

## 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 <b>Certificate</b>) 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>

Ms Kylie Fitzpatrick  
Department of Environment, Parks and Water Security  
PO Box 3675  
Parap NT 0801

Dear Ms Fitzpatrick *Kylie*

**Re: draft EIS - PNX Metals Limited Fountain Head Gold Project**

The Department of Environment, Parks and Water Security has assessed the information contained in the above EIS supplement and provides the following comments:

**Environment Division**

**Environmental Authorisations Unit**

The proponent has indicated in the draft EIS that PNX does not intend to discharge wastewater offsite and therefore do not plan on obtaining a waste discharge licence (WDL). All wastewater is planned to either be recycled e.g., through the process plant or retained on site within water storage areas such as the evaporation pond. Runoff (ANZECC/ARMCANZ (2000) compliant) from sediment dams around bunded hardstand areas and the IWL will be diverted to the Fountain Head Lake catchment or the evaporation pond catchment prior to release offsite.

Should the proponent change plans and require waste discharge then a WDL will be required. The proponent should allow sufficient time for the application to be assessed and approved by the Controller of Water Resources. Assessment and application timeframes can be up to 60 business days and are dependent on the adequacy of the information provided.

**Environmental Operations Unit**

Section of referral or terms of reference	Theme / issue	Comment
Air Quality Appendix 1 and Evaporator Emissions Study Appendix 27	Air	The proponent's air quality assessment for the development was conducted by estimating emissions of key pollutants from the development and comparing these to the emission rates and air dispersion modelling results for a mining operation at Mount Todd gold mine (100km south east).

Section of referral or terms of reference	Theme / issue	Comment
		<p>This approach is not acceptable and, as the proponent noted, the spatial distribution of emission sources at the Mount Todd Gold Mine will differ from the development, which may impact offsite concentrations of pollutants.</p> <p>The proponent must assess the likely air quality impacts of the development, including cumulative impacts where relevant, in accordance with the Approved Methods and Guidance for the Modelling and Assessment of Air Pollutants in NSW (NSW Approved Modelling Methods). A Level 2 impact assessment should be conducted taking into consideration the characteristics of the receiving environment (including topology and meteorology).</p> <p>All processes that could result in air emissions must be identified and emissions modelled. Emission sources to be considered should include, but not be limited to:</p> <ul style="list-style-type: none"> <li>• fugitive sources of particulate matter, such as material handling and processing activities, movement of mobile plant and equipment, and wind erosion of exposed surfaces;</li> <li>• fugitive releases from the ore processing circuit and surface of the Tailings Storage Facility (TSF);</li> <li>• combustion sources, such as exhaust emissions from site equipment fleet, emergency generator and processing plant and blasting operations; and</li> <li>• emissions from any mine vents, furnaces, or kilns or storage vessels used at the facility.</li> </ul> <p>In addition to modelling the concentrations of TSP, PM10, PM2.5, and hydrogen cyanide, the following parameters must be modelled if emitted at the facility: NO2, SO2, CO, VOCs, metals and metalloids.</p> <p>Results must be presented as a table and as contours against impact assessment criteria, including the 1-hour hydrogen cyanide assessment criterion.</p> <p>The proponent must demonstrate that source emissions at the development comply with relevant concentration limits specified in the Protection of the Environment Operations (Clean Air) Regulation 2010 (NSW).</p> <p>In addition to dust mitigation measures presented in the assessment, the proponent must provide detailed emission control techniques and practices that will be employed for other pollutants.</p> <p><u>Electric Evaporators</u> Three electric evaporators (Minetek Evaporating Systems) will be used for dewatering operations and the proponent has employed a Gaussian Diffusion and Sedimentation (GDS) model to show that</p>

