

NSW Independent Planning Commission
Suite 15.02, 135 King Street
SYDNEY NSW 2000

Dear Commissioners

Re: Bowdens Silver Project - SSD 5765

As the Managing Director of Silver Mines Limited and Director of Bowdens Silver Pty Ltd, I provide the following submission with regards to the Bowdens Silver Project. These comments are in addition to comments I have made to the Independent Planning Commission during the Public Hearing 15th – 17th February 2023.

These items relate specifically to community and social matters within the Department of Planning and Environment (DPE) Assessment Report and recommended conditions of consent. Technical information relating to these matters has already been presented elsewhere so will not be discussed in detail in this submission.

Information provided also discusses matters that were raised during the Public Hearing and follow on from information already presented by the company at the Applicant Meeting and during the Public Hearing itself.

In its Assessment Report, DPE considers in its evaluation that the *“key issues associated with the project predominantly relate to amenity, health and social impacts on nearby rural residents due to development of a greenfield mine in what is currently primarily an agricultural area.”* This is an important point and one that Bowdens Silver has factored high into its many technical assessments and day to day practices, as in the mind of the Company, words such as amenity, health and social impacts are all in fact, community related items worthy of proper and thorough investigation and assessment. Therefore, it was pleasing to read that the DPE states, *“the Department considers that Bowdens Silver has designed the project in a way that would achieve a practicable balance between maximising resource recovery and minimising associated impacts on the surrounding landholders and the environment through best practice contemporary practices and mitigation measures.”*

From a community perspective, substantial consultation and engagement has occurred throughout our tenure since mid-2016 with relevant stakeholders such as affected and nearby landowners, residents within Lue and surrounds, the

Community Consultative Committee (CCC), Mid-Western Regional Council, the general public and other stakeholders. This has informed our assessments and iterative design changes to mitigate as much as possible any actual and/or perceived amenity impacts, highlight the positive technical outcomes regarding the Human Health Risk Assessment and understand and inform the management of social impacts now and into the future. Importantly, DPE's peer reviews and assessment confirm this.

Prior to the purchase of the Project in 2016, we were aware of a poor legacy of community sentiment concerning the Project. Through our actions outlined above, and more, along with our commitment to being transparent and open in our communications we have been able to fundamentally turn that sentiment around.

At the Public Hearing, there were a number of topics raised regarding potential social impacts in relation to accommodation requirements within the region, potential for impacts to the tourism industry, workforce and employment concerns and the provision and sharing of relevant and meaningful information with the wider community.

Bowdens Silver has previously confirmed acceptance of the DPE recommended conditions of consent, and in relation to items relevant to social impacts, can confirm that the creation of a Social Impact Management Plan as outlined in Condition B83 and related sub-items, can and will form an extension to current activities to drive the management of social impacts.

For instance, consultation with Council and the CCC will continue to seek advisory information to inform on ground activities and share information. A Stakeholder Engagement Framework will be developed that grows upon our current community consultation strategies to ensure that all stakeholders irrespective of opinion, have factual and current information. As an example, engagement with relevant tourism, vineyard and winery stakeholders could focus on providing relevant information and facts on the Project to help those operators answer questions and alleviate the concerns and anxiety raised in recent weeks.

The current Community Investment Program will be developed further to involve community member's input and focus actions and investment into Lue and nearby surrounding towns. Also, our discussions on a potential joint venture with Council will continue in order to produce a Workforce Accommodation Strategy that alleviates housing pressure for locals and tourists alike, while creating opportunities for economic and social injections into the Kandos and Rylstone areas. This would also tie in with a more formalised approach to our support and

use of local businesses and suppliers via a local business strategy in order to share the positive economic and employment benefits throughout the region.

Importantly, Condition B83 also provides opportunity to help alleviate community concerns through the implementation of proactive and reactive management plans and monitor and relay information to the community with factual data and information. While this has been our approach all along, this formalised condition will in many ways, allay a number of community concerns raised during the public submission and Public Hearing processes.

Bowdens Silver has been very clear that it is committed to the ongoing viability of Lue as a place where people can live, work and socialise in. This commitment extends to the actions required to ensure compliance with the necessary and enforceable conditions and management plans that will ensure this.

