and acceptable risks, including for lead exposure, remain relevant.

EnRisks also responded to the review of the lead risk assessment by Dr Barlow. In this regard, the key comments made by Dr Barlow (and in other representations) relate to the blood lead level used to benchmark health impacts from lead; perceived uncertainties in the lead deposition rates and in the dust emissions modelling that underpin the human health risk assessment; lead impacts on agriculture; and the perceived failure of authorities to protect children from lead in Broken Hill, Port Pirie, Mount Isa and Cadia.

The Department notes that these issues were raised previously in submissions and were addressed in previous responses provided by Bowdens Silver.

The Department also notes that comparisons with lead from mining at Broken Hill, Port Pirie and Mount Isa are not relevant as those operations include lead smelting and heat processing that would not occur at the Bowdens mine. Additionally, lead in the environment around Broken Hill is the result of more than 100 years of mining under an entirely different regulatory framework.

In relation to the blood lead goal used in the human health risk assessment, representations make reference to the use of a blood lead goal of 5 micrograms per decilitre of blood (µg/dL). One representation referred to a recent study indicating there is an association between school achievement and a one unit increase in blood lead levels in children with blood lead levels <3.5 µg/dL. Dr Barlow also referred to recent changes made by the US Centre for Disease Control and Prevention, which revised the blood lead reference value (which is used to identify where blood lead levels in children are higher than background and where further investigation and action is required) from 5 µg/dL to 3.5 µg/dL.

To be clear, EnRisks did not use a blood lead goal of 5 µg/dL. EnRisks used a toxicity reference value (TRV) based on the intake of lead (from all sources) that would result in blood lead levels of 3.5 µg/dL for children and 1.6 µg/dL for adults.

As noted in the Department's assessment report, EnRisks calculated that the exposure to lead from all sources (background lead assumed to be present in the environment as well as lead distributed by mining activities) would be less than 40% of the TRV at the nearest property. That is, the estimated total intake of lead for someone living at the worst affected property would be less than 40% of the intake needed to cause a blood lead level of 1.6 µg/dL in adults and less than 31% of the intake needed to cause a blood lead level of 3.5 µg/dL in children.

EnRisks selected the benchmark blood lead levels of 3.5 µg/dL for children and 1.6 µg/dL for adults based on an approach developed by the UK Department for Environment, Food and Rural Affairs (DEFRA), which was based on a review of studies that informed the lowest blood lead levels that have been associated with the most sensitive health effects).

Dr Barlow claims the use of the DEFRA blood lead goals modelling does not align with Australian guidelines. However, the Department notes that there is no criteria or guideline for acceptable blood lead levels in NSW. The Australian National Health and Medical Research Council (NHMRC) guidance for managing lead (*Managing individual exposure to lead in Australia – A guide for health practitioners)* notes blood lead level <=5 µg/dL is considered normal and therefore recommends further investigation only if a person presents with blood lead levels > 5 µg/dL. The NHMRC guidance also notes that there is clear causal evidence of adverse health effects where blood lead levels are 10 µg/dL and higher, but the evidence is less clear below that level.

The Australian Drinking Water Guidelines also adopt a blood lead goal of 5 µg/dL, while the Australian guideline for lead in soil for the assessment of site contamination was established based on a blood lead level of 10 µg/dL.

Consequently, the selection of TRVs based on the DEFRA approach results in a more conservative assessment than the use of screening values in other Australian guidelines.

Some representations have commented that community blood testing has found no lead in blood in the community and suggest that the assessment overestimates the amount of existing lead in the environment. They consider this overestimation downplays the contribution from the mine.

The submissions report clarified that soil sampling within and around the mine site found lead concentrations ranging from 1.5 milligrams per kilogram (mg/kg) to 1,380 mg/kg, with values typically <50 mg/kg away from the proposed open cut pit area. The human health risk assessment assumed a background level of 50 mg/kg. This is a conservative assumption to ensure the overall risks to the community from lead exposure are not underestimated. However, in response to these same concerns, which were raised previously in submissions, the submissions report also included a sensitively analysis using a soil lead level of 13.3 mg/kg. This sensitivity analysis showed that the overall exposures from lead would not significantly change as existing exposures are dominated by dietary intakes.

If exposures to existing lead are discounted, the estimated intake of lead by a child living at the closest privately owned residence to the mine (now owned by the mine) and exposed to 70 years-worth of dust deposition from the mine would be about 2.8% of the intake needed to cause a blood lead level of 3.5 µg/dL, and the intake of lead by an adult living at that residence would be about 4.8% of the intake needed to cause a blood lead level of 1.6 µg/dL. Total lead intake at residences located further away from the mine would be significantly less.

Dr Barlow and others raised concerns about the deposition rate of lead. The concerns appear to be premised on the interpretation that the background lead dust deposition rate would be 0.001 g/m^2/month, a figure that was used in the air quality assessment (and corrected to 0.0001 g/m2/month in the submissions report) to describe the average deposition rate for lead based on samples collected from a dust deposition gauge between 2012 and 2015. This figure does not represent the *predicted* deposition rate of lead from the mine.

EnRisks provided supplementary advice in relation to the corrected figure for background lead dust deposition rate (see **Appendix E28**) noting that the use of a higher background lead deposition rate is conservative as it overstates the potential total (background + project) lead deposition rate.

The predicted deposition rates for lead and other metals used in the human health risk assessment were derived from the air quality model. That is, the air quality assessment estimated the metal content in emissions of total suspended particulates (TSP) to air and then modelled the dispersion and deposition of those metals at each sensitive receivers (noting that only a portion of the emitted material will deposit at a given location and deposition rates would vary by receivers, generally diminishing with distance from the source).

The maximum lead deposition rate at the closest privately owned residence (which is now owned by the mine) is predicted to be 0.7667 mg/m^2/year. This maximum deposition rate was conservatively used in the human health risk assessment for all receivers, even though deposition rates at residences further from the mine would be lower.

Dr Barlow references recent research suggesting that a lead dust deposition "action level" of 100 µg/m^2/30 days (or 3.3 µg/m^2/day) is needed to protect children's blood lead level. In this regard, it is noted that the maximum predicted deposition rate of lead from the mine of 0.7667 mg/m^2/year equates to 2.1 µg/m^2/day, which is well below that action level.

Dr Barlow and other representations raised concerns about the impacts of lead on agriculture, including vineyards and olives, and the impacts on drinking water from water tanks (which many in the community rely on).

These impacts were assessed in detail in the human health risk assessment. The modelling of deposition to, and uptake of, fruit and vegetables (including vine crops and olives) showed that the concentrations of lead in produce would be so low they would not be measurable; and the modelling of deposition to rainwater tanks showed that the change in concentration of lead and other metals in rainwater tanks would not be measurable in an analysis of water.

EnRisks has noted that the Australian Drinking Water Guideline for lead was revised in 2025 from 0.1 mg/litre to 0.005 mg/litre (based on intakes of lead resulting in a blood lead level of 5 µg/dL). In this regard the concentrations of lead in existing rainwater tanks already exceed the revised guideline (average of 0.0059 mg/L and maximum of 0.037 mg/L), likely due to the presence of lead in roofing materials. The maximum modelled change in concentration of lead in rainwater tanks as a result of the project is 0.000004 mg/litre, which is well below the revised guideline level.

Dr Barlow and other representations raised concerns about the air quality model that underpins the human health risk assessment. The concerns identify perceived uncertainties in the air dispersion modelling and highlight that any underestimation of emissions, or overestimation of

emissions reduction factors or emission controls, would mean that more dust (and lead) would be dispersed.

Some of the representations, including the commentary provided by Dr Barlow, refer to the EPA's initial advice on the EIS, which raised concerns about a number of assumptions used in the air dispersion model, including in relation to the emissions inventory, emissions reduction factors, assumptions about the metal concentrations in waste rock, ore and soil, and the distribution of metals across different particle size fractions.

