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# Chapter Three

## Stakeholder Engagement and Consultation

Winchelsea Island  
(Akwamburrkba)  
Manganese Mine: Draft  
Environmental Impact  
Statement

**PREPARED FOR:**  
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## Key Project Terms

Term	Definition or Elaboration
Adaptive Management	Systematic process for incrementally improving management practices by learning from the outcomes of past and current practices.
AUS China International Mining	AUS China International Mining Pty Ltd
CDM Smith	CDM Smith Australia Pty Ltd
Disturbance Envelope	Defined as the maximum area within which the Project disturbance could occur. The disturbance envelope for the Project encompasses 739 ha, inclusive of the terrestrial mining area and infrastructure, marine infrastructure, dredge spoil disposal area and transshipment area.
Environmental Aspect	An element of the Winchelsea Minings activities, products or services that can interact with the environment.
Environmental Impact	Change to the environment whether adverse or beneficial, wholly or partially resulting from Winchelsea Mining's environmental aspects. Environmental impacts can be caused directly or indirectly from a Project activity or cumulatively with other non-Project related activities in a set area.
Environmental Factor	The NT EPA listed environmental objectives to identify environmental matters that have value to the Northern Territory and that need to be protected; and to state the objective to be achieved for each matter. The NT EPA has prepared these environmental objectives and organised these in structured divisions of the environment, called environmental factors.
GHAC	Groote Holdings Aboriginal Corporation
Infrastructure Footprint	Defined as the area subject to direct placement of infrastructure and material inclusive of the terrestrial and wharf components. This area excludes the dredge spoil disposal area and transshipment area as no permanent physical infrastructure will be placed in these areas. The infrastructure footprint encompasses 339 ha within the Project area.
Project	The Project refers to the Winchelsea Island Manganese Mine Project. The Project includes establishment of a manganese mine extracting from nine separate extraction areas covering, associated terrestrial infrastructure, wharf and barge loading facility, dredged access channel, dredge spoil disposal, transshipment and cyclone moorings. The Project is inclusive of all infrastructure within the nominated Project area and directly associated activities occurring outside that area.
Project Area	The Project area is defined as wholly including mineral lease for exploration activities 32704, coastal and marine areas adjacent and connecting to mineral lease 32704, the dredge spoil disposal area and transshipment area. The entire Project area covers 1,680 ha.
Significant Impact	A significant impact of an action is an impact of major consequence having regard to: (a) the context and intensity of the impact; and (b) the sensitivity, value and quality of the environment impacted on and the duration, magnitude and geographic extent of the impact.
Sitzler	Sitzler Pty Ltd
Study Area	Refers to the area of survey or investigation for a specific study. This area may be beyond the Project area or disturbance envelope.
Tailings Storage Facility	A specially engineered and constructed impoundment into which tailings (residue) from the ore processing plant are deposited for placement in perpetuity. The storage facility is constructed with confining embankments consisting of earthen material (e.g., rock and soil) and capped following closure.
Winchelsea Island	Akwamburrkba

Term	Definition or Elaboration
Winchelsea Mining	Winchelsea Mining Pty Ltd
Xenith	Xenith Consulting Pty Ltd

## Acronyms, Abbreviations and Units

Abbreviation, Acronym or Unit	Definition
AAAC	Anindilyakwa Advancement Aboriginal Corporation
AAPA	Aboriginal Areas Protection Authority
ABS	Australian Bureau of Statistics
AFANT	Armature Fisherman's Association Northern Territory
ALARP	As Low As Reasonably Practicable
Al <sub>2</sub> O <sub>3</sub>	Aluminium Oxide
ANC	Acid Neutralising Capacity
ARC	Arnhem Coast
ASRIS	Australian Soil Resource Information System
ASS	Acid Sulfate Soils
CAN	Australian Company Numbers
ADT	Articulated Dump Truck
ALC	Anindilyakwa Land Council
Al <sub>2</sub> O <sub>3</sub>	Aluminium Oxide
ALRA	<i>Aboriginal Land Rights (Northern Territory) Act 1976</i>
Bcm	Bank Cubic Meter
BLF	Barge Loading Facility
BLM	Blue Mud Land System
BoM	Bureau of Meteorology
BWM	International Convention for the Control and Management of Ships' Ballast Water and Sediments
CD	Chart Datum
CEO	Chief Executive Officer
CP	Cemented Pisolite
CNZ	Central North Mineralisation Zone
CMZ	Central Main Mineralisation Zone
Cth	Commonwealth
CSD	Cutter Suction Dredge
CSZ	Central South Mineralisation Zone
DAFF	Department of Agriculture, Fisheries and Forestry
DAWE	Department of Agriculture, Water and the Environment
DCCEEW	Department of Climate Change, Energy, the Environment and Water

Abbreviation, Acronym or Unit	Definition
DEPWS	Department of Environment, Parks and Water Security
DIPL	Department of Infrastructure, Planning and Logistics
DITT	Department of Industry, Tourism and Trade
Dmt	Dry Metric Tonne
DWCD	Declared Water Control District
DWT	Dead Weight Tonne
EIS	Environmental Impact Statement
EIL	Ecological Investigation Level
EL	Exploration Licence
EMP	Environmental Management Plan
EMS	Environmental Management System
EP Act	<i>Environmental Protection Act 2019</i>
EPBC Act	<i>Environmental Protection and Biosecurity Conservation Act 1999</i>
EPL	Environment Protection Licence
ERA	Environmentally Restricted Area
EV	Electric Vehicle
ESC	Erosion and Sediment Control
ESCP	Erosion and Sediment Control Plan
Fe	Iron
FIFO	Fly-In Fly-Out
g/cc	Gram per Cubic Centimetre
GDE	Groundwater Dependand Ecosystem
GEMCO	Groote Eylandt Mining Company
GHG	Greenhouse Gas
Grt	Groote land
ha	Hectares
HDPE	High Density Polyethylene
hp	Horsepower
HVAS	High-Volume Air Sampler
IAP2	International Association for Public Participation
IBRA	Interim Biogeographic Regionalisation for Australia
IEA	International Energy Agency
IECA	International Erosion Control Association

