NORTHERN TERRITORY GOVERNMENT
Department of **LANDS, PLANNING AND ENVIRONMENT**

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17 June 2026

Our Ref: DLPE2026/0167

Mr Roland Lee
Environmental Assessment Unit
Department of Lands, Planning and Environment
GPO Box 3675
DARWIN NT 0801

Dear Mr Lee

Re: Invitation to comment on referral – Finniss Lithium Project BP33 Underground Mine Proposed Variations - Lithium Development (Grants) Northern Territory Pty Ltd

The information submitted for the above project has been assessed by the relevant divisions within the department and the following comments are provided:

Mining Division

The Mining Division has reviewed the referral and provides comment in **Attachment 1.**

Environment and Heritage Division

Heritage Branch

The Heritage Branch has reviewed the referral and provides comment in **Attachment 2.**

Flora and Fauna Division

The referral includes the expansion of the BP33 underground mine and a change to the current route for hauling material to the Grants Lithium Mine. These changes pose a very low risk to threatened species and biodiversity values in the area.

Land Resources Division

Land Management Unit

The Land Management Unit considers that any additional clearing of vegetation in proximity to watercourses or sensitive environments, as well as any changes to natural surface or subsurface hydrological processes, has the potential to result in erosion and/or sedimentation. This can include the loss of vegetation as a result of modified access to groundwater or surface water, leading to reduced groundcover and subsequent potential for erosion.

These scenarios should be included in any Erosion and Sediment Control Plan (ESCP), developed by an experienced and certified practitioner, and monitored on a regular basis for suitability and effectiveness, including any modifications to the plan. Based on the size of the disturbance area, proximity of receiving environment and duration of the activity and potential

for impacts, the Land Management Unit considers that the ideal process would be to have the ESCP-along with the results of regular monitoring-endorsed by an independent auditor for the duration of the operations. This should include the current proposed activities, as all operations will be conducted as an integrated activity.

Environmental Regulation Division

The proposed activity requires an approval and/or licence under Northern Territory (NT) legislation administered by the Environment Division, including the *Water Act* 1992 the *Waste Management and Pollution and Control Act* 1998 (WMPC Act), and the *Environment Protection Act* 2019 (EP Act).

In relation to requirements for secondary approvals, existing operations at the Finniss Lithium Project BP33 Underground Mine (BP33) are undertaken in accordance with:

- Environmental approval EP2020/001-001[1]; and
- Section 45 of the *Water Act* 1992: surface water extraction licence (SWEL) 8151018[2].

The activities require the discharge of waste to water, which could potentially cause water to be polluted. Therefore, for BP33, a Waste Discharge Licence (WDL) under the *Water Act 1992* has been granted to Lithium Developments (Grants NT) Pty Ltd (the proponent). WDL253-01 was issued on 9 February 2024 and expires on 9 February 2029. It was subsequently amended on 19 March 2026. WDL253-01 can be viewed online[3]. Please refer to the Guidelines on waste discharge licensing under the Northern Territory *Water Act 1992*[4].

Linked to BP33 is the proponent's second project/mine, Grants Lithium Project/Mine (Grants). A WDL (WDL248-03) under the *Water Act* 1992 was granted to the proponent on 25 July 2022 and expires on 30 June 2030. WDL248-03 was amended on 18 July 2025 and can be viewed online[5]. Please refer to the Guidelines on waste discharge licensing under the Northern Territory *Water Act 1992*.

The proponent collects, transports, stores, recycles or treats listed wastes on a commercial or fee for service basis as part of the development or operations of the activities at both sites (BP33 and Grants). From 1 July 2024, mining projects (BP33 and Grants in this case) authorised under the *Mining Management Act* 2001 are automatically deemed to hold an environmental (mining) licence under the EP Act. This is referred to as a deemed mining licence (DML). The proponent holds two DMLs for both BP33 and Grants (DML1138-01 for BP33 and DML1021-01 for Grants).