The Department notes that the matters raised by the EPA were addressed in the Submissions Report and additional information provided by Bowdens Silver, and the EPA did not raise further concerns about these matters.

Nevertheless, Bowdens Silver engaged Todoroski Air Sciences (Todoroski) to review the air quality modelling in light of Dr Barlow's comments. In summary, Todoriski noted that the approach adopted in the air quality assessment is consistent with standard practice, where uncertainties are managed through a combination of conservative assumptions, sensitivity testing, and enforceable management measures, and that the issues identified by Dr Barlow do not represent fundamental deficiencies in the assessment but rather reflect typical areas of uncertainty and professional judgement inherent in air quality modelling.

While modelling indicates the project could comply with the EPA's air quality criteria and the risks of exposure to lead are very low, the Department acknowledges there are inherent uncertainties in modelling. However, these uncertainties would be addressed by the recommended conditions of consent, which include strict limits on dust (as particulate matter) at receivers, and an air quality management plant that details the proactive and reactive mitigation measures that would be implemented to control dust, as well as the monitoring and contingency actions that would be undertaken if lead and other metals deposited in dust exceed the levels anticipated in the modelling.

Some representations expressed concern that once lead is detected in dust it would be too late to prevent harm. That is very unlikely. As noted above, the human health risk assessment assumes 70 years of accumulated lead exposure and yet demonstrates that intakes of lead from the project would be negligibe.

Conclusion - human health risk assessment

The Department has considered the expert review together with Bowdens Silver's response and does not consider there is any evidence demonstrating that the original assessment was materially deficient or that the findings and conclusions of that assessment are invalid.

The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the human health impacts of the project.

Economics

There have been no changes to legislation or policy that would require an update to the economics assessment. However, Gillespie Economics (Gillespie) reviewed and updated the economics assessment to account for changes to forecast commodity prices, international monetary exchange rates, and estimated capital expenditure and operating costs.

As a result of these changes, Gillespie Economics estimates:

- global net production benefits would be $823 M instead of $98 M, and the net production benefit (net social benefit) to NSW would now be $341 M instead of $44 M;
- royalties to the NSW Government would be $58 M instead of $21 M;
- non labour expenditure in the area would be $27 M (was $30 M), but incremental disposable wages accruing to the local area would be $2.2 M/yr during construction and $9.2M/yr during operations (instead of $1.8 M/yr during construction and $6.8 M/yr during operations); and
- with flow on effects, the project would directly and indirectly add 212 jobs, $23 M/yr in income, and $61 M/yr in value to the regional economy during construction; and directly and indirectly add 317 jobs, $42 M/yr in income and $232 M/yr in value to the regional economy during operations.

Overall, the economic benefits of the project to NSW are now estimated to be significantly greater than the original estimates, largely based on significantly higher forecast annual revenues.

Other Issues

The Department's consideration of other issues is summarised in **Table A3** below

Table A3: Outcomes of other reviews.

Key Assessment Issue	Relevance of Changes to Guidance
Air Quality	Ramboll Environment and Health (Ramboll) reviewed the air quality assessment for the project. The air quality assessment for the project was undertaken in accordance with the *Approved Methods for the Modelling and Assessment of Air Pollutants in NSW* which was in force at the time (2016 Approved Methods). This guideline reflected the criteria in the *National Environment Protection (Ambient Air Quality) Measure 2015* (NEPM). The NEPM was revised in 2021 and in August 2022 the EPA published the current Approved Methods (2022 Approved Methods) which aligns the assessment criteria for NO_2, SO_2 and O_3 with the revised NEPM standards. Ramboll's review has considered the assessment against the 2022 Approved Methods. The EPA has also recently released a draft revised Approved Methods (Draft Approved Methods March 2026) for consultation. Although the Draft Approved Methods is not currently in force, Ramboll's review also includes consideration of the Draft Approved Methods as it is intended to replace the 2022 Approved Methods. Ramboll confirmed that the air quality modelling methodology, key inputs and assumptions, and overall assessment framework are consistent with the current 2022 Approved Methods and largely align with contemporary expectations. The air quality impact assessment predicted that the project would comply with all relevant criteria in the 2016 Approved Methods at all sensitive receivers (for $PM_{2.5}$, PM_{10}, TSP, dust deposition, metal concentrations in air and hydrogen cyanide). This project would also comply with the criteria in the 2022 Approved Methods. The Draft Approved Methods propose that the assessment of metal concentrations should consider the maximum 1-hour concentrations as opposed to the average 1-hour concentration and has introduced a criterion for respirable crystalline silica (RCS), which was/is absent from the 2016 Approved Methods and 2022 Approved Methods. Ramboll notes the assessment of metal concentrations was based on the 1 hour 99.9th percentile average (consistent with the 2022 Approved Methods) but, given the predicted concentrations are so far below the relevant criteria, exceedances of the maximum 1-hour criteria are unlikely. The highest predicted concentrations relative to

Key Assessment Issue	Relevance of Changes to Guidance
	the criteria at any sensitive receivers are 10.4% of the criterion for arsenic, 0.2% of the criterion for lead in air and 2% of the criterion for hydrogen cyanide. The 2016 Approved Methods did not include a criterion for RCS and the air quality assessment adopted a criterion of 3 µg/m^3 based on guidance from other jurisdictions. The Draft Approved Methods also proposes a criterion of 3 µg/m^3 and consequently, the assessment of RCS remains consistent with the Draft Approved Methods. The assessment predicted that the RCS from the project would be 7% of that criterion. Since the air quality assessment was prepared, Bowdens Silver has acquired additional properties around the mine, including receivers R4 and R7. R4 was predicted to have the highest cumulative 24-hour PM_{10} concentrations and dust deposition rates, while R7 was predicted to have the highest cumulative annual average TSP, PM_{10} and $PM_{2.5}$ concentrations. The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the air quality impacts of the project.
Noise	SLR Consulting Australia Pty Ltd (SLR) reviewed the noise assessment for the project. SLR noted there have been no changes to legislation, policy or guidance that would require an update to the assessment, and SLR noted there are no new developments or other significant noise sources that would materially change the background noise levels (and consequently the noise trigger levels), and no significant changes in road traffic volumes. Consequently, the finding in the noise impact assessment would still be applicable. Bowdens Silver's acquisition/ agreement of residences R27 and R86 mean that noise limits at those properties are no longer required. The Department has recommended the removal of those properties from the noise limits table in the conditions. Apart from the removal of those residences from the conditions, the Department considers that there are no changes to the noise environment or assessment that would materially alter the Department's findings and conclusions in relation to these impacts, and that the conditions would be adequate to manage the noise impacts of the project. Some representations raised concerns about low frequency noise and how this is considered. Low frequency noise was accounted for in the noise modelling for the project in accordance with the procedures in the *Noise Policy for Industry*.

