

07 July 2023

Michelle Kassman Mining Team Manager Department of Industry, Trade and Tourism E: <u>mineralinfo.DITT@nt.gov.au</u>

Dear Michelle,

Re. MMP Amendment – Sediment Basin Relocation Works and MWD1 Cell 3 Construction

Lithium Developments (Grants NT) (LD) submitted Mine Management Plan (MMP) amendment to the Department of Tourism and Trade (DITT) on 28 April 2023. The amendment considered changes to the design and operation of several structures, necessitated by a drive to improve water management outcomes as well as revised mine geotechnical safety advice.

Geotechnical advice provided by SMEC (2022), identified the need to reduce the wall angle of the upper sections of Grants pit. Reduction of the wall angle resulted in the expansion of the pit crest and encroachment on Sediment Basin 1 and proposed MWD1 Cell 2 footprint. SMEC (2022) recommended relocation of MWD1 (Cell 2) and Sediment Basin 1 due to the proximity of large water storages immediately adjacent to the pit crest.

To ensure stability of the pit as well as ensuring available capacity to store and manage mine affected water, changes to water management structures in this area are required. These changes include:

- Relocation of MWD1 (Cell 2) south into the location Sediment Basin 5;
- Construction of an additional cell (Cell 3) of MWD1 outside the existing disturbance footprint;
- Relocation of Sediment Basin 1 and Sediment Basin 5 outside of the existing disturbance footprint and construction as High Efficiency Sediment (HES) Type B basins; and
- Dewatering and backfill of Sediment Basin 1;

This letter amendment has been revised to also facilitate construction of MWD1 Cell 2 and MWD1 Cell3 as well as incorporate the request for information (RFI) provided by the Department on 17 May 2023 (M2018/0050-0012~0009).

Yours sincerely,

Melissa Winks Executive General Manager Sustainability Lithium Developments (Grants NT) Pty Ltd mwinks@corelithium.com.au



Objectives

In consideration of Condition 9 of Authorisation 1021-01, which prohibits the commencement of future activities until written approval, or the conditions of the Authorisation are varied, the objective of this amendment is to:

- Facilitate relocation of Sediment Basin 1 and 5 to ensure construction is complete prior to the 2023 / 2024 wet season;
- Facilitate construction of MWD1 Cell 2 and 3 to ensure available capacity to store and manage mine affected water from Grants pit prior to the 2023 / 2024 wet season;
- Detail the proposed structures including preliminary concept designs; and
- Justify the proposed works and assess potential risks of proposed works in consideration of existing commitments and obligations.

Proposed Works

Due to topography, drainage and a limited space within the current disturbance footprint, it is proposed to relocate Sediment Basin 1 and 5 and construct an additional MWD1 cell (Cell 3) outside of the existing Grants disturbance footprint (Figure 1). Cell 2 of MWD1 will be located within the existing disturbance footprint, in the location of the existing Sediment Basin 5.

Structure Design and Sizing

Sediment Basins

Engineering firm, Topo, have been engaged to provide concept and detailed designs of the proposed sediment basins. To improve environmental performance and wet season stormwater management outcomes, the relocated basins will be constructed as a High Efficiency Sediment (HES) Type-B basins (IECA, 2018).

Preliminary sizing of Sediment basins 1 and 5 provided by Topo (2023) indicates a nominal capacity of 26.1 ML and 20.1 ML, respectively. Proposed basins have been sized appropriately for the revised site layout, accounting for the maximum catchment area for the site in accordance with Appendix B of IECA (2018) best practice. Basin sizing have been prepared by Topo and provided in the table below.

			Length (m)		Depth (m)	Approx. Disturbance (ha)
Sediment Basin 1	50.2	26.1	183	61	3	3.5
Sediment Basin 5	38.6	20.1	163	54	3	2.5

Geotechnical advice of the proposed locations indicates Sed 1 should be lined with a lowpermeability liner to minimise groundwater influence on the eastern pit slopes. This will be incorporated in the detailed design.

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MWD1 Cell 2 and Cell 3

Engineering firm, GHD, have been engaged to provide concept and detailed designs of the proposed MWD1 Cell 2 and Cell 3. Dams will be constructed in accordance with ANCOLD (2003) guidelines and subject to independent certification. Dam sizing are provided in the Table below.

		Length (m)		
Cell 2	120	214	187	n/a area within existing disturbance.
Cell 3	120	154	213	4





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Vegetation Clearing, Topsoil and Earthworks

Additional clearing is required to facilitate construction of the sediment basins and Cell 3 of MWD1. Cell 2 of MWD2 has been relocated within the existing disturbance footprint with additional clearing not required.

Clearing requirements for both sediment basins and drainage lines, as well as MWD1 Cell 3 are provided in above. Approval is being sought to clear 10 ha of vegetation to allow construction of both basins and MWD1 Cell 3. It is anticipated that the final disturbance footprint / clearing requirements will be less than the proposed 10 ha.

Consistent with the existing MMP, the top 200 mm of topsoil is proposed to be recovered and stockpiled in the existing topsoil storage facility. Additional growth medium may be recovered should it be suitable for rehabilitation requirements.

