

Submission to: Independent Planning Commission of NSW

Project Reference: Bowdens Silver Project SSD 5765

This submission is made in **Support** of the Bowdens Silver Project.

Commentary provided herein will focus on relating my first-hand experience with managing operating mine sites in close proximity to communities in relation to the recommended conditions issued by the Department of Planning and Environment (DPE).

I am a Mining Engineer with over 34 years of international experience, with the majority of that time spent on operating mines that were in very close proximity to small rural communities, some closer than Lue. For more than 15 years I have been a site based General Manager and the person directly responsible for ensuring compliance with regulatory, corporate and social expectations. Unfortunately, at times that has been on mines with long histories, meaning they were initially constructed prior to present day standards and suffered legacy environmental and social issues.

I recently accepted the role of General Manager – Bowdens Silver and am excited to be a leader in demonstrating how technological advancements and genuine corporate social responsibility can provide a pathway to an amicable and mutually beneficial relationship between mine and community. I did not choose this role casually or on the spur of the moment, in fact I had been considering changing jobs and looking for the right opportunity for more than a year. This project specifically appealed to me because of the level of detailed preparation that went into the EIS and mine design, and the company's absolute commitment to preserving the economic viability, social stability and wellbeing of the local communities. After careful consideration of the technical, social and economic merits of this project, I was inspired to be part of it and relocated my family back to Australia from the US.

If approved, I will have overall responsibility for compliance with the recommended conditions (along with other legal, corporate and social requirements) and am confident that they are achievable. Based on my experience, the DPE recommended conditions have adequately recognised and dealt with potential environmental and community impacts. Importantly, the DPE Assessment Report and recommended conditions have not highlighted any risks that cannot be actively managed through available technologies and standard industry practices.

Community and environmental issues I have typically dealt with on mine sites include:

- dust (visibility, health concerns, domestic cleaning, ingress in rain water tanks, vegetation coverage);
- noise (general nuisance, sleep disturbance);
- visual changes to the landscape;

Bowdens Silver Pty Limited ACN 009 250 051

68 Maloneys Road, Lue NSW 2850, PO Box 1115, Mudgee NSW 2850 Ph: 02 63736420

www.bowdenssilver.com.au

- light pollution at night;
- vibration (heavy equipment movements, blasting);
- additional traffic in town;
- mine TSF and WRE seepage (surface and ground water impacts on grazing and farming);
- water draw down on domestic and stock wells; and
- a sense of alienation as community population can be less than the mine population.

In green fields projects in close proximity to rural towns, there is normally an adjustment period for the community members due to changes in the visual landscape and noise levels from increased activity in the area. A highly beneficial aspect of this project is that there are sizeable hills that provide a physical barrier between the mine and the town of Lue. These hills will largely eliminate the visual change impacts and contribute to reducing noise levels over the life of the project.

I believe the DPE recommended conditions relating to dust, noise, vibration levels, and traffic (conditions B1-B27, B59-B67) are adequate and achievable. The technology is readily available to continuously monitor conditions and distribute live data and pre-set trigger level alerts/alarms directly to specific personnel and to staffed control centres. In my experience the process plant control room is the best location to feed all monitoring data as it is the one location on an operating mine that requires an operator to be present on a continuous basis; 24 hours a day, 7 days a week, 365 days a year. But regardless of the data monitoring and distribution technology used, the key to successfully adhering to prescribed environmental criterion is proactive and dedicated management. A pre-emptive alert trigger is of no value if no one reacts to it and the situation escalates to an alarm level where a criterion has been exceeded. Technology is available to ensure that triggered actions from specific monitoring stations go to the appropriate line supervision/management personnel (in addition to the control centre) via various communication devices. The line supervision/management personnel can have a set timeframe to acknowledge and accept responsibility to investigate and implement actions as required. If the set timeframe elapses, the notification can be automatically sent to the next higher level of supervision/management and so on until it would ultimately reach myself. This management approach would ensure that a predetermined response to any given known potential situation or monitorable criterion is consistently applied.

Based on my experience, I consider that DPE recommended conditions B38-B44, B83-B85, C1-C9, and D14 adequately deal with the types of information and due process that community members typically expect which include:

- being provided with scheduled or stage related project/operational updates;
- having access to key monitoring data or reports to government authorities;
- having access to senior mine staff to discuss potential issues or concerns; and
- being confident that the mine will make genuine efforts to resolve real or perceived issues.

In the past I have typically managed these expectations through:

- scheduled community meetings to provide updates on general activities, compliance with relevant operating conditions, project updates and early information about any upcoming projects;
- maintaining an open door policy for community members; and
- having a formal complaints register and resolution process.

In summary, as the person who will be responsible for delivering expected outcomes if the project is approved, I consider the DPE's recommended conditions to be appropriate and achievable. The company has prepared a detailed and comprehensive EIS and developed a wholistic mine plan that can achieve commercial expectations while fostering an amicable and mutually beneficial relationship with the local communities.