

Referral Form

Refer proposed action or strategic proposal under the *Environment Protection Act 2019*

Before you fill in the form

Guiding notes

- This form must be read in conjunction with environmental impact assessment guidance for proponents on the [NT EPA website](#) including Referring a proposal to the Northern Territory Environment Protection Authority (NT EPA).
- This form contains five (5) parts:
 - Part A – Proponent details
 - Part B – Proposal details
 - Part C – Referral details
 - Part D – Referrer declaration
 - Part E – Nominated contact.
- This form contains two checklists:
 - Cross reference of matters addressed in the referral report
 - Proponent’s general duty.
- This form will be published.
- Further guidance or example responses are provided below in light grey text.

These guiding notes may be deleted before submitting the referral form and report.

PART A – Proponent details	
Name of the proponent <i>(legal entity)</i>	Groote Eylandt Mining Company Proprietary Limited
Proponent details	<i>Name:</i> Robyn Ryan <i>Position/responsibility:</i> Vice President Operations <i>Physical address:</i> Rowell Highway, Alyangula NT 0885 <i>Postal address:</i> : Rowell Highway, Alyangula NT 0885 <i>Phone:</i> 08 8987 4264 <i>Email:</i> robyn.ryan@south32.net
Proponent Trading Name if relevant	Groote Eylandt Mining Company Proprietary Limited
Australian Business Number/s Australian Company Number/s	ABN: 26 004 618 491 ACN: 004 618 491
Provide a description of the organisational structure with respect to responsibility of the	The proponent of the proposed action is the Groote Eylandt Mining Company Pty Ltd (GEMCO). GEMCO is wholly responsible for the proposed action, environmental approvals and project implementation.

proposed action, environmental approvals and implementation.	South32 holds a 60 per cent share in GEMCO and Anglo American Plc holds the remaining 40 per cent
Joint-venture partners (if applicable)	<i>Name:</i> South32 Aluminium (Holdings) Pty Ltd <i>Physical address:</i> Level 35, 108 St Georges Terrace, Perth WA 6000 <i>Postal address:</i> Level 35, 108 St Georges Terrace, Perth WA 6000 <i>Phone:</i> +61 (0) 8 9324 4000 <i>Email:</i> company.secretary@south32.net <i>Name:</i> Anglo Operations (Australia) Pty Limited <i>Physical address:</i> Level 11, 201 Charlotte Street, Brisbane QLD 4000 <i>Postal address:</i> GPO Box 1410, Brisbane QLD 4001

PART B – Outline of the proposal and location

Outline of the proposed action or strategic proposal (proposal)

Name of proposal	GEMCO Excess Water Disposal project
Provide a brief summary (one or two paragraphs) of the proposal including the activity type/ industry/ duration.	Construction and operation of a new water disposal pipeline from the GEMCO mine site to the ocean to allow discharge of up to 80 GL pa of water from the mine quarries. The infrastructure is expected to take up to one year to construct and the pipeline will be operational throughout the operation and closure of the mine.

Location

Provide location details as: a) street address, suburb	N/A. The Proposal area is on the western side of Groote Eylandt at/adjacent to the Port, the Rowell Highway and GEMCO's Western Leases.
b) tenement, lot/section numbers, town/hundred, NT Portion or pastoral lease numbers, as applicable	MLN951 (NT Portion 1669). MLN956 (NT Portion 1671). MLN956 (NT Portion 1305). MLN2 (NT Portion 1632). SPL383 (NT Portion 1306). SPL383 (NT Portion 1031). SPL383 (NT Portion 1632).

	Off lease on NT Portion 1632. Off lease Milner Bay.
c) the nearest town, recognisable feature, and distance and direction from that town/feature to the site of the proposed action.	GEMCO's Western Leases is the main development on Groote Eylandt and extends over an area covering approximately 90 km² on the western side of the island. The Proposal area is on the western side of Groote Eylandt at/adjacent to the Port, the Rowell Highway and GEMCO's Western Leases.
Name of the Local Government Area/s in which the proposal is located.	Groote Archipelago Region
What is the land tenure type, and proposed land tenure type ?	MLN951 (NT Portion 1669): Crown – registered mineral lease MLN956 (NT Portion 1671): Crown – registered mineral lease MLN956 (NT Portion 1305): Crown – registered mineral lease MLN2 (NT Portion 1632): Crown – registered mineral lease SPL383 (NT Portion 1306): Special purpose lease SPL383 (NT Portion 1031): Special purpose lease SPL383 (NT Portion 162): Special purpose lease Off lease on NT Portion 1632: Aboriginal freehold land Off lease Milner Bay: Crown land and Aboriginal freehold land Off lease areas may be subject to access authorities following land access agreements. No other changes to land tenure are proposed.
Does the proponent have the legal (land) access required for the implementation of all aspects of the proposal?	☒ No GEMCO will obtain land access and tenure for the Proposal as required for any of the off-lease areas prior to construction commencing. Access to Aboriginal freehold land would require GEMCO to negotiate with the ALC and enter into access arrangements on behalf of the traditional owners. Access to Crown Land will require engagement with the NT Government.

