



OUT20/8553

Ms Rose-Anne Hawkeswood
Team Leader
Department of Planning, Industry and Environment
Via Major Planning Projects Portal

Dear Ms Hawkeswood

DPI Agriculture – Response to the Assessment of the Bowdens Silver Project (SSD)

Thank you for the notification of the exhibition of the EIS for the proposed Bowdens Silver Project on 1 June 2020. NSW DPI does not object to the proposed project, however recommends a number of areas where the Agricultural Impact Statement (AIS) should be strengthened in line with the Strategic Regional Land Use Policy Guideline for AISs (Re-issued October 2012) and AIS technical notes: A companion to the AIS guideline (April 2013).

DPI's recommendations are attached and aim to ensure the physical impacts of the mine on agriculture are appropriately considered and mitigated.

In addition, in relation to the socio-economic impacts, DPI considers these are likely to be quite minor but requests that DPIE confirm that claims made regarding sight lines and visual impacts are correct.

Should you have any questions in relation to this response I have asked the Ms Mary Kovac be available to answer your enquiries. Ms Kovac may be contacted on 02 6881 1250

Yours sincerely

 4/8/20

**CHRISTINE TUMNEY
GROUP DIRECTOR, AGRICULTURAL RESOURCES**

DPI Agriculture recommendations - Bowdens Silver Project (SSD No 5765)

Mine Site Recommendations

1. The Rehabilitation Goals (Section 2.16.2, Page 2-86 EIS) should include an objective to support productive and sustainable grazing activities. The aim to achieve pre-existing productivity rates or better should be part of the baseline information contained in the Planning section (Section 2.16.3, Page 2-87, EIS). The current farm management records for Bowdens Farm may provide evidence to inform this baseline.

The information provided in Part 12 Land and Soils Assessment provides a sound baseline dataset that shows pre-mining conditions. The agricultural data presented (such as stock numbers and returns in Part 14 AIS – Section 4.8, Page 14-75) may also help determine the efficacy of the rehabilitation for agricultural purposes.

2. Rehabilitation planning includes land and soil monitoring to report on achievement of pre-mining land and soil capabilities or better. The loss of pre-mining land and soil capability is identified as a medium project risk so soil and land stability monitoring is required to deal with this identified risk issue. The baseline soil information that has been undertaken for this assessment is noted as being included as part of the baseline information for rehabilitation planning. These along with agricultural productivity parameters as noted above can provide a guide to the improvement of soil conditions that are predicted, along with being able to assess overall land and soil capability outcomes at the mine closure.
3. Section 4.1.2 of the AIS Technical notes includes that demonstration of similar land rehabilitation programs from other mining developments be included in the design of the rehabilitation plan. This would present an opportunity to design a grazing rehabilitation plan built on past evidentiary information.
4. Biosecurity broadly covers pests, weeds, diseases and other potential contaminants that can impact on land management and productivity outcomes. Measures to control the suite of biosecurity issues on the mine site can be dealt with in a single management strategy. Biosecurity measures should also be included under the pest and weeds management section that will identify any other disease risks in this area on and adjacent to the mine site e.g. animal health.
5. Whilst both estimated surface water and groundwater impacts are dealt with, the remedial actions should consider a contingency should the impacts on ground or surface water be greater than those modelled. Both ground and surface water are identified as being high and medium agricultural risks in the assessment (Section 1.8 Page 14-33, AIS).
6. The volume of available soil is estimated however an estimate of the amount of soil required for progressive and final rehabilitation and including operational loss must also be calculated. If these calculations indicate a deficit of available soil means of procuring the difference should be determined.

7. The rehabilitation of agricultural productivity should be reflected in the 'Rehabilitation monitoring and maintenance' list (Section 2.16.7) in accordance with the AIS Technical Notes Part 5.12.
8. A commitment is needed to future consultation with landholders in the locality, with specific attention to complaint management around groundwater/surface water changes. Communication strategies should also detail how the surrounding landholders will be informed of any modelled or un-anticipated changes.

Water Supply Pipeline

1. As part of the geotechnical assessment a record of soil stability measurements and observations be included, and any amelioration required noted as baseline information. This will assist with the monitoring of the land stability of the water pipeline and the removal of the pipeline and the final rehabilitation that is required. Ideally soil profile descriptions should be undertaken for each of the soil landscapes and for each position of a soil within a topographic unit of that landscape.
2. As part of the monitoring, consultation with the landholders and photographic evidence of final pipeline construction be undertaken. This will assist with evidence for final land restoration when pipeline removal is undertaken.
3. Any trench that traverses an area of cropping land must be laid to the maximum depth. This will minimise the risk to the pipeline and farm infrastructure if the area is deep ripped etc.