

Approval notice and statement of reasons


Petroleum (Environment) Regulations 2016 (NT) (Regulations)

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| Interest holder | BR Simpson Pty Ltd (BRS) ACN 614 132 624 |
| Petroleum interest(s) | Exploration Permits 93, 97 & 107 (EP93, EP97 & EP 107) |
| Environment management plan (EMP) title | Simpson Desert Seismic EP93, EP97 & EP107 |
| EMP document reference | BRS1-5 |
| Regulated activity | <ul style="list-style-type: none"> establishment of 10 seismic lines (~644 km) acquisition of 2D seismic data establishment and use of three temporary camps land clearing for camps, seismic lines, new tracks and re-establishment of existing tracks (~119 ha) rehabilitation |
| 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 ¹ for consideration whether environmental impact assessment was required? | No |
| Was environmental impact assessment ² required? | N/A |
| Has an environmental approval ³ 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 C2021/010 Authority Certificate C2021/011 Authority Certificate C2021/012 |
| Date an EMP compliant with reg 8 was first submitted under reg 6 | 7 December 2022 |
| Date within which the EMP was published for comment under reg 8A, if applicable | N/A |
| Date further information was required and submitted under reg 10, if applicable | 7 February 2023 (requested) 1 March 2023 (submitted) 13 June 2023 (re-submitted) 4 July 2023 (requested) 8 August 2023 (submitted) 21 August 2023 (requested) 9 September 2023 (submitted) |
| Date of resubmission notice under reg 11(2)(b), if applicable | 15 February 2023 (requested) |

¹ 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)*.

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

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

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| Date EMP was resubmitted under reg 11(3), if applicable | 13 June 2023 (submitted) 8 August 2023 (submitted) 9 September 2023 (submitted) |
| 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 | Date of Minister's request for advice: 25 February 2019 Date of NT EPA Advice: 25 September 2023 NTEPA2022/0167-006~0001 |
| Date of decision | 9/10/2023 |
| Decision maker |  Signature |
| | Hon Lauren Jane Moss MLA, Minister for Environment, Climate Change and Water Security |

1 Approval notice

1. I approve the EMP (BRS1-5) under 11(3)(a)(i).
2. The approval is subject to the following conditions:

Reporting Conditions

Condition 1: During seismic activities (being seismic line preparation, seismic survey and rehabilitation of seismic lines) and civil works (being earth moving and land clearing for establishment of access tracks and camps) the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a weekly activity report with the following information:

- a. the length of seismic lines completed and/or respread with vegetation, with reference to the seismic line number;
- b. any significant rainfall events occurring (greater than 25 mm in a 24-hour period) threatening the activity;
- c. the outcome of inspections of erosion and sediment control measures, and corrective actions taken; and
- d. all dates the regulated activity was stopped due to Wet Season events and the date and time that the regulated activity recommenced, or is proposed to recommence.

Condition 2: The interest holder must submit the weekly reports required by condition 1 by 5 pm ACST each Monday for the preceding week or part thereof.

Condition 3: Within 30 days of completing seismic activities or any other land clearing, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au geospatial files (as shapefiles consisting of polygons, not line or point data and inclusive of metadata), identifying the location of:

- a. seismic lines;

- b. camp locations;
- c. clearing undertaken for access;
- d. any buffers applied for the purpose of avoiding listed species or their habitat and cultural heritage sites during land clearing; and
- e. the location of stream crossings and claypan crossings.

Condition 4: Within three business days of 31 March, 30 June, 30 September and 31 December of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a report with the following information:

- a. regulated activities completed in the previous quarter;
- b. regulated activities to be conducted in the next quarter, including estimated duration;
- c. the date any conditions of this approval were completed in the previous quarter;
- d. the date any conditions of this approval are due for completion in the next quarter; and
- e. monitoring and compliance activities to be conducted in the next quarter based on commitments in the approved EMP, relevant to the stage of a regulated activity.

Condition 5: By 1 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a completed Annual Environment Performance Report Template for the preceding 12 month period of 1 July to 30 June. The Template must be completed in accordance with the *Onshore Petroleum Annual Environmental Performance Reporting Guideline (28 October 2021)*.

