

Approval notice and statement of reasons

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

Interest holder	Sweetpea Petroleum Pty Ltd ABN 42 074 750 879 (A wholly owned subsidiary of Tamboran Resources Limited)
Petroleum interest(s) Environment Management Plan (EMP) title	Exploration Permit 136 (EP136) Civil and Water Bore Environment Management Plan EP136 – Beetaloo Sub-Basin, NT
EMP document reference	Civil and Water Bore Environment Management Plan EP136 – Beetaloo Sub-Basin, NT, dated 16 December 2021 (SWP2-3)
Regulated activity	Civil construction works on EP136, which includes: <ul style="list-style-type: none"> • Land and vegetation clearing to allow construction of seven lease pads, access tracks, accommodation camp and gravel pits; • Use, maintenance and upgrade (where required) of the existing pastoral access tracks for purpose of access into the permit area; • Repurpose sections of seismic lines for access tracks to the lease pads; • Construction and operation of an accommodation camp to support personnel undertaking construction works and future operations; • Construction of seven (7) exploration lease pads, including drill pad and tank pad and access tracks to each exploration lease pad; • Installation of two groundwater monitoring bores; • Water extraction at the exploration lease pads for civil construction operations and on-going camp operations; and • Minor works ancillary to those mentioned above including routine ongoing monitoring and maintenance of infrastructure and or services.
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 EMP is a new plan submitted under reg 6. NTEPA2021/0011-007~0005

Was the regulated activity referred ¹ for consideration whether environmental impact assessment was required?	No
Was environmental impact assessment ² required?	N/A
Has an environmental approval ³ been issued for the regulated activity?	N/A
Has an Authority Certificate under the Northern Territory <i>Aboriginal Sacred Sites Act 1989</i> been issued for the regulated activity?	Yes Authority Certificate C2020/072
Date an EMP compliant with reg 8 was first submitted under reg 6	17 March 2021
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	08 April 2021 required 22 April 2021 submitted NTEPA2021/0011/011~0005
Date of resubmission notice under reg 11(2)(b), if applicable	9 December 2021
Date EMP was resubmitted under reg 11(3), if applicable	16 December 2021
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: 21 June 2021
Date of decision	12 / 1 / 2022
Decision maker	



Signature

Hon Eva Dina Lawler MLA,
Minister for Environment

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

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

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

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

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Condition 1: The interest holder must submit to the Department of Environment, Parks and Water Security (the department), via the onshore petroleum email account, an updated timetable for the regulated activity described in the EMP on the last day of each quarter for each year the EMP remains in force, that identifies activities completed in the current quarter and:

- i. the date and duration of regulated activities proposed to be undertaken in the next quarter;
- ii. the date and duration of interest holder inspections, monitoring and rehabilitation activities in the next quarter;
- iii. due dates for satisfaction of Ministerial approval conditions in the next quarter; and
- iv. due dates for regulatory reporting in the next quarter.

Condition 2: The interest holder must provide an annual report to the department on its environmental performance, via the onshore petroleum email account, in accordance with item 11(1)(b) in schedule 1 of the Petroleum (Environment) Regulations 2016, noting:

- i. each report must align with the template and Onshore Petroleum Annual Environment Performance Reports Guideline prepared by the department for this purpose;
- ii. the first report must incorporate interest holder performance during the 12 month period from the date of the approval (the reporting period), and be provided within 90 days of the end of the reporting period;
- iii. a report must be provided each year until such time a notification is made to the Minister under regulation 14 that the activity is complete, or until the EMP is revised and re-approved; and
- iv. reports must accurately reflect outcomes of inspections, audits and regulatory compliance notices.

Condition 3: To support clause A.3.9 of the Code the interest holder must provide to the department via the onshore petroleum email account, an annual rehabilitation report 90 days after the anniversary of the approval date each year. The rehabilitation report must:

- i. analyse and compare rehabilitation progress against reference site(s) and the rehabilitation criteria described in Appendix F
- ii. be accompanied by geospatial files for areas under rehabilitation
- iii. include annual monitoring and corrective actions for rehabilitated areas until comparison with reference sites indicates defined success criteria are met.

Progressive rehabilitation must commence no later than 12 months following cessation of the regulated activity at each location cleared of vegetation.

Condition 4: For the avoidance of doubt, the interest holder must not undertake any regulated activity described in this EMP on land outside of EP136.

