



CENTRAL LAND COUNCIL

Submission to the Northern Territory Environmental Protection Agency (NTEPA) for Verdant Minerals' Ammaroo Phosphate Project - draft Environmental Impact Statement.

December 2017

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Recommendations

- A comprehensive Native Title Agreement be negotiated between the proponent and Native Title Holders in respect of all Project MLs, Infrastructure Corridors and ancillary tenure.
- Sacred site clearance and further archaeological work is required prior to any mining related works being undertaken for the Project MLs and Infrastructure Corridor.
- The CLC strongly encourages Verdant Minerals Ltd to develop innovative and collaborative strategies to successfully employ local Aboriginal people, regardless of their current skill level.
- Consultation with Native Title Holders regarding management of archaeological sites and material is required prior to construction.
- That groundwater monitoring and baseline data is gathered in relation to the Project including regional impacts.
- That monitoring bores are established near Ampilatwatja to provide further data on drawdown effects from water use by the operation.
- That the Life of Project water use should be considered with respect to future indigenous water use.
- That a mapping study similar to that done by Water Resources for the Western Davenport Water Allocation Plan is performed, to support the view that there are no Groundwater Dependent Ecosystems.
- Summarise the differences in water use (and other impacts) for scenarios of 25 year mine life, compared to that of a 40 year mine life.
- Provide calculations showing how the overall water balance error of less than 0.1% has been derived (Appendix H. Chapter 4.3).
- The re-routed Murray Downs road should be included in the amended Water Management Plan.
- Clarify the changes of chemical composition in groundwater in relation to how the effects of seepage will be monitored (Appendix H. Chapter 5.1.4).
- Clarify what treatment water during extreme flood events would be subject to before transfer to open pits.
- Clarify what methods will be used in managing supernatant water from the Tailings Storage Facility.
- Raise attention to the risks for local commuters when sharing the road, e.g, by developing and promoting traffic plans.
- Ensure that community members and the CLC are informed of any maintenance or changes to road conditions throughout the Project.
- Verdant should implement traffic management strategies to minimise risk to community members and others travelling on the road to Murray Downs during the construction of the Project, when the road will be shared with heavy vehicles.
- Greater consideration to the potential impacts on Bilbies be undertaken (e.g.,

restricting range of movement, potentially increased predation) including a more extensive and targeted tracking survey to be carried out by an experienced Bilby survey team with the view to developing an appropriate management response as needed. This should also include other significant species (e.g., Marsupial Mole, Golden Bandicoot) that are proximal to the proposed transport corridor and the Project area.

- Identify how operational staff and users of the infrastructure corridor will be trained to identify threatened flora and fauna, and how they will be reporting encounters of flora and predators (observation and kill log, recorded by truck drivers).
- Include the full Radiological Impact Assessment (RIC) EIS to support the Executive Summary; Radiological considerations for the Verdant Minerals Ammaroo Phosphate deposit.
- Provide further information as to the source of sand for primary filtration of water, and where it will be disposed of after use.
- Further information be provided to clarify:
 - why PM10 60 $\mu\text{g}/\text{m}^3$ has been used noting the national threshold of PM10 is 50 $\mu\text{g}/\text{m}^3$ (The National Environment Protection (Ambient Air Quality) Measure - Feb 2016, Table 1).
 - how the 100 $\mu\text{g}/\text{m}^3$ a contour, close to the plant and across the re-routed Murray Downs road (Figure 15-4), falls within regulations.
 - what is implied by minimal seepage from tailings and in relation to what is expected to evaporate or be recycled.
 - what dry density is sought before starting the capping process during rehabilitation. Further information is required regarding the implied expectation of 'several years' before capping and if this is consistent with the mapped mine stages.
- Provide information as to the effects (if any) on tailings stability / dewatering and the environment through the use of the flocculants and other processing chemicals.
- Provide information as to where the one sample of synthesized tailings was taken.
- Development of a training plan be undertaken with goals to employ at least 20% of staff from Alyawarre and other Aboriginal communities across the Barkly and Tennant Creek.
- Allow for local communities to access the destroyed gidgee trees for community purposes including firewood.

