

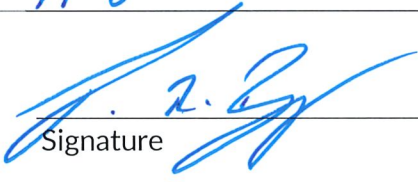
Approval notice and statement of reasons

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

Interest holder	Central Petroleum Limited as an Operator on behalf of Interest holders: Central Petroleum PVGF Pty Ltd ABN 95 009 718 183 NZOG PVGF Pty Ltd 7 ABN 2 650 386 360 Central Petroleum (NT) Pty Ltd ABN 95 009 718 183 NZOG Dingo Pty Ltd ACN 650 385 756 Frontier Oil and Gas Pty Ltd ABN 91 103 194 136
Petroleum interest(s)	Operation Licence 3 (OL3) Production Licence 6 (L6) Production Licence 7 (L7)
Environment management plan (EMP) title	Amadeus EMP
EMP document reference	CTP8-3
Regulated activity	The regulated activities includes: <ul style="list-style-type: none"> • maintenance of existing road and access track • well pad and operational area maintenance/upgrade • installation and maintenance of containment, erosion and sediment controls • well workovers • production activities from existing wells • gathering lines • upgrade of wellhead equipment • land and vegetation management • progressive rehabilitation and closure of redundant facilities/infrastructure • environmental monitoring • construction of new evaporation treatment pond (PV-12) within the existing footprint at Palm Valley Gas Field (PVGF) • decommission, rehabilitation and monitoring of existing evaporation pond (PV-09) at PVGF
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

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.

Has an environmental approval ³ been issued for the regulated activity?	N/A
Has an Authority Certificate under the <i>Northern Territory Aboriginal Sacred Sites Act 1989</i> been issued for the regulated activity?	<ul style="list-style-type: none"> • OL3 – C2025/036 • L6 – C2020/034 • L7 – C2020/032
Date an EMP compliant with reg 8 was first submitted under reg 6	19 December 2023
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	15 March 2024 (requested) 30 April 2024 (submitted) 24 May 2024 (requested) 13 June 2024 (submitted)
Date of resubmission notice under reg 11(2)(b), if applicable	15 March 2024 (requested) 30 April 2024 (submitted)
Date EMP was resubmitted under reg 11(3), if applicable	24 May 2024 (requested) 13 June 2024 (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: 16 July 2024 NTEPA2024/059-003~0011
Date of decision	19 / 6 / 2025
Decision maker	 Signature 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: By 1 October of each year, the interest holder must submit to 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 as updated from time to time.

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

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Condition 2: When the regulated activities occur during the Wet Season, as defined in the Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code), the interest holder must submit to 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; and
- ii. 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.

Greenhouse Gas Emissions Condition

Condition 3: By 31 October of each year, the interest holder must submit to Onshoregas.DLPE@nt.gov.au the emissions report required by clause D.6.2⁴ 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 (CTP8-3);
- iii. include a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and
- iv. 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 4: The interest holder must record all accidental releases of liquid contaminant or hazardous chemicals in a site spill register, which records:

- i. the liquid contaminant or hazardous chemical spilled or leaked;
- 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; and
- v. the corrective actions taken or proposed to be taken to prevent recurrence of an incident of a similar nature.

Rehabilitation Conditions

Condition 5: Progressive rehabilitation must commence no later than 12 months following cessation of the regulated activity at each location ground disturbance has occurred during conduct of the regulated activity.

Condition 6: Within 90 days of the end of the financial year that rehabilitation commences, and thereafter annually, the interest holder must provide a

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.

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rehabilitation report for Palm Valley Gas Field, Dingo Gas Field and Surprise Oil Field 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 7: Before commencing any rehabilitation activities for the PV09 evaporation pond, the Interest Holder must complete an updated Closure Options Assessment Study to Onshoregas.DLPE@nt.gov.au. This study must provide a detailed evaluation of potential closure and rehabilitation techniques, including an environmental impact assessment and a thorough risk assessment. Based on the findings, the study should identify and recommend the best rehabilitation option. The study and its recommended option must be submitted to the Department as a closure plan for review and approval before proceeding rehabilitation activities.

