

Submission on the draft EIS

Primary Gold Pty Ltd – Rustlers Roost and Quest 29 Open-cut Mine Redevelopment

This submission is made under Regulation 134 of the Environment Protection Regulations 2020

NT EPA reference number: EP 2021/005

Government authority: Aboriginal Areas Protection Authority (the Authority / AAPA)

Section of draft EIS	Theme or issue	Comment
2.2.5	NT legislation	<p>This section correctly addresses the <i>Northern Territory Aboriginal Sacred Sites Act 1989</i> and states that Primary Gold's existing Authority Certificate C2016/168 is for mineral exploration.</p> <p>While no sacred sites are recorded in the area covered by C2016/168, the Authority does have records of sacred sites in the vicinity of the proposal. The Authority will consider potential impacts of the proposal on these sites during the processing of Primary Gold's application for a new Authority Certificate (reference 202113141). This application addresses the proposed mining activities outlined in the draft EIS.</p>
7.6	Community & economy	<p>Section 7.6.3 and table 7-76 list the mechanism for avoiding impacts to cultural heritage values in relation to sacred sites as 'survey over the Project area with the AAPA'. The Authority notes that the survey itself is not sufficient for avoiding impact. Rather, impacts to sacred sites will be avoided by obtaining and complying with a valid Authority Certificate for the proposed works. As noted above, Primary Gold has applied for an Authority Certificate for the proposed works.</p>