Section of referral or terms of reference	Theme / issue	Comment
		<p>arsenic emissions from the Minetek evaporators will be within compliance limits at three receptor sites. Arsenic was modelled as the drift of droplets that evaporate to dryness as PM10 and PM2.5.</p> <p>This is not a standard model to be used for compliance assessment. The proponent must explain why models specified in the NSW Approved Modelling Methods could not be used to assess emissions from the evaporators.</p> <p>The proponent should also note that impact assessment criteria (IAC) of principal toxic air pollutants such as hydrogen cyanide and arsenic (listed in the NSW Approved Modelling Methods) are applied at and beyond the boundary of the facility. This is in contrast to IAC of other pollutants such as criteria pollutants, which are applied at selected offsite receptors.</p> <p>The proponent should either (i) employ the services of an independent third party to review the use of the GDS model for assessing the emissions from the evaporators, or (ii) include the evaporator emissions as stationary point sources and model all emissions from the development using an approved air dispersion model.</p>
Greenhouse Gas Assessment Appendix 1	Atmospheric processes	<p>The proponent has shown that the facility will have National Greenhouse and Energy Reporting (NGER) scheme reporting obligations associated with the development, nominally commencing in Year 1 of the project schedule.</p>
		<p>The proponent should also note the facility is likely to trigger National Pollutant Inventory (NPI) reporting.</p>
Environmental Noise Assessment Appendix 2	Human health	<p>The proponent has appropriately assessed the likely operational noise impact of the development (including construction noise) in accordance with the NT Noise Management Framework Guideline.</p> <p>The assessment model included the road noise impact of the development and the blasting impacts of the development, having regard to the relevant ANZECC guidelines.</p> <p>The proponent must verify that noise emitted from the evaporating units has been included in the model.</p>

## Water Resources Division

### Groundwater

Section: 9 Environmental Management, Monitoring and Reporting (Table 9-2)

Issue: The proponent has advised that their intended monitoring procedure for groundwater drawdown and mounding will be based on complaints from existing users and no surface expression of groundwater or waterlogging of soils respectively. These indicators, if they were to occur, suggest that that the

proponent's modelling has failed significantly and that they have failed to mitigate potential impacts. Rather than relying on impacts being reported or observed at the surface, the proponent should actively align their monitoring program to assess whether their modelled scenarios are occurring as predicted. If significant deviation from modelled scenarios occur, re-evaluation of the model (i.e., re-calibrated with observational data and hydraulic parameters changed accordingly) should be prompted.

Recommendation: The proponent should propose a monitoring plan for groundwater quantity that does not rely on complaints from existing users or visual signs of impact. Instead they should base the monitoring plan on ensuring that the minimal impact suggested by their modelling progresses as predicted. An example would be to set drawdown and mounding triggers (based on the modelling results) for monitoring bores located at varying distances (e.g. 500m and 1km, or as appropriate) down-gradient of the likely propagation of drawdown and mounding impacts, and propose a plan for if those triggers are breached (i.e. review of modelling, re-evaluation of risk assessment). The Water Management Plan indicates that a series of bores around the project area are planned to be monitored biannually for standing water level, so the suggestion above should not be too onerous to include in their monitoring plan.

## **Mining and Petroleum**

### Mine pit and evaporation pond water - Extraction

The draft EIS indicates that surface water will be extracted from an existing pit (Fountain Head Pit) and evaporation ponds for construction and process water for mining operations. The EIS states that advice was provided by DEPWS in June 2019 that a surface water extraction licence would not be required for dewatering of the mine pit. It is the current position of DEPWS at the time of this review of the EIS that extraction of water from the mine pit and evaporation pond does trigger licence requirements under section 45 of the *Water Act 1992*.

Recommendation: Extraction of surface water from mine pits or onsite dams requires a surface water extraction licence (SWEL) under section 45 of the *Water Act 1992*. The proponent must apply for a SWEL prior to commencement of extraction from the mine pit or evaporation pond. In applying for a SWEL the proponent must document the estimated water use in mega litres (ML) per month for each beneficial use and extraction point. An application for a SWEL should be lodged at least three to four months prior to commencing extraction for the SWEL to be processed by DEPWS.

