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Mr Andrew Scott
Environment Assessments
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Our Ref: DLPE2026/0048

Dear Mr Scott

**Re: Invitation to comment - Supplementary Environmental Report - Groote Eylandt Mining
Company Pty Ltd - GEMCO Excess Water Disposal Project**

The information submitted for the above Supplementary Environmental Report (SER) has been assessed by the relevant divisions within the department and the following comments are provided:

Flora and Fauna Division

The Flora and Fauna Division considers that risks to marine ecosystems from the Project are low due to the discharge plume being naturally buoyant and vertically constrained to surface waters. Updated modelling confirms no zones of moderate or high impact relating to suspended sediments, and localised sedimentation below conservative ecological thresholds for sensitive benthic habitats. Additionally, benthic habitats within the Project footprint are primarily of low ecological value relative to the broader region, consisting of predominantly opportunistic species with greater recovery potential. The SER outlines adequate monitoring and adaptive management strategies to manage cumulative stressors.

The Flora and Fauna Division considers that risks to terrestrial ecosystems from the Project to be low due to the positioning of infrastructure within a predominantly disturbed area and the small amount of clearing required. The SER satisfactorily addresses recommendations made by the Flora and Fauna Division regarding terrestrial ecosystems.

Further comments from the Flora and Fauna Division are provided in **Attachment 1**.

Mining Division

The Mining Division has reviewed the SER and provides comments in **Attachment 2**.

Environment and Heritage Division

Heritage Branch

The Heritage Branch has reviewed the SER and provides comment in **Attachment 3**.

Land Resources Division

Vegetation Assessment Unit

The applicant advises that all land clearing will occur on land covered by an environmental (mining) licence (under the *Environment Protection Act 2019* (EP Act)) and therefore a development permit under *the Planning Act 1999* for the clearing of native vegetation is not required.

Land Management Unit

The previous advice provided by the Land Management Unit remains the same.

Weed Management Branch

The previous advice provided by the Weed Management Branch remains valid.

Lands and Planning Division

Development Assessment Services

Development Assessment Services has reviewed the SER and confirms that the previous comments provided remain valid.

Crown Land Estate

Crown Land Estate has reviewed the SER and advises their previous comment remains valid.

Water Resources Division

The Water Resources Division have reviewed the SER and confirms the previous comments provided remain the same.

Should you have any further queries regarding these comments, please contact the Development Coordination Branch by email DevelopmentAssessment.DLPE@nt.gov.au or phone (08) 8999 4446.

Yours sincerely



Alaric Fisher
Executive Director Flora and Fauna

Attachment 1 – Flora and Fauna Division comment

Attachment 2 – Mining Division comment

Attachment 3 – Heritage Branch comment

Attachment 1

Submission on Supplementary Environmental Report

Groote Eylandt Mining Company Pty Ltd (GEMCO) – Excess Water Disposal Project

This submission is made under regulation 123 of the Environment Protection Regulations 2020

NT EPA reference number: EP2025/043

Government authority: Department of Lands, Planning and Environment – Flora and Fauna Division

Summary:

- The Flora and Fauna Division considers that risks to marine ecosystems from the Project are low due to the discharge plume being naturally buoyant and vertically constrained to surface waters. Updated modelling confirms no zones of moderate or high impact relating to suspended sediments, and localised sedimentation below conservative ecological thresholds for sensitive benthic habitats. Additionally, benthic habitats within the Project footprint are primarily of low ecological value relative to the broader region, consisting of predominantly opportunistic species with greater recovery potential. The SER outlines adequate monitoring and adaptive management strategies to manage cumulative stressors.
- The Flora and Fauna Division considers that risks to terrestrial ecosystems from the Project remain low due to the positioning of infrastructure within a predominantly disturbed area and the small amount of clearing required. The SER satisfactorily addresses recommendations made by the Flora and Fauna Division regarding terrestrial ecosystems.

