

Our ref: 20172622:ATH

30 April 2018

By Email: AboriginalLandCommissioner@network.pmc.gov.au

Aboriginal Land Commissioner
Office of the Aboriginal Land Commissioner
GPO 9932
Darwin NT 0801

Dear Commissioner Mansfield

REVIEW OF DETRIMENT ISSUES – MARIA ISLAND AND LIMMEN BIGHT RIVER LAND CLAIM NO 71 AND PART OF MARIA ISLAND REGION LAND CLAIM NO 198

I write on behalf of Northern Territory Iron Ore Pty Ltd (**NTIO**), who seeks to participate in the review of detriment issues for the Maria Island and Limmen Bight River Land Claim No 71 and part of Maria Island Region Land Claim No 198 (**Land Claim**), as contained in the Aboriginal Land Commissioner's Report of March 2002 (**Land Claim Report**). NTIO recently acquired tenure to a Special Purpose Lease (**SPL**) and would suffer detriment if the Land Claim is granted. NTIO did not specifically receive an invitation to participate. It is our understanding, though, that the Aboriginal Land Commissioner (**Land Commissioner**) is still accepting correspondence on the matter. I am writing to inform you of NTIO's concerns and ask for additional time in which to provide a more detailed response.

Party status and interest

NTIO is the holder of SPL 219, located adjacent to the southern bank of the Roper River in the Port Roper area. The SPL is part of a project known as the Roper Valley Iron Ore Project (**Project**) currently undergoing environmental assessment by the Northern Territory pursuant to the *Environmental Assessment Act*. The Commonwealth has also determined that the Project is a Controlled Action under the *Environment Protection and Biodiversity Conservation Act 1999* and has advised that the Project is to be assessed by the Northern Territory Environment Protection Authority under the bilateral agreement between the Commonwealth and the Northern Territory.

Terms of Reference for the Project were issued by the Northern Territory Environmental Protection Agency in November 2017. The intent of the Project is to transport mined product from NTIO's mineral leaseholds further west to a storage and loading facility at SPL 219 from where product will be barged down the Roper River into the Gulf of Carpentaria for trans-shipment to ocean going

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vessels to take the product to market.

The Project and use of SPL 219 may be affected by the Land Claim. In particular, The Land Claim Report at paragraph 13 (e)-(f), page 6, identifies as part of the application for the Maria Island Region Land Claim No 198 'Part of the beds and banks of the Roper River [and] a large area seaward of the low water mark of the mainland'. The maps accompanying the Land Claim Report, though, do not appear to show the extent of the claim.

Jurisdictional issues

Before reaching the issue of detriment, there are two other issues we ask be addressed. First, at paragraph 13, the Land Commissioner noted that 'Current judicial opinion is that land seaward of the low water mark which is not exposed at low tide is not available to the [sic] claimed (*Risk v Northern Territory* 105 FCR 109)'. That issue has now been fully resolved. Pursuant to the High Court decision in *Risk v Northern Territory* [2002] HCA 23, the seaward land is not land in the Northern Territory, and thus not available to be claimed.

Second, there appears to be a conflict over some of the claimed area between this Land Claim and the Lower Roper River Land Claim No. 70 (Report No. 65) (**Lower Roper Claim**). The Lower Roper Claim includes 'All the beds and banks of, and the islands in, the Roper River in the Northern Territory of Australia from the Roper Bar (at approximate coordinates 134 degrees 30 minutes east and 14 degrees 42 minutes south) in the west to the seaward extremity of the Roper River in the east'. The Lower Roper Claim Report did not issue until a year after this Land Claim Report, but the application in the Lower Roper Claim was filed much earlier.

Intervening factors

In addition to the two issues identified above, NTIO's acquisition of SPL 219 and the planned Project are intervening factors which should be taken into account in the detriment review.

Given NTIO's recent acquisition and approval there have been no direct negotiations or agreement between the NLC and NTIO in relation to the land claimed becoming Aboriginal land and how to address the significant issues of detriment to NTIO.

Closed Seas

The issue of closed seas should also be taken into account in the detriment review. A grant of Aboriginal land over the Maria Island and Limmen Bight River Land Claim or part of the Maria Island Region Land Claim would enable landowners to make an application under s12 *Aboriginal Land Act* (NT) for closure of the seas adjoining and within two kilometres of the area granted.