Condition 6: Within 90 days of the anniversary of the approval of the EMP, the interest holder must provide a rehabilitation report to DEPWS, via Onshoregas.DEPWS@nt.gov.au, which must:

- a. provide the dates rehabilitation monitoring sites and analogue sites were surveyed during the preceding 12 month period;
- b. analyse and compare rehabilitation progress against analogue sites and the rehabilitation criteria in the EMP;
- c. include corrective actions identified for rehabilitated areas and the date those corrective actions were implemented, or the date they are proposed to be implemented; and
- d. be accompanied by geospatial files (as shapefiles as polygons and point data and inclusive of metadata) identifying the locations of monitoring sites and the areas considered rehabilitated during the previous 12 month period.

Greenhouse Gas Emissions Condition

Condition 7: By 31 October 2024 and annually if the activity extends beyond this date, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au the emissions report required by clause D.6.2 of the *Code of Practice: Onshore Petroleum Activities in the Northern Territory (2019) (the Code)*⁴, which must:

- a. calculate emissions in accordance with the National Greenhouse and Energy Reporting (Measurement) Determination 2008;
- b. document actual annual greenhouse gas emissions from conduct of the regulated activity estimated and reported under the *Commonwealth National Greenhouse and*

⁴ 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 ktCO₂-e for scope 1 and scope 2 emissions reporting.

Energy Reporting Act 2007 (NGER Act) versus predicted emissions in the EMP (BRS1-5);

- c. include a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and
- d. account for differences between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions.

Incident Management Condition

Condition 8: The interest holder must record all accidental releases of liquid contaminant or hazardous chemicals in a site spill register, which records:

- a. the liquid contaminant or hazardous chemical spilled or leaked;
- b. the GPS co-ordinates of the location of the spill or leak;
- c. the source and volume of the spill or leak;
- d. the volume of impacted soil removed for disposal and the depth of any associated excavation; and
- e. the corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.

Monitoring Condition

Condition 9: No later 30 days prior to undertaking regulated activities the interest holder must submit to Onshoregas.DEPWS@nt.gov.au, a succinct table detailing all inspections and monitoring that will be completed under the EMP, that will form part of the approved EMP, and includes:

- a. each monitoring or inspection action;
- b. the frequency of the monitoring or inspection action;
- c. the party responsible for carrying out the monitoring or inspection action; and
- d. the relevant environmental performance standard/s and measurement criteria related to the monitoring or inspection action.

2 Material considered

1. The following material has been taken into account in making this decision:
 - a. Environment Management Plan Simpson Desert Seismic EP93, EP97 & EP107 (BRS1-5).
 - b. The principles of ecologically sustainable development referenced in reg 5A and the approval criteria set out in reg 9(1).
 - c. The NT EPA advice provided at my request under s 29B of the NT EPA Act.
 - d. The three Authority Certificates issued under the *Northern Territory Aboriginal Sacred Sites Act 1989*
 - e. 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. Civil works including the establishment of 10 seismic lines, three temporary camps, and new tracks
 - ii. acquisition of 2D seismic data
 - iii. Rehabilitation.
 - b. The scale of the regulated activity is as follows:
 - i. The total area of surface disturbance area is ~454 ha with ~119 ha of vegetation clearing.
 - ii. The estimated groundwater use is 1 ML.
 - iii. Peak traffic movements for the regulated activity is 16 light vehicles and 6 heavy vehicles over a single day during mobilisation.
 - iv. The worst case greenhouse gas emissions from the activities totals ~1,664 tCO₂ over the life of the activity.
 - v. Rehabilitation is to be carried out shortly after each seismic line is completed.
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 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. reg 9(1)(c)
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 with up to 80 days of seismic activity and then annual rehabilitation monitoring, as an onshore petroleum exploration program in the region. The regulated activity will inform decision-making about longer-term petroleum activities.
 - ii. The EMP does not propose drilling and hydraulic fracturing activities, however the public was made aware that the EMP was under Assessment via the Department's website.
 - iii. 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.
 - iv. The information before me suggests short-term environmental impacts are manageable with the proposed mitigations in place.
 - v. The information before me suggests long-term environmental impacts are negligible.
 - vi. There is no particular contest between economic, social and environmental considerations that requires further mention.
 - vii. 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 mitigate 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 am satisfied that the best available evidence has been obtained because:
 - i. The EMP was developed by environmental consultants, including an ecologist with experience in the Central Australia region and two archaeologists.
 - ii. The interest holder employed a comprehensive process to obtain relevant information including a baseline ecological assessment, cultural heritage assessment, stakeholder engagement, consultation with neighbouring title