Section of SER	Theme / issue	Comment
5. Responses to submissions	Terrestrial ecosystems Groundwater dependent ecosystems	The Flora and Fauna Division's submission on the referral considered that significant impacts on groundwater dependent ecosystems (GDEs) from the Project were unlikely, but recommended that groundwater monitoring be expanded to provide a more robust dataset, provide confidence that impacts to groundwater are within acceptable levels, and enable management measures to be implemented promptly should a negative trend be detected. The SER response to submissions includes additional information about the groundwater bore network. The Flora and Fauna Division notes that part of the dewatering monitoring bore network is not currently operational and that some bores are to be re-commissioned. The Flora and Fauna Division also notes that the proponent plans to expand the monitoring network. Details of which

Section of SER	Theme / issue	Comment
		boreholes are not operational, those that are to be re-commissioned or how the monitoring network will be expanded has not been included in the SER. Such details will be important to include with any updated Mining Management Plan (MMP) and/or waste discharge licence (WDL) application. The Flora and Fauna Division reiterates that significant impacts to GDEs from the Project remain unlikely, but that an expansion of the groundwater monitoring network will provide a more robust dataset to inform water management decisions.
5. Responses to submissions 8.1 Land: Terrestrial ecosystems Appendix D – Mitigation and management measures	Terrestrial ecosystems Flora Sensitive and/or significant vegetation	The SER identifies that a minor realignment of the pipeline route and an increase in clearing of 6.18ha is required for construction and asset protection purposes. The Flora and Fauna Division considers that, given the amount of clearing required remains relatively small and the proposed location of the pipeline remains in proximity to predominantly modified areas adjacent to the Rowell Highway, the overall risk to sensitive and/or significant vegetation remains low. The Flora and Fauna Division reiterates that the mitigation measures outlined by the proponent that vegetation clearing “will be no wider than is necessary to facilitate the construction of the pipeline and the associated infrastructure” (Appendix D, Table D.3) is appropriate.
5. Responses to submissions Appendix D – Mitigation and management measures	Terrestrial ecosystems Fauna Threatened species habitat	The Flora and Fauna Division submission on the referral considered that the management and mitigation measures proposed were appropriate and that the risk to terrestrial threatened fauna species was low. Despite the low risk, the Flora and Fauna Division recommended that the Construction Environmental Management Plan (CEMP) specify that trees with hollows are avoided where possible. The SER includes a commitment that the CEMP will specify that trees with hollows will be avoided where possible. The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation.
5. Responses to submissions	Terrestrial ecosystems Fauna	The Flora and Fauna Division submission on the referral included best practice recommendations to further reduce the risks and impacts of animal entrapment in trenches during construction. The SER states that the CEMP will consider the Flora and Fauna Division’s recommendations, noting that the pipeline will be mostly above-ground with the longest trench about 200m in length.

Section of SER	Theme / issue	Comment						
Appendix D – Mitigation and management measures	Impacts from pipeline trenching	Whilst the terrestrial trench management mitigation measures outlined in Appendix D mostly incorporates the Flora and Fauna Division’s recommendation, there are two mitigation measures that the Flora and Fauna Division considers do not meet minimum best practice.						
		<table><tr><th>SER mitigation measure (Appendix D)</th><th>Flora and Fauna Division recommendation</th></tr><tr><td>Inspections of the entire length of open trenches are undertaken at least <u>once</u> per 24-hour period (ideally immediately post dawn).</td><td>Inspections of the entire length of open trenches are undertaken at least <u>twice</u> daily, the first within 2 hours of first light and the second mid to late afternoon. Additional checks during the middle of the day are recommended in exposed areas during hot periods.</td></tr><tr><td>If fauna is detected in the trench, advice will be sought from a suitably qualified person with fauna handling experience.</td><td>An adequate number of qualified fauna handlers are available to inspect and clear the entire length of open trench each day, within the conditions of their wildlife permits.</td></tr></table>	SER mitigation measure (Appendix D)	Flora and Fauna Division recommendation	Inspections of the entire length of open trenches are undertaken at least <u>once</u> per 24-hour period (ideally immediately post dawn).	Inspections of the entire length of open trenches are undertaken at least <u>twice</u> daily, the first within 2 hours of first light and the second mid to late afternoon. Additional checks during the middle of the day are recommended in exposed areas during hot periods.	If fauna is detected in the trench, advice will be sought from a suitably qualified person with fauna handling experience.	An adequate number of qualified fauna handlers are available to inspect and clear the entire length of open trench each day, within the conditions of their wildlife permits.
		SER mitigation measure (Appendix D)	Flora and Fauna Division recommendation					
		Inspections of the entire length of open trenches are undertaken at least <u>once</u> per 24-hour period (ideally immediately post dawn).	Inspections of the entire length of open trenches are undertaken at least <u>twice</u> daily, the first within 2 hours of first light and the second mid to late afternoon. Additional checks during the middle of the day are recommended in exposed areas during hot periods.					
		If fauna is detected in the trench, advice will be sought from a suitably qualified person with fauna handling experience.	An adequate number of qualified fauna handlers are available to inspect and clear the entire length of open trench each day, within the conditions of their wildlife permits.					
		The Flora and Fauna Division acknowledges that the Project will not involve extensive pipeline burial, and that trenches are unlikely to remain open for extended periods, however the Flora and Fauna Division reiterates that the recommendations provided are considered best practice and that the proponent should update the mitigation measures proposed for trench management.						
5. Responses to submissions	Marine environmental quality	The Flora and Fauna Division submission on the referral included a recommendation that hydrodynamic modelling be updated to include high wave conditions and explicitly assess the duration and ecological consequences of short-term exposure of benthic habitats to the plume under these scenarios, as high energy conditions are likely to be frequent during wet seasons.						
7.1 SEA: Marine ecosystems	Unquantified Wave							
Appendix A – Updated modelling report	Influence on Plume Mixing	The SER includes updated hydrodynamic modelling to include wave conditions which shows the mixing zone is slightly reduced in size compared to the initial model and confirm the plume remains buoyant and vertically constrained, with no interaction with the seabed even under high energy conditions.						