Introduction and context

The Central Land Council ('CLC') welcomes this opportunity to provide a submission to the Northern Territory Environmental Protection Agency ('NTEPA') for the draft Environmental Impact Statement for the proposed Ammaroo Phosphate Project ('EIS').

The CLC is a Commonwealth corporate entity established under the *Aboriginal Land Rights (Northern Territory) Act 1976* ('ALRA'). Amongst other functions, it has statutory responsibilities for Aboriginal land acquisition and land management in the southern half of the Northern Territory. The CLC is also a Native Title Representative Body established under the *Native Title Act 1993* ('NTA'). The CLC region covers approximately 780,000 km² of land, and 417,318 km² is Aboriginal land under the ALRA. Given existing pastoral land was not able to be claimed, Aboriginal land tends to be very arid and remote. Rights have been asserted and recognised under the *Native Title Act 1993*. In addition, traditional owners unable to claim land under the ALRA have succeeded in obtaining rights to small areas known as Community Living Areas, under NT legislation.

Through its elected representative Council of 90 community delegates, the CLC continues to represent the aspirations and interests of approximately 17,500 traditional landowners and other Aboriginal people resident in its region, on a wide range of land-based and socio-political issues.

The CLC aims to improve the lives and futures of its Aboriginal constituents through sustainable development and change. The CLC's development approach is based on an integrated and strengths-based strategy of building economic, social and cultural capital. Significant work is being done under the various functions of the CLC in each of these related areas through initiatives in: natural and cultural resource management; the development of remote enterprise and employment pathways; innovative community development work, ensuring land owners use income generated from land use agreements for broad community benefit; and land administration and land use agreements for third parties and traditional owners.

The CLC's primary concerns in submitting the following comments on the draft EIS are to highlight traditional Aboriginal owners' and/or Native Title Holders' connection to the affected land and to ensure the protection of significant sacred sites and cultural interests on the land affected by the project. The protection of the environment is integral to Aboriginal attachment to country. Furthermore, the CLC wishes to ensure that social and economic benefits from the project are distributed for the benefit of traditional Aboriginal owners and local communities.

The CLC has had a working relationship with Verdant Minerals Limited and related entities for many years under negotiated exploration agreements. Exploration updates have been held annually and sacred site clearances conducted in relation to exploration activities. Consultation meetings have been held with Native Title Holders in relation to the Mineral Lease applications, most recently in October 2017 to discuss the information in the draft EIS. Company representatives attended the meeting to discuss the proposal, environmental impacts and answer questions. A sacred site clearance has been conducted in relation to the proposed infrastructure corridor, linking the mine to the Alice Springs to Darwin railway and Amadeus to Darwin gas pipeline. The Project is located on areas the subject of the Sandover and Neutral Junction Native Title Determinations, dated 14/10/2014 and 13/7/2011 respectively.

General Comments

Without the numerous appendices, the EIS presents an optimistic view, not reflecting the uncertainties and risks that are involved. Throughout the EIS it is clear that Verdant expects a minimal impact of mining phosphate at Ammaroo.

The EIS is, although lengthy and repetitive in parts, mostly non-technical in its language and an easy read. However, some statements such as sample depth and individual radioactivity level are not backed up by data in the appendices. Conclusions and models are often based on a limited number of data points in close proximity of the Mine area.

The identified risks for surface water flows during flooding events (potentially affecting the mine site), groundwater bore drawdown and geochemical analysis may be skewed, reflecting data east and south-east of the 25 year mine life footprint. The data for the infrastructure corridor is also limited, especially for flora and fauna.