Construction grade material comprising lateritic clays may also be recovered for use in construction of the basin and or to facilitate ongoing construction activities across the broader project area.

Timing

Both Mine Water Dam cells, sediment basins and associated drain lines are required to be constructed prior to the commencement of the wet season. LD anticipate construction to be complete, and the basin operational, prior to 31 October 2023. Key dates for the completion of all structures are provided in the table below.

Structure / Aspect	Proposed Completion Date
MWD 1 Cell 3, Cell 4	 Decommissioning Sed 5: 31 July 2023 Bulk Earthworks: 13 November 2023 Spillway: 22 November 2023 Commissioning: 28 November 2023
Sed 1 / Sed 5 and associated drainage works	• 26 October 2023
Flood Inundation Bund (FIB) modification (If required – subject to final design)	• 31 October 2023
Backfilling of Sed 1	• 30 September 2023
Revised ESCP	Revised ESCP: 30 September 2023Implement Controls: 31 October 2023

Flood Modelling

Flood impact was raised as an additional design consideration for both sediment basins and MWD1 Cell 3. Potential flood impact was assessed by WRM (2023) and compared to current modelled conditions to determine predicted peak flood extents, levels and depths for the 1% AEP design event. Modelling also allowed potential waterway impact to be assessed and provide design levels for the construction of Sed 1, Sed 5 and MWD1.



Modelling indicated construction of the proposed structures has negligible impacts on flood levels downstream in comparison to existing conditions, however several localised impacts during a 1% AEP rain event included:

- Ponding may occur south of Sed 1 and Sed5 with minor earthworks required to prevent permanent ponding against the embankment at this location.
- Localised increase in water levels immediately surrounding Sed 1 and Sed 5 by 0.3 0.4 m. This localised impact will be factored into the detailed design of the basin to prevent inflow from the floodplain.
- Flooding may extend 100-180 m further east of Sed 1 and Sed 5 as water moves through the flood plain around them. Flood extents are contained within the immediate area and to not encroach on existing surface infrastructure i.e access tracks.
- Increased likelihood of water from drainage line 3 entering drainage line 2 under high conditions flow (1 % AEP rain event).
- Minor reduction in flood levels north of proposed MWD1 Cell 3 and Sed 1.

Flood impacts or changes to hydrogeology of drainage line 2 and 3 are not considered material in comparison to existing conditions and impacts assessed in the Grants EIS. Flood impacts will continue to be monitored and mitigation measures provided in Surface Water Infrastructure Assessment Report (WRM 2022) implemented as required.

Flood mapping and modelling results are presented in Attachment A.

Additional Design Considerations

Topo (2023) have noted that correct levels are critical for operation of Type-B sediment basins which require cascading flow to ensure optimal operation. Due to the relatively flat topography, the location of the proposed basins may be required to be refined during the detailed design phase to ensure correct levels are achieved. The final basin design will be subject to survey and geotechnical advice. Detailed designs will be issued to the Department prior to construction.

Independent Certification

Within three months of completion of the sediment basins and additional mine water dams, as-built construction reports certified by an independent certified engineer will be provided.

Justification of Works

Grants Pit Geotechnical Stability

Upon receipt of Geotechnical advice provided by SMEC (2022), the Grants pit was expanded to facilitate reduction in the wall angle. SMEC (2022) recommended relocation of MWD1 (Cell 2) and Sediment Basin 1.



To meet the above recommendations, the proposed works are required to:

- Reduce the risk of instability and improve operational safety of the pit by removing large water storages from the expanded pit crest.
- Allow for MWD1 Cell 2 to be relocated to the south of Cell 1 within the footprint of the existing Sediment Basin 5.
- Increase disturbance outside the existing footprint to construct sediment basins due to the lack of available area within the current approved extents.
- Ensure site runoff currently bypassing Sed 5 is captured for treatment prior to leaving site.

Erosion Sediment Control and Water Management

Sediment Basin Management

Existing Sediment Basin 1 and 5 are constructed as traditional Type-D sediment basins which have limited effectiveness in the wet tropics due to their reduced ability to manage runoff during monsoonal rain conditions. The basins have been designed in accordance with (IECA, 2008) and are sized for a 5-year design rainfall event of 55 mm.

Despite best practice ESC and sediment basin management, rain events above 55 mm will result in the release of turbid water through a designated spillway. This was observed on several occasions during the 2022 / 2023 wet season.

Construction of the proposed sediment basins will improve wet season ESC performance and general water management as:

- The basins will be constructed as HES Type-B basins that will be sized to enable stormwater to be treated and passively released within adopted IECA (2018) water quality objectives.
- Type-B basins are expected to significantly reduce management requirements and improve water quality, allowing a greater quantity of water to be treated over traditional Type-D basins.
- The basins will be in a position that captures all stormwater runoff from the current disturbance footprint. Presently, runoff from a small portion of the site bypasses Sediment Basin 5 due to modelled surface flow paths that were not realised during the 2022 / 2023 wet season.
- The basins will provide additional water storage for possible use in mining and processing activities during the dry season to limit the reliance on water extracted from Observation Hill Dam (OHD).

Wet Season Water Management / Water Security

Wet season water management and water security are two critical management concerns at Grants mine. Effective water management during the wet season and security of dry season water supplies are key to maintaining continuity of mining operations and environmental values in the surrounding environment.