	☐ Yes If yes, provide an indication of legal access authorisations / agreement / tenure.
Is the land zoned under the NT Planning Scheme ?	☒ No ☐ Yes If yes, what is/are the zoning/s?
What is the current land use of the proposal site/s?	MLN951 (NT Portion 1669): Mining MLN956 (NT Portion 1671): Mining MLN956 (NT Portion 1305): Transport infrastructure MLN2 (NT Portion 1632): Power infrastructure SPL383 (NT Portion 1306): Infrastructure and stockpiling associated with mining SPL383 (NT Portion 1031): Infrastructure and stockpiling associated with mining SPL383 (NT Portion 162): Infrastructure and stockpiling associated with mining Off lease on NT Portion 1632: Vacant land, adjacent transport infrastructure Off lease Milner Bay: Coastal waters
What is the approximate distance (direct line) and direction to the closest human sensitive receptor? For example, residence, accommodation, hospital, school, homeland from the proposal.	Section 4.6 of Appendix E (Air Quality Assessment Report) contains information regarding human sensitive receptors. The nearest residence is located approximately 130 m west of the linear construction footprint.
What is the proposed end land use of the proposal site/s	Water infrastructure (associated with mining)
Consultation	
Provide an overview of consultation undertaken specific to the proposal and potential environmental impacts.	GEMCO collaborated with the ALC to identify affected stakeholders and deliver engagement activities that provided information about the Proposal and captured stakeholder feedback. GEMCO has attended or held seven face-to-face meetings, three of which were with relevant Traditional Owners and Senior Clan members. Additionally, GEMCO's External Affairs team resides

	on Groote Eylandt and regularly engages with the ALC on routine business.
List the matters raised in consultation and identify how the proposal has been modified to respond to stakeholder feedback.	During engagement, the ALC and Traditional Owners asked questions or provided feedback on the following key topics: - quality of the discharge water - engagement and communications approach - community use of the proposed site - culturally important sites - tourism - marine ecology values and potential impacts - construction timeline and impacts. GEMCO responded to feedback and questions received throughout the engagement process either directly during engagement or by providing further information at the subsequent event or via meetings or electronic communication afterwards. The feedback from the ALC and Traditional Owners confirmed that the Proposal's aim of avoidance of impacts on culturally significant sites and environmentally sensitive areas and the development of detailed technical studies were able to provide assurance that impacts to community and stakeholders have been considered and are managed appropriately.
PART C – Referral type	
What type of proposal is being referred?	☒ proposed action ☐ strategic proposal ☐ proponent initiated EIS referral
Provide a brief justification including the reasons why you consider the action may have a significant impact on the environment and is referred to the NT EPA. Refer to section 11 of the EP Act and the NT EPA's environmental factors and objectives.	The self-assessment determined that the Proposal has the potential to significantly impact three of the 14 environmental factors. These are listed below. • LAND • Terrestrial ecosystems • SEA • Marine environmental quality • Marine ecosystems

Does the proposal involve an action that may be or is a controlled action under the Commonwealth <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act)?	☐ Yes ☒ No
Has the proposed action been referred?	☐ Yes ☒ No If yes, provide the date referred and reference number (EPBC number)? Date: EPBC number:
If referred, has a decision been made on whether the proposed action is a controlled action?	☐ Yes ☐ No If yes, check the appropriate decision outcome and provide the decision in an attachment. ☐ Decision – controlled action ☐ Decision – not a controlled action
PART D – Proponent referrer details and declaration *The referral form must include the declaration signed by the proponent, or where the proponent is an organisation or business, the Chief Executive Officer (CEO) or duly authorised delegate within the proponent company.	
Who is referring this proposal?	☒ Proponent ☐ Authorised representative within proponent entity
Does the proponent request that the NT EPA treat any part of the information in the referral as confidential under section 281(2) of the EP Act?	☐ No ☒ Yes If yes, provide an application in accordance with regulation 271 of the Environment Protection Regulations 2020 and submit the confidential information as a separate attachment
Referral declaration <u>by proponent</u>: I, Robyn Ryan, declare that I am authorised to refer this proposed action/strategic proposal on behalf of Groote Eylandt Mining Company Proprietary Limited, and further declare that: - the attached environmental impact assessment documents have been prepared in accordance with the EP Act and EP Regulations; and - the attached environmental impact assessment documents (including attachments) are true; and	

- the attached environmental impact assessment documents do not provide false or misleading information and I know it is an offence to provide false and misleading information, noting the penalties under section 260 of the EP Act, and section 119 of the *Criminal Code Act 1983*; and
- the proponent fully understands that referral under the EP Act does not limit, in any way, the requirements of the proponent to ensure approvals under any other regulatory regime are applied for, and adhered to; and
- the proponent has fulfilled its general duty in accordance with section 43 of the EP Act.