### Fountain Head Lake - extraction

The EIS documents that potable water may be sourced from the historical 'Fountain Head Lake' (a manmade surface water feature comprised a void space remaining from historical alluvial mining with downstream haulage road acting as a dam). Based on information provided in the EIS, DEPWS considers that Fountain Head Lake meets the definition of a waterway under section 4 of the *Water Act 1992*. The proponent will therefore require a SWEL to take water from Fountain Head Lake under section 45 of the Act.

Recommendation: Should the proponent choose to extract water from Fountain Head Lake, an application for a SWEL must be lodged. The proponent should allow at least three to four months for the SWEL to be determined by the Controller of Water Resources.

### Fountain Head Lake - interference with a waterway

The EIS identifies that Fountain Head Lake has been created by damming of the unnamed stream by an historical haulage road to the north. While the existing disruption to the waterway does not require authorisation under the *Water Act 1992*, any future modification to site infrastructure which alters the current water regime may trigger a requirement for a permit to interfere with a waterway under section 41 of the *Water Act 1992*.

Recommendation: Prior to commencement of construction works which may alter the flow regime of Fountain Head Lake, project specific advice about permit requirements should be sought from the Water Resources Division. Further information on permit requirements for interference with a waterway is available in the DEPWS fact sheet Mining and Petroleum Activities: Interfering with a Waterway.

### Planning and Engagement

The proposed development is not within a water control district and is not subject to a water allocation plan.

The mine is in the Mary River Beneficial uses area (NT Gazette G6, 13 February 2022). The beneficial uses are environment, riparian and cultural for surface water and environment, riparian and agriculture for groundwater. The EIS should demonstrate how the water quality objectives are being met and the risks are being managed. The EIS and Appendix 16 Water Management Plan do not specifically identify how the beneficial use and water quality objectives are going to be met.

### Flora and Fauna Division

Section of EIS	Theme / issue	Comment
Section 4.7 of the EIS Appendix 8 (Flora and Fauna Survey Report)	Terrestrial Ecosystems	The mine is a legacy site with most of the site disturbed historically and with limited habitat for threatened species. The Flora and Fauna Division has reviewed the results of terrestrial flora and fauna surveys provided with the EIS and is satisfied that the risk to threatened species and biodiversity is low.
		While the risks are considered low, the Division acknowledges the recommendation in Appendix 8 to undertake a site walkover to identify any <i>Acacia praetermissa</i> and <i>Styloidium ensatum</i> . Appropriate survey times for <i>Styloidium ensatum</i> are during the mid-late Dry season when the plant is flowering/fruitletting. <i>Acacia praetermissa</i> can be surveyed at any time of year.
Appendix 9 (Aquatic Baseline Characterisation Report)	Aquatic Ecosystems	The EIS presents data from three of the seven sites reported in Appendix 9. If the data in the EIS is to characterise the baseline state, why weren't all sites from Appendix 9 included? In addition, the EIS has not provided any reason or rationale for the selection of the sites beyond that they are relevant to the project area and the objectives of the sampling program are unclear.
		The study objectives (page 1-2 of Appendix 9) include (i) baseline characterisation, and (ii) identification of sensitive habitats and fauna species.  An adequate baseline characterisation requires greater sampling effort across environmental gradients, including the types of stream habitats and across the degree of exposure to impacts from previous mining.  Seven sites is likely minimally sufficient to achieve this objective, and three sites falls well short of achieving the objective. An adequate baseline characterisation would also require a level of taxonomic resolution (ideally to species-level) that is not provided here.

