Submission on referral information

Lithium Plus Minerals Ltd – Lei Lithium Project

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

NT EPA reference number: EP2024/038

Government authority: Aboriginal Areas Protection Authority (AAPA)

Theme / issue	Comment
Main report Table 4.2 Pg 34	• The table states that a search of AAPA records did not identify any recorded or registered Aboriginal sacred sites on MLA33874. • The proponent has not applied for an Authority Certificate. There are no previous Authority Certificates relevant to these works across the project area.
Main report 4.2.3 Pg 38-39	• The environmental plans, such as the erosion and sediment control plan and water management plan, should ensure that no pollution occurs to the Charlotte River. Bynoe harbour contains numerous Aboriginal sacred sites including beaches, islands, and reefs. • It is not known whether the Charlotte River area contains Aboriginal sacred sites.
Main report Figure 5-2 Pg 58 Figure 5-4 Pg 84	• The sediment dams in the south west of the project area are shown to be within the drainage system and the modelled flood extent. • Failure of this structure under flood conditions may lead to pollution of the Charlotte River and Bynoe harbour. • Bynoe harbour contains numerous Aboriginal sacred sites including beaches, islands, and reefs. It is not known whether the Charlotte River area contains sacred sites.
Main report 5.3.1 Pg 85 Appendix H Table 2-5 Pg 14	• The groundwater investigation has determined that the depth to groundwater is within 15m, and within 10m across much of the area. • There is potential for groundwater dependent tree species in the project area. Such trees may be Aboriginal sacred sites; however, it is not known whether any such sites are present in the project area. • There is an upward hydraulic gradient from the main bedrock aquifer to the shallow bedrock. • Dewatering the main aquifer for underground mining has the potential to drain shallow aquifers, lowering groundwater levels, impacting groundwater dependent features.
Main report 5.3.2 Pg 86-87	• The proponent recognises that dewatering of mine pits or underground workings may threaten groundwater dependent ecosystems. • The proponent has not yet assessed this risk and states that '*a site-specific groundwater model will be developed*'. • The absence of modelling of the impact to groundwater levels means that the assessment of the Hydrological Processes factor and consequently, the Culture and Heritage factor, is incomplete.
Main report 5.7.1 Pg 103	• The proponent states that the assessment of impacts on culture and heritage is based on a review of AAPA records. There are no previous Authority Certificates relevant to these works across the project area.

	• The information required for demonstrating avoidance / minimisation of impacts on Aboriginal sacred sites is: 1) evidence of obtaining an Authority Certificate that covers the proposed works and use of land, in accordance with the Northern Territory Aboriginal Sacred Sites Act 1989; and 2) a commitment to comply with the conditions of the Authority Certificate. • Obtaining and adhering to an Authority Certificate is the appropriate mechanism to avoid and mitigate impacts to sacred sites.