Condition 5: In support of clause D.6.2 of the Code, the interest holder must provide to the department by 30 September each year, via the onshore petroleum account, an emissions report for publication, which must:

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- i. compare predicted emissions in the EMP with actual emissions reported under the Commonwealth National Greenhouse and Energy Reporting Act 2007;
- ii. provide a summary of regulated activities conducted which have contributed to greenhouse gas emissions during the reporting period; and
- iii. explain any differences observed between actual and predicted emissions with reference to all parts of the regulated activity with potential to create greenhouse gas emissions.

Condition 6: The Code of Practice Section A.3.2 (Well pad site selection requirements) states that 'Interest holders must minimise the surface footprint of wells and the impact on landscape amenity'. In that regard, Sweetpea must conduct land clearing for lease pads sequentially, and as required, including in conjunction with the installation of monitoring bores associated with a lease pad.

2 Material considered

1. The following material has been taken into account in making this decision:
 - a. Civil and Water Bore Drilling EMP EP136, dated 16 December 2021 (SWP2-3).
 - 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 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 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 technical works program in EP136 includes civil construction and groundwater bore drilling activities commencing in March 2022 and continuing over a four year period until 2025.
 - ii. Repurpose sections of existing seismic lines (up to 41 km) off the main arterial tracks to the lease pads for access tracks
 - iii. Land and vegetation clearing (up to 145 ha) to allow construction of seven lease pads, access tracks and 10 gravel pits
 - iv. Installation of two groundwater monitoring bores
 - v. Extension of the regulated activity into neighbouring EPs and perpetual pastoral leases is subject to an Access Authority, managed by the Department of Industry, Tourism and Trade (DITT) in accordance with section 57A of the Petroleum Act 1984.

I have imposed a condition requiring that the interest holder may only undertake the regulated activity within the boundary of EP136.
 - b. The scale of the regulated activity is as follows:
 - i. The total footprint (and land clearing of native vegetation) for the activity across EP136 is between 168 and 175 ha (dependent on track options). The breakdown is seven exploration lease pads (78 ha), ten gravel pits (20 ha), one gravel pit access track (6.24 ha), and clearing for access tracks (between 64 and 70 ha).
 - ii. The breakdown of estimated water use is 317.5 ML of groundwater; and 1000 L of potable water per day for camp operation.
 - iii. Estimated diesel usage is 1322 kL.

- iv. Peak traffic movements for the regulated activity is 56 vehicles per day, particularly during bore works and camp establishment.
 - v. The interest holder has estimated greenhouse gas emissions of approximately 14,909 tonnes carbon dioxide equivalent (tCO₂-e), comprising approximately 13,437 tCO₂-e from land clearing and 3,729 tCO₂-e from diesel combustion.
 - vi. A progressive rehabilitation plan (Appendix F) has been developed for the activity, to minimise the risk of site erosion and return the disturbed land to the original conditions long term, in accordance with clause A.3.5 of the Code. Progressive rehabilitation of the main access tracks, laydown yards and drill pads will occur over the duration of the exploration program. Gravel pits will be rehabilitated within 12 months of completion of the exploration activities. Overall land clearing and subsequent rehabilitation efforts will be limited by using existing pastoral/access tracks, existing cleared areas, and repurposing seismic lines.
3. The approval criteria in reg 9(1)(c) requires that I be satisfied that the activity will be carried out in a manner by which the environmental impacts and environmental risks of the activity will be reduced to a level that is both: (i) as low as reasonably practicable; and (ii) acceptable. In assessing whether the EMP meets the approval criteria, I note that my decision is a prescribed decision (under reg 5A) for s 6A of the Act, and as such requires me to consider and apply the principles of ecologically sustainable development. In accordance with reg 12(3), I provide the following information about how the EMP meets the approval criteria, and the manner in which I have taken into account the principles of ecologically sustainable development when considering whether or not the plan meets the approval criteria. reg 9(1)(c)
4. The principles of ecologically sustainable development are defined at section 18-24 of the *Environment Protection Act 2019*, and I address each in turn:
- a. The decision-making principle (s 18 *Environment Protection Act 2019*) requires effective integration of long-term and short-term environmental and equitable considerations, and for processes to provide for community involvement in relation to decisions and actions that affect the community. Related to this, I note the following:
 - i. The regulated activity is low impact and 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. The EMP does not involve drilling and hydraulic fracturing; however the public was made aware that the EMP was under assessment via the department's website.
 - iii. Next, I have considered short-term and long-term environmental impacts of carrying out the regulated activity. Environmental impacts include direct and indirect effects on the physical, biological, economic, cultural and social aspects of the environment, and may include cumulative impacts or occur over time.
 - iv. The information before me suggests short-term environmental impacts are manageable with the proposed mitigations in place.
 - v. The information before me suggests long-term environmental impacts are unlikely with the requirements under the waste and spill management plans.
 - vi. There is no particular contest between economic, social and environmental considerations that require 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.

