


## Approval notice and statement of reasons

### *Petroleum (Environment) Regulations 2016 (NT) (Regulations)*

Interest holder	Central Petroleum Mereenie Pty Ltd ABN: 66 605 831 025 Echelon Mereenie Pty Ltd ABN: 72 650 386 360 Cue Mereenie Pty Ltd ABN: 22 650 385 336 Horizon Australia Energy Pty Ltd ABN: 95 673 423 295  Nominated Operator: Central Petroleum Limited (CTP) ABN: 72 083 254 308
Petroleum interest(s)	Production Licence 4 (OL4)
Environment management plan (EMP) title	Mereenie Appraisal Wells WM31/WM32
EMP document reference	CTP9-2 prepared by Central Petroleum Limited dated 20 February 2025
Regulated activity	<ul style="list-style-type: none"> <li>• Land clearing (4.16 ha)</li> <li>• Construction of well site access track, well site hardstand area, and vehicle turnarounds</li> <li>• Construction of well site infrastructure including hardstand, engineered and high-density polyethylene (HDPE) lined turkey nests for water storage and drilling sump, steel-lined (and hydro tested) flare pit, temporary worksite sheds and turnarounds</li> <li>• Use of either an existing camp or a temporary 50-man accommodation camp at a previously cleared and operational area</li> <li>• Drilling 2 conventional petroleum appraisal wells</li> <li>• Flaring of gas</li> <li>• Well testing, completion, decommissioning</li> <li>• Installation and commissioning of above and below-ground flowlines from wellhead to gathering network</li> <li>• Storage management and on-site disposal of drill cuttings and residual drill fluids</li> <li>• Rehabilitation of wells and well sites</li> </ul>
Is the EMP a new plan submitted under reg 6 or a revision of a current plan submitted in accordance with reg 18, or regs 15 and 17?	This is a new plan submitted under reg 6.
Was the regulated activity referred <sup>1</sup> for consideration whether environmental impact assessment was required?	No

<sup>1</sup> This means a referral under the *Environment Protection Act 2019* (NT) (EP Act) and/or the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act).

Was environmental impact assessment <sup>2</sup> required?	N/A
Has an environmental approval <sup>3</sup> been issued for the regulated activity?	N/A
Has an Authority Certificate under the Northern Territory <i>Aboriginal Sacred Sites Act 1989</i> been issued for the regulated activity?	Yes Authority Certificate C2023/105
Date an EMP compliant with reg 8 was first submitted under reg 6	24 October 2024
Date within which the EMP was published for comment under reg 8A, if applicable	4 November 2024 to 3 December 2024
Date further information was required and submitted under reg 10, if applicable	19 December 2024 (requested) 13 February 2025 (received)
Date of resubmission notice under reg 11(2)(b), if applicable	19 December 2024 (requested) 13 February 2025 (received)
Date EMP was resubmitted under reg 11(3), if applicable	N/A
Date a notice setting out a proposed timetable for consideration of the EMP was issued under reg 11(2A), or reg 11(3)(c), if applicable	N/A
Proposed timetable given in notice under reg 11(2A), or reg 11(3)(c), if applicable	N/A
Where provided under s29B of the <i>Northern Territory Environment Protection Authority Act 2012</i> (NT) (NT EPA Act), the dates the Northern Territory Environment Protection Authority (NT EPA) was requested to, and provided, advice on EMP	N/A
Date of decision	18 / 3 / 2025
Decision maker	 Signature The Hon Joshua Burgoyne MLA, Minister for Lands, Planning and Environment

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1. I approve the EMP under reg 11(3)(a)(i).
2. The approval is subject to the following conditions:

**Condition 1:** Within 30 days of completing land clearing or other ground disturbing activities (being all ground disturbing activities, including earth moving, land clearing, use of gravel pits, establishment of well pads, and establishment of access tracks), the interest holder must submit to [Onshoregas.DLPE@nt.gov.au](mailto:Onshoregas.DLPE@nt.gov.au) geospatial files (as shapefiles and inclusive of metadata).

<sup>2</sup> This means a requirement for an environmental impact assessment to be conducted under the EP Act and/or the EPBC Act.

<sup>3</sup> This means an approval granted under the EP Act and/or the EPBC Act.



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**Condition 2:** By 1 October of each year, the interest holder must submit to [Onshoregas.DLPE@nt.gov.au](mailto:Onshoregas.DLPE@nt.gov.au) a completed Annual Environmental Performance Report (AEPR) for the preceding 12 month period of 1 July to 30 June using the AEPR template. The AEPR template must be completed in accordance with the *Onshore Petroleum Annual Environmental Performance Reporting Guideline* (21 December 2023) as updated from time to time.