The proposed project is reliant on access to the Gulf of Carpentaria for trans-shipment loading of the product to waiting vessels. If the seas were closed in the area around the Roper River, NTIO would not be able to go ahead with its proposed project.

NTIO could seek a grant of a permit under s14 *Aboriginal Land Act* (NT) to mitigate the impact of closed seas; however, there is no guarantee that a permit would be granted. If a permit were not granted, NTIP may rely on a right to 'bona fide transit of a vessel through seas which are otherwise open to that vessel.' There has been no testing of the right, though, and there is no certainty that vessels leaving the Roper River would be able to rely on it if they were come into contact with closed seas.

Detriment

Use of SPL 219 to load barges in the Roper River is critical to the financial viability of the Project. There is no other economically feasible way of delivering ore to market. Any financial conditions or restrictions on the use of SPL 219 for its intended purpose could prevent the project from coming to fruition.

Thank you for your attention to this matter and I also thank you in advance for providing additional time in which to provide further information.

Yours faithfully
WARD KELLER



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11 May 2018

By Email: AboriginalLandCommissioner@network.pmc.gov.au

Aboriginal Land Commissioner
Office of the Aboriginal Land Commissioner
GPO 9932
Darwin NT 0801

Dear Commissioner Mansfield

RE: REVIEW OF DETRIMENT ISSUES - MARIA ISLAND AND LIMMEN BIGHT RIVER LAND CLAIM NO 71 AND PART OF MARIA ISLAND REGION LAND CLAIM NO 198; LOWER ROPER RIVER LAND CLAIM NO 70

I write on behalf of Northern Territory Iron Ore Pty Ltd (**NTIO**), with respect to the review of detriment issues in two matters before the Aboriginal Land Commissioner:

- Maria Island and Limmen Bight River Land Claim No 71 and part of the Maria Island Land Claim No 198 (**Limmen Bight/Maria Island Land Claim**) as contained in the Aboriginal Land Commissioner's Report of March 2002; and
- Lower Roper River Land Claim No 70 (**Lower Roper Land Claim**) as contained in the Aboriginal Land Commissioner's Report of March 2003.

When referring to the land claims collectively I will simply refer to them as the Land Claims.

NTIO is the proponent of the Roper Valley Iron Ore Project (**Project**), which will suffer detriment if either of the Land Claims are granted. This correspondence is a follow-up to two letters provided to the Aboriginal Land Commissioner from Ward Keller on 30 April 2018 with regard to the Limmen Bight/Maria Island Land Claim and on 3 May 2018 with regard to the Lower Roper Land Claim. This correspondence provides more detail about the Project and updates the detriment that may be suffered if either of the Land Claims is granted.

The detriment will be virtually identical under either of the Land Claims, so the detriment review for both will be addressed in this letter. As noted in the earlier correspondence, however, I ask that the jurisdictional confusion between the Land Claims be addressed in Commissioner's final reports.

The Project can be thought of as an integrated linear project stretching for over 100 kilometres west from the mouth of the Roper River in and along the Roper Valley. Even though the Land Claims affect only one component of the Project

Detriment Review follow-up Limmen Bight and Lower Roper LC.docx - F1159764.docx

near the mouth of the Roper River, discussing the Project as a whole places the detriment in a fuller context.

The attached map from the Notice of Intent for the Project (Annexure 1) provides visual representation of the Project's geographic breadth. At the western end of the Project are a number of mineral tenements located 100-150 kilometres east of Mataranka. One of the major deposit areas is located approximately 15 kilometres west and north of Minyerri. The other is located approximately 50 kilometres west of Ngukurr. Iron ore will be transported from the mining areas via existing roads that will be upgraded as part of the Project, primarily Hodgson River Road, Roper Highway, Nathan River Road, and Port Roper Road, to a Barge Loading Facility (**BLF**) at SPL 219 near the mouth of the Roper River. Iron Ore will be loaded onto the barges at the BLF and transhipped to ocean going vessels some 40 kilometres offshore in the Gulf of Carpentaria.

