To: **The Northern Water Project**

Environment Impact Statement

c/o 'Northern Water Project EIS Submission'

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Proponent: The SA State Labor Government, Department of Infrastructure and Transport (DIT)

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Title: "The EIS fails to assess the major opportunity costs in a *Captain's call* by the Premier for the public to pay for a $1 billion 400 km water supply pipeline for BHP and fails to assess the benefits to Mound Springs and Aboriginal cultural heritage by *replacing* BHP's Olympic Dam GAB Wellfields A and B ground water extractions."

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BHP granted mining rights to take water as Aboriginal groups input and concerns are ignored by the SA State Labor Government (David Noonan, Oct 2026)

Summary of public input on Northern Water EIS:

The EIS fails to assess or even explain the reported $5 billion publicly funded capital cost of the project. This serious flaw is contrary to Assessment Requirements to assess benefits & costs.

Q: Are SA Labor trying to avoid accountability for a massive off budget public funding liability, a stark spike in State debt & interest payments, and an arbitrary *Captain's call* by the Premier for a **$1 billion public funded subsidy to BHP** in a 400 km water supply pipeline to Olympic Dam?

The world's largest mining company BHP must be made to '*pay its own way*' in mining water supply, with half this new water supply reported to go north to BHP copper-uranium mining.

Premier Peter Malinauskas MP must realise he can't splash billions $'s of public funds on major new water supply infrastructure yet fail to take prompt measures to fully protect the Mound Springs of the GAB as little gems of our natural and Aboriginal cultural heritage. Key decisions on major public funding must pass political, economic & public interest tests. Failure to protect the Mound Springs will burn political capital and fails to pass the 'pub test'.

The Premier must direct or incentivise BHP to close Olympic Dam Wellfield A 'as soon as possible' and far in advance of provision of the serially delayed Northern Water supply.

The EIS must conduct an assessment to *maximise benefits* stated in the **Aims of the Project** regarding the Mound Springs and GAB waters - specifically to ***replace*** BHP Wellfield extractions.

The EIS unacceptably abrogates responsibility for the fate of the GAB Springs to that of BHP mining decisions. SA Labor must find the political will & leadership to tackle BHP vested interests and commit to replace BHP's Olympic Dam Wellfields extractions from the GAB.

The State must now act on belated recognition of long-standing high-level concerns for the survival of the Mound Springs of the GAB: "*that continued extraction from the GAB will result in a significant reduction to the 'vitality and the ecological viability of the springs', and that there is a high likelihood of extinction of more springs*." (A Way Forward: Final Report Oct 2021, p.124-125).

This EIS must now assess the "*ongoing environmental degradation*" to Mound Springs recognised in the project's own "Summary Business Case, Northern Water" (Feb 2024):

> "***Reliance on these unsustainable water sources will result in ongoing environmental degradation***. ... *These springs (Mound Springs) are of great significance to the Arabana people and they are an important part of their cultural heritage.*" (bold added)

The State and this EIS must now properly consider and adopt the clear public interest policy asks of the State peak environment body Conservation Council SA to protect the Mound Springs.

The fate of the Mound Springs must not be held over to a delayed 'first water' from 2032 on, nor await expiry of *untenable* 'mining rights' granted to BHP to take GAB Wellfield A waters till 2036.

This EIS must also consider the disrespectful process and shambles of existing arrangements in the amended Roxby Indenture Act 2026 over GAB waters and the fate of the Mound Springs:

> "***BHP granted mining rights to take water as Aboriginal groups input and concerns are ignored by the SA State Labor Government***" (Brief by David Noonan, Oct 2026)

The 'Response doc to the EIS' must assess this array of key public interest issues, or the project and its social license will be compromised. A further round of public consultation is required.

Northern Water's *social license* depends on protecting the Mound Springs:

Through the Northern Water Project the SA State Labor Government has again failed to commit to protect the unique and fragile Mound Springs of GAB - significant little gems of SA's natural and Aboriginal cultural heritage, in required 'as soon as possible' public interest closure of BHP Olympic Dam Wellfield A and Wellfield B ground water extractions from the GAB.

