

## APPENDIX 2: Summary of Comments

Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
1	a	DHCS-MEB	Erosion prevention structures should be constructed at the overflow points from the various pits and dams within the development site, to prevent erosion and the downstream siltation of drainage paths, which could lead to the creation of mosquito breeding.	4.6.4	Surface Water
1	b	DHCS-MEB	Erosion prevention structures should be constructed at any erosion vulnerable points within the diverted water courses, to prevent erosion and the downstream siltation of water courses, which could lead to the creation of mosquito breeding.	4.6.5	Surface Water
1	c	DHCS-MEB	There are two minor errors in this table. Peak abundance for <i>Ochlerotatus normanensis</i> should be changed to January to April, and Peak Abundance for <i>Ochlerotatus vigilax</i> should be changed to September to January.	7.6	Biting Insects
1	d	DHCS-MEB	The MEB guideline 'Guidelines for preventing mosquito breeding sites associated with mining sites' is applicable to this development. Relevant information from this guideline should be incorporated into the Management and Mitigation Measures for the mine site, to ensure no new mosquito breeding sites are created. The proponent should consult this guideline during the design stage of the mine.	8.15.2	Biting Insects
2	a	DHCS - EH	What is the estimated life of mining operations? Is it likely to extend beyond 3 years?	4.4.1	Mining Operation
2	b	DHCS - EH	The proponent should seek advice from a qualified hydraulic consultant about the most suitable wastewater disposal system for the mines' mobile crib unit and ablution unit. Reliability and low maintenance costs of remote on-site wastewater disposal systems should not be underestimated. The project is located outside a Building Control area.	4.9.1	Infrastructure
2	c	DHCS - EH	<p>The design of septic tank systems is detailed in the Northern Territory <i>Code of Practice for Small On-site Sewage and Sullage Treatment Systems and the Disposal or Reuse of Sewage Effluent</i> (The Code). The Code was gazetted on the 11 November 1998 and is called up in Regulations 28-28B of the <i>Public Health (General Sanitation, Mosquito Prevention, Rat Exclusion and Prevention) Regulations</i>.</p> <p>DHCS administers the provisions of the <i>Public Health Act &amp; Regulations</i> with respect to the:</p> <ul style="list-style-type: none"> <li>· type approval of septic tanks and associated products.</li> <li>· notification to install an Alternative Septic Tank System for a single residential dwelling.</li> <li>· conventional septic tanks located outside Building Control Areas.</li> <li>· site-specific design approval of an Alternative Septic Tank System.</li> </ul> <p><b>Conventional Septic Tanks</b> (e.g. septic tank reticulating to absorption trenches or evapo-transpiration bed) must be installed by licensed plumbers and drainers outside Building Control Areas. <b>Alternative Septic Tank Systems</b> (ASTS) are septic tank systems that treat effluent to a higher quality than that offered by conventional septic tank system. For example, these include Aerated Wastewater Treatment Systems (AWTS), Composting Toilets, Hybrid Systems and Ecomax Systems. In addition to the self-certification of the installation, ASTS require either a notification to install or site specific design approval. Septic Tank application forms can be downloaded online or by contacting the relevant Environmental Health Office.</p>	4.9.1	Infrastructure

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2	d	DHCS - EH	<p>The <i>Radiation Protection Act 2004</i> applies to servicing, testing, installing, decommissioning, manufacturing, possessing, using, storing, transporting, disposing of or otherwise dealing with a radiation source. A radiation source is defined in the Act. The provisions of the Radiation Protection Act may apply to this project if the operation includes the use of radiation sources. The Act covers safe control of the use of all radiation sources, both ionising and non-ionising from all radiation sources. The source can be radiation apparatus or radioactive material. Natural sources of radiation may be included in the definition if radiation exposure results from the enterprise. Generally, unmodified concentrations of radioactive material in most raw materials are not included unless there is a possibility of significant radiation exposure. If the unmodified concentration is below concentrations of radioactivity as listed in the latest edition of the National Directory for Radiation Protection, that material is not defined as radioactive.</p> <p>Notwithstanding, the <i>Radiation Protection Act 2004</i> is not expected to apply to any mining operation in which the most exposed person could not receive a radiation dose that is greater than 1mSv per year.</p>	8.9	Radiation
2	e	DHCS - EH	It is stated that the potential social and economic impacts include increased local employment in the Pine Creek area. What employment strategies will the proponent use to engage local aboriginal people in the project workforce?	8.13.3	Social Impact
2	f	DHCS - EH	It is also stated that there will be increased pressure on Pine Creek medical services. It is strongly recommended that the proponent discuss this issue with DHCS Remote Health Services.	8.13.3	Social Impact
2	g	DHCS - EH	It is stated that most of the workforce (total 73 – refer 4.12) already live in the region and therefore it is assumed that many of these people will need to reside in Pine Creek. What investigations has the proponent made to ensure that there is sufficient accommodation in Pine Creek for the workforce considering that there are 2 other mines planned in the district? It is expected that the workforce will stay long-term at a caravan park or motel in Pine Creek?	8.13.3	Social Impact
3	a	AAPA	The <i>Northern Territory Aboriginal Sacred Sites Act 1989 (NTASSA)</i> is the full title.	3.2	Cultural Heritage
3	b	AAPA	The railway siding has associations with the Wagiman group.	N/A	Cultural Heritage
3	c	AAPA	It is noted that an AAPA Authority Certificate has been applied for and conditions attached to the Authority Certificate will be kept.	7.2	Cultural Heritage
3	d	AAPA	Custodians have indicated that they still carry out Indigenous land use activities such as hunting and resource collection in the region, as well as the recreational activities of camping and swimming.	8.12.2	Cultural Heritage
3	e	AAPA	The Management and Mitigation measures listed at 8.12.1 could be expanded into a detailed Cultural Heritage Management Plan (CHMP) which would become part of the Environmental Management Plan (EMP).	8.12.2	Cultural Heritage
4	a	NT Police	Construction and operation of the mine should have minimal impact on social issues in the township of Pine Creek.	8.13	Social Impact
4	b	NT Police	There is little likelihood of human remains being unearthed during construction or operation, however if this were to occur it is requested that Police at Pine Creek are notified as a priority to ensure all protocols are adhered to.	N/A	Cultural Heritage
4	c	NT Police	There will be minimal impact on traffic.	8.11	Social Impact
4	d	NT Police	There are likely to be employment benefits for the Pine Creek district as a result of the project.	8.13	Social Impact