In some respects, the project is a successor to what was known as the Sherwin Iron Ore Project (**SIO Project**). In March 2013 Sherwin Iron received approval of a Mining Management Plan from the Northern Territory Government for the extraction of 200,000 tonnes of bulk iron ore sample from one of the tenements now owned by NTIO. Bulk sample mining commenced in June 2013 and the ore was trucked to Darwin for export through the Port of Darwin. The first iron ore shipment left Darwin in September 2013.

Over the subsequent several months further approval for larger bulk samples were obtained and four additional shipments of 273,000 tonnes were made. In July 2014, however, Sherwin Iron encountered financial difficulties and went into voluntary administration, and the SIO Project went into care and maintenance.

NTIO acquired Sherwin Iron's assets in September 2016. Those assets, though, did not include SPL 219. That was acquired from a different entity in March 2017.

The Project is different enough from the SIO Project that its own environmental assessment is required pursuant to the *Environmental Assessment Act* (NT), an assessment that is currently underway. As noted in the earlier correspondence, the Commonwealth has also determined that the Projected is a Controlled Action under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) and has advised the Northern Territory Environmental Protection Authority (**NTEPA**) that the Project must be assessed by the NTEPA under the bilateral agreement between the Commonwealth and the Northern Territory.

The life of the mine is expected to be more than 20 years, with the mineral resource (Direct Shipping Ore) estimated to be greater than 40 million tonnes at 58% Fe. The Project includes improvements to approximately 235 kilometres of existing roads, including widening and sealing some sections of the roads and works to improve wet season access conditions.

The BLF at SPL 219 will include berthing piles driven into the river bed adjacent to the riverbank. Barges will moor along the berthing piles to be loaded before being towed to sea for transhipment.

The macro-level detriment is the most obvious. A grant of either of the Land Claims could prevent operation of the Project. While the BLF may look like it is only a small component of the Project, it is amongst the most critical to the Project's viability. There is no other cost-effective means to get the resources to market. Anything that prevents or makes more costly transport of the ore has the potential to put the Project in jeopardy.

Putting the Project at risk means putting the jobs that will be directly generated by the Project at risk. Table 4.1 in the Notice of Intent for the Project (Annexure 2) indicates 200-400 jobs

will be directly created during the construction phase of the Project, with operation of the Project directly resulting in 150-300 jobs.¹

The investment NTIO has made and the further investment of over \$250 million it intends to make in the Project would also be placed in jeopardy.

Regional economic opportunity would also be placed in jeopardy. The improvements planned for the road network will be to public roads, improvements that will increase safe and reliable access through the Roper Valley. A grant of the Land Claim places these road improvements at risk because the improvements are part of the Project.

NTIO has, in consultation with the Northern Territory Government and with the support of local communities, taken a deliberate decision to pursue a transport and logistics solution for the Project that involves the upgrade and use of public roads to transport iron ore products to the BLF. These roads will be built to appropriate public road standards and be made available for use by both the Project and the general public.

The roads to be sealed and upgraded as part of the Project development include:

- Approximately 40 km of the Roper Highway from the current end of the bitumen seal at Fizzer Creek to the start of the recently completed high level bridges at Roper and Wilton rivers (built at a cost of \$50 million);
- Approximately 85 km of the Nathan River Road to the Port Roper Road turnoff; and
- Approximately 45 km of the Port Roper Road.

These roads not only link remote Indigenous communities with the Stuart Highway, but in the case of the Roper Highway and Nathan River Road, form part of the Savannah Way, described in numerous tourist publications as "*Australia's Adventure Drive, linking Cairns in Tropical North Queensland with the historic pearling town of Broome in Western Australia's Kimberley, via the natural wonders of Australia's tropical savannahs and the Northern Territory's Top End.*" The Port Roper Road provides the only road access to the mouth of the Roper River, an important site for traditional, commercial and recreational fishing activities.

