

Approval notice and statement of reasons

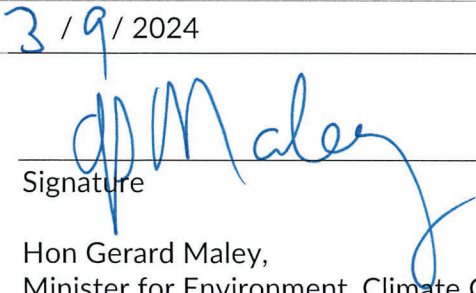
Petroleum (Environment) Regulations 2016 (NT) (Regulations)

Interest holder	Santos QNT Pty Ltd ABN 33 083 077 196
Petroleum interest(s)	Exploration Permit 161 (EP161)
Environment management plan (EMP) title	EP161 2D Seismic and Ground Gravity Survey Program
EMP document reference	STO7-4, prepared by inGauge Energy Australia dated 6 August 2024
Regulated activity	<ul style="list-style-type: none"> • Mobilisation and establishment of a temporary camp, including an equipment parking and fuelling area. • Maintenance and monitoring of pre-existing access tracks. • Where necessary, line preparation of 5 m wide seismic lines and any required connection lines between seismic lines with a mulcher. • Conducting a 2D seismic and ground gravity survey • Demobilisation of temporary camp and monitoring of rehabilitation of seismic and connection lines prepared under this EMP that are not along pre-existing tracks.
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 C2020/011 C2019/043 variation to C2014/053 C2018/105 variation to C2018/102 C2013/142
Date an EMP compliant with reg 8 was first submitted under reg 6	12 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	9 February 2024 (requested) 8 April 2024 (submitted)
Date of resubmission notice under reg 11(2)(b), if applicable	9 February 2024 (requested) 8 April 2024 (received)

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.

Date EMP was resubmitted under reg 11(3), if applicable	2 May 2024 (requested) 13 June 2024 (received) 4 July 2024 (requested) 6 August 2024 (received)
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: 27 August 2024 NTEPA2023/0162-006~0001
Date of decision	3 / 9 / 2024
Decision maker	
	Signature Hon Gerard Maley, Minister for Environment, Climate Change and Water Security

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

Condition 1: The interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification if seismic activities (being seismic line preparation, seismic survey and rehabilitation of seismic lines) and civil works (being all ground disturbing activities, including earth moving, land clearing and establishment of access tracks) are proposed to be conducted during the upcoming Wet Season (as defined in the *Code of Practice: Onshore Petroleum Activities in the Northern Territory* (2019) (the Code)). The notification must be made at least 1 week prior to activities occurring. The notification must include:

- the location of the proposed seismic activities or civil works; and
- the proposed timeframe for conducting the activities.

Condition 2: Within 24 hours of commencing or completing seismic and civil activity programs, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a notification that the activities have commenced or ceased, including the date the activities commenced and/or ceased and the location of the activities.

Condition 3: By 1 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au a completed Annual Environmental Performance Report Template (AEPR) for the preceding 12-month period of 1 July to 30 June. The AEPR Template must be completed in accordance with the Onshore Petroleum Annual Environmental Performance Reporting Guideline (21 December 2023).

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Condition 4: Within five 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:

- i. regulated activities completed in the previous quarter;
- ii. regulated activities to be conducted in the next quarter, including estimated duration;
- iii. the date any conditions of this approval were completed in the previous quarter;
- iv. the date any conditions of this approval are due for completion in the next quarter; and
- v. 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: While regulated activities occur 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:

- i. whether unsealed access roads were used by any vehicle or machinery, other than a light vehicle;
- 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.

Condition 6: The interest holder must submit the weekly reports required by conditions 5, by 5 pm ACST each Monday for the preceding week or part thereof.

Condition 7: The interest holder must submit recordable incident reports to Onshoregas.DEPWS@nt.gov.au no later 5 pm ACST 15 days after the end of each quarter, being 15 April, 15 July, 15 October and 15 January each year while the approved plan remains in force, and must be submitted regardless of whether an incident occurred during the reporting period or not.

Condition 8: Within 30 days of completing the seismic program, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au geospatial files of the seismic lines or other ground disturbing activities (including earth moving, land clearing and establishment of access tracks) and identify the areas which required mulching, required slashing, or did not require slashing or mulching (as shapefiles and inclusive of metadata).