**Condition 3:** Where activities occur during the Wet Season (as defined in the Code), the interest holder must submit to [Onshoregas.DLPE@nt.gov.au](mailto:Onshoregas.DLPE@nt.gov.au) weekly reports with the following information:

- i. daily inspection reports for secondary containment in use and, where relevant, the type and date of corrective actions taken, or date proposed to be taken, in response to issues identified in the daily inspection reports.

**Condition 4:** During drilling activities, the interest holder must record the date, time and position title of the officer who conducted the daily inspection, and must submit to [Onshoregas.DLPE@nt.gov.au](mailto:Onshoregas.DLPE@nt.gov.au) a weekly report with the following information:

- i. the daily freeboard available in drill cutting pits (in cm) and the time of measurement; and
- ii. whether any non-compliances with legal requirements were identified in the daily inspections and, if relevant, corrective actions taken, or proposed to be taken, and the timeframe for implementation of corrective actions, in response to the non-compliances.

**Condition 5:** The interest holder must submit the weekly reports required by conditions 3 and 4 by 5pm ACST each Monday for the preceding week or part thereof.

**Condition 6:** By 31 October of each year, the interest holder must submit to [Onshoregas.DLPE@nt.gov.au](mailto:Onshoregas.DLPE@nt.gov.au) the emissions report required by clause D.6.2<sup>4</sup> of the Code, which must:

- i. calculate emissions in accordance with the National Greenhouse and Energy Reporting (Measurement) Determination 2008;
- ii. document actual annual greenhouse gas emissions from conduct of the regulated activity estimated and reported under the Commonwealth *National Greenhouse and Energy Reporting Act 2007* (NGER Act) versus predicted emissions in the EMP (unique EMP reference code);
- iii. demonstrate the actual emissions have been verified by an auditor registered under the Register of Greenhouse and Energy Auditors established under section 75A of the NGER Act;
- iv. include a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and
- v. account for differences between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions.

**Condition 7:** The interest holder must record all releases of liquid or mud contaminant or hazardous chemicals in a site spill register, which records:

- i. the liquid contaminant or hazardous chemical spilled or leaked;

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<sup>4</sup> Clause D.6.2(b) of the Code requires annual actual greenhouse gas emissions to be provided even where emissions are below the NGER Act threshold of 25 ktCO<sub>2</sub>-e for scope 1 and scope 2 emissions reporting.

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- ii. the GPS co-ordinates of the location of the spill or leak;
- iii. the source and volume of the spill or leak;
- iv. the volume of impacted soil removed for disposal and the depth of any associated excavation;
- v. the location impacted soil is transferred to; and the corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.

**Condition 8:** Within 90 days of the financial year anniversary of the approval of the EMP (CTP9-2), and thereafter annually, the interest holder must provide a rehabilitation report which:

- i. provides the dates vegetation monitoring analogue sites were established and surveyed during the preceding 12 month period;
- ii. provides the dates rehabilitation monitoring was undertaken during the preceding 12 month period;
- iii. analyses and compares rehabilitation progress against analogue sites and the rehabilitation criteria in the EMP;
- iv. includes corrective actions identified for rehabilitated areas and the date those corrective actions were implemented, or the date they are proposed to be implemented; and
- v. is accompanied by geospatial files (as shapefiles and inclusive of metadata) identifying the areas rehabilitated during the preceding 12 month period.

**Condition 9:** The interest holder must keep records of a visual inspection and undertake repeat performance testing of a flare pit if any of the following conditions are met:

- i. any activity that could result in introduction of any wastewater
- ii. more than 12 calendar months have passed between use of a flare pit to contain wastewater, or
- iii. a visual inspection of the flare pit identifies structural defects in the integrity of the liner.

The visual inspections should be sufficient to detect structural defects which could influence the capacity of the flare pit to contain wastewater.

**Condition 10:** The interest holder must undertake six-monthly testing of the quality of all wastewater produced from petroleum wells, consistent with clause C.5.5(c) of the Code of Practice: Onshore Petroleum Activities in the Northern Territory (2025), with the first testing to be undertaken within six months of the production of wastewater.