The proponent should note that all persons are required to comply at all times with the General Environmental Duty (GED) under section 12 of the WMPC Act. To help satisfy the GED, the proponent is advised to take notice of the list of environmental considerations below. The list is not exhaustive, and the proponent is responsible for ensuring their activities do not result in non-compliance with NT laws.

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[1] https://ntepa.nt.gov.au/your-business/public-registers/environmental-impact-assessments-register/completed-assessments/register/finniss-lithium-project-bp33-underground-mine

[2] http://www.ntlis.nt.gov.au/walaps-portal/report/current/swel;jsessionid=70BC412B78AEDF11C9FB9B98E4CA6F2C

[3] https://ntepa.nt.gov.au/__data/assets/pdf_file/0005/1602176/wdl253-01-water-discharge-licence.pdf

[4] https://ntepa.nt.gov.au/__data/assets/pdf_file/0005/950603/guidelines-waste-discharge-licensing.pdf

[5] https://ntepa.nt.gov.au/_media/waste-and-pollution/register/wdl/mining/lithium-developments/wdl248-02-waste-discharge-licence.pdf

A non-exhaustive list of environmental issues that should be considered to meet requirements under NT law are listed below:

1. **Dust**: The proposed activities have the potential to generate dust, particularly during the dry season. The proponent must ensure that nuisance dust and/or nuisance airborne particles are not discharged or emitted beyond the boundaries of the premises.
2. **Noise**: The proponent is to ensure that the noise levels from the proposed premises comply with the latest version of the NT EPA Northern Territory Noise Management Framework Guideline available online[6].
3. **Erosion and Sediment Control (ESC):** The proponent must ensure that pollution and/or environmental harm do not result from soil erosion.

   ESC measures should be employed prior to and throughout the construction stage of the development. Larger projects should plan, install and maintain ESC measures in accordance with the current International Erosion and Sediment Control Association (IECA) Australia guidelines and specifications.

   Where sediment basins are required by the development, the NT EPA recommends the use of at least Type B basins, unless prevented by site specific topography or other physical constraints.

   Basic advice for small development projects is provided by the NT EPA document: Guidelines to Prevent Pollution from Building Sites[7].
4. **Storage:** If an Environment Protection Approval or Environment Protection Licence is not required, the proponent should store liquids only in secure bunded areas in accordance with VIC EPA Publication 1698: Liquid storage and handling guidelines,[8]. Where these guidelines are not relevant, the storage should be at least 110% of the total capacity of the largest vessel in the area.

   Where an Environment Protection Approval or Environment Protection Licence is required, the proponent must only accept, handle or store at the premises listed waste, including asbestos, as defined by the WMPC Act, in accordance with that authorisation.
5. **Site Contamination**: If the proposal relates to a change of land use or if the site is contaminated, including as a result from historical activities such as cyclones, a contaminated land assessment may be required in accordance with the National Environment Protection (Assessment for Site Contamination) Measure (ASC NEPM). The proponent is encouraged to refer to the information provided on the NT EPA website[9] and the NT Contaminated Land Guidelines[10].
6. **Waste Management - Import and Export of Fill**: The proposed activities have the potential to generate fill and/or involve the importation of fill for use on-site. Untested fill material may already be present on the site. All fill imported or generated and exported as part of the activity must either be certified virgin excavated natural material (VENM) or be sampled and tested in-line with the NSW EPA Guidelines[11]

   All imported fill material must be accompanied by details of its nature, origin, volume, testing and transportation details. All records must be retained and made available to authorised officers, upon request. The proponent should also consider the following NT

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[6] https://ntepa.nt.gov.au/__data/assets/pdf_file/0004/566356/noise_management_framework_guideline.pdf

[7] https://ntepa.nt.gov.au/__data/assets/pdf_file/0010/284680/guideline_prevent_pollution_building_sites.pdf

[8] https://www.epa.vic.gov.au/sites/default/files/2025-05/Liquid-storage-and-handling-guide.pdf

[9] https://ntepa.nt.gov.au/your-environment/contaminated-land

[10] https://ntepa.nt.gov.au/__data/assets/pdf_file/0020/434540/guideline_contaminated_land.pdf

[11] https://www.epa.nsw.gov.au/your-environment/waste/classifying-waste/virgin-excavated-natural-material

EPA fact sheets: How to avoid the dangers of accepting illegal fill onto your land[12] and Illegal Dumping - What You Need to Know[13].

