



Inspired People.  
Dedicated Team.  
Quality Outcomes.

Our Ref: 3983\_R06\_Bowdens Silver Project SIA Review\_V1\_Final

6 December 2022

Rose-Anne Hawkeswood  
Team Leader  
Resource Assessments  
NSW Department of Planning and Environment  
4 Parramatta Square  
Parramatta NSW 2150

E | [rose-anne.hawkeswood@planning.nsw.gov.au](mailto:rose-anne.hawkeswood@planning.nsw.gov.au)

Dear Rose-Anne

**RE: Bowdens Silver Project SIA Review – Umwelt Response**

This letter contains Umwelt's response to the Bowdens Silver Project *Social Impact Assessment Review against the 2017 Social Impact Assessment Guideline for State Significant Mining, Petroleum Production and Extractive Industry Development*, Technical Supplement Appendix D, dated 17 November 2022.

As per **Table 1**, Umwelt has provided itemised responses to the recommendations contained within the SIA Review, for your consideration.

Umwelt (Australia)  
Pty Limited

ABN 18 059 519 041

T| 1300 793 267  
E| [info@umwelt.com.au](mailto:info@umwelt.com.au)

[www.umwelt.com.au](http://www.umwelt.com.au)

**Table 1 SIA Reviewer Recommendations with Umwelt Response**

Item	SIA Section	Recommendation	Umwelt Response
7	Section 3.6 and 3.7	Detail how the views of marginalised groups, such as women, elderly, people with disability and or culturally and linguistically diverse were considered.	<p>As per Section 5 of the SIA, the demographic profile of the community has been understood as:</p> <ul style="list-style-type: none"> <li>• Ageing, with a higher median age than that of NSW, a large proportion of the population falling within the 45–64-year age bracket, with a current high proportion of people in retirement (particularly for the smaller townships nearby the project).</li> <li>• Approximately half the population are women.</li> <li>• A higher proportion of residents identify as Aboriginal or Torres Strait Islander than across NSW.</li> <li>• Equal proportion of people living with a profound disability as across NSW.</li> <li>• Very low cultural and linguistic diversity when compared to the broader NSW population.</li> </ul> <p>Vulnerability in the study communities has been discussed in Section 5.13 and is inclusive of people identifying as Aboriginal or Torres Strait Islander and the elderly or ageing members of the community. Community engagement undertaken for the SIA has been representative of the demographic makeup of the community and has included both female and male participants. For instance, community consultation activities captured the views of a range of stakeholders and community groups in the SIA, including those identified as potentially vulnerable or under-represented, as follows:</p> <ul style="list-style-type: none"> <li>• Section 6.11.1 outlines the gender and age breakdown of respondents to the regional community survey undertaken for the SIA, indicating that more than half of those who undertook the survey were female and over the age of 60 years.</li> <li>• Of those who provided their age, 68% of survey respondents were over the age of 50 years, with 29% aged over 60 years.</li> <li>• 44% of survey respondents identified as female.</li> <li>• Key Aboriginal stakeholders and representative bodies of Traditional Owners were consulted (n=8) via personal interviews, as outlined in Section 6.5.</li> </ul>