**Condition 11:** The interest holder must provide a report consistent with the requirements of regulation 37B(2) to [Onshoregas.DLPE@nt.gov.au](mailto:Onshoregas.DLPE@nt.gov.au) within 90 days of the second testing event referred to in condition 10, inclusive of a full human health risk assessment, in accordance with regulations 37B(2A) and 4A.

**Condition 12:** The interest holder must review the results of testing undertaken in condition 10 to ensure:

- i. the wastewater and spill management practices in the EMP remain appropriate for the concentrations of analytes detected; and
- ii. the storage, treatment and transport of wastewater remain consistent with legislated requirements for NORMs and listed waste; and



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- iii. The human health risk assessment undertaken in accordance with condition 11 remains applicable to the type and concentrations of analytes detected.

**Condition 13:** A Well Operations Management Plan in relation to the activities covered by the Mereenie Appraisal Wells – WM31/32 Environment Management Plan (CTP9-2) must be approved by the Minister for Mines and Energy prior to the commencement of any drilling activities.

## 2 Material considered

1. The following material has been taken into account in making this decision:
  - a. Mereenie Appraisal Wells WM31/WM32 EMP, 20 February 2025.
  - b. The principles of ecologically sustainable development referenced in reg 5A and the approval criteria set out in reg 9(1).
  - c. The Authority Certificate issued under the *Northern Territory Aboriginal Sacred Sites Act 1989*.
  - d. The Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code)

## 3 Statement of reasons

1. The EMP meets the approval criterion in reg 9(1)(a), because it contains all the information required by Schedule 1 of the Regulations. reg 9(1)(a)
2. I have taken into account the approval criterion in reg 9(1)(b) by noting the nature and scale of the regulated activity and bearing it in mind during my consideration of the impacts and risks. In particular, I note that: reg 9(1)(b)
  - a. The nature of the regulated activity is as follows:
    - i. development of two well pads,
    - ii. construction of wellsite infrastructure including one turkey nest, drilling sump and flare pit at each well site,
    - iii. development and either completion or decommissioning of two conventional gas wells,
    - iv. development of flowlines,
    - v. land clearing for the purposes of the above activities,
    - vi. operation of one temporary camp on a pre-cleared area,
    - vii. well testing and flaring of gas,
    - viii. site demobilisation,
    - ix. rehabilitation of disturbed areas back to its original land use.
  - b. The scale of the regulated activity is as follows:
    - i. No new surface disturbance for Option A, or a total area of 4.16 ha for Option B.
    - ii. an estimated groundwater usage of 3.65 ML,
    - iii. a peak traffic movement for the regulated activity of 20 vehicles per day consisting of approximately 40% being heavy vehicles,
    - iv. a workforce of up to 72 personnel,
    - v. flow testing and flaring equivalent of 8 days,
    - vi. a predicted upper limit of emissions of 3,475 tCO<sub>2</sub>-e (total) this accounts for all components of this regulated activity including the production testing and flaring.
3. The approval criteria in reg 9(1)(c) requires that I be satisfied that the activity will be carried out in a manner by which the environmental impacts and environmental risks of the activity will be reduced to a level that is both: (i) as low as reasonably reg 9(1)(c)



practicable; and (ii) acceptable. In assessing whether the EMP meets the approval criteria, I note that my decision is a prescribed decision (under reg 5A) for s 6A of the Act, and as such requires me to consider and apply the principles of ecologically sustainable development. In accordance with reg 12(3), I provide the following information about how the EMP meets the approval criteria, and the manner in which I have taken into account the principles of ecologically sustainable development when considering whether or not the plan meets the approval criteria.

4. The principles of ecologically sustainable development are defined at section 18-24 of the *Environment Protection Act 2019*, and I address each in turn:
  - a. The decision-making principle (s 18 *Environment Protection Act 2019*) requires effective integration of long-term and short-term environmental and equitable considerations, and for processes to provide for community involvement in relation to decisions and actions that affect the community. Related to this, I note the following:
    - i. The regulated activity is low impact and of short duration 151 days plus rehabilitation and forms one component of a broader onshore petroleum program in the region. The regulated activity will inform decision-making about longer-term petroleum activities.
    - ii. Public consultation on the EMP was required under the Petroleum (Environment) Regulations 2016, as the EMP proposes drilling activities. The EMP was made available for public comment for 28 days from 4 November 2024 to 3 December 2024. The Department received no public submissions on the EMP.
    - iii. The NTG agencies comments were addressed by the interest holder via an updated EMP.
    - iv. I am satisfied that the community had a reasonable opportunity to be involved in processes in relation to this decision.
    - v. Next, I have considered short-term and long-term environmental impacts of carrying out the regulated activity. Environmental impacts include direct and indirect effects on the physical, biological, economic, cultural and social aspects of the environment, and may include cumulative impacts or occur over time.
    - vi. The information before me suggests short-term environmental impacts are negligible if the regulated activity is undertaken in the manner detailed in the EMP in addition to the conditions of approval.
    - vii. The information before me suggests long-term environmental impacts are negligible if the regulated activity is undertaken in the manner detailed in the EMP in addition to the conditions of approval.
    - viii. There is no particular contest between economic, social and environmental considerations that requires further mention.
    - ix. Taking an integrated view of long-term and short-term environmental and equitable considerations, I am satisfied that the considerations on balance and taken together support approval of the EMP.
  - b. The precautionary principle (s 19 *Environment Protection Act 2019*) applies when there are threats of serious or irreversible environmental damage and requires that lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. I am satisfied that the regulated activity does not pose a threat of serious or irreversible environmental damage.