Condition 9: By 31 October of each year, the interest holder must submit to Onshoregas.DEPWS@nt.gov.au the emissions report required by clause D.6.2 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 (STO7-4);

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- iii. include a summary of all regulated activities conducted under this EMP 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.

FOOTNOTE 1: 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.

Condition 10: 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.

Condition 11: Within 90 days of the anniversary of the approval of the EMP (STO7-4), and thereafter annually, the interest holder must provide a rehabilitation report which:

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

2 Material considered

1. The following material has been taken into account in making this decision:
 - a. EP161 2D Seismic and Ground Gravity Survey Program Environment Management Plan, 6 August 2024 (STO7-4).
 - 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 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.
 - 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. Mobilisation and establishment of a temporary camp, including an equipment parking and fuelling area.
 - ii. Maintenance and monitoring of pre-existing access tracks.
 - iii. Where necessary, line preparation of 5 m wide seismic lines and any required connection lines between seismic lines with a mulcher.
 - iv. Conducting a 2D seismic and ground gravity survey
 - v. Demobilisation of temporary camp and monitoring of rehabilitation of seismic and connection lines prepared under this EMP that are not along pre-existing tracks.
 - b. The scale of the regulated activity is as follows:
 - i. A total surface disturbance of 125 ha.
 - ii. An estimated groundwater usage of 5 ML.
 - iii. A peak traffic movements of 44 vehicles consisting of approximately 40% heavy vehicles.
 - iv. A workforce of up to 46 personnel.
 - v. A predicted upper limit of emissions being 7,100 tCO₂^e (total). This accounts for all components of this 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 reg 9(1)(c)

sustainable development. In accordance with reg 12(3), I provide the following information about how the EMP meets the approval criteria, and the manner in which I have taken into account the principles of ecologically sustainable development when considering whether or not the plan meets the approval criteria.

4. The principles of ecologically sustainable development are defined at section 18-24 of the *Environment Protection Act 2019*, and I address each in turn:
 - a. The decision-making principle (s 18 *Environment Protection Act 2019*) requires effective integration of long-term and short-term environmental and equitable considerations, and for processes to provide for community involvement in relation to decisions and actions that affect the community. Related to this, I note the following:
 - i. The regulated activity is low impact and of short duration 60 days plus rehabilitation and 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 and 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 and the conditions of approval.
 - v. The information before me suggests long-term environmental impacts are negligible if the regulated activity is undertaken in the manner detailed in the EMP and the conditions of approval.
 - 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
 - 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 has been developed with consideration of the findings in the Strategic Regional Environmental and Baseline Assessment (SREBA) for the Beetaloo Subbasin.

- ii. The EMP was developed by environmental consultants and reviewed by the interest holder's environmental specialist with experience in environmental engineering or management.
 - iii. The interest holder employed a comprehensive process to obtain relevant information including desktop studies, baseline assessments, archaeological assessments, and stakeholder engagement in order to support the development of the EMP.
 - iv. 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.
 - v. The interest holder has modified the EMP to address areas of uncertainty or clarification. These included environmental performance standards/measurement criteria, environmental impacts and risk, consideration of sacred sites, environmental control measures and protection of habitat.
 - vi. No concerns regarding the sufficiency of information to support the EMP are apparent. I am satisfied that the information before me is comprehensive.
 - vii. I believe the information regarding the proposed regulated activity adequately provides the best available evidence in the circumstances that is relevant and reliable to the evidence-based decision-making process.
- d. The principle of intergenerational and intra-generational equity (s 21 *Environment Protection Act 2019*) requires that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of present and future generations. I have given consideration to the impact on present and future generations as follows:
- i. This criterion requires me to turn my mind to whether the benefits of the proposal disproportionately burden present or future generations, or particular groups or communities of present or future generations.
 - ii. I have considered 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.
 - iii. 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.
 - 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.
 - v. The environmental burdens of the regulated activity will not disproportionately affect particular stakeholders.
 - vi. 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 432.6 million tonnes respectively.
 - 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.*”⁴
 - ii. I note the implementation of all the recommendations of the HFI, including establishment of the Policy Statement on Management of Greenhouse Gas Emissions from the Onshore Gas Industry. This Policy Statement commits to amendment of the NT legislative framework to require a Greenhouse Gas Abatement Plan for all applications for onshore gas production and complements the Australian Government’s reforms to the Safeguard Mechanism.
 - iii. The total anticipated water demand for this regulated activity is 5 ML which is approximately 2.6% of Santos QNT Pty Ltd’s annual maximum water entitlement of 193.5 ML per annum. Existing licensed groundwater bores will be used to meet the water requirements.
 - iv. No additional groundwater extraction licences are currently required for the regulated activity.
 - v. I note that the EMP has assessed the cumulative impacts of groundwater extraction from the Gum Ridge Formation and a groundwater extraction licence has been granted (GRF10280)
 - vi. Accordingly, I am satisfied that the concept of sustainable use of natural resources has been taken into account.
- f. The principle of biological diversity and ecological integrity (s 23 *Environment Protection Act 2019*) requires that biological diversity and ecological integrity should be conserved and maintained. I have applied this principle as follows:
- i. I believe the information I have regarding the existing biodiversity and ecosystems that are to be affected by the regulated activity; the effects that are likely; and the mitigation measures reasonably available, is sufficient.
 - ii. The regulated activity poses a low risk to the ecosystems within the Sturt Plateau bioregion and the Gulf Fall and Upland bioregion. Given the relatively small area of impact (approximately 125 ha) and the very large area of similar habitat within the region, the regulated activity does not pose a significant risk to any regional populations of threatened species.
 - iii. The Department of Environment, Parks and Water Security’s Flora and Fauna Division is satisfied that the regulated activity does not pose significant risk to threatened species, important habitats or significant vegetation types.