Abbreviation, Acronym or Unit	Definition
ILUA	Indigenous Land Use Agreement
IPA	Indigenous Protection Area
IUCN	International Union for Conservation of Nature
JORC	Joint Ore Reserve Committee
Kfh	Keepers Hut Land System
kg	Kilogram
km	Kilometres
ktpa	Kilo tonnes per annum
kW	KiloWatt
LA	Los Angeles
LAT	Lowest astronomical tide
LDMA	Local Decision-Making Agreements
Lit1	Littoral 1 Land System
LOM	Life of Mine
LWM	Low Water Mark
m	Metre
m <sup>3</sup>	Cubic meter
m <sup>3</sup> /hr	Cubic meter per hour
MagL	Manganiferous Laterite
mbgl	metres below ground level
MIA	Mine Infrastructure Area
ML	Megalitres
MLWM	Mean Low Water Mark
ML/yr	Megalitres per year
MMP	Mining Management Plans
MMZ	Main Mineralised Zone
MN	Mangcrete
Mn	Manganese
MNES	Matters of National Environmental Significance
MP	Member of Parliament
MRCP	Mine Rehabilitation and Closure Plan
MSL	Mean Sea Level
Mt	Million Tonnes

Abbreviation, Acronym or Unit	Definition
mtpa	Million Tonnes per Annum
MW	Megawatt
NAF	Non-Acid Forming
NAGD	National Assessment Guidelines for Dredging
NEZ	North East Mineralised Zone
NEPM	Nation Environment Protection Measure
NLC	Northern Land Council
NT	Northern Territory
NT EPA	Northern Territory Environment Protection Authority
NW	North West
OGV	Ocean going vessel
P	Phosphorus
P <sub>2</sub> O <sub>5</sub>	Phosphorus Pentoxide
PC	Personal Computer
PCS	Process Control System
PID	Proportional-Integral-Derivative
PLT	Point Load Result
ppt	Parts per Thousand
PM	Pisolitic Manganese
PMLU	Post-Mining Land use
PM <sub>2.5</sub>	Particulate Matter 2.5 micrometres or less
PM <sub>10</sub>	Particulate Matter 10 micrometres or less
PSU	Practical Salinity Units
Pty Ltd	Propriety Limited
Que	Queue Land System
RC	Reverse Circulation
RMP	Risk Management Plan
ROM	Run of Mine
RDU	Royalties Development Unit
RORO	Roll-on Roll-off
RUSLE	Revised Universal Soil Loss Equation
Sea Dumping Act	<i>Environmental Protection (Sea Dumping) Act 1981</i>
SEP	Stakeholder Engagement Plan

Abbreviation, Acronym or Unit	Definition
SiO <sub>2</sub>	Silicon Dioxide
SOP	Standard Operating Procedures
SM	Silicious Manganese
SSC	Suspended Sediment Concentration
SSTV	Site-Specific Trigger Values
TEC	Threatened Ecological Communities
t	Tonnes
ToR	Terms of Reference
TPWC Act	<i>Territory Parks and Wildlife Conservation Act 2000</i>
TSF	Tailings storage facility
TSP	Total Suspended Particulates
USGS	United States Geological Survey
WA	Western Australia
WMP	Water Management Plan
WDL	Waste Discharge Licence

## **ACKNOWLEDGEMENT**

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**We acknowledge and thank the Anindilyakwa Land Council and the Traditional Owners of Winchelsea Island, for providing permission to access survey areas and collect data for the Winchelsea Island (Akwanburrkba) Manganese Mine Project Environmental Impact Statement and supporting studies.**



## Section 3 Stakeholder Engagement and Consultation

### 3.1 Engagement Purpose, Objectives and Outcomes

#### 3.1.1 Purpose and Objectives

Stakeholder engagement is an essential process in supporting the environmental impact assessment as it provides potentially affected and interested stakeholder(s) information about the Project's potential impacts and benefits. Additionally, it gives stakeholders the opportunity to communicate any concerns which will be taken into consideration during the Project design. Meaningful stakeholder engagement supports the early identification of issues, addresses community concerns and expectations into decisions that may affect them, and leads to better decision-making and outcomes.

The purpose of this section is to provide a summary of the stakeholder analysis and approach to consultation that has been conducted to date, based on a Project specific Stakeholder Engagement Plan (SEP) (Appendix A). The SEP has been developed to meet the requirements under the EP Act and the NT EPA's Stakeholder Engagement and Consultation – Environmental Impact Assessment Guidance for Proponents (NT EPA, 2021b).

The EP Act states that public consultation, particularly with Aboriginal people and communities, is an important part of environmental decision-making processes, and that public consultation:

- Provides for broad community involvement during the process of environmental impact assessment and environmental approval; and
- Recognises the role that Aboriginal people have as stewards of their country as conferred under their traditions and recognised in law.

The SEP aims to achieve the stakeholder engagement outcomes by:

- Creating a structured process focused on:
  - Building trust and mutual understanding between Winchelsea Mining and Project stakeholders;
  - Addressing statutory stakeholder consultation requirements; and
  - Meaningfully engaging with stakeholders, specifically with regards to the environmental assessment and approvals process.
- Providing opportunities for Winchelsea Mining to understand stakeholder values and expectations;
- Embedding the importance of using local contractors and employees as much as possible throughout the Project;
- Ensuring that Traditional Owners and Indigenous groups are engaged wherever possible;
- Securing stakeholder feedback that will be used as input for the environmental assessment process and to inform Winchelsea Mining's longer term activities and community involvement; and
- Aligning with Winchelsea Mining's corporate approach to stakeholder engagement.

### 3.1.2 Outcomes

Engagement for the Project has been focused on achieving the following outcomes:

- All identified key stakeholders are appropriately informed of the Project and relevant activities;
- The Project environmental assessment is completed in a manner that is consistent with the EP Act;
- Stakeholders are provided with meaningful opportunities to participate in consultation for the Project;
- Traditional Owners feel as they have been provided opportunities for meaningful engagement, that they have been listened to, and their culture and values respected; and
- The Project specific environmental risk assessment has been actively informed by the input and feedback received from stakeholders and where necessary, any adjustments to the Project as a result of this consultation has been considered.