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Key Assessment Issue	Relevance of Changes to Guidance
	The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the noise impacts of the project, subject to the recommended changes as outlined in **Appendix D**.
Groundwater	Jacobs reviewed the groundwater assessment for the project to determine whether there were any factors that would alter the assessment outcomes. The key change identified by Jacobs relates to impacts on groundwater dependent ecosystems (GDE)s. At the time the groundwater assessment was prepared there were no high-priority GDEs listed in the relevant water sharing plans in the vicinity of the site or within the area of predicted drawdown. However, amendments to some water sharing plans since then have included updates to the GDE mapping and, as a result, some vegetation within the development footprint and within the zone of predicted drawdown to the southwest of the mine site is now identified as a high-priority GDE. The GDE within the mine development footprint would be cleared and this impact has been considered in the BDAR (and accounted for in the credit calculations). The mapped GDE south of the mine is unlikely to be significantly impacted by project-related groundwater drawdown, as groundwater occurs at depths exceeding 10 m below ground level and below the likely rooting depth of the vegetation. Consequently, Jacobs considers that project related groundwater drawdown is unlikely to affect the long-term viability of the GDE. Additional baseline data has been collected on groundwater levels. However, Jacobs notes the range of water levels observed during the model calibration period is similar to that of the later data and model calibration is still representative of the range of environmental stresses that may occur. The updated baseline data does not change the hydrogeological understanding or outputs of the groundwater model. There are no changes proposed to the project and no new bores located within the predicted area of drawdown. Accordingly, Jacobs concluded that in general, the predicted groundwater drawdown, impact pathways and assessment conclusions presented in the groundwater assessment (as updated during the assessment) remain unchanged. The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the groundwater impacts of the project.

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Key Assessment Issue	Relevance of Changes to Guidance
Surface Water	WRM Water and Environment (WRM) reviewed the surface water assessment for the project to determine whether there were any factors that would alter the assessment outcomes. WRM noted there have been no material change to the background environment that would affect the conclusions of the surface water assessment. The *Flood Risk Management Manual* (Department of Planning and Environment, 2023) was released in June 2023 and replaces the *Floodplain Development Manual*, which was considered in the flood impact assessment. However, WRM considers the changes in the new *Flood Risk Management Manual* do not affect the approach or assumptions used in the flood assessment. However, WRM updated the flood model to account for climate change in accordance with additional guidance that was introduced into the *Australian Rainfall and Runoff – Climate Change Guidance for Flood Assessment* in 2024, to determine whether this would affect the outcomes of the flood assessment. The updated flood model indicates there could be increases in discharges and water levels under existing conditions throughout the project area when accounting for climate change. However, the relative impacts of the project in terms of changes in peak flood levels and flow velocities are similar to those identified in the surface water assessment, and there would be no material changes to the predicted flood impacts of the project. WRM also updated the final void water balance to account for new climate change projections published in the NSW Australian Regional Climate Modelling Project (NARCLiM). The effect of the changes on the final void water balance is to reduce the predicted maximum long-term final void water levels by around 3.5 m. However, there would be no material changes to the outcomes described in the surface water assessment. Overall, WRM concluded that the surface water modelling approach, assumptions and design events remain appropriate and consistent with current guidance; that impacts on surface water flows, flooding, water quality and receiving environments predicted in the surface water assessment have not materially changed; and that the proposed mitigation, monitoring and management measures remain adequate and valid. Representations raise various concerns about the TSF. Comments include the potential for failure, overflow, seepage, and the risks associated with a fault identified beneath

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Key Assessment Issue	Relevance of Changes to Guidance
	the TSF and the long-term integrity of the proposed TSF liner. These matters were all raised in submissions and considered in the Department's assessment. In summary, the TSF would be a "declared dam" under the *Dams Safety Act 2015* and would be regulated by Dams Safety NSW. The most stringent criteria were used in the design based on Dams Safety NSW, Australian National Council on Large Dams (ANCOLD) and NSW EPA guidelines for dam design, including minimum storm storage allowance and contingency freeboard to reduce the risk of overtopping in an infrequent/rare rainfall event, emergency spillway capacity to safely convey peak flows of extremely rare rainfall events (1 in 10,000 year events), and a liner to limit seepage. The recommended conditions include strict performance measures for the design, construction and operations of the TSF. The submissions report noted that the Meadow Fault, which transects the TSF area, is not present in the overlying Sydney Basin sediments and has been inactive for at least 160 million years, and that hydrogeological investigations in the project area indicate that the regional scale fault systems act more as barriers to groundwater flow than conduits. Any potential for locally increased permeability would generally be captured in the bulk order of magnitude increase in hydraulic conductivity utilised for the TSF modelling uncertainty assessment. In relation to potential long-term deterioration of the liner, the Department notes that, while this may occur over long timeframes, the main risk to water quality would be while the TSF is being used for water storage during mining. Once mining ends, water infiltration would be limited as the TSF would be rehabilitated with a cover designed to shed water. Representations also raised concerns about aspects of the water balance modelling including some of the assumptions used, including catchment sizes and reliance on stream flow information from the Cudgegong River instead of the Hawkins Creek to establish stream flows and. The key concern for the community in this regard is whether there would be sufficient water to manage dust (lead). The Department considered these matters in its assessment of the project. The Department is satisfied that the assumptions were justified and notes that an uncertainty analysis was provided. Importantly, the strict limits on dust at receivers means Bowdens Silver would be required to prioritise water for dust suppression (or use a chemical dust suppressant)

Key Assessment Issue	Relevance of Changes to Guidance
	and, in a dry year if water becomes scarce, the company may be required to reduce the processing and/or mining rate to match the available water supply. Representations commented on the apparent discrepancy between estimates of rainfall and runoff expected to be captured by the project and estimates of baseflow losses. The reason for the difference is that not all rainfall infiltrates and recharges the groundwater system, and not all groundwater becomes baseflow. A significant proportion of rainfall is lost to evapotranspiration. Furthermore, in disturbed catchments, runoff (rather than infiltration to groundwater) typically increases due to less permeable surfaces. Representations also raised concerns about aspects of water licensing, including the applicability of water extraction rules for surface water take caused by baseflow losses. The Department notes that rules for surface water extraction typically apply to active take of water through bore extraction rather than induced take caused by drawdown because of mining. The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the surface water impacts of the project.
Traffic and Transport	The Transport Planning Partnership (TTPP) reviewed the traffic and transport impact assessment for the project to determine whether there were any factors that would alter the assessment outcomes. The traffic and transport impact assessment was prepared in accordance with the *Guide to Traffic Generating Developments*, which has since been superseded by the *Guide to Transport Impact Assessment in* 2024. Although this new guideline does not apply, TTPP notes the approach, methodology and principles in the traffic and transport impact assessment are consistent with the latest guideline. TTPP identified that projected background (non-project) traffic conditions assumed for the traffic and transport impact assessment have changed, with an increase in traffic likely from renewable energy projects in the area and changes to traffic from other mines in the area, as well as changes to the expected start date of the project. Accordingly, TTPP updated the traffic assessment to account for changes to projected background (non-project) traffic volumes over the life of the project. Estimates of background traffic numbers are based on new traffic surveys undertaken in 2025 on

Key Assessment Issue	Relevance of Changes to Guidance
	key access routes, and also considers cumulative traffic from other major developments in the region. Based on these changes to background traffic conditions, the level of service (LoS) experienced by drivers on the key transport routes and intersections proposed to be used by the project is predicted to remain acceptable and there would be sufficient capacity on the road network to accommodate the construction and operational traffic generated by the project The Department considers that the conditions imposed by the IPC in the now voided development consent remain suitable for managing the transport and traffic impacts of the project.
Social Impacts	The social impact assessment (SIA) was undertaken in accordance with the *Social Impact Assessment Guidelines for State Significant Mining, Petroleum Production and Extractive Industry Development* 2017, which has since been superseded by the *Social Impact Assessment Guideline (NSW Government* (February 2023) (current SIA guideline). The new guideline does not strictly apply to the project as the application was lodged prior to the release of the updated guideline. Nevertheless, Square Peg Social Performance Pty Ltd (Square Peg) has reviewed the SIA and provided a supplementary SIA report that considers the current SIA guideline and the social and economic changes that have occurred since the original SIA was completed. The supplementary SIA report relies on the consultation that was undertaken for the EIS, supplemented by targeted meetings and interviews with a sample of community members selected to provide a geographic balance, a balance of perspectives, and representation from Aboriginal and Torres Strait Islander people. Square Peg identifies that the recent consultation outcomes broadly align with the outcomes of the original consultation that was undertaken, although key changes discussed in consultation focused on migration of people into the area, escalating house prices, Bowdens Silver's acquisition of properties and the large number of renewable energy projects proposed for the region. The supplementary SIA report identifies that the key changes since the original SIA was undertaken include:

