

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: Aboriginal Areas Protection Authority (AAPA)

Section of Referral	Theme or issue	Comment
3.6 Pg 79	Cultural heritage surveys	<ul style="list-style-type: none"> AAPA has received an application for an Authority Certificate including the cultural heritage surveys referred to. AAPA will liaise with the proponent regarding their application.
Table 8.2-8 Pg 211	Culture and Heritage risks	<ul style="list-style-type: none"> Additional activities could impact the culture and heritage factor, including: uncontrolled wastewater release, pit overtopping, erosion and sedimentation, dewatering, drainage, salinity, changes to coastal processes, and shipping spills.
9.4.2.4 Pg 458 Pg 460 Figure 9.3.27 Pg 462 Table 9.4-5 Pg 471	Groundwater drawdown	<ul style="list-style-type: none"> The modelling of the mining phase and 10 years post-mining indicate groundwater levels may be lower east of the MMZ pit. An Aboriginal sacred site comprising a billabong is located in this area. Being situated close to the coast, the billabong is likely to consist of groundwater and sea water inflow components seasonally and potentially diurnally with tides. Changes to the groundwater flow component may affect the aquatic and riparian ecosystem which may constitute damage to the sacred site. We support the plan to backfill the MMZ pit void to avoid these impacts becoming permanent. If additional Aboriginal sacred sites are identified during research for the Authority Certificate that could be impacted, then additional mitigation measures may need to be considered.
Figure 9.4.29 Pg 465 Pg 467 Figure 9.6-6 Pg 563	Groundwater salinity	<ul style="list-style-type: none"> The modelling of the mining phase through to 100 years post-mining indicate that salinity may be higher east of the main pit. An Aboriginal sacred site comprising a billabong is located in this area. The report states that mining activity will create a saline water body in the final MMZ pit void, and subsequently it was decided that the pit void would be backfilled as a mitigation measure. Changes to the salinity of the billabong may affect the aquatic and riparian ecosystem which may constitute damage to the sacred site. We support the plan to backfill the MMZ pit void to avoid these impacts.
9.4.4 Pg 473 9.5.4 Pg 530	Monitoring period	<ul style="list-style-type: none"> The report states that monitoring will be undertaken during the mine life including construction, operation, and decommissioning. Groundwater modelling indicates impacts may occur long beyond the mine life. Monitoring should continue until data is sufficient to determine that there are no long-term impacts to Aboriginal sacred sites, and mitigation measures to prevent impacts are demonstrated to be successful.