- i. I have carefully evaluated the proposed precautionary measures against the risk-weighted consequences of impacts given the options available, and with a view to avoiding serious or irreversible damage to the environment wherever practicable. The EMP combined with the conditions I have imposed mitigates risks of serious or irreversible damage due to lack of full scientific certainty to a level that is both as low as reasonably practicable and acceptable.
- c. The principle of evidence-based decision-making (s 20 *Environment Protection Act 2019*) requires decisions to be made on the best available evidence in the circumstances that is relevant and reliable. I am of the view that the evidence before me satisfies this requirement for the following reasons:
  - i. The EMP was developed by environmental consultants and the operator and reviewed by the operator's environmental specialist with experience in the Amadeus Basin and/or environmental engineering or management.
  - ii. The interest holder employed a comprehensive process to obtain relevant information including consultation with relevant government agencies, desktop studies, baseline assessments, archaeological assessments and stakeholder engagement in order to support the development of the EMP.
  - iii. The EMP was made available for public comment to identify any deficiencies or additional evidence required from 4 November 2024 to 3 December 2024.
  - iv. The EMP has undergone review and assessment by a multi-disciplinary team in the Department and NT government agencies, which has informed my decision on the EMP.
  - v. The EMP has been modified to address areas of uncertainty, areas of concern or areas requiring clarification. These included the disturbance footprint, cumulative impacts, spill and wastewater management and cultural heritage.
  - vi. No concerns regarding the sufficiency of information to support the modified EMP are apparent from the comments of stakeholders, interested persons, or the internal assessments. I am satisfied that the information before me is comprehensive.
  - vii. I believe the information regarding the proposed regulated activity adequately provides the best available evidence in the circumstances that is relevant and reliable to the evidence-based decision-making process.
- d. The principle of intergenerational and intra-generational equity (s 21 *Environment Protection Act 2019*) requires that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of present and future generations. I have given consideration to the impact on present and future generations as follows:
  - i. This criterion requires me to turn my mind to whether the benefits of the proposal disproportionately burden present or future generations, or particular groups or communities of present or future generations.
  - ii. I have considered whether the health, diversity and productivity of the environment is maintained or enhanced for the benefit of each of the relevant groups and conclude that on the balance, the health, diversity and productivity of the environment is not reduced by the regulated activity.
  - iii. The environmental burdens of the regulated activity will not disproportionately affect particular stakeholders.