Yours faithfully
WARD KELLER



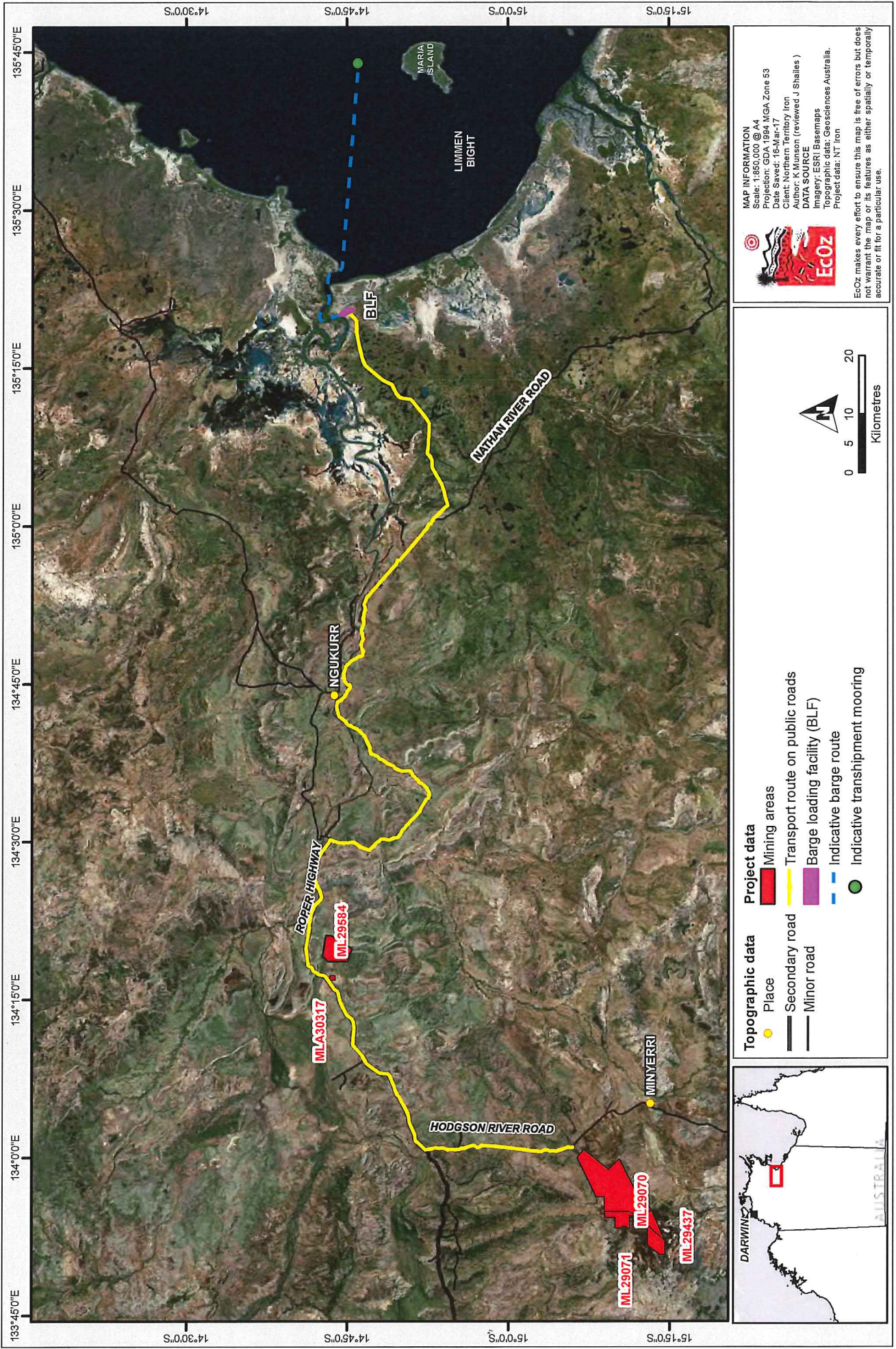
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¹ The entire Notice of Intent is available on the NTEPA website at https://ntepa.nt.gov.au/data/assets/pdf_file/0008/453158/noi_roper_valley_iron_ore.pdf.

Annexure 1



Path: Z:\01 EcOz_Documents\04 EcOz Vantage GIS\NT Iron Ore\EZ16141011 Project Files\Detailed location.mxd

Figure 3. Location of project components

Annexure 2



4 Project Description

This section provides a detailed description of the activities proposed as part of the project.