Two additional mine water dam cells will provide 240 ML of water to the Grants water balance, minimising the likelihood of offsite discharge during wet season months. Mine affected water will be retained onsite into the dry season, reducing the reliance on raw water drawn from Observation Hill Dam under an existing limited surface water extraction licence.

Vegetation Clearing and Disturbance

The existing Authorisation permits a disturbance footprint of 254 ha. To date, 213 ha of vegetation has been cleared. Clearing requirements have been reduced due to the retention of 'green belts' onsite and an evaluation and revision of topsoil requirements for rehabilitation activities.

Proposed additional disturbance is not considered a material change as:

- The additional disturbance required is within the original approved 254 ha permitted under existing approvals.
- Additional disturbance will not adversely impact the occurrence of the low open woodland vegetation type, impacting <1.7% of the extent mapped across ML31726 and ML32071.
- Clearing activities will not impact the occurrence of available habitat for sensitive threated flora and fauna as previously assessed through the EIS approvals process.
- Clearing will be undertaken in accordance existing established procedures and management plans.
- Efforts will be made to minimise the required clearing of vegetation subject to completion of detailed designs.

EP Act (2019) Self-Assessment Tool

Proposed works were subject to self-assessment to determine if there was potential to meet a referral trigger under the Environmental Protection Act (2019). Self-assessment was undertaken in accordance with NT Environmental Protection Authority guidance on referring a proposal to the NT EPA (2021).

The pre-referral screening tool has been completed by EcOz, who determined that proposed works do not require referral under the Act. The screening tool and accompanying justification is provided in Attachment B.

Risk Assessment

A risk assessment was undertaken in accordance with the methodology detailed in the Section 5.6 of the current MMP (2022). For each project activity, events / incidents that has potential cause impact to environmental values were identified and assessed. The full risk assessment in provided as Attachment C and summarised in the Table below.



						Impacts with elevated			
	Low			Very High					
Terrestrial Fauna and Flora	7	1	0	0	8	Introduction of weeds in imported materials			
Terrestrial Environmental Quality	2	1	0	0	3	Soil erosion due to increased runoff from cleared areas			
Downstream Water Quality	2	1	0	0	3	Increased turbidity in watercourses impacting environmental values and/or other users			
Hydrogeological Processes	2	0	0	0	2	Reduced / altered flows affects environmental values			
Air Quality and GHG	0	1	0	0	1	Release of GHG			
Total	13	4	0	0	17	n/a			

Risk ratings shown in the Table above do not indicate a high or very high residual risk for each event / impact assessed. Several impacts assessed retained a medium residual risk rating which is consistent with the impacts observed across the broader Grants site during the 2022 / 2023 wet season. Impacts can be managed through implementation of existing management plans, procedures and appropriate supervision. Additional flood modelling will be carried out prior to prior to construction to guide development of detailed designs and assess / mitigate potential impact to overland flow in the adjacent floodplain.

Summary

A summary of the proposed works is provided in the Table below:

Aspect		
Proposal	Construction of two HES Type-B sediment basins outside of the existing approved disturbance area.	Construction of two additional MWD1 cells. Cell construction will mirror the existing MWD1 Cell 1 construction.
Objective	To facilitate removal / relocation of existing Sediment Basin 1 and 5 to ensure compliance with geotechnical safety advice for the expanded Grants pit	Increase storage capacity and treatment flexibility of mine effected water during the wet season. Provide a source of onsite water for dry season use and minimise reliance on OHD.
Proposed Basin Volume	52.9 ML	240 ML
Proposed Disturbance Required	6 ha	4 ha (MWD 1 Cell 3 only)
Risk Rating	Low	Low

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References

EcOz (2022) Mine Management Plan Grants Lithium Project Mining Operations. Authorisation 1021-1 (September 2022)

EcOz (2023) Self-Assessment Referral Screening – Grants Sediment Basin Relocation and MWD1 Cell 3 Construction. Document reference 228846) July 2023.

IECA (2008) Best Practice Erosion and Sediment Control (BPESC). International Erosion Control Association (November 2008)

WRM (2022) Grants Surface Water Infrastructure Assessment. Document reference 1727-02-K2 (March 2022)

WRM (2023) Grants SW1 Updated flood assessment. Mail advice 1727-19-A received 4 July 2023.

ATTACHMENT A – WRM FLOOD MODELLING



Legend

Projection: EPSG:28352



< -0.10 m -0.10 m to -0.01 m 0.01 m to 0.01 m 0.01 m to 0.10 m 0.10 m to 0.20 m 0.20 m to 0.30 m 0.30 m to 0.40 m 0.40 m to 0.50 m

0.50 m to 1.00 m 1.00 m to 5.00 m Was wet now dry Was dry now wet

Grants SW1 flood assessment

Predicted peak 1% AEP flood level impacts





Legend	Flood depth
 Proposed bund or sediment dam wall Proposed MWD wall Proposed drain Proposed spillway Flood Levee Drainage line In water level contours Reporting locations Proposed relocated MWD Proposed relocated sediment dam 	up to 0.25 m 0.25 to 0.5 m 1.0 to 1.5 m 1.0 to 1.5 m 2.0 to 2.5 m 2.0 to 2.5 m 3.0 to 3.5 m 3.5 to 4.0 m 4.0 to 4.5 m

