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To Whom it May Concern,

Ammaroo Ammonium Phosphate Fertiliser Project

The Environment Centre NT (ECNT) is the peak community sector environment organisation in the Northern Territory, raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact and supporting community members to participate in decision-making processes and action.

Thank you for the opportunity to provide a comment on the referral under the Environment Protection Act 2019 (NT) of Verdant Minerals Ltd's proposed Ammaroo Ammonium Phosphate Fertiliser Project (**the Proposal**).

ECNT submits that, for the reasons given below, the Proposal requires an environmental approval and should be assessed at the highest level of assessment, an Environmental Impact Statement (EIS). The concerns raised below do not constitute an exhaustive list; ECNT looks forward to engaging further with the Proposal throughout the Environmental Impact Assessment.

Verdant's proposal to vary their existing Ammonia project to include downstream processing and the production of ammonium phosphate fertilisers represents a major shift in the scope and nature of their project. ECNT believes that the potential impacts of the Proposal are not fully addressed in the Referral documents and as such deserve more extended consideration through an EIS.

Compliance with Assessment Report 87 Recommendations

As an initial concern, ECNT notes that there are many recommendations from the 2018 Assessment Report of the original Ammaroo Phosphate Project (Assessment Report 87) that are yet to be complied with, or, at least, of which there are no publicly available reports of Verdant's compliance with. It was recommended, for example, that Verdant establish a "Community Consultation Group with Aboriginal, pastoral, and other relevant stakeholders". To the knowledge of ECNT and other relevant stakeholders who we have approached, there have been no attempts to form such a group. ECNT reiterates the importance of consultation processes that are public, accessible, place-based, and are comprised of a wide range of relevant stakeholders.

A range of recommendations relating to compliance and reporting were put forth in Assessment Report 87. These include the creation of an Acid and Metalliferous Drainage Management Plan and a peer-reviewed Mine Closure Plan. To ECNT's knowledge, these documents are not currently publicly available, and it is unclear whether the recommendations have been fulfilled. It is paramount that the company be required to publicly report on compliance with these recommendations and that the community be informed about developments relating to matters of potentially significant



impact, i.e. Acid and Metalliferous Drainage resulting from the site. ECNT notes that other mines in the Northern Territory, e.g. the Rustlers Roost and Quest 29 Open-cut Mine Redevelopment, have a publicly available Acid and Metalliferous Drainage Management Plan.

The existence of unfulfilled recommendations from an Assessment Report from 2018 does not inspire confidence in the proponent's ability to comply with the highest standards of mining regulation as the project expands, and underlines our calls for the Proposal to be assessed at the most stringent level.

Air quality

The air quality impacts from ammonia processing have the potential to be significant. ECNT is concerned that the potential impacts on human health receive limited treatment in the Referral documents. It is stated that "The hazards associated with the Proposed Project are well understood, and there are appropriate actions and processes in place to ensure they will be fully addressed and managed as part of the MHF licencing process". However, no detail surrounding the "appropriate actions and processes" are given throughout the Referral.

The proponent asserts that "[t]here is no change from the Approved Project in terms of air quality risk impact to human health". Such a statement requires more detailed justification. Due to the documented potential of significant health impacts from processing facilities of the nature proposed for the Amaroo development, including phosphoric acid plant, sulfuric acid plant, ammonia plant, and granulation plant, ECNT believes that greater consideration of human health impacts must be undertaken. Specifically, a health impact assessment should be undertaken by the proponent.

Preliminary concerns held by ECNT include why only levels of particular matter (PM₁₀) and not fine particular matter (PM_{2.5}) are given consideration at the Referral stage. The background air quality baseline has been measured from a site located at the Nolans project, and ECNT questions the appropriateness of a baseline being measured at another mining site.

Greenhouse gas emissions

The use of gas as part of the manufacturing process contributes to the emissions profile of the Proposal being significant, both in the context of the Northern Territory and also Australia's emissions profile. ECNT understands that the Proposal will trigger the need for the proponent to prepare a Greenhouse Gas Abatement Plan under the Territory's Large Emitters Policy.

Current renewable alternatives that have been identified are dismissed as being commercially unviable at this stage, and as a consequence ECNT retains concerns about the ability for this project to be net zero emissions.

Cumulative Impacts

An EIS would provide an opportunity for the cumulative impacts, of e.g. groundwater extraction, of this project and other resource projects in the Barkly region to be assessed.

In summary, there exists knowledge and information gaps, and potential impacts, to the extent that ECNT maintains this project should be assessed at the high level. Additionally, the project should be referred under the Environment Protection Biodiversity Conservation Act 1999 (Cth) (**EPBC Act**) for



consideration as a controlled action, consistent with the 2014 decision regarding the original proposal.

Yours Sincerely,



Naish Gawen

Environment Centre NT