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5	a	NRETA	There is no consideration of the significance of considerable changes to local landforms that are proposed for the project area in Section 7.1.	7.1	Landforms and Soil
5	b	NRETA	There is no mention of implications of the substantial open-cut pits that will remain at completion of the project.	8.1	Mining Development
5	c	NRETA	Further discussion on soil rehabilitation and re-vegetation measures need to be outlined further in the PER and detailed in the Rehabilitation Plan of the EMP.	8.1.2/8.5.2	Rehabilitation
5	d	NRETA	As a consequence of groundwater inflows into Helene 6/7 pit, dewatering is required to continue operations below the level of the water table. Water is proposed to be removed and used for dust suppression. It is proposed that overflow from the main dam in the wet season be diverted into Frances Creek during "natural occasions of high stream flow" (section 3.7.2) after dilution and settling. Similarly, excess water is propose to released from the Ochre Hill pit into Maude Creek during "natural stream flow to ensure adequate dilution" (section 3.7.2). There is no reference made to determining or monitoring dewatering discharge sites for exacerbated erosion. This needs to be outlined further in the PER and detailed in the Water Management Plan and Rehabilitation Plan of the EMP.	4.6	Groundwater
5	e	NRETA	Operations are expected to produce over 3 million tons of waste rock each year of which approximately 10% will be returned to the pits. Overburden and the bulk of the waste rock is proposed to be stockpiled next to the pits. It is assumed that overburden (which is proposed to be used in progressive rehabilitation) is to be stockpiled separately.	4.4.5	Waste Rock Management
5	f	NRETA	It is proposed that waste rock stockpiles from the Helene 6/7 and Thelma Rosemary pits be used to "partially fill minor valleys with ephemeral water courses" thus diverting minor water courses around piles (section 3.3.7). It is also proposed to "build diversion drains wherever stockpile construction obstructs significant watercourses" (8.2.2c Table 4 section 13). These proposals should be rejected particularly if riparian vegetation is also destroyed by such operations.	4.6, 8.2	Waste Rock Management
5	g	NRETA	The proposal appears in consistent with section 3.1.8 which states that "where practicable, stockpile locations will be selected such that they do not cross drainage lines.	4.1	Waste Rock Management
5	h	NRETA	The proposal is also inconsistent with the analysis of the regional conservation value of vegetation of the project area which recognises the regional value of riparian values. (in terms of species diversity and its role as a refuge habitat) and recommends that there should be no disturbance to this habitat (Appendix 7B Section 7.1).	6.6, Appendix 7	Vegetation
5	i	NRETA	It is also proposed that the waste rock stockpiles from the Jasmine East pit are used to fill a number of small steep-sided valleys and it is noted that this operation will not require the diversion of any watercourses (section 3.7.3). Destroying microhabitats is obviously far from a best-practice measure and would tend to further simplify rather than maintain habitat heterogeneity in the project area.	4.6.5	Waste Rock Management
5	j	NRETA	The claim is made elsewhere that "long term change to the landscape will be minimal" (section 7.1 but dumping waste rock in existing gullies (with or without watercourses) is plainly inconsistent with this aim.	7.1	Waste Rock Management
5	k	NRETA	There should be an explicit statement as to weather ten waste rock samples from six pit locations are adequate to safely establish their acid forming potential and potential for trace-element pollution of groundwater (section 5.3).	6.2.1	Waste Rock Management

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5	l	NRETA	Though there are additional details of vegetation in the appended fauna/flora survey results, there is no meaningful discussion of anticipated impacts on particular vegetation types in the body of the PER.	8.5.3	Vegetation
5	m	NRETA	The project involves clearing 172ha. (185.35 / 196.5ha. – Draft EMP) of native vegetation. Apart from the threatened <i>Cycas armstrongii</i> , no other plant species of conservation concern are recognised (Section 5.7).	5.7	Vegetation
5	n	NRETA	The draft EMP appended to the PER also indicates and undisclosed (but "small") area of riparian vegetation and swamp is to be destroyed but there are no further details.	8.5.1	Vegetation
5	o	NRETA	An adequate appraisal of the impacts of loss of vegetation presented for further consideration.	8.5.1	Vegetation
5	p	NRETA	The only specific reference to vegetation re-establishment is "to reduce loss of biodiversity". No where is it identified whether the waste rock dumps will have similar characteristics to endemic soils/micro geography or the characteristics will typically support the local vegetation and a local species suite will be used to revegetate the site.	8.5.1, 10.3	Vegetation
5	q	NRETA	The seasonal aridity of the project area suggests that the seasonal and semi-permanent natural waterholes recognised as occurring in the project area may be important to local wildlife but these areas also receive little consideration.	8.6	Fauna
5	r	NRETA	The appended flora/fauna report also recognises the value of the rehabilitated tailings storage facility that has become a "well-utilised wetland environment for "for a diverse selection" of wildlife. Though artificial in its origins (as will most of the resulting rehabilitated habitat), the existence of a functioning wetland system can be regarded as a positive offset to other environment disturbances in the area. This area should not be disturbed beyond any approved works that would enhance its further rehabilitation and function as a wetland refuge.	8.5, 8.6	Fauna
5	s	NRETA	There should be no disturbance of roosting ghost bats in the area or destruction of roost sites natural or artificial (8.6.2.f table 4 section 13) without further investigation of the significance of the roost and identification of other suitable roosts in the area.	8.6.2/8.6.3.2	Fauna
6	a	DPIFM	If the expectation is that access to the Frances Creek Dam should be limited or excluded during operations, this should be outlined. Closure of access may impact on community expectations.	2.4	Social Impact
6	b	DPIFM	"Limited potential exists to place waste rock as backfill in pits. This will be done when economically feasible i.e. without double handling". This can be interpreted as meaning that there will not be any backfilling, given that double handling of the waste rock is inevitable.	4.4.5	Waste Rock Management
6	c	DPIFM	Given the location and proximity to a landfill at Pine Creek, and commercial operators in Darwin, it may be advantageous to dispose of industrial waste off site. This reduces or eliminates the requirement for on site storage, is cost effective from a company perspective and deals with long term site contamination and legacy issues.	4.9.6	Waste Management
6	d	DPIFM	Under SSAN guidelines a security plan from explosives is also required.	4.1	Rehabilitation
6	e	DPIFM	Large amounts of carbonaceous footwall material appear to have impeded rehabilitation in the past. How will rehabilitation be managed differently if a similar deposit is unearthed?	4.4.5/ 6.2.1.1	Rehabilitation
6	f	DPIFM	This project does not constitute value adding as that term would apply to processing or refining the iron, not export of unrefined bulk materials.	5.21	Project Development
6	g	DPIFM	If the intent of this section is to require an assessment of the liabilities of premature closure, the proponent should specify the maximum expected environmental impact of a premature closure.	5.22	Closure
6	h	DPIFM	A discussion as to what alternatives were considered should be included.	5.24	Project Development

