

2023

# Stakeholder Communication and Consultation Plan



## Document Details

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## 1. PURPOSE

This Management Plan outlines how Stakeholder Consultation is to be managed at the Browns Oxide Project (the project). Due to the current direction of the company, Northern Territories Resources Pty Ltd (NTR) has already initiated consultation with many of their stakeholders. This will continue in the coming 12 months.

## 2. DEFINITIONS

Word or acronym	Definition or full name
AAPA	Aboriginal Areas Protection Authority
Cultural Heritage	Cultural heritage is the legacy of physical artefacts and intangible attributes of a group or society that are inherited from past generations, maintained in the present and bestowed for the benefit of future generations.
Heritage	Heritage is that which is inherited from past generations, maintained in the present, and bestowed to future generations.
Natural heritage	Natural heritage refers to the sum total of the elements of biodiversity, including flora and fauna and ecosystem types, together with associated geological structures and formations.
Stakeholder	A person or group with an interest or concern in something.
WDL	Waste Discharge Licence

## 3. LEGISLATION

Legislation and other guidelines relevant to stakeholder consultation management in the NT include the following:

### 3.1 Commonwealth

Legislation	Description
<i>Aboriginal and Torres Strait Islander Heritage Protection Act 1984</i>	This Act makes provision for the preservation and protection from injury or desecration of areas and objects in Australia and in Australian waters, being areas and objects that are of particular significance to Aboriginal people in accordance with Aboriginal tradition.
<i>Environment Protection and Biodiversity Conservation Act 1999</i>	Under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)</i> , any development requires assessment if it has the potential to affect one or more of eight Matters of National Environmental Significance (MNES). The MNES include: <ul style="list-style-type: none"><li>• World Heritage properties;</li><li>• National Heritage places;</li><li>• Wetlands of international importance (listed under the Ramsar Convention);</li></ul>

Legislation	Description
	<ul style="list-style-type: none"> <li>Listed threatened species and ecological communities;</li> <li>Migratory species protected under international agreements;</li> <li>Commonwealth marine areas;</li> <li>The Great Barrier Reef Marine Park; and</li> <li>Nuclear actions (including uranium mines).</li> </ul> <p>The environment under the <i>EPBC Act</i> includes:</p> <ul style="list-style-type: none"> <li>Ecosystems and their constituents;</li> <li>Natural and physical resources;</li> <li>Qualities and characteristics of locations, places and areas;</li> <li>Heritage values of places; and</li> <li>Social, economic and cultural aspects.</li> </ul>
<i>Environment and Heritage Legislation Amendment Act (No 1) 2003</i>	Protects heritage sites and materials at a national level. This Act was added to the <i>EPBC Act</i> to regulate the actions that are taken on Commonwealth land, that are likely to have an impact on Commonwealth land or that are taken by the Australian federal government or its agencies.

## 3.2 Northern Territory Legislation

Legislation	Description
<i>Heritage Conservation Act 1991</i>	<p>The Act is quite broad in its scope, and protects both natural and cultural heritage. The Heritage Act commenced on 1 October 2012. It replaced the old <i>Heritage Conservation Act</i>, which had been in operation since 1991. The Act:</p> <ul style="list-style-type: none"> <li>Establishes the Heritage Council (consisting of eleven members);</li> <li>Establishes the NT Heritage Register;</li> <li>Sets the process by which places become heritage places;</li> <li>Allows for interim protection of places;</li> <li>Sets out the process for getting permission to do work to heritage places; and</li> <li>Allows for fines and imprisonment for offences against the Act.</li> </ul>
<i>Northern Territory Aboriginal Sacred Sites Act 1989</i>	The <i>Northern Territory Aboriginal Sacred Sites Act 1989</i> is administered by the Aboriginal Areas Protection Authority (AAPA). The Act provides for the location, recognition, description and protection of sacred sites under Aboriginal tradition. All sacred sites (even if not registered) are protected under the Act and it is an offence to enter or carry out work on a sacred site without permission or a certificate issued by the AAPA. The certificate sets out conditions under which the work may be carried out.