Item	SIA Section	Recommendation	Umwelt Response
17	Section 5	Explain data gaps and limitations and how they were addressed.	<p>Data gaps and limitations of the SIA include the following.</p> <ul style="list-style-type: none"> <li>• Despite efforts to engage with a range of stakeholders via multiple methods and attempts to make contact, the SIA team was in some instances unsuccessful in consulting with all members of the local community, as described within Table 3.3 (SIA Engagement Summary) and in Section 3.7.1.1 (the survey respondent profile).</li> <li>• Given the assessment was completed in 2020, census and demographic data contained within the SIA is now outdated, with the 2021 census data now publicly available.</li> </ul> <p>In addition to the above, the SIA was completed in May 2020 and since that time the regional development context of the Project will have changed. Some of the changes that may have influenced the development context for the Project include changes brought by COVID-19 and the regional growth that has occurred, including the establishment of the Central West Orana Renewable Energy Zone, the proposed modifications to existing coal mining operations, the refusal of the Bylong Coal Project and the broader decline in coal mining leading to a need for diversification in employment opportunities. The NSW Government has launched a Critical Minerals and High-Tech Metals Strategy that firmly sets a development agenda for mineral Projects that may support the growing and expected demand for minerals for use in a variety of burgeoning industries such as solar panel manufacture. Silver and zinc are important parts of this strategy.</p>
19	Section 7	Assess impacts related to mine closure.	<p>It should be noted that Bowdens Silver considers there is considerable potential for future development of minerals mining in the locality including an underground mine directly beneath the currently proposed open cut pit. A Scoping Study has commenced for this potential further development. In addition, the company continues with an exploration program that has the potential to expand the mine's operational life. Regardless of these future opportunities, potential social impacts under a mine closure scenario may relate to:</p> <ul style="list-style-type: none"> <li>• Potential loss of employment and business contracts with the mine operation.</li> <li>• Potential outgoing population from closest towns, due to mine workers and their families moving elsewhere. This could occur rapidly if the mine workforce is not transitioned or reduced gradually.</li> <li>• Population decreases due to the closure of the mine may result in changes to the composition of the community, for example, potentially decreasing the proportion of households comprised of couples with children in closest towns. It could also result in changes to the proportion of the population</li> </ul>

Item	SIA Section	Recommendation	Umwelt Response
			<p>engaged in the labour force and may reduce local economic diversification resulting in a drop-in commercial activity causing flow on effects for small businesses and contractors along the mine supply chain.</p> <ul style="list-style-type: none"> <li>• Closure may also alter levels of community cohesion and access to community services, facilities and infrastructure due to a reduction in the local population, which may result in some services reducing capabilities and/or funding capacity.</li> </ul> <p>The conditions of the mining lease for the Mine would require the Company to prepare a Rehabilitation Management Plan and to report on progressive rehabilitation each year. The plan would need to be prepared taking into account the input from government, industry and community stakeholders. Social closure criteria may be established in this document to manage and mitigate social impacts and to facilitate an effective transition process.</p>
21	Section 7	Provide an assessment of potential risk to human life (employees and communities) in a TSF failure scenario.	<p>Section 6.5.7 of the SIA outlines community sentiment as it relates to the risk of TSF failure. Section 7.3.1.1 also identifies impacts to human health that may be caused by pollutants in the water supply due to a TSF failure scenario. Concerns regarding the TSF were raised in consultation and in submissions received by the DPE. The use of tailings storage facilities is common practice in metalliferous mining across Australia and globally. The few cases of failure are the exception for this practice and not consistent with the many successful facilities that are designed, constructed, used, and rehabilitated for mining purposes.</p> <p>The Tailings Storage Facility - Preliminary Design prepared by ATC Williams describes the consequence category for the TSF as High-C based on Dam Safety NSW and ANCOLD guidelines which includes consideration of population at risk (risk to human life), property damage and environmental harm along the flow path of any dam failure. It is recognised that any TSF failure may have a range of other environmental or social impacts which relate to human health, land uses and cultural values.</p> <p>Bowdens Silver has committed to implementing a program of TSF monitoring and management for the construction period and for the life of mine. This will include monitoring the structural stability of the TSF embankment as well as water quality outcomes.</p>