Note: if the NT EPA determine that an environmental approval is required, the proponent will be requested to provide supporting documents during the assessment process such as details to support that the person is a fit and proper person to hold an environmental approval in accordance with section 62 of the EP Act

Name: [Robyn Ryan](#)

Signature: *Robyn Ryan*

Date: 27/5/2025

Position: [Vice President Operations \(GEMCO\)](#)

Organisation (if a business or organisation): [Groote Eylandt Mining Company Proprietary Limited](#)

Email: robyn.ryan@south32.net

Address: [Rowell Highway, Alyangula NT 0885](#)

PART E – Nominated contact

Contact details for proponent contact (provide the details for the person who will be corresponding with the NT EPA on the proposal)

Business name: [South32](#)
Name of primary contact: [Will Longworth](#)
Physical address: [Level 8, 2 King Street, Fortitude Valley QLD 4006](#)
Postal address: [Level 8, 2 King Street, Fortitude Valley QLD 4006](#)
Phone: [+61 8 8987 4264](#)
Email: will.longworth@south32.net

Contact details of consultant (if relevant, provide the details for the person who will be

Business name: [GHD Pty Ltd](#)
Name of primary contact: [Brioni Armstrong](#)

corresponding with the NT EPA on the proposal on behalf of the proponent)	<i>Physical address:</i> Level 7/24 Mitchell Street, Darwin NT 0800 <i>Postal address:</i> As above <i>Phone:</i> +61 7 4720 0433 <i>Email:</i> brioni.armstrong@ghd.com
---	--

CHECKLIST 1 - Cross reference of matters addressed in the referral report (for more detail refer to the Referring a proposal to the NT EPA guidance)

Item	See Referral guidance for further detail on information requirements	Report section / page
<i>Publication statement</i>	Provide name and qualifications of relevant contributors to the referral.	Section 1.4 – Publication statement
<i>Executive summary</i>	Overview of the proposal, its potential for significant impact and key conclusions.	Executive Summary – page i
<i>Introduction</i>	Include a brief introduction to the proposal and the proponent (noting proponent details are also to be included in the referral form / environmental approval application form).	Section 1 (1.1, 1.2 and 1.3)
<i>Proposal description - Key components</i>	Provide a clear and detailed description of the proposal, referencing maps and spatial information. Provide a key components summary table. Identify uncertainty / likely changes if particular elements of a proposal require further design at the time of referral. Provide an account of past, present and reasonably foreseeable future development, operations, or industries that are related the current proposal.	Section 2
<i>Proposal description - Location and regional context</i>	Location and regional context.	Section 2.1
<i>Proposal description – Alternatives (options)</i>	Describe any alternatives (location, timeframes, activities) considered or are under consideration in scoping and developing the proposal. Describe how the analysis of alternatives accounted for the <i>principles of environment protection and management</i> (Part 2 of the EP Act). Justification for the preferred/selected option. Describe any assumptions critical to your assessment.	Section 2.3

<i>Proposal description – Application of the:</i> – <i>Principles of environment protection and management (Part 2)</i> – <i>General duty of proponents (s43)</i>	Discuss how the proposal accounts for the <i>principles of environment protection and management</i> (Part 2 of the EP Act) and the general duty of proponents provided for under section 43 of the EP Act: • Principles of ecologically sustainable development • Environmental decision-making hierarchy • Waste management hierarchy.	Section 2.6
<i>Consultation</i> Refer to NT EPA Stakeholder Engagement guidance 2020	The EP Act (section 3 and section 43) puts an obligation on the proponent to consult with stakeholders and the community in the development of the proposal. As an example, the referral should include: • a description of stakeholder engagement and community consultation undertaken • an outline of the method and process of consultation with stakeholders • a summary of the key matters raised during consultation • any changes made as a result of consultation • the ongoing consultation, and options for feedback • whether the consultation has or has not been undertaken in accordance with NT EPA guidance on Stakeholder Engagement • whether the consultation has or hasn't been undertaken in accordance with the section 43 (EP Act) general duty of proponents (see Checklist 2).	Section 4
<i>Strategic and statutory context</i>	Table discussing proposal specific legislation, policies, and guidelines that are and may be applicable to the proposal and the sequencing and status of those, is provided.	Section 5
<i>Environmental Factors</i>	The sections below relate to information that describes the potential impacts of the proposal on the NT EPA's Environmental factors. Information requirements for each environmental factor identified by the pre-referral screening tool are provided (any technical studies and surveys included).	Section 6 Section 6.1 Section 6.2 Section 6.3 Section 6.4 Section 6.5 Appendix B Appendix C Appendix D Appendix E Appendix F Appendix G Appendix H