## 3.2 Stakeholder Engagement Strategy

### 3.2.1 Overview of Approach

Winchelsea Mining is committed to undertaking their projects in a manner that will deliver on all regulatory requirements, and that will engage and contribute to the communities in which it operates. More broadly, Winchelsea Mining is focused on understanding and integrating those matters that will provide long-term outcomes aspired to by relevant stakeholders. To achieve this, the stakeholder engagement strategy for the Project has focussed on:

- Governance and systems frameworks to support the business operations and how Winchelsea Mining works with stakeholders;
- The formation of long-term, meaningful relationships and partnerships with stakeholders;
- Alignment with relevant NT standards regarding stakeholder impact assessment, management and social investment; and
- An active risk management approach and focus on creating long-term value for the communities where Winchelsea Mining operates.

### 3.2.2 Principles for Project Engagement

Winchelsea Mining actively builds community investment into its overall business and planning process. In developing its approach to Project engagement, Winchelsea Mining has referred to industry leading standards and practice including the NT Stakeholder Engagement and Consultation guidance (NT EPA, 2021b), NT guidance for preparing an environmental impact statement (NT EPA, 2021a), the International Association for Public Participation's (IAP2) Quality Assurance Standard For Community and Stakeholder Engagement (IAP2, 2015) and relevant International Finance Corporation guides (IFC, 2007).

Five key engagement principles have been developed to guide the approach of effective engagement, including:

- Focusing on achieving genuine outcomes for communities;
- Providing a flexible and proactive approach;
- Being visible and transparent;

- Where investment in communities is undertaken, supporting projects that encourage community self-sufficiency and sustainability; and
- Enhancing social return on investment through strategic reviews of outcomes.

To achieve the engagement objectives and outcomes it is important to define and explain the parameters of the Project including decisions that have already been made, decision-making processes and governance structures, statutory obligations, and regulatory requirements. When Winchelsea Mining engages with stakeholders, it is necessary that there is clarity regarding what 'can' and what 'cannot' be influenced with regards to the Project (as detailed in Appendix A). This is particularly important in terms of managing and aligning with stakeholder expectations.

### 3.2.3 Significant Variation Process

Changes to Project infrastructure and activities have been made which were not previously included as part of the original ToR (refer to Section 2.2- Relevant Legislation and Policies). The proposed changes would result in additional impacts beyond those previously considered by the NT EPA, and as such a 'Significant Variation' to the Project was requested, as described in Section 1.1.4- Regulatory Process and Section 2.2- Relevant Legislation and Policies. This process triggered an additional engagement step, that was not originally anticipated at the time of the referral.

A significant variation of an action is defined under section 12 of the EP Act as a variation that:

- a. Will alter the action to the extent that a referral trigger that did not previously apply to the action now applies;
- b. Has the potential to have a significant impact on the environment; or
- c. Will result in new or additional areas being subject to a potential significant impact on the environment (NT EPA, n.d.).

The significant variation process requires the variation to be placed on public exhibition for 30 business days and issued for review to the government agencies<sup>12</sup>. Within 30 business days following the conclusion of the public consultation process the NT EPA must determine:

1. Whether the proposal can continue within its existing environmental impact assessment process (i.e. by referral information, supplementary environmental report, an environmental impact statement process, or by inquiry);
2. Whether the proposal requires a different method of environmental impact assessment;
3. Whether a new environmental impact assessment is required for only the components of the significant variation;
4. Whether an environmental impact assessment is no longer required; or
5. For the EIS or inquiry methods only, that the assessment can continue with amended ToR (NT EPA, n.d.).

The Project has been formally varied twice and in each case the NT EPA determined that the existing EIS process could continue with amendments to the ToR. The outcomes of the significant variation process, including feedback received through the additional consultation stages, were incorporated into this Draft EIS.

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<sup>12</sup> NT EPA assessments in progress register: Winchelsea Island Manganese Mine Project: <https://ntepa.nt.gov.au/your-business/public-registers/environmental-impact-assessments-register/assessments-in-progress-register/winchelsea-island-manganese-mine-project>

### 3.3 Stakeholder Analysis

Stakeholder analysis was undertaken with a focus on understanding stakeholder values, concerns and opportunities arising from the Project, whilst also understanding potential impacts, risks, and levels of interest and influence. The intent of this initial analysis is to provide Winchelsea Mining with the foundation through which to inform the EIS and to continue engagement as the Project develops.

#### 3.3.1 IAP2 Core Values

Stakeholder values are valuable in identifying and understanding what aspects of the Project may be of importance. In accordance with the NT EPA stakeholder engagement and consultation guidelines (NT EPA, 2021b), consultation was guided by the principles of engagement, and based on stakeholder level of interest and concern as outlined by the International Association for public participation (IAP2). The IAP2 core values for practicing public participation and community engagement are:

1. Public participation is based on the belief that those who are affected by a decision have a right to be involved in the decision-making process;
2. Public participation includes the promise that the public’s contribution will influence the decision;
3. Public participation promotes sustainable decisions by recognising and communicating the needs and interests of all participants, including decision makers;
4. Public participation seeks out and facilitates the involvement of those potentially affected by or interested in a decision;
5. Public participation seeks input from participants in designing how they participate;
6. Public participation provides participants with the information they need to participate in a meaningful way; and
7. Public participation communicates to participants how their input affected the decision (IAP2, 2015).

The purpose of these core values is to help make better decisions which reflect the interests and concerns of potentially affected people and entities (IAP2, 2015).

#### 3.3.2 Key Stakeholders

Table 3.3-1 identifies the list of key stakeholder groups considered as part of the SEP. This list is preliminary and will be updated as the Project develops, noting that when the Draft EIS is released for public comment, additional stakeholders may be included. Therefore, the SEP is considered a live document that will be reviewed and updated by Winchelsea Mining.