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Key Assessment Issue	Relevance of Changes to Guidance
	• increased pressure on housing markets and social infrastructure and services due to population growth in the area since the COVID pandemic and multiple renewable energy projects proposed for the region; • concerns around perceived negative impacts on other industries, particularly the visitor economy, that did not feature strongly in the original SIA for the project; and • continued concern around perceived lead contamination and the ongoing impact to community cohesion, particularly in Lue and surrounds. These changes affect some of the significance ratings assigned to some of the social impacts, with Square Peg considering that, from a social significance point of view, the potential impacts on housing and services, amenity, and connection to land and culture are of high significance rather than moderate significance, and the social significance of potential impacts from the TSF would be moderate instead of high. Nevertheless, Square Peg concludes that most of the findings in the original SIA remain relevant and the proposed mitigation and enhancement measures would generally be adequate, although Square Peg also recommended some additional mitigation measures to address the cumulative impacts on accommodation and health services, and dedicated engagement with Aboriginal stakeholders and nearby tourism and agricultural operations to understand their concerns. The Department recommends that these additional mitigation measures be implemented and has provided revisions to the voided conditions of consent as outlined in **Appendix D**.
Agriculture	There are no new policies or guidelines that would change the agricultural assessment. R.W. Corkerys (Corkerys) reviewed the agricultural impact statement and notes that land use within the immediate locality of the mine remains consistent with that described in the agricultural impacts assessment, and the baseline agricultural conditions remain largely unchanged. Corkerys also notes there are no new impact pathways or changes that would result in compounding or amplification of impacts identified in the agricultural impact statement. Consequently, in the absence of any material changes to the environment of agricultural context, Corkerys considers the findings and conclusions of the agricultural impact assessment remain valid. The Department concurs with this conclusion.

Key Assessment Issue	Relevance of Changes to Guidance
Contaminated Land	Bowdens Silver provided an updated land contamination assessment (see **Appendix E28**) including a preliminary site investigation (PSI) to inform the consent authority as required under *State Environmental Planning Policy (Resilience and Hazards) 2021*. Based on this review it reaffirmed the conclusions of the original assessment that the land was suitable for the proposed development and that there are no major impediments due to land contamination. As previously advised, the Department considers that the project would not have a significant risk of existing contamination and that the proposal is generally consistent with the aims, objectives, and provisions of this SEPP.

Conclusion

There have been a number of changes to legislation, policy and guidelines since the application was initially referred to the IPC, and some changes to the background environment that affect the assumptions underpinning the economics, traffic, and social assessment. However, the updated assessment indicate that these changes do not significantly increase or change the adverse impacts of the proposed project.

No amendments to the project are being proposed and consequently there are no significant changes to the biodiversity impacts from that previously determined by the IPC. However, the updated biodiversity assessment in accordance with contemporary methods means the type and quantum of vegetation that would be disturbed has been redefined, which also has ramifications for species impacts.

Representations have also raised concerns with the proposal. Although most of the issues raised in these representations were already considered in the Department's assessment, the Department has considered whether there are any new matters that would change the Department's conclusions. Based on the information provided, the Department does not consider that there are any new issues that would significantly alter the assessment conclusions.

The new information does not fundamentally change the Department's previous assessment and conclusions about the merits of the project overall as documented in the report "*Bowdens Silver Project – State Significant Development SSD 5765*" dated December 2022.

The Department also considers that the conditions imposed by the IPC in the now voided development consent would generally remain suitable for managing the impacts of the project, with some changes including:

- **administrative conditions** – e.g. changes to agency names, definitions; schedule of land updates
- **biodiversity conditions** – the Department recommends conditions that reflect contemporary biodiversity conditions, including the identification of offset credits;
- **noise receivers** – Bowdens Silver has acquired, or entered into agreements with the owners of the receivers identified as R27 and R86 and consequently noise limits at those properties are not required;
- **social impacts** – the recommendations for additional mitigation measures made in the social impact assessment review have been incorporated into the requirements of the social impact management plan; and
- **greenhouse gas emissions** – inclusion of a standalone greenhouse gas mitigation plan that is consistent with the EPA's proposed CCMAP requirements.

The Department's recommended changes to the conditions are provided in **Appendix D**.

Appendix B - Transmission Line

Background

The Bowdens Silver Mine (the project) is a proposed open cut silver, lead and zinc mine that would be located approximately 2 kilometres (km) north of the village of Lue in the Mid-Western Regional Council area.

The mine would extract and process around 30 million tonnes (Mt) of ore (up to 2 Mt per annum) to produce a silver/lead concentrate and a zinc concentrate. The mine would comprise a main open cut pit, two satellite pits, and mine site infrastructure including a processing plant, waste rock emplacement, ore stockpiles, a tailings storage facility and ancillary infrastructure. The project would also involve the relocation of an approximately 5 km section of a local road (Maloneys Road) and the realignment of part of a 500 kilovolt (kV) transmission line owned by TransGrid.

Electricity for the mine is expected to be provided via a new 66 kilovolt (kV) transmission line that would connect the mine to the existing electricity grid. This transmission line is not part of the proposed project.

Bowdens Silver has not selected an alignment for the transmission line but has advised that its preferred option is to connect to an existing transmission line owned by Endeavour Energy in the Camboon/Breakfast Creek area.

Although the transmission line may be constructed by Bowdens Silver, it would ultimately be owned and managed by Endeavour Energy, and the final alignment and design would be developed in consultation with any impacted landholders.

Community members have expressed concern that the transmission line would not be assessed if it is not part of the project. Indeed, this was a key aspect to the legal challenge to the project.

It is likely that the relevant planning pathway for the transmission line would be under Part 5, Division 5.1 of the *Environmental Planning and Assessment Act 1979* (EP&A Act) and the associated provisions of Part 2.3, Division 5 of the *State Environmental Planning Policy (Transport & Infrastructure) 2021*. That is, Endeavour Energy, as an Authorised Network Operator (ANO) under the *Electricity Network Assets (Authorised Transactions) Act 2015,* would be the determining authority for that activity (development).

In exercising its determination powers as an ANO, Endeavour Energy would be required to comply with the *Guidelines for Division 5.1 Assessments*. These guidelines were developed to ensure that

assessments under Part 5 are conducted appropriately and in a manner that supports proper environmental assessment, including community consultation. It provides a framework for the decision-making process and includes procedures for carrying out assessments, requirements for documentation, and protocols for consultation. A copy of the guideline is available on the Department's website at Guidelines for Division 5.1 Assessments

Notwithstanding any detailed assessment that would need to be undertaken when the final alignment is selected, Bowdens Silver has undertaken a high-level assessment of the general area where the transmission line is likely to be located. This includes identifying key constraints and consideration of the potential impacts if the transmission line were to be constructed in that area. These are summarised below.

Transmission Line

The general area within which the new transmission line is likely to be located is identified by the dashed purple boundary in **Figure B1** below (referred to hereafter as the study area).

From desktop studies, Bowdens Silver has identified that much of the land in the study area has been cleared and is used for agriculture, but there is also some remnant native vegetation including forests. There are 26 plant community types, including 12 that are associated with six threatened ecological communities. Nine threated species have also previously been recorded within the area.

There are no known European historical heritage sites in the area. A preliminary Aboriginal cultural heritage assessment identified 12 Aboriginal cultural heritage sites have been previously recorded in route corridors under consideration, and 'landscape features' as described in the *Due Diligence Code of Practice for the Protection of Aboriginal Objects in New South Wales* are also present within the study area, including landforms within 200 m of watercourses and land within 200 m of cliff faces. Aboriginal objects are often associated with these landscape features.

