

Submission on draft terms of reference

Verdant Minerals Ltd – Ammaroo Ammonium Phosphate Fertiliser Project

This submission is made under regulation 103 of the Environment Protection Regulations 2020

NT EPA reference number: EP 2022/020

Government authority: Aboriginal Areas Protection Authority

Section of terms of reference	Theme / issue	Comment
2.4.2	Environmental Values	<p>Second bullet: <i>hydrogeology including groundwater systems....</i></p> <p>Should include understanding of hydraulic connectivity between superficial aquifers and target aquifer for extraction, which is identified as a potential risk under Potential impacts and risks.</p> <p>Suggested edit:</p> <ul style="list-style-type: none"> hydrogeology including groundwater systems, yields, storativity, transmissivity, water movement, connection with other aquifers, recharge rates, recharge/discharge pathways and quantitative water balance
2.4.2	Potential impacts and risks	<p>The first bullet point gives examples of groundwater dependent ecosystems; please add "Aboriginal sacred sites" to the examples.</p>
2.4.2	Potential impacts and risks	<p>The final requirement is stated to be:</p> <p><i>Quantify the significance of proposal impacts using:</i></p> <ul style="list-style-type: none"> <i>the latest draft of the Western Davenport Water Allocation Plan</i> <i>the latest draft of the Northern Territory Water Allocation Planning Framework</i> <i>Relevant guideline thresholds.</i> <p>The relevant guideline thresholds are the 'limits of acceptable change' in the Western Davenport Water Allocation Plan, which allows groundwater drawdown to an extent where up to 30% of groundwater dependent ecosystems may be impacted.</p> <p>However, impacts to Aboriginal sacred sites are not acceptable.</p> <p>Accordingly, in addition to quantifying the impacts using the above guidelines the applicant's EIS should also present the full modelled drawdown area for consideration of potential impacts to groundwater dependent Aboriginal sacred sites.</p>