**Table 3.3-1 Key Project Stakeholders**

Stakeholder Groups and Stakeholders
<b>Australian Government Ministers</b>
Minister for Indigenous Australians – The Hon. Linda Burney Member of Parliament (MP)
Member for Lingjari – Ms Marion Scrymgour MP
Minister for the Environment and Water – The Hon. Tanya Plibersek MP
<b>Australian Government Departments and Agencies</b>
Department of Climate Change, Energy, the Environment and Water – Melissa Brown (Environment Approvals Division Head)
National Indigenous Australians Agency – Jody Broun (Chief Executive Officer)

<b>Stakeholder Groups and Stakeholders</b>
Regional Development, Local Government & Regional Recovery – Mr. Joe Castellino (Acting First Assistant Secretary)
Northern Land Council – Joe Martin-Jard (Chief Executive Officer)
<b>Northern Territory Parliament</b>
Chief Minister – Hon Natasha Fyles
Minister for Mining and Industry – Hon Nicole Manison
Minister for Business, Jobs and Training – Hon Paul Kirby
Minister for Infrastructure, Planning and Logistics – Hon Eva Lawler
Minister for Environment, Climate Change and Water Security – Hon Lauren Moss
Minister for Aboriginal Affairs & Minister for Treaty and Local Decision Making – Hon Selena Uibo
<b>Northern Territory Government</b>
Northern Territory Environment Protection Authority – Dr Paul Vogel AM Chairperson
Department of Chief Minister and Cabinet
Department of Industry, Tourism and Trade
Department of Environment, Parks and Water Security
Department of Territory Families, Housing and Communities
Department of Health
Department of Infrastructure, Planning and Logistics
Territory Investment Commissioner – Andrew Cowan
Territory Major Projects Commissioner – Jason Schoolmeester
<b>Local government</b>
East Arnhem Regional Council
<b>Aboriginal and community organisations</b>
Annindilyakwa Land Council (ALC)
ALC Land and Sea Rangers
Anindilyakwa Advancement Aboriginal Corporation
Aboriginal Areas Protection Authority – established under the Northern Territory Aboriginal Sacred Sites Act – Mr Bobby Nunggumarjbarr Chairman
Groote Eylandt Aboriginal Trust
Aminjarrinja Enterprises
Angurugu Women’s Centre
Angurugu Men’s Shed
Angurugu Community Store
Anindilyakwa Housing Aboriginal Corporation
Umbakumba Cultural Centre

Stakeholder Groups and Stakeholders
<b>Community members</b>
Groote Eylandt residents – Alyangul, Angurugu, Umbakumba, and the four satellite communities (4 Mile, Malkala, Little Paradise, and Bartalumba Bay)
Bickerton Island residents – Milyakburra
<b>Businesses</b>
GEMCO
Alyangula Small Business owners (Post Office)
Groote Eylandt Car Rentals
Alyangula Mini Mart
Groote Eylandt Bakery
Groote Eylandt Bush Shop
Umbakumba Store
Groote Eylandt Touring Company
Xenith – Mining & Resource Consultants
Sitzler – Australian Construction Company
<b>Social services</b>
Alyangula Area School
Umbakumba School
Alyangula Primary Health Centre
Alyangula Police Station
<b>Interested organisations</b>
Mineral Council of Australia (NT Branch)
Amateur Fishermen's Association NT
Chamber of Commerce Northern Territory
NT Environment Centre
<b>Indigenous Media</b>
NITV
National Indigenous Times
Koori Mail
<b>Groote Eylandt Media</b>
Umbakumba Radio
Eylandt Echo
Social media - Facebook
<b>Northern Territory Media</b>

Stakeholder Groups and Stakeholders
NT News (business review)
ABC radio and TV
Channel 9
<b>National Media</b>
The Australian
The Financial Review
AM – ABC radio
<b>Mining Trade Media</b>
Australia's Mining Monthly
The Australian Mining Review

### 3.4 Identification of Potential Concerns and Opportunities

Potential concerns and opportunities that may be experienced by stakeholders during the lifecycle of the Project are outlined in SEP (Appendix A). The purpose of this identification is to understand stakeholder perspectives on what may be of concern regarding the Project, allowing Winchelsea Mining to understand potential impacts and risks to stakeholders.


The SEP provides initial identification of potential concerns and opportunities and as such must be re-visited once Winchelsea Mining has undertaken more detailed engagement with stakeholders during the life of the Project. It is important that as part of this, environmental concerns and opportunities are identified as these are often key areas of interest for stakeholders. Although the SEP is initially focused on the pre-construction phase, potential concerns and opportunities have been identified across the Project lifecycle as these perceptions and potential impacts influenced how stakeholders have been engaged from the beginning of the Project. As the Project progresses and further consultation is undertaken, the SEP will be updated accordingly to account for all phases of the Project.

### 3.5 Level of Engagement and Activities

The Project consultation associated with the Draft EIS and subsequent phases of the Project have been in accordance with the IAP2 principles to determine the appropriate levels of engagement (IAP2, 2015). As the Project progresses, the level of engagement will be identified and determined on a case-by-case basis and certain stakeholders may be involved to collaborate on aspects of the Project. Stakeholder engagement is an essential component in the process of assessing the Project's social, economic, and environmental impacts.

Table 3.5-1 provides the level of engagement outlined by the IAP2's public participation spectrum and Winchelsea Mining's relevant approach at each level. In this assessment, Level 1 stakeholders are the highest ranked in terms of Project involvement, with a level of participation including collaboration. Level 2 stakeholders can inform, consult and are involved in the Project, whereas Level 1 stakeholders are restricted to only inform and consult.

**Table 3.5-1 IAP2 Levels of Engagement**



Level of Engagement	Stakeholder Level	Approach to the Community and Stakeholders
Inform	1, 2, and 3	Winchelsea Mining will aim to keep stakeholders informed.
Consult	1, 2, and 3	Winchelsea Mining will keep stakeholders informed, listen to, and acknowledge concerns and aspirations, and provide feedback on how stakeholder input influenced the decision.
Involve	1 and 2	Winchelsea Mining will work with stakeholders to ensure that their concerns and aspirations are directly reflected in the assessment completed and control measures employed and provide feedback on how stakeholder input influenced decision.
Collaborate	1	Winchelsea Mining will look to stakeholders for advice and innovation in formulating solutions and incorporate their advice and recommendations into the decisions to the maximum extent possible.
Empower	1	Winchelsea Mining will implement relevant stakeholder decisions where appropriate and feasible.

Amended from IAP2 2015

For the purpose of managing the level of stakeholder engagement, stakeholders have been grouped as follows:

- Level 1: Landholders, Indigenous Stakeholders and Traditional Owners, Office of the Registrar of Indigenous Corporations entities: GHAC, AAAC, and Angabunamanja Aboriginal Corporation, surrounding tenure holders, and federal and territory governments;
- Level 2: Key interest groups (e.g., Armature Fisherman’s Association Northern Territory [AFANT]) and local communities; and
- Level 3: General public, community and special interest groups, wider region, and Territory-based organisations.