7. **Odour or Smoke:** The proposed activities may have the potential to create odours and/or smoke. The proponent must ensure that nuisance odours or smoke are not emitted beyond the boundaries of the premises.

Water Resources Division

As no additional groundwater extraction has been requested, there are no issues of concern requiring comment within the responsibilities of the Water Resources Division associated with the proposed variations to increase the depth of the underground mine from the previously approved depth of 320m to 850m.

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

Maria Wauchope
Executive Director Land Resources

Attachment 1 – Mining Division comments
Attachment 2 – Heritage Branch comments

[12] https://ntepa.nt.gov.au/__data/assets/pdf_file/0005/285728/factsheet_avoid_danger_accepting_illegal_fill_to_your_land.pdf

[13] https://ntepa.nt.gov.au/__data/assets/pdf_file/0008/285740/factsheet_illegal_dumping_what_you_need_know.pdf

Attachment 1

Submission on the referral

Lithium Development (Grants) Northern Territory Pty Ltd – Finniss Lithium Project BP33 Underground Mine – Proposed Variations

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

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

Summary: Insufficient information is provided in the referral to robustly assess any potential impact on the identified environmental factors. The scale of these knowledge gaps, coupled with the lead time required to address them, demonstrates that a formal assessment (Supplementary Environmental Report (SER) or Environmental Impact Statement (EIS)) is warranted. Key areas of uncertainty are:

- The geochemistry of materials (waste rock, ore, and tailings) at depths below 320 metres below ground level (mbgl);
- Groundwater connectivity, yield and quality at depths below 320mbgl;
- The potential for acid and metalliferous drainage from the processing and storage of ore and waste rock;
- The balance of waste over the proposed extended mine life of 12 years, at both Grants and BP33 (waste rock, DMS rejects, slimes, undersize, fine and ultrafine rejects);
- The BP33 underground mine plan and development of WRD1 and WRD2; and
- Implications of the proposed variation regarding slimes and paste tailings on the studies provided, e.g. water balance, waste materials balance.

Section of Referral	Theme or issue	Comment
Section 9 Table 9-1 EGi, 2020 EGi, 2021 EGi, 2022 BP33 Waste Rock and AMD Management Plan	Acid and Metalliferous Drainage	"*Potential impacts related to acid mine drainage that may arise from waste rock material generated during mining of the deeper sections of BP33 mine. The risk of AMD generation through waste rock extraction, handling and storage is specifically related to 'fresh material'. The fresh material is expected to be encountered at approximately 170mbgl, and the presence of this material is consistent through to the deepest sections of the mine included in this Proposal (850mbgl). As the management controls committed in the previously approved BP33 Referral will be directly adopted during handling and storage of waste rock that contains potentially acid forming (PAF) material, no increased/ new impacts, risks or management measures were identified*." This is the only reference to acid 'mine' drainage/acid and metalliferous drainage (AMD) in the referral submission. No geochemistry data has been provided for any material below 320mbgl (the currently approved mine depth). This is a significant data gap and presents a high level of uncertainty regarding any assessment of potential impacts. No consideration is given to neutral drainage, despite the kinetic testing undertaken by EGi of oxide, transition and fresh rock finding that '***if*** *the Oxide sample used in this study reasonably represents oxide waste stored in the Box Cut WRD and*

		*subsequently backfilled into the box cut, seepage from the WRD and recharged groundwater in the backfilled box cut will maintain neutral pH together with low sulphate concentrations. Similarly, **if** the Transition and Fresh samples used in this study reasonably represent transition and fresh waste rock stored in UG WRD and subsequently backfilled into the UG mine, seepage from the WRD and groundwater in the UG mine will maintain neutral pH together with low sulphate concentrations."* (EGi, 2024).
		
		The finding is heavily caveated, likely given only one composite sample of each 'type' (i.e. oxide, transition and fresh) was tested.
		