- holders for cumulative activities and consultation with NT Government agencies.
- iii. The EMP has undergone review and assessment by a multi-disciplinary team in DEPWS and NT government agencies, which has informed my decision on the EMP.
 - iv. The interest holder has modified the EMP to address areas of uncertainty or requiring clarification.
 - v. No concerns regarding the sufficiency of information to support the EMP are apparent from stakeholders and interested persons.
 - vi. 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 the use of groundwater and am satisfied that the proposed use will not result in either short-term or long-term impacts to other groundwater users.
 - iii. I have considered the benefit for future generations from increased economic activity in the region and am satisfied that exploration is a necessary precursor for future economic gains that may be achieved through a viable onshore petroleum industry.
 - iv. I have considered whether the health, diversity and productivity of the environment is maintained or enhanced for the benefit of each of these relevant groups. On balance, the health, diversity, and productivity of the environment is not reduced by the regulated activity for each identified group or community.
 - v. The environmental burdens of the regulated activity will not disproportionately affect particular stakeholders.
 - vi. I have considered cumulative emissions and note that the contribution from this activity is negligible. The emissions are not considered significant in context of 2020-21 NT emissions, which was approximately 17.32 million tonnes CO₂-e.
 - vii. Cultural values relating to Sacred Sites will be protected through the application of three Authority Certificates issued to the interest holder under the *Northern Territory Aboriginal Sacred Sites Act 1989*.
 - viii. 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. I note the findings of the Scientific Inquiry into Hydraulic Fracturing (HFI) in the NT that states: “... *in the short to medium term, the Australian National Energy Market is likely to require higher levels of flexible, gas-fired generation, which can provide a reliable, low emissions substitute for ageing coal-fired generation, and essential security services to complement variable renewable electricity generation.*”⁵
 - ii. I note the NT Government’s commitment to implementing all the recommendations of the HFI, including working with the Australian Government to seek to ensure that there is no net increase in lifecycle GHG emitted in Australia from any onshore petroleum produced in the NT.
 - iii. There are no cumulative impacts from groundwater extraction beyond seismic activity (~1 ML) and current pastoral usage.
 - iv. No groundwater extraction licences are currently required for the regulated activity. Any future consideration of groundwater use will include an application for an extraction licence.
 - v. 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 EMP identifies 17 listed threatened species and 9 migratory species listed as threatened under the EPBC Act and/or the *Territory Parks and Wildlife Conservation Act 1976* (TPWC Act). The assessments of the likelihood of occurrence indicates seven listed threatened species that may occur in the wider landscape, based on habitat suitability and previous records. These includes Waddy-wood (*Acacia peuce*), Bird’s nest Wattle (*Acacia pickardii*), the Plains Mouse (*Pseudomys australis*), the Thick-billed Grasswren (western) (*Amytornis modestus indulkanna*), the Grey Falcon (*Falco hypoleucos*), the Bronzeback (*Ophidiocephalus taeniatus*), and the Crest-tailed Mulgara (*Dasyercus cristicauda*). The remaining identified species were assessed as having a low or no likelihood of occurring within the project footprint. The interest holder has committed to implementing buffers to avoid impacts to listed species if sighted during seismic line establishment.
 - iii. The mitigation controls identified in the EMP are adequate to reduce risks associated with potential impacts on biodiversity, such as clearing, vehicle strike, noise, dust and erosion to be as low as practicable.
 - iv. The EMP details controls to minimise impacts on affected environmental values, including the management of threatened processes for weeds, fire and clearing. Where relevant, management measures for the threatening processes are consistent with the requirements of the Code, NT Land Clearing Guideline and Weed Management Planning Guideline: Onshore Petroleum Projects. Specific controls include buffering and avoiding of sensitive features, installation and maintenance of camp firebreaks,

⁵ Refer section 9.7.4 of the *Scientific Inquiry into Hydraulic Fracturing in the Northern Territory*; p 233. Available at: <https://frackinginquiry.nt.gov.au/inquiry-reports?a=494286>