The engagement process is intended to be flexible and open to including relevant stakeholders to the maximum extent possible, whilst maintaining focus on targeted engagement where required.

Table 3.5-2 outlines the engagement style, depth of engagement and example activities for the stakeholders assigned to each engagement level. These engagement styles are based on the principle that engagement has been tailored by considering levels of stakeholder impact, interest, influence and risk – with the assumption that the higher the level of impact and risk – the deeper the level of engagement required. This approach needs to be flexible based on each specific stakeholder group and potential changes in stakeholder expectations and risk.

**Table 3.5-2 Different Styles of Engagement/Communication**

Engagement Style	Description	Example Activities
General (All levels)	<ul style="list-style-type: none"> <li>▪ Generalised provision of Project information and updates (this includes overview of potential impacts and mitigation/management strategies)</li> <li>▪ Opportunities to provide feedback through general activities and communication mechanisms (e.g., via website, email, as part of statutory consultation approach)</li> </ul>	<ul style="list-style-type: none"> <li>▪ Website</li> <li>▪ Project information sessions</li> <li>▪ Media releases</li> <li>▪ Public consultation process</li> </ul>



Engagement Style	Description	Example Activities
	<ul style="list-style-type: none"> <li>Audience: all stakeholders have access to information and activities</li> </ul>	
Targeted (Level 1 and 2)	<ul style="list-style-type: none"> <li>Targeted engagement and communications specific to stakeholder group</li> <li>Targeted engagement and communication activities designed to gain specific feedback</li> <li>Ongoing opportunities to provide feedback and discuss key Project elements (e.g., how potential impacts to a specific value could be managed)</li> <li>Audience: while information may or may not be publicly available, activities are targeted towards specific groups of stakeholders and are generally not open to 'general public'</li> </ul>	<ul style="list-style-type: none"> <li>Targeted group briefings or presentations</li> <li>Targeted group or individual meetings</li> <li>Targeted information portal e.g., International Union for Conservation of Nature (IUCN)</li> <li>Access to all general activities</li> </ul>
Individualised (Level 1)	<ul style="list-style-type: none"> <li>Engagement and communications developed for needs and expectations of specific stakeholder</li> <li>Focus on gaining specific feedback and input from individuals/small group of individuals</li> <li>Information in the form it was provided only accessible to specific party with which it was shared (e.g., while a Minister may be provided information about jobs etc. that is available to the public the content of the conversation will be confidential)</li> </ul>	<ul style="list-style-type: none"> <li>One-on-one meetings focused on specific topic of interest for both parties (e.g., negotiation of lease agreement or cultural heritage agreement)</li> <li>Negotiation of formal contract or partnership (e.g., supplier agreement)</li> <li>Shared value definition workshop/partnership regarding social investment</li> <li>Personalised email/phone conversations</li> </ul>
Regulatory (Level 1)	<ul style="list-style-type: none"> <li>Ongoing interaction with the regulator; this will be tailored depending on agency roles</li> <li>More structured and individualised engagement will occur with lead agency</li> <li>Ongoing opportunities to provide feedback</li> </ul>	<ul style="list-style-type: none"> <li>Structured meetings and communication schedule with lead agency</li> <li>One-on-one/group meetings as required</li> <li>Ongoing email and phone communication as required</li> </ul>

Considering different stakeholders will be engaged at different levels, Table 3.5-3 outlines the potential engagement levels and activities specific to each stakeholder group.

**Table 3.5-3 Engagement Activities by Stakeholder Groups**

Group	IAP2 Stakeholder Level	Engagement Style	Potential Engagement Activities <sup>13</sup>
Indigenous stakeholders, Traditional Owners	Level 1	Individualised	<ul style="list-style-type: none"> <li>Ongoing communication via email, phone, etc.</li> <li>Presentation to Traditional Owner Clans through regular ALC meetings</li> <li>On-Island (Groote Eylandt) information sessions</li> <li>One-on-one meetings (where relevant)</li> </ul>

<sup>13</sup> Note – these are potential engagement activities and not all activities may be undertaken for each stakeholder group. For example, should communication via email be considered sufficient to convey project understand and obtain necessary feedback, a one-on-one meeting may not be warranted.

Group	IAP2 Stakeholder Level	Engagement Style	Potential Engagement Activities <sup>13</sup>
or representative organisations			<ul style="list-style-type: none"> <li>▪ Partnerships with employment agencies / contractors</li> <li>▪ Statutory consultation period (General)</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Local and regional community	Level 2	General	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc. (where enquiry received)</li> <li>▪ On-Island (Groote Eylandt) information sessions</li> <li>▪ Statutory consultation period (General)</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Local and regional supplier and business organisations	Level 3	General	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc. (if required)</li> <li>▪ Partnerships with employment agencies / contractors</li> <li>▪ Statutory consultation period (General)</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Territory and federal politicians	Level 3	General	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc. (if required)</li> <li>▪ Statutory consultation period (General)</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Northern Territory Government agencies	Level 1	Regulator	<ul style="list-style-type: none"> <li>▪ One-on-one meetings</li> <li>▪ Technical meetings and briefings if required following review</li> <li>▪ Formal agency comments period</li> <li>▪ Ongoing email / phone communication</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Australian Government	Level 1	Regulator	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc.</li> <li>▪ Technical meetings and briefings (if required)</li> <li>▪ Website (General)</li> </ul>
Regional agencies / coordinating bodies	Level 3	General	<ul style="list-style-type: none"> <li>▪ Statutory consultation period (General)</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Neighbouring commercial businesses and local operators (e.g., GEMCO)	Level 2	Individualised	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc.</li> <li>▪ One-on-one meetings (if requested)</li> <li>▪ Statutory consultation period (General)</li> <li>▪ Website (General)</li> <li>▪ Media releases and media appearances (General)</li> </ul>
Interest groups	Level 2	General	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc. (specifically for AFANT)</li> <li>▪ One-on-one meetings (if requested by AFANT)</li> <li>▪ Statutory consultation period (General)</li> </ul>