4.1 Project overview

The project will involve the following main elements:

- open pit mining at Deposits C, W and X
- ore processing
- road transport to a BLF
- barge loading and transshipment to OGV
- supporting infrastructure and services.

An overview of key project components is provided in Table 4-1. Additional feasibility studies have commenced, the results of which will inform more detailed project planning.

Table 4-1. Project components and associated detail

Component	Overview
Proposed Construction Commencement	Q2 2018 (constrained by timely receipt of approvals)
Proposed Operation Commencement	Q2 2019
Life of Mine	>20 years
Mineral Resource (Direct Shipping Ore)	>40 Mt @ 58% Fe
Mineral Resource (In Situ)	>490 Mt @ 42% Fe
Marketable Iron Ore	150 – 300 Mt @ 56 – 58 % Fe
Production Rate (Direct Shipping Ore)	2 – 6 Mtpa
Production Rate (Low Grade Ore)	2 – 6 Mtpa
Beneficiation Process	Crushing ± grinding ± size separation ± gravity separation ± magnetic separation
Process mass yield	40% – 70%
Combined DSO + Concentrate Output	2 – 10 Mtpa
Project Water Demand	300 ML/pa to produce 2 Mtpa Direct Shipping Ore Only (minimum water demand) 2,000 ML/pa to produce 6 Mtpa of Iron Ore Concentrate (maximum water demand)
Project Water Supply	Harvested surface water flows and recycled water ± groundwater bores
Mining Method	Open Pit with some waste backfill
Strip Ratio	2:1 Waste : Direct Shipping Ore (DSO) + Low Grade Ore (LGO)
Number of Open Pits	3 – 10
Depth of Open Pits	10m to 40m below surface
Crushing Rate	2 – 12 Mtpa
Product Quality	56 – 58 % Fe



Component	Overview
Product Logistics (land)	Road train on upgraded public roads to BLF
Product Logistics (marine)	Shallow draft (<4m) barges loaded from stockpiles at the BLF towed by shallow draft tugs to OGV loading point ± 40km offshore from Roper River mouth
Mine Area disturbance footprint	± 2,400 ha
BLF footprint	± 100 ha
Barge route seabed disturbance footprint	nil
OGV sea bed disturbance footprint	Single point mooring
Public road upgrade	± 160 km for Area C plus a further ± 75 km for Area X&W
Workforce Accommodation	Demountable buildings at mine area(s) and BLF
Workforce (construction)	200 – 400 direct, + indirect
Workforce (operations)	150 – 300 direct, + indirect

Each of these components, together with the proven mineral resources, are more fully described in the sections below.

4.2 Project footprint

The disturbance footprint for the project will involve the following components:

- Mining Areas
 - Internal access and haul roads
 - Pits
 - Topsoil stockpiles
 - Waste rock stockpiles
 - LGO stockpiles
 - DSO stockpiles
 - Product stockpiles (mine)
 - Crushing, screening and ore processing hardstands
 - Process reject storage facilities
 - Workshop, warehouse and vehicle parking hardstands
 - Office hardstands
 - Accommodation
- Water storage dams and pipelines¹
- Public road upgrades
- BLF
 - Berthing and loading facilities
 - Product stockpiles

¹ Requirements to be determined following further development of water sourcing strategy

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Dear Commissioner Mansfield

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RESPONSE TO SUBMISSIONS ON BEHALF OF THE CLAIMANTS:

MARIA ISLAND AND LIMMEN BIGHT RIVER LAND CLAIM (NO 71) AND PART OF THE MARIA ISLAND REGION LAND CLAIM (NO 198)

LOWER ROPER RIVER LAND CLAIM (NO 70)

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I Introduction

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Pursuant to your correspondence of 28 August 2018, please find below the following comments on behalf of Northern Territory Iron Ore Pty Ltd (NTIO) in regards to the Maria Island and Limmen Bight River land Claim (No 71) and part of the Maria Island Regional Land Claim (No 198). As the NLC submission on these Land Claims also applies to NTIO's correspondence regarding the Lower Roper River Land Claim No 70, this response applies equally to that Land Claim.