Item	SIA Section	Recommendation	Umwelt Response
			<p>Dams Safety NSW regulate declared dams (such as the TSF) in accordance with the Dams Safety Act 2015 and the Dams Safety Regulation 2019. Dam owners are required to undertake the following reporting on the dams.</p> <ul style="list-style-type: none"> <li>• Annual Dams Safety Standards Report.</li> <li>• Annual review of the Dam Safety Management System.</li> <li>• Annual review of an Operations and Maintenance Plan.</li> <li>• Full review and update of contact details within an Emergency Plan every five years.</li> <li>• Review of the Operations and Maintenance Plan.</li> <li>• A Risk Report (including an assessment of societal and individual risk rating) every five years.</li> <li>• Every 15 years undertake a review of the Consequence Category Assessment and complete a Safety Review.</li> </ul> <p>An Emergency Plan would be prepared and implemented ahead of earthworks and embankment construction. Guidelines on the preparation of these plans are provided by Dams Safety NSW<sup>1</sup>. This plan would include measures for ongoing engagement with the community to ensure that the plan is transparently shared with the community and other stakeholders to generate awareness of its contents, evacuation procedures, response triggers, and responsibilities and to ensure that both employees and communities are informed, equipped, and empowered to act safely in the event of a TSF failure event (covering the range of possible scenarios).</p> <p><sup>1</sup> <a href="https://www.damsafety.nsw.gov.au/publications/guideline-emergency-plans">https://www.damsafety.nsw.gov.au/publications/guideline-emergency-plans</a></p>
23	Section 7	Assess the cumulative impacts to: Aboriginal cultural heritage, water access and use, and housing and services.	Regarding the cumulative impacts on Aboriginal cultural heritage, the assessment of significance prepared in the Aboriginal Cultural Heritage Assessment (Landskape2020) has indicated that the artefacts and areas recorded during the assessment are generally of low cultural significance, however Bowdens Silver recognises the high cultural significance for the Aboriginal community of any disturbance of land. It is acknowledged that development in the region may be limiting access to locations of cultural heritage significance and that physical disturbance of land has the potential to diminish the archaeological record or cultural value of the landscape.

Item	SIA Section	Recommendation	Umwelt Response
			<p>Bowdens Silver has proposed an Indigenous Technical Heritage Mentorship Program that would partner a Project archaeologist and an elder in the community with one or two Aboriginal youths with an interest in learning the process of Aboriginal object recording, collection, analysis and curation. This program would provide the opportunity for younger members of the local Aboriginal community to directly learn about the cultural value of the area and also become involved and gain training in archaeological practices.</p> <p>Relating to cumulative social impacts regarding water access and use, Section 7.1.1 in the SIA discusses these impacts and the associated mitigations measures as they relate to the area being drought prone. Water security has been raised as a past and current community issue. It is noted that Bowdens Silver has endeavoured to limit downstream water-related impacts, would not actively take water from surface water sources shared with the community, and has ensured that sufficient water access licenses are held for the projected water requirements of the Project. The currently proposed reliance on on-site water sources has been developed and to achieve a key objective which is to limit potential impacts to other local water users which are predicted to be negligible based on the results of the Surface Water Assessment.</p> <p>Considering the changing regional development context since the SIA was prepared, the assessed social impacts of the Project may be heightened when considering the cumulative effect of multiple major projects in the region entering construction or operations concurrently with the Project. Cumulative social impacts due to multiple concurrent development projects would be largely associated with access to accommodation and housing and social infrastructure and services. It is discussed within the SIA that at the time of reporting, housing provision in nearby towns was limited, and the short-stay accommodation market across the LGA was servicing multiple other operational mines and sectors, such as tourism. Bowdens Silver has indicated its preference for employees to live locally and has consulted with Mid-Western Regional Council on numerous occasions on these matters.</p> <p>In order to mitigate any possible impacts on social infrastructure associated with the Project, Bowdens Silver would plan for the necessary housing and services through a detailed Workforce Strategy that would be a working document managed by the Company and would be summarised in a dedicated sub-section of the Social Impact Management Plan, particularly targeted to the provision of accommodation for the construction workforce.</p>