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6	i	DPIFM	A pH of less than 5 should be considered problematic and worthy of appropriate management strategies. The proponent should provide a prediction of the volume of T2 waste, and whether it is likely that other pits will encounter this material.	6.2.1.1 / Table 10	Waste Rock Management
6	j	DPIFM	Any material likely to add to AMD problems in the smallest positive increment should be identified and managed. If the conversion factor for S means that the MPA for a 0.1% S is actually 3.2, where does -0.8 come from? Any S above 0.02% in these poorly buffered materials will be generally acid forming. Regarding the comments in 8.2.1 - this has implications for surface stockpiles above 0.1%S as well. Any material above 0.02% in poorly buffered materials should be encapsulated.	6.2.1.1 / Table 10	Waste Rock Management
6	k	DPIFM	All pits except Thelma 2 appear benign in water chemistry. If mining is to be advanced in Thelma 2 (or close by but intersecting the same problematic ore), it may be necessary to treat or isolate this water and also present strategies for mining and waste encapsulation of new waste to ensure further contamination does not occur. Pit water at pH 3.5 containing dissolved metals is not easy to dispose of even under a WDL. Depending on quantity, either isolation or dilution may be appropriate solutions.	6.2.1.1	Surface Water
6	l	DPIFM	Ongoing testing of waste rock should be committed to - inference that successive wet seasons will flush the leachate away and sufficiently dilute the problem is an inadequate response to what could be a significant problem.	6.2.1.2	Waste Rock Management
6	m	DPIFM	Without a processes for containment of ARD material and an appropriate void management strategy it is likely that exposed S will produced long term water quality conditions outside of the accepted range. This is an important point given the effects of this material mentioned above on water quality aspects of the Thelma Pit.	6.4.2.1	Waste Rock Management
6	n	DPIFM	If the containment dams (Helene 9, Helene 11 dam, Main Dam) overflow on an annual basis as a consequence of water management on site, it may be necessary to establish stable overflow structures such as spillways or weirs to reduce the chance of erosion and wall collapse. The main dam is already showing evidence of substantial erosion and potential failure from the wet season of 2005/06.	6.5.2	Surface Water
6	o	DPIFM	The Schultz <i>et al</i> (2002 ) report is a useful document to characterise regional chemistry and mineralogy, however, it should be used with caution for the following reasons: 1. All metal concentrations were total measurements and thus overestimate the bio-available component (especially when comparing with the ANZECC guideline values). 2. The sites used to calculate the ranges, percentiles and other descriptive statistics included some test sites downstream of known mining contamination sources. The true ranges of background metal concentrations are therefore much lower when these sites are removed from the analyses.  Comparisons with the Schultz <i>et al</i> (2002) document will lead to misinterpretation of the Frances Creek metal concentrations from a regional perspective. Further comparison between ranges presented in this document and ANZECC (2000) Guidelines is also flawed as a result of the inclusion of test sites in the analyses.	6.5.3	Surface Water

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6	p	DPIFM	Some of the chemistry presented in table 15 and also Table 2 of Appendix 4 is wrong. The excessively high Aluminium (filtrate) concentrations reported for Helene 9 and 11 dams have been inadvertently pasted as a microgram value into an mg/L column and therefore are <u>1000 times greater</u> than the true values. It would appear two separate data sets have been combined without checking the units or fractions. The original analyses for samples collected on the 15 <sup>th</sup> , 20 <sup>th</sup> and 21 <sup>st</sup> of May 2005 and submitted to NTEL need to be reviewed and compared with data presented in Appendix 4 Table 2.	6.5.4	Surface Water
6	q	DPIFM	To further support this it would be practically impossible to get a sample with a dissolved Aluminium concentration of 21,800 with an EC of only 26 µS/cm as shown for Helene 9 Dam (app 4, Table 2).	6.5.4	Surface Water
6	r	DPIFM	Further independent sampling from DPIFM conducted in may 2006 resulted in filtered Aluminium concentrations of 77µg/L, 8µg/L and 18µg/L for Helene 9, Helene 11 and Main dam respectively.	6.5.4	Surface Water
6	s	DPIFM	There are serious implications for water management if the chemistry is not reviewed. It is definitely in Territory Iron's best interest to establish what the true chemistry results are so appropriate decisions can be made about the environmental implications of uncontrolled flows from containment ponds. This may also influence the WDL conditions as set by DNRETA.	6.5.4	Surface Water
6	t	DPIFM	The proponent should indicate why the value of 0.1%S has been selected as the trigger. It is possible that the low pH and higher metal values in pit waters are not entirely due to organic acids. More work needs to be done in this area. 0.1% sulphur, waste rock with pH of 4.9 and no buffering capacity create conditions that have the potential to cause problems.	8.2.1	Waste Rock Management
6	u	DPIFM	The view that "no rock types will require special handling" is debatable.	8.2.2	Waste Rock Management
6	v	DPIFM	A geotechnical review should be provided particularly from the perspective of erosion, given that 18 degrees is quite steep.	8.2.2	Waste Rock Management
6	w	DPIFM	Further determination is required as to whether or not material has acid generation potential. Given that water quality at the point of emission (i.e. at dump toes, pit overflows and the like) is the required compliance point, individual point sources must be acceptable for closure even if overall management is acceptable.	8.2.3, 8.4.2, 8.4.6	Waste Rock Management
6	x	DPIFM	Onsite monitoring programs should be determined with assistance and advice from DPIFM to ensure appropriate rigour is applied to the sampling methods and site selections. DPIFM will also be doing independent checks and monitoring that should complement existing programs. Adequate monitoring and control measures will ensure protection of downstream ecosystems.	8.4.5	Surface Water
6	y	DPIFM	It would be best practice to apply seed at time of initial rehabilitation.	10.2.4	Rehabilitation
7	a	DBERD - EDD	The department has no issues of concern in relation to the PER. The Proponent has effectively addressed the guidelines in relation to identification and management of the project's potential economic impacts.	N/A	Economic Impact
8	a	NLC	Nearby watercourses represent the receiving environment for any potentially harmful wastes, including any acid mine drainage, that may emanate from the mine.	6.5.2, 8.4.2, 8.4.3	Surface Water