The mining agreement is expected to have provision for protecting the wide range of Aboriginal interests impacted by this Project, but the best environmental protection will be afforded through conditions attached to the mining approval issued by the Northern Territory Government. Feedback from Native Title Holders on the EIS is crucial so their views, concerns and recommendations can be considered as part of the EIS process. In this submission, the CLC presents comments related to Native Title Holder issues and concerns, collated from consultations in relation to the Project over a number of years, and in particular from discussions at the recent meetings in Ampilatwatja and Imangara (Murray Downs) on the 18th - 19th October 2017, where details in the EIS were presented.

Native Title Holders have been aware of the Project for a number of years with the mining concept introduced during the exploration phase as early as 2012 and 2014. However, understanding the Project is a learning process for Native Title Holders as more information becomes available. Information about the mining proposal and infrastructure corridor with respect to environmental impacts only became available some weeks ago with the release of the draft EIS, which was presented to Native Title Holders for the first time in mid-October 2017.

History, government policy and legislation have influenced land tenure for the Ammaroo, Murray Downs and Neutral Junction areas. There has been recognition of Aboriginal identity with the land through Native Title rights rather than the *Aboriginal Land Rights (Northern Territory) Act, 1976* (ALRA) due to pastoral holdings. Native Title Holders have the same association to the land as their 'Traditional Aboriginal Owner' counterparts in terms of cultural responsibility, obligations and attachment, but they do not have the same legal rights nor decision-making power.

With respect to the Ammaroo Phosphate Project the Native Title Holders have the 'right to negotiate' only and were not asked to consider the implications of such a Project for their Native Title rights at the exploration phase with the power to decline the impacts. These limited rights are the foundation of the relationship of Native Title Holders with the company and the Project.

Native Title Holders have consistently stressed that if the Project goes ahead, sacred sites must be protected. Also, that Aboriginal culture and traditions are respected, and that they and their communities should benefit from the Project. Training, employment, compensation and improved community infrastructure are all important as people aspire to have their lives enhanced by the Project, not diminished.

Specific Comments

Sacred Site Protection

- A key CLC function under the ALRA is to assist Aboriginal custodians in the protection of sacred sites on land in the area of the Land Council (whether or not Aboriginal land) (s.23(1)(ba)). The CLC has conducted sacred site clearances in the area of the phosphate deposit for exploration activities and recently over the proposed infrastructure corridor. Numerous 'exclusion zones' protecting sacred sites have been provided to the company. The CLC requested that this sensitive and confidential information be treated carefully in the EIS and that sacred site protection information and the location of archaeological material be either removed from maps that will be subject to the public version or for those chapters to be closed to the public.
- It is stated that 'No direct impact to CLC exclusion zones is predicted (Chapter 3.1). Under a comment in line item 51 of the Risk Register, it is noted that '(T)here are 2 major sacred sites in the Mineral Lease and 1 near the actual mine location' , and that '(T)here are no soaks by the Project footprints'. These statements are incorrect and misleading. There are 7 identified sites and 1 grave site within the Mineral Lease Application areas. Two of the sacred sites are soakages, one of which will be directly impacted by the mine footprint. A-total of three sites are located within the mine footprint and two sites are located in close vicinity to the proposed realignment of the Murray Downs road. It is noted that a sacred site clearance for the Mineral Lease applications is planned for early 2018. Native Title Holders have asked for ongoing access to sacred sites surrounded by and in close proximity to the deposit – this will be a matter for further discussion under the agreement negotiations.

Archaeological Material

- Archeological sites and artefacts have been identified in relation to the Project area. This material is of cultural interest to the Native Title Holders who wish to be consulted about and to participate in the management of this material. The EIS states that a Cultural Heritage Management Plan will be designed which should also enable consultation and participation by Native Title Holders.

