



WELLINGTON VALLEY WIRADJURI
ABORIGINAL CORPORATION

P.O. Box 1583
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WVWAC@hotmail.com

12 August 2021

Department of Planning

**RE: Bowdens Silver Pty Limited Amendment Report - State Significant Development
No. 5765**

To Whom it may concern,

Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC) would like to thank you for your invitation to provide a response for This Aboriginal Cultural Heritage issue relevant to obligations to protect our Heritage within our Traditional Lands. Wellington Valley Wiradjuri represent the fourteen traditional families with identified apical ancestry pre European occupation with our known Traditional Lands. We know our culture, country and continue with our association with our traditional lands (Ngurangbang).

WVWAC notes that the Corporation CEO is a member of the Bowdens Silver Community Consultation Committee (CCC), and has actively updated community and other Aboriginal Registered Parties, Individuals and groups around the developments and changes of this project.

Wellington Valley Wiradjuri Aboriginal Corporation is generally supportive of any efforts to provide facilities and business for the community at large within our Traditional Lands, provided Proponents have consulted with WVWAC and negotiated an agreed outcome in relation to our cultural, heritage and environmental concerns. In terms of this project WVWAC **Strongly Object** to this development being passed.

Wellington Valley Wiradjuri Aboriginal Corporation (WVWAC) have through consultation with other Traditional Elders and Traditional Community with cultural knowledge have the following comments and or recommendations in relation to the Bowdens Silver Amendment Report:

- Aboriginal Community are of the general opinion that Bowdens Silver has not adhered to the consultation guidelines. The Process that has occurred on every other project except this one since 2010 is as follows:
 - Draft Survey Methodology sent out for Comment with a 28 day period for submissions – This has occurred on a few occasions,
 - Registered Aboriginal Parties hold meetings to discuss and make a formal submission on the Draft Methodology – **This has occurred on a few occasions,**

- Field Survey Conducted,
 - Within 3-4 months post survey a Draft Report Issued to Registered Aboriginal Parties with a 28 day period for submissions – **This has never occurred.**
 - Registered Aboriginal Parties hold meetings to discuss and make a formal submission on the Draft Survey Report – **This has never occurred as never received a report.**
 - Registered Aboriginal Parties feedback added to report and finalised – **This has never occurred as RAP's have never received a report.**
 - Final Survey Report supplied to Registered Aboriginal Parties. – **This has never occurred.**
 - Final Survey Reports are gathered and forms the basis of the Cultural Heritage Section of and EIS.
 - Draft Heritage Section of EIS sent out for Comment with a 28 day period for submissions -**This has occurred and was first report ever given to community since at least 2013 if not prior.**
- For each area that the Cultural Heritage Surveys were conducted for Bowdens Silver, the archaeologist Dr. Matt Cupper has not provided a Draft Survey Report for community to comment on and feed into the final report.
 - There is no information within this section of the EIS or Amendment Report in regards to the long term effects on sensitive landform structures such as escarpment based cultural rock shelters or others within a short distance that are boulder rock shelters. Some of these cultural sites contain sensitive rock art.
 - Rock Shelter with Hand stencils – not located throughout a survey, **this site must be found, There must be no impacts to this site at all.**
 - **Aboriginal Community have not agreed to any of the recommendations or conclusions drawn by this Amendment Report**, as we have not been directly consulted prior to this report to make comment or recommendations as to what should occur at each site or if landforms require any sub-surface testing or salvage.
 - It is noted that several Registered Aboriginal Party Field Officers who participated in Cultural Heritage Surveys onsite have since died, it is unknown if the current Directors or other Field Officers of those affected RAP's are aware of various survey details in which their members participated.
 - Changes to the visual landscape will adversely affect Traditional Pathways (Song lines/Travelling Lines) as our environment and the landscape is our roadmap, These Song lines are intangible Cultural Heritage fixed to the Tangible landscape, the more we lose the less connection our People have to the land.
 - Aboriginal Community put a higher cultural and Anthropological value on our cultural heritage and artefact sites which is in stark opposition to the scientific value which is recorded as Low for the majority of artefact sites in the EIS and Amendment Report.



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- This is our heritage, our ancestral links and projects such as this keep destroying them and we have less and less physical traditional sites and it is a significant loss to our heritage with the damage to or collection at each AHIMS registered site. Anthropologically these sites tell our ancestor's story across the landscape and the loss of physical sites and the linked landscape to show future generations is becoming dangerously high within this Traditional Clan area.
- We have concerns over land clearing for the proposed powerline easement and what this will mean in regards to native flora and fauna not to mention the negative visual impact this will have on the area.

Wellington Valley Wiradjuri Aboriginal Corporation **Strongly Object** to this Silver Mine Development, as there are issues relating to outcomes in relation to our Traditional Owner Community cultural, heritage and environmental concerns that need to be satisfied along with various other factors as detailed in the information above.

WVWAC look forward to further participating in the above project, sharing our knowledge of country and to ensure our Heritage is protected. We trust our response meets your requirements. Please contact WVWAC Directors should you require our assistance to address any Aboriginal issues to support your future plans.

Regards,

Bradley R. Bliss J.P.
WVWAC CEO and Contact Officer
Gallangabang Aboriginal Corporation Director
Senior Aboriginal Cultural Heritage Field Officer
Senior Aboriginal Cultural Mentor and Educator
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