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Sent: Thursday, 19 October 2023 6:09 PM
To: eia consult <eia.consult@nt.gov.au>
Subject: NTEPA Consultation - Mount Todd Gold Project Alterations

Your details

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Are you making this submission on behalf of an organisation: No

If yes, please enter the name of the organisation:

Submission contents

Submission details:

The revised proposal includes increased risks which could have a significant impact on the environment, specifically terrestrial ecosystems, inland water environmental quality, aquatic ecosystems, atmospheric processes, community and human health. The NT EPA should require formal assessment by Environmental Impact Statement with public review. Please refer to comments in Attachment 1.

Submission files

1: Comment-on-Mt-Todd.docx, type application/vnd.openxmlformats-officedocument.wordprocessingml.document, 16.2 KB

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Comment on Mt Todd

The increased risk from acid, saline and neutral mine drainage as a result of the additional 109 million tonnes of waste rock to be mined is considered significant and warrants assessment. This has potential implications for terrestrial ecosystems, inland waters, aquatic ecosystems and culture and heritage (in downstream environments). This risk is demonstrated through the existing WRD structure and associated poor quality drainage. It is further noted that the previous assessment found the proponent's waste characterisation to be insufficient with the proponent unwilling to act on the EPA's request for further testing.

The proposal includes a reduction in the size of RP1 on the bases that potentially contaminated water will be pumped to other locations on the site, however no consideration has been given to the risks from reduced storage capacity, potentially increased catchment from the larger footprint WRD, or closure implications from reducing the size of this storage structure, particularly noting that pumping infrastructure will not be operated post-closure.

The proposal includes a 22% increase in direct impact to critical breeding habitat and 2.5% increase in direct impacts to supporting foraging habitat for the Gouldian Finch. The proposal should be assessed under the *EPBC Act*. It should be noted that the proponent indicates the areas calculated for clearing in the Referral Report could increase 20% on the figures presented in the report.

The proposal includes increased greenhouse gas emissions, however the risk has not been quantified in the referral report. Atmospheric processes should be considered a factor and the proponent demonstrate the greenhouse gas risk for the project and their plan to meet net zero by 2050. It should be noted that the Referral Report indicates no plans to mitigate greenhouse gas impacts until it becomes economically viable (Section 3.8.2). This is further demonstrated in Table 8 with justification not meeting the stated objective of net zero by 2050.

The proposal includes the use of reject ore in construction of the TSF, armouring the WRD and potential other areas (as indicated by 'ect.'). However the proponent has not presented any characterisation of this material, or assessment of risk beyond the statement that it is NAF. Given the concerns over previous waste characterisation work by the proponent, the use of this material in external surfaces, and the substantial percentage of PAF and uncertain material in the proposed pit, this material presents a risk to terrestrial ecosystems, inland waters, aquatic ecosystems and culture and heritage (in downstream environments).

It is unclear from the Referral Report if flora and vegetation impacts have been considered in relation to the revised proposal and increased disturbance footprint. It is also unclear if the proponent has surveyed the proposed clearing areas for significant fauna and associated habitat. It should be noted that the clearing area may increase by up to 20% and as such it is unclear where these impacts may occur. This risk relates to Terrestrial Ecosystems.

It should be noted that the Referral Report states discharged water will meet the 95% species protection level, however Table 8 indicates that this quality will be met after mixing in the Edith River. The proponent should ensure information presented to the EPA is clear and consistent.

The proponent has not considered potential risks to amenity of the area, including tourism, the use of the downstream Edith River for recreation, including camping and fishing, abstraction of water from the river for residential and agriculture. While outside the immediate project, poor management of water, discharge and acid, saline and neutral drainage has the potential to impact these aspects in the downstream environment in the long term, particularly given the substantial volume of PAF in the previous project, and the increase in waste rock in the current proposal. This relates to the factor People, in particular in relation to 'Society' and Human Health, as mentioned in Table 8.

The Referral Report has not considered the closure requirements for the project to demonstrate closure of the redesigned infrastructure is feasible/possible. This is particularly relevant for the increased WRD and potential for acid, metalliferous and saline drainage.

The proponent should present the maximum impact from the project rather than providing disclaimers that the actual disturbance may increase by 20% on that presented.

The proponent states that “Rehabilitation of the mine site will occur to make the site safe and stable; however, it has been assumed that habitat values will not fully return to the area due to the long-term presence of the mining landforms.”

Closure and rehabilitation of the site should be targeting broader objectives than ‘safe and stable’. The proponent should be required to provide a closure plan that details the actions that will be undertaken to rehabilitate the site, particularly given the proximity to critical habitat.