

## Submission on the referral

### Verdant Minerals Ltd – Ammaroo Ammonium Phosphate Fertiliser Project

This submission is made under regulation 53 of the Environment Protection Regulations 2020

Government authority: Department of Industry, Tourism and Trade – Mining Operations

| Section of Referral                                | Theme or issue   | Comment  |
|--|------------------|--|
| Referral for Significant Variation – Main Document | Waste Management | <ul style="list-style-type: none"> <li>• Assessment Report 87 indicated tailings from the onsite processing will be temporarily managed in an above ground Tailings Storage Facility ('TSF') until sufficient capacity becomes available in the mined pits for in-pit disposal. The project alteration indicates the TSF is no longer required; however, it is unclear how the proponent proposes to manage the tailings generated while the pits are mined and developed.</li> <li>• The addition of processing plants for onsite production of fertilisers will involve generation of waste streams which were not considered in the original NTEPA assessment. Results of barrel leach tests indicate that the gypsum waste would pose a risk to the surrounding environment if not properly designed and managed. <ul style="list-style-type: none"> <li>○ Subject to the outcome of the NT EPA's consideration of the environmental impacts of this aspect of the project, if an application is made for the project under the <i>Mining Management Act 2001</i> (MMA), details of the environmental management system must be incorporated into the projects Mining Management Plan before it can be approved. Further, under the MMA, any authorisation issued, is likely to include conditions requiring plans for the design and construction of the proposed gypsum stacking area have independent oversight by a suitably qualified person consistent with industry best practice.</li> </ul> </li> <li>• The main infrastructure for the Proposed Project, including the additional fertiliser manufacturing plants and gypsum stacking area, will be constructed within the previously allocated disturbance area. As such, no additional land clearance is required to accommodate this infrastructure. <ul style="list-style-type: none"> <li>○ The additional proposed plants/infrastructure can be managed under the MMA, providing the management systems to accommodate the proposed new infrastructure do not increase the level of environmental risk.</li> </ul> </li> </ul> |