Grants SW1 flood assessment

Predicted peak 1% AEP flood depths, levels and extents





1:\1727-19 Grants SW1 flood assessment\GIS\OGIS\Grants 2023 working.qqz (TURLOW RES D9 2023 WSL A3 POTRAIT FULL PAGE) (Exported: 03 July 2023)



ATTACHMENT B – EP ACT (2019) SELF ASSESSMENT





Project: Grants - Sediment Basin Relocation Works and MWD1 Cell 3 Construction

The NT EPA have developed a pre-referral screening tool to assist proponents determine whether their Proposal has potential to have a significant impact on the environment and therefore requires referral under the *Environment Protection Act* 2019. The tool is also used to identify the key environmental factors that are relevant to a Proposal that may require more detailed consideration during site selection and project planning. The tool has two parts:

- Part 1 Screening Questions.
- Part 2 Answer Checklist.

The tool is provided in the *Guideline – Referring a Proposal to the NT EPA* <u>https://ntepa.nt.gov.au/publications-and-advice/environmental-management</u>.

EcOz Environmental Consultants (EcOz) were engaged by Lithium Developments (Grants NT) Pty Ltd (LD) to undertake pre-referral screening of the proposed construction works. To ensure stability of the Grants pit as well as ensuring available capacity to store and management mine affected water, changes to existing water management structures are required. These changes include:

- Relocation of MWD1 (Cell 2) to the south;
- Construction of an additional cell at MWD1 (Cell 3) outside the existing disturbance footprint;
- Relocation of Sediment Basin 1 and Sediment Basin 5 outside of the existing disturbance footprint and construction as High Efficiency Sediment (HES) Type B basins;
- Stabilising, filling and compaction of the former MWD1 Cell 2 footprint, for use as an additional hardstand area; and
- Dewatering and backfilling of former Sediment Basin 1.

The objectives of this assessment are to:

- Facilitate approval of the sediment basins to ensure construction is complete prior to the 2023/2024 wet season;
- Facilitate construction of MWD1 Cell 2 and 3 to ensure available capacity to store and manage mine affected water from Grants pit prior to the 2023/2024 wet season; and
- Justify the proposed works and assess potential risks of proposed works with consideration of existing commitments and obligations.

The screening was undertaken with reference to the screening questions shown in Figure 1 and the results are documented in Table 1 below.





Figure 1. Pre-screening tool screening questions (Source: NT EPA 2021)

Project: Grants - Sediment Basin Relocation Works and MWD1 Cell 3 Construction

Table 1. Pre-referral screening tool checklist prepared for the relocation of sediment basins 1 and 5, and construction of MWD1 Cell 3 at Grants

				Pre-referral screening questions						Comments on whether or not referral required				
Theme	Factor and Objective	Background information (about the Project)	Environmental values, sensitivities (based on desktop		Q1	Q2	Q3	Q4	Q5					
			and/or surveys)	Yes No										
	Landforms <u>Objective:</u> Conserve the variety and integrity of distinctive physical landforms.	No distinct natural landforms.	 No distinct natural landforms. 	Yes No Uncertain N/A						 Does not trigger referral. No distinct natural landforms are identified in the Project area subject to this pre-referral screening tool. 				
Land	Terrestrial Environmental Quality <u>Objective:</u> Protect the quality and integrity of land and soils so that environmental values are supported and maintained.	 The existing Authorisation permits a disturbance footprint of 254 ha. To date, 213 ha of vegetation has been cleared. Up to 10 ha will be cleared for the construction of two sediment basins (SB1 and SB5) and construction of one cell (Cell 3 of MWD1). The additional disturbance is within the original approved 254 ha permitted under existing approvals. The existing SB1 and SB5 are constructed as traditional Type-D sediment basins which have limited effectiveness in the wet dry tropics. Construction of the High Efficiency Sediment (HES) Type-B basins will improve wet season ESC performance. Engineering firm, Topo, have been engaged to provide detailed designs of the proposed sediment basins. Engineering firm GHD have been engaged to provide detailed designs of the proposed MWD1 Cell 3. Cell 2 of MWD1 will be relocated with the existing disturbance footprint, and additional clearing is not required. The former SB1 will be rehabilitated. The former MWD1 Cell 2 will be stabilised, filled and compacted to provide an additional hard stand area. Erosion risk will be managed through implementation of existing management plans, procedures and appropriate supervision. To avoid and mitigate impacts from erosion, LD operates under an Erosion and Sediment Control Plans (ESCP) that meets the IECA Guidelines and specifications (IECA, 2018). 	 Land unit mapping for Greater Darwin (1:25:000) indicates that soils within the Project area predominately comprise hydrosols and rudosols with small areas of kandosols (Grants MMP, 2019). The land unit mapping groups land units into classes which describe the risk of acid sulphate soil (ASS) conditions. The land unit mapping shows the Project area has a Nil (class 1) risk of ASS conditions. This information correlates with the Land Systems of the Northern Part of the Northern Territory (1:250:000) which shows there is no area of potential ASS within the Project area (Grants MMP, 2019). 	Yes No Uncertain N/A						 The proposed works are considered unlikely to have a significant impact on terrestrial environmental quality as: LD operates under a IECA certified ESCP which will be updated and implemented to reflect proposed works. Principles contained within the ESCP will be implemented during construction. HES Type B basins are more suited to manage stormwater runoff in the wet / dry tropics and are more effective in reducing sediment loads over existing conventional Type D basins. Basins will be built to detailed engineered design by a suitably qualified person. Flood impact modelling conducted by WRM (2023) indicate minor localised impact in the immediate vicinity of the proposed structures, with negligible impact downstream. LD will monitor for potential flood impacts and implement mitigation measures as required which have been provided in the Surface Water Infrastructure Assessment Report (WRM, 2022). 				