	<p>Surveys of fish, decapod crustaceans and macroinvertebrates were undertaken in April 2019 at sites on intermittent streams. While the timing of sampling may be adequate to detect most fish species, it is probably not adequate to detect many aquatic invertebrate species which may have been present in the preceding months of the Wet season, and it is most likely that invertebrate sampling during April will reveal a fauna characteristic of declining water quality, dominated by air-breathing water beetles and water bugs.</p> <p>The fish sampling was undertaken using a variety of methods and revealed a set of species common and widespread in streams of northern Australia. Sampling effort per site appears to be high.</p>
Section 4.8.4 of the EIS	<p>The analysis of macroinvertebrate assemblages appears to be limited. The EIS (page 4-80) reports an analysis of 202 individuals across three sites. It should be noted that standardised AUSRIVAS sampling specifies 200 randomly selected individuals per sample.</p> <p>Although the data is not presented in the EIS, most taxa seem to have been identified to family level only ('A total of 202 individuals from at least 11 orders, 22 families and 26 taxa were identified'). The results of the baseline characterisation appear to underrepresent the aquatic biodiversity of these streams. For example, streams in the Darwin area contain about 100 species of Chironomidae, &gt;70 species of Trichoptera, at least 10 species of Ephemeroptera. (In this EIS, taxa richness values per site were reported as 9, 13 and 15).</p>
Section 4.8.4.1 of the EIS	<p>The decapod section (4.8.4.1) includes discussion of a freshwater crab species (<i>Varana litterata</i>). Staff in the Division are not familiar with this species and suspect it may be a misidentification.</p>

It is recommended that:

- More information is required on the rationale for site selection for the baseline characterisation, and justification of why data from only three sites is adequate to meet stated objective for both fish and macroinvertebrates
- Biological monitoring, if undertaken in the future, will require more sites, and an hypothesis-testing framework that is structured to detect impact on or declines in aquatic health.

#### Rangelands Division

#### **Weeds Management Branch**

An assessment of the NT Weeds Database for the site, surrounding areas and adjoining roads revealed historic data records of the following declared weed species:

Common Name	Botanical Name	Declared
chinee apple	<i>Ziziphus mauritiana</i>	Class A
Devil's claw	<i>Martynia annua</i>	Class A
gamba grass	<i>Andropogon gayanus</i>	Class B
grader grass	<i>Themeda quadrivalvis</i>	Class B
hyptis	<i>Hyptis suaveolens</i>	Class B

Common Name	Botanical Name	Declared
mimosa	<i>Mimosa pigra</i>	Class B
physic nut	<i>Jatropha curcas</i>	Class B
mission grass - perennial	<i>Cenchrus polystachios</i>	Class B
senna - candle bush	<i>Senna alata</i>	Class B
senna - coffee	<i>Senna occidentalis</i>	Class B
senna - sicklepod	<i>Senna obtusifolia</i>	Class B
sida - flannel weed	<i>Sida cordifolia</i>	Class B
sida - spiny head	<i>Sida acuta</i>	Class B
snake weed sp	<i>Stachytarpheta sp</i>	Class B

The *Weeds Management Act 2001* (the Act) enables the following weed declarations: Class A (to be eradicated); Class B (growth and spread to be controlled); and Class C (not to be introduced into the NT). All Class A and B weeds are also Class C.

All land in the Northern Territory is subject to the Act. Section 9 of the Act states that the owner and occupier of land must (a) take all reasonable measures to prevent the land being infested with a declared weed; and (b) take all reasonable measures to prevent a declared weed or potential weed on the land spreading to other land.

Of the listed species, gamba grass and grader grass are noted to occur on the lease area and are both subject to Statutory Weed Management Plans. Gamba grass and mission grass is identified as part of the listed key threatening process 'Invasion of northern Australia by Gamba Grass and other introduced grasses'.

Previous extractive operations on the site have introduced and exacerbated the spread of declared weed species within the property. These weeds continue to have an impact on the landscape and production values of the surrounding pastoral leases.

The following matters should be addressed in the EIS

- *Andropogon gayanus*, *Cenchrus polystachios*, *Cenchrus pedicellatus* are identified as components of the Key Threatening Process 'Invasion of northern Australia by Gamba Grass and other introduced grasses' listed under the *Environment Protection and Biodiversity Conservation Act 1999*.
- There is a high likelihood of mission grasses (*Cenchrus polystachios* and *Cenchrus pedicellatus*) will be detected on the site due to known close proximity to the site.
- There is a widely recognised link between gamba grass density and the (in)ability to control wildfire and mitigate fire impacts. Other high biomass tropical grasses, including grader grass and mission grass also increase fuel loads.
- Tropical grasses identified in the Key Threatening Process 'Invasion of northern Australia by Gamba Grass and other introduced grasses' will present challenges to mitigation strategies offered for rehabilitation failure, terrestrial ecology impact, and uncontrolled fire. An adequate strategy to overcome those challenges with existing levels of gamba grass is not described in the draft EIS.
- There is a general obligation under the *Weeds Management Act 2001* to control weeds on land, this would extend to reasonable steps to contain or control seed production and spread from densely infested areas.

