

Submission on the significant variation

Castile Resources Pty Ltd– Rover 1 Project

This submission is made under regulation 171 of the Environment Protection Regulations 2020

Government authority: Aboriginal Areas Protection Authority (AAPA)

Section of Referral	Theme or issue	Comment
Main report section 2 Pg 3	Nature of Variation	- This Variation, comprising relocation of infrastructure, removal of processing facilities and gas pipeline, does not materially change the comments made by AAPA on the proponent initiated EIS referral (statutory notice 4 October 2023). - The main issues identified in the proponent initiated EIS referral are not addressed in this submission.
Main report 4.1.3 Pg 14 Table 4-1 Pg 18	Changes to groundwater	- The report refers to modelling being undertaken in accordance with the TOR for the EIS. - Changes to the groundwater regime are expected due to plans for dewatering the underground mine and pumping from a borefield, which may have an effect on Aboriginal sacred sites if present.
Main report 4.1.8 Pg 16 Table 4-1 Pg 20	Identification of sacred sites	- The report states that '<i>no registered or recorded sacred sites, or restricted work areas on exploration licence in retention (ELR) 29957 within which the development envelope is located.</i>' - Note that the Abstract of Records only reflects knowledge of the area at the time of the request for information. - There has been no research by AAPA in the proposed mine area and therefore the presence of sacred sites is unknown. - The absence of research undertaken in an area should not be interpreted to mean that sacred sites do not exist in the area.
Main report 4.1.8 Pg 16 Table 4-1 Pg 20	Authority Certificate	- The proponent states that they intend to obtain an Authority Certificate. - An application for an Authority Certificate should describe all activities, including groundwater drawdown resulting from mine dewatering and borefield water supply described in this report and the proponent initiated EIS referral. - We recommend works should not commence until an Authority Certificate is obtained.