

Submission on Draft environmental impact statement (EIS)

PNX Metals Limited – Fountain Head Gold Project – Attachment A

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

Government authority: Department of Industry, Tourism and Trade, Mines Branch

Summary: The Mines Branch has reviewed the Fountain Head EIS and, with the exception of the below comments, considers the EIS adequately addresses potential environmental impacts and risks, details appropriate management measures and includes adequate baseline studies.

Section of referral or terms of reference	Theme / issue	Comment
Appendix 5 – Soil Infiltration and Solute Fate Assessment	The EIS states; “Detailed assessment of the solute concentrations of the Pit Lake, once PAF material is added at the end of mining, has not been conducted to date, but is expected to be the primary driver of pit lake water chemistry with respect to contaminants of concern”.	Modelling of pit lake water quality should be undertaken to enable development of appropriate management systems.
Appendix 6 – Geochemical Characterisation of Waste Rock and Ore	The AMD assessment indicates that, with further testing to improve statistics, NAF material in the WRS is geochemically suitable for use in onsite construction.	<p>The AMD assessment details that existing waste rock material on the Waste Rock Storage (WRS) is problematic if not appropriately managed. It is not clear if the WRS is oxide material only, or a mixture of both fresh and oxide material. Clear evidence of sulphides, which lead to AMD generation, have been observed; however, it is noted that no significant environmental impacts have been observed to date. These observations may be a result of partially decomposed rock having produced sufficient clay and adsorbent minerals to buffer AMD.</p> <p>The use of WRS material in construction requires further consideration given the potential acid load stored from partially oxidised sulphides. In addition, the existing WRS rock may not be suitable for reuse in ultimate rehabilitation (e.g. capping of the WRS) and should be carefully considered.</p>