

12 August 2026

To: Department for Infrastructure and Transport and Department for Energy and Mining

Re: Northern Water Project – Environmental Impact Assessment

Introduction

AMEC welcomes the opportunity to provide feedback to the Department for Infrastructure and Transport on the Northern Water Project Environmental Impact Statement (EIS). As the Department for Energy and Mining is separately progressing the project's business case, and given our recommendations include involvement of the Geological Survey in the EIS process, we have provided this submission to both departments.

About AMEC

The Association of Mining and Exploration Companies (AMEC) is a national industry association representing over 550 member companies across Australia. AMEC's member companies account for over \$100 billion of the mineral exploration and mining sector's capital value. Our members are mineral explorers, emerging miners, producers, and a wide range of businesses working in and for the industry.

AMEC's membership base in South Australia comprises 45 exploration and mining companies, including companies undertaking pilot trials, mine development and mining operations. A further 45 AMEC member companies are local suppliers and service providers supporting industry to deliver projects.

General Comments

AMEC represents mineral exploration and mining companies operating throughout South Australia, including companies with mineral exploration licences, mining interests and future development opportunities in areas potentially affected by the Northern Water Project.

AMEC recognises the strategic importance of securing sustainable long-term water supplies for northern South Australia and supports investment in infrastructure that contributes to the State's economic development and the long-term sustainability of the resources sector.

The Northern Water Project may create opportunities for future mining developments by providing access to a more reliable and sustainable water source, supporting regional development and reducing reliance on groundwater resources. However, these benefits may not be shared equally across the sector. While larger mining companies may be well placed to utilise desalinated water infrastructure, smaller explorers and emerging mine developers may face challenges accessing water on commercially viable terms.

The project is proposed within one of South Australia's most prospective mineral regions and may directly affect existing mineral tenements through the location of the desalination plant,

pipeline corridor, easements and associated infrastructure. Eight companies may be directly affected and some of these could face material economic impacts. AMEC therefore supports the project in principle but seeks to ensure its impacts on existing and future mineral exploration and mining activities are appropriately assessed and managed.

AMEC is concerned that engagement with affected explorers and developers has been limited and inconsistent to date. The current survey process does not provide sufficient opportunity to understand the potential impacts on exploration programs, future discoveries, mining projects and investment decisions.

Accordingly, the EIS should comprehensively assess the economic, environmental, social, cultural heritage and land access impacts of the project, including cumulative impacts arising from existing obligations on explorers and miners such as environmental approvals, native title negotiations, cultural heritage processes and pastoral land access arrangements. Attention should be given to ensuring the project does not create unnecessary delays, access constraints or unintended impacts on future resource development opportunities.

Recommendations

1. Undertake targeted consultation with all affected exploration and mining companies
2. Include a dedicated mining and exploration economic impact assessment
3. Work with Industry and the Geological Survey to assess and minimise mineral sterilisation risks and support access to existing projects
4. Clarify the interaction between Northern Water Project tenure powers and mining tenure applications
5. Assess future mining industry access to Northern Water infrastructure
6. Update South Australia's Multiple Land Use Framework
7. Ensure environmental assessment standards are considered consistently across industries
8. Assess cumulative impacts on traditional owners, pastoralists and communities
9. Assess native title and cultural heritage capacity constraints

Recommendations in Detail

1. Undertake targeted consultation with all affected exploration and mining companies

AMEC is concerned that engagement with affected explorers and miners has been limited and inconsistent to date. The current EIS Survey consultation process does not provide sufficient opportunity to fully identify, understand and address the potential impacts on exploration programs, mining operations, future discoveries, mining lease applications or investment decisions.

The South Australian Government should undertake direct and ongoing consultation with all affected exploration and mining tenement holders prior to finalisation of the EIS. Every tenement holder will have different operational, geological, environmental and land access considerations. Meaningful consultation will ensure project-specific impacts are identified, alternative design options are considered, and practical mitigation measures can be developed before infrastructure locations are finalised.

AMEC recommends:

- Direct company engagement
- Regular industry briefings including with AMEC
- Early notification of project changes
- Publication of key decisions
- Ongoing engagement throughout construction and operation
- Consultation regarding heritage and native title capacity impacts

AMEC would be pleased to facilitate a DIT consultation forum with member companies that hold exploration and other mining licences in the Northern Water Project area. Better industry engagement will help identify project-specific impacts and support informed decision-making on corridor and infrastructure locations. It will also assist in developing practical mitigation measures that minimise future conflicts and improve project design.