		Leach column testing was also undertaken. EGi reported that the "*Concentrations in leachates from the Transition and Fresh waste rock leach columns were higher than for the Oxide column and significantly higher than surface water and shallow groundwater baseline water quality during unsaturated leaching. The change to leaching under saturated conditions resulted in a substantial decrease in leachate arsenic concentrations for the Fresh and Transition waste rock columns". … "These results suggest that storage of Fresh and to a lesser extent Transition waste rock in a WRD prior to back filling the mine voids and inundation, may provide a source of arsenic via seepage/runoff from the WRD which could potentially contain concentrations significantly above the baseline water quality for surface waters and shallow groundwater*". Conversely, the results of the leach column testing under saturated conditions indicated that "*backfilling of mine voids with oxide transition or fresh waste rock could potentially provide a source of zinc when saturated after groundwater recharge, which may adversely impact groundwater quality*."
		
		In summary, insufficient information and no empirical data has been provided in the referral, to show the potential for acid or metalliferous drainage from waste rock below 320mbgl. It is recommended that:
		
		• Further testing of deeper samples (>320mbgl) should be completed to substantiate the findings of the 2020, 2021 and 2022 EGi studies, and demonstrate the geochemical continuity of the metasediments at depth;
		
		• The potential for neutral drainage be assessed, and empirical data provided;
		
		• The proponent provides a detailed block model, ideally showing lithology, oxidation/weathering state, sulfur content as well as other deleterious elements (e.g. arsenic, zinc) and AMD class; and
		
		• The proponent should also consider, and provide an update on recommendations made by EGi, specifically:
		
		  ○ Qualitatively assess the risk of migration of leachable metal contaminants from the site by development of a (schematic) hydrogeological conceptual model of the waste rock dumps (WRDs) and underground mining to assess the potential pathways by which leachable metals may migrate into the water environment; and
		
		  ○ Quantitatively assess the same by implementation of components of the hydrogeological conceptual model in 2-dimensional finite element models (using Seep/W and CTran/W) to quantify the migration of soluble metal contaminants from temporary surface WRDs and from permanent underground void backfill, including dilution in groundwater due to advection and dispersion, and removal or capture from groundwater due to adsorption, reaction or decay.

	Arsenic	The leach column tests indicate that the storage of fresh, and to a lesser extent transition waste rock in a WRD may provide a source of arsenic via seepage/runoff (EGi, 2022). EGi state that it is probable the arsenic in the fresh sample is principally associated with sulphide minerals, most likely arsenic enriched pyrite. Based on the 850mbgl block model, how much arsenic enriched waste is anticipated? How will this material be identified and potential impacts to the environment managed? More information is required.
	Materials balance Waste rock	Table 7 of EGi (2021) provides the volumes and tonnages of waste rock and ore that will be moved to Life of Mine (LOM), Table 8 provides the estimated volume and tonnages of transition and fresh rock to be placed in WRD2 (for the currently approved 4-year LOM). The combined (WRD1 and WRD2) peak storage requirement is stated as approximately 570,000m^3 (by year 4). The individual WRD1 and WRD2 volumes are not provided (Section 4.3 Core Lithium, 2026). Such an estimate of transition and fresh rock volumes have not been provided for the extended 12-year LOM. The modelled waste volumes of transition and fresh rock (and AMD class) to be placed in WRD1 and WRD2, over the extended LOM should be provided, including a schedule for WRD1 and WRD2 development. Additionally, the volumes of transition and fresh rock materials likely to be used to backfill the underground voids. Table 3-1 of the referral report indicates a current WRD2 capacity of 170,000m^3 and a proposed capacity of 250,000m^3. This is consistent with the BP33 Waste Rock and AMD Management Plan (Core Lithium, 2026[14]) that also provides a maximum elevation of 12m (39mRL). The proponent must show that the BP33 WRD capacities are sufficient for the proposed 12-year LOM.
	Management of transition waste rock	EGi 2022 states that transition waste rock will be placed in both WRD1 and WRD2. The criteria for placement, however, is not provided in the referral. The BP33 Waste Rock and AMD Management Plan (Core Lithium, 2026) states that once development progresses into transition and fresh material, material will be placed in WRD2. WRD2 is required to have a low permeability foundation, a potentially acid forming (PAF) cell, and perimeter toe drain with leachate collection sumps/ponds to contain, test and manage potential leachate. There is no such requirement for WRD1. More information is required regarding how waste rock will be classified, and criteria for placement in WRD1 and WRD2. The WRD1 design should also be updated, with consideration of runoff and leachate.
	Tailings	No geochemistry data has been provided for tailings or paste tailings. Appendix B of the referral submission references a fourth EGi report: "*Environmental Geochemistry International, 2024. Geochemical Characterisation of Cemented Paste Backfill – Finnis [sic] Lithium BP33 Underground, Rev0, 22 May 2024*". This document has not been provided. The currency of this document is unknown, given the proposed change in the type of tailings used in paste fill. The reviewer also notes that EGi (2020, 2021 and 2022) assumed that tailings would be deposited in the Grants Project Tailings Storage Facility, and that waste rock alone would be backfilled.