### 3.3 Other Resources

Resource	Description
Enduring Value - Framework for Sustainable Development; <i>The Australian Minerals Industry 2015 Edition</i>	<p>The Enduring Value framework drives continuous improvement of the industry's performance on the social, safety and environmental aspects of its activities in three ways:</p> <ul style="list-style-type: none"> <li>• It is a condition of membership of the MCA that companies accept the principles of Enduring Value</li> <li>• It assists the industry to operate in a manner that is attuned to the expectations of the community and which seeks to maximise the long-term benefits to society that can be achieved through the effective management of Australia's natural resources</li> <li>• It provides practical guidance to companies on how to translate the ten principles of Enduring Value into practices that support their sustainable development goals.</li> </ul>
Strategic Framework for Mine Closure <i>ANZMEC 2000</i>	It is designed to provide a broadly consistent framework for mine closure across the various Australian jurisdictions. In particular it addresses Stakeholder Involvement in the closure planning process.

## 4. MANAGEMENT COMMITMENTS

This management plan addresses the following recommendations and commitments detailed in Appendix 1 of the Browns Oxide Project Assessment Report 52 (EPA, 2006):

Commitment Number	Commitment Details
AR26	The Radiation Management Plan is available for public comment and any monitoring results from the radiation monitoring program are publicly available
AR29	A Biological and Land Management Plan and Weed Management Plan incorporating recommendations to mitigate fauna impacts made in Appendix 4, PER and this Assessment Report must be prepared in consultation with relevant stakeholders for approval prior to commencement of works.
AR51	The mine closure plan will be refined as inputs from detailed project design, stakeholder consultation on end land uses and completion criteria, and investigations/studies become available
AR59	The results of monitoring must be made publicly available and should be reviewed in the annual mine plan review, for appropriate action, including continuation, cessation or modification of the program
AR60	NTR to develop the Cultural Heritage Management Plan in consultation with relevant stakeholders, traditional owners and the Northern Land Council.

Commitment Number	Commitment Details
AR62	Community consultation regarding the project and any future plans by NTR needs to remain open and transparent so that all stakeholders are informed during operation and post closure. The social monitoring program will be reviewed after 12 months of data have been obtained.
AR71	Prepare a detailed Hazardous Materials and Waste Management Plan in consultation with key Stakeholders, as part of the Mining Management Plan

## 5. BACKGROUND

### 5.1 Existing Environment

The Browns Oxide Project is located approximately 7km northwest of the Batchelor township. Mining of copper, cobalt and nickel oxide ore began at the mine in 2008 and a hydrometallurgical plant was built on site to process the oxide resources. A combination of processing and economic issues forced the operation to close and revert to a care and maintenance mode in early 2009. NTR have purchased all the assets and the site will remain in care and maintenance while feasibility studies are conducted.

## 6. RESPONSIBILITY

The table below lists the roles and responsibilities as it relates to this Stakeholder Consultation Management Plan.

*Table 6-1 – Roles and Responsibilities*

Role/Title	Responsibilities
Director	<ul style="list-style-type: none"> <li>• Authorise this plan and oversees project compliance.</li> <li>• Ensures there are appropriate management systems in place throughout the project to minimise the risks to the environment.</li> <li>• Engage with stakeholder groups.</li> <li>• Determines the position(s) responsible for stakeholder consultation management within the business.</li> <li>• Ensures that employees comply with the requirements of this procedure.</li> <li>• Liaises with the Environmental Compliance Manager regarding appropriate management controls.</li> </ul>
Environmental Compliance Manager	<ul style="list-style-type: none"> <li>• Liaises with the relevant sections of the relevant NT Government agency responsible for environmental issues as required.</li> <li>• Review this Stakeholder Consultation Management Plan annually or as required.</li> </ul>
General Manager	<ul style="list-style-type: none"> <li>• Ensure all employees comply with the instructions contained within this procedure.</li> <li>• Brings issues to the attention of the Environmental Compliance Manager or Director.</li> </ul>



Role/Title	Responsibilities
NTR employees and contractors	<ul style="list-style-type: none"> <li>Comply with the requirements of this management plan.</li> <li>Participate in operational and strategic stakeholder engagement activities where required.</li> <li>Report any incidents where cultural heritage values may be compromised.</li> </ul>

## 7. RISK ASSESSMENT

The key activities and potential environmental impacts identified for stakeholder consultation are listed in table below. The risk matrix is located in Appendix A.