Group	IAP2 Stakeholder Level	Engagement Style	Potential Engagement Activities <sup>13</sup>
			<ul style="list-style-type: none"> <li>Website (General)</li> <li>Media releases and media appearances (General)</li> </ul>
Public	Level 3	General	<ul style="list-style-type: none"> <li>Website (General)</li> <li>Statutory consultation period (General)</li> <li>Media releases and media appearances (General)</li> </ul>

### 3.6 Stakeholder Engagement to Date

Previous consultation about the prospect of Anindilyakwa mining manganese on Winchelsea Island became focused in the lead up to its application for an exploration licence in 2018. The AAAC informed and sought feedback primarily through monthly meetings with the ALC 24-member Board. Traditional Owners attend regular ALC, AAAC and GHAC board meetings on Groote Eylandt. The Boards, in turn, consults more broadly on important issues, like potential impacts on sacred sites and the environment, with a broader group of up to 240 Traditional Owners representing Anindilyakwa’s two clan groups. During engagement, concerns principally focused on:

- Whether blasting would impact songlines;
- The risk of manganese going into the sea; and
- Threatened species including the Northern Quoll, and the Northern Masked Owl which is understood by Traditional Owners to roosts in sandstone country to the north.

Winchelsea Mining believes it has addressed each of these concerns to date through either providing more information or modifying plans.

A summary of dedicated consultations is provided in Table 3.6-1 and relevant company meetings in which stakeholders were present (e.g., Traditional Owners) is provided in Table 3.6-2.

**Table 3.6-1 Description of Dedicated Traditional Aboriginal Owner and Community Consultations**

Description	Method of Consultation	Date	Outcome
Helicopter survey	A series of helicopter surveys with senior women Traditional Owners to investigate further site protection	22 – 23 October 2018	Sensitive sites on Winchelsea Island identified for restriction of mining and ongoing protection. Location of the coastal infrastructure confirmed as acceptable. Consideration for protecting animal species.
Helicopter survey	A series of helicopter surveys with senior men Traditional Owners to investigate further site protection	24 – 25 October 2018	Dreaming sites identified. Location of the coastal infrastructure confirmed as acceptable. Numerous instructions associated with mining restrictions provided.
Field survey	Field survey with Traditional Owners	17 July 2020	Survey of potential cultural heritage sites and areas within the Exploration Lease. Instructions associated with mining restrictions.
Field assessment	Field assessment with Traditional Owners	12 February 2021	Investigated proposed sites.

Description	Method of Consultation	Date	Outcome
Information meeting – ALC Boardroom, Alyangula	Meeting with affected Traditional Owners	16 February 2021	Discussed outcomes from initial fieldwork and proposed changes to plan.
Community consultation – Angurugu Aged Care	Meeting with elderly stakeholders to provide information on the Project and seek input.	3 March 2021	Identified important people for further consultations.
Helicopter survey	Helicopter facilitated field consultations and community consultations at Angurugu Men's Shed	18 – 19 March 2021	Identification and discussion of a proposed quarrying location on Winchelsea Island. Confirmation from Traditional Owner attendees that there were no sites of significance and no specific instructions.
Community consultation – Angurugu Mens Shed	Meeting with stakeholders to provide information on the Project and seek input.	19 March 2021	Participants gave in-principle support for the Project activities and specifically hard stone quarrying on Winchelsea Island.
Helicopter survey	Helicopter facilitated field consultations	23 April 2021	Identification and discussion of a proposed quarrying location on Winchelsea Island. Confirmation from Traditional Owner attendees that there were no sites of significance and no specific instructions.
Field visit for site protection of Lease 08	Field visit with senior Traditional Owners to confirm location of AAPA site 6170-40	14 October 2021	Field visit to establish the condition of track and impediments to future field visits.
Helicopter survey	A series of helicopter surveys with senior Traditional Owners to investigate further site protection	15 November 2021	No site protection issues were identified during the overflights.
Helicopter survey	A series of helicopter surveys with senior Traditional Owners to investigate further site protection	17 November 2021	Sites were visited and instructions received from Traditional Owners.
Boat survey	Boat facilitated survey with senior Traditional Owners to investigate coastal and marine areas.	23 March 2023	Identification of several marine Dreaming sites and consideration of Winchelsea activities. Agreement on proposal with stipulating (e.g., dredge placement location).

**Table 3.6-2 Organisation Meetings Involving Consultation**

Description of Engagement	Date	Stakeholder Comments/Issues Discussed
Joint meeting with Winchelsea Mining and AAAC	11 November 2019	<ul style="list-style-type: none"> <li>▪ Discussed 'exclusion zone' within EL27521.</li> <li>▪ Discussed the extension of barge landing.</li> <li>▪ Discussed licences (ELs) on the sea country. A letter from NLA was tabled about negotiating period for ELAs: 28189, 28090, 28091 and 28092.</li> <li>▪ Working on Island hinges (depends) on tides.</li> </ul>