Section of SER	Theme / issue	Comment
		The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation and considers the resulting risk to benthic habitats from the Project is low.
5. Responses to submissions Appendix E – Marine monitoring strategy	Marine environmental quality Impact beyond the mixing zone – model validation	The Flora and Fauna Division submission on the referral included a recommendation that water and sediment monitoring to be undertaken at sites within and beyond the mixing zone to validate the model during project construction and operation in an appropriate water quality management plan. The SER includes a commitment to implementing a Receiving Environment Monitoring Program (REMP) that includes water quality sampling within and beyond predicted mixing zones to validate modelling results. This validation will inform any required amendments to the long-term Marine Environmental Monitoring Program (MEMP). The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation.
5. Responses to submissions	Marine environmental quality Potential for Re-mobilization of Historical Sediment Contamination	The Flora and Fauna Division submission on the referral included a recommendation that future monitoring of water and sediment quality under the CEMP and Operational Environmental Management Plan (OEMP) attempt to resolve Quality Assurance/ Quality Control (QA/QC) issues and technical challenges to ensure all data can be reliably compared to baseline conditions as monitored under the MEMP. The SER includes a commitment to resolving these technical challenges in future monitoring under the CEMP and OEMP to ensure comparability with baseline data. The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation.
5. Responses to submissions 7.2 SEA: Marine environmental quality	Marine environmental quality Turbidity thresholds for the CEMP	The Flora and Fauna Division submission on the referral included a recommendation that suitable local turbidity datasets that capture tidal and seasonal variation are sourced or generated to support the calculation of turbidity thresholds for the CEMP. The SER includes a marine turbidity monitoring program which has been designed to collect near-real time turbidity (NTU) and underwater light (PAR) measurements every 15 minutes as part of the REMP (Appendix E). This program is designed for implementation prior to construction to collect

Section of SER	Theme / issue	Comment
Appendix E – Marine monitoring strategy		time-series data during tidal and seasonal variations, allowing for the establishment of more representative and ecologically relevant turbidity thresholds. The REMP will then continue into the Operational phase to inform adaptive management. While the pre-construction phase of this program is critical in the development of suitable turbidity and light thresholds, the Program does not specify a pre-construction duration. It is recommended that the pre-construction phase run for a minimum of three consecutive neap-spring tides across the wet, dry, and transitional seasons, as per recommendations in the Northern Territory Environment Protection Authority (NT EPA) Guidelines for marine biodiversity.
5. Responses to submissions Appendix C – Updated noise and vibration assessment Appendix D – Mitigation and management measures	Marine ecosystems Noise and Vibration - Potential for Impact Piling	The Flora and Fauna Division submission on the referral included a recommendation that full noise modelling for impact piling be undertaken and that a detailed mitigation plan specifically for impact piling scenarios be provided. The SER includes updated noise modelling to account for impact piling scenarios (Appendix C). A detailed mitigation plan, including observation zones, shut-down zones, and soft-start procedures, is included in Appendix D and is considered adequate to reduce risks to sensitive marine fauna. The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation.
5. Responses to submissions 7.1 SEA: Marine ecosystems 7.2 SEA: Marine environmental quality	Marine ecosystems Sub-optimal Seagrass Survey Timing	The Flora and Fauna Division submission on the referral included a recommendation that a re-evaluation of seagrass presence and density be conducted during the optimal growth period (typically November) or, alternatively, detailed justification be provided for the sufficiency of the current September survey data to represent peak seasonality. The SER includes discussion of an additional benthic habitat survey conducted in November 2025 during the peak growth period. This survey confirmed the presence of 0.77ha of sparse seagrass within the marine footprint, consisting of three species: <i>Halophila ovalis</i>, <i>Halophila spinulosa</i> and <i>Halophila uninervis</i>. These species are opportunistic, with high recovery potential. The seagrass within the proposal footprint is of lower ecological value relative to the immediate local area (Milner Bay) and the broader Groote Eylandt region. Seagrass within the marine footprint is highly seasonal, low density and unlikely to provide critical habitat for transient marine fauna.