				Pre-referra	l scre	ening	g que	stions	6	Comments on whether or not referral required			
Theme	Factor and Objective	Background information (about the Project)	Environmental values, sensitivities (based on desktop and/or surveys)		Q1	Q2	Q3	Q4	Q4	Q5			
				Yes No	\square								
	Terrestrial Ecosystems <u>Objective:</u> Protect terrestrial habitats to maintain environmental values including biodiversity, ecological integrity and ecological functioning.	 The existing Authorisation permits a disturbance footprint of 254 ha. To date, 213 ha of vegetation has been cleared. Up to 10 ha will be cleared for the construction of 2 sediment basins (SB1 and SB5) and construction of one cell (Cell 3 of MWD1). The additional disturbance is within the original approved 254 ha permitted under existing approvals. Cell 2 of MWD1 will be relocated with the existing disturbance footprint, and additional clearing is not required. Clearing activities will not impact the occurrence of available habitat for sensitive threated flora and fauna as previously assessed through the EIS process. Clearing will be undertaken in accordance with existing established procedures and management plans. Efforts will be made to minimise the required clearing of vegetation subject to completion of detailed designs. Consistent with the existing MMP, the top 200 mm of topsoil is proposed to be recovered and stockpiled in the existing topsoil storage facility. Weeds will be managed through implementation of existing management plans, procedures and appropriate supervision. 	 Additional disturbance will not adversely impact the occurrence of the low open woodland vegetation type, impacting <1.7% of the extent mapped across ML31726 and ML32071. No permanent wetlands are located within the Project area. Some seasonally inundated areas are patchily distributed through the ML. These areas support sedges and herbs in the ground layer during the wet and early dry season and dry out later in the dry season (Grants EIS, Chapter 5). No riparian, wetland or mangrove communities are in the disturbance footprint (Grants EIS, Chapter 5). According to EcOz survey <i>Typhonium praetermissum Survey Report Grants Lithium Project, 2019</i>, the species has not been found in the Project area. 	Yes No Uncertain N/A						 The proposed works are considered unlikely to have a significant impact on terrestrial ecosystems as: Clearing activities will not impact the occurrence of available habitat for sensitive threated flora and fauna as previously assessed through the EIS process. Clearing will be undertaken in accordance with existing established procedures and management plans. Weeds will be managed through a Weed Management Plan. Clearing areas are within the total extent originally assessed in the EIS. 			
Water	Hydrological Processes <u>Objective:</u> Protect the hydrological regimes of groundwater and surface water so that environmental including ecological health, land uses and the welfare and amenity of people are maintained.	 Potential flood impact was assessed by WRM (2023) and compared to current modelled conditions to determine predicted peak flood extents, levels, and depths for the 1% AEP design event. Modelling also allowed potential waterway impact to be assessed and provide design levels for the construction of SB1, SB5 and MWD1. Modelling indicated construction of the proposed structures would have negligible impacts on flood levels downstream in comparison to existing conditions, however, several minor localised impacts were identified. Modelling showed that the proposed configuration will increase flood levels against the existing levee at some locations. Notwithstanding this, the proposed changes would maintain a minimum freeboard of 0.3 m against the flood levee, during a 1% AEP flood event. The existing levee has been constructed to 1.4 m above natural surface which provides sufficient freeboard. Proposed works would not adversely impact the 1% AEP flood levels downstream of the mine at Cox Peninsula Road when compared with the previous conditions. However, as per SWIA report (WRM, 2022) the proposed flood levee will potentially result in increased flows towards Drainage Line 1 on Cox Peninsula Road when compared with pre-mining conditions. Mitigation measures to reduce the impacts as discussed in the SWIA report (WRM, 	 The Project area is in the Finniss River drainage basin within the Timor Sea Drainage Division. Most of the Project area is within the Darwin Harbour catchment, with the southwest corner lying in the Bynoe Harbour catchment. All Project components are within the Darwin Harbour catchment. There are no major watercourses within the Project area. Surface water runoff from the Project area within the Darwin Harbour catchment is via three ephemeral drainage lines. These drainage lines meet at a perennial watercourse approximately 1.2 km north of the Project area, which drains into a tidal inlet of Darwin Harbour. The major project components do not intersect any of these mapped drainage lines. The southwestern corner of the Project area, within the Bynoe Harbour catchment, is drained by two ephemeral drainage lines, which meet at a perennial watercourse approximately 2.2 km southwest of the Project area. These will not be intersected by the proposal. 	Yes No Uncertain N/A						The proposed works are considered unlikely to have a significant impact on hydrological processes as flood impact modelling conducted by WRM (2023) indicate minor localised impact in the immediate vicinity of the proposed structures, with negligible impact downstream. LD will monitor for potential flood impacts and implement mitigation measures as required which have been provided in the Surface Water Infrastructure Assessment Report (WRM, 2022).			

