

Submission on Supplementary Environmental Report

Groote Eylandt Mining Company Pty Ltd – GEMCO Excess Water Disposal Project

This submission is made under regulation 123 of the Environment Protection Regulations 2020

NT EPA reference number: EP2025/043

Government authority: Aboriginal Areas Protection Authority

Section of referral or terms of reference	Theme / issue	Comment
Main report 7.3.6 Pg 72	Culture and heritage risk	- The report describes the potential risk for heritage and concludes it is a low risk and low likelihood of encountering unknown sites. - The likelihood of encountering Aboriginal sacred sites is unknown until an Authority Certificate is issued.
Appendix A Figures 38,39 43 Pg 46, 47, 52	Zone of influence for chemistry and suspended solids	The areas shown in these figures, in addition to construction and operational footprints, may contain Aboriginal sacred sites and will form part of the subject land in the Authority Certificate.
Appendix A Figure 45 Pg 54	Zone of influence and accumulation prediction	- The figure shows an accumulation of up to 1400g/cm² outside the zone of influence, defined as the area where 3mm or more depth of sediment is predicted to accumulate. - Please confirm that the zone of influence area is correct. 1.4 kg of sediment can accumulate in one square metre and form a depth of less than 3mm?
Appendix D D5 Pg 115	Mitigation measures	- The proponent has applied for an Authority Certificate, but it is not yet issued. - Mitigation measures as well as the location of infrastructure need to account for restricted work areas and conditions on the Authority Certificate.