Description of Engagement	Date	Stakeholder Comments/Issues Discussed
		<ul style="list-style-type: none"> <li>▪ Sandflies around camp is an issue. Aiming to break the breeding cycle of sandflies. A biting insect study was subsequently prepared with recommendations on how to mitigate associated impacts.</li> <li>▪ Proposed to woodchip vegetation instead of burning as it creates jobs and creates less pollution.</li> </ul>
Joint board meeting with Winchelsea Mining, AAAC and guest speakers from Winchelsea Staff	22 January 2020	<ul style="list-style-type: none"> <li>▪ The 'exclusion zone' within EL27521 for 'Ross' Creek' discussed. It is a dry creek.</li> <li>▪ Winchelsea said more infill drilling will be required once they get funding for Stage 2 of project.</li> <li>▪ Discussed licences (ELs) on the sea country. Winchelsea tabled letter from Northern Land Council (NLC) regarding the negotiating period for ELA's 28189; 28090; 28091 &amp; 28092.</li> <li>▪ Further discussion on NLC letter – Winchelsea to meet NLC regarding this in November 2020.</li> <li>▪ All work on island hinges around tides.</li> </ul>
AAAC board meeting	22 January 2020	<ul style="list-style-type: none"> <li>▪ Discussed Project funding.</li> <li>▪ Discussed progress and status of exploration program.</li> </ul>
AAAC board meeting with guests	17 March 2020	<ul style="list-style-type: none"> <li>▪ Discussed how the manganese resource is likely to extend into the exclusion zone.</li> <li>▪ Guest confirmed that the exclusion zones were initially drawn from computer records and should be field verified.</li> </ul>
AAAC board meeting with guests	16 April 2020	<ul style="list-style-type: none"> <li>▪ Presentation on the status of Winchelsea Island (Akwamburrkba) Manganese Mine Project.</li> <li>▪ Update on current financial position.</li> <li>▪ Discussions on funding.</li> <li>▪ Discussed formal correspondence with ALC.</li> <li>▪ Update on Winchelsea Mining Project exploration program.</li> <li>▪ Exclusion zones under exploration agreement were discussed.</li> </ul>
AAAC board meeting with guests	8 September 2020	<ul style="list-style-type: none"> <li>▪ Discussed environmental study requirements, permitting pathway and setting up a company website.</li> <li>▪ Discussions on funding.</li> <li>▪ Draft mining agreement from ALC.</li> </ul>
AAAC annual general meeting	8 October 2020	<ul style="list-style-type: none"> <li>▪ Status of the Winchelsea Mining project.</li> <li>▪ Map of mine of Winchelsea Island and the project areas and infrastructure planned for the mine.</li> <li>▪ Discussed Joint Ore Reserve Committee (JORC) report.</li> <li>▪ Discuss the Future Groote Major Projects Group.</li> <li>▪ Discussion about need for all entities to work together and not separately.</li> <li>▪ Discussed the progress of the mining agreement with ALC under ALRA.</li> <li>▪ Aiming for important meeting to announce the signing of the mining agreement and the JORC report – to be attended by the Attorney General and the Police Commissioner.</li> <li>▪ Discussed the financial report that had been prepared by accountants and approved by the directors.</li> <li>▪ Discussed the independent auditors report on the financials.</li> </ul>

Description of Engagement	Date	Stakeholder Comments/Issues Discussed
AAAC board meeting with guests	3 February 2021	<ul style="list-style-type: none"> <li>▪ Sections 19s and mining agreement.</li> <li>▪ Ran through structured diagram.</li> <li>▪ Territory Airports discussion.</li> <li>▪ Discussion with Yukida.</li> <li>▪ Meeting with Mining Trust.</li> <li>▪ Discussion on EIS Terms of Reference.</li> <li>▪ Discussion on office space in Darwin.</li> <li>▪ Discussed purchasing of a barge.</li> </ul>
AAAC board meeting with guests	4 March 2021	<ul style="list-style-type: none"> <li>▪ Discussed resolution for grant of funds with ALC.</li> </ul>
AAAC board meeting with guests	28 July 2021	<ul style="list-style-type: none"> <li>▪ Governance overview.</li> <li>▪ Organisation structure.</li> <li>▪ Winchelsea Island (Akwamburkba) Manganese Mine Project Activity overview.</li> <li>▪ Bankable feasibility study.</li> </ul>
Joint board meeting with Winchelsea Mining and AAAC	30 November 2021	<ul style="list-style-type: none"> <li>▪ Winchelsea EIS.</li> <li>▪ Mineral Lease application.</li> <li>▪ Gave PowerPoint presentation on project matters.</li> <li>▪ Water drilling.</li> <li>▪ Market interest.</li> <li>▪ Progress of section 19s.</li> <li>▪ Potential quarries.</li> <li>▪ Exploration Payment under exploration agreement.</li> <li>▪ What community want to achieve and the messages about the future after mining is finished by GEMCO.</li> </ul>
Joint meeting with GHAC, AAAC and Groote Aqua Aboriginal Corporation (GAAC)	27 January 2022	<ul style="list-style-type: none"> <li>▪ Report on projects and project matters</li> </ul>
Joint meeting with GHAC, AAAC and GAAC	3 June 2022	<ul style="list-style-type: none"> <li>▪ Winchelsea Mining Project update including timeline and document outlining next steps for the Winchelsea Project.</li> <li>▪ Winchelsea Mining activities and Xenith's work.</li> <li>▪ Requirements to engage numerous consultants to provide work / services in relation to the Winchelsea Mine.</li> </ul>
Joint meeting with GHAC, AAAC and GAAC	31 August 2022	<ul style="list-style-type: none"> <li>▪ Discussions being held with GEMCO about various options.</li> <li>▪ Considering options for reducing CAPEX by share use of GEMCO infrastructure.</li> <li>▪ Discussion laterite / gravel pits and sourcing additional material.</li> </ul>
AAAC annual general meeting with guests	30 November 2022	<ul style="list-style-type: none"> <li>▪ Overall project status report.</li> <li>▪ Winchelsea infrastructure update report.</li> <li>▪ Status at the Winchelsea Project and other activities.</li> </ul>

Beyond the Traditional Owners, consultation with various Government, community and industry stakeholders has been completed. A summary of the consultation is as follows:

- Community – The Groote Eylandt community have been regularly informed of the Project through various media and in-person formats. The ALC website maintains a ‘Major Creative Innovative Projects’ page that includes details of the Project and links to a dedicated Winchelsea Mining website. An information brochure was also issued to stakeholders providing an overview of the Project and requesting input to inform the Draft EIS. Winchelsea Mining maintains a separate website. All major initiatives of the Project are made public in the ALC Annual Reports.
- Between 16 – 18 March 2022 representatives and technical consultants held a 3-day workshop on Groote Eylandt. The workshop provided an overview of the Project to Traditional Owners and key community stakeholders, and sought input on the activities to be included, opportunities for upskilling and employment.
- AAPA – Additional cultural heritage surveys and consultation with the Traditional Owners has been completed for Winchelsea Island. The updated Cultural Heritage Report will be issued to AAPA for consideration and consultation is ongoing.
- NT EPA –consulted on several occasions to discuss the Project, interactions/interconnectedness with other ALC economic development initiatives, environmental study expectations and the environmental assessment process.
- Department of Environment, Parks and Water Security (DEPWS) (Flora and Fauna Division) – The Department have been consulted regarding the ecological survey approach.
- South32 – Representatives of South32 / GEMCO have been engaged by both ALC and its consultants. Input has been sought from South32 on the Project to address any synergies or conflicts with existing mining activities and operations.