Item	SIA Section	Recommendation	Umwelt Response
24	Section 7	<p>Explain if women and the elderly are likely to experience impacts to a greater degree, including access to services, employment, amenity changes, changes to sense of community, safety and limited access to engagement and decision making.</p> <p>In addition, discuss how noise could impact school users.</p>	<p>It is acknowledged that women and girls within host communities are commonly affected by adverse social impacts of projects disproportionately due to existing gendered roles, norms, and structures within a community. Further, elderly members of communities can also experience different effects of social change and/or development, due to often existing difficulty in accessing local infrastructure and services and more limited use of technology.</p> <p>Bowdens Silver and its parent company Silver Mines Limited has implemented a Diversity Policy in line with Corporate Governance guidelines. The policy affirms existing employment arrangements which seek to attract and retain people by promoting an environment where employees are treated with fairness and respect and have equal access to opportunities as they arise. Diversity within the workforce includes such factors as religion, race, ethnicity, language, gender, disability and age. Bowdens Silver believes that the adoption of an efficient diversity policy has the effect of broadening the employee recruitment pool, supporting employee retention, including different perspectives and is socially and economically responsible governance practice.</p> <p>The ABS census (2016 and 2021) indicates the following differences between men and women in the community:</p> <ul style="list-style-type: none"> <li>• women are more likely to be qualified at the bachelor or postgraduate degree level when compared to men whose educational attainment is largely at the certificate level</li> <li>• more women than men in the study community are employed part time</li> <li>• a higher proportion of women are not engaged in the labour force than their male counterparts</li> <li>• higher proportions of women than men are engaged in unpaid domestic work, and women are involved in significantly higher quantities of hours of unpaid domestic work than men</li> <li>• men are much more likely to be employed in mining, construction, agriculture, and manufacturing than women, whereas sectors that women are predominantly employed in are education and training, healthcare and social assistance, administrative and support services, and professional, scientific and technical services.</li> </ul> <p>While a gendered assessment of the social baseline profile has not been undertaken as part of the SIA, the following inferences can be made about the effect of the project on women based on the data outlined above:</p>

Item	SIA Section	Recommendation	Umwelt Response
			<ul style="list-style-type: none"> <li>As women are more likely to be at home in unpaid domestic work or care roles, they may experience the adverse effects of social amenity impacts (impacts of noise, vibration, and dust) as a result of the project more so than men who more commonly work away from their homes.</li> <li>The most prevalent sectors of employment by gender indicates that the mine workforce would have a larger portion of men than women. This could result in unintended gendered experiences in the workplace that may fall more heavily on female employees, including sexual harassment, wage discrepancies, imbalance in paid time off work for periods of parental leave, and barriers in accessing career growth opportunities or in recruitment processes.</li> <li>In public, women may experience adverse effects of a predominately male workforce, particularly where workers are transient (i.e., construction workforces). This could potentially exacerbate matters relating to public safety due to an increase in anti-social behaviour e.g., harassment, as well as an increase in sexually transmitted diseases and a rise in the sex industry in local towns.</li> </ul> <p>Further, the elderly may experience difficulty participating in Project decision-making due to a more limited usage of technology and the internet, with more preferred means of exchanging information and communication being reliant on informal social structures and networks.</p> <p>It is for these reasons that the SIA has included a range of engagement mechanisms, including consultation over the telephone (personal interviews and surveys) and in-person community events held at local venues. These mechanisms were targeted at reaching minority or marginalised groups.</p> <p>The elderly may also have further difficulty in accessing services and infrastructure should the local population increase due to the incoming project workforce, and heightened demand for such services that may be already under-supplied, for example health care. For instance, it is understood that the Mid Western Regional LGA currently has difficulty in securing and maintaining GPs resulting in services available being insufficient to meet the current demand, yet other health care services are currently/recently being improved, such as the re-development of the Mudgee Hospital – refer to Section 5.8.3 and Section 7.2.2 in the SIA. Additionally, more elderly or aged members of the community are more likely to spend time, or longer periods of time as compared to others, at home, therefore it is possible that for those proximal residents to the proposed mine site, they may experience the effects of construction or mine-generated noise, vibration, traffic and/or dust to a greater extent.</p>