The Northern Water EIS Executive Summary sets laudable **Aims of the Project** (p.2) but fails to commit to them, or to quantify realisable benefits, or to set a timeline delivery on its Aims, to:

> • *increase environmental sustainability by reducing reliance on environmental water sources including the Great Artesian Basin, local water aquifers and the River Murray.*
>
> • *preserve culturally and economically significant water sources for First Nations communities in South Australia*.

The **Conclusion** of the Executive Summary (p.36) cites delivery of project benefits to the Upper Spencer Gulf and Far North regions of the state, including:

> • *Reduced reliance on existing water sources including the Great Artesian Basin, creating an opportunity to support the long-term protection of culturally significant water sources such as GAB mound springs and water pumped from the River Murray.*

At Ch.22 **Economic Environment** the EIS cites "*Quantifiable benefits*" in "*Reduced water extraction from the GAB*", but fails to even attempt to quantify the identified benefits, stating:

> "*Provision of water to BHP Olympic Dam from the Project provides an alternative water supply, creating an opportunity for a reduction in the volume of water extracted from the GAB and local groundwater sources by BHP. This will lead to a quantifiable environmental, cultural and social benefit for the South Australian community."*

Inexplicably, the 1,200 page Northern Water EIS fails to assess or even consider the potential to *maximise* deliverable public interest aims of the project across environmental, social and Aboriginal cultural benefits: in a warranted priority to protect the Mound Springs of the GAB; and in 'turning off the taps' of impactful water extraction from the GAB by BHP mining.

The State still fails to act on its recognition of long-standing high-level concerns (EIS p.2-19):

> "*There are concerns that continued extraction from the GAB will result in a significant reduction to the 'vitality and the ecological viability of the springs', and that there is a high likelihood of extinction of more springs*."
>
> (**A Way Forward: Final Report** into the destruction of Indigenous heritage sites at Juukan Gorge, Joint Standing Committee on Northern Australia, Oct 2021, p.124-125).

Specifically, the EIS unacceptably fails to assess "*Potential changes to GAB groundwater extraction and any resulting impacts or benefits to mound springs"* as direct outcomes of the project or even as cited indirect consequential outcomes of the project (EIS p.2-19).

The EIS recognises "*the potential for the Project to have environmental, cultural, and economic impact beyond the Project's construction footprint*" (EIS p.16-5) but fails to assess the impacts.

Conclusion: Failure to assess these public interest issues in the 'Response doc to the EIS' will *compromise* the Northern Water Project and set back its required *social license*.

The EIS seeks to abrogate responsibility for GAB Springs to BHP mining decisions:

The Northern Water EIS *defers* to BHP to make key decisions on its own impactful water use:

> "*Any future reduction in groundwater abstraction from the GAB would be determined through decisions made by individual water users and the operation of separate water allocation, licensing and regulatory policy and frameworks*." (EIS p.2-19)

This is despite the stark failure of '*separate water allocation, licensing and regulatory policy and frameworks*' in the recent *Roxby Downs (Indenture Ratification) Act 2026* to show respect or to pass basic tests on integrity in office & in public interest outcomes in legislative amendments.

I submit a Brief for consideration in this EIS process on the shambles of existing arrangements:

> "***BHP granted mining rights to take water as Aboriginal groups input & concerns are ignored by the SA State Labor Government***" (Oct 2026, attached p.12-13)

SA Labor has given precedence to BHP mining interests over Aboriginal interests in the draconian new Roxby Act to govern copper – gold - uranium mining at Olympic Dam for the next 50-years. The complex Bill was rushed through Parliament after a *farcical* 6-working day 'consultation' and a Select Committee disinterested in public input.

In a travesty of mining interests over integrity, requests by Aboriginal Native Title groups to be heard in public Hearings were *denied* and their public input on a Roxby Bill was ignored.

The new mining laws in SA *unacceptably* favour BHP vested interests over Aboriginal cultural heritage protection, with 'rights' to operate Wellfield A out to 2036 and *untenable* options for BHP to extract fossil GAB waters from the far larger scale Wellfield B for decades to come.

Recent public input by the Arabana Aboriginal Corporation to the State Government said:

"The Arabana native title determination area includes Wellfield A in its entirety and part of Wellfield B, from which water has been taken for Olympic Dam mine for the past forty years.