*Table 7-1 – Risk Assessment*

Activity	Potential Impact	Residual Risk
Environmental incident or non-compliance	An incident or non-compliance has potential to raise concerns about the company's ability to manage environmental risks.	Low
Insufficient stakeholder engagement at the appropriate time of project planning	Delays in project approval. Negative media coverage.	Low

## 8. OBJECTIVES AND TARGETS

The objective of this Management Plan is to provide a framework which ensures stakeholders are provided with accurate information about the Browns Operation where appropriate. Specific aims of ongoing consultation are detailed in the table below:

*Table 8-1 – Objectives and Targets*

Objectives	Targets	Indicators
Ensure that the stakeholders are well informed about the project.	All reasonable steps made to engage with stakeholders.	Number of stakeholder that participate in information sessions.
Enable interested parties to assess economic and commercial opportunities that arise as a result of the project development.	Ongoing engagement with potential investors where appropriate.	Investor engagement activity.
Identify areas of concern for stakeholders, and mitigate concerns with regular communication and updates.	Establish a forum for stakeholders to communicate their concerns directly to the company.	The number of forums developed within the reporting period.
Ensure that the necessary regulatory requirements are met.	No non-compliances with legislation.	Number of non-compliances or incidents.

Objectives	Targets	Indicators
Generate a framework for ongoing consultation through project implementation and closure	Establish framework within the next twelve months.	Completion and implementation of the framework.

## 9. RISK MITIGATION

### 9.1 Stakeholder Engagement Strategy

Consultation with stakeholders is ongoing and will continue through the life of the project. A stakeholder engagement strategy has been developed, as outlined in Table 9-1 below. NTR have a phone number where members of the public can register a complaint or enquiry. This number is +61 437 690 958. This number is provided on the WDL sign at the front gate of the site as shown below.



### 9.2 Waste Discharge Licence (WDL177-10)

Item 4 of the Waste Discharge Licence (WDL177-10) is to prepare a communications plan. This was completed in 2015, however, it is the intent of NTR to incorporate the existing WDL Communication Plan together with this Stakeholder Consultation Management Plan.

#### 9.2.1 WDL Communication Objectives

The objectives for the WDL Communication strategy includes the following.

- Inform the community of the conditions of the waste discharge licence.

- Ensure the community perceives NTR as transparent and accountable in its environmental management procedures.
- Give the community confidence that NTR is adequately protecting the environment.
- Protect NTR's reputation for responsive and professional environmental management procedures.

*Table 9-1 – Stakeholder Engagement Strategy*

Stakeholder/ Organisation	Engagement Strategy	Target Audience for WDL communication
NT Ministry	One on one meeting if required. Phone calls, meetings or email as appropriate.	
Leader of the Opposition	One on one meeting if required. Phone calls, meetings or email as appropriate.	
Member for Daly	Invitation to site. Personal briefing on project. Phone calls, meetings or email as appropriate.	Yes
Cross benches	Invitation to site. Personal briefing on project. Phone calls, meetings or email as appropriate.	

Stakeholder/ Organisation	Engagement Strategy	Target Audience for WDL communication
<b>Dept of Mines and Energy</b>	Regular meetings as the project scope develops. Invitations to site. Phone calls, meetings or email as appropriate.	Yes
<b>NT Environment Protection Agency</b>	Regular meetings as the project scope develops. Invitations to site. Phone calls, meetings or email as appropriate.	Yes
<b>Coomalie Community Government Council</b>	Informal meetings to provide project updates where appropriate as project plans are updated.	Yes
<b>Traditional Owners /NLC</b>	Project updates where appropriate as project plans are updated. Phone calls, meetings or email as appropriate.	
<b>Workforce</b>	Regular meetings as the project develops.	Yes
<b>Rum Jungle Group</b>	Phone calls, meetings or email as appropriate.	Yes
<b>NT Minerals Council</b>	Invitation when we have an open day.	
<b>Media</b>	Selective briefings.	
<b>Local community</b>	Examples of engagement include - Informal briefings, community bulletins, Coomalie Community Government Council's meetings,	Yes
<b>Nearby Residents</b>	Informal briefings, face to face communication, fact sheet, stakeholder meetings, letter to residents	Yes
<b>Local Schools</b>	Informal briefings.	

### 9.2.2 *Water Management - Trigger Action Response Plan*

A Trigger Action and Response Plan (TARP) has been developed for the management of discharge of water quality that has the potential to adversely impact water quality at Site 5. Below illustrates the communication responses to each specific action level for both surface water and groundwater. Further details are located the Browns Oxide Water Management Plan.