Item	SIA Section	Recommendation	Umwelt Response
			<p>The SIA involved consultation with the Principal of the Lue Public School and students. Bowdens Silver has also established and maintained a long-term positive relationship with the school.</p> <p>While the Noise and Vibration Assessment identifies the Lue Public School as a sensitive location, it is considered unlikely that noise-related impacts at the school would be experienced to the extent that the mining operations would be intrusive or that loud noises (such as blasting) would startle children while learning. Bowdens Silver would establish a long-term noise, ground vibration and airblast overpressure monitoring location within Lue. Continuous noise monitoring would also be established to ensure that records of mine-related noise are being collected and are available to Bowdens Silver personnel to respond to any non-compliance issues. A program of monitoring would also be undertaken at a number of other locations within Lue, such as at the Lue Public School, to enable a range of short-term noise and vibration measurements to be collected to fully understand the relationship between the monitoring results at the long-term monitoring location and a number of other locations around Lue. This information would be collected irrespective of whether any concern is raised.</p> <p>The SIA has discussed the positive impacts that would likely be experienced by the existing users and community of Lue Public School as well as other local schools due to the incoming mine workforce population supporting potential growth in the schools and their capacity, and subsequent flow on effects to the diversification of the local community.</p>
25	Section 7	<p>Consideration of further management measures in response to the following impacts with Extreme and High residual risks is recommended:</p> <ul style="list-style-type: none"> <li>— <b>Construction Social amenity – noise to 5 residences.</b> Suggestions from the community included: double glazing windows and consideration of limiting high noise activities during the day and avoid identified dates.</li> </ul>	<p>The Noise and Vibration Assessment identified five private residences at which exceedance of the relevant noise criteria was predicted to occur during the site establishment and construction stage. Since that time, the owners of three of these residences have reached agreements with Bowdens Silver (of which are considered to be Project-related for the purpose of assessment). Bowdens Silver has offered the remaining impacted landowners as well as other landowners that were predicted to experience negligible impacts the opportunity for a builder and acoustic technician to visit their properties following an approval of the Project to discuss what mitigations may be available for their particular circumstances.</p> <p>Further, a Construction Noise Management Plan will be developed which will include a requirement to engage with key stakeholders that may be affected by construction activities (e.g. proximal residents and those residing along the main access route) to ensure awareness of construction activities and the measures in place to reduce impacts on local residents and community members.</p>

Item	SIA Section	Recommendation	Umwelt Response
		<p>Providing information to residents about high noise activities could also support their preparedness.</p>	
		<p><b>Social amenity – traffic volume and disruption LGA Road Users.</b> It is not adequately explained when the design and construction of a new road to access the Mine Site from the west of Lue removing most mine-related traffic that would otherwise pass-through Lue and the school. It is recommended this measure is implemented prior to construction.</p>	<p>The Project’s Construction Noise Management Plan will address possible social amenity impacts on road users and would be developed prior to construction.</p> <p>The relocated Maloneys Road (which would be moved to the west of Lue), that has been proposed to reduce traffic impacts within Lue and passing the Lue Public School, would be completed within the first 6 months of construction, effectively removing the majority of mine-related traffic that would have to pass through Lue. A range of earthworks are planned to occur at the Mine Site during the construction of the relocated road, however the majority of construction works would not commence until the road was constructed.</p>
		<p><b>Population change – impact of Construction and Operational workers and families on housing and accommodation.</b> It is recommended that a Housing and Accommodation Strategy is developed for this project.</p>	<p>Noted, while detailed analysis on the housing market and its capacity has been provided within the SIA in Section 7.2.1, it is agreed that a Workforce Strategy would be developed and summarised in a dedicated sub-section of the Social Impact Management Plan.</p>
		<p><b>Population change – impact of Operational workers and families on Childcare Service.</b> No specific measures are proposed to manage this impact. It can be presumed that the Planning Agreement (PA) with the Mid-Western Regional Council could address constraints to Childcare. Given the uncertainty of the content</p>	<p>The SIA has outlined the impacts of population change that may result due to the influx of the construction and operational workforces associated with the project in Section 7.1 of the SIA and the potential impacts on service capacity and delivery have been noted in Section 7.2. Section 7.2.3 of the SIA specifically states the following in relation to childcare services.</p> <p><i>“.....there is some capacity for existing childcare centres in the Mid-Western Regional LGA to absorb a population influx in the specified cohort, particularly given the development of two new centres recently within the LGA. However, capacity appears to be somewhat constrained and the perceived stakeholder concern around childcare provision is high.”</i></p>