### Recommendations

In addition to measures identified in the EIS, the following items should be addressed to demonstrate how existing dense gamba grass on the site will be controlled/managed:

- The Weed Management Plan and the Bushfire Management Plan should be integrated to address fuel load problems associated with existing dense gamba grass.

- The Weed Management Plan should include measures to reduce seed spread from existing dense gamba grass stands, particularly the implementation of buffers to reduce spread offsite, or into rehabilitation areas and stockpiles.
- There are requirements for landholders of the underlying tenure (NT Portion 695) under the statutory management plan. These requirements should be considered as part of the Weed Management Plan. It is recommended that Section 8 of the EIS (Ecologically Sustainable Development) include the requirements of the Statutory Weed Management Plan for gamba grass. It would also be beneficial to consider the Key Threatening Process 'Invasion of northern Australia by Gamba Grass and other introduced grasses' in as part of the Weed Management Plan.

Further information about management requirements and copies of the Weed Management Plans for gamba grass, grader grass, mimosa and neem are available at:

<https://nt.gov.au/environment/weeds/weed-management-planning>. Alternatively contact the Weed Management Branch for further advice on (08) 8999 4567.

Should you have any further queries regarding these comments, please contact Maria Wauchope by email [maria.wauchope@nt.gov.au](mailto:maria.wauchope@nt.gov.au) or phone (08) 8999 3692.

Yours sincerely



Luis Da Rocha  
Executive Director, Rangelands

6 August 2021

## 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:** NT Health, Centre for Disease Control Division – Medical Entomology section.

**Summary:** The NT, particularly the Top End, is subject to endemic mosquito borne disease transmission, with rural areas nearby to wetlands considered to have a higher risk of mosquito borne disease transmission than urban residential areas. Mine sites have the potential to increase mosquito populations via the creation of shallow water bodies or diversion of creeklines, and there also appears to be legacy areas of shallow water ponding which may have increased mosquito populations at the mine site. Medical Entomology has a [Personal protection from mosquitoes and biting midges handout](#) and [Guidelines for preventing mosquito breeding associated with mining sites handout](#) to assist mine sites with protecting their staff and prevent the creation of further mosquito breeding sites.

Section of referral or terms of reference	Theme / issue	Comment
Terms of Reference	Human Health	<ul style="list-style-type: none"> <li>Due to the short life span of this mining operation, a baseline mosquito investigation is not required.</li> <li>Measures that will be taken to reduce the impact of mosquitoes, and minimise the potential to create new mosquito breeding sites, should be outlined in a mosquito management section in the Human Health section of the EIS. Guidance can be found in the Medical Entomology <a href="#">Personal protection from mosquitoes and biting midges handout</a> and <a href="#">Guidelines for preventing mosquito breeding associated with mining sites handout</a>.</li> <li>If required, the proponent can contact Medical Entomology directly for advice.</li> </ul>
		Add extra rows as required
		Add extra rows as required
		Add extra rows as required

