



Rose-anne Hawkswood
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Subject: Bowden Silver Mine Application number SSD-5765

Dear Rose-anne

Thank you for the opportunity provide comments on the Aboriginal cultural heritage assessment (ACH) for the proposed Bowden Silver Mine and associated infrastructure (email Planning Portal request 26/5/2020). Please note that ACH regulation and reviews of ACH major projects have transferred from the Biodiversity and Conservation Division (BCD) of the Department of Planning, Industry and Environment (formerly the Office of Environment and Heritage) and now resides in Heritage NSW of the Department of Premier and Cabinet (Heritage DPC).

Heritage NSW (HNSW) has reviewed the Environmental Impact Assessment (EIS) and associated Appendix (Vol 4 Part 13 ACH assessment). HNSW has not identified significant issues and is satisfied with the adequacy of the ACH assessment in regard to the Secretary's Environmental Assessment Requirements (SEARs). HNSW is particularly satisfied with the Aboriginal consultation and the proposed mitigation actions to be further developed post project approval for the Heritage Management Plan process.

HNSW have only 1 recommendation regarding post approval activities which is listed in Attachment A and detailed comments about the recommendation are provided in Attachment B. If you require any further information regarding this matter, please contact Phil Purcell, Archaeologist, via phil.purcell@environment.nsw.gov.au or (02) 6883 5341.

Yours sincerely

Dr Samantha Higgs
Senior Team Leader – Aboriginal Cultural Heritage Regulation - North
Heritage NSW
Department of Premier and Cabinet

23 July 2020

Attachment A – HNSW's Recommendations

Attachment B – HNSW's Detailed Comments

Heritage NSW recommendation

1. In consultation with the RAPs, undertake an artefact analysis program post project approval and develop skill share opportunities to participate in the analysis for interested members of the RAPs.

Heritage NSW detailed comments

Proposal Name – Bowden Silver Mine EIS

Aboriginal Cultural Heritage

1 Artefact analysis and skill – share opportunities for the RAPs.

The ACH assessment identified a reasonable number of stone artefacts (particularly cores and flakes) that offer research potential of behavioural trends in tool making for the local area. Heritage NSW request that an artefact research program is developed to analyse the stone artefacts particularly those that will be salvaged as a mitigation to reduce harm from the proposed development, post project approval. Heritage NSW note that this is raised in the specialist ACH assessment with community support (Landscape Natural and Cultural Heritage Management 2020 Vol 4 Part 13, 13-84).

The scope of the analysis program must involve as a minimum a comparative analysis with existing information derived from the Ulan/Moolarben/Wilpinjong mine precinct for the purpose of establishing a local and regional character of Aboriginal land use (through stone artefact analysis). We believe this is a reasonable off-set to the cumulative harm to ACH as reported in the ACH assessment (regionally and locally) (2020:13-81).

Heritage NSW request that the stone artefact analysis be developed in partnership with the Aboriginal community whereby, interested parties may wish to participate in the analysis for the purpose of advancing skills in artefact identification, analysis and interpretation or, for developing new skills.

Heritage NSW further recommend that the curation of salvaged artefacts involve a training experience for interested members of the RAPs on the best practice methods of managing heritage objects (stone artefacts).

Recommendations

- 1.1 Develop in partnership with the RAPs an artefact analysis program
- 1.2 Offer opportunities for interested members of the RAPs to participate in the analysis program
- 1.3 Offer opportunities for interested members of the RAPs to develop skills in the appropriate methods for storing and cataloguing stone artefacts.