<i>Environmental Factors and objectives</i> Presence/absence of environmental values	<i>Repeat for each NT EPA Factor being considered for your proposal/referral</i> The presence or absence of relevant environmental values and sensitivities are verified. Specify the source and currency of information (e.g. desktop assessments, and/or field surveys, the methods used, dates, sources, and whether the approach is conducted in accordance with relevant regulatory and industry guideline.	Section 6 Section 6.1 Section 6.2.1 Section 6.3.1 Section 6.4.1 Section 6.5.1 Appendix B Appendix C Appendix D Appendix E Appendix F Appendix G Appendix H
<i>Environmental Factors and objectives</i> Potential impacts and consistency with relevant policy/guidance	<i>Repeat for each NT EPA Factor being considered for your proposal/referral</i> Assessment of potential impacts (negative, direct, indirect, cumulative, short and long-term) of the proposal. Relevant policy and guidance described. Residual / remaining impact to the environmental factor described.	Section 6 Section 6.1 Section 6.2.2 Section 6.2.4 Section 6.3.2 Section 6.3.4 Section 6.4.2 Section 6.4.4 Section 6.5.2 Section 6.5.4 Appendix B Appendix C Appendix D Appendix E Appendix F Appendix G Appendix H
<i>Environmental Factors and objectives</i> Environment protection and management	<i>Repeat for each NT EPA Factor being considered for your proposal/referral</i> Describe in terms of management hierarchies: • measures proposed to avoid, mitigate or offset (if appropriate) • effectiveness of proposed measures and the level of confidence of implementation	Section 6 Section 6.1 Section 6.2.3 Section 6.3.3 Section 6.4.3 Section 6.5.3 Appendix B

	whether the NT EPA's objective for the environmental factor is likely to be met.	Appendix C Appendix D Appendix E Appendix F Appendix G Appendix H
<i>Environmental Factors and objectives</i> Cumulative impacts	<i>Repeat for each NT EPA Factor being considered for your proposal/referral</i> Describe potential cumulative impacts.	Section 6 Section 6.1 Section 6.2.5 Section 6.3.5 Section 6.4.5 Section 6.5.5 Appendix B Appendix C Appendix D Appendix E Appendix F Appendix G Appendix H

CHECKLIST 2 - Consideration of the Proponent's general duty (in accordance with section 43 of the EP Act)

Section 43 General duty of proponents	Done	Comment
The following principles of ecologically sustainable development must be taken into consideration in the design of the proposed action.		Provide comment here
Decision-making principle	✓	The Proposal has considered both short- and long-term impacts and benefits – including impacts during construction and operation of the Proposal. Significant planning was undertaken as part of the Pre-Feasibility Study to identify and assess potential options for excess water discharge. A multi criteria assessment was undertaken to identify an option that has: - Avoidance of potential environmental impacts - Avoidance of known heritage features and acceptance by the Traditional Owners. - Approval pathways based on inferred significance of impact. - Operational effectiveness to achieve dewatering outcome. The option selected (this Proposal) offers the best environmental and heritage outcomes compared to alternatives.