The transmission line would be above or below ground within an easement that would be around 18 metres (m) wide and potentially up to around 20 kilometres (km) long. Construction would involve ground disturbance within the easements, transmission tower footings, laydown pads for construction equipment, access tracks, sediment and erosion controls etc.

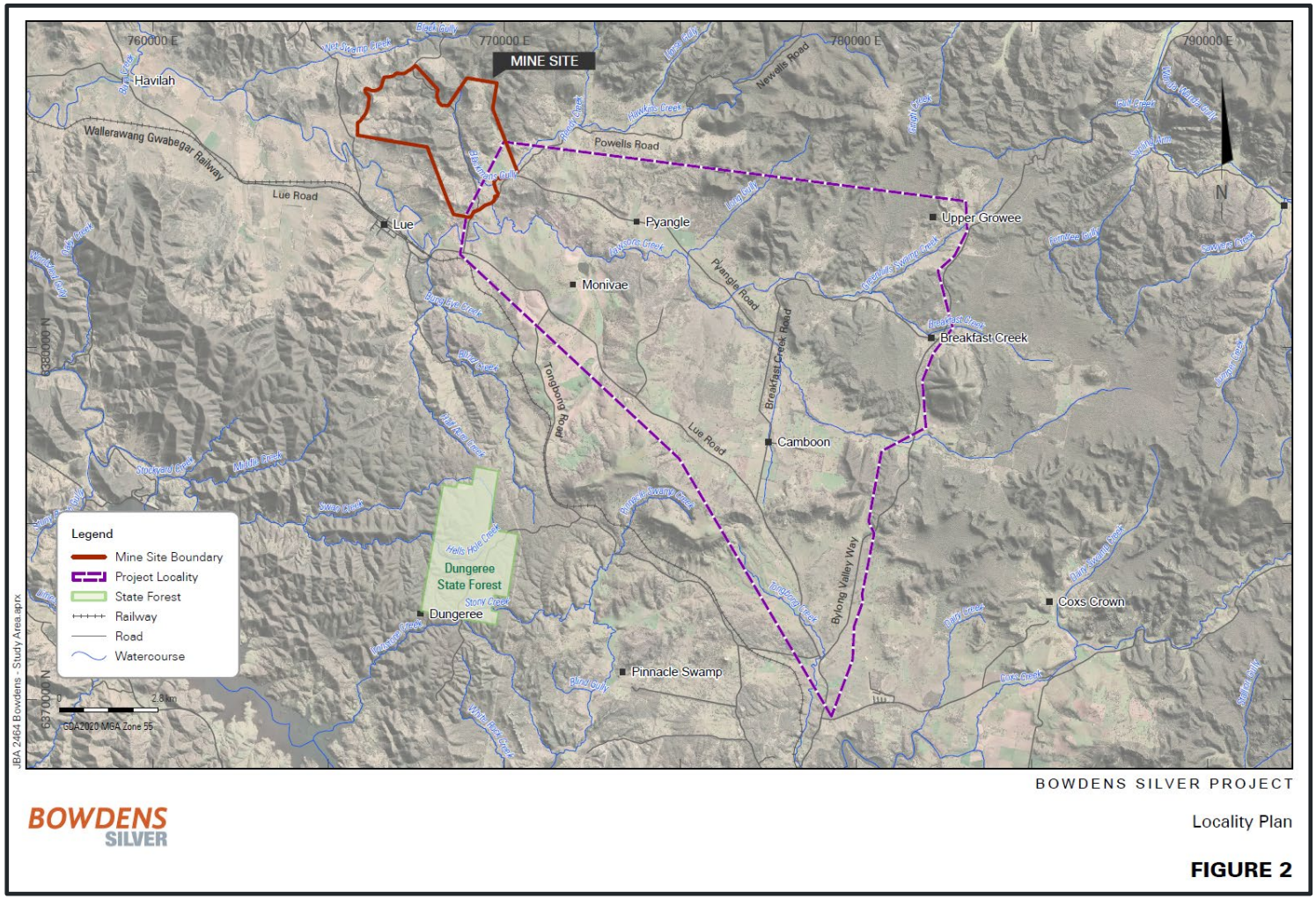

Figure B1 | Likely locality of 66 kV transmission line

Indicatively, up to around 30 ha of land could be disturbed. However, Bowdens Silver has noted that the final alignment could be selected to minimise or avoid impacts on high value features, including threatened ecological communities or plant species and Aboriginal heritage objects. This includes siting the transmission line within existing infrastructure corridors and/or adjusting the alignment around or under (using horizontal directional drilling) sensitive biodiversity features.

The transmission line would potentially have some visual impacts if visible from private residences or public vantage points.

Construction of the transmission line would generate greenhouse gas emissions, dust, noise, and traffic that may adversely affect people's amenity. However, these impacts would likely be for a relatively short period of time.

Ground disturbance during construction can cause erosion and sedimentation of nearby streams, although these can generally be managed through appropriate erosion and sediment controls.

Conclusion

Overall, the Department considers that, subject to further detailed assessment of the proposed final transmission line alignment and applying standard avoidance, mitigation and offsetting principles, the high-level review undertaken by the applicant indicates there are no significant impediments to connect the Bowdens Silver Mine to the local transmission grid.

Appendix C - Guiding Principles of the Climate Change (Net Zero Future) Act 2023

Table D1: Consideration of the principles of the Climate Change (Net Zero Future) act 2023

Guiding Principle	Consideration
1) For this Act, the guiding principles are the principles set out in this section.	Noted
2) There is a critical need to act to address climate change, which is a serious threat to the social, economic and environmental wellbeing of New South Wales.	Noted
3) Action to address climate change should be taken as early as possible to minimise the cost and adverse impacts of climate change.	The project's Scope 1 and Scope 2 GHG emissions would represent a small proportion (between 0.004% and 0.077%) of project annual total NSW emissions between 2026 and 2046. The applicant has committed to including one battery electric vehicle into its fleet and the applicant would be required to detail how it would further reduce emissions in a *Climate Change Mitigation and Adaptation Plan.*
4) Action to address climate change should be taken in a way that— a) is fiscally responsible, and b) promotes sustainable economic growth, and c) considers the economic risks of delaying action to address climate change, and d) considers the impact on rural, regional, and remote communities in New South Wales.	The environmental impacts from the project can be managed in accordance with the recommended conditions of consent and the project would deliver economic benefits to the region and the State. The total GHG emissions from the project (including Scope 3) would have a negligible impact on climate change impacts in the locality and region.
5) Action to address climate change should be consistent with the right to a clean, healthy and sustainable environment.	Based on its assessment, the Department concluded that the project can be developed in a way that avoids, minimises or mitigates impacts to the environment, and that risks to human health are very low and can be managed

Guiding Principle	Consideration
	subject to the strict recommended conditions.
6) Action to address climate change should be consistent with the principles of ecologically sustainable development described in the *Protection of the Environment Administration Act 1991*, section 6(2).	The Department has considered the principles of ESD as described in the *Protection of the Environment Administration Act 1991* in Appendix C of its Assessment Report.
7) Action to address climate change should involve appropriate consultation with affected persons, communities and stakeholders.	The Department received advice from Mid-Western Regional Council and 14 government agencies including NSW Environment Protection Authority, which is the lead regulator of greenhouse gas emissions in NSW. During the exhibition period for the EIS, 1,905 submissions were received, of which 1,503 supported the project and 384 objected. An additional 130 submissions were received during the exhibition of the first amendment, of which 119 were objections. 302 submissions were received during the exhibition of the second amendment, of which 268 were objections. The Department has considered the submissions in the assessment of the project. A public hearing was also held by the IPC which further considered public and expert submissions.
8) Action to address climate change should take into account the following—	See below
a) the knowledge and perspectives of Aboriginal communities,	The environmental impact statement for the project included an Aboriginal cultural heritage assessment which included consultation with Aboriginal stakeholders. The total GHG emissions from the project would make a