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8	b	NLC	<p>Territory Iron has provided estimated annual water balances for the period 2006 – 2009 (Section 4.6.3). The mean rainfall values provided in Table 7 for 2007 and 2008 are significantly higher (by ~28%) than for both 2006 and 2009. This is problematic and confusing because the rationale for this increase in rainfall over a two year period only has not been explained and because the average runoff estimated for the same period has not increased to reflect this additional rainfall. Any calculations based on the data provided for this period may therefore be in error.</p> <p>While the mine's location is such that water management may not be a major issue during its short life span, any fundamental errors in water balances or failure to account for significant changes to local climate may have disastrous environmental consequences. Contingencies have not been proposed for extreme weather events. Determination of annual water balances based upon a range of, for example, <math>\pm 33\%</math> of the mean rainfall may also be of assistance in determining contingencies for dealing with any on-going water management problems during operations at the site.</p>	4.6.3	Surface Water
8	c	NLC	<p>It is commendable that Territory Iron has committed to monitoring upstream and downstream of all mining activities within the tenements, including stockpiling at the railway siding (Section 8.4.5). They plan to utilize ANZECC guidelines as values against which deterioration of water quality can be measured, but do not indicate which guidelines or values are to be used. These should be specified.</p>	8.4.5	Surface Water
8	d	NLC	<p>Territory Iron provides only limited water quality data for Frances Creek, its tributaries and Maude Creek tributaries (Table 15 – Section 6.5). A large number of samples analysed are shown to be characterized by enhanced concentrations of a number of elements, some of which exceed the ANZECC freshwater guideline values. For example, Territory Iron states that aluminium concentrations are well in excess of the ANZECC default value, but within the range observed for the natural watercourses in the project area (Table 27 – Section 8.4.3).</p> <p>The NLC believes that it would be unsuitable to utilise these values as background values or as trigger values for monitoring purposes because the catchment areas have been affected by prior mining operations. Pre-mining analytical data for the river systems and tributaries should be available from previous mining companies and it is this data that should be used for development of any triggers for use in monitoring programmes. This data has not been provided and there is no evidence that it has been sought.</p> <p>Triggers developed using this data should be verified against calculations using data collected at upstream monitoring sites, and the triggers and parent data should be made available for public review and included in the terms of the NRETA issued water discharge license.</p> <p>All triggers to be used for water quality monitoring should be site specific and derived using an ecotoxicological approach, rather than using default values (ANZECC, 2000). These, or appropriate interim trigger values should be in place prior to commencement of mining operations. If interim trigger values are to be used to allow mining to commence, then final values should be derived within the following 18 – 24 months. The NLC believes this to represent best practice and recognizes it as the preferred approach to using triggers for water monitoring in the Northern Territory.</p>	6.5, 8.4	Surface Water

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8	e	NLC	Cumulative effects from previous mining activities and from other planned developments (e.g. the gold mining at Maude Creek) have not been considered during development of the PER. While the proposed project may be environmentally acceptable as a stand-alone venture, soluble metal and sediment loads may not be acceptable if other mines come into operation in the region. This is a real concern as gold-mining at Maude Creek (the catchment of which is expected to be affected by the Frances Creek project) is expected to recommence during 2006 or 2007. Soluble metal loads for Maude Creek and allowances should be made for potential effects of other mining ventures when trigger values for watercourses are proposed.	N/A	Cumulative Impacts
8	f	NLC	Another area of concern to the NLC is Territory Iron's proposed plan to deal with management of fauna, especially those that have been classified as threatened, endangered or rare under the EPBC Act, TPWC Act and IUCN. Territory Iron has indicated that specific management measures will be implemented for a number of fauna species (Section 8.6.2). Detail of these specific management measures is largely missing and detailed comment is therefore impossible.	8.6	Fauna
8	g	NLC	Claims that the old conveyor tunnel would not be the only likely roost site for a Ghost Bat colony are unsubstantiated, and some verification of this should be provided before their habitat is disturbed. In the event that other roost sites are not found, construction of an artificial roost would be mandatory.	6.7, 8.6	Fauna
8	h	NLC	The NLC would also be interested in understanding more clearly how fauna management and monitoring plans for the following species are to be implemented, as there is no information or risk assessment provided by Territory Iron with respect to these species. (1) Orange Horseshoe Bat (2) Arnhem Sheathtail Bat (3) Partridge Pigeon (5) Western Chestnut mouse and (6) Calaby's Pebble-mound mouse. Although these species are recognized by Territory Iron (Section 8.6.1) as having conservation significance, and are likely to be impacted by mining operations, no management plans have been proposed. Particular attention should be given to the Calaby's Pebble-mound mouse and its specific habitat requirements, given its 'threatened' status in the Northern Territory and 'rare' IUCN status.	8.6	Fauna
8	i	NLC	The new draft threatened species list for the Northern Territory was released for public comment during August 2006. Although this post-dates Territory Iron's PER, the final updated list, expected by December 2006, should be used as the basis for the Environmental Management Plan when it is drafted. This should ensure that all species of conservation significance within the project area have been identified and that appropriate management measures have been accordingly developed and implemented.	8.6, EMP	Fauna
8	j	NLC	The NLC commends Territory Iron's commitment to participate in the Federal Government's Greenhouse Gas Challenge Plus Program and to report emissions as part of the National Pollutant Inventory. The NLC believes that this data should be reported in a manner that provides for greatest transparency and analysis and should therefore be reported on a facility level rather than a company-wide level. An assessment of how the company's Greenhouse Gas (GHG) emissions compare with other major industries and the Northern Territory's overall emissions would also be useful.	8.7	Greenhouse Gasses