It is widely recognised and acknowledged that this development will be critically important for the region. I spend most of my time living and working in Lue and like the rest of the Bowdens team, I have invested considerably in understanding the issues faced by our communities as well as by those in the region more broadly.

It has been concerning to see that in some of our regional towns that prospects are so limited for school leavers that many are forced to move further afield to find employment or have little alternatives and go onto welfare. This changes the social and economic fabric of these towns with populations that are increasingly aging or reliant on social assistance. Regional towns need strong businesses like Bowdens Silver to invest in these communities and provide opportunities for a better future.

Bowdens Silver has strong views on education and training. Education is a key component in our workplace and we are very active in the communities on providing aid in education. We see this as a key positive social impact in the communities whether for education and training for our staff and prospective employees including school leavers but also for helping to improve educational facilities and outcomes in other forms at our local primary and secondary schools. We continue to help the schools of Lue, Rylstone and Kandos. We have been involved in mentoring in Max Potential Australia programs locally and we have had work experience school children on the Bowdens Silver site. We have provided assistance to each of the local schools as part of our Community Investment Program. We have an objective in encouraging school leavers and others to come in, undertake training and be the best they can be in the workplace. We have also announced a stewardship program for young indigenous in the

community. I have spoken previously on our activity in tertiary education in encouraging institutions to utilise our project in furthering education. This has been highly successful.

We have credentials in our work in education and we see this as a key component of our management and our operation as a highly positive social impact of the Bowden Silver project.

The success of a business such as Bowdens Silver is reliant on having a strong socially and moral contract with its stakeholders and neighbours. We are committed to working safely and alongside nearby agriculture and other enterprises. We are very proud of that fact and indeed we will continue with our own farming activities alongside our mining activities.

During the Public Hearing Bowdens Silver provided information with regards to a November 2022, Mid-Western Regional Council LGA Community Sentiment Survey undertaken by independent group SEC Newgate Research. The primary purpose of the survey was to update the company and the community on any changes that may have happened in the time between a similar independent survey undertaken as part of the Social Impact Assessment prepared by Umwelt (Australia) Pty Ltd, dated May 2020.

Results from the November 2022 survey data showed that a large majority of people within the LGA (83%) are aware of the Project. For the people surveyed after being provided information on the Project:

68% of people in the LGA supportive of the Project.

66% support in Lue, Rylstone and Kandos.

70% support in Mudgee.

65% support in the rest of the LGA.

17% of people within the LGA were not supportive.

The survey concluded that mining barely registers as an issue of concern among those living in the LGA and around two thirds having a positive sentiment towards the local mining industry.

Of particular note within the demographic of the younger age group (18-39 years old), results indicated 74% were supportive, 19% were neutral while 7% were not supportive.

Participants were asked to nominate the most important issues facing their local area, and mining did not emerge as a “hot button” issue, with only 2% making negative comments.

The following table is an extract from the survey indicating sentiment from those who are aware of the Bowdens Silver Project.

Top Reasons for positive sentiment	%	Top Reasons for negative sentiment	%
Creates employment / more jobs	43	Pollution / poisoning of waterways / chemical leaching into water	9
Generates Growth/investment in local services / infrastructure	14	Heavy metals / air quality / lead dust / lead unsafe	7
Positive sentiment towards mining / need for mining	11	Land impacts / destroys / clears the land / removal of pastoral land	5
Good for local businesses / retailers	6	Environmental impact / environmental damage (other / general mentions)	5
Mining gives back / benefits the community / sponsorship	5	Already too many mines in the area / too much mining	3
Boosts national economy / increases Govt. revenue/ Aust.-owned keeps profits in Aust.	3	Proximity of mining activities / too close to town / schools	3
Positive engagement with the company / trust them / they will do the right thing	2	Impact of extra traffic / more trucks going through town / no parking	3
Good for local real estate market / drives housing prices	2	Impact on wildlife / livestock	1
Won't impact the environment / land restoration is regulated	2	Increases to cost of living / housing prices	1
Training / upskilling opportunities for locals	1	Out-of-town workforce	1
Other	1	Social impact / damages the fabric of community / rips communities apart	1
		Damage to tourism industry	1
		Damage to roads	1

The survey highlighted that there is opportunity for Bowdens Silver to help address a number of other issues deemed as important by local residents through community partnerships and contributions. Such issues include the poor condition of roads and lack of local services.