Table 9.6-10 Pg 569		<ul style="list-style-type: none"> • If additional Aboriginal sacred sites are identified during research for the Authority Certificate that could be impacted, then additional monitoring measures may need to be considered. • Regular monitoring should be undertaken pre-construction to understand baseline conditions, as well as during mining and post-mining.
9.5.2.4 Pg 517	Controlled discharges	<ul style="list-style-type: none"> • It is proposed that surface water will be discharged on bushland adjacent to coastal areas east of MMZ pit. • An Aboriginal sacred site comprising a billabong is located in this area. Discharge should avoid affecting groundwater levels and groundwater quality near the sacred site. • If additional Aboriginal sacred sites are identified during research for the Authority Certificate, then the location of controlled discharges may need to be reconsidered to avoid any adverse impact.
9.7.2.1 Pg 620	Bedload transport	<ul style="list-style-type: none"> • The report states that '<i>Updrift accumulation at the shore and against the breakwater will evolve progressively as the sand accumulates</i>'. • Changes in sediment transport in currents and waves caused by the breakwater will lead to deposition upstream of the breakwater and consequently erosion downstream.
Figure 9.7-30 Pg 628	Predicted impacts to coastline and near-shore	<ul style="list-style-type: none"> • Figure 9.7-30 shows areas of predicted erosion and accretion of sediment in the vicinity of the breakwater, and migration of sand bars due to wharf construction, dredging, and barge ore spills. • The area may contain Aboriginal sacred sites. The cultural heritage surveys completed by the proponent identify sites in the vicinity of the predicted erosion or accretion. Erosion or accretion of sediment within a sacred site may constitute damage to a sacred site.
9.7.3 Pg 629	Mitigation	<ul style="list-style-type: none"> • If the research for the Authority Certificate identifies Aboriginal sacred sites in this area, then re-design of the wharf and/or mitigation measures may be required.
9.7.2.1 Pg 622	Dredge and spoil disposal	<ul style="list-style-type: none"> • The report states that the volume of sediment spread over the disposal area would result in a sediment thickness of 0.35 metres.
Figure 9.8-15 Pg 669	Sedimentation Impacts	<ul style="list-style-type: none"> • Figure 9.8-15 and Appendix S presents dredge spoil plumes of suspended sediment concentrations over a wide area around the dredging and disposal sites, and Figure 9.8-19 shows that no impacts are expected outside the dredging and disposal footprint.
Appendix S		<ul style="list-style-type: none"> • It is understood that the disposal site was chosen in consultation with the Anindilyakwa Land Council (ALC).
9.8.2.3 Pg 672		<ul style="list-style-type: none"> • If the research for the Authority Certificate identifies Aboriginal sacred sites in the disposal area, then relocation of the disposal site may be required.
Figure 9.8-19 Pg 676		
9.7.2.1 Pg 624	Transshipment ore spill	<ul style="list-style-type: none"> • Spill of ore is a risk identified from the transshipment from the wharf on barges to an area for transfer to ocean-going vessels.

		<ul style="list-style-type: none"> The transshipment route is close to a Dreaming site identified in the cultural surveys provided by the proponent. If the research for the Authority Certificate identifies Aboriginal sacred sites in this area, then a spill of ore onto the seafloor may constitute damage to a sacred site. If the research for the Authority Certificate identifies Aboriginal sacred sites in this area, then the transshipment route may need to move west to eliminate this risk.
9.13.1.3 Pg 922	AAPA register	<ul style="list-style-type: none"> The report states that: <i>'no sacred sites listed on the AAPA register occur within or immediately adjacent to the proposed Project area'</i>. Note that AAPA has not conducted research on Winchelsea Island so any records in this area are very limited. However, the Aboriginal sacred sites that are in AAPA's records are within the vicinity of the project area. The proponent has recently applied for an Authority Certificate. The Authority Certificate process (including review of the research described by the proponent) will determine whether additional Aboriginal sacred sites are present within or in the vicinity of the project area and the conditions necessary to protect all sites.
Table 9.13-8 Pg 936 Pg 937	P-27/28 weed infestation P-30 fire P-31 poor water quality runoff P-38, P-39 significant release of chemicals	<ul style="list-style-type: none"> The report states that: <ul style="list-style-type: none"> weeds may affect food gathering activities and damage rock art. fire may damage rock and rock art. poor water quality runoff may affect human health by consumption of food and water. chemical releases may affect human health and food gathering activities. Aboriginal sacred sites may also be impacted by each of these mechanisms if the integrity of the environment is affected, for example degrading sacred sites comprising trees or water features.
Table 13.2-1 Pg 1123	Culture and heritage	<ul style="list-style-type: none"> The report states that <i>'The potential for physical disturbance to significantly impact cultural heritage sites or related activities is therefore considered low'</i> relating to the risks identified in the EIS. As an Authority Certificate has yet to be obtained, this statement is premature, and is not supported by the appropriate and necessary evidence, having regard to the risks to Aboriginal sacred sites in the project area and vicinity.
Appendix M Appendix N	Monitoring locations	<ul style="list-style-type: none"> Marine and terrestrial invasive species and weeds are present on Groote Eylandt and the risk of introduction to Winchelsea Island has been identified. Locations for monitoring are in the wharf area where introduction could occur, and across the project area. Monitoring should also occur in areas that are in the vicinity of Aboriginal sacred sites to be identified in consultation with custodians of sacred sites and reflected in the Authority Certificate (to be prepared).