Item	SIA Section	Recommendation	Umwelt Response
		<p>of the PA, it is recommended that specific measures are identified.</p>	<p>It would be important for Bowdens Silver to attract and retain employees living in the local area. The Workforce Strategy would include aspects of workforce management that require monitoring and possible company involvement.</p> <p>The Planning Agreement for the Project includes provision for contributions provided by the Company to be put towards community infrastructure needs which may include childcare or other services and programs.</p>
		<p><b>Social amenity – noise // Operations for properties in acquisition zone.</b> It is recommended that additional management measures are proposed by the project proponent. Specially for those residents within acquisition zone and in management zone.</p>	<p>A number of project mitigation strategies have been proposed to minimise impacts on social and visual amenity as a result of the proposed Project (refer to Section 8.1 of the SIA).</p> <p>It is important to note, that since the SIA was completed, there are now no longer any private residences within the “acquisition zone”. Two private properties remain within the management zone and the owners of these properties have been consulted on possible mitigations at their respective properties. Although agreement has not yet been reached, Bowdens Silver has indicated that it is open to discussion on these matters.</p>
		<p><b>Social amenity – noise // Operations for residents in management zone.</b> Consideration of additional measures for the school is recommended to adopt a precautionary approach.</p>	<p>Continuous noise monitoring would be established for the Project with the intention that triggers for adaptive management can be provided to mine management as noise levels are increasing or should they exceed the relevant criteria. This would enable the swiftest path to re-establish compliance or proactively altering operations to limit possible impacts.</p>
		<p><b>Visual amenity due to: Change to landscape Light spill (at night) Locality residents where Project would be visible (n=6).</b> It is recommended that additional management measures are proposed by the project proponent for residents where Project would be visible (n=6).</p>	<p>As noted above, a number of project mitigation strategies have been proposed to minimise visual impacts associated with light. All lighting would be designed to satisfy the Australian Standard, AS/NZS4282:2019 Control of the obtrusive effects of outdoor lighting and the Sidings Springs Observatory Dark Sky Planning Guidelines as described in the Lighting and Sky Glow Assessment prepared by Lighting, Art &amp; Science Pty Limited.</p>

Item	SIA Section	Recommendation	Umwelt Response
		<p><b>Sense of community – Cohesion, character, sense of place, rural lifestyle Locality residents.</b> It is recommended that specific measures to address changes to cohesion, character and sense of place are identified and proposed. The SIA’s approach to addressing these impacts cannot rely solely on a community investment program, which should be aimed at enhancing benefits to the local community rather than mitigating negative effects.</p>	<p>Ongoing engagement with the community during site establishment and construction and over the life of the Mine would be essential to establish the necessary mechanisms for feedback and adaptive management of adverse social impacts. Bowdens Silver has become an established member of the local community with relationships between the local community and Bowdens Silver personnel enabling the process of feedback and input to occur. However, there are members of the community that oppose the proposed Mine and have chosen not to be involved with engagement activities. These community members would need to be the focus of ongoing engagement subject to approval and subsequent commencement of the Project.</p> <p>Potential impacts to community sense of place and community character would also be mitigated and managed through the targeted support provided by the Project to preserve sites or places of community value in consultation with local stakeholders and members of the community and to ensure that such support is in line with local expectations, aspirations, needs and priorities.</p> <p>To manage impacts on levels of community cohesion caused by the construction and operational workforce, the Project would develop a Workforce Strategy which may include:</p> <ul style="list-style-type: none"> <li>• A Workforce Code of Conduct with contractual obligations and repercussions in the incident of a breach.</li> <li>• Opportunities for the workforce to participate in local community activities/events/volunteer initiatives.</li> <li>• Policies and procedures communicated to the public to address workforce related behavioural complaints or grievances by the community.</li> </ul> <p>Coordination and consultation with local stakeholders to support the monitoring and management of workforce behaviour in local communities such as with police, community organisations/groups/services, hospitality venues and/or local government.</p>
		<p>— <b>Impact on Water quality as a result of TSF failure (moderate).</b> It is recommended the proponents adopts GISTM standards. Specially:</p>	<p>As previously noted, Section 6.5.7 of the SIA outlines community sentiment as it relates to the risk of TSF failure. Section 7.3.1.1 also identifies impacts to human health that may be caused by pollutants in the water supply due to a TSF failure scenario, with potential social impacts noted.</p> <p>Bowdens Silver accepts the recommendation to use Global Industry Standards on Tailings Management (GISTM) to inform the development of an Emergency Plan provided that the guidelines are consistent</p>

