

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: Department of Health – Health Protection – Environmental Health Strategy

Section of Referral	Theme or issue	Comment
Executive Summary	Proximity to populated areas	- Finniss Lithium Project BP33 Underground Mine ('BP33') is located on the Cox Peninsula, approximately 33 km west of the Berry Springs townsite and 18km southeast of Belyuen community. Mining activities and infrastructure are located approximately 25 km due south of Darwin (approximately 90 km by road) at two adjacent mine sites, Grants Lithium Project ('Grants') and BP33. - The area lies on Crown land zoned Rural, is largely surrounded by undeveloped native vegetation, and has no nearby residences, industries, significant conservation areas, or Aboriginal Sacred Sites within the project footprint. - Given the proximity to populated areas and transport corridors it could be recommended that a complaints process is instigated.
Executive Summary: proposed location 2.4 Regional and local context	Drinking water	- The proposal states that land surrounding BP33 is zoned as rural and there are no nearby residences, farms or industries within the catchment areas upstream or downstream, and no commercial or domestic uses for which surface water or groundwater is currently being extracted anywhere near the project area. - The proposal also states that both Grants and BP33 operations, prior to the recent period of care and maintenance, indicated no significant contamination of soil, surface water and/ or groundwater has occurred. - Multiple groundwater studies and modelling updates have been completed with an independent peer review by AGE assessing the reliability of the models used to predict groundwater impacts during operations and closure.
Table -2 Summary of potential impacts on Environmental Factors due to the Proposal	Air Quality	- The identified 3.5km corridor between BP33 and Grants processing plant where air pollution may occur due to transport of rejects by truck. - The submission highlights that transport and stockpiling of rejects will employ: - Dust management / suppression practices implemented for stockpiled rejects informed by a dust extinction moisture analysis, - Covered haulage of rejects between mine sites. - It was identified the management practices should mitigate impact to surrounding residences (10+kms away)
Table 8-3 NT EPA Factors which were excluded from further assessment	Human Health	The referral report states, "The Proposal does not use or emit dangerous or hazardous materials or activities." We have no reason to believe that this statement is not correct and have addressed any main concerns in the sections above.