Section of SER	Theme / issue	Comment
Appendix B – Updated significant impact assessments		Due to the buoyant nature of the plume, seagrass in this area is also unlikely to be impacted by direct exposure to the water quality characteristics within the mixing zone. Updated dispersion modelling predict no zones of moderate or high impact from suspended sediments. Localised deposition is also predicted to remain significantly below conservative ecological thresholds.
Appendix E – Marine monitoring strategy		The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation and considers the resulting risk to benthic habitats from the Project is low.
5. Responses to submissions 7.1 SEA: Marine ecosystems 7.2 SEA: Marine environmental quality Appendix A – Updated modelling report Appendix D – Mitigation and management measures	Sea – all factors Cumulative Impacts - Narrow Definition and Assessment	The Flora and Fauna Division submission on the referral included recommendations that a broader and more integrated assessment of cumulative impacts be undertaken, explicitly analysing the interplay between project-specific stressors and existing, ongoing background environmental pressures from all Port operations and other human activities. The Flora and Fauna Division highlighted effluent discharge and cumulative shipping noise as two specific instances where cumulative impacts had not been adequately addressed. The SER includes results of modelling the cumulative interaction, incorporating wave influence with the Alyangula sewerage treatment plant effluent discharge. The assessment showed minimal change to the predicted mixing zones under a cumulative scenario. The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation and considers the cumulative risk of discharge exposure from the Project is low. The SER includes a semi-quantitative cumulative shipping noise assessment which considers project vessel noise emissions in the context of existing baseline vessel activity at the port (Appendix C). The Flora and Fauna Division considers this assessment adequate and the resulting impact to sensitive marine fauna from cumulative noise exposure to be low. The Flora and Fauna Division is satisfied that the proponent has adequately addressed the recommendation.

Attachment 2

Submission on Supplementary Environmental Report

Groote Eylandt Mining Company Pty Ltd – GEMCO Excess Water Disposal Project

This submission is made under regulation 123 of the Environment Protection Regulations 2020

NT EPA reference number: EP2025/043

Government authority: Department of Lands, Planning and Environment – Mining Division

Summary:

Previous advice provided by the Mining Division regarding the original submission indicated that the proposal included insufficient information to determine the extent of the cumulative impact associated with the existing GEMCO mine and surrounding marine environment. This second submission has not satisfactorily addressed this issue. Overall, the submission has substantial deficiencies that prevent detailed and accurate assessment. These are summarised as follows and detail is provided in the table below.

- Sec 2.4 - Insufficient information provided regarding temporary works and reference to relevant parts of Deemed Mining Licence DML0126-01 (i.e. section of the Mining Management Plan and conditions of Authorisation) are missing;
- Sec 7.2.4 - PASS/AASS assessment inadequate and no assessment undertaken for additional proposed disturbance area (0.15 ha);
- Sec 7.2.5 – inadequate and contradictory assessment of cumulative impacts to water quality, including dispersion modelling;
- Table 15,16,17 – Environmental risk analysis is high level and does not substantiate consequence rating reduction;
- Figures 13 to 19 – Images are illegible, impeding assessment;
- Appendix A Marine Discharge Modelling Report – Significant deficiencies (see detailed comments), impeding assessment;
- Appendix E Marine Monitoring Strategy - Significant deficiencies (see detailed comments), impeding assessment.