Guiding Principle	Consideration
	negligible climate change impact on the locality/ region including on Aboriginal cultural heritage values.
b) the best available science,	All technical assessments supporting the EIS including the Greenhouse Gas Assessment were prepared by suitably qualified persons in accordance with relevant guidelines. Relevant assessments were reviewed by government agencies and the Department's independent expert.
c) the knowledge of rural, regional and remote communities in New South Wales,	The project included three formal exhibition periods and submissions from Mid-Western Regional Council, special interest groups and community members have informed the Department's assessment.
d) the need to support local communities, including Aboriginal communities, who may be affected by the action, including by— (i) considering the impact on local employment and industries, and (ii) diversifying local economies, and (iii) encouraging local procurement, and (iv) optimising job creation and employment transition opportunities, and (v) considering the impact on the amenity of local communities,	The project would deliver economic benefits to the local and regional economy through procurement and employment, creating approximately 131 FTE jobs during construction and up to 210 during operation. The project is estimated to be able to provide approximately $44 million NPV to the NSW economy and would generate a range of flow-on economic benefits. It would also provide local training and employment opportunities. The Department considers that the impacts associated with amenity including noise, vibration, dust, and visual have been integrated into the Department's overall assessment and can be managed through the proposed mitigation measures and recommended conditions.

Guiding Principle	Consideration
e) the need for education and skills diversification,	The Applicant indicated it would implement strategies to increase the level of local employment on the project, including providing traineeships, apprenticeships and scholarships which would provide the opportunity for education and skills diversification.
f) the need to ensure essential utilities and infrastructure are provided, including energy, water, telecommunications and transport,	Silver, lead and zine are typically used for a range of industrial purposes. In particular, these metals support the renewable energy transition as silver has the highest thermal and electrical conductivity of all metals and is used in photovoltaic cells, while lead and zinc are both used to make batteries.
g) the impact of the action on consumer costs in New South Wales, including energy costs,	
h) the need to reduce the risk climate change poses to human health,	The project's greenhouse gas emissions would represent a small contribution to NSW GHG emissions which is below reporting requirements under the Safeguard Mechanism. The project would therefore be generally consistent with State and Commonwealth strategies to address climate change, as assessed in further detail the Department's Assessment Report and in the additional information provided by the applicant and considered by the Department.
i) equity and social justice impacts on socially disadvantaged groups and economically vulnerable regions,	
j) the need to reduce the risk climate change poses to the survival of all species.	
9) Action to address climate change should take into account the impact on animals.	The Department considers that the project has been designed to minimise environmental and biodiversity impacts as much as practicable. From a climate change perspective, the project's total emissions, including Scope 3 emissions, would make a negligible contribution to climate change impacts, including to biodiversity, in the locality and region

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Guiding Principle	Consideration
	based on its contribution to global emissions.
10) The Government of New South Wales is responsible for— a) urgently developing and implementing strategies, policies and programs to address climate change, and b) ensuring the Government of New South Wales pursues best practice in addressing climate change.	Noted

Appendix D – Recommended Changes to Voided Development Consent (SSD 5765)

The Department recommends that the IPC amend the voided development consent conditions for SSD 5765, as set out in Table D1.

Table D1 – Recommended Changes to IPC voided development consent (SSD 5765)

Ref. Condition No.	Change Type	Recommended Change	Reason / Justification
Definitions	Amendment	**BCD:** Replace all references to "BCD" with "CPHR" throughout the consent and where relevant. Update the definition to mean "Conservation Programs, Heritage and Regulation Group within the NSW Climate Change, Energy, the Environment and Water"	Administrative update
Definitions	Amendment	**Department**: Update the definition of "Department" to mean "NSW Department of Planning, Housing and Infrastructure"	Administrative update
Definitions	Amendment	**DPE Water:** Replace all references to "DPE Water" with "DCCEEW Water" throughout the consent and where relevant. Update the definition to mean "Water Group within the Department of Climate Change, Energy, the Environment and Water"	Administrative update
Definitions	Amendment	**EIS:** Amend the definition to include: • the additional information dated June 2026 and titled "Department of Planning, Housing and Infrastructure Request for Information Response", including all attachments; and • the updated Biodiversity Development Assessment Report dated August 2026 including cover letter dated 4 August 2026	To ensure the consent references the most current assessment documents
Definitions	Amendment	**Heritage NSW:** Update the definition of "Heritage NSW" to mean "Heritage NSW within the Department of Climate Change, Energy, the Environment and Water"	Administrative update

Ref. Condition No.	Change Type	Recommended Change	Reason / Justification
Definitions	Amendment	**MEG:** Replace all references to "MEG" with "NSW Resources" throughout the consent and where relevant. Update the definition to mean "NSW Resources within the Department of Primary Industries and Regional Development"	Administrative update
Definitions	Amendment	**Resources Regulator:** Update the definition of "Resources Regulator" to mean "NSW Resources Regulator within the Department of Primary Industries and Regional Development"	Administrative update
Condition B5, Table 2 - Operational Noise Criteria; and **Condition B6, Table 3 – Noise criteria during transmission line realignment**	Amendment	Remove receivers R27 and R86 from Table 2 and Table 3	Reflects the updated noise assessment and receiver schedule
Condition B31(c)(ii)	Amendment	Remove "and Greenhouse Gas" from the subheading. Remove the following bullet points in condition B31(c)(ii): • minimise the development's Scope 1 and 2 greenhouse gas emissions; and • improve the development's energy efficiency	Greenhouse gas requirements are proposed to be consolidated within a standalone Greenhouse Gas Mitigation Plan condition
Condition B32	Amendment	Remove "and Greenhouse Gas".	Consequential amendment from the introduction of a standalone Greenhouse Gas Mitigation Plan condition
Condition B34	Amendment / Renumbering	Renumber Condition B34 as Condition B33 and remove the words "and Greenhouse Gas".	Consequential amendment from the introduction of a standalone Greenhouse Gas Mitigation Plan condition

Ref. Condition No.	Change Type	Recommended Change	Reason / Justification
Condition B33	Amendment/ Replacement	Replace existing Condition B33 with the following new Condition B34: "**Greenhouse Gas Mitigation Plan** B34.Within six months of the date of commencement of development under the consent, unless otherwise agreed by the Planning Secretary, the Applicant must prepare a Greenhouse Gas Mitigation Plan for the development. The plan must: (a) be prepared in consultation with the EPA; (b) be consistent with the EPA's guideline "*Emissions Reporting and Climate Change Mitigation and Adaptation Plans – Guidance for Environment Protection Licensees*" (March 2026, or latest version); (c) include a detailed review of the feasibility of implementing various greenhouse gas abatement options, and economic considerations for the mine site; and (d) include a three year action plan generally in accordance with the commitments in the documents in condition A2(c) of schedule 2, that is updated every three years and assesses the feasibility of greenhouse gas mitigation technologies and identifies measures to be applied to the project. *Note: As required under the EPA's guideline "Emissions Reporting and Climate Change Mitigation and Adaptation Plans – Guidance for Environment Protection Licensees, March 2026", impacted licensees will be required to prepare and implement a Climate Change Mitigation and Adaptation Plan by 31 August 2027. With the approval of the Planning Secretary, the preparation and implementation of this plan could be used to meet the requirements of condition B34.*	Introduction of a standalone Greenhouse Gas Mitigation Plan condition