Item	SIA Section	Recommendation	Umwelt Response
		<ul style="list-style-type: none"> <li>assessing TSF risk category in case of failure as per GISTM</li> <li>identifying who is likely to be affected in case of TSF failure (including employees and community members)</li> <li>developing and implementing a communication plan for those likely to be affected in case of failure (if needed)</li> </ul> <p>development an emergency response management plan in case of failure and a communication and engagement plan for failure.</p>	<p>with the prescribed requirements of Dams Safety NSW (<a href="https://www.damsafety.nsw.gov.au/publications/guideline-emergency-plans">https://www.damsafety.nsw.gov.au/publications/guideline-emergency-plans</a>).</p> <p>In its preamble, the GISTM states that <i>"Conformance with the Standard does not displace the requirements of any specific national, state or local governmental statutes, laws, regulations, ordinances, or other government directives. Operators are expected to conform with the Requirements of the Standard not in conflict with other provisions of law."</i></p> <p>As the owner of a declared dam (the TSF), Bowdens Silver will be required to comply with its legally enforceable obligations under the NSW <i>Dam Safety Act 2015</i> and the NSW <i>Dam Safety Regulation 2019</i> (the Regulation). These obligations will be guided by the specific requirements of Dam Safety NSW, the regulatory agency responsible for overseeing the management of declared dams in NSW. This agency, comprising (amongst others) experts in dam engineering and emergency management oversees the implementation of these obligations include those relating to the design and management of the TSF, including the preparation of emergency management plans.</p> <p>In particular, the following requirements align with the various principles of the GISTM, namely</p> <ul style="list-style-type: none"> <li>The TSF consequence category must be assessed in accordance with methodology required by the Dams Safety Act 2015. Similar to the GISTM, this methodology considers population at risk (i.e loss of life), environmental harm, property and economic loss as well as social and health impacts when determining the consequence category that then establishes the relevant dam design criteria; and</li> <li>Clause 10 of the Regulation, which aligns with Principle 13 of the GISTM, that requires the preparation of an emergency management plan. Under the Regulation, this plan <b>must</b> be prepared in consultation with Dam Safety NSW and the NSW State Emergency Service.</li> </ul> <p>The above points have been drawn from a comparison of Dams Safety NSW requirements and those of the GISTM that can be viewed via the link below:</p> <p><a href="https://www.damsafety.nsw.gov.au/publications/dams-safety-facts-global-industry-standard-on-tailings-management-versus-nsw-dams-safety-legislation">https://www.damsafety.nsw.gov.au/publications/dams-safety-facts-global-industry-standard-on-tailings-management-versus-nsw-dams-safety-legislation</a></p> <p>Bowdens Silver also accepts that, from time to time, Dam Safety NSW may alter the prescribed requirements of a dam owner to satisfy its obligations, including updates developed in response to global initiatives.</p>