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Reference will also be made in this letter to the Mataranka Land Claim No 69 because of cumulative detriment issues raised in our correspondence to the Land Commissioner on behalf of NTIO on 4 July 2018. We will, however, also be provided separate correspondence specific to Land Claim No 69.

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II Tenure Issues

Contrary to NLC's belief at [31] of its submission, the passage in NTIO's earlier correspondence does not suggest an assumption that NTP 1184 includes the bank of the Roper River. It is merely a description of what is physically necessary to carry out the Roper Valley Iron Ore Project (**Project**) without reference to the underlying tenure.

NLC also posits a potential tenure issue at [32] of its submission regarding final disposition of a claim area in the Limmen Bight Land Claim Report (Report No 8). The Limmen Bight Land Claim Report is not the subject of this detriment review, however, and thus not a relevant consideration.

We note, however, that the Limmen Bight Land Claim Report contains a map

showing the boundary of the area claimed drawn to exclude the bank of the Roper River fronting NTP 1184. The boundary of the claim area is drawn to the border with NTP 1184 and then south and around NTP 1184. An enlarged copy of that map taken from the Limmen Bight Land Claim Report available at the Northern Territory Library is attached at **Annexure 1**.

III NLC's assertion that NTIO has provided insufficient information

NLC asserts at [37] that it has not been provided details of the proposed development of an ore loading facility and gave the specific example of possible dredging in the Roper River. We do not believe this statement is correct.

NTIO issued a Notice of Intent (NOI) for the Project in March 2017. The following is provided at page 23 of the NOI:

A preliminary water depth survey (Appendix C) indicates there is a minimum 3-4 metres water depth available between the proposed BLF and transshipment site. This depth will be navigable by the tugs and barges without any requirement for dredging.

The number of barge trips that will be required on a daily basis between the BLF and the offshore transshipment site will be variable and dependent on a range of factors, including the rate of production, the barge capacity, the number of barges in each string and the time it takes to tranship the product. Further feasibility studies will refine the detail in relation to this component of the project.

The NOI also included a Roper River Reconnaissance Depth Survey and provided the results of a search of the Aboriginal Sacred Sites Register, along with correspondence from the Aboriginal Areas Protection Authority.

Based on the NOI, the NT Environmental Protection Authority issued a Terms of Reference (**ToR**) and the Project is undergoing environmental impact assessment under both the *Environmental Assessment Act* (NT) and the *Environment Protection and Biodiversity Conservation Act 1999* (Cth). We have no reason to believe the NOI and associated appendices were not provided to the NLC during this process. The NOI and associated documents are also all publicly available on-line at <https://ntepa.nt.gov.au/environmental-assessments/register/roper-valley-iron-ore-project>.

In addition to the public availability of the above-mentioned documentation on the barge loading facility concept, we believe information has been transmitted directly to the NLC and relevant stakeholders. NTIO has engaged a consultant to commence preparation of the Economic and Social Impact Analysis element of the Environmental Impact Statement. NTIO is aware of meetings that have been held with NLC and remote community residents. An additional consultant, Dr Sarah Holcombe of the Centre for Aboriginal Economic Policy Research at ANU, has also been contracted to provide an overview of the traditional ownership structure in the project area. She, too, has begun engagement with NLC, the Aboriginal Areas Protection Authority, and others.

IV Agreement issues

NTIO categorically rejects any inference from the NLC submission that it has or would shirk its consultative obligations. NTIO has attempted to engage the Traditional Owners. NLC's

reluctance to facilitate that engagement, however, has increased the potential detriment to NTIO.

We first direct the Commissioner to the March 2017 NOI at p 9:

The Aboriginal Land Rights (Northern Territory) Act 1976 (ALRA) regulates exploration and mining on Aboriginal land and sets out the processes to be followed when negotiating with Traditional Owners for access to Aboriginal land and the grant of mineral titles over that land.

Native title rights exist over most of the project area and parts of the project area (EL24102) are on Aboriginal land. Prior to acquiring its tenements, NTIO undertook consultation with Native Title Claimants and Traditional Owners through the Northern Land Council (NLC). The NLC arranged meetings between NTIO representatives, Native Title Claimants and Traditional Owners in August 2016 at Minyerri and Mataranka. At those meetings, approval was sought and obtained to assign existing NLC native title and ALRA agreements from Sherwin Iron to NTIO.