Ref. Condition No.	Change Type	Recommended Change	Reason / Justification
Condition B53, Biodiversity Offsets	Amendment/ Replacement	Replace existing Table 8 with new "Table 8: Residual native vegetation impacts and biodiversity credit obligation", based on Table B1 in Appendix B. Insert new "Table 9: Species credit obligations", based on Table B2 of Appendix B. In the Notes to Condition B53, remove first bullet point: • *"The credits in Table 8 were calculated in accordance with the Framework for Biodiversity Assessment of the NSW Biodiversity Offset Policy for Major Projects (OEH, 2014) and must be converted to reasonably equivalent 'biodiversity credits' within the meaning of the BC Act."*	Reflects the updated BDAR and biodiversity offset obligations
Condition 54(e), Biodiversity MP	Amendment	Amend Condition 54(e) by inserting the following sub conditions: • implement pre-clearance protocols for buildings and structures occupied by microbats; • implement adaptive management measures for unplanned cyanide pooling within the TSF; • implement active fauna deterrent measures for the TSF; • implement adaptive management measures for Koala encounters and vehicle strike records; • implement soft-felling procedures for trees occupied by greater gliders; and • implement species-specific impact avoidance and harm minimisation measures for Pink-tailed Legless Lizard.	Reflects the biodiversity mitigation requirements detailed in the updated BDAR and DCA advice.

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Ref. Condition No.	Change Type	Recommended Change	Reason / Justification
Condition B89 – Social Impact Management Plan	Amendment	Amend Condition B89(d) by inserting the following stakeholders: • Aboriginal stakeholders and communities; and • local tourism and agricultural businesses Amend Condition B89(f) by inserting the following additional matters to be managed and mitigated: • cumulative impacts on housing and accommodation availability and affordability; • cumulative impacts on local health and community services; and • impacts on local tourism and agricultural businesses	Reflects the updated social impact assessment and recommended additional mitigation measures
Appendix 1 - Schedule of Land		Replace Appendix 1 in its entirety with the updated Appendix 1 below.	Updated to reflect transfer of crown land to applicant and changes since prior determination (see **Appendix E29**
Appendix 4 – Biodiversity Offsets	Amendment/ Replacement	Replace Appendix 4 in its entirety, including the heading, with "Appendix 4 Credit Retirement Staging", as set out below	Reflects the updated biodiversity offset staging and disturbance

Appendix 1 Schedule of Land

Lot/DP						
Mine Site						
Lots in Deposited Plans						
61/755412	76/755412	178/755412	3/755412	42/755412	73/755412	74/755412
107/755412	102/1124638	2/572701	140/755435	119/755435	127/755435	3/572701
4/572701	86/755435	143/755435	132/1050074	1/1171691	1/835810	118/755435
25/755435	26/755435	161/755435	1/814633	2/814633	11/810747	122/755435
121/755435	1/1118167	2/776858	7007/1029353**	7008/1029652**	Part of Lot 82/755435	Part of Lot 1/1306834
3/1308249	4/1308249	5/1308249	3/776858	3/835810	Part of Lot 3/1299604	
Other Land						
• Un-named Crown Road on eastern boundary of 121/755435, 122/755435, 1/814633, 26/755435 and thence running approximately north-northeast through 26/755435, 25/755435 and 118/755435 • Un-named Crown Road between 118/755435 and 25/755435 • Un-named Crown Road from Powells Road to the eastern boundary of 2/776858 south of 82/755435 • Hawkins Creek from section forming the western boundary of 82/755435 to the point it meets the western boundary of 4/776858 • Former Crown Road on western boundary of 7008/1029652 (Licence Number LN 600680) • Lawsons Creek (Pyangle Road crossing) • Maloneys Road (From Pyangle Road intersection through to the northern boundary of 102/1124638) • Pyangle Road (From Maloneys Road intersection south through to Lue Road) • Lue Road (Council Road) South of 1/8/758365 and 3/758365						
Relocated Maloneys Road						
Lots in Deposited Plans						
102/1124638	61/755412	76/755412	178/755412	3/755412	2/755412	18/755412
101/1124638	197/755412	7002/1029653**	11/755412	Part of Lot 6713/1291132^		
Other Land						
• Bara-Lue Road (Council Road) through 2/755412 and 101/1124638 • Lue Road (Council Road) south of 7002/1029653 and running through B/163287 • Lawsons Creek (section forming the southern boundary of 11/755412 and the northern boundary of 197/755412, and section between 18/755412 and 197/755412) • Un-named Crown Road on eastern boundary of 101/1124638, and turning westwards between 101/1124638 and 178/755412 • Un-named Crown Road running east west through 101/DP1124638.						
Notes: ** Crown Land Lot ^ Owned by Transport Asset Manager of New South Wales						