Water

Groundwater

- Community residents of Ampilatwatja and Native Title Holders have expressed concern about threats to their potable water supplies as a result of the Project, both from drawdown and possible contamination.
- The executive summary should clearly state how much water is proposed to be used by the Project per year. It mentions cubic meters/hour, which is hard for an average reader to put into any kind of context. The report should clearly state that use of over 4 GL/year for 25 years is planned. The figure can be found in the 60 page technical report in Annexure H (section 5.1.1).
- The Company acknowledge that the water resource it plans to use from the Georgina Basin is connected to the Dulcie Sandstone and that this formation contains a significant aquifer yielding potable quality water. Yet they do not address any effects on the Dulcie aquifer that such planned extraction from the Georgina Basin may have.
- A drawdown of up to 2.7 m is predicted at the Ampilawatja community bore-field and up to 3.7 m at the nearest pastoral bore. Over a 25 year period, the CLC seeks clarification as to whether there will be significant additional costs required to pump water from those depths and if current yields (in L/s) will be obtainable?
- The Report state that there are no Groundwater Dependent Ecosystems (GDE) in the study area and that the area is not covered by the Commonwealth Atlas for potential GDEs. This last statement is misleading. It could be taken to mean that the Atlas indicates there are no GDEs present, when in fact it means no data in the region has been analysed. The report makes the assumption of no GDEs based on the depth of groundwater (i.e. it is too deep to support GDEs). However, a mapping study similar to that done by Water Resources for the draft Western Davenport Water Allocation Plan, with ground truthing, is preferred to support the view.
- The study seems to criticise the volumes of water for allocation in the Western Davenport Water Control District to industry, agriculture and SIR (Strategic Indigenous Reserve – also known as Strategic Aboriginal Water Reserve). It comments that the proportion allocated to industry is ‘surprisingly low’. Yet these allocations are based on the priorities of stakeholders and the requirements for maintaining GDEs and cultural sites based on modelling done by Water Resources.
- Clarification is required in relation to the Mine Staging Plan. It notes 25 years for the Plan (which we understand is the proposed mine life) yet the map also shows a 30 year pit shape (Vol 1. page 25), and yet another 40 year pit shape (Appendix I figure 4-1 and 4-2 pp 22-23). What are the comparative differences in water use (and other impacts) of a 25 year mine compared to a 40 year mine?
- The methodology calculation needs to be provided to enable cross checking of the

results. The report states that the overall water balance error is less than 0.1% (Appendix H. Chapter 4.3) however information showing how this value is calculated has not been provided.

- Clarification is sought on the impact and monitoring processes in relation to the tailing liquor seeping from storage in the mine pit to the groundwater table. It is stated that this will result in some increase in groundwater level and change to the chemical composition of groundwater (Appendix H. Chapter 5.1.4), yet it is unclear how this would come about and how will it be monitored.

Surface water

- The area covered by the Hydraulic model (Appendix G. Figure 3-5) does not cover the full areal extent of the Mineral Lease Applications. The gap coincides with the adjoining Infrastructure Corridor, which together with the elevated processing plant and levees are expected to divert water from the north. Figures that were chosen for the summary on surface water (chapter 7) in the EIS does not show this. The modelling done pays little attention to the effects on the re-routed road to Murray Downs. To address this deficit, the CLC requests that the re-routed road is included in the amended Water Management Plan.
- The Report does not provide a clear explanation on the water treatment when there are extreme floods events. It states that during such extreme flood events, “all reasonable efforts will be made to avoid discharging of process water.” It also states that transfer to open cut pits is left as an option. The CLC seeks clarification as to what treatment this water will be subject to before that would happen?
- The report misleads the reader as to how the Tailing Storage Facility will operate. In the document, reference is made to an article (Worley Parson, 2014) that supernatant water can be reclaimed from tailing thickening (Appendix G. 4.3) among which recycled water from the tailings thickener is listed as an available water resources. However, the Report also states that ‘water from the Tailings Storage Facility will not be recycled.’ Placing this narrative is misleading as it presents a method that is not to be used in practice. The CLC seeks clarification as to what the actual methods will be in managing supernatant water from the Tailings Storage Facility.