2. Include a dedicated mining and exploration economic impact assessment

The EIS should contain a specific assessment of impacts on mineral exploration and mining activities. AMEC recommends that DIT engage with Industry to fully understand their forward work programs and plans for development. The EIS should recognise not only existing operations but also the value of future mineral resources not yet discovered or developed.

The assessment should consider:

- Delays to exploration programs
- Increased costs of accessing projects
- Reduced exploration expenditure
- Implications for future discoveries.
- Impacts on mining lease applications
- Restrictions on future resource development
- Potential loss of investment

3. Work with Industry and the Geological Survey to assess and minimise mineral sterilisation risks and support access to existing projects

The Northern Water Project is proposed within one of South Australia's most prospective mineral regions and intersects areas where exploration and mining activity is ongoing and expected to expand in coming decades. The project has the potential to directly affect existing mineral tenements and future development opportunities through the location of the proposed desalination plant, pipeline corridor, easements and associated infrastructure.

The South Australian Resources Information Gateway (SARIG) shows that there are currently eight companies holding various mineral and mining exploration licences, that may be directly affected by the current project footprint, with some potentially facing material economic impacts – see Attachment 1.

The EIS should include a detailed assessment of the extent to which the Northern Water Project may sterilise access to mineral resources. Permanent infrastructure, easements and exclusion zones may limit or prevent access during construction and into the future for mineral exploration, development and mining.

Protecting future access to prospective ground is essential to maintaining South Australia's exploration pipeline. The assessment should identify areas of known mineral prospectivity, potential exploration targets, opportunities to modify infrastructure alignments and measures to preserve future access to mineral resources.

AMEC recommends the Geological Survey of South Australia undertake a review of geological, geophysical, geochemistry, drilling data and other mineral economic information covering areas affected by the project.

The review should:

- Assess mineral prospectivity
- Identify potential future discoveries
- Evaluate sterilisation risks
- Inform infrastructure location decisions
- Support long-term resource development opportunities

4. Clarify the interaction between Northern Water Project tenure powers and mining tenure applications

The EIS should assess and clearly identify potential impacts of the Northern Water Project on existing and future mining tenure applications, including Mining Lease Applications (MLAs). This should include consideration of how land acquisition and project entitlement powers proposed under the *Northern Water Project (Land and Infrastructure) Bill 2026* may interact with mining tenure processes.

AMEC is concerned that where Northern Water powers are exercised over land subject to a pending MLA, there may be unintended consequences for mining proponents. Given that MLAs can take one to two years or longer to progress through assessment and approval

processes, proponents require certainty that the subsequent acquisition of land or establishment of a project entitlement will not unnecessarily compromise, delay or invalidate an application.

Currently, amendments to the area of an MLA are generally not permitted once an application has been lodged. Accordingly, the exercise of Northern Water powers over part of an application area could potentially require a proponent to recommence the application process or otherwise jeopardise the timely development of a mining project. Such outcomes could result in significant costs, delays and investment uncertainty.

AMEC recommends that the South Australian Government use the *Northern Water Project (Land and Infrastructure) Bill 2026* to clarify the interaction between project entitlement powers and existing mining tenure processes. This includes providing mechanisms to ensure proponents are not unfairly disadvantaged where Northern Water infrastructure intersects with pending MLAs. Early legislative clarification would improve regulatory certainty, support investment confidence and facilitate the coexistence of major infrastructure and future resource development.

5. Assess future mining industry access to Northern Water infrastructure

The EIS should consider how future mining projects may access water supplied through the Northern Water infrastructure. While the project may create significant opportunities for future resource developments, the benefits will depend on practical and economic access to the infrastructure. The assessment should consider likely future mining demand for water, access arrangements, connection costs and water pricing.

The commercial framework suitable for large established operators may not be viable for smaller mining projects. Consideration should be given to junior explorers, emerging mine developers, smaller producers and other future regional development opportunities.

AMEC supports efforts to establish sustainable water supplies for industry but notes that the commercial arrangements suitable for major resource operators may not necessarily be suitable for smaller companies seeking to develop new mining operations.

6. Update South Australia's Multiple Land Use Framework

AMEC recommends the South Australian Government use the Northern Water Project as a catalyst to update the State's 2016 Multiple Land Use Framework.

