

Submission on proponent initiated EIS referral information and draft terms of reference

Castile Resources Pty Ltd – Rover 1

This submission is made under regulation 53 of the Environment Protection Regulations 2020

NT EPA reference number: EP2023/030

Government authority: Aboriginal Areas Protection Authority

Summary: The proponent refers to various activities and impacts that are not yet known. The Environmental Impact Statement (EIS) has identified potential impact pathways but has not assessed the risks to the environment from these pathways. Therefore the information provided does not appear to meet the requirements of the proponent's draft Terms of Reference.

Section of referral or terms of reference	Theme / issue	Comment
Main report 2.24 Pg 6 Pg 40 Appendix B 2.5.3 Pg 14	Presence of groundwater dependent ecosystems (GDEs) Significant vegetation types	<ul style="list-style-type: none"> States that there was no data available for the Project area and that GDEs are not considered further in this report. It is unclear whether that means the area has been mapped and there are no GDEs or it is an area that has not been mapped. Aboriginal sacred sites are present in the region that are groundwater dependent. This includes sites with features such as trees and soaks. AAPA has not conducted any specific research in the mine area. Sacred sites that are groundwater dependent may be present in the area. States that there are no GDEs within the Project area and identifies the presence of <i>C. opaca</i> and <i>C. aparrerinja</i> However, <i>C. opaca</i> and <i>C. aparrerinja</i> are noted as groundwater dependent in other arid area studies. These tree species are elements of known sacred sites in the region.
Main report Table 2-3 Pg 9 Figure 2-3 Pg 11	Location of site activities	<ul style="list-style-type: none"> States that the location of the borefield will be informed by the proposed groundwater investigation (yet to be conducted). Therefore this EIS has not considered potential impacts from groundwater extraction from the borefield. The locations of the borefield, haul road, septic system, landfill, and gas pipeline corridor are not shown in Figure 2-3.
Main report 2.4 Pg 10	Land clearing	<ul style="list-style-type: none"> We recommend the proponent apply for an Authority Certificate prior to any land clearing works. <i>C. opaca</i> and

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Appendix B 3.2 Pg 15		C. aparrerinja are noted in the study area and are known to be elements of sacred sites in the region.
Main report 5.4.1 Pg 44	Groundwater aquifers	<ul style="list-style-type: none"> Data indicates the water table is shallow and the likelihood of some connection between shallow and deep aquifers. Therefore groundwater extraction has the potential to impact GDEs, which may include Aboriginal sacred sites if present in the vicinity of the box cut, mine and borefield.
Main report 5.7.1 Pg 54	Sacred sites	<ul style="list-style-type: none"> Note that the Abstract of Records only reflects knowledge of the area at the time of the request for information. Castile's request for an Abstract of Records was in May 2009. There has been no research by AAPA in the proposed mine area and therefore the presence of sacred sites is unknown. The lack of research undertaken in an area should not be interpreted to mean that sacred sites do not exist in the area.
Main report 5.7.3 Pg 55	Authority Certificate	<ul style="list-style-type: none"> The proponent states that they intend to obtain an Authority Certificate. An application for an Authority Certificate should include all activities that may disturb the environment, including ground disturbance, discharges, and groundwater drawdown resulting from mine dewatering and borefield water supply described in this report. Activities should not commence until an Authority Certificate is obtained.
Appendix G Appendix I	Groundwater modelling and investigations	<ul style="list-style-type: none"> Groundwater modelling is limited to dewatering for the construction of the box cut. Modelling of the groundwater drawdown due to mine dewatering and groundwater drawdown associated with the borefield should be undertaken. Groundwater investigations should include the underground mine area and the borefield in addition to the box cut.
Appendix J 7.1	Cultural survey	<ul style="list-style-type: none"> States that no sites of cultural significance were recorded during the survey. However, the presence of Aboriginal sacred sites is unknown, as the proponent has not obtained an Authority Certificate.
Terms of Reference Table 1 Pg 5-9	Minimum information requirements	<ul style="list-style-type: none"> Some of the activities described are not assessed in the EIS.
Terms of Reference 2.3.1 Pg 11	Cultural values	<ul style="list-style-type: none"> The proponent has not obtained an Authority Certificate. Obtaining an Authority Certificate is considered to be an important aspect of the requirement to understand and protect Aboriginal cultural values.

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Terms of Reference 2.4 Pg 11	Information requirements for environmental factors	<ul style="list-style-type: none">• The information requirements for each environmental factor have not been completed for all activities in the EIS.
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