

Referral submission template for government authorities

Finniss Lithium Project BP33 Underground Mine

Core Lithium Limited

This template is provided for use by government authorities making a submission on an accepted referral for consideration under section 48 of the *Environment Protection Act 2019*. Additional comments may be attached separately if required.

At this initial stage of the environmental impact assessment process, feedback is sought on whether or not the NT EPA should assess the proposal and, if so, what level of assessment is considered appropriate.

Referral Submission Template	
Agency Name:	Department of Primary Industry and Resources (DPIR)
Proponent and Action: (NT EPA to complete)	
Does the action require a statutory approval/ licence/ permit under legislation administered by your agency? If so, please list and/or explain.	Under the <i>Mining Management Act 2001</i> (MMA) the project requires an Authorisation.
Does the proposed action meet relevant legislation, accepted standards, plans or policies administered by your agency? Please explain.	DPIR acknowledges that geochemical investigations and ground water studies are ongoing. Should these studies and relevant mitigation measures confirm the low environmental risk of the proposed development, DPIR anticipates that the proposal can be managed under the MMA.
Future involvement of the agency if the action proceeds through environmental impact assessment: <ul style="list-style-type: none"> No further involvement Provide for information only Provide for advice 	Provide for advice.
Has your agency had prior dealings with the proponent? If so, is there knowledge of the proponent's compliance (or non-compliance) with approvals and legislation?	BP33 relates to the recently authorised Grants Lithium Project, operated by Lithium Developments (Grants NT) Pty Ltd. Works are yet to commence at the Grants Lithium Project.

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Does the referral provide adequate information for your agency to provide comment on the action?	Yes
Does the referral provide adequate information of surrounding land uses and other potential pressures on the environment?	This proposal is an underground development which relates to the currently Authorised Grants Lithium Project which has been formally assessed through the EIS process.
Does the referral present an adequate level of information of the environment likely to be impacted?	Yes, pending ongoing studies on waste rock characterisation, water balance, groundwater quality and dam design, see DPIR comments below.
Have all environmental factors with the potential to be significantly impacted by the action been identified in the referral?	Yes, pending ongoing studies on waste rock characterisation, water balance, groundwater quality and dam design, see DPIR comments below.
Is the referral accurate in its preliminary identification and assessment of likely significant impacts?	Yes, pending ongoing studies on waste rock characterisation, water balance, groundwater quality and dam design, see DPIR comments below.
Are the claims and findings of the referral supported by adequate information?	Yes
Has the referral provided information to support any assumptions/ conclusions made about the cultural and social environments that may be impacted by the action?	No comment as this is outside DPIR remit
Does the referral provide adequate information to demonstrate claims about opportunities and impacts to the NT economic environment?	No comment as this is outside DPIR remit
Does your agency have additional information about the locality, action or circumstances of the action that has not been provided in the referral that will contribute to the NT EPA's decision on significant impact?	No
Does the action have the potential for significant impact on the environment?	This is an issue for the NT EPA to determine
If yes, can the action be assessed based on the information in the referral?	Yes, with further studies required to develop appropriate management strategies, see below DPIR comment.
If no, should the action be assessed as a SER, EIS or by assessment by inquiry?	N/A
If an SER is recommended please describe the matter that the proponent is required to further investigate	This level of assessment is not recommended as the proposal can be managed under the MMA in conjunction with the existing approval for the Grants Lithium Project.
If an EIS is recommended, please describe the matters the proponent is required to further investigate (to be included in draft terms of reference for the EIS)	This level of assessment is not recommended as the proposal can be managed under the MMA in conjunction with the existing approval for the Grants Lithium Project.

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If an assessment by inquiry is recommended, please describe the issue to be examined by the inquiry (for inclusion in draft terms of reference)

This level of assessment is not recommended as the proposal can be managed under the MMA in conjunction with the existing approval for the Grants Lithium Project.

DPIR Comment – Finniss Lithium Project BP33 Underground Mine – Referral - Core Lithium Limited**DPIR Comments**

The Department of Primary Industry and Resources (DPIR) has reviewed the updated Notice of Intent (NOI) for the Finniss Lithium Project BP33 Underground Mine circulated on Friday 10 July 2020. DPIR acknowledges that geochemical investigations and ground water studies are ongoing. Should these studies and relevant mitigation measures confirm the low environmental risk of the proposed development, DPIR anticipates that the proposal can be managed under the *Mining Management Act 2001* (the MMA).

1. Waste Rock Characterisations

The referral outlines that little to no potentially acid forming (PAF) material will be generated by the mining operation, however it acknowledges that there is some uncertainty around the acid generating properties of fresh waste rock samples with higher sulphur content (>0.2% S). The referral describes further geochemical studies to confirm preliminary findings and allow better assessment of the suitability of the proposed waste rock management systems. Should these studies reveal a higher likelihood of PAF occurring, DPIR still considers the risks to the environment under the proposal can be effectively managed under the MMA, provided appropriate management systems are in place.

2. Water Balance

The proponent has identified that adequate water resources are available for the BP33 development on the basis that mining of both BP33 and Grants deposit does not occur concurrently. However, should circumstances, such as changing market conditions encourage the mine operator to develop both deposits concurrently, the adequacy of the water balance may need to be evaluated to ensure sufficient water resources are available. DENR Water Resources is best placed to provide comment on the possible individual and possible cumulative impacts on the water resources.

3. Groundwater

To better determine potential risks to groundwater, the proponent has committed to undertake further hydrogeological investigations. The proponent has identified a number of additional locations for hydrogeological investigation, the majority of which are located in the proposed box-cut area. The groundwater investigations also need to include the proposed run of mine (ROM) and waste rock dump (WRD) areas, to capture baseline information for development of the Water Management Plan.

4. Dam designs

The referral outlines construction of various dams within the mine footprint and the use of existing dams at other sites. DPIR considers the risks of significant impacts to the environment to be low. Note, prior to any approvals issued under the MMA, DPIR will require dam designs to be compliant with ANCOLD (2012) guidelines and address matters including, but not limited to:

- Suitability of the dam construction material;
- Appropriateness of the design with respect to potential failure models;
- Appropriate risk assessment for all risks and associated mitigation measures; and
- Proposed management systems for the safe operation and maintenance of the dams e.g. independent audits.