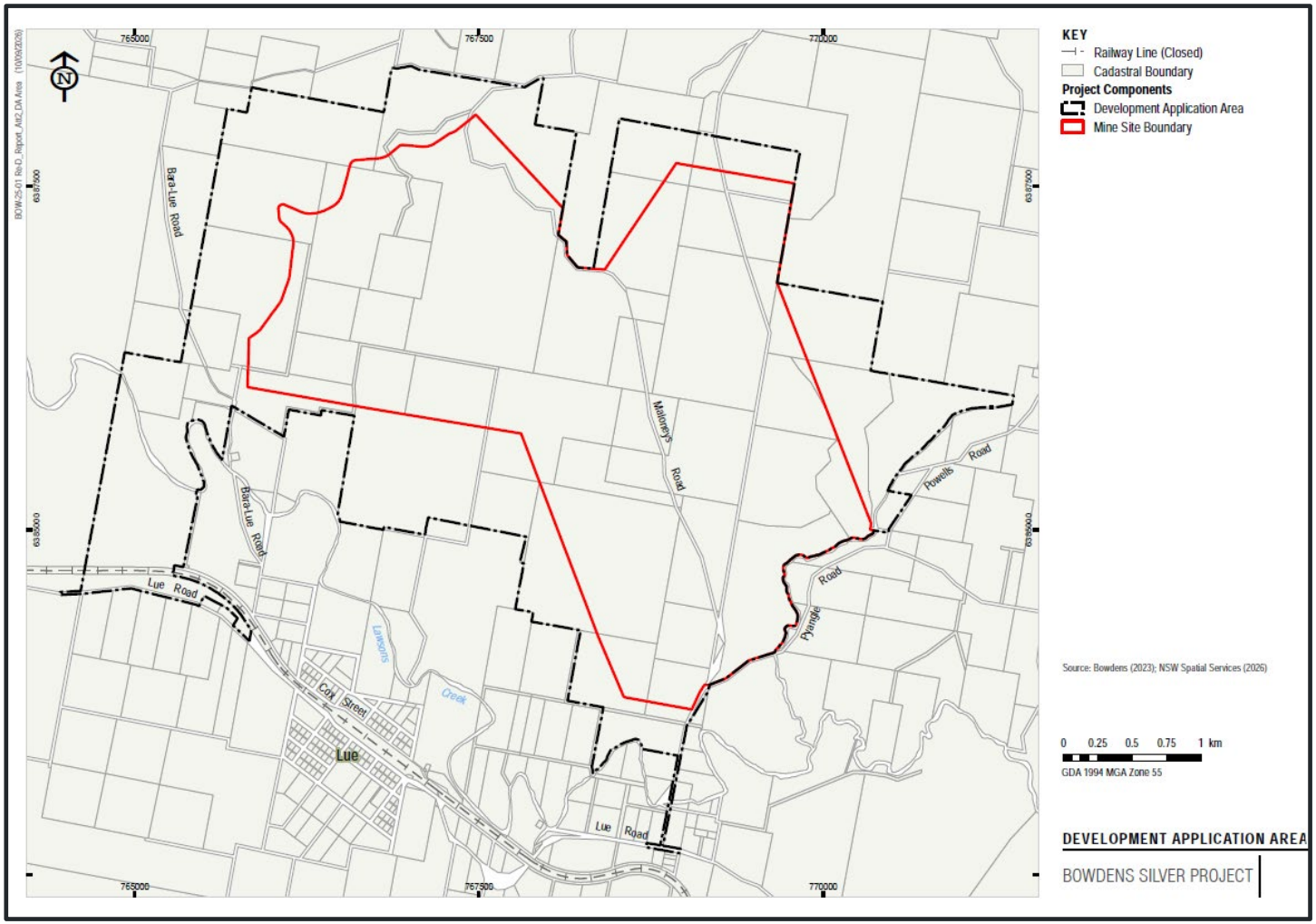

Figure A1.1 – Development application and mine site area

Appendix 4 Credit Retirement Stages

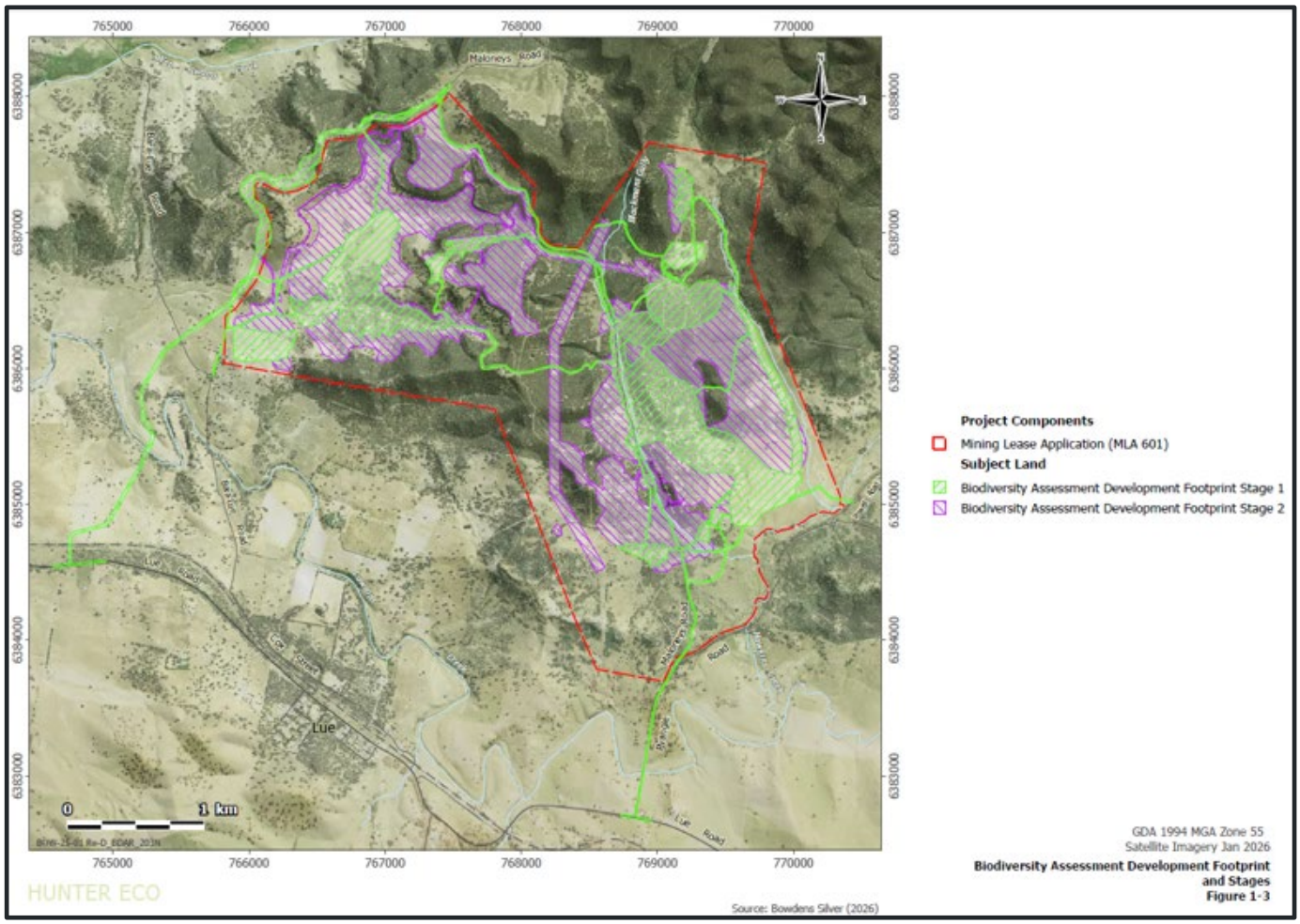

Figure A4.1 – Biodiversity credit obligation stage 1 and 2

Appendix E – List of Referenced Documents

All documents referenced below are publicly available under the "Additional Information" heading under the 'Assessment' tab on the Major Projects Portal at: https://www.planningportal.nsw.gov.au/major-projects/projects/bowdens-silver

Additional information

Ref. No.	Document titled:	Date
E1	DPHI letter to Bowdens - re-determination	9 December 2024
E2	Bowdens letter to DPHI - re-determination	13 December 2024
E3	Planning Secretary's Determination available – Powerline	23 May 2025
E4	Bowdens Response - Supplementary Information Report	11 July 2025
E5	Bowdens Response - Revised GHG Assessments	7 August 2025
E6	Dr Cynthia Barlow report - Clarification on EPA 2020 Comments and Blood Lead Level (BLL) Concerns	19 August 2025
E7	Access Archaeology report	June 2025
E8	Bowdens Updated Assessment - Main Text	June 2026
E9	Bowdens Updated Assessment - Att 1: Planning Secretary's Determination – Powerline	June 2026
E10	Bowdens Updated Assessment (June 2026) - Att 2: Powerline Environmental Effects Review	June 2026
E11	Bowdens Updated Assessment (June 2026) - Att 3: Statutory Considerations	June 2026
E12	Bowdens Updated Assessment (June 2026) - Appendix A: BDAR	26 June 2026
E13	Bowdens Updated Assessment (June 2026) - Appendix B: ACHA Review	26 June 2026
E14	Bowdens Updated Assessment (June 2026) - Appendix C: HHRA Review	29 June 2026

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Ref. No.	Document titled:	Date
E15	Bowdens Updated Assessment (June 2026) - Appendix D: SIA Supplementary Report	June 2026
E16	Bowdens Updated Assessment (June 2026) - Appendix E: Economic Review	18 June 2026
E17	Bowdens Updated Assessment (June 2026) - Appendix F: Traffic and Transport Review	18 May 2026
E18	Bowdens Updated Assessment (June 2026) - Appendix G: Noise and Vibration Review	24 June 2026
E19	Bowdens Updated Assessment (June 2026) - Appendix H: Air Quality Assessment Review	23 June 2026
E20	Bowdens Updated Assessment (June 2026) - Appendix I: Greenhouse Gas Assessment Review	26 June 2026
E21	Bowdens Updated Assessment (June 2026) - Appendix J: Groundwater Assessment Review"	22 June 2026
E22	Bowdens Updated Assessment (June 2026) - Appendix K: Surface Water Review"	29 June 2026
E23	Bowdens Updated Assessment (June 2026) - Appendix L: Agricultural Review	24 June 2026
E24	DCA Advice on BDAR	20 July 2026
E25	Cover Letter – Updated BDAR	4 August 2026
E26	Updated BDAR	4 August 2026
E27	DCA Technical Advisory Advice – State Significant Development Bowdens Silver	19 August 2026
E28	Bowdens Silver Project – Additional Information	20 August 2026
E29	Bowdens Silver Project – Additional Information Regarding Schedule of Land	10 September 2026