

Approval notice and statement of reasons

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

Interest holder	Frontier Oil and Gas Pty Ltd ACN 103 194 136
Petroleum interest(s)	Exploration Permit 115 (EP115)
Environment management plan (EMP) title	Zevon Seismic Test Line
EMP document reference	FOG1-4, prepared by Frontier Oil and Gas dated 14 September 2023
Regulated activity	<ul style="list-style-type: none"> • Conduct two dimensional (2D) seismic activities along a 30.4 km seismic line. • Up to 150 km of stub lines associated with seismic activities (38 stub lines which are up to 4 km in length). • Development of a new access track approximately 0.5 km in length. • Land clearing of 12.4 ha for the seismic line and new access track. • Operation of 1 temporary camp (if required).
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 Aboriginal Sacred Sites Act 1989 been issued for the regulated activity?	Yes Authority Certificate C2022/043
Date an EMP compliant with reg 8 was first submitted under reg 6	22 June 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	21 August 2023 (requested) 29 August 2023 (submitted) 11 September 2023 (requested) 14 September 2023 (submitted)
Date of resubmission notice under reg 11(2)(b), if applicable	28 August 2023 (requested) 5 September (submitted)
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	21 September 2023

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.

Proposed timetable given in notice under reg 11(2A), or reg 11(3)(c), if applicable	12 October 2023
Where provided under s29B of the Northern Territory Environment Protection Authority Act 2012 (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: 5 October 2023

Date of decision 10 / 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 under reg 11(3)(a)(i).
2. The approval is subject to the following conditions:

Reporting Conditions

Condition 1: Within 30 days of completing seismic activities (being seismic line preparation, seismic survey and rehabilitation of seismic lines) or any other land clearing, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au geospatial files, inclusive of seismic lines, stub lines, and any buffers applied in association with Indigenous Protected Areas, Restricted Work Areas and Exclusion Zones (as shapefiles consisting of polygons, not line data and inclusive of metadata).

Condition 2: By 1 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a completed Annual Environmental 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 3: 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.

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Condition 4: During seismic activities or any other land clearing undertaken during the Wet Season (as defined in the Code), the interest holder must submit to Onshoregas.DEPWS@nt.gov.au weekly reports with the following information:

- a) measures implemented to avoid impacts to stream beds or banks;
- b) daily inspection reports of erosion and sediment control measures 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
- c) 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 5: The interest holder must submit the weekly reports required by condition 4, by 5pm ACST each Monday for the preceding week or part thereof.

Condition 6: Within 30 days of completing seismic activities or any other land clearing, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a report on the findings of the pre-commencement activities inclusive of:

- a) geospatial data, showing the location of Marble Gum and Desert Oak in the path of the proposed seismic line and stub lines (as shapefiles consisting of point data and inclusive of metadata);
- b) geospatial data, showing the survey lines followed by the pre-commencement surveys (as shapefiles consisting of line data and inclusive of metadata);
- c) all instances of the presence and/or nesting or breeding activity of Grey Falcon (*Falco hypoleucos*) and Princess Parrot (*Polytelis alexandrae*);
- d) where present, geospatial files indicating how the activity was modified and/or a 300 m buffer was applied to avoid disturbance of Grey Falcon and/or Princess Parrot (as shapefiles consisting of polygon and point data inclusive of metadata).
- e) geospatial files indicating the location of streams that will be intersected by the regulated activity (as shapefiles inclusive of metadata).

Greenhouse Gas Emissions Condition

Condition 7: By 31 October annually, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au the emissions report required by clause D.6.2 of the Code⁴, 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 Energy Reporting Act 2007* (NGER Act) versus predicted emissions in the EMP (FOG1-4);
- c) 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;

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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- d) include a summary of all regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and
- e) 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 Conditions

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.

Condition 9: The interest holder must disregard the Spill Tier Levels and Spill Level Table in the Spill Management Plan on page 87 of the EMP (FOG1-4) to the extent it conflicts with obligations for making notifications against regulations 33, 34 and 35 of the Regulations.

Rehabilitation Conditions

Condition 10: Progressive rehabilitation must commence no later than 12 months following cessation of seismic data acquisition at each location ground disturbance has occurred during conduct of the regulated activity.

Condition 11: Within 90 days of the anniversary of the approval of the EMP (FOG1-4), and thereafter annually, the interest holder must provide a rehabilitation report which:

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

2 Material considered

1. The following material has been taken into account in making this decision:
 - a. Zevon Seismic Test Line EMP, 14 September 2023 (FOG1-4).
 - 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 Authority Certificate issued under the *Northern Territory Aboriginal Sacred Sites Act 1989*.
 - e. The Code of Practice: Onshore Petroleum Activities in the Northern Territory (Code) as an approved code of practice under reg 10(2).
 - f. The estimation of environmental security required for the regulated activity.