- iv. I consider that cumulative emissions are not significant when considered in context of 2022 Northern Territory and Australian emissions, which were approximately 16.73 million tonnes and 432.6 million tonnes respectively.
- v. I have considered the protection of cultural heritage and am satisfied that conduct of the regulated activity will not impact on preservation of cultural heritage for the benefit of future generations.
- vi. Cultural values relating to sacred sites will be protected through the application of Authority Certificates issued to the interest holder under the *Northern Territory Aboriginal Sacred Sites Act 1989* and measures for reporting on discovery of archaeological sites during activities.
- vii. Accordingly, I do not believe that the carrying out of the regulated activity in accordance with the EMP would have an effect contrary to the principle of inter or intra-generational equity.
- e. The principle of sustainable use (s 22 *Environment Protection Act 2019*) requires that natural resources should be used in a manner that is sustainable, prudent, rational, wise and appropriate. In applying this principle, I have considered the following:
  - i. The total anticipated water demand for this regulated activity is 3.65 ML, which is approximately 4.6% of Central Petroleum Mereenie Pty Ltd.'s annual maximum water entitlement of 52.8 ML. Existing licensed groundwater bores will be used to meet the drilling water requirements.
  - ii. No additional groundwater extraction licences are required for the regulated activity.
  - iii. I note that the EMP has assessed the cumulative impacts of groundwater extraction from the Mereenie Sandstone aquifer and a groundwater extraction licence has been granted (M10001).
  - iv. Accordingly, I am satisfied that the concept of sustainable use of natural resources has been taken into account.
- f. The principle of biological diversity and ecological integrity (s 23 *Environment Protection Act 2019*) requires that biological diversity and ecological integrity should be conserved and maintained. I have applied this principle as follows:
  - i. I believe the information I have regarding the existing biodiversity and ecosystems that are to be affected by the regulated activity; the effects that are likely; and the mitigation measures reasonably available, is sufficient.
  - ii. The regulated activity poses a low risk to the ecosystem within the MacDonnell Ranges bioregion. Given the relatively small area of impact (approximately 4.16 ha), and the very large area of similar habitat within the region, the regulated activity does not pose a significant risk to any regional populations of threatened species.
  - iii. The Department's Flora and Fauna Division is satisfied that the regulated activity does not pose a significant risk to threatened species, important habitats or significant vegetation types.
  - iv. The mitigation controls identified in the EMP are adequate to reduce risks associated with potential impacts on biodiversity, such as noise, vehicle strike, dust, erosion and spills to be as low as reasonably practicable.
  - v. The EMP outlines measures to minimise impacts on environmental values, including the management of threatening processes such as weeds and fire. Where relevant, management measures are consistent with the requirements



of the Code, the NT Land Clearing Guidelines and Weed Management Planning Guideline: Onshore Petroleum Projects. Specific precautions to ensure interaction with wildlife is avoided are included in the EMP, including inspections for fauna presence, fauna ladders, on sumps and pits, fencing around well sites, use of speed limits on access tracks, and daily checks of infrastructure.

- vi. The conservation of biological diversity and ecological integrity is vital to the achievement of ecologically sustainable development. Given the fundamental nature of this consideration, I have given importance to the conservation of biological diversity and ecological integrity in weighing whether I am satisfied the approval criterion in reg 9(1)(c) have been met.
- vii. It is often the case that the conservation of biological diversity and ecological integrity is vital to the achievement of ecologically sustainable development. By their nature, ecosystems are complex and interdependent systems and relationships; this needs to be considered in relation to what preserves their integrity. Biological diversity also represents a wealth of potential natural resources that may provide options for present and future generations. I have born this in mind when considering the weight to be given to the evidence before me regarding the potential impacts of the regulated activity on biodiversity and ecological integrity.
- viii. The measures to conserve and maintain biological diversity and ecological integrity in the EMP are appropriate, given the nature and scale of the regulated activity.
- ix. If carried out in accordance with the EMP, the risks of the regulated activity to the conservation of biological diversity and ecological integrity are considered to be mitigated to an acceptable level.
- g. The principle of improved valuation, pricing and incentive mechanisms (s 24 *Environment Protection Act 2019*) requires that environmental factors should be included in the valuation of assets and services, through application of the 'polluter pays' principles, consideration of full life cycle costs of providing goods and services, and pursuing environmental goals in the most cost-effective way. I have applied the principle as follows:
  - i. The pollution and waste that will be generated by the regulated activity in the general course of its operation includes: emissions (e.g. fuel and venting), liquid waste (e.g. sewage, greywater and drilling fluids), solid waste and hazardous waste (e.g. drill cuttings, batteries, spill contaminated material, domestic waste).
  - ii. I am satisfied that this pollution and waste will be disposed of by the interest holder in accordance with the *Public and Environmental Health Act 2021*, the *Waste Management and Pollution Control Act 1998* and the Code at its own cost as set out in Table 10 and section 3.9 of the EMP.
  - iii. In relation to the risks of a pollution event that may occur unintentionally during the operations of the regulated activity, I consider that the following measures are in place to ensure the interest holder bears the costs of containment, avoidance, and abatement:
    - (1) impacts and risks associated with contamination of soil, surface water and groundwater, which are managed through meeting mandated requirements for well integrity and clean-up of spills, leaks and remediation of impacted soil,