Traditional Practices

- Traditional hunting and gathering practices are important for the Native Title Holders and Traditional Owners of the land. Hunting and gathering practices will be impacted by the Infrastructure Corridor, as crossing the railway line will be difficult. As the project progresses, consultation with Native Title Holders is requested to discuss possible crossings for continued ease of access to important hunting grounds.

Transport issue – sharing the road

- During the construction phase of the Project the company intends using the Murray Downs Road for access to the Project area. The road is the main access to Ali Curung and Ampilatwatja. Traditional owners and community members have raised concern about the safety given heavy vehicle use and the current condition of the road, especially on the Murray Downs Road and the single strip of bitumen to Ali Curung.
- The Report states that the Company will ‘go through appropriate measures to confirm conditions and criteria to determine controls required for crossings’ (Vol 1. Chapter 2.8.2). While it is noted that the Company’s recognition of this issue is noted in the Risk Assessment, the CLC maintains its concerns as to the lack of attention given to the risks to local commuters and wishes to be informed throughout the process of the Project on the suggested upgrade and improvements to road conditions.
- Native Title Holders and affected community members are worried that increased usage of heavy vehicles without mitigation will deteriorate the road quality. The CLC is also concerned by the uncertainty surrounding planning for the rail spur. The EIS indicates that a Haul Road along the same route as the Infrastructure Corridor will remain an option, particularly for the first 5 years of production (Vol 1. Chapter 2.8.). It is stated (in 2.8.2) that it will be used for transport during construction of the railway. If there are complications such as delays during constructions of the railway or the Mine, the CLC advocates for this alternative route to be used to ease transportation on the public roads.
- Excessive dust during use of the Murray Downs road has been raised particularly by residents at the Imangara community and Imperrenth outstation located to the north-west of the Project area. Verdant has told Native Title Holders that they are willing to discuss sealing roads near communities. The CLC reiterates that these are the wishes from the Native Title Holders.

Flora and Fauna

- The CLC is concerned about the impact on fauna by the Infrastructure Corridor and the Mineral Lease areas. The Native Title Holders believe there are Bilbies in the Project area and the CLC can share data that supports this view. Map 2017-412, attached in Appendix 1 shows, the Infrastructure Corridor and MLAs bisect part of the known range of the Greater Bilby based on CLC and NT Species Atlas records (e.g. known population from records up to 2010 on the railway line near Illeuwurru and other records from further north and east). In addition there are records close to the eastern boundary of the MLAs closer to Ampilatwatja.
- The conclusions in the Report are of a different sort e.g. ‘... the lack of evidence supporting the presence of the species, and also the absence of suitable refuge habitats (and known populations) in the region, indicate a low likelihood that Greater Bilby occupy these desert sandplain areas ...’ However, statements like that are contradicted

by, e.g. ‘... long-term seasonal home range of a group of Greater Bilby may be large (up to hundreds of square kilometres) ...’ indicating there is a strong possibility that Bilbies would occur or access the area impacted by this proposal.

- The EIS notes ‘... Three predator species, including foxes and cats, were identified within the project area are a concern. Predation is a major threatening process to the Greater Bilby ...’ Given the identified presence of Bilbies in proximity to the Infrastructure Corridor and that linear corridors are known to become vectors for predator dispersal, the CLC recommends greater consideration be given to potential impacts on Bilbies (e.g., restricting range movement, predation). Further, the CLC recommends that a more extensive and targeted tracking survey be carried out by an experienced Bilby survey team with the view to developing an appropriate management response as needed. In addition, other significant species (e.g. marsupial mole, Golden Bandicoot) are proximal to the proposed transport corridor as well as the large areas in close proximity to the Project area, with ‘no data’.
- Operational staff may need training to identify threatened flora and fauna, as well as reporting encounters of flora and predators by users of the infrastructure corridor (observation and kill log).