## 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>

## 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:** Department of Industry, Tourism and Trade – Tourism Division

Section of referral or terms of reference	Theme / issue	Comment
<b>Section 4.4.7</b>	Project location	<ul style="list-style-type: none"> <li>• The NOI outlines that the majority of material to be mined from the project pit will require blasting (section 1.4.7).</li> <li>• The Adelaide to Darwin railway line is located only 540 metres to the south of the operation, with passenger services passing through at varying times during the day and night. Tourism NT notes the proponent will adopt a zero-ejection policy for flying rock emitted from the pit addressing direct contact incidents, however air blast and ground vibrations may also impact operations of the Ghan Passenger rail service.</li> <li>• Further detail is required to what information is currently provided ‘Blasting will take place in daylight hours only and preferably during meal or shift breaks.’</li> </ul>
<b>Section 4.10</b>	Impacted stakeholders	<ul style="list-style-type: none"> <li>• Tourism NT requests the below stakeholders be advised of blasting activity and provided a project timeline outlining exact timings of blasts – noting mining activity is scheduled to commence Q1 2021. <ul style="list-style-type: none"> <li>○ The Ghan, Journey Beyond</li> <li>○ Emerald Springs Roadhouse (soon to undertake \$120,000 upgrades through the NTG’s Roadhouse to Recovery Fund)</li> <li>○ Pine Creek Railway Resort</li> <li>○ Lazy Lizard Caravan Park.</li> </ul> </li> </ul>
<b>Section 4.4.2</b>	Noise	<ul style="list-style-type: none"> <li>• It is noted that ‘the operation will operate 24 hours per day 365 days per year’ with noise ‘generated from the mining fleet, blasting and crushing’. Tourism notes the greatest noise generation is to be from reversing equipment machinery during crushing operations during 12 hour day shifts, with the consequence/significance without controls being moderate to neighbours.</li> <li>• The proponent has conducted a noise assessment and will ensure noise levels do not exceed the NT Noise Management Framework Guideline, however Tourism NT requests suggested stakeholders be notified of potential impacts.</li> </ul>

Environmental impact assessment under the *Environment Assessment Act 1982*  
with transitional matters from the *Environment Protection Act 2019*

Section of referral or terms of reference	Theme / issue	Comment
<b>Section 4.5.2</b>	Transport	<ul style="list-style-type: none"><li>• With the level of information provided, Tourism NT is unable to assess transport/access impacts to tourists travelling by rail and car as a result of project activity.</li><li>• Current detail provided lists 'increased traffic as a result of project vehicles' with the likelihood of disruption of traffic listed as virtually certain with a high significance.</li><li>• Without the inclusion of a traffic impact plan Tourism NT is unable to determine risks to visitors travelling by road or potential for road accidents to occur.</li><li>• A project timeline for the construction of the gold processing plant and supporting infrastructure i.e. workshops, power station, roads, offices etc is also not provided.</li></ul>
<b>Section 4.8.2</b>	Social impacts	<ul style="list-style-type: none"><li>• Tourism NT can help facilitate arrangements for short term accommodation for the 70 person workforce should assistance be required, noting there are a number of accommodation providers within an hour travel time of the project area.</li></ul>

---

**From:** Dianne Bensley  
**Sent:** Thursday, 8 July 2021 3:56 PM  
**To:** eia NTEPA  
**Subject:** FW: Invite to comment - PNX Limited Fountain Head Gold Project - Draft EIS  
(comments requested by 26 July 2021)

**Categories:** Roland

Good afternoon,

I have reviewed the Invite to comment for the PNX Limited Fountain Head Gold Project - Draft EIS and can confirm that all heritage and archaeological issues have been addressed for this project. Rather extensive archaeological surveys have been conducted for the project and associated recommendations made for each of the sites in question. The Cultural Heritage Management Plan has been included in the Draft EIS. The proponent may have to apply for permission to disturb some sites that cannot be avoided by the project and we will wait to hear further about that in due course.

Heritage Branch has no further concerns with this project for the time being.

Regards,  
Di

**Dianne Bensley**

Senior Heritage Officer, Heritage Branch  
Territory Families, Housing and Communities

Floor 1, JHV2- Jape Home Maker Village, 356 Bagot Road, Millner  
PO Box 37037 Winnellie NT 0821

t. 08 8999 5051  
w. [fhc.nt.gov.au](http://fhc.nt.gov.au)



I acknowledge Aboriginal people as the Traditional Owners of the country I work on, and their connection to land and community. I pay my respect to all Traditional Owners, and to the Elders both past and present.