Section of referral or terms of reference	Theme / issue	Comment
Section 2.4	Temporary works within marine footprint	Reference to an existing onshore dredge disposal area, including location and underlying land tenure is made in Section 2.4. More information is required on the quantity and quality of material requiring land disposal, disposal location and management measures including water management. Specific reference should be made to relevant sections of the approved MMP or Authorisation (DML0126-01).
Section 7.2.4	Sediment characteristics	Insufficient data is provided to substantiate the conclusion that there is a low likelihood of encountering Potential Acid Sulfate Soils (PASS) or Actual Acid Sulfate Soils (AASS) material during construction. The sample number is low, sampling depth is inconsistent, and empirical data is not tabulated. A figure showing sampling locations is not provided. Chromium reducible sulfur was completed on only 5 sediment samples, and interpretation is limited to a summary sentence (no data is presented). The location and depth of the 5 samples are not discussed. Similarly, the Emerson class is provided for only 5 samples. Sample location and depths are not provided. No data has been provided for the additional 0.15ha disturbance proposed.
Section 7.2.5	Modelling of potential cumulative impacts	<i>"As the STP outlet is already in operation, the assessment solely focused on nutrients that are also present in the mine water discharge plume.</i> <i>Key outcomes of the cumulative assessment include:</i> <i>No cumulative effects between aluminium and iron discharge from the mine water discharge and treated effluent discharge is expected."</i> <i>"There is potential for cumulative effects for nitrate..."</i> The text is contradictory and indicates there is potential for cumulative effects for nitrate. Whilst identified, the nitrate finding is not discussed further, and no avoidance or mitigation measures are proposed. It is unclear whether the potential cumulative impact(s) of key metals was assessed.

Section of referral or terms of reference	Theme / issue	Comment
	Dispersion modelling of suspended sediments and deposition during discharge activities	<i>"Additionally, waves were also included in these simulations, ..."</i> The text suggests that wave modelling was completed only in relation to suspended sediments. Identify, and discuss all simulations in which waves were included.
Table 15, 16, 17	Environmental risk analysis	The risk analysis presented is deficient. The environmental values are too broad and any reduction in consequence rating is not substantiated.
Figures 13-19	Figure quality	The figures are too small, and Figure 13 has no scale.
Appendix A Marine Discharge Modelling Report January 2026	2.5 Ambient turbidity/suspended solids 3.4 Water quality objectives	Adequacy of baseline data Sites PN1-PN4 and PS13-PS16 from the MEMP were selected to represent ambient conditions. The locations are not shown on a figure, and only median values are provided in Table 3. It appears that data from all eight sites are considered collectively (as a mean or median?) and spatial variances are not discussed. The appropriateness (representativeness) of PN1-PN4 and PS13-PS16 as reference sites cannot therefore be assessed. The data (date range) used to derive the proposed ambient water quality objectives and dilution ratios, is not defined or is inconsistent. For example, March 2015 to July 2023, and 2014 to 2020 data were used for nitrate and TSS respectively. The limit of reporting (LOR) for total suspended solids (TSS), nutrients and salinity are problematic (too high). Use of half of the LOR has been applied inconsistently (e.g. to nitrate, but not TSS). Justification is not provided for the inconsistent application of half the LOR, and there is no commitment to rectify it (review existing GEMCO programs). Whilst TSS has been measured as part of the MEMP, the post 2020 LOR of 5mg/L prevents meaningful interpretation of the data. The use of turbidity as a surrogate for TSS and discharge performance, is not demonstrated.

Section of referral or terms of reference	Theme / issue	Comment
	3.4 Water quality objectives Marine trigger values	The appropriateness of using the 80 th percentile at PN1-PN4 and PS13-PS16 to benchmark reference condition cannot be assessed (given the information gaps and absence of raw/tabulated data).
		The submission does not demonstrate that PN1-PN4 and PS13-PS16 are not impacted by the existing treated effluent discharge.
		Whilst reference is made to 'marine trigger values' the values proposed are not applied in the conventional way. They have been used to calculate the dilution ratios and inform modelling to predict the ('worst case' i.e. nitrate) mixing zone. Except for photosynthetic active radiation (PAR) no quantitative trigger values were proposed.
	3.4 Water quality objectives Discharge water quality	Adequacy of pit water/treated effluent data <i>"Discharge water quality was largely defined by IPE (2023b) to the 95th percentile of the volume-weighted mixed analyte concentrations on the basis of long-term monthly monitoring by GEMCO at a range of mine pits."</i> Table 3 provides summary data only, and for all pits. It cannot be determined if the water quality across all 20 pits is consistent. The text refers the reader to IPE 2023b, but this document (or IPE 2023c) is not provided in the submission. In relation to IPE 2023c, the appropriateness of the proposed pH trigger value cannot be assessed. The approach to deriving the 95th percentile of the volume-weighted mixed analyte concentrations, is questionable given any assumed flow rate/volume, and/or pit water quality will likely change over the life of mine. Practically, all 20 pits will not be dewatered concurrently. GHD 2026 refers to <i>"projected mine water discharge flow rates from each quarry provided by GEMCO for the financial years 2025-2031"</i> but no information is provided to this data set, or assumptions made. An