Table 9-2 – Surface Water Exceedance Responses

Action Level	Water Quality Trigger Values Site 5 - SSTVs as per current WDL	Corrective Action	Internal Reporting Requirements	External Reporting Requirements
0	SSTVs and WDL Trigger Values are met at Site 5	Continue to manage by routine procedures Manage at team level	No action required	No action required
1	Exceedances of Trigger Values or SSTV at Site 5 following WDL requirements: On three consecutive occasions; Or A single occasion where the parameter measures greater than or equal to two times the Trigger Value	Record exceedance and assign severity classification as per Section 29 ( <i>Mining Act</i> ) Internal response required to assess active discharges. Manage through routine procedures. Investigation following ANZECC (2000) procedures if severity warrants as per Water Act Section 29.	Report to Compliance Manager and Site Manager	Formal notification to EPA as per WDL. Notification to DME under Section 29 if required.
2	Exceedances of ALL Trigger Values and SSTVs at Site 5 where the parameter measures greater than or equal to three times the Trigger Value or SSTV	Record exceedance and assign severity classification as per Section 29 ( <i>Mining Act</i> ) Internal response required to assess active discharges. Manage through pumping from the Sediment Dam to the Water Treatment Plant for treatment: or Pump to the Open Pit for storage until treatment	Report to Compliance Manager and Site Manager	Formal notification to EPA as per WDL. Notification to DME under Section 29 if required.
3	Outside ANZECC Stock Water Guidelines (SWG) at Site 5. Unauthorised discharge, loss of previously contained waste water. Poor management of discharge. Non-compliance with WDL with potential or actual environmental harm or pollution.	Immediately cease active wastewater discharge. Resample within 24 hours of receipt of laboratory report to confirm result Required to rectify within compliance ASAP. Investigate source of toxicants following ANZECC (2000) procedures Internal response required to	Report to Compliance Manager, General Manager and Director	Notify and report within 24 hours as an incident to EPA and DME. Following WDL and DME Section 29 requirements

### 9.2.2.1 Controlled Discharge (Siphon)

Following the discharge, NTR will provide the NT EPA with a monthly discharge report within 10 days of the start of the next month. The discharge summary will include a summary of the discharge and tabulated results.

### 9.2.2.2 Emergency Overflows

Emergency overflows from stormwater infrastructure will be assessed on a case by case basis to determine if formal notifications to the DME and NT EPA are required. In general, if there is a discharge of contained/managed water from the Project (i.e. collapse of flood levees or overflow of stormwater infrastructure) the DME and NT EPA will be notified. A summary of the notification requirements is provided in Table 9-4.

Table 9-3 – Formal Notification Requirements

Entity	Trigger	Timeframe and Contact Details	Incident Reporting Details
Department of Mines and Energy (DME)	Incident which causes minor environmental impact with some minor actual or potential harm to the environment.	As soon as practicable. <a href="mailto:Mineral.Info@nt.gov.au">Mineral.Info@nt.gov.au</a>	<p>The Section 29 Notification of Environmental Incident Form requires the following details:</p> <ul style="list-style-type: none"> <li>• Site and operator details.</li> <li>• Location occurred and area impacted (GPS coordinates);</li> <li>• Date and time;</li> <li>• Description of incident</li> <li>• Emergency and remedial actions taken.</li> <li>• Nature of impact and severity;</li> <li>• Current situation;</li> <li>• Details of sampling undertaken; and</li> <li>• Notification status internally and externally.</li> </ul> <p>A blank form is available as follows: <a href="http://www.nt.gov.au/d/Minerals_Energy/Content/File/Forms_Guidelines/CF7-001%20Notification%20of%20an%20Environmental%20Incident.docx">http://www.nt.gov.au/d/Minerals_Energy/Content/File/Forms_Guidelines/CF7-001%20Notification%20of%20an%20Environmental%20Incident.docx</a></p>
Northern Territory Environment Protection Authority (NT EPA)	Incident which causes, or is threatening or may threaten to cause pollution resulting in material environmental harm or serious harm.	< 24 hrs post incident <a href="mailto:nTEPA@nt.gov.au">nTEPA@nt.gov.au</a> <a href="mailto:pollution@nt.gov.au">pollution@nt.gov.au</a>	<p>The Section 14 Incident Report Form requires the following details:</p> <ul style="list-style-type: none"> <li>• Incident causing or threatening to cause pollution;</li> <li>• Location occurred and area impacted;</li> <li>• Date and time;</li> <li>• How the pollution has occurred, is occurring or may occur;</li> <li>• Attempts made to prevent, reduce, control, rectify, investigation and/or clean up the pollution or resultant environmental harm caused or threatening to be caused by the incident; and</li> <li>• Operator details.</li> </ul>

Entity	Trigger	Timeframe and Contact Details	Incident Reporting Details
			A blank form is available as follows: <a href="#">Notification of an incident   NTEPA</a>

### 9.3 Internal Procedures

NTR has developed a procedure for managing community feedback. If faced with a query (phone, email, letter or face-to-face), NTR staff are required to complete the Community Feedback Form (COP-ENV-PRC-001), and submit it to the Director or delegate. The Director or delegate will record the query and take further action as required.