TERRITORY FAMILIES,  
HOUSING AND COMMUNITIES

Use or transmittal of the information in this email other than for authorised NT Government business purposes may constitute misconduct under the NT Public Sector Code of Conduct and could potentially be an offence under the NT Criminal Code. If you are not the intended recipient, any use, disclosure or copying of this message or any attachments is unauthorised. If you have received this document in error, please advise the sender and delete the email. No representation is given that attached files are free from viruses or other defects. Scanning for viruses is recommended.

---

**From:** Secretariat PFES  
**Sent:** Tuesday, 20 July 2021 11:14 AM  
**To:** eia NTEPA  
**Cc:** Secretariat PFES; Emma Suradi  
**Subject:** \*\*NTPFES Comment\*\* Invite to comment - PNX Limited Fountain Head Gold Project - Draft EIS (comments requested by 26 July 2021)

**Follow Up Flag:** Follow up  
**Flag Status:** Completed

**Categories:** Roland

Good afternoon Kylie,

In response to the below request, please refer to the following advice:

- The remote location of the operations (outside of our ERA) means that the Northern Territory Fire Rescue Service (NTFRS) may not have an ability to respond to an emergency in a timely manner.
- With regards to road crash/response the NTFRS crews will respond as required within existing capacity as with any other crash. If the timeliness of that response does not adequately mitigate the risk for PNX Limited Fountain Head Gold Project then self-funded measures should be implemented.
- The NTFRS is happy to advise PNX Limited Fountain Head Gold Project on current capabilities in the vicinity of their operation to inform their risk assessment.
- The NTFRS are not in a position to provide comment around environmental impacts within this request for comment.
- An upsurge in gold production activities will obviously incur a growth in road usage by workers coming and going, plant equipment being moved and heavy haulage trucks on the highway delivering to the processing plant.
- It is also highly probable that bulk loads of cyanide may be transported to the processing plant during the refining processes. Processes are currently in place to manage these contingencies in an emergency.
- Both Pine Creek and Adelaide River Police have had good dealings with mining companies within the region, and have developed MOUs and a good relationship between them to assist in providing their specialised equipment and Mining Emergency Response Teams to assist in local emergencies if and when required.

Please let us know if you require anything further.

Kind regards,

**Megan Hughes** | Ministerial Liaison Officer  
Secretariat | NT Police, Fire and Emergency Services  
6<sup>th</sup> Floor NAB House, 71 Smith Street, Darwin  
PO BOX 39764, Winnellie NT 0821  
p... (08) 8901 0225 | e... [megan.hughes@pfes.nt.gov.au](mailto:megan.hughes@pfes.nt.gov.au) | [www.pfes.nt.gov.au](http://www.pfes.nt.gov.au)



*We acknowledge the first nation people through traditional owners, custodians of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to their culture and to their Elders both past and present.*

---

**From:** noreply@ntepa.nt.gov.au  
**Sent:** Friday, 25 June 2021 8:53 AM  
**To:** eia NTEPA  
**Subject:** NTEPA Consultation - Fountain Head Gold Project

**Categories:** Roland

Consultation title: Fountain Head Gold Project  
Closed date: 2021-08-06T23:59:00

**Your details**

Full name:

Email address:

Telephone:

Address:

Are you making this submission on behalf of an organisation?: No

Organisation name:

**Submission contents**

Enter your submission below.  
Maximum of 500 words:

I know both the company and the project. I have worked with the team from PNX for the last 7 years and they have been great to deal with, they communicate well and have worked closely with many of our staff over many years. The Fountain Head project requires some environmental repair which I trust PNX to complete as part of their mining plans for the project. I personally support their work and look forward to having another mining company in the Pine Creek area.

**Submission files**

Attachment 1: No file uploaded  
Attachment 2: No file uploaded  
Attachment 3: No file uploaded  
Attachment 4: No file uploaded  
Attachment 5: No file uploaded

**Acknowledgement**

Before submitting this form please check one of the boxes below to indicate that you agree with one of the following statements:

I agree for my submission to be published, I request that my submission be published with my identifying information removed