- (2) impacts and risks associated with loss of containment of wastewater, which are managed through containment measures.
- iv. In relation to full life cycle costs, it is expected that the regulated activity will have a life cycle of 6 months plus ongoing rehabilitation, and at the end of this cycle the interest holder will take action to decommission the wells or transfer them to the Mereenie Oil and Gas Field EMP (CTP6-4) where any residual pollution and waste not dealt with by this EMP (CTP9-2) will be managed in accordance with the CTP6-4 EMP prior to the return of environmental securities held under this EMP.
  - v. All interest holders are required to provide an environmental security related to the activities in an EMP, prior to commencement of the activities. It must be sufficient to allow third party intervention for rehabilitation and remediation should it be required, ensuring the interest holder bears the cost of pollution.
  - vi. With these measures in place, I am satisfied that the EMP ensures that environmental costs are not left as externalities to be paid for by Territory taxpayers or the local community. They will be fairly paid for by those who stand to benefit from the regulated activity, such as the interest holder, and consumers who choose to purchase the interest holder's products. To the extent there are some costs to the Territory, I am satisfied that this is appropriate given the broader economic benefits.
  - vii. In relation to options to pursue environmental goals in relation to the regulated activity, I have taken into account that these goals should be pursued in the most cost-effective way. This is the case with regard to the conditions set for liners and hydrotesting of flare pits. The conditions reflect a balanced approach to managing the risks of contamination in a cost effective and reasonable manner. I believe approval of the EMP with the conditions I have imposed is consistent with the principle of improved valuation, pricing and incentive mechanisms.
  - h. The EMP was not referred under the *Environment Protection Act 2019*, as the regulated activity does not have the potential to cause a significant impact on the environment. reg 9(3)
  - i. The existing environment along with its particular values and sensitivities is appropriately identified in section 4 of the EMP, and to the extent I do not agree or there is some uncertainty, I have imposed conditions to address the relevant risk or risks. reg 9(1)(c)
  - j. I agree with the risk assessment set out in Appendix E of the EMP, and to the extent I do not agree I have imposed a condition or conditions to address the relevant risk or risks.
  - k. The interest holder's risk assessment is applicable to activities in all seasons and the outcomes are reflected in the EMP that includes, for example; Wet Season Management Plan (section 7.1/Table 31); Erosion and Sediment Control Plan (section 7.2/Table 32); Weed Management Plan (section 7.3/Table 33); Bushfire Management Plan (section 7.4/Table 34); Rehabilitation Management Plan (section 7.5/Table 35); Wastewater Management Plan (section 7.6/Table 36); Spill Management Plan (section 7.7/Table 37); Methane Emissions Management Plan (section 7.8/Table 38); Mereenie Emergency Response Plan (Appendix F) and Drilling Fluid Chemicals (Table 11). This is consistent with the requirements of the Code that allows for the regulated activity to occur in the wet season

months when contingency planning is provided and minimum freeboard in wastewater infrastructure is maintained.

- l. The anticipated environmental impacts are appropriately identified in section 6 and Appendix E of the EMP. The regulated activity are a continuation of current activities and cumulative effects have been identified and assessed. In EMPs for subsequent stages (if they proceed) the interest holder will need to continue to address cumulative effects.
- m. The EMP demonstrates how the interest holder will comply with relevant requirements of the Code in undertaking these regulated activity. This includes reference to applicable Australian and international standards that have been adopted for regulated activity, as applicable. The EMP cross references relevant sections of the Code that apply to the mitigation and management measures to enable the reviewer to identify and confirm that the proposed activities comply with the Code, as applicable. The EMP provides water management commitments and management plans that meet the requirements of the Code.
- n. I am satisfied that the interest holder has conducted ongoing stakeholder engagement in accordance with the Regulations. The EMP provides details of stakeholder engagement that meets Regulation 7 and Schedule 1, Clause 9 of the Regulations (Section 5, Appendix C and Appendix D). Stakeholder engagement records (Appendix C and Appendix D) demonstrate that stakeholders did not raise objections about environmental impacts of the proposed activity that required specific changes from the interest holder.
- o. I recognise the importance the community places on the protection of water, human health management of chemicals and waste, stakeholder engagement, social impacts and regulation and compliance. The EMP appropriately identifies the risks and potential impacts from the regulated activity and commits to mitigation and management measures to address these risks and potential impacts.
- p. There are no environmental impacts or environmental risks relating to the proposed regulated activity that I consider to be unacceptable.
- q. Overall, having regard to the above, I am satisfied that the EMP is appropriate for the nature and scale of the activity, and demonstrates that the regulated activity is to be carried out in manner by which the environmental impacts and environmental risks are reduced to a level that is:
  - i. as low as reasonably practicable; and
  - ii. acceptable.