

Referral submission template for government authorities

Finniss Lithium Project BP33 Underground Mine

Core Lithium Limited

This template is provided for use by government authorities making a submission on an accepted referral for consideration under section 48 of the *Environment Protection Act 2019*. Additional comments may be attached separately if required.

At this initial stage of the environmental impact assessment process, feedback is sought on whether or not the NT EPA should assess the proposal and, if so, what level of assessment is considered appropriate.

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Agency Name:	Department of the Chief Minister (DCM)
Proponent and Action: (NT EPA to complete)	
Does the action require a statutory approval/ licence/ permit under legislation administered by your agency? If so, please list and/or explain.	No
Does the proposed action meet relevant legislation, accepted standards, plans or policies administered by your agency? Please explain.	n/a
Future involvement of the agency if the action proceeds through environmental impact assessment: <ul style="list-style-type: none"> No further involvement Provide for information only Provide for advice 	Provide for advice
Has your agency had prior dealings with the proponent? If so, is there knowledge of the proponent's compliance (or non-compliance) with approvals and legislation?	No direct dealings with the Proponent
Does the referral provide adequate information for your agency to provide comment on the action?	The referral states that 'the Social Impact Assessment and Management Plan prepared for the Grants Lithium

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	<p>Project adequately capture the risks associated with an extension to the life of the mine' (pg. 41).</p> <p>As the referral does not provide information specifically regarding potential social impacts and proposed mitigations for the Finniss Lithium Project, it is not possible to assess the proposed action's potential social impacts.</p> <p>The referral could provide further information on the socio - economic impacts of the Finniss Lithium Project such as workforce and impact/opportunities for local businesses.</p> <p>The proposal also does not provide an assessment of the project's greenhouse gas emissions. Without this information it is not possible to assess these emissions as a portion of the Northern Territory's total emissions.</p>
Does the referral provide adequate information of surrounding land uses and other potential pressures on the environment?	The referral does not contain adequate information regarding potential pressures on the social and economic environment and the impact on the Territory's total greenhouse gas emissions.
Does the referral present an adequate level of information of the environment likely to be impacted?	Yes
Have all environmental factors with the potential to be significantly impacted by the action been identified in the referral?	The environmental factors of Air and People have been identified but not appropriately addressed in the referral as outlined below.
Is the referral accurate in its preliminary identification and assessment of likely significant impacts?	It is not possible for DCM to comment on the potential for significant impact based off the current information provided in the referral on social impacts, stakeholder engagement and greenhouse gas emissions.
Are the claims and findings of the referral supported by adequate information?	<p>In the referral the proponent states that the other environmental factors (apart from groundwater hydrology) have been studied in sufficient detail to conclude that the proposal is unlikely to have a significant impact. Given that the referral states that 'the Social Impact Assessment and Management Plan prepared for the Grants Lithium Project adequately capture the risks associated with an extension to the life of the mine' (pg. 41), insufficient evidence is presented to support the claim that there is no potential for significant social impact.</p> <p>As stated above, the information provided on the economic impacts of the project and how the project will engage with local job seekers and businesses could</p>

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	<p>be supported by further data on potential employment levels from the local community, and how local job service providers and businesses will be engaged.</p> <p>There is a lack of information provided on the project's greenhouse gas emissions. Without a full assessment and estimate of the project's greenhouse gas emissions there is insufficient evidence to support the claim that there is no significant impact on the 'Air' theme.</p>
<p>Has the referral provided information to support any assumptions/ conclusions made about the cultural and social environments that may be impacted by the action?</p>	<p>DCM notes that limited stakeholder engagement with community on the extension of the existing project is outlined in the referral. Without adequate stakeholder engagement it is difficult to understand the potential impact on the social environment.</p> <p>The information provided in the referral regarding stakeholder engagement is missing some requirements outlined in the <i>Environment Protection Act 2019</i>, including the following:</p> <p>43 General duty of proponents</p> <p><i>A proponent of an action has the following general duties under an environmental impact assessment process:</i></p> <ul style="list-style-type: none"> <i>(a) to provide communities that may be affected by a proposed action with information and opportunities for consultation to assist each community's understanding of the proposed action and its potential impacts and benefits;</i> <i>(b) to consult with affected communities, including Aboriginal communities, in a culturally appropriate manner;</i> <i>(c) to seek and document community knowledge and understanding (including scientific and traditional knowledge and understanding) of the natural and cultural values of areas that may be impacted by the proposed action;</i> <i>(d) to address Aboriginal values and the rights and interests of Aboriginal communities in relation to areas that may be impacted by the proposed action;</i>
<p>Does the referral provide adequate information to demonstrate claims about opportunities and impacts to the NT economic environment?</p>	<p>There is a lack of data on potential employment levels from the local community, and how local job service providers and businesses will be engaged. Further information would allow for a more thorough assessment of the impacts and proposed mitigation measures.</p>

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Does your agency have additional information about the locality, action or circumstances of the action that has not been provided in the referral that will contribute to the NT EPA's decision on significant impact?	No
Does the action have the potential for significant impact on the environment?	<p>The referral states that 'the Social Impact Assessment and Management Plan prepared for the Grants Lithium Project adequately capture the risks associated with an extension to the life of the mine' (pg. 41).</p> <p>Ore from the Finniss Lithium Project will be transported 7km to the Grants Lithium Project to be processed. The life of the Grants Lithium Project was extended through a 14A amendment earlier this year to accommodate the extended life of the Finniss Lithium Mine.</p> <p>As the referral does not provide information specifically regarding potential social impacts and proposed mitigations for the Finniss Lithium Project, it is not possible to assess potential for significant impact.</p> <p>The scale of the project and workforce has the potential to have a significant impact. Further information could be provided to better understand the impacts of the project.</p> <p>The lack of information on the greenhouse gas emissions of the project does not allow for the significance of impact on the 'Air' theme to be assessed.</p>
If yes, can the action be assessed based on the information in the referral?	Further information would better inform assessment of the action.
If no, should the action be assessed as a SER, EIS or by assessment by inquiry?	It is not within DCM's remit to provide advice on recommended level of assessment.
If an SER is recommended please describe the matter that the proponent is required to further investigate	<p><u>Social Impact Assessment and Management Plan</u> DCM suggests that a Social Impact Assessment and Management Plan specific to the BP33 Project need to be undertaken in order to inform an understanding of potential social impacts and whether or not they have the potential to be significant impacts. Adjusting the existing work done for the Grants Project may not adequately capture the site specific impacts.</p> <p><u>Stakeholder engagement</u> Given the proximity of nearby communities such as Belyuen and Berry Springs and the previous community concern regarding the Grants Project, the proponent should demonstrate that relevant stakeholders and nearby communities are fully informed about this</p>

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	<p>specific project and its interaction with the other elements of the broader Finnis Lithium Project.</p> <p>Greenhouse Gas Emissions DCM suggests the proponent include, in line with the NT EPA's 'Air' environmental factor, an assessment of the project's greenhouse gas emissions. This will enable the impact of the project to be assessed as a portion of the NT's total emissions.</p>
<p>If an EIS is recommended, please describe the matters the proponent is required to further investigate (to be included in draft terms of reference for the EIS)</p>	<p>As above.</p>
<p>If an assessment by inquiry is recommended, please describe the issue to be examined by the inquiry (for inclusion in draft terms of reference)</p>	<p>As above.</p>