

Submission on draft Environmental Impact Assessment (EIS) – published 2 February 2024

Winchelsea Mining Pty Ltd – Winchelsea (Akwamburrkba) Island Manganese Mine Project

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

NT EPA reference number: EP 2021/004

Government authority: Department of Industry Tourism and Trade (DITT)

Summary: DITT has reviewed the draft Environmental Impact Statement (EIS) for the Winchelsea (Akwamburrkba) Manganese Mine Project and provides the following comments:

- The proposed disposal of potentially saline pit water to bushland is not supported under the *Mining Management Act 2001* (MMA) and the Operator should provide a contingency for the management of pit water for this case.
- The Tailing Storage Facility (TSF) may not have sufficient storage capacity for the waste tailings generated by the project and the Operator should be required to demonstrate the suitability of the proposed design.
- While the TSF does not meet the size requirements to be considered a large dam under the Australian National Committee on Large Dams (ANCOLD) guidelines, the Department will require that it be designed and operated as such due to the hazards associated with TSF structures.
- The marine infrastructure as proposed, occurs outside of the mineral lease and are therefore not administered under the MMA. Consequently, the department has no comments regarding these aspects.

Section of referral or terms of reference	Theme / issue	Comment
Draft EIS – Winchelsea (Akwamburrkba) Manganese Mine – Water Theme Chapters & Draft EIS – Winchelsea (Akwamburrkba) Manganese Mine – Appendix Q (Winchelsea groundwater model report)	Pit dewatering and discharge to bushland	<p>The Project proposes that excess water obtained from the dewatering of pits be disposed of by discharging to bushland.</p> <p>As pit MMZ is understood to have a maximum depth below sea level with significant groundwater inflows reported for this period (323ML/year as per the water theme chapters and 1,220ML/year per Appendix Q) there is a potential that pit water, at some stage of the mine life, will be saline due to salt water intrusion and be of inadequate quality for discharge to bushland.</p> <p>In this case, disposal of saline pit water to bushland is unlikely to be supported/approved under the MMA.</p> <p>Winchelsea Mining should provide a contingency plan for the management of excess saline if discharge to bushland is not approved under the MMA.</p>
Draft EIS – Winchelsea (Akwamburrkba) Manganese Mine – Chapter Four – Project Description	Tailings Storage Facility (TSF) capacity and mining volumes	<p>The Tailings Storage Facility (TSF), intended for the first 5 years of tailings storage, is located externally to any of the proposed pits (ex-pit) with a design storage volume of approximately “460,000 m³ (460ML)”, with 1,527,363 bulk cubic meters (bcm) or 1527ML of waste tailings estimated to be produced over the same time (From Table 4.4-2 Production Schedule of Mining).</p>

		<p>Winchelsea Mining should be required to demonstrate that sufficient storage capacity for tailings material is available for the Project.</p> <p>Furthermore, whilst the Proponent indicates that the ex-pit TSF does not meet the size threshold to be considered a large dam, Mining Operations considers a TSF to be a major hazard facility that must be designed and operated according stringent engineering specifications. Accordingly under the MMA, Australian National Committee on Large Dams (ANCOLD) guidelines will be applied including independent expert review for design, construction and review of an Operation, Maintenance and Surveillance (OMS) Manual.</p>
<p>Draft EIS – Winchelsea (Akwamburrkba) Manganese Mine – Chapter Four – Project Description</p>	<p>Departmental jurisdiction and marine activities</p>	<p>The wharf extension, barge loading facility, marine dredging, dredged material marine disposal area, and establishment of barge mooring and transshipment areas occur outside of the mineral lease and are therefore not administered under the <i>Mining Management Act 2001</i>. Consequently, the department has no comments regarding these aspects.</p>