Operational Matters

- Pollution is a concern in relation to the mining proposal. The Company states that ore and waste rock are expected to hold radiation levels equal to $1 \mu\text{Beq}/\text{m}^3$. Appendix K contains an Executive Summary of Radiation considerations. However, the full radiological impact assessment (RIC) Report referred to in the EIS should have been included in the EIS so the figures can be reviewed. The EIS includes the AMD assessment and management plan in Appendix I with numerous geochemical analysis included. It is inconsistent to exclude the Radiation Assessment Report. Further, amounts of radioactive elements in the product have not been considered following beneficiation.
- The EIS Report indicates that the primary filtration treated water will use sand filters (Vol 1. 2.10.1). The CLC seeks further information as to the source from which this sand will be obtained and where it will be disposed of after being used.
- Information in the EIS regarding dust pollution is considered deficient. For assessment of modelled data the Report uses the Criterion by EPA Victoria from 2007. PM_{10} concentration from mine activities and potential background is expected to be below $60 \mu\text{g}/\text{m}^3$. The Report states that the air pollution regulation allows for PM_{10} $60 \mu\text{g}/\text{m}^3$ during an averaging period of 24 hours (Vol 1. 2.12 and Table 2-15, Table 15-3 and Figure 15-3). The CLC seeks clarification as to why the assessment is not based on the standard of pollutants put by the NEPC (The National Environment Protection (Ambient Air Quality) Measure (NEPM) Feb 2016, Table 1).
- This Federal document puts the maximum concentration standard at $50 \mu\text{g}/\text{m}^3$ per 1

day. Further, Figure 15-4 needs clarification. The Figure has two contours plotted across the Mineral Lease area. As mentioned in 15.4.1 one of these is the $60 \mu\text{g}/\text{m}^3$ but there is additionally a contour closer to the plant and across the re-routed road with a $100 \mu\text{g}/\text{m}^3$. Whilst the Report notes that there remains some risk of non-compliance, the CLC seeks clarification as to how this contour complies with guidelines.

Rehabilitation

- It is stated that there is currently no allocation in the water balance (Figure 2.9) for recycling the water from the tailings facilities. The Report assumes that seepage from tailings is minimal due to the finely ground nature of the tailings and most moisture being lost through evaporation. However, this position is later contradicted with the statement: 'The TSF facilities (surface and in-pit) will be designed to include water recovery (estimated to be approximately 20-30% of the water discharged in the tails to the TSF) from collection ponds using a decant or floating pump station.' (Vol 1. Chapter 2.6).
- The TSF embankments will be constructed from silt/clay fill but the tailings will not be lined. After the first 24 hours the tailings are assumed to be 40% water. It is stated that expected tailings will be consolidated to a dry density in the order of $0.7\text{t}/\text{m}^3$ to $0.9 \text{t}/\text{m}^3$ over a period of several years (2.6.2). Once the tailings are sufficiently stable they will be capped with a layer of waste rock up to approximately 1-2 m higher than the surrounding land. The CLC seeks further information on what dry density would be sufficiently stable to start the capping process, including the proposed density it will be capped at. Further clarification is required from the implied expectation of 'several years' before capping which could be inconsistent with the mapped mine stages of 4 years.
- The EIS states that poly acrylamide flocculants will be used more than once in the processing (Vol 1. Chapter 2.5.8). It is used as a thickener (among others for dewatering) and traces will undoubtedly end up in the tailings storage. The CLC seeks information as to the effects (if any) on tailings stability / dewatering and the environment through the use of the flocculants. Further, will other flotation chemicals and water treatment chemicals set out in Table 2-8 have an impact on tailings stability and on the environment. Importantly, we seek clarification as to monitoring of groundwater in areas adjoining the Project area that could be affected by tailings seepage, particularly for chemical contamination.
- It is stated that one sample of synthesized tailings was analysed for total metals, sulphur, NAG and NAPP. Furthermore, when compared to the waste rock, it had slightly elevated metals and fluoride but was low in salinity and was non-acid forming. Additionally, uranium content is also shown to have low values. It remains unclear from the EIS as to how one laboratory sample can be used as representative and sufficient to draw any scientifically sound conclusions. It is also noted that sample locations mostly cover the eastern part of an outlined 40 year extent of pit (Appendix I. 4.2.2). Only a handful of the tested samples fall within the area of the first 5 years of mine