Item	SIA Section	Recommendation	Umwelt Response
		<p>— <b>Community engagement and information provision – Locality residents (moderate).</b></p> <p>It is recommended that:</p> <ul style="list-style-type: none"> <li>• A grievance mechanism is established prior to construction, detailing how grievances will be investigated, resolved in case of non-conformity, and scaled to senior management. The grievance mechanism should take the form of a procedure rather than a component of a Good Neighbour Program and should be made known internally across the organization.</li> <li>• Given the scope of the SIMP, the number of activities to be implemented by the Good Neighbour Program and the Community Investment Program relying on one single staff member is deemed insufficient. Community engagement and social development are two distinct disciplines that require qualified professionals to ensure implementation is effective.</li> </ul>	<p>It is noted that the Project already has a community contact number and “Open Door policy” should a member of the public seek to communicate with the Project or submit a complaint.</p> <p>Bowdens Silver has committed to establishing complaints protocols and it is noted that these are standard requirements for State Significant Development and also for operations regulated under an Environment Protection Licence. Complaints protocols would be publicly distributed with contact details available on the Company website.</p> <p>The Project currently employs a Community Liaison Officer to meet the resourcing needs of the Project at present. As Project development proceeds, resourcing requirements would be reviewed to ensure the effective delivery of the Company’s commitments.</p>

Item	SIA Section	Recommendation	Umwelt Response
		The responsibility of the monitoring and evaluation should be on hands of a social performance leader or manager.	
27	Section 7	Explain the acceptability of Extreme and High residual risks.	<p>The SIA identifies that a range of Project design changes have been implemented to remove or reduce social impacts. These have included substantial changes to Project design compared to previously proposed iterations and adding Project components such as the commitment to relocate Maloneys Road. In addition, a range of management, mitigation and enhancement strategies have also been proposed in order to minimise the potential negative social impacts and enhance the positive benefits.</p> <p>It is identified that some residents may, for example, experience a loss associated with their sense of place or expectations of the future. However, others, both locally and within the broader LGA, may benefit from improved opportunities available through the proposed community investment and distribution of benefits.</p> <p>The concluding statement of the SIA addresses the acceptability of residual risks through the commitment to implementation of proposed mitigation and management strategies as follows.</p> <p><i>A number of mitigation and enhancement strategies are proposed to address potential social impacts, relating to the Bowdens Silver Project including:</i></p> <ul style="list-style-type: none"> <li>• <i>Development of a dedicated Lue and Regional Community Investment Program that focuses on enhancement initiatives for Lue and other key communities in the LGA</i></li> <li>• <i>Local employment and procurement strategy</i></li> <li>• <i>Good neighbour program</i></li> <li>• <i>Property specific measures</i></li> <li>• <i>Implementation of a Planning Agreement with the Mid-Western Regional Council</i></li> <li>• <i>Implementation of environmental management plans</i></li> <li>• <i>Development and implementation of a SIMP for the ongoing monitoring and management of social impacts, with community engagement informing its development.</i></li> </ul>

Item	SIA Section	Recommendation	Umwelt Response
			<p><i>These mitigation and enhancement measures have been identified to, where possible, address the social impacts identified and are based on stakeholder engagement and feedback.</i></p> <p>Bowdens Silver would continue meaningful engagement throughout the Project life and monitor the social impacts and outcomes of the Project and the implementation of the various strategies. This would provide for adaptive management and refinement of enhancement initiatives. In addition to information that would be provided through the Good Neighbour Program, the outcomes of the engagement and monitoring would be reported annually through publicly available reporting in order to keep the community informed, maintain transparency, and to remain accountable to the community.</p>



We trust this information meets with your current requirements. Please do not hesitate to contact the undersigned on 1300 793 267 should you require clarification or further information.

Yours sincerely

A handwritten signature in blue ink that reads 'A. J. Coakes'.

**Dr Sheridan Coakes**

Practice Lead, Social Assessment & Community Engagement

E | [scoakes@umwelt.com.au](mailto:scoakes@umwelt.com.au)

M | 0412 510 529