Condition 8: The Interest Holder must develop and submit a monitoring and reporting plan to the Department of Lands, Planning and Environment (DLPE) detailing the procedures for ongoing assessment of the rehabilitation progress. Annual reports must be provided to ensure compliance with the approved closure plan.

Human Health Risk Assessment Conditions

Condition 9: 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, with the first testing to be undertaken within six months of the date of approval of the EMP.

Condition 10: The interest holder must provide a report consistent with the requirements of regulation 37B(2) to Onshoregas.DLPE@nt.gov.au within 90 days of the second testing event referred to in condition 9, inclusive of a full human health risk assessment, in accordance with regulations 37B(2A) and 4A.

Condition 11: The interest holder must review the results of testing undertaken in condition 9 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
- iii. the human health risk assessment undertaken in accordance with condition 10 remains applicable to the type and concentrations of analytes detected.

Wastewater Management Condition

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Condition 12: If flare tanks are to be used for storage of wastewater, they must have secondary containment.

Groundwater Monitoring Condition

Condition 13: Within 90 days of the financial year anniversary of the EMP (CTP8-3), and each subsequent year, the interest holder must submit an interpretative report of groundwater quality to Onshoregas.DLPE@nt.gov.au which includes:

- i. identification of any change to groundwater quality or level attributable to conduct of the regulated activity at the well site(s) and discussion of the significance and cause of any such observed change;
- ii. interpretation of any statistical outliers observed from baseline measured values for each of the analytes listed in Table 6 of the Code;
- iii. a summary of the results including descriptive statistics;
 - ii. discussion of any trends observed;
 - iii. description of the layout of the groundwater monitoring bores and wells. Indicative groundwater flow directions and levels
- iv. develop site-specific performance standards for groundwater quality and interquartile ranges for analytes at each of the impact monitoring bores established, based on at least 3 years of groundwater monitoring.
- v. accompanied by the results of groundwater monitoring in a format to be determined by DLPE.

2 Material considered

1. The following material has been taken into account in making this decision:
 - a. Amadeus Environment Management Plan (CTP8-3) dated 13 June 2024 (EMP).
 - 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 s29B of the NT EPA Act.
 - d. The 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) as set out in reg 4A.

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. The continuation of production activities, including ongoing workover program, the upgrade of above-ground infrastructure with new wellhead equipment, safety systems and gathering lines to be replaced or installed where required at Palm Valley Gas Field (PVGF) and Dingo Gas Field (DGF). General care and maintenance at Surprise Oil Field (SOF), which is currently shut in.
 - b. The scale of the regulated activity is as follows:
 - i. All activities are ongoing and will be conducted on the existing disturbed footprint.
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, ongoing and well understood, given the more than 40 years of operation in the region and the extensive field surveys and studies that have been undertaken in that time.
 - ii. Public consultation on the EMP was not required under the Petroleum (Environment) Regulations 2016, as the EMP does not propose drilling and hydraulic fracturing activities. The public was made aware that the EMP was under assessment via the DLPE website.
 - iii. The NT government agencies comments were addressed by the interest holder via an updated EMP.
 - iv. 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.
 - v. The information before me suggests short-term environmental impacts are negligible with the effective mitigation measures in place.
 - vi. The information before me suggests long-term environmental impacts are negligible with the effective mitigation measures in place.
 - vii. There is no particular contest between economic, social and environmental considerations that requires further mention.
 - viii. 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 am satisfied that the best available evidence has been obtained because:
- i. The EMP was developed by environmental consultant and reviewed by the operator's specialists who have professional qualifications, training, skills and experience on the subject matter of environment, safety, risk management, and petroleum development and operations.
 - ii. The interest holder employed a comprehensive process to obtain relevant information including environmental assessments, baseline studies, field surveys, stakeholder engagement and cultural heritage surveys.