That water sustains the Kutha ngarrawa, the mound springs, that depend on the Great Artesian Basin and are very culturally significant to Arabana People. The extraction of water for Olympic Dam mine has had a devastating and irreversible impact on our land and caused damage to and loss of our Kutha ngarrawa. ...

The bill therefore bears directly on the water, the Heritage and the Country of the Arabana People. The springs are places of great spiritual, cultural and environmental significance. They carry our Ularaka, the stories of the Arabana People. ...

As the AAC said in its submission of 28 March 2021 to this Parliament, the mound springs are disappearing before the Arabana People's eyes, the Arabana People are losing their stories and their heritage as surely as if they were had been blown up with dynamite. ...

The Bill permits BHP to continue to use Wellfield A until 8 May 2036, with the possibility of extension under clause 53. The AAC is extremely concerned by both features. ... The impact on our springs is already severe, and we call for the immediate closure of Wellfield A.

... Continued drawdown from Wellfield B is reducing pressure in the Great Artesian Basin with detrimental consequences for the land, our springs, for delicate ecosystems including endemic

invertebrates and fish species found only in those springs, and for places of profound cultural significance to the Arabana People."

Recent public input by the Dieri Aboriginal Corporation to the State Government said:

"*BHP's Wellfield B is on Dieri country. As Dieri people we are very concerned about the water that is being abstracted from our country and its impact on the pressure of the Great Artesian Basin. Water is very important to us as Dieri People and the impact of the water taken from Wellfield B impacts the health of our Country.*

We have a deep spiritual connection to our land and are responsible for protecting it.

On behalf of the Dieri people, we call on the Parliament to require BHP to cease taking water from Wellfield A & B and from the Great Artesian Basin as soon as possible and not allow BHP to expand or take further water from the Basin in the future."

SA Labor must find the political will & leadership to tackle BHP vested interests:

Over four years ago then State Labor Deputy Leader & Minister for Environment and Water the **Hon Susan Close MP** did show the required leadership to ***replace*** BHP's GAB Wellfields:

> *"I agree with you that the real opportunity to achieve significant beneficial environmental and cultural outcomes is to replace, or at least significantly reduce, Olympic Dam's current extractions from the GAB with a new, sustainable water supply. ...*
>
> *Subject to the outcome of the required assessments, it is my view that this project represents the most effective approach to achieving the environmental outcomes that we both desire."* (Letter to David Noonan, Ref: CEW22/00053, 18 July 2022)

Protection for the Mound Springs of the GAB is an important public interest issue, see:

- Concerns new BHP agreement 'locks in' basin water extraction ABC Ch.2 News Interviews David Noonan and Minister Tom Koutsantonis 15 June 2026;
- Outrage as days given to comment on new BHP deal with govt InDaily 15 June 2026;
- Traditional Owners concerned as new BHP deal at Olympic Dam looms NIT 16 June;
- Controversial deal with mining giant approved as copper exports boom InDaily 17 June;
- Future certain for Olympic Dam but not Traditional Owners NIT 17 June 2026;
- Calls to end water extraction from Great Artesian Basin before culturally significant springs are lost - ABC News Interviews, the Arabana Aboriginal Corporation Head Ranger and Environmentalist David Noonan on ABC Ch.2 News 24th Nov;
- Water is under pressure in the Great Artesian Basin - ABC News Interviews with Arabana Elders in an ABC Ch.2 News Feature Sun 23rd Nov 2025.

Recommendation: SA Labor and this EIS must commit to deliver on the lead public interest priority for Northern Water to *replace* BHP Olympic Dam water extractions from the GAB.

CCSA: Roxby Act rides roughshod over environmental and Indigenous concerns

SA mining laws favour BHP over environmental and Aboriginal concerns on water. Conservation Council SA expressed deep concern at the *Roxby Downs (Indenture Ratification) (Amendment of Indenture) Amendment Bill 2026* ('Roxby Bill') put before the SA Parliament in mid-2026 in a fast-track approval process. The State peak environment body stated:

> ***"Roxby Bill rides roughshod over environmental and Indigenous concerns**:*
>
> *If passed, the Bill has a potential to irreversibly damage or destroy the Mound Springs of the Great Artesian Basin (GAB). These unique springs are in the far north of our state and are a South Australia environmental and cultural treasure.*
>
> *Conservation SA has long called for the Mound Springs of the GAB to be permanently protected for the local Indigenous and South Australian communities.*
>
> *In Dec 2025, Conservation Council SA CEO Kirsty Bevan wrote to the SA Premier seeking the long-term protection of the Mound Springs (extract below):*
>
> ***Protect the Mound Springs and End Unsustainable Water Extraction from the Great Artesian Basin:***
>
> *Mound Springs are globally significant cultural, ecological and geological features, and are a listed EPBC Act "Endangered Ecological Community". These unique and fragile little gems support rare species, deep cultural heritage and landscapes central to the identity of Traditional Owners. Community concern has escalated regarding BHP's use of Great Artesian Basin water for mining and the cumulative impact on Springs.*
>
> ***We call for:***
>
> 1. *Recognition of the Mound Springs of the GAB as a high-value ecosystem requiring elevated protection.*
> 2. *Closure as soon as possible of BHP Wellfield A water extraction operations that have directly impacted the Springs.*
> 3. *Transition of industrial scale BHP Wellfield B water extraction operations toward alternative water sources, such as desalination or recycled water, to protect the Basin.*
> 4. *Transparent timely reporting of extraction volumes, groundwater pressures and spring health and monitoring information.*
> 5. *Co-governance with Traditional Owners, with investment in cultural heritage protection and Indigenous Rangers on country.*
>
> ***Outcome Sought:***
>
> *Long-term water security for communities, ecosystems of Great Artesian Basin—and a clear safeguard against irreversible damage."*

Recommendation: The State Government and this Northern Water Project EIS process must now properly consider and adopt the clear public interest policy asks of the State peak body Conservation Council SA, as set out in "***Roxby Bill rides roughshod over environmental and Indigenous concerns***" at: https://www.conservationsa.org.au/protect_mound_springs

Northern Water has at least set out that the *fate* of the Mound Springs is at stake:

In my experience in having been a Conservation SA representative on the Northern Water "**Stakeholder Reference Group**" from back in 2022 to early 2026, the Northern Water Project teams have had the professionalism & good will to recognise and set out what is at stake.

For instance, the "Summary Business Case, Northern Water" (Feb 2024) recognised "***ongoing environmental degradation***" to the GAB groundwater resources and to the unique Springs:

> ***2.2.1 ENVIRONMENTAL*** *Currently, mining and other industry in the region are reliant upon extracting water from the River Murray, Great Artesian Basin and other deep saline groundwater resources. SA Water supplies to the region are also heavily reliant on the River Murray. Reliance on these unsustainable water sources will result in ongoing environmental degradation. ...*
>
> *The NW will provide a sustainable source of water and reduce the need for supplies to be taken from either the Great Artesian Basin or the River Murray. ...*
>
> ***2.2.2 CULTURAL*** *The 2021 Juukan Gorge Inquiry made the following observations:*
>
> *"These springs (Mound Springs) are of great significance to the Arabana people and they are an important part of their cultural heritage.*
>
> *There are fears that continued extraction from the Great Artesian Basin will result in a significant reduction to the 'vitality and the ecological viability of the springs', and that there is a high likelihood that more springs will go extinct."*
>
> *The NW will play a significant role in reducing reliance on the use of water supplies that hold significant cultural importance to Traditional Owners. Providing the opportunity for reduced water withdrawals from the Great Artesian Basin may play a role in preserving mound springs. As virtual oases in the desert, the springs were, and still are, of vital importance to Indigenous people.*

At **Preservation of culturally and economically significant water sources** (p.2-5) the EIS says:

> ***"****The Far North region encompasses valuable natural and cultural assets, but licenced water extraction has seen reduction in artesian water pressure and changing water flows, which has the potential to impact on areas of Aboriginal cultural significance.*
>
> *For the Arabana people, the GAB mound springs form a key feature in creation and cultural stories and a vital part of their continuing association with the land.*
>
> *The permanent GAB mound springs, watercourses and arid wetlands created by the GAB provide food and means of passage across some of the world's most arid landscapes. As virtual oases in the desert, the springs are of vital importance to Aboriginal people.*
>
> *... The Project has the potential to contribute to the preservation of the mound springs, the GAB and other groundwater resources by providing a new water supply."*

Recommendation: SA Labor must now show the political leadership to recognise and protect what is at stake and this EIS deliver on Northern Water by *maximising benefits* to Mound Springs in *replacing* BHP's GAB Wellfields A and B ground water extractions.

