

Submission on the draft Environmental Impact Statement

Winchelsea Mining Pty Ltd – Winchelsea Island Manganese Mine Project

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

NT EPA reference number: EP 2021/004

Government authority: Department of the Chief Minister and Cabinet

Summary:

Section of Referral	Theme or issue	Comment
Chapter 3 Stakeholder engagement and consultation; and Appendix A – Stakeholder Management Plan	People - Community and Economy Issue - Stakeholder engagement and consultation	<p>The Terms of Reference (ToR) outlines the requirement for an assessment of the impacts and benefits of the proposal on the community; and for the assessment to be informed by an inclusive and collaborative community and stakeholder engagement and consultation process that is iterative throughout the preparation of the EIS.</p> <p>Broad social licence for the project is evidenced through linkages to the ALC's <i>Future Groote Strategy (2012-27)</i> and related <i>Invested in Our Future</i> plan and the Groote Eylandt Local Decision Making Agreement.</p> <p>The EIS identifies consultation activities undertaken since July 2022, including with Traditional Owners through the proponent's board; and consultation with the Anindilyakwa Land Council (ALC), a key stakeholder and representative of the 14 clans of the Groote Island archipelago. The EIS provides a summary of key issues raised by the proponent's board members and addresses responses to these concerns.</p> <p>The EIS stakeholder consultation and engagement plan, including the record of engagement activity would benefit from greater detail on the specific reach of consultation and engagement with stakeholders, including TO's, Groote Eylandt community members and stakeholders to assist in determining the level of inclusive and effective engagement as required in the ToR.</p> <p>Recommendation: Assessment of the effectiveness of consultation would be supported by including further details as part of the reporting of stakeholder engagement, consistent with the NT EPA, Stakeholder Engagement and Consultation - Environmental impact assessment guidance for proponents. Additional information to be included in the EIS to support assessment can include:</p> <ul style="list-style-type: none"> evidence of the material presented to stakeholders for review of accessibility and inclusion of potential impacts and mitigation measures summary of stakeholder and engagement methods and activities to include who attended, what was discussed and what were the results a description of how engagement methods were adapted to be culturally appropriate, in line with section 43(b) of the EP Act; and details of ongoing stakeholder engagement processes and mechanisms for stakeholders to address any emerging issues. Acknowledging the EIS identifies a commitment to ongoing monitoring of community concerns. This would be supported by further details of the plan for ongoing engagement with governance groups and the broader community.

		<p>A review is also required of stakeholder messaging detailed in the stakeholder holder management plan to ensure consistency with the current project and the EIS (Appendixes A, 2.4).</p>
<p>Chapter Four Project Description – section 4.4.14</p>	<p>- People - Community and Economy Issue – employment & local economic impact</p>	<p>The ToR requires the EIS to include strategies and measures to address workforce management (including how the local Aboriginal employment target will be met) and to promote procurements from local business and industry. The draft EIS includes an intention to develop Clan Based Enterprises (p 891) and a measure ‘to work with local training providers to develop local training programs to provide unskilled people with opportunities to gain employment’ (p 898). The information provided however requires further detail to provide for a confident assessment of the level of positive impact. CMC also recognises the local Aboriginal employment target has been reduced from 50% to 20% of the workforce (i.e. to around 18 jobs assuming an operational workforce of 88 FTE).</p> <p>Recommendation: CM&C recommend the EIS includes further information on 1) how the local Aboriginal employment target will be met, and 2) how the identified opportunities for Clan Based Enterprises will be progressed. Information provided could include for example specific training programs, local procurement policies and other supports to be provided.</p>
<p>Chapter 4 Project Description – section 4.4.1.4.2</p>	<p>People - Community and Economy – Issue Social Impact</p>	<p>The ToR requires the EIS to describe potential benefits to, and significant impacts on, the community and the economy.</p> <p>Accommodation and transportation requirements for the construction and operational phases of the Project are understood to be dependent on a separate development managed and owned by Groote Holdings Aboriginal Corporation (GHAC), the Little Paradise Development (LPD). The EIS identifies Little Paradise as the potential site for the Project’s worker accommodation and the planned marina facility will be used for the transport of workforce and equipment for the operational period of the Project. As a result of the dependency of the Project on the LPD for enabling infrastructure and to support identification/mitigation of any potential social impacts, further details are required to assess components of the LPD related to the Project.</p> <p>Recommendation: Assessment of the social impacts of the Project, inclusive of components to be provided through the LPD, to be supported by inclusion of:</p> <ul style="list-style-type: none"> • additional information on any linkages and dependencies between the Project and the LPD. • a detailed profile of the Little Paradise satellite community to support an impact assessment. • details of any direct impact, if identified, on the Little Paradise satellite community. • details of consultation that has been undertaken with the Little Paradise satellite community residents or users. <p>Further information is also required on the usage of the Bartalumba Bay wharf in the construction phase of the project, including circumstances where it may be used, quantum of usage both currently and proposed and assessment of potential impact on current users. It is noted that stakeholders impacted by usage includes clan groups who have been engaged through the project’s stakeholder consultation, however it is unclear if other affected users have been consulted.</p>