⁴ 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>

- iv. The mitigation measures identified in the EMP are adequate to reduce risks associated with potential impacts on biodiversity, such as noise, vehicles strike, dust, erosion and spills to be as low as reasonably practicable.
- v. The EMP outlines measures to minimise impacts on environmental values, including management of threatening processes such as weeds and fire. Where relevant management measures are consistent with the requirements of the Code, the NT Land Clearing Guidelines and Weed Management Planning Guideline: Onshore Petroleum Projects. Specific precautions to ensure interaction with wildlife is avoided are included in the EMP, including inspections for fauna presence, use of speed limits on access tracks and daily checks of infrastructure.
- 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 (e.g. fuel), liquid waste (e.g. sewage, greywater), solid waste and hazardous waste (e.g. batteries spill contaminated material, domestic waste).
 - ii. I am satisfied that this pollution and waste will be disposed of by the interest holder in accordance with the requirements of the *Public and Environmental Health Act 2011* and the *Waste Management and Pollution Control Act 1998* at their own cost as set out in Table 2.1 and section 7.5 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 requirements for the containment of contaminants and mandatory requirements for management plans for spills as defined in the Code state the risks and measures.

- iv. In relation to full life cycle costs, it is expected that the regulated activity will have a life cycle of 60 days, and at the end of this cycle the interest holder will take action to remove all equipment, machinery and waste as detailed by the EMP.
 - v. The interest holder is required to provide an environmental security calculated in accordance with the approved approach or methodology.
 - vi. With these measures are in place, I am satisfied that the EMP ensures that environmental costs are not left as externalities to be paid for by Territory taxpayers or the local community. They will be fairly paid for by those who stand to benefit from the regulated activity, such as the interest holder, and consumers who choose to purchase the interest holder's products. To the extent there are some costs to the Territory, I am satisfied that this is appropriate given the broader economic benefits.
 - vii. In relation to options to pursue environmental goals in relation to the regulated activity, I have taken into account that these goals should be pursued in the most cost-effective way.
 - 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 a number of 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 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 Table 6.1-1 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 weed management plan (section 7.2); fire management plan (section 7.3); rehabilitation management plan (section 7.4); waste and wastewater management plan (section 7.5); emergency contingency plan (section 7.6/appendix 5) and spill management plan (section 7.7). The EMP also includes the required elements for the management of erosion and sediments (section 7.1).
- m. The anticipated environmental impacts are appropriately identified in Table 6.1-1 of the EMP. The regulated activity are a continuation of current activities and cumulative effects have been identified and assessed. In EMPs for subsequent stages (if they proceed) the interest holder will need to continue to address cumulative effects.
- 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.
- 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 (Section 9 and Appendix 4). Stakeholder engagement records (Appendix 4) 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 written feedback and 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. 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.