[14] Currently under assessment by the DLPE, Mining Division.

		Insufficient information and no empirical data have been provided in the referral to characterise the geochemistry of the tailings to be produced. Geochemistry data should be provided for all BP33 Processing Plant (PP) waste streams, including slimes, undersize, fine and ultrafine rejects, and paste tailings. EGi, 2024 should be updated as required, and submitted for assessment.
	Materials balance Tailings – Grants Project	A waste materials balance has not been provided. Appendix C identifies the quantities of material required for the paste backfill. The remaining volumes of BP33 PP wastes are assumed to remain at the Grants Project for disposal. What volumes of slimes, undersize, fine and ultrafine rejects, and dense media separation (DMS) rejects will be produced over the life of mine, and disposed of to the tailing storage facility (TSF)/WRD? At what rate? The approved 4-year LOM project assumed that all slimes would be piped to BP33 for backfilling. Any balance must be updated given the advice that slimes will no longer be used in backfilled paste. What is the TSF capacity? Is there sufficient capacity for the proposed 12-year mine life? How much material will be placed in the Grants WRD? What will the dimensions/design be of the integrated landform at the extended end of mine life?
Appendix C	Paste Pre-Feasibility report	The currency of the Minefill Services, 2025 report is unclear. The report assumes that slimes, in addition to ultra fines and undersize rejects will be used in paste fill. Recent advice from the proponent, is that the pipeline and the use of slimes in paste fill is no longer required. Formal advice of this variation is pending. The report identifies the backhauling of ore and tailings. More information should be provided on material movement. How much material will be stored at the BP33 run of mine pad (RoM), oversized stockpile etc.
		As demonstrated in Appendix B, the solids content of slimes, undersized and ultrafine rejects are 35%, 95% and 97% respectively. How will the removal of slimes from the paste mix affect the water balance? How much additional water is required to prepare the paste? Where will this water be sourced from? The integrated water balance must be updated.
		Section 3.3 identifies that according to the current schedule, the total accumulated mine void volume will be 3,964,657m^3 of which approximately 82% (3,279,706m^3) will be backfilled. What of the remaining 18%? What structures will not be backfilled and why? What volume of waste rock (if any) will remain on the surface at the end of the proposed 12-year extended mine life?
		Section 8 provides recommendations in relation to groundwater monitoring. These include the drilling of an additional, 5 (maximum) nested groundwater bores. Will the recommendation be fully implemented by the proponent?
Appendix M Groundwater model update	Section 6.1 Table 6-1	The updated groundwater model was used to inform the Integrated Water Balance Assessment (WRM, 2026 – Appendix J). The updated groundwater model considered the proposed depth of 850mbgl.

