

Submission on Draft environmental impact statement (EIS)

PNX Metals Limited – Fountain Head Gold Project

This submission is made under clause 9(2)(b) of the Environmental Assessment Administrative Procedures 1984

Government authority: Aboriginal Areas Protection Authority

Section of Draft EIS	Theme / issue	Comment
Section 2.2.10	Regulatory requirements – sacred sites	<p>The Authority confirms that PNX Metals was issued an Authority Certificate (C2021/019) (the Certificate) on 24 March 2021. The process of issuing this certificate involved consultation with custodians and did identify sacred sites nearby and downstream of (but not within) the Project Area as illustrated in Figure 3.2.</p> <p>The Authority clarifies that this Certificate does not protect all intangible cultural heritage.</p> <p>To protect sacred sites in accordance with the <i>Northern Territory Aboriginal Sacred Sites Act 1989</i>, PNX Metals must comply with the conditions of the Certificate. These include conditions for reporting to the Authority on accidental release or detection of contaminants in a waterway.</p>
Section 4.10.2	Existing cultural values – Sacred sites	<p>The text mentions two recorded sacred sites located ~2km north of the Project area (noting these are not shown on Figure 4.28). The Authority clarifies that these two are located ~550m and 1.3km north of the boundary of the Project area. One of these contains a waterhole on a tributary of the upper Margaret River which is on a direct downstream flow path from the proposed mining activities, by about 2km.</p>
Section 7.10	Potential impacts to sacred sites	<p>This section does not address potential impacts to sacred sites as requested in the Terms of Reference. Other sections of the draft EIS acknowledge that sacred sites occur nearby. As noted above, one nearby sacred site is water-related and is directly downstream from the proposed activities.</p> <p>The Authority considers there is potential for biophysical impact on this sacred site from changes to water quality or hydrological processes that could result from the proposed activities.</p> <p>The Authority suggests that PNX Metals provide details on measures to be undertaken to avoid such impacts on this sacred site.</p>