				Pre-referral screening questions							
Theme	Factor and Objective	Background information (about the Project)	Environmental values, sensitivities (based on desktop		Q1	Q2	Q3	Q4	Q5		
				Yes							
		2022) will be implemented as required should an increase in flood impacts be observed on Cox Peninsula Road.									
	Inland Water Environmental Quality <u>Objective:</u> Protect the quality of groundwater and surface water so that environmental values including ecological health, land uses and the welfare and amenity of people are maintained.	 Land clearing and construction of the proposed dams and cell have the potential to cause erosion and sedimentation to downstream waterways. To avoid and mitigate impacts from erosion, LD operates under an ESCP that meets the Guidelines and specifications (IECA, 2018). The existing SB1 and SB5 are constructed as traditional Type-D sediment basins which have limited effectiveness in the wet dry tropics. Construction of the High Efficiency Sediment (HES) Type-B basins will improve wet season ESC performance. Engineering firm, Topo, have been engaged to provide detailed designs of the proposed sediment basins. Condition 30 of WDL 248-1 requires implementation of a monitoring program for surface water quality, fluvial sediment quality, and biota in watercourses downstream of Grants and in the West Arm of Darwin Harbaur. 	 Watercourses within and surrounding the Project area are ephemeral and do not have a high level of community use or value. There are no beneficial users of groundwater or surface water down stream of the Grants site. 	Yes No Uncertain N/A							
	Aquatic Ecosystems Objective: Protect aquatic habitats to maintain environmental values including biodiversity, ecological integrity and ecological functioning.	 There are no permanent watercourses in the project area, all drainage lines are relatively small and cease to flow early in the Dry season. Aquatic surveys undertaken by GHD (2017) found the aquatic habitats are typical of low order watercourses in the NT. These types of habitats are common and do not have any significant value in terms of supporting species that are range restricted or threatened. 	 Watercourses within and surrounding the Project area are ephemeral and so do not support a high diversity of aquatic flora and fauna. Field surveys did not identify any sensitive vegetation types within the disturbance footprint. However, riparian and mangrove vegetation occur in areas downstream that could be affected if the proposal were to substantially alter surface water or groundwater flows (Grants EIS, Chapter 5). 	Yes No Uncertain N/A							
Sea	Coastal Processes Objective: Protect the geophysical and hydrological processes that shape coastal morphology so that the environmental values of the coast are maintained.	 The EIS did not identify significant impacts to coastal process related to the Grants site. It was indicated there will be limited impacts to freshwater flows entering West Arm. Condition 30 of WDL 248-1 requires implementation of a monitoring program for surface water quality, fluvial sediment quality, and biota in watercourses. 	The project is located on land approximately 1.7 km upstream from the upper tidal limit of West Arm and as such direct impacts are minimised.	Yes No Uncertain N/A							
	Marine Environmental Quality Objective: Protect the quality and productivity of water, sediment and biota so that environmental values are maintained.	downstream of Grants and in the West Arm of Darwin Harbour. This includes monthly monitoring of marine water quality at three locations within Darwin Harbour's West Arm during the wet season. The 2023 revision of the WDL included an additional two harbour monitoring locations downstream of the compliance point.		Yes No Uncertain N/A							
	Marine Ecosystems Objective: Protect marine habitats to maintain environmental values including biodiversity, ecological integrity and ecological functioning.	F		Yes No Uncertain N/A							

	Comments on whether or not referral required
Q5	
	 The proposed works are considered unlikely to have a significant impact as: LD operates under a IECA certified ESCP which will be updated and implemented to reflect proposed works. Principles contained within the ESCP will be implemented during construction. HES Type B basins are more suited to manage stormwater runoff in the wet / dry tropics and are more effective in reducing sediment loads over existing conventional Type D basins. Basins will be built to detailed engineered design by a suitably qualified person. LD will monitor for potential impacts to the freshwater environment in accordance with the WDL Monitoring Program (EcOz, 2022) and conditions of WDL248-1.
	The EIS identified watercourses within and surrounding the Project area are ephemeral and do not support a high diversity of aquatic flora and fauna. Proposed works are considered unlikely to have a significant impact.
	The proposed works are considered unlikely to have a significant impact as Construction of HES Type B basins will improve the quality of water leaving site over existing Type D basins and reduce sediment loads entering West Arm of Darwin Harbour. LD will monitor potential impacts to the marine environment in accordance with the WDL Monitoring Program (EcOz
	2022) and conditions of WDL248-1.