		Further to this, the Proposal allows for flexibility and continuous improvement through the ability to modify discharge flow rate, operating times and mine-side source locations as the mining operation continues through the Proposal's operational phase.
• Principle of proportionality	✓	Mitigation measures have been proposed that account for the level of risk associated with the potential impact of the Proposal.
• Precautionary principle	✓	The Proposal has considered the potential for threats of serious or irreversible environmental damage from the excess water discharge pipeline development by undertaking comprehensive technical studies and field surveys completed by suitability qualified professionals within the Proposal study area. Modelling of the discharge plume within the marine environment through varying scenarios has also been completed to reduce the uncertainty of the potential environmental impacts of the Proposal as much as is possible.
• Principle of evidence-based decision-making	✓	This assessment is based on both existing information and field studies undertaken specifically for the Proposal by suitably qualified professionals. Both qualitative and quantitative approaches have been adopted to assess potential impacts from the Proposal on environmental values. Inputs from stakeholders have been used to inform the decision-making process on infrastructure planning, design and siting.
• Principle of intergenerational and intergenerational equity	✓	Planning and predictions of the possible intergenerational equity impacts have been undertaken through stakeholder engagement, the pipeline will be operational throughout the operation and closure of the mine with pumping to cease prior to mine closure and site relinquishment. Ongoing monitoring will be conducted during the Proposal's operational period to ensure ecological health, diversity and sustainability is maintained.
• Principle of sustainable use	✓	The Proposal lifecycle includes managing construction and operation of the excess water pipeline with sustainability principles in mind.
• Principle of conservation of biological diversity and ecological integrity	✓	The majority of the construction footprint is located within previously disturbed areas which minimises further loss of native vegetation. The Proposal and supporting technical reports document how it will avoid and mitigate potential impacts on biodiversity and ecological integrity to reduce the risk of significant impacts.
• Principle of improved valuation, pricing and incentive mechanisms	✓	The Proposal would be incorporated in the reporting, valuation and pricing mechanisms implemented by GEMCO for the mine site. Greenhouse gas generation during construction and operations have been calculated for the Proposal to inform contributions.
The following management hierarchies must be taken into consideration in the design of the proposed action.		Provide comment here
• Environmental decision-making hierarchy	✓	In assessing each impact, the environmental decision-making hierarchy has been applied including siting and design of infrastructure to avoid potential impacts, as well as mitigating potential impacts through the

		construction and operational phases through risk-based decision making and safe-guards.
Waste management hierarchy	✓	The Proposal will manage waste management in accordance with GEMCO's Mining Management Plan (MMP) (now referred to as Deemed Mining Lease) and the waste management hierarchy. Waste management is considered within the Greenhouse Gas Assessment Report for contributions to emissions throughout the Proposal's life cycle.
Other section 43 considerations		
Have communities that may be affected by the proposed action been provided with information and opportunities for consultation?	✓	GEMCO collaborated with the ALC to identify affected stakeholders and deliver engagement activities that provided information about the Proposal and captured stakeholder feedback.
Has consultation with affected communities, including Aboriginal communities' been undertaken in a culturally appropriate manner?	✓	Informed by on-site experience and guided by the ALC, GEMCO employs an engagement approach tailored to the needs of the local community. This includes utilising team members with cultural awareness for engagement activities, developing accessible information tools, and adhering to ALC guidance on the appropriate format and timing for events.
Has community knowledge and understanding (including scientific and traditional knowledge and understanding) of the natural and cultural values of areas that may be impacted by the proposed action been sought and documented?	✓	The engagement activities captured knowledge from Senior Clan members about the values and uses of the areas affected by the Proposal. These were documented and are summarised in section 4 of the Referral Report.
Have Aboriginal values and the rights and interests of Aboriginal communities' been addressed in relation to areas that may be impacted by the proposed action?	✓	GEMCO developed an understanding of the values, rights and interests of Aboriginal people connected to the proposed sites. GEMCO will commence an engagement process that includes negotiations of access agreements with the Traditional Owners for off-lease portions of the Proposal, clearing permits, and other permits, based on the principles of Free, Prior and Informed Consent (FPIC) that recognises the critical decision-making role of Traditional Owners.

How to submit

Email your completed form to Environmental Assessments, Department of Environment, Parks and Water Security at eia.ntepa@nt.gov.au

Further information

For further information, contact Environmental Assessments, Department of Environment, Parks and Water Security (DEPWS) at eia.ntepa@nt.gov.au or phone 08 8924 4218.

Collection notice

Purpose: The purpose for the collection of information using this form is to provide the NT EPA with the relevant information needed to administer the environmental impact assessment process under the *Environment Protection Act 2019*.

Failure to collect information: If the DEPWS does not collect this information, then correspondence will continue to be with the proponent last notified to the NT EPA/Minister and it may have implications in the Minister's consideration of a fit and proper person under s 62 of the Environment Protection Act and environmental approval holder entity/name.

Who is collecting the information: The information is collected by the DEPWS, who provide services to the NT EPA/Minister.

Who to contact for more information: The [DEPWS Privacy Policy](#) sets out how you can access and/or correct your personal information and how you can make a complaint if you feel we have not complied with the [Privacy Act 1988](#).

All enquiries about access, correction or to make a complaint should be directed to the Privacy Officer on (08) 8999 4410 business days, 8.00am - 4.21pm or write to PO Box 496, Palmerston, NT 0831 or email StrategicServices.DEPWS@nt.gov.au