		"*The groundwater flow pre-mining in the shallow groundwater zone was mainly southward… The intermediate and deep aquifer flow vectors were orientated north-west*." This is contrary to the Grants Project, where both shallow, intermediate and deep aquifer flow was towards the south-east. This phenomenon was not discussed further. Groundwater data from the Grants Open Pit (OP) and BP33 Box Cut (BC) were used to model the potential groundwater inflows and drawdown. However, the Grants OP and BP33 BC are stated as 94m and 35m deep, respectively. In contrast the proposed BP33 mine depth is 850mbgl. No empirical groundwater data has been provided or is known to exist for depths below 320mbgl. This is a significant data gap and presents a high level of uncertainty regarding inflows and the integrated water balance. Section 6.1 (Table 6-1) provides a statistical summary of simulated LOM dewatering rates for the 850mbgl BP33 mine. The <u>average</u> base and high case underground dewatering rates are provided as 1,139m^3/d and 1,359m^3/d respectively (1.14ML/d and 1.36ML/d respectively). The dewatering rates used to update the water balance, as shown in Figure 4.5 of Appendix J (WRM, 2026) are consistent with the average values (although it is not explicitly stated what the 'inflows' represent). The maximum dewatering rates for the base and high case at BP33 are shown as 1.7ML/day and 2.24ML/day respectively. These values correspond to 'Scen_1.1' and 'Scen_1.4a' respectively. Section 3.8.1 identifies Scen_1.4a as representing a high specific yield (Sy) scenario (scaled up by an order of magnitude of 10 from Scen_1.1a for all model layers). It is well documented that deeper inflows within the Burrell Creek Formation correspond to specific fractures or quartz veins. Section 2.5.6 of the report identifies "*Several mapped lineaments may represent regionally significant faults, shear zones, or fracture corridors that controlled basin development, deformation of the Finnis River Group, and subsequent mineralisation." And Section 3.8 that "Currently, there is a high degree of uncertainty with regards to the vertical hydraulic conductivity of the deeper (>150mbgl) aquifer, and it is recommended that deep packer tests be conducted at depths where mining would occur*". The <u>maximum</u>, in addition to the average, dewatering rates should be modelled in the integrated water balance (WRM, 2026), and predictions reported. Any changes in mine schedule must be incorporated into the groundwater model and integrated water balance.
Appendix N	Groundwater Model update – Independent peer review	Section 3.3: "*As shown in Figure 3-19 in the Modelling Report (Artesium, 2026) it is noted that the groundwater model extends to around -800 mamsl (metres above mean sea level) to allow it to simulate the full depth of the proposed underground mining operations at BP33. However, no hydraulic testing data are currently understood to be available below around -130 mamsl. As such the modelled rate of decline of around one order of magnitude between around -120 and -800 mamsl represents an initial assumption which although plausible hydrogeologically does not appear to be based on any field hydraulic testing since no tests have been completed below around -130 mamsl*."