The November 2022 independent survey is closely in line with the outcomes in the Social Impact Assessment of May 2020 with no significant deviation. Employment creation is by far the most dominant theme across the surveys.

The DPE Assessment Report highlights complexities resulting from any greenfield mining development. Issues primarily relate to the likely amenity, health and social impacts on nearby rural residents in what is currently primarily an agricultural area. The DPE notes that the series of ridges including the prominent “Bingman Hill” that lie between the mine site and the residences in Lue, reduces many of the typical amenity impacts of mining operations. The DPE states *“In that context, the Department considers the site to be generally well-suited for a greenfield mine aimed at accessing Australia’s largest undeveloped silver deposit.”*

In addition, a greenfield operation has significant advantages being a new investment rather than an “add-on” expansion or improvement to an existing operation. The Bowdens Silver Mine Site will be an operation with proven modern technologies across all aspects of the enterprise that would typically be superior to an upgraded older project. A greenfield operation also provides new employment opportunities to the region’s jobs and new opportunities in education and training.

In summary, Bowdens Silver remains confident that the Project is firmly in the public interest as it would provide an acceptable balance of environmental and social outcomes, whilst generating substantial economic and social benefits for the local, regional and State economies. There are many features of the Project that support this conclusion.

- The Project has been designed in accordance with best practice guidance to ensure efficient development while also considering the likely experience of the Mine for the local community and the predicted short term and longer-term environmental outcomes.
- The outcomes of environmental, economic and social assessments for the Project have confirmed that the Project would operate in accordance with the legislation, policies and guidelines developed to ensure responsible environmental practices for development.

- There is a strong indication of the need for environmentally and socially sound projects to support the regional economy, especially in the Lue, Kandos, and Rylstone localities.
- Bowdens Silver would invest \$310 million in capital works upon Project commencement and in the order of \$1.3 billion over the life of the Project.
- The Project is considered to be consistent with the principles of ecologically sustainable development, would satisfy all relevant planning strategies and would achieve the objectives of the Project.
- The environmental, economic and social assessments have not only considered the immediate impacts of the operation but also intergenerational outcomes involving potential land use conflict and residual impacts to resources (such as groundwater). In each case, worst case scenario outcomes were considered to ensure a precautionary and conservative approach to impact assessment was taken.
- The high probability of further expansion and longevity to the Project has been demonstrated and Bowdens Silver has committed to ongoing investment in these opportunities.
- Bowdens Silver has made a range of clear commitments to the public that would be given legal force by way of conditions of a development consent and other leases and licences that would be required.
- The expanded Community Investment Program would ensure that the economic outcomes are distributed locally, while programs for environmental and social monitoring, regular reporting and auditing of performance would ensure that the commitments to responsible environmental management are achieved.
- The legacy of the Project has been considered with regards to the rehabilitation and final land use options and mechanisms to preserve the existing character of Lue, while providing sufficient economic stimulus to ensure its sustainability. The residual environmental outcomes of the Project are not predicted to impose an unacceptable cost to future generations.

Important to this conclusion is also the expected enforcement of conditions of consent, environmental monitoring, reporting and independent auditing that would ensure that outcomes are transparently presented and discussed. Ongoing consultation would continue direct with our neighbours, the wider community and other stakeholders and also through the Community Consultative Committee. Our discussions with some members of the Lue Action Group although convey disagreement, also often convey mutual respect. It is that respect that we look forward to growing throughout our communities should the Project be approved, knowing that positive engagement would continue over the life of the Project.

My team and I are very much looking forward to stepping into the next phase of development for the Project should the Commission agree with our position that the Project is firmly in the public interest, would be appropriately regulated under the proposed conditions of consent and would ultimately have a substantial positive legacy for the region.

I would like to take the opportunity to thank our Board of Directors, our management and staff, all of our specialist consultants and the peer reviewers for their hard work in getting us where we are today. I would also like to thank the various Government agencies, the DPE and the Commission. I would also like to thank the local communities for their patience and support. It is a very long and thorough process to get to this determination point.

Yours Faithfully



Anthony McClure
Director
Bowdens Silver Pty Ltd