The Premier can't splash billions $'s on water supply yet fail to protect Springs:

Premier Peter Malinauskas MP must realise he can't splash $5 billion of public funds on major new water supply infrastructure yet fail to take prompt measures to fully protect the Mound Springs of the GAB as little gems of our natural and Aboriginal cultural heritage.

Key decisions on public funding must pass political, economic and public interest tests. Continued failure to protect Mound Springs will burn political capital & fail to pass the 'pub test'.

The Premier must direct or incentivise BHP to close Olympic Dam GAB Wellfield A 'as soon as possible' and far in advance of provision of the serially delayed Northern Water supply.

BHP "Shared water challenges" Target Milestones had committed to close Wellfield A by 2030:

> *FY2030 – cease abstraction from Wellfield A through switching to coastal desalination supply in partnership with the SA Government on the Northern Water Supply Project*

The fate of the Mound Springs must not be held over to a delayed 'first water' from 2032 on, nor await expiry of *untenable* 'mining rights' granted to BHP to take GAB Wellfield A waters till 2036.

It is now on the **Premier** to *commit* to replace the far larger scale BHP Olympic Dam GAB Wellfield B water extraction, a long-term threat to the Springs, with Northern Water supply.

BHP must pay for the new $1 billion 400 km Olympic Dam water supply pipeline:

The EIS fails to assess or even explain the reported $5 billion publicly funded capital cost of the project. This serious flaw is contrary to Assessment Requirements to assess benefits & costs.

Q: Are SA Labor trying to avoid accountability for this massive off budget public funding liability, a stark spike in State debt and interest payments, by leaving it out of the EIS?

This EIS unacceptably fails to inform the public of the costs of the project, costs that are far in-excess-of the $ cost of the new Children's Hospital. The EIS Executive Summary makes only a simplistic reference to "*the initial investment in the project*" (p.37).

The EIS Ch.2 Justification and Alternatives (p.2-15) and the inaptly named 'Summary of Key Northern Water Project Costs and Benefits', fails to cite, explain or assess the project $ costs.

2.5.1 *Key economic costs and benefits* (p.2-16) only refer to benefits! One is directed to Ch.22 Economic Environment, for "*further detail of the economic benefits and potential impacts of the Project*", that again fails to cite, explain or assess the project's $ costs and opportunity costs.

The EIS fails to even cite the capital costs for the 400 km water supply pipeline to BHP mining.

The arbitrary *Captain's call* by the Premier to make the public subsidise the full cost of BHP's 400 km water supply pipeline carries an *unacceptable* $1 billion opportunity cost in an array of foregone alternative public investments.

The world's largest mining company BHP must be made to '*pay its own way*' in mining water supply, with half this new water supply reported to go north to BHP copper-uranium mining.

Such important public interest matters must not be left out of the EIS and require consultation.

Recommendations:

1. The State Government must commit to protect the unique and fragile Mound Springs of GAB, key little gems of SA's natural and Aboriginal cultural heritage, in required 'as soon as possible' public interest closure of BHP Olympic Dam GAB Wellfields A & B ground water extraction.

2. The **Premier** must realise he can't splash up to $5 billion of public funds on water supply infrastructure yet fail to take prompt measures to fully protect the Mound Springs of the GAB.

- The Premier must direct or incentivise BHP to close Olympic Dam GAB Wellfield A 'as soon as possible' and far ahead of provision of the delayed Northern Water supply;
- The fate of the Mound Springs must not be 'held over' till provision of 'first water' from 2032 on, nor await expiry of *untenable* 'mining rights' granted to BHP to take fossil GAB waters at Wellfield A till 2036 (noting BHP had agreed to close Wellfield A by 2030);
- It is now on the Premier to *commit* to **replace** the far larger scale BHP Olympic Dam GAB Wellfield B, a long-term threat to the Springs, with Northern Water supply.