stage activities. The EIS also states that samples are from various depths. However, there is no data provided on the depths in the sample tables. The CLC asks for these shortcomings to be addressed in the Supplement to the EIS. More robust data would be beneficial for the CLC in order to properly consider the long term impact of this mine.

- We agree with the advice of GHD that given the rarity of pre-mining tailings samples, any trial tailings solids and liquor samples should be subject to the full suite of geochemical monitoring for waste rock and leachate listed in section 6.3.2.

Employment

- As stated in the general comments section above, if the Project is to proceed, Native Title Holders and local community members wish to benefit from employment opportunities generated by the Project. The CLC notes that: 'Some of the local workforce may work an alternative roster to fit work and community needs' (Vol 1. Chapter 2.12.1.). The CLC requests information as to whether there is an understanding of the type of jobs to be available at the mine and an estimate of how many positions this may involve.
- On work opportunities for people living in the nearby communities the EIS estimates that 20% of employment opportunities. The CLC suggests that a training plan is developed to make these estimates into goals.
- We highlight the statement in the EIS regarding community consultation in Ampilatwatja, which states the consult was cancelled although 'key stakeholders and community members' were spoken to. There are no reports on attempts to follow-up with these community members to reschedule another meeting. The Native Title Holder Meetings organised by CLC between 2011 and 2016 (referred to in the EIS) were regarding exploration matters and by their nature did not include other community members. The EIS also states that another meeting at Barkly Regional Council was cancelled and moved to August 2017. There is no note as to whether the matter was followed up afterwards.
- In the summary on Workforce and accommodation in the main EIS draft submission (Chapter 2.12) it 'estimated that jobs could comprise; 20% local (Alyawarre communities across the Barkly and Tennant Creek)'. Yet, other statements from the Company in the Report give little hope to people in communities who may be unemployed and are willing to get certificates, or already have skills. This is the case given that in the Report it states that 'Verdant is more likely to recruit workers already in jobs than make an immediate dent in the unemployment queues.' The CLC also questions using statements that generalise community members, e.g. '... poor skills and a lack of experience in the workforce (particularly with long shifts), poor English ...' (Vol 1. Chapter 12.3.3). The Company should consider how they value using staff who live close to the Project and thereby may become long term assets to the Project.

Corrections

- Imperrrenth is situated to the north-west of the Project area (not the south-west, Appendix G, 3.1).
- Link error to Figure 5-1, 6-1, 6-2, 6-3, 6-4, Table 6-5, Table 6.6, Table 6-7, in List of Tables and figures (Appendix I)
- Link error to reference in Appendix H, 7.4
- Link error to reference in Appendix I, 1.4.3, 1.4.4,
- Link error to reference in Appendix O, 4.5