Further consultation will be undertaken to inform and update stakeholders about the Project. Ongoing consultation will provide Project updates including milestones, the economic benefits, employment and business opportunities. The consultation will also seek to identify concerns and address these early. These will be delivered in various formats to reach a wide audience. Ongoing targeted stakeholder engagement will continue with NT Government departments; NT and Australian Government Minister; Local Government; members of the Groote Archipelago community; relevant interested organisations; and Indigenous, Groote Eylandt, NT and National media. Section 3.7- Future Engagement provides details on the proposed future engagement for the Project.

### **3.7 Future Engagement**

The following engagement program establishes the activities to be undertaken and key Project milestones. All consultation activities undertaken for the Project are provided in the register located in Appendix A.

**Table 3.7-1 Consultation Phases**

Stage	Description	Who	Activities	Progress
Pre-EIS Site Investigation and Survey Stage	<ul style="list-style-type: none"> <li>Initial regulatory engagement to outline the Project and confirm necessary inclusions in the assessment.</li> </ul>	<ul style="list-style-type: none"> <li>NT Government Agencies</li> </ul>	<ul style="list-style-type: none"> <li>Communication via email, phone, etc.</li> <li>One-on-one meetings</li> </ul>	Complete
Draft EIS Development Stage	<ul style="list-style-type: none"> <li>Activities to improve general stakeholder awareness of the Project and avenues for providing input;</li> <li>Targeted engagement and communications specific to stakeholder groups; and</li> <li>Targeted engagement and communication activities designed to gain specific feedback to inform the Draft EIS.</li> </ul>	<ul style="list-style-type: none"> <li>Indigenous Stakeholders and Traditional Owners</li> <li>NT Government Agencies</li> <li>Local and Regional Community</li> <li>Territory and Federal Politicians</li> <li>Federal Government</li> <li>Neighbouring Commercial Businesses and Local Operators</li> <li>Interest group(s)</li> </ul>	<ul style="list-style-type: none"> <li>Communication via email, phone, etc.</li> <li>On-Island Project information session</li> <li>One-on-one meetings</li> <li>Technical meetings and briefings</li> <li>Website (General)</li> <li>Media releases (General)</li> </ul>	Complete
Post-Draft EIS Stage (Supplement Stage)	<ul style="list-style-type: none"> <li>Update the Stakeholder Engagement Plan as necessary; and</li> <li>Undertake additional targeted consultation as necessary to address specific issues raised in comments on the Draft EIS.</li> </ul>	<ul style="list-style-type: none"> <li>Indigenous Stakeholders and Traditional Owners</li> <li>NT Government Agencies</li> <li>Local and Regional Community</li> <li>Territory and Federal Politicians</li> <li>Federal Government</li> <li>Neighbouring Commercial Businesses and Local Operators</li> <li>Interest group(s)</li> </ul>	<ul style="list-style-type: none"> <li>Communication via email, phone, etc.</li> <li>One-on-one meetings</li> <li>Technical meetings and briefings</li> <li>Website (General)</li> </ul>	Pending
Notification of Approval and Conditions	<ul style="list-style-type: none"> <li>Update the Stakeholder Engagement Plan as necessary;</li> <li>Undertake activities to inform stakeholders of the approval and conditions; and</li> <li>Provide information to stakeholders on the next steps and Project schedule.</li> </ul>	<ul style="list-style-type: none"> <li>Indigenous Stakeholders and Traditional Owners</li> <li>NT Government Agencies</li> <li>Local and Regional Community</li> <li>Territory and Federal Politicians</li> <li>Federal Government</li> </ul>	<ul style="list-style-type: none"> <li>Communication via email, phone, etc.</li> <li>Website (General)</li> </ul>	Pending



Stage	Description	Who	Activities	Progress
		<ul style="list-style-type: none"> <li>▪ Neighbouring Commercial Businesses and Local Operators</li> <li>▪ Interest group(s)</li> <li>▪ Local and Regional Suppliers and Business Organisations</li> <li>▪ Public</li> </ul>		
Construction Stage	<ul style="list-style-type: none"> <li>▪ Update the Stakeholder Engagement Plan as necessary;</li> <li>▪ Early notification to key potentially affected stakeholders (e.g., local community) of Project construction commencement and actions being implemented to manage risks;</li> <li>▪ Undertake stakeholder and community engagement as required to satisfy approval conditions and achieve compliance with statutory obligations for construction; and</li> <li>▪ Provide general awareness of the avenues for stakeholder complaints.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Indigenous Stakeholders and Traditional Owners</li> <li>▪ NT Government Agencies</li> <li>▪ Local and Regional Community</li> </ul>	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc.</li> <li>▪ One-on-one meetings</li> <li>▪ Website (General)</li> </ul>	Pending
Operational Stage	<ul style="list-style-type: none"> <li>▪ Update the Stakeholder Engagement Plan as necessary;</li> <li>▪ Undertake stakeholder and community engagement as required to satisfy approval conditions and achieve compliance with statutory obligations for the operation; and</li> <li>▪ Undertake activities to maintain community and stakeholder awareness regarding avenues for project information and complaints.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Indigenous Stakeholders and Traditional Owners</li> <li>▪ NT Government Agencies</li> <li>▪ Local and Regional Community</li> </ul>	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc.</li> <li>▪ One-on-one meetings</li> <li>▪ Website (General)</li> </ul>	Pending
Decommissioning	<ul style="list-style-type: none"> <li>▪ Update the Stakeholder Engagement Plan as necessary;</li> <li>▪ Notification of closure of the facility to relevant stakeholders; and</li> <li>▪ Inform local and regional community of ongoing site management following closure.</li> </ul>	<ul style="list-style-type: none"> <li>▪ Indigenous Stakeholders and Traditional Owners</li> <li>▪ NT Government Agencies</li> <li>▪ Local and Regional Community</li> </ul>	<ul style="list-style-type: none"> <li>▪ Communication via email, phone, etc.</li> <li>▪ One-on-one meetings</li> <li>▪ Website (General)</li> </ul>	Pending

## Section 15 References

### 15.1 Sections 1 to 6

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