Theme Factor and Objective				Pre-referral screening questions								
		Background information (about the Project)	Environmental values, sensitivities (based on desktop		Q1	Q2	Q3	Q4	Q			
			and/or surveys)	Yes No								
	Air Quality <u>Objective:</u> Protect air quality and minimise emissions and their impact so that environmental values are maintained.	 New emissions will be related to construction work only, and therefore are expected to be minimal. Operation of the ponds/cell are not anticipated to result in additional emissions to air. Clearing will be undertaken in accordance existing established procedures and management plans. Efforts will be made to minimise the required clearing of vegetation subject to completion of detailed designs. Dust will be managed through implementation of existing management plans, procedures and appropriate supervision. 	 During the EIS process it was identified that the only major source of air emissions was dust from ore extraction and materials handling. The Project water balance includes adequate allowance of water for dust suppression activities and there are no sensitive receptors located in close proximity to the mine site. 	Yes No Uncertain N/A								
Air	Atmospheric Processes <u>Objective:</u> Minimise greenhouse gas emissions so as to contribute to the NT Government's aspirational target of achieving net zero greenhouse gas emissions by 2050.	 New emissions will be related to construction work only, and therefore are expected to be minimal. Operation of the ponds/cell are not anticipated to result in additional emissions to air. 	 Greenhouse gas emission (GHG) estimates were provided during the EIS process. The Project is not expected to be a significant contributor to NT GHG emissions. 	Yes No Uncertain N/A								
People	Communities and Economy Objective: Enhance communities and the economy and foster resilience to a changing climate, for the welfare, amenity and benefit of current and future generations of Territorians.	 The mine currently employs over 250 direct employees and contractors, with a large proportion of the work force Territory-based. The NT Government will benefit from royalties under the Mineral Royalty Act. The Australian economy will benefit from export income. A lithium mine in the NT is a positive step in establishing a path to a renewable future. 	• N/A	Yes No Uncertain N/A								
	Culture and Heritage Objective: Protect sacred sites, culture and heritage	 There is a Declared Heritage Area (Aboriginal archaeological site) within the Project area which is located in the north-west portion of the lease outside of proposed development footprints. An Authority Certificate has been obtained from the Aboriginal Areas Protection Authority (AAPA) for this site (Certificate #C2022-049). A search of AAPA Register did not identify any additional registered or recorded sacred sites. 	There are no significant aboriginal or European heritage items within the proposed disturbance footprint.	Yes No Uncertain N/A								
	Human Health Objective: Protect the health of Northern Territory population.	 During the EIS process it was identified that the Project does not involve any activities that pose a significant risk to human health and safety. There are no major sources of contaminants that could move off-site and impact the public. No additional sources or impacts are expected from the relocation of the basins and construction of an additional cell, when compared to the previous design. Workforce health and safety will be regulated in accordance with national requirements. Impacts associated with increased road traffic assessed in the EIS under the Social, Economic and Cultural Surroundings factor. 	 There are no nearby sensitive receptors to the Grants site. The nearest residential dwelling is located approximately 10 km south of the site. There is no significant or continuous community use of areas within proximity and downgradient of the site. 	Yes No Uncertain N/A								

Comments on whether or not referral required
 Does not trigger referral. No substantial or material change from existing conditions.
 Does not trigger referral. No substantial or material change from existing conditions.
 Does not trigger referral. No substantial or material change from existing conditions.
 Does not trigger referral. No substantial or material change from existing conditions.
 Does not trigger referral. No substantial or material change from existing conditions



ATTACHMENT C – RISK ASSESSMENT



Environment Factor	Incident / Event	Impact	Likelihood	Conseque	Inherent Risk Controls		Likelihood	Consequence	Residual Risk
		Loss of sensitive vegetation types	1	1	1 - Low	\cdot n/a communities not present	1	1	1 - Low
	Vegetation clearing	Loss of fauna habitat	2	1	1 - Low	 Vegetation Clearing Procedure includes controls for marking of clearing boundaries, topsoil removal and storage, vegetation disposal and erosion and sediment control to further minimise impact. All clearing works are completed under a Ground Disturbance Permit which ensures clearing is undertaken in a manner that identifies and controls potential environmental risks. 	1	1	1 - Low
	Uncontrolled bushfire caused by construction or burning of stockpiled vegetation	Reduced habitat quality due to loss of understorey	3	2	 Vegetation Clearing Procedure includes controls for minimising fire risk during clearing and disposal of vegetation. The Ground Disturbance Permit contains controls when clearing areas with elevated fire risk. These include use of fire spotters during clearing as well as timing of clearing to ensure risk is minimised. 		1	2	1 - Low
Terrestrial Flora and Fauna	Dust emissions caused by operation of machinery and equipment	Reduced habitat quality due to smothering of plants with dust	2	2	1 - Low	 Dust suppression will be undertaken using water carts during clearing and construction. A depositional dust monitoring program has commenced and assess for potential risk from generation of dust during clearing and construction activities. The Dust Management Plan will be implemented and provides a framework for the proactive identification and management of just generated through site activities. 	2	1	1 - Low
	Removal of vegetation	Loss of Typhonium praetermissum habitat	1	1	1 - Low	 n/a modelled suitable habitat is not present in proposed disturbance footprint. 	1	1	1 - Low
	Weed introduction by machinery and equipment	Reduced habitat quality from competition and fire risk	3	3	2 - Medium	 All equipment to be used in clearing and bulk earthworks activities have been inspected and cleared as free of weeds, seeds and foreign materials. All new equipment brought to site will be subject to inspection prior to works. 	2	2	1 - Low
	Introduction of invasive pest species	Spread of invasive pest species	3	3	2 - Medium	 All equipment is to be inspected and cleared as free of invasive species. 	2	2	1 - Low