Amongst the conclusions of the NOI at p 71 is:

NTIO is of the view that the project does have potential to cause significant impact to the environment for the following reasons...Potential impacts to stakeholders, including landowners and Traditional Owners, due to exclusion from the mining areas, increased road traffic and activity at Port Roper.

We further direct the Commissioner to ToR, also available on-line, for conduct of the environmental impact assessment, issues. The ToR, issued in November 2017, provides in part as requirements for assessment at pp 25-26:

Require submission of a draft Social Impact Management Plan which includes...

outlin[ing] a strategy for engaging with local Aboriginal communities to facilitate employment on the Project. This should include the delivery of training, the identification of suitable roles, and a discussion of how cultural values will be accommodated...

provid[ing] a stakeholder communications strategy including identification of, and ongoing consultation and negotiations with, all relevant stakeholders, ensuring the full range of community viewpoints are sought using culturally- and language appropriate methods...

NTIO has requested the NLC to assist and facilitate engagement with potentially impacted Aboriginal people. In an email from Bill Mackenzie, Director of NTIO, to Malcolm Hauser, Senior Project Officer at NLC, dated 4 April 2018, NTIO agreed to engage NLC to provide preliminary ethnographic research to support the community consultation meetings necessary to inform the draft Social Impact Management Plan referred to in the ToR.

However, in a subsequent email from Malcolm Hauser to Sarah Holcombe, NTIO's consultant anthropologist, dated 12 June 2018, the NLC advised there is little impetus for it to be involved until such time as the environmental approvals for the proposed project have been granted, the ToR notwithstanding.

We also refer to an email from Bill Mackenzie to Su Sze Ting, NLC Legal Practice Manager, dated 26 May 2017, stating that NTIO "would like to arrange a committee meeting (as required pursuant to Clause 5 of the Regional Deed) for later in the year to present these plans (this year's exploration plan and the longer term development plan set out in the notice of intent) and discuss issues arising with the TO's [Traditional Owners]. Please advise the best way to coordinate this meeting". NLC has not arranged the requested committee meeting.

NLC's reluctance to facilitate consultation at this time does not inspire confidence that the further agreements alluded to in [37] can be reached in a timely and cost-effective manner, increasing project risk and detriment to NTIO.

V Potential sea closure under the *Aboriginal Land Act* (NT)

At [7] of its submission, NLC asserts that the potential for sea closure adjacent to Aboriginal land is not relevant to this detriment review, and in doing so it cites [160] of the Limmen Bight Land Claim Report (Report No 8). NLC has, however, misread the paragraph and taken it out of context.

Paragraph [160] of the Limmen Bight Land Claim Report provides that an assertion of detriment is not relevant to the determination of the existence of the claim. In the following paragraph [161], however, Commissioner Toohey goes on state, "[a]t the same time the provisions of s.50(3) of the Act make detriment a relevant consideration."

We acknowledge that whether the seas could be closed under the *Aboriginal Land Act* (NT) is not relevant to the existence of the Land Claim itself. Nevertheless, if the Land Claim is granted the potential for closure of the seas adjacent to the Land Claim – even under different legislation and different considerations – is a detriment. It is a detriment because the potential for closure adjacent to the Land Claim area does not exist absent a grant of the Land Claim. This makes the potential for sea closure a relevant consideration under section 50(3) of the Act and under the Terms of Reference for the detriment review.

VI Mataranka Land Claim No 69

While the focus of this correspondence is to respond to NLC's submission with regard to NTIO in the Grouping 3 Land Claims, we must touch here on NLC's submission with regard to NTIO in the Mataranka Land Claim No 69, one of the Grouping 6 Land Claims. We do so because of the potential for cumulative detriment arise from the impact on the Project from multiple Land Claims. This potential cumulative detriment – unchallenged by NLC – is detailed in correspondence from Ward Keller on behalf of NTIO to the Land Commissioner with respect to the Mataranka Land Claim dated 4 July 2018.