- iii. The EMP has undergone review and assessment by a multi-disciplinary team in DLPE 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 the comments of stakeholders or the internal assessments. On the contrary, they indicate and I am satisfied that the information before me is comprehensive.
 - 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 protection of groundwater from pollution and have set a condition requiring ongoing groundwater monitoring to be conducted.
 - iii. 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.
 - iv. The environmental burdens of the regulated activity will not disproportionately affect particular stakeholders.
 - v. I consider that cumulative emissions are not significant when considered in context of 2022 NT and Australian emissions, which were approximately 16.73 million tonnes and 432.62 million tonnes respectively.
 - vi. 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.
 - vii. 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 civil maintenance activities. No new ground disturbance is planned to occur.
 - 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. No groundwater extraction is proposed for the regulated activity.
 - iii. 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 does not require land clearing, and the potential impacts and risks of the activity identified in the EMP do not pose a significant risk to threatened species. Specific adequate measures for protection of flora and fauna are included in the EMP.
 - iii. The EMP considers fauna species listed as critically endangered, endangered, migratory, vulnerable, migratory or marine under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) Act and conservation significant fauna under the *Territory parks and Wildlife Conservation Act 1976* (NT) based on field survey between 2007 and 2015 at all three fields, the interest holder has demonstrated the regulated activity is highly unlikely to have impact on these species as they have not been recorded except current EPBC listed threatened fauna species, the blackfooted rock wallaby, slater skink and *Petogale lateralis* (status vulnerable) was recorded at OL3 but there was no evidence of the species around any of the project or operational areas. However, the presence of the isolated slater skink individuals immediately north of PV2 operational lay down area at OL3 has resulted in site specific mitigation measures including sediment control banks and flagging of the site to be avoided to minimise risk to slater skinks within the lease area.
 - iv. DLPE’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.
 - v. The EMP outlines measures to minimise risks associated with potential impacts on biodiversity, such as noise, vehicle strike, dust, erosion and spills to be as low as reasonably practicable.
 - 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 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.

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>

- 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, workover fill/cuttings, scrap metals, emissions, sewage, grey water, timber and contaminated soil.
 - ii. I am satisfied that this pollution and waste will be disposed of, recycled or treated by the interest holder at its own cost as set out in Table 8 and section 3.4.3 in 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 and 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 continue into the foreseeable future, and at the end of this cycle the interest holder will take action to remove any residual pollution and waste as detailed by the EMP.
 - v. All interest holders are required to provide an environmental security related to the activities in the EMP, prior to commencement of the activities.
 - 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.
 - 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 a of flare pits. The conditions reflect a balanced approach to managing the risk of contamination in a cost effective and reasonable manner.
 - 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 several 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 A.5, B.5 and C.5 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)
- k. I agree with the risk assessment set out in Appendix 1 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.
- 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; wet season management plans, weed management plans, bushfire management plans, wastewater management plans, rehabilitation management plans, erosion and sediment control plan, and spill management plan. 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.
- m. The anticipated environmental impacts are appropriately identified in sections A.7.2 to A.7.10 for OL3, sections B.7.2 to B.7.10 for L7 and sections C.7.2 to C.7.10 for L6 of the EMP. The regulated activity is 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.
- n. The EMP demonstrates 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 that meets Regulation 7 and Schedule 1, Clause 9 of the Regulations (Sections A.6, B.6 and C.6 and Appendix 2). Stakeholder engagement records (Appendix 2) demonstrate that stakeholders did not raise objections about environmental impacts of the proposed activity that required specific changes from the interest holder. 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. 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.
- q. There are no environmental impacts or environmental risks relating to the proposed regulated activity that I consider to be unacceptable.
- r. 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.