3. The EIS must conduct an assessment on two key public interest **Aims of the Project** (set out in the EIS Executive Summary at p.2) and assess how to *maximise* the key "*benefits*" of the project identified in the **Conclusion to the Executive Summary** (at p.36):

> • *increase environmental sustainability by reducing reliance on environmental water sources including the Great Artesian Basin, local water aquifers and the River Murray*.
>
> • *preserve culturally and economically significant water sources for First Nations communities in South Australia*. (p.2)
>
> • *Reduced reliance on existing water sources including the Great Artesian Basin, creating an opportunity to support the long-term protection of culturally significant water sources such as GAB mound springs and water pumped from the River Murray*. (p.36)

4. The EIS must carry out a quantified assessment of the "*environmental, cultural and social benefit for the SA community",* identified in EIS Ch.22 Economic Environment, Table 22-9: *"Summary of quantifiable benefits"* titled "*Reduced water extraction from the GAB"* (p.22-24):

> "*Provision of water to BHP Olympic Dam from the Project provides an alternative water supply, creating an opportunity for a reduction in the volume of water extracted from the GAB and local groundwater sources by BHP. This will lead to a quantifiable environmental, cultural and social benefit for the South Australian community."*

5. The EIS must assess the recognised *"potential for the Project to have environmental, cultural, and economic impact beyond the Project's construction footprint"* (EIS p.16-5) regarding key identified consequential impacts of the project, in:

> "*Potential changes to GAB groundwater extraction and any resulting impacts or benefits to mound springs."* (EIS Reduced reliance on existing water sources p.2-19)

6. The State Government and this EIS process must recognise that *failure* to assess these important public interest issues in the "Response document to the EIS" will *compromise* the Northern Water Project and *result* in a set back to its *social license*.

7. The State Government and this EIS process must stop seeking to abrogate responsibility for protection of the Mound Springs, in *deferring* to BHP vested interest decisions on its own impactful water use for Olympic Dam mining in GAB Wellfield A & B ground water extractions:

> "*Any future reduction in groundwater abstraction from the GAB would be determined through decisions made by individual water users and the operation of separate water allocation, licensing and regulatory policy and frameworks*." (EIS p.2-19)

8. The EIS process must consider the record of relevant disrespectful and shambolic recent State Government process on a Roxby Bill, as conveyed in a 2-page Brief (attached):

> "***BHP granted mining rights to take water as Aboriginal groups input and concerns are ignored by the SA State Labor Government***" (David Noonan, Oct 2026)

The *Roxby Downs (Indenture Ratification) Act 2026* imposes uncertainty and long-term consequences for ground water dependent little gems of Australia's natural heritage: the unique and fragile Mound Springs, a Federal EPBC Act listed "**Endangered Ecological Community**". This may make Northern Water *incompatible* with Federal co-funding responsibilities.

9. SA Labor must now find the political will & leadership to tackle BHP vested interests and to commit to **replace** Olympic Dam's current extractions from the GAB with a new, sustainable water supply, as set out over four years ago under the leadership of then State Labor Deputy Leader and Minister for Environment and Water the **Hon Susan Close MP**:

> *"I agree with you that the real opportunity to achieve significant beneficial environmental and cultural outcomes is to replace, or at least significantly reduce, Olympic Dam's current extractions from the GAB with a new, sustainable water supply. ...*
>
> *Subject to the outcome of the required assessments, it is my view that this project represents the most effective approach to achieving the environmental outcomes that we both desire*." (Letter to David Noonan, Ref: CEW22/00053, 18 July 2022)

10. The EIS must now comprehensively assess and deliver on the lead public interest priority for Northern Water to **replace** BHP Olympic Dam Wellfields water extraction from the GAB.

11. The State of SA and this EIS process must now properly consider and adopt the clear public interest policy asks of the State peak environment body **Conservation Council SA**, to provide long-term protection for the Mound Springs as "*a clear safeguard against irreversible damage"*, as set out in "*Roxby Bill rides roughshod over environmental and Indigenous concerns*".