We do not have the benefit of receipt of the NT Government's submission referred to in [36] of the NLC submission on the Mataranka Land Claim dated 17 August 2018. We appreciate, however, the Commissioner's acknowledgment of the uncertainty of the boundary and that the issue has been brought to the attention of the NT Government. We recognize the time constraints under which the Commissioner is operating, but we would respectfully resolution of the issue prior to or in the final detriment review.

NLC's submission, however, ignored the second issue raised by NTIO with regard to the Mataranka Land Claim, the potential limitation on the availability of construction materials for the road from borrow pits within NTP 2193. The issue of cumulative impacts to NTIO resulting from the Grouping 3 Land Claims and the Mataranka Land Claim thus remain.

Yours faithfully

WARD KELLER



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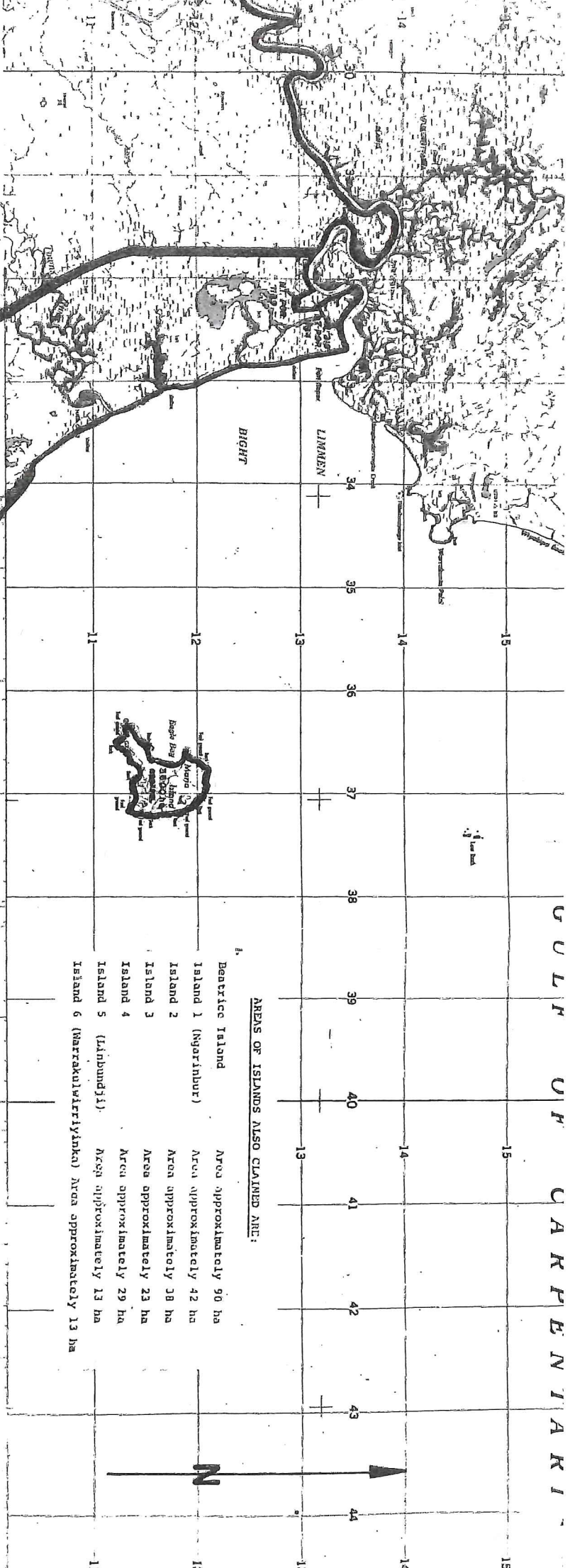
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Bill Mackenzie, Northern Territory
Iron Ore

Annexure 1



AREAS OF ISLANDS ALSO CLAIMED ARE:

- B. Beavrice Island Area approximately 90 ha
- Island 1 (Ngarihubur) Area approximately 42 ha
- Island 2 Area approximately 38 ha
- Island 3 Area approximately 23 ha
- Island 4 Area approximately 29 ha
- Island 5 (Lainbundji) Area approximately 13 ha
- Island 6 (Narakuwariyinka) Area approximately 13 ha

PL 700
ST. VIDGEON

PL 756
NATHAN RIVER

AREA CLAIMED

GULF OF CARPEN