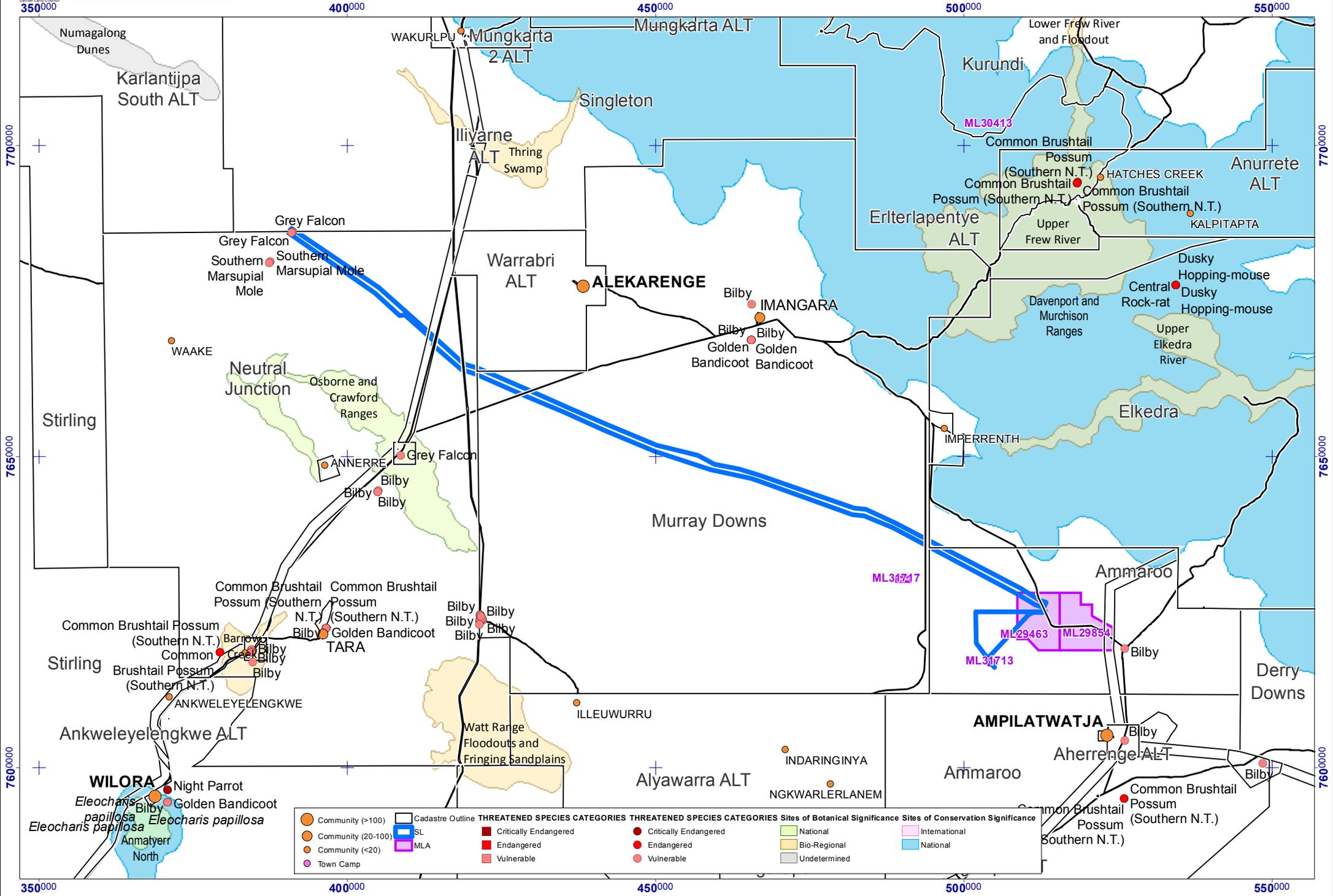
Attachment

Appendix 1: CLC Map 2017-412

End of submission



Ammaroo Phosphate Project - Biodiversity



Community (>100)	Cadastre Outline	THREATENED SPECIES CATEGORIES	Critically Endangered	THREATENED SPECIES CATEGORIES	National	Sites of Botanical Significance	International
Community (20-100)	SL	Critically Endangered	Critically Endangered	Endangered	Bio-Regional	Bio-Regional	National
Community (<20)	MLA	Vulnerable	Endangered	Vulnerable	Undetermined	Undetermined	
Town Camp			Vulnerable				