The Project highlights the need to balance multiple land-use interests, including:

- mining and mineral exploration
- major infrastructure projects
- renewable energy developments
- biodiversity and nature repair projects
- pastoral activities
- cultural heritage obligations.

A modernised framework should establish clear coexistence principles, consultation expectations, dispute resolution pathways and compensation principles where coexistence is not possible. The framework should provide greater certainty for industry, landholders, traditional owners and project proponents while helping to avoid unnecessary sterilisation of mineral resources.

7. Ensure environmental assessment standards are considered consistently across industries

The EIS should consider environmental management requirements already applying to exploration and mining projects in the region. Mineral explorers and miners are required to prepare Programs for Environmental Protection and Rehabilitation (PEPRs), mining lease proposals and environmental management plans. Similar principles should be considered when assessing environmental impacts and outcomes associated with major infrastructure projects.

The EIS should ensure consideration is given to the State and Commonwealth legislative standards and outcomes regarding environmental impacts including; native vegetation clearance, offsets and threatened species, groundwater and surface water impacts and management, rehabilitation expectations, including post construction site remediation and environmental monitoring

8. Assess cumulative social impacts on pastoralists and traditional owners

The EIS should evaluate cumulative social impacts associated with multiple concurrent projects operating across the region. Pastoralists and traditional owners are increasingly required to engage with multiple industries and projects simultaneously. This may result in consultation fatigue, increased administrative burden, delays in project assessments and reduced stakeholder capacity to participate effectively in engagement processes.

The EIS should carefully consider cumulative impacts arising from interactions between Northern Water Project requirements and existing obligations already applying to explorers and miners, including environmental approvals, native title negotiations, cultural heritage processes and land access arrangements with pastoralists. Attention should be given to ensuring that the project does not create unintended delays, capacity constraints or additional burdens that may affect the timely progression of existing and future exploration and mining activities.

9. Assess impacts on native title and cultural heritage survey capacity

The EIS should specifically examine the availability of native title and cultural heritage survey capacity across the project region. Many traditional owner groups are already managing substantial workloads associated with mineral exploration and mining activities.

Northern Water Project requirements may:

- Increase existing project backlogs
- Delay agreement-making processes

- Reduce availability of heritage survey teams
- Divert limited traditional owner resources from existing projects

Where capacity constraints are identified, and with the long lead time for the project, it is possible that the SA Government can support Traditional Owners to develop additional human resources to ensure the project does not adversely affect the timely progression of exploration and mining activities and other projects in the region.

Final comments

AMEC supports the development of sustainable water infrastructure and acknowledges the opportunity the Northern Water Project may create for future mining developments in northern South Australia. The project has the potential to facilitate future resource investment and regional growth. However, these benefits must be balanced against impacts on existing exploration and mining activities, future mineral discoveries and access to prospective ground.

By strengthening consultation, assessing cumulative impacts, modernising South Australia's Multiple Land Use Framework and protecting future mineral development opportunities, the Northern Water Project can be a model for the successful coexistence of major infrastructure and continued growth of all exploration and mining sector projects in the region.

Continued engagement

AMEC thanks DIT for the opportunity to contribute to the EIS process and encourages ongoing engagement with the resources sector as project planning progresses. We look forward to stronger and more targeted engagement with affected mineral explorers, developers and industry representatives throughout the EIS process and, should the project proceed, across the life of the project.

Given that most companies holding exploration and other mining licences in the project area are AMEC members (see Attachment 1), AMEC would be pleased to facilitate a consultation forum with affected member companies and DIT representatives. This would provide DIT with direct access to relevant industry expertise and help ensure the views of affected explorers and developers are appropriately considered throughout the assessment process.

For further information contact:

Peta Abbot, Director South Australia – 0475 834 554 | peta.abbot@amec.org.au

CONFIDENTIAL – Commercially Sensitive Information

Attachment 1 – Exploration and other Mining Licence Holders in the Northern Water Project area¹

Company	AMEC Member
Alligator Energy	Yes
Altair Minerals	No
BHP	No
Coda Minerals	Yes
Discover Co Incl. Pernatty Co Pty Ltd, Yandan Gold Mines Pty Ltd & Gold Road Resources (now Gold Fields)	Yes
Fortescue	Yes
PTR Minerals	Yes
Strategic Energy Resources	Yes

¹ Source: South Australian Resources Information Gateway: <https://map.sarig.sa.gov.au/> and the Northern Water Project map on: [About the Project | Northern Water](#). Accessed 7 August 2026.