		Section 3.4.2: "*As mentioned previously and noted in the Modelling Report (Artesium, 2026) in the absence of any test results below around -130 mamsl both the modelled rate of decline and absolute values of hydraulic conductivity in the deeper strata not supported by any actual data below this elevation. Similarly, the absence of deep groundwater monitoring also limits the degree to which modelled parameters in this zone can be calibrated. As such, predicted drawdowns and inflow in the deep strata would be expected to be subject to a relatively high degree of uncertainty which may be significant since the BP33 underground mine will also extend more than 700 m below the terminal depth of the existing Grants Open Pit or the BP33 Box Cut*." Further, Section 3.2 of the review notes that data are only available for a single monitoring point in the deeper, relatively fresh bedrock 'aquifer' in close proximity to the Grants OP, and that the cone of influence of dewatering operations in the deep system is not known. The independent peer review identifies a high degree of uncertainty regarding hydraulic conductivity, and therefore groundwater inflows (and dewatering rates) below the currently approved BP33 mine depth of 130mbgl. No data is presented for the deeper aquifer.
Appendix J	Integrated Water Balance Study	The currency of the WRM, 2026 report is unclear. The report assumes that 100% of the slimes/slurry produced will be transferred to the BP33 paste plant. Recent advice from the proponent, is that the pipeline and use of slimes in paste fill is no longer required. Formal advice of this variation is pending. Water balance must be updated with consideration of proposed variation.
		WRM uses two key contaminants - Total Nitrogen (TN) and Total Phosphorus (TP) at Grants and BP33 respectively as factors limiting discharge. Table 4.6 identifies the adopted TN and TP concentrations as 0.1m/L and 0.37mg/L respectively. These values are identified as being "*Adopted from the Grants WMP*". Modelled controlled releases under respective WDLs are based on these assumptions. The data to support the use of TN and TP, respectively is not provided. Further, Table 4.6 indicates only data from the Grants Project was used (OP depth of 94m). The proponent must demonstrate consideration of all potential limiting factors, applicable to the proposed depth of 850mbgl. The target dilution, required to meet WDL conditions at BP33 are 1:50 to 1:90 for the base case, and 1:50 to 1:100 for Scenario 2 (High groundwater inflows). The proponent must demonstrate that sufficient flow is afforded in the Charlotte River to accommodate this ratio.
	MWD capacity	The proponent has advised that the footprint of the BP33 BC will need to increase to allow for an adjustment of the batter angle along the eastern wall, adjacent to MWD Cell 2. Consequently, the access road will be moved to within the dam footprint, and the Mine Water Dam (MWD) Cell 2 storage capacity will be reduced. Has this been considered in the updated Integrated Water Balance Study?
General	Geotechnical considerations	No assessment is provided of the geotechnical characteristics of the host rocks for the underground workings to 850mbgl.

		What geotechnical studies including modelling have been undertaken to 850mbgl with respect to rock strength/ competence, fault interaction, stress regimes, or the potential for geotechnical controls on groundwater impacting operations? The proponent should provide and discuss the findings.
General Proposed activities	WRD2 and overflow stockpile	Section 2.2 of the referral report indicates an increase in size at ground level of WRD2 to allow for encapsulation of any PAF encountered during mining, and in addition a third sediment basin. Additional activities include the construction of an overflow stockpile allowing for handling of ore and/or materials for paste backfill production, installation of a cooling plant, pipeline and paste plant. More information is required on the location and size of WRD2 and any sediment basin, and overflow stockpile. The latter with consideration of the current mine plan.
	Water cooling tower	Section 3.4 of the referral report advises the closed water circuit (30,000L) will be initially supplied by Observation Hill Dam within the confines of the related surface water extraction licence. In contradiction, Table 4.2 of WRM, 2026 assumes that water will be supplied by treated mine-affected water from the MWD cells. Clarity is needed on the cooling tower water supply, and water quality requirements for use underground. The water balance (WRM, 2026) must also be consistent regarding the initial source and on-going supply.
	Cement	No information is provided on the paste plant concrete requirements. How will concrete be prepared, what reagents and volumes will be stored at BP33? Where, and what management measures will be implemented?
Appendix O	Mine affected water ultra-trace analyse	The data presented in Appendix O is limited to selenium and mercury, organophosphorus pesticides. Three samples from the Grants MWD1 C3 were collected for analysis in February and March 2026. Appendix O is referenced in Section 13.1 of the referral report in relation to inland water environmental quality. To assess the potential for any impact(s) to inland water quality, a comprehensive set of water quality data should be provided with interpretation. Except for this data set, no groundwater quality data has been provided. This is a significant data gap. No site-specific empirical water quality data is provided. The quality of groundwater in the deeper aquifer is understood on a regional scale only.

Attachment 2

Submission on the referral

Lithium Development (Grants) Northern Territory Pty Ltd – Finniss Lithium Project BP33 Underground Mine – Proposed Variations

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

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

Section of Referral	Theme or issue	Comment
Referral Report & Contextual Summary Report (Appendix B)	General	The extent of pre-existing disturbance and the nature of the work itself has been considered. To ensure the proponent meets their obligations under the *Heritage Act 2011*, an Unexpected Finds Protocol and suitable induction materials should be developed for the project. This includes the requirement that if archaeological places are discovered over the course of the work, establish an exclusion zone around the site and contact the Heritage Branch immediately. The Heritage Branch can provide a template on request.