12. The State must now commensurately act on belated recognition of long-standing high-level concerns for the survival of the Mound Springs of the GAB (cited at EIS p.2-19), by committing to *maximise benefits* to Mound Springs in *replacing* BHP's Wellfield extractions:

> "*There are concerns that continued extraction from the GAB will result in a significant reduction to the 'vitality and the ecological viability of the springs', and that there is a high likelihood of extinction of more springs*."
>
> (A Way Forward: Final Report into the destruction of Indigenous heritage sites at Juukan Gorge, Joint Standing Committee on Northern Australia, Oct 2021, see: "**Box 5.3 Case study: The sacred mound springs of the Arabana people** p.124-125)

13. The State must now act on, and the EIS must specifically assess, the recognised "***ongoing environmental degradation***" to GAB groundwater resources and to the Mound Springs, as set out in this Project's own "Summary Business Case, Northern Water" (Feb 2024):

> *2.2.1 ENVIRONMENTAL Currently, mining and other industry in the region are reliant upon extracting water from the River Murray, Great Artesian Basin and other deep saline groundwater resources. … Reliance on these unsustainable water sources will result in ongoing environmental degradation. …*

14. The 'Response doc to the EIS' must assess the $5 billion public funded capital costs of the project, and comply with Assessment Requirements to assess *both* benefits & costs.

In a breach of basic EIA practice, this EIS has failed to inform the public of the core $ costs of the project, major public funding costs far in-excess-of the $ cost of a new Children's Hospital.

The 'Response doc to the EIS' must set out and assess public funding and economic and financial costs including the effect on State debt & interest payments; and set out the capital costs of the project for both the desalination facility and the 400 km water supply pipeline.

The EIS must be made compliant with Assessment Requirements to assess *both* benefits & costs; to provide "*Expected local, regional and State benefits and costs"* including in "*monetary costs terms"*; and to "*Provide a full economic analysis of the development including … cost-benefit (risk return) analysis (CBA)"* – a CBA that sets out the actual costs of the project!

15. The 'Response doc to the EIS' must assess *both* direct costs & opportunity costs in public funding of a $1 billion 400km water supply pipeline to BHP Olympic Dam mining.

The EIS must be made to assess ***opportunity costs*** across an array of foregone public interest funding investments in the Premier's call to publicly fund a $1 billion 400 km water supply pipeline, that is intended to deliver approx. half of the Northern Water supply to BHP mining.

As the world's largest mining company, BHP must be made to '*pay its own way'* in core water supply infrastructure for Olympic Dam copper-uranium mining and intended expansions.

It is unacceptable for the State Labor Government to try to avoid accountability for the Premier's call to require a $1 billion public funded subsidy to BHP's Olympic Dam mining.

Such key public interest matters must not be left out of the EIS and do require consultation.

16. The State Government must provide a further round of public consultation on the Northern Water Project, following issue of a "Response doc to the EIS', to address an array of key public interest matters the EIS has failed to assess and failed to inform and consult the public on.

BHP granted mining rights to take water as Aboriginal groups input and concerns are ignored by the SA State Labor Government:

Brief by David Noonan B.Sc., M.Env.St., Independent Environment Campaigner (Oct 2026)

SA Labor gave precedence to BHP mining interests over Aboriginal interests in a draconian new ***Roxby Downs (Indenture Ratification) Act*** to govern copper - uranium mining at Olympic Dam for the next 50-yrs. The complex Bill was rushed through a farcical 6-working day 'consultation'.

In a travesty of mining interests over integrity, requests by affected Aboriginal Native Title groups to be heard in public Hearings were *denied* and their strong public input on the Bill was *ignored*.

The ABC "**Concerns new BHP agreement 'locks in' basin water extraction**" (15 June) reported the **Minister for Mining Tom Koutsantonis MP** said public input to the "Roxby Downs Select Committee" was considered but not included in the Final Report, as "*they weren't relevant*":

> *"The concerns that they were making, for example, about native title and agreements for Indigenous groups, weren't part of the indenture. Native title is assigned by the Commonwealth parliament, not by the state parliament*."

The **Kokatha Aboriginal Corporation public input to the Committee** (Submission No.19**)** said:

"*The proposed amendments to the Indenture have caused us great concern as it reminds us of the damage allowed in the first Indenture and the way we were treated in the two subsequent negotiations.*

"We had been led to believe by BHP that we would have the opportunity to be consulted on this Indenture Act and consequently we were bitterly disappointed when we were given very short notice of its planned introduction to Parliament and no engagement from the Government. ...

"Both the ILUA and the Olympic Dam Agreement significantly disadvantage the Kokatha people and advantage the State and BHP. This Bill could have been used to balance this disadvantage but instead it has been used to entrench the disadvantage. ... The failure to address this issue is a serious flaw in the Bill and out of step with the expectations of the Australian community."