- requirement to have vehicle weed hygiene declarations prior to entry to site, and ongoing annual weed and rehabilitation inspections.
- v. 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 biodiversity and ecological integrity in weighing whether I am satisfied the approval criterion in reg 9(1)(c) has been met.
 - vi. 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 borne 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.
 - vii. 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.
 - viii. 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 domestic waste, commercial waste and emissions.
 - ii. I am satisfied that hazardous and non-hazardous waste will be disposed of in accordance with the requirements of the *Waste Management and Pollution Control Act 1998* by the interest holder as outlined in the EMP's Waste Management Plan (Appendix I).
 - 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 measures in place as per the Oil Spill Contingency Plan (Appendix J) will ensure the interest holder bears the costs of prevention, containment, avoidance, and abatement. This including commitments for halting transport during significant rain events, spill prevention controls, regular monitoring of storage areas and prompt clean-up of spills and leaks.
 - iv. In relation to full life cycle costs, it is expected that the regulated activity will have a life cycle of 80 days, and at the end of this cycle the interest holder will take action to remove the residual pollution and waste as detailed by the EMP.
 - v. In addition, the interest holder is required to provide an environmental security sufficient to allow third party intervention for the rehabilitation and remediation should it be required, ensuring the interest holder bears the costs of pollution.

- vi. With these measures in place, I am satisfied that the EMP ensures that environmental costs are not left 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.
 - viii. 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 NT EPA did not require the EMP to be 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 NT EPA reviewed the EMP for the regulated activity against the approval criteria in regulations 9(3)(a) and 9(3)(c) of the Regulations and other matters the NT EPA considered relevant, and has provided advice about the EMP.
- i. The NT EPA has provided the following in relation to the regulated activity and the EMP:
- i. In accordance with my request under s 29B of the NT EPA Act, the NT EPA reviewed the EMP against the approval criteria in regulation 9(1) of the Regulations and other matters the NT EPA considered relevant, and has provided advice about the EMP. Relevantly:
 - (1) The NT EPA recommended that should the EMP be approved, it be subject to six conditions. The NT EPA's recommendations have informed the conditions of this approval. All conditions are outlined in section 1(2) of this Approval Notice.
 - (2) The NT EPA concluded that the EMP for the regulated activity, subject to the recommended approval conditions, is appropriate for the nature and scale of the regulated activity and demonstrates that the regulated activity can be carried out in a manner that environmental impacts and environmental risks of the activity will be reduced to a level that is as low as reasonably practical and acceptable.
 - ii. I have considered the NT EPA's advice and recommendations and these have been incorporated where relevant into this Statement of Reasons and the conditions in the Approval Notice.
- j. The existing environment along with its particular values and sensitivities is appropriately identified in Sections 4 and 5 and Appendices A and B in 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)
- k. I agree with the risk assessment set out in Appendix E in the EMP, and to the extent I do not agree I have imposed a condition or conditions to address the relevant risk or risks.
- l. 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; an Erosion and Sediment Control Plan (Appendix F); Weed Management Plan (Appendix G); Bushfire Management Plan (Appendix H); Waste Management Plan (Appendix I);

Oil Spill Contingency Plan (Appendix J); Rehabilitation Management Plan (Appendix K); and the Emergency Response Plan (Appendix L). The EMP also includes required controls for ongoing management of erosion and sedimentation, buffering of sensitive features, dealing with unexpected finds and summarises monitoring schedules.

- m. The anticipated environmental impacts are appropriately identified in Section 7 and Table 7-2 of the EMP and in Appendix E. The regulated activity is a continuation of historical exploration activities in the region 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.
- n. The EMP demonstrates in Table 3-1 in the EMP how the interest holder will comply with relevant requirements of the Code in undertaking the 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.
- o. I am satisfied that the interest holder has conducted ongoing stakeholder engagement in accordance with the Regulations. The EMP provides details of stakeholder engagement in Section 6 of the EMP and in Appendix N that meets Regulation 7 and Schedule 1, Clause 9 of the Regulations. Stakeholder engagement records (Appendix N) demonstrate that stakeholders did not raise objections about environmental impacts of the proposed activity that required specific changes from the interest holder. The EMP provides details of input from stakeholders as part of the stakeholder engagement records. The risk assessment in the EMP details the potential environmental impacts of the activity and proposed environmental outcomes to manage impacts on social and cultural surroundings.
- 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.