

Submission to the NT Environmental Protection Authority:
Draft Terms of Reference:
Rehabilitation of the Former Rum Jungle Mine Site

3rd March 2017



Environment Centre NT

protecting nature | living sustainably | creating a climate for change

Introduction

Environment Centre NT (Inc) is the Territory's leading community environment group.

The mission of the Environment Centre NT is to

- protect and restore biodiversity, ecosystems and ecological processes,
- foster sustainable living and development, and
- cut greenhouse gas emissions and build renewable energy capacity.

The Environment Centre NT works by

- advocating for the improvement of environmental policies and performance of governments, landholders, business and industry;
- partnering on projects and campaigns with conservation and climate organisations, governments, Indigenous organisations, community groups, businesses, and landholders;
- raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact;
- supporting community members to participate in decision making processes and action;
- recognising the rights, aspirations, responsibilities and knowledge of the Territory's Indigenous peoples; and,
- acknowledging that environmental issues have a social dimension.

For 35 years, ECNT has positively contributed to the development of environmental laws and policies in the NT, provided a voice for the community on environmental issues , educated community members about how they can reduce their environmental impact and put forward innovative and well-informed projects and policies.

Response to the Draft terms of Reference: Rehabilitation of the Former Rum Jungle Mine Site

Adequate funding required for best outcome

ECNT welcome the federal government's commitment to ongoing rehabilitation of the legacy left by mining and subsequent activities at Rum Jungle. ECNT are acutely aware of the flaws of previous processes that saw Commonwealth agencies seek to minimise their responsibilities to address the legacy of the Territory's first uranium mine. We welcome the fact that this project demonstrates genuine cooperation between the Commonwealth and Territory government, with adequate funding to offer the best opportunity yet for effective rehabilitation.

ECNT not alerted to the publishing of draft Terms of Reference

ECNT recognise contribution to EIA as core business, we see Rum Jungle as one of our legacy campaigns, and we acknowledge the significance of this early stage of the process. So it's unfortunate that such a large body of detail has been presented for comment over a period of only two weeks. Despite our participation in the Stakeholder Advisory Group, we were not alerted to the publishing of the draft Terms of Reference. Unfortunately this does not allow us to give the level of scrutiny to this important stage of assessment as this project deserves. Nonetheless we appreciate the opportunity to share these comments.

Finnis River Floodplains

ECNT welcome the recommendation to include floodplain sediment sampling in the impact assessment of downstream values (cf: attachments L, M). We remain alert that this project should give due attention to the Finnis River floodplains. While not initially in the project scope, it does appear that this will be the Territory's best chance at federally funded rehabilitation, and it would be disappointing to ignore significant legacy contamination.

Rehabilitation Strategy

Sections **2.2.1 rehabilitation strategy**, regarding rehabilitation objectives for the Project area, and the and relevant specific sections (ie **4.3.1 Rehabilitation Success, 4.5.1 Water and 4.8.1 Radiation**) should include quantitative standards for radiation and water quality. Given the context, it is inadequate and inappropriate to merely cite ALRA: to be meaningful, we need to set agreed standards of acceptable limits post-work.

Acknowledge previous failures and provide strategies to improve

In addition to the boilerplate of section **2.4 environmental history**, it would be useful and appropriate to include a summary of relevant features of previous failed and incomplete attempts by both governments at rehabilitation and management of legacy contamination. In particular, noting that the scoping determination identified concerns associated with acid-metalliferous drainage (AMD), the report should discuss the failure mode of previous designs, and outline strategies for improved performance of capping and seepage management.

Works outside the project area

The standard requirement for **2.5 alternatives and justification** should discuss consideration of relevant works outside the project area

Renewed mining

The same governments pursuing this welcome co-operative focus on rehab assessed (and in some cases approved) relevant applications for renewed mining in the rum jungle region. So when we come to **3.1 environmental legacy**, let's also acknowledge recent attempts by resource operators to pursue new mining in the locality.

Water Monitoring

Section **4.5 water** should describe assessment and monitoring for downstream water objectives, given the determination identified both *Potential ongoing contamination of downstream waters* and *downstream water quality impacts*.

ECNT remain keen to participate further at every stage of assessment of this important project and we look forward to receiving future alerts related to this matter.

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