The SA State Labor Government has failed a key test on integrity in public office. Traditional owners have a fundamental right to be heard and to provide evidence on matters affecting their rights, interests, country and culture - this is ***absolutely relevant*** in a democratic state.

SA Labor decided to effectively ignore an array of critical public input and failed to respect Native Title groups rights & interest in favour of BHP copper – uranium mining vested interests.

Even a claimed 'benefit' in bringing BHP mining at Olympic Dam under the *Aboriginal Heritage Act 1988* was compromised by imposing a seven-year 'Transition period' to suit BHP. The A-G and **Minister for Aboriginal Affairs Kyam Maher MLC** explained this was because: "*BHP have existing arrangements*". BHP vested interests rank above Aboriginal Heritage protection in SA!

As Treasurer, Tom Koutsantonis MP has finally put monies in the SA Budget for '**Truth-Telling'**, this draconian Roxby Downs Indenture Act 2026 means there is a lot more truth to tell...

The new Roxby Downs Indenture Act locks in long term adverse consequences for ground water dependent little gems of Australia's natural heritage: the unique and fragile Mound Springs of the Great Artesian Basin, a Federal EPBC Act listed "Endangered Ecological Community".

The **Arabana Aboriginal Corporation public input to the Committee** (AAC, Sub No.18) said:

"*Although the Olympic Dam mine lies on Kokatha country, it draws its water from Arabana Country. The Arabana native title determination area includes Wellfield A in its entirety and part of Wellfield B, from which water has been taken for Olympic Dam mine for the past forty years.*

"That water sustains the Kutha ngarrawa, the mound springs, that depend on the Great Artesian Basin and are very culturally significant to Arabana People. The extraction of water for Olympic Dam mine has had a devastating and irreversible impact on our land and caused damage to and loss of our Kutha ngarrawa. ... The bill therefore bears directly on the water, the Heritage and the Country of the Arabana People.

"The springs are places of great spiritual, cultural and environmental significance. They carry our Ularaka, the stories of the Arabana People. ... As the AAC said in its submission of 28 March 2021 to this Parliament, the mound springs are disappearing before the Arabana People's eyes, the Arabana People are losing their stories and their heritage as surely as if they were had been blown up with dynamite. ...

"The Bill permits BHP to continue to use Wellfield A until 8 May 2036, with the possibility of extension under clause 53. The AAC is extremely concerned by both features. ... The impact on our springs is already severe, and we call for the immediate closure of Wellfield A. ...

"Continued drawdown from Wellfield B is reducing pressure in the Great Artesian Basin with detrimental consequences for the land, our springs, for delicate ecosystems including endemic invertebrates and fish species found only in those springs, and for places of profound cultural significance to the Arabana People."

The **Dieri Aboriginal Corporation public input to the Committee** (Submission No.21) said:

"*BHP's Wellfield B is on Dieri country. As Dieri people we are very concerned about the water that is being abstracted from our country and its impact on the pressure of the Great Artesian Basin. Water is very important to us as Dieri People and the impact of the water taken from Wellfield B impacts the health of our Country. We have a deep spiritual connection to our land and are responsible for protecting it.*

"On behalf of the Dieri people, we call on the Parliament to require BHP to cease taking water from Wellfield A & B and from the Great Artesian Basin as soon as possible and not allow BHP to expand or take further water from the Basin in the future."

In contrast: new SA mining laws favour BHP with 'rights' to operate Wellfield A to 2036 and options to continue to extract fossil GAB waters from the far larger scale Wellfield B for decades.

It is now over to the public to realise protection for the unique and fragile Mound Springs and to respect the Aboriginal Native Title rights and interests at stake in BHP copper – uranium mining.

For further info: see "Friends of Mound Springs (FOMS) | Far North of SA" webpage https://www.friendsofmoundsprings.org.au/

see "***Roxby Bill rides roughshod over environmental and Indigenous concerns***" by Conservation SA https://www.conservationsa.org.au/protect_mound_springs

see FOE on BHP copper-uranium mining, at: https://nuclear.foe.org.au/olympic-dam/

with an 8-page "Summary of BHP's new Roxby Indenture Act" (David Noonan 28 June)