### 9.4 Training and Awareness

All relevant employees will be trained in the Community Liaison procedure.

## 10. AUDITS AND INSPECTIONS

Internal audits and inspections will evaluate compliance with this management plan. All findings from these audits and inspections will be used to inform the review of this management plan and associated procedures, with a focus on continual improvement.

## 11. TRIGGER ACTION RESPONSE PLANS

The table below details the trigger action response plan for Stakeholder Communications as it relates to the level of risk.

*Table 11-1 – Trigger Action Response Plan*

Event Level	Trigger	Action	Responsibility
Low - Med	Complaints from local community.	<ul style="list-style-type: none"> <li>Address the complaint and implement appropriate action.</li> <li>Feedback to the community as soon as practicable.</li> </ul>	Director and Environmental Compliance Manager
Moderate - High	Negative media coverage at a territory level.	<ul style="list-style-type: none"> <li>Address the complaint and implement appropriate actions.</li> </ul>	Director
Very High - Extreme	National or Global negative media coverage due to environmental incident or non-compliance	<ul style="list-style-type: none"> <li>Media Release as appropriate.</li> <li>Report to relevant government agencies.</li> </ul>	Director

## 12. NON-CONFORMANCE / NON-COMPLIANCE

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### 12.1 Non-conformance

Non-conformances with this management plan or associated procedures will be reported (and investigated if required) in accordance with the Environmental Event Reporting and Investigation Procedure.

### 12.2 Non-compliance

Non-compliance with legislation will be reported immediately to the responsible government department including the DME as per Environmental Reporting and Investigation Procedure.

## 13. REVIEW

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This document will be reviewed annually and any time there may be a change to the project activities that will instigate a change in stakeholder engagement strategies.

## 14. RELATED DOCUMENTS

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Document Reference	Document Name
NTR-ENV-PRC-002	Community Feedback Procedure
NTR-ENV-FRM-001	Community Feedback Form
NTR-ENV-MP-006	Cultural Heritage Management Plan
NTR-ENV-PRO-009	Audit and Inspection Procedure
NTR-ENV-PRO-006	Environmental Event Reporting and Investigation Procedure



## Appendix A – Risk Matrix

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RISK MATRIX						Likelihood					
Consequence	Injury / Disease to Personnel	Environmental Impact	Damage to Assets and Resources	Production Loss	Damage to Reputation	Not known to occur in the global industry	Known to occur in the global industry but is unlikely	Has occurred in industry and may to occur at some time	Expected to occur at some time in this operation	Expected to occur frequently in this operation	
						Rare	Unlikely	Possible	Likely	Frequent	
	Fatality or multiple disabling injuries or illness (permanent damage)	Massive effect; long term (1 year or more) environmental damage requiring \$2m to correct or in penalties	Extensive damage, large financial loss - \$10m	Long term interruption – 3 months total production loss	Negative press in international media	Critical	M11	M16	H20	E23	E25
	Permanent injury or illness or serious LTI	Major effect; medium term (1 month) environmental damage requiring \$0.5m to correct or in penalties	Major damage, major financial loss - \$1m	Significant interruption – 1 week day total production loss	Considerable negative impact; state wide media coverage for 1 week	Major	M7	M12	H17	H21	E24
	Lost time injury or illness (non-permanent damage)	Localized effect; short term environmental damage requiring \$50k to correct or in penalties	Localized damage, moderate financial loss - \$100k	Minor interruption – half a day total production loss	Limited impact; negative local media coverage for a few days	Moderate	L4	M8	M13	H18	H22
	Medical treatment injury or illness	Slight effect; minor environmental damage requiring \$5k to correct or in penalties	Slight damage, minor financial loss - \$10k	Short interruption- 1 hour total production loss	Slight impact; negative site wide publicity	Minor	L2	L5	M9	M14	H19
Minor injury or illness, first aid	Minimal on site effect	Minimal financial loss - \$1k	Minimal impact	Minimal informal impact contained within the site	Low	L1	L3	L6	M10	M15	

**Legend**

	Low Risk		Moderate Risk		High Risk		Extreme Risk
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