



Northern Territory Environment Protection Authority
Level 1
Arnhemica House
16 Parap Road
PARAP NT 0801

Mode of delivery: eia.consult@nt.gov.au

To Whom it May Concern,

Southern Lease Exploration 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 Groote Eylandt Mining Company Pty Ltd's Southern Lease Exploration Project (Proposal).

ECNT submits that, for the reasons given below, the Proposal requires an environmental approval and should be assessed by way of environmental impact statement. The concerns raised below do not constitute an exhaustive list: ECNT looks forward to engaging further with the Proposal throughout the Environmental Impact Assessment.

The proponent noted that an initial self-assessment concluded that the exploration program has the potential to impact terrestrial ecosystems. The possibility for the presence of the Northern Hopping-mouse (*Notomys Aquilo*) and the Brush-tailed Rabbit-rat (*Conilurus penicillatus*) is of significant concern due to limited distribution of these species and their respective vulnerable and endangered conservation status.

The Northern Hopping-mouse is found only on Groote Eylandt, and key threatening processes include mining, predation by cats and inappropriate fire regimes. Numbers of this species are likely still declining, and it is crucial that their remaining habitat is protected. Any clearing, and associated disturbance activities, may unacceptably impact this species.

Both the Northern Hopping Mouse and Brush-tailed Rabbit rat were listed as one of twenty priorities species by the Australian Government in its 2015 to 2020 Threatened Species Strategy.

ECNT is concerned that conclusions drawn about lack of presence of these species in the project area from studies conducted in 2017 and 2018 during the Small Mammal Research Project. It is not adequate to base this conclusion on surveys conducted 5 and 6 years ago. Moreover, these animals are notoriously difficult to detect and trap in biodiversity surveys. The conclusion cannot satisfactorily be drawn that the Brush-tailed Rabbit Rat nor the Northern Hopping-mouse are found in the project area without undertaking renewed surveys, including at multiple points throughout the year, as species populations may have moved over time. In addition, the activities propose (including drilling) may have impacts such as vibration and dust outside the footprint of the



exploration activities. It is necessary that comprehensive biodiversity surveys be undertaken as part of an environmental impact statement. Plans should also be implemented to check for the presence of the species throughout the course of the activities.

The presence of the Northern Quoll, a critically endangered species and having EPBC Act status, was found in the project area, and ECNT is concerned by the lack of justification as to why it is expected that the population of this species will not be impacted.

Furthermore, ECNT is concerned that health impacts from manganese dust may be generated by exploration activities and that this is not covered in the referral documents. It may be the case that impacts are minimal, however a consideration of the potential for dust from exploration to contribute to the cumulative impacts of dust from the nearby mining activities should be investigated.

Yours Sincerely,

A handwritten signature in blue ink, consisting of a stylized 'K' followed by a long, sweeping horizontal line that curves upwards at the end.

Naish Gawen and Kirsty Howey
Environment Centre NT