The interest holder has proposed wet season contingencies and controls to mitigate potential erosion and sediment impacts associated with runoff from disturbed areas, off-site wastewater release, or transport of chemicals and wastewater. These controls have been assessed by the NT Government agencies and deemed adequate.

- 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 satisfied that the best available evidence has been obtained because:
- i. The EMP was developed by an ecologist, archaeologist and environmental consultants with experience in the Beetaloo Sub-basin.
- ii. The interest holder employed a comprehensive process to obtain relevant information including baseline assessments, archaeological assessment, stakeholder engagement and consultation with relevant NT government agencies.
- iii. The EMP has undergone review and assessment by a multi-disciplinary team in the department and NT government agencies, which has informed my decision on the EMP.
- iv. The interest holder has amended 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, interested persons, 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 whether the health, diversity and productivity of the environment is maintained or enhanced for the benefit of each of these relevant groups.
 - iii. The environmental burdens of the regulated activity will not disproportionately affect particular stakeholders.
 - iv. The greenhouse gas (GHG) emissions from the activity is approximately 14,909 tCO₂ e, generated from land clearing and diesel combustion. This is approximately 0.07% of the 2019 NT estimated GHG emissions (21 million tCO₂-e).
 - v. I consider that cumulative emissions are not significant when considered in context of 2019 NT and Australian emissions, which were approximately 21 million tCO₂-e and 519 million tCO₂-e 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 measures for reporting on discovery of archaeological sites during civil maintenance activities.
 - vii. Accordingly I do not believe that the carrying out of the regulated activity in accordance with the EMP would have an effect contrary to the principle of inter or intra-generational equity.
- e. The principle of sustainable use (s 22 *Environment Protection Act 2019*) requires that natural resources should be used in a manner that is sustainable, prudent, rational, wise and appropriate. In applying this principle, I have considered the following:
- i. 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 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. I note that the EMP has assessed the cumulative impacts of future groundwater use over the four-year exploration program (318 ML). The Georgina Basin (which includes the Gum Ridge and Anthony Lagoon Formations) has a recharge rate of 60-177 GL/year, and an estimated storage capacity between 1,819,000 and 3,690,000 GL. Based on these data, the proposed extraction will be well within the annual recharge rate (and sustainable yield) of the Basin’s aquifers.
 - iv. No additional groundwater extraction licences are currently required for the regulated activity. Any future consideration of groundwater use will include an application for an extraction licence.

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>

- v. Accordingly, I am satisfied that the concept of sustainable use of natural resources has been taken into account.
- f. The principle of biological diversity and ecological integrity (s 23 *Environment Protection Act 2019*) requires that biological diversity and ecological integrity should be conserved and maintained. I have applied this principle as follows:
- i. I believe the information I have regarding the existing biodiversity and ecosystems that are to be affected by the regulated activity; the effects that are likely; and the mitigation measures reasonably available, is sufficient.
 - ii. The Land Condition Assessment (Appendix C) has been informed by two separate field surveys in November 2019 and May 2020 (Appendix C). These surveys are supplemented by field assessments, detailed desktop analysis and anecdotal evidence.
 - iii. No threatened vegetation communities were listed or likely to occur within the area of the activity.
 - iv. Several areas of conservation significance occur within the vicinity of the proposed civil and water bore project area. The closest is Bullwaddy Conservation Reserve: located 20 km to the west. The other area of conservation significance is Lake Woods: approximately 140 km south-west of the permit area.
 - v. The EMP identifies 21 fauna species listed as threatened under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) and/or the *Territory Parks and Wildlife Conservation Act 1976* (TPWC Act). An assessment of the likelihood of occurrence indicates five listed threatened species that are likely to occur based on habitat suitability and previous records. These include the Gouldian Finch *Erythrura gouldiae* (Endangered EPBC Act, Vulnerable TPWC Act); Grey Falcon *Falco hypoleucos* (Vulnerable TPWC Act); Crested Shrike-tit (northern) *Falcunculus frontatus whitei* (Vulnerable EPBC Act, Near Threatened TPWC Act); Painted Honey Eater *Grantiella picta* (Vulnerable EPBC Act, Vulnerable TPWC Act); and Yellow-spotted Monitor