Environment Factor	Incident / Event	Impact	Likelihood	Conseque	Inherent Risk Controls		Likelihood	Consequence	Residual Risk
Terrestrial Flora and Fauna	Importation of quarried materials	Introduction and spread of weeds	4	3	3 - High	 Off-site sources to be inspected prior to delivery of materials to site to confirm low weed risk. Implementation of controls detailed in the Flora, Fauna, Pest and Weed Management Plan. 		2	2 - Medium
	Inappropriate topsoil removal and storage	Loss of soil structure and seedbank	3	2	2 - Medium	 Topsoil and suitable growth medium will be transported to the topsoil dump and managed in accordance with the Vegetation Clearing Procedure to ensure topsoil retains structure and viable seedbank. Topsoil depths will be routinely inspected to confirm appropriate removal techniques. 	2	2 2 1 - Low	
Terrestrial Environmental Quality	Disturbance of soils and alteration of surface water flows	Soil erosion due to increased runoff from cleared areas	4	3	3 - High	 Completion of construction of MWD1 cell 3 and sediment basins / associated drains prior to the 2023/24 wet season. Implementation of controls contained within the Grants ESCP prior to the 2023/24 wet season. 	3	2	2 - Medium
		Loss of riparian habitat downstream	2	2	1 - Low	 Spillways will be constructed to IECA (2008) design standards and include appropriate protection and flow dissipation to prevent downstream erosion. Basins and associated drainage lines will be designed by specialist engineering firm Topo. 	2	1	1 - Low
Downstream Water Quality	Erosion due to disturbance and exposure of ground surface	Increased turbidity in watercourses impacting environmental values and/or other users	4	3	3 - High	 Completion of construction of MWD1 cell 3 and sediment basins / associated drains prior to the 2023/24 wet season. Implementation of controls contained within the Grants ESCP. Basins will be constructed as Type-B sediment basins which is expected to greatly improve wet season performance over traditional Type-D basins. Water quality monitoring addressed in Water Management Plan with exceedances addressed under associated management TARPs. 		3	2 - Medium
	Erosion of stream banks downstream	Increased turbidity in watercourses impacting environmental values and/or other users	3	2	2 - Medium	 Spillways will be constructed to IECA (2008) design standards and include appropriate protection and flow dissipation to prevent downstream erosion. Basins and MWD will be designed by specialist engineering firms Topo and GHD. 	2	1	1 - Low

Environment Factor	Incident / Event	Impact	Likelihood	Conseque	Inherent Risk Controls		Likelihood	Consequence	Residual Risk
Downstream Water Quality	Rainfall produces sediment and/or contaminated runoff that is released offsite	Poor water quality downstream of sediment affects environmental values and/or other users	3	2	2 - Medium	 Basins will be constructed as Type-B sediment basins which is expected to greatly improve wet season performance over traditional Type-D basins. Water treated with flocculent and tested to achieve water quality criteria prior to release. Water Management Plan includes a surface water monitoring program to detect changes in water quality with corrective actions implemented as required. Water from MWD1 will be released under conditions of WDL248-1. ESCP to be implemented to control runoff from site. 	2	2	1 - Low
Hydrological Processes	Alteration of surface water flows and discharges	Reduced / altered flows affects environmental values	3	3	2 - Medium	 Sediment basins will be operated in accordance with IECA (2008) to minimise a reduction in environmental flows. Basins are in the upper catchment which minimise impact on water movement through the adjacent floodplain. Discharge from MWD1 is managed under WDL241, impact from which has been assessed in existing approvals. Flood modelling undertaken (WRM, 2023) indicates some isolated impact surrounding the sediment basins and WMD1 Cell 3 but negligible impact downstream during a 1% AEP flood event. 	3	1	2 - Low
	Harvesting of surface water from the sediment basins for dry season use.	Reduced flows downstream into West Arm affects environmental values	2	2	2 - Low	 Sediment Basins will be operated in accordance with IECA (2008) to minimise a reduction in environmental flows. Management of the structures will aim to retain water at the end of the dry for use for mining and processing activities. Retention of water to be undertaken in accordance with the Water Management Plan will reduce reliance on Observation Hill Dam for raw water. 	2	1	2 - Low
Air quality and Green House Gases	Removal of vegetation	Release of GHG	5	1	2 - Medium • Inclusion of increased clearing area in future GHG emissions reporting		5	1	2 - Medium

			CONSEQUENCE								
			1	2	3	4	5				
			Insignificant	Minor	Moderate	Major	Severe				
	5	Almost Certain	Medium	Medium	High	Very High	Very High				
0	4	Likely	Medium	Medium	High	Very High	Very High				
LIH	3	Possible	Low	Medium	Medium	High	Very High				
IKE	2	Unlikely Low Rare		Low	Medium	Medium	High				
-	1			Low	Low	Medium	High				

 Table 1: Risk matrix adopted in the risk assessment (Grants MMP, 2022)