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. Two dimensional (2D) seismic activities along a 30.4 km seismic line.
 - ii. Up to 150 km of stub lines associated with seismic activities (38 stub lines which are 4 km in length) (no vegetation clearance is required for this component).
 - iii. Development of a new access track approximately 0.5 km in length.
 - iv. 12.4 ha of land clearing for the seismic line and new access track.
 - v. Operation of one temporary camp (if required).
 - vi. Rehabilitation of the seismic line back to its original land use.
 - b. The scale of the regulated activity is as follows:
 - i. The total area of surface disturbance is 12.4 ha.
 - ii. Peak traffic movements for the regulated activity is 13 vehicles per day.
 - iii. The line preparation, seismic exploration and decommissioning is anticipated to take 27 days.
 - iv. A workforce of up to 30 personnel.
 - v. The predicted upper limit of emissions is predicted to be approximately 138 tCO₂-e (total) this accounts for all components of the regulated activity.
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 reg 9(1)(c)

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 (s18 *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. It is anticipated that 27 days is required for the line preparation, seismic exploration and decommissioning plus annual rehabilitation monitoring. The regulated activity forms one component of a broader onshore petroleum exploration program in the region. The regulated activity will inform decision-making about longer-term petroleum activities.
 - ii. Public consultation on the EMP was not required under the Petroleum (Environment) Regulations 2016, as the EMP does not propose drilling or hydraulic fracturing activities. 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 negligible if the regulated activity is undertaken in the manner detailed in the EMP in addition to the conditions of approval.
 - 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 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 consultants and reviewed by the interest holder'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, stakeholder engagement in order to support the development of the EMP.
 - 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 areas requiring clarification. These included threatened species and habitat; the scope of the EMP; spill management; consideration of all cultural heritage, Indigenous Protected Areas; traffic and surface water.
 - v. No concerns regarding the sufficiency of information to support the modified EMP are apparent. I am satisfied the information before me is comprehensive and appropriate noting the scale and scope of the regulated activity.
 - 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 benefit for future generations from increased economic activity in the region and am satisfied that exploration is necessary precursor for future economic gains that may be achieved through a viable onshore petroleum industry.
 - 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. I conclude that on balance, the health, diversity and productivity of the environment is not reduced by the regulated activity.
 - 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 2020-2021 NT and Australian emissions, which were approximately 14.1 million tonnes and 465 million tonnes respectively.
 - 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 cultural heritage values protected through measures for reporting on discovery of archaeological sites during civil maintenance activities. The EMP identifies

that the interest holder contacted the NT Heritage Branch regarding culturally significant sites. The EMP states that no known sites are located in proximity to the proposed seismic line.

- 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. 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. The anticipated water use for the regulated activity is 4,800 litres per day for camps and vehicle wash down related to weed management. Based on the anticipated daily water use and duration of the regulated activity approximately 0.13 ML of water is required. This water will be purchased commercially from Alice Springs
 - 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. An assessment of the likely presence of threatened species under the EPBC Act and/or the *Territory Parks and Wildlife Conservation Act 1976* (TPWC Act) was undertaken. The EMP identifies eight listed fauna species listed under the EPBC Act and/or the TPWC Act. Of the species identified the Grey Falcon (*Falco hypoleucos*) and Princess Parrot (*Polytelis alexandrae*) had the highest likelihood of occurring.
 - iii. The mitigation measures identified in the EMP are adequate to reduce risks associated with the potential impacts on biodiversity, such as land clearing, vehicle strike, weed infestation and inappropriate fire regimes to be as low as reasonably practicable.
 - iv. The EMP outlines measures to minimise impacts on affected environmental values, including the management of threatening processes such as weeds and fire. Where relevant, management measures for threatening processes

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>

are consistent with the requirements of the Code, NT Land Clearing Guidelines and Weed Management Planning Guideline: Onshore Petroleum Projects. Specific examples of mitigation measures include undertaking pre-commencement surveys, selective clearing to avoid clearing important habitat trees and minimise clearance of other trees, weed certifications and 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).
- 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: emissions; liquid waste (e.g. sewage and greywater); solid waste and hazardous waste (e.g. batteries, spill contaminated materials, domestic waste).
 - ii. I am satisfied that waste will be disposed of by the interest holder in accordance with the requirements *Public and Environmental Health Act 2011* and the *Waste Management and Pollution Control Act 1998* at its own cost as set out in Table 2 and section 3.7 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. This includes:
 - (1) Impacts and risks associated with contamination of soil, surface water and groundwater, which are managed through the requirements for the containment of contaminants and mandatory requirements for management plans for spills as defined in the Code of Practice.
 - iv. In relation to full life cycle costs, it is expected that the regulated activity will have a life cycle of less than 30 days, and at the end of this cycle the interest

holder will take action to remove all equipment, machinery and waste material 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 and incident management conditions 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.
- 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 11 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 section 4 and Appendix 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; a weather management plan (Section 6.1/Table 21); weed management plan (Section 6.3/Table 23); bushfire management plan (Section 6.4/Table 24); rehabilitation management plan (Section 6.5/Table 25); emergency response plan (Appendix 2); stakeholder engagement management (Section 4.6); and spill management plan (Section 6.6/Table 26). The EMP also includes the required elements for the ongoing management of erosion and sediments. 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 section 5 and Appendix 1 of the EMP. 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 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.
- o. I am satisfied that the interest holder has conducted and will conduct ongoing stakeholder engagement in accordance with the Regulations. The EMP provides details of stakeholder engagement that meets reg 7 and Schedule 1, item 9 of the Regulations (Section 4.6, Appendix 2 and Appendix 3). Stakeholder engagement records (Appendix 3) 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 how written feedback and input from stakeholders as part future stakeholder engagement will be managed. 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.