Section of referral or terms of reference	Theme / issue	Comment
		assessment against the activities and schedule in the MMP (DML0126-01) therefore, cannot be made.
		Metal and metalloid discharge contaminant loads have not been considered. IPE 2023a reported the dissolved metal and metalloid fractions, and not total. The suspended sediment concentration's (SSC) data/ modelling discussed largely relates to sediment deposition, and bioaccumulation. The conclusion regarding Mercury in sediment suggests that (total) data is available to calculate contaminant loads.
	3.8 Treated effluent quality	Insufficient data is provided to understand the quality of the existing treated effluent quality. Table 7 provides the 95th percentile of select metals and nutrients, but the date range is not provided or consideration given to any temporal variation. The plant currently operates and discharges to Milner Bay without a WDL. WDL163-01 expired on 3 November 2012. The absence of any reporting requirement(s) under a WDL makes it difficult to ascertain plant performance.
Appendix E E1 Marine Monitoring Strategy	Parameters Preliminary thresholds	<i>"At each location, turbidity and underwater light (photosynthetic active radiation - PAR) will be monitored".</i> This is the only reference to PAR in the SER. PAR data has not been provided or discussed, and its choice as the only threshold is peculiar. The water chemistry data indicates that nutrients and select metals are the key contaminants of concern, and no causal link to PAR has been provided.
	Adaptive management – threshold determination	Page 121 indicates that turbidity at pit NH2 (it is assumed that all discharge will occur via NH2) will be monitored in real time. The relationship between turbidity and TSS has not been adequately established, and whilst useful, real-time turbidity must be supported by

Section of referral or terms of reference	Theme / issue	Comment
		other indicators for example pH and electrical conductivity (EC), and regular measurement of pit water chemistry.
	Program duration	<i>"The REMP will be established prior to the commencement of construction to collect baseline water quality data."</i> It is not clear if this statement is outdated, or if additional or more recent baseline data will be collected.
General	Requirement for an Environmental (mining) licence	The disposal of mine affected water to the marine environment is not an approved activity under the mining provisions of the EP Act. The mine operates under deemed mining licence DML0126-01, and in accordance with the accepted MMP and Authorisation. An environmental (mining) licence (tailored mining licence) will therefore be required. The licence will be conditioned to capture commitments made in this application, Assessment Report and any Environmental Approval issued pursuant to section 106 of the EP Act. This will include but not be limited to, the development of plans e.g. CEMP, OEMP, REMP and ESCP, model verification and pre-clearance survey requirements.
	Titles Interests	Any activity authorised under an environmental (mining) licence is subject to the limitations of the underlying mineral title (subject to the <i>Mineral Titles Act 2010</i>). Whilst the road from the mine site to the Milner Bay Port Facility is within mineral title MLN956, the port and wharf infrastructure are underlain by four Special Purpose Leases, the conditions of which (including duration) must be considered. Similarly, the proposed realignment of the road must be confirmed within MLN956 or an application to modify the title made. Advice should be sought from the Mineral Titles Branch, Department of Mining and Energy.

Section of referral or terms of reference	Theme / issue	Comment
	Decommissioning, rehabilitation and Closure	Maintenance of the discharge infrastructure, and decommissioning and remediation of the pipeline/land within the alignment, diffuser and outfall area has not been considered by the applicant. The duration of the activity is also not clearly defined. More information is required on these aspects of the proposed project.

Attachment 3

Submission on the Referral

Groote Eylandt Mining Company Pty Ltd – GEMCO Excess Water Disposal Project

This submission is made under regulation 123 of the Environment Protection Regulations 2020

NT EPA reference number: EP2025/043

Government authority: Department of Lands, Planning and Environment – Environment and Heritage Division - Heritage Branch

Summary: All issues raised in DLPE2025/0235 have been addressed by the applicant

Section of Referral	Theme or issue	Comment
Supplementary environmental report	People: Culture and Heritage	Applicant has addressed or amended all issues previously raised by the Heritage Branch. No further changes are recommended for this application.