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8	k	NLC	Territory Iron suggests that the full amount of GHG emissions from vegetation clearing will be balanced by carbon uptake during revegetation (Section 8.7.1.1), but do not indicate if this is a firm commitment under the program, nor how it will be assessed. If this is actually a commitment then that should be specified, along with an indication of how this will be measured and assessed.	8.7	Greenhouse Gasses
8	l	NLC	In general, the NLC is of the opinion that Section 10 contains insufficient detail to allow fully informed comment.	10	Rehabilitation
8	m	NLC	Territory Iron has indicated that rehabilitation will proceed in accordance with an approved Mine Management Plan. These plans are not generally made available to the public and stakeholders will have no opportunity to access the content of either the original or updated versions of the plan. Such plans should be made in conjunction with principal stakeholders.	10.2	Rehabilitation
8	n	NLC	It is recognised that rehabilitation and closure will be a dynamic process, however the information provided in the PER is insufficient to allow third parties to comment on the adequacy or success of rehabilitation and closure commitments. Areas of particular concern include: (1) Lack of any specific plans for rehabilitation or future protection of habitat requirements for species of conservation significance. Consideration should be given during the rehabilitation phase to creating localized habitats that could serve to bolster populations of endangered species (e.g. Gouldian Finch grass habitat) – provided they are consistent with the pre-existing vegetation patterns. (2) Lack of detail with respect to proposed annual monitoring programmes. These programmes appear to have been designed only to consider the vegetation. Annual monitoring of fauna species (especially those of conservation significance) should be included. (3) Lack of specific information with respect to indigenous plant species to be used in rehabilitation. Territory Iron has made no commitment to recreating vegetation patterns that are similar to those in existence prior to operations and there is a risk that species planted supplementary to natural seeding may not be endemic to the region. (4) Lack of any specific plans to deal with weeds during rehabilitation and closure at the site. It is recognized that a number of weed species already exist on the site; however both Territory Iron and the Northern Territory Government should consider the rehabilitation and closure plans offered by Territory Iron as opportunities to also address existing weed problems.	10.2	Rehabilitation
8	o	NLC	It is preferable that all open pits are backfilled because generation of acidic waters in mine pits represents an intergenerational legacy that may result in long-term impacts upon groundwater and eventually surface water systems running into the Mary River. Territory Iron's plan to allow the pits to flood with water creates a risk of acid generation similar to that already observed in Thelma 2 Pit (refer Section 6.2.1.1) if sufficient evaporation occurs.	6.2.1.1, 8.1.3, 8.2.1, 10.2.1	Closure
8	p	NLC	The NLC is not convinced that decayed organic material has contributed significantly to the high acid concentration seen in the Thelma 2 Pit only. Humic and fulvic acids are weak acids and unlikely to produce a strong acid solution even after years of cyclic evaporation and dilution. If it was a major contributing factor, then it is reasonable to assume that similar pH values would also be observed in the other pits, which does not happen. It is more likely that localized areas of pyritic or another acid forming mineral has been exposed within Thelma 2 Pit and that has contributed to the high acid values. If this is the case, then there is a high risk that further cutbacks of existing pits, or creation of new pits, may lead to other pits becoming sources of acidic wastewater.	6.2.1.1, 10.3	

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8	p	NLC	Irrespective of the source of this acidity, and in the event that pits are allowed to flood, post-rehabilitation monitoring must also include surface and groundwater monitoring with contingencies proposed for dealing with potential AMD. Territory Iron has made no commitment to this, even though the risk of the Thelma 2 Pit becoming a long-term source of AMD has been recognized in the executive summary of the hydrology study (AGT, 2006a).	6.2.1.1, 10.3	Closure
8	q	NLC	Territory Iron indicates that the Thelma Rosemary waste rock stockpile has been positioned to bury the existing Thelma 2 waste rock stockpile (Section 4.4.5). Back-filling the Rosemary and, in particular, the Thelma 2 Pit with this material to mitigate the risk of acid mine drainage seems to represent a better long-term rehabilitation strategy than increasing the size of an existing stockpile that is already difficult to rehabilitate.	4.4.5	Rehabilitation
8	r	NLC	Territory Iron has provided no detail with respect to its Closure Plan, but has indicated that it will be prepared and reviewed every three years. Review should be done in conjunction with all principal stakeholders to ensure that satisfactory closure criteria are developed and that closure is a success.	10.3	Closure
8	s	NLC	The NLC believes that the draft EMP is lacking in detail and does not meet all of the requirements stipulated in the EPA PER Guidelines (2006), particularly in terms of performance indicators and targets. It is noted that no measurable targets or performance indicators have been set, by which all anticipated and potential impacts can be measured and assessed. In accordance with the PER guidelines, these need to be provided for in the draft EMP and comply with applicable legislation, regulations, standards and codes of practice. With regard to developing targets and performance indicators for surface water management, reference should be made to the NLC's comments on the preferred and best practice approach to developing and using triggers for water monitoring in the NT.	12.1	EMP
8	t	NLC	The NLC believes that targets and performance indicators are integral components of an EMP as they provide a measurable benchmark against performance and a basis for future targets and improvements.	12.1 iv	EMP
8	u	NLC	The EMP should also provide greater detail on the environmental management structure of both the operational and construction phases of the project, and delineate between construction and operational impacts and management measures.	12.2.2	EMP
8	v	NLC	The Northern Land Council can offer only qualified support for this project as it is currently proposed. For the NLC to have full confidence in the project, it is recommended that Territory Iron:	N/A	N/A
			1. Review its water balances and water management programme to ensure that contingencies are presented to allow for positive or negative shifts in rainfall and for potential cumulative effects from other nearby mining ventures. The scope extent and frequency of the monitoring component of this programme should also be provided for stakeholder review;	4.6.3	Surface Water
			2. Specify and develop watercourse trigger values that are based on appropriate ecotoxicological testing as well as ANZECC guidelines. Development of triggers should be done in conjunction with stakeholders;	6.5, 8.4	Surface Water
			3. Develop additional management plans to deal with habitat destruction and reconstruction for the listed species identified earlier in this submission;	8.6	Fauna
			4. Produce closure criteria and additional rehabilitation monitoring programmes that provide a wider range of information against which those closure criteria may be cross-referenced;	12.7	Rehabilitation/EMP

Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
			5. Back-fill Thelma Pit 2 with waste rock from the Thelma Rosemary Pit and cap it to prevent future acid mine drainage problems. In the event that this is not feasible, an assessment of the reasons why it is not feasible should be provided; and	4.4.5	Closure
			6. Develop performance indicators and targets for inclusion into the Environmental Management Plan.	N/A	EMP
9	a	DPI	The Department is supportive of proposed route 1 (former rail spur line) outlined at section 4.7.2.1 of the PER as the preferred haulage route. This option keeps the proposed haulage mainly off public roads and separates haulage traffic from general traffic (except at one point which can be managed appropriately).	4.7.2.1, 8.11.2	Transport
9	b	DPI	If the use of non-standard vehicles is proposed for route 1, a permit will be required for crossing the public road. If route 2 is selected, the use of non-standard vehicles will not be permitted.	4.7.2	Transport
9	c	DPI	Proposed route 1 includes a proposal to construct on the alignment of the previous Frances Creek mine rail spur to Rooney Siding through Mary River West Pastoral Lease. This area of land is owned by the NT Land Corporation and may be subject to a remnant land claim under the Aboriginal Land Rights (NT) Act 1976. Further advice should be sought from the Northern Land Council and the Land Administration Division of this Department regarding negotiating appropriate ownership / use agreements.	4.7.2	Transport
9	d	DPI	Commitment 8.11.2b regarding maintenance on Mt Wells Road is noted and further consultation by the proponent will be required with this Department and the relevant local Council regarding maintenance to appropriate standards.	8.11.2b	Transport
9	e	DPI	Any construction work on roads under the care and control of this Department will require a Traffic Management Plan for construction activities prior to commencement of works.	8.11	Transport
10	a	EPA	Further information is needed regarding borrow material requirements, extraction methods and uses. In particular, the location where material will be sourced and what remediation (if any) will be undertaken on the borrow pits.	4.1	Mining Development
10	b	EPA	Details of drilling and blasting have been provided on page 20 of the PER, however the guidelines also requested information on the frequency of these operational procedures.	4.4	Mining Operation
10	c	EPA	It has been estimated that the existing ore reserves will allow the mine to operate for a period of 3 years (page 13). The future of the mine is briefly mentioned on page 40 of the PER. Please elaborate on the possible future extension to the mine operation, and discuss the probability of mining satellite ore bodies.	4.2	Mining Development
10	d	EPA	It has been stated that disturbance to riparian vegetation and the swamp (that has developed at the old TSF) will occur as a result of building waste rock stockpiles. Both these habitats are sensitive to disturbance and it should be a consideration of the proponent to avoid impacts by relocating/redesigning the proposed stockpile sites and providing a suitable buffer to protect these habitats from mining influences. Creek line vegetation serves to maintain bank stability and preserve water quality. It has also been recommended by Low Ecological Services (Appendix 7), that the TSF is a good quality wetland and management efforts to retain this quality should be adopted.	8.5, 8.6	Waste Rock Management

Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
10	e	EPA	Draw down curves of ground water may be affected by mining activities. This may result in changes to the available soil water to vegetation. Irrigation could be used to supplement vegetation water needs (in particular creek line vegetation) and contribute to a reduction and re-use of the volume of water requiring disposal from the site. As stated in the PER there will be an increase in discharges from the Helene 11 Dam to Frances Creek Main Dam from a pre-mining average of 550 megalitres a year up to 882 megalitres a year (pg 26).	8.3, 8.4	Groundwater
10	f	EPA	Discuss mass loading and the potential of cumulative impacts at a catchment based scale in relation to other major catchment industry such as the Union Reef processing plant by Burnside operations and the Mt Porter Gold Project.	8.4	Surface Water
10	g	EPA	As the project area is located on a pastoral lease (Ban Ban Springs Station) an examination of livestock drinking water standards for the dams and an identification of the level of protection needs to be conducted.	8.4	Surface Water
10	h	EPA	The quality of waters entering the environment as a result of stormwater discharge will need to be at a standard comparable with the receiving environment. The proponent has provided mitigation measures to ensure water quality standards are met through licensing conditions. It would be relevant to include a discharge regime and proposed treatment system in the Supplement.	8.4	Surface Water
10	i	EPA	Key strategies to maintaining both the beneficial uses and water quality objectives for the Mary River Catchment are: retain as much vegetation on site as possible; revegetate disturbed areas as soon as possible; and protect riparian zone vegetation. Maintaining water quality while removing habitat in the riparian zone may not sufficiently protect the beneficial uses of aquatic ecosystem protection for Mary River system.	8.4	Surface Water
10	j	EPA	The statement on page 91 that compares aluminium in the dewatering discharge with that of natural watercourses is incorrect. The range reported in Schultz et al 2002, is actually <5 - 260 ug/L (Table 27) for the Mary River Catchment. Therefore 6 800 ug/L is well above this value by a factor of approximately 45.	8.4	Surface Water
10	k	EPA	As stated in the PER (pages 27 and 117), dewatering flows will be diluted by approximately 50 percent with natural runoff before discharge into the Frances Creek Main Dam. Figures presented for the Helene 6/7 pit dewatering illustrate highly elevated levels of aluminium compared to local surface waters. The 90th percentile for local waters is 150ug/L, while the pit water has a value of 6 800 ug/L requiring a minimum dilution of approx 45 times. The pit water should be subject to a water management hierarchy approach, including avoidance of discharge, re-use, recycling or treatment before disposal. If disposal is required a dilution regime will be needed including: <ul style="list-style-type: none"> <li>● Appropriate treatment;</li> <li>● Setting of water quality targets;</li> <li>● Accounting for seasonality;</li> <li>● 1Q20 (one day in 20 year low flow) worst case low flow analysis;</li> <li>● Scenario Planning for start of flow, base flow, recession flow and cease of flow; and</li> <li>● Toxicant assessment for total and filterable metals including any hardness modified trigger levels.</li> </ul>	6.5, 8.4	Surface Water
10	l	EPA	Although reference is made to Appendix 4 within the section on water discharge, it is unclear if the values represented in Table 27 of the PER are totals or filterable.	8.4 Table 27	Surface Water

<b>Submission No.</b>	<b>Comment No.</b>	<b>Submittor</b>	<b>Comment</b>	<b>PER Reference</b>	<b>Subject</b>
10	m	EPA	The PER advises that Territory Iron will use one of two alternative routes for haulage (page 28). The Supplement should indicate which haul route will be used for the mining operation so that appropriate clearances can be obtained for heritage and sacred sites.	4.7	Transport
10	n	EPA	Although explanation has been provided for the selected location of the processing plant (west of Helene 5 pit), an alternative location has not been provided in the PER. As previously identified, the swamp associated with the Tailings Storage Facility is considered to be a sensitive habitat (even though it is man made). By providing an alternative location for the processing plant, the stockpiles which need to be either side of the plant may then be moved away from the swamp.	5.2	Alternatives
10	o	EPA	As stated in the PER, Territory Iron is planning to provide accommodation at a former mining camp at Pine Creek (page 140). Territory Iron also recognises that there will be increased pressure on Pine Creek accommodation and medical services (page 113). The supplement should identify alternative workforce accommodation in anticipation that the former mining camp at Pine Creek may not be feasible.	5, 8.13	Alternatives
10	p	EPA	It has been stated that a Gouldian Finch monitoring program and Management Plan will be established (page 99). Table 17 lists species of conservation significance recorded from or expected to occur within the projected area. It is also important to include species listed as vulnerable and near threatened into a monitoring program.	8.6	Fauna
10	q	EPA	Assessment of the aquatic ecosystems was conducted in May 2006 (page 66), and although no aquatic fauna of conservation significance were observed, a monitoring program of aquatic species should also be considered in order to detect impacts from the mining operation and to satisfy the requirements the declared Beneficial Uses (environmental i.e. to provide water to maintain the health of aquatic ecosystems).	8.6	Fauna
10	r	EPA	Commitment 8.6.2c: Reporting sightings of species of conservation significance to the Northern Territory Parks and Wildlife Commission. As a management and mitigation measure, how will this be used to minimise loss of fauna habitat and to re-establish appropriate habitat through rehabilitation?	8.6	Fauna
10	s	EPA	Section 8.6: Fauna, raises the issue of removal of Ghost Bat roost through destruction of the historical conveyor tunnel. Commitment 8.6.2f & g relates to this matter. The action should be the construction of an artificial alternative ghost bat roosting site. This would be proactive if undertaken prior to the destruction of the existing roost site and should be a high priority commitment considering the near threatened status of the Ghost Bat.	8.6	Fauna
10	t	EPA	Commitment 8.6.2j states that the proponent will participate in feral animal control programs on Ban Ban Springs and Mary River West stations, if requested by owners. A firmer commitment to feral animal control should be provided by Territory Iron. Mining activities could attract cane toads by providing permanent water bodies and industrial lights. Simple trapping techniques could be employed to reduce the number of cane toads and the negative impacts this introduced species has on native fauna. FrogWatch have developed a number of traps designed specifically to capture cane toads. A management program to control cane toads and other feral animals, as listed on page 70, should form the basis of another commitment by Territory Iron.	8.6	Fauna

Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
10	u	EPA	Baseline information on prevailing wind direction and maximum wind gusts as requested in the Guidelines have not been provided in the PER. understanding of this meteorological condition can assist with design layout of the ROM and maximising mitigation measures relating to dust, air quality, and noise dispersion levels.	8.7	Air Resources Management
10	v	EPA	Section 6.8: Air Quality states that particulate levels are expected to vary seasonally due to, among other things, bushfires. Commitment 8.7: Air Resources could include an action for minimising the risk of contributing to starting fires such as spark arresters on machinery, ULP vehicle movements in dry grass (although it is expected that vehicles will be diesel) employee commitment to NOT throwing cigarettes or matches from vehicles and an awareness of operating procedures on Total Fire Ban days or High Fire Danger days.	6.8, 8.7	Air Resources Management
10	w	EPA	Territory Iron considers that the location of the mine site is isolated, however mechanisms for the community to lodge complaints relating to dust and noise will need to be made available. Provision of this service will need to be included and the proponent will need to develop a method of monitoring and assessing any complaints.	8.7	Air Resources Management
10	x	EPA	Aquatic ecosystem condition assessment is essential to determine appropriate levels of protection for aquatic toxicants. Condition assessments include physio - chemical and biological monitoring such as AUSRIVAS. Regular assessment of aquatic ecosystem condition is required and action must be taken to maintain or enhance aquatic ecosystem condition if required.	6.5, 6.6, 8.4, 8.5	Surface Water
10	y	EPA	The proponent has declared that there are no known Threatened Ecological Communities (TEC) which occur within the Frances Creek project area (page 65). However Table 17 provides a list of species of conservation significance. Species of conservation significance use the ecological community.	6.6	Vegetation
10	z	EPA	Commitment 8.6.2i refers to the development of a Wildlife Rescue Procedure. Further details regarding relocation of animals to appropriate habitat ranges needs to be provided. This should include an understanding of the territorial nature of some species. Birds and animals can only be moved successfully if there is unoccupied territory available.	8.6	Fauna
10	aa	EPA	The proponent has provided basic information regarding Greenhouse Gas Emissions, however many of the issues identified for consideration in the PER Guidelines and Appendix A "NT Environmental Impact Assessment Guide: Greenhouse Gas Emissions", have not been addressed.	6.8, 8.7	Greenhouse Gases
10	ab	EPA	For example, measures to be undertaken to minimise greenhouse, emissions have not been outlined. Commitment 8.7.2.3 (a) relating to Greenhouse commits Territory Iron to "joining the... Greenhouse Challenge program and monitoring greenhouse emissions and efficiency". While participation in "Greenhouse Challenge Plus" (note name change) is appreciated, for public transparency some outline in the PER of potential emissions minimisation measures would be appropriate.	6.8, 8.8	Greenhouse Gases
10	ac	EPA	It is recommended that the proponent join the Commonwealth Government's Greenhouse Challenge Plus program, and investigate opportunities to offset greenhouse gas emissions from the proposed operation.	8.7.2.3	Greenhouse Gases
10	ad	EPA	Similarly, the proponent needs to consider investing in any greenhouse offsets. If mining was to proceed the Environment Protection Agency Program would expect the proponent to identify opportunities for offsetting greenhouse gas emissions from the operations.	6.8, 8.9	Greenhouse Gases

Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
10	ae	EPA	Greenhouse emissions from land clearing should be presented in Table 30 titled "Predicted Emissions" (page 102 of Volume 1 of the PER) so that a complete total for the project is clearly presented.	6.8, 8.10	Greenhouse Gases
10	af	EPA	Section 8.5: Vegetation and Flora states that 172 hectares of native vegetation will be cleared for the project. The statement in Section 8.7.1.1: Greenhouse Gases that "new clearing is about 94 hectares" is irrelevant as degraded and regrowth vegetation still produces emissions when cleared. The 172 hectares of clearing represents approximately 43,000 tonnes of greenhouse emissions, which should be included in Table 30 on page 102.	6.8, 8.11	Greenhouse Gases
10	ag	EPA	The final sentence of section 8.7.1.1 states that emissions from land clearing will be "balanced" by carbon uptake during revegetation. Given that not all areas cleared will be revegetated, and there will be a very significant time lag before woodland is fully regrown on revegetated areas, it would be accurate to use the term "partially offset" here, rather than "balanced".	6.8, 8.12	Greenhouse Gases
10	ah	EPA	Table 30, titled "Predicted Emissions of Greenhouse Gases" and the subsequent text regarding emissions of methane from landfill are confusing. It is unclear whether the methane emissions are included in the figures shown in Table 30 against "landfill", and how they are calculated to be 31.4 kg per year, when CO2 equivalent from landfill is calculated to be 1.2 tonnes. A clear outline of total emissions and sources needs to be provided.	6.8, 8.13	Greenhouse Gases
10	ai	EPA	The Northern Territory Government is committed to introducing mandatory public reporting of greenhouse gas emissions by major industry. Implementation of this commitment is currently being explored in relation to a Council of Australian Governments commitment to report on the preparation of national purpose-built legislation to provide for cost-effective mandatory reporting and disclosure of greenhouse and energy data at the company level at the earliest practicable date.	6.8, 8.14	Greenhouse Gases
10	aj	EPA	It is noted that the proponent has already made a commitment to join the Greenhouse Challenge Plus program. Reporting obligations under the Greenhouse Challenge include: providing timely annual reports with agreed content on greenhouse gas emissions and emission reduction activities; making accurate annual public statements about participation in the program; and participating in independent verification of annual progress reports. Until a national or Northern Territory reporting system is established, it is recommended that annual reporting should be undertaken through the Environmental Management Plan/Mining Management Plan process. At a minimum, reporting should detail total annual greenhouse gas emissions, provide a breakdown of emissions by gas and source (actual emissions and in carbon dioxide equivalents), and the emissions intensity of production.	6.8, 8.15	Greenhouse Gases
10	ak	EPA	Whilst Heritage Conservation Services notes that the proponent has undertaken an archaeological survey of mining tenement MLA 24727, it is also noted that the proposal includes Ms 25087, 25088, 25152, 25152, 25396 and 25529. While it is understood that a proportion of this land is disturbed through previous mining activity, the proponent has not investigated whether use of these areas will impact on cultural heritage resources. The proponent should give consideration to cultural heritage issues for these additional areas by either investigating the potential for previously unrecorded places protected under the <i>Heritage Conservation Act</i> or demonstrating the extent of disturbance (this <b>may</b> simply involve a desktop exercise).	7.1, 7.2, 8.12	Cultural Heritage

Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
10	al	EPA	The archaeological survey report for MLA 24727 accords recorded archaeological sites with a low to moderate level of significance on the basis of comparison with the Mt Porter sites complex. Although data describing archaeological site structure is provided for sites recorded within MLA 24727, this data is not provided for the Mt Porter sites on which the comparison is made.	7.2	Cultural Heritage
10	am	EPA	The archaeological study acknowledges that the site known as Frances Creek 3 is relatively large in area and contains a dense and diverse range of stone artefact types and stone raw materials and states that this site has the highest significance. The structure described within this study tends to indicate major occupation site and should arguably be accorded with a high level of significance.	7.2	Cultural Heritage
10	an	EPA	Section 8.12.1 (Page 111) states "increased level of employment among the local indigenous population" as a potential Aboriginal Cultural Impact. This sentence should be included in the Section 8.13 Socio Economic Environment.	8.12, 8.13	Social Impact
10	ao	EPA	Commitment 8.12.2a should focus on historical documentation of the existing rail spur line prior to the proposed upgrade to a haulage road. An archaeological survey should be undertaken for the 2.4km section between the historical rail spur line and the Alice Springs to Darwin Railway and the proposed Rooney siding. Consideration should also be given to the location of the proposed siding in relation to the existing cultural heritage studies for the Alice Springs to Darwin Railway (see ADrail 2003). Extant sections of the North Australian Railway (NAR) between Birdum and Darwin have been nominated to the Northern Territory Heritage Register and are currently under assessment. The proponent should consult with Heritage Conservation Services regarding the proposed crossing point and demonstrate how they will limit the damage to extant NAR infrastructure.	8.12	Cultural Heritage
10	ap	EPA	Regarding Commitment 8.12.2h, the proponent should note that all archaeological places and objects, whether previously recorded or not and of high or low significance are afforded blanket protection under the <i>Heritage Conservation Act</i> . Consent to disturb archaeological places or objects (including isolated artefacts) is required from the Minister for Environment and Heritage or their delegate.	8.12	Cultural Heritage
10	aq	EPA	The proponent has stated that only the site known as Ochre Hill 1 is scheduled to be impacted upon, meaning that the remaining 7 sites recorded (Frances Creek 1-5, Ochre Hill 1 & 2) during the archaeological survey of MLA 24727 (Hill 2005) are scheduled to be retained. Appropriate long term management should therefore be devised and incorporated into any EMP / MMP to be drafted for the operations phase. These strategies should incorporate the views and or wishes of the Aboriginal traditional owners /custodians referred to section 7.3. Heritage Conservation Services is not currently processing the penult application under section 29 referred to in Section 8.12.3. Territory Iron should note that this application process takes 4 - 6 weeks.	8.12	Cultural Heritage
10	ar	EPA	The proponent should liaise with Heritage Conservation Services and provide more specific detail regarding recommendations (2, 3, 4, 5, 7 & 8) made by Hill (2005).	8.12	Cultural Heritage
10	as	EPA	As outlined in Commitment 8.6.2h, the proponent intends on restricting speeds on haulage routes and mine roads to minimise fauna death on roads. As an added precaution, signs should also be erected to warn mine employees of wildlife movements.	8.6	Fauna



Submission No.	Comment No.	Submittor	Comment	PER Reference	Subject
10	at	EPA	Guidelines for the PER required the preparation and inclusion of a draft Environmental Management Plan (EMP). The PER states on page 11 that: "A draft Environmental Management Plan is included in this PER" This has not been submitted. The PER later states (page 132) that: "An Environmental Management Plan (EMP) will be developed in consultation with DPIFM and NRETA before construction starts. However, as requested, the proponent will need to provide the EPA Program with a draft EMP or an outline of the proposed EMP for review as part of the environmental assessment process and not at the completion of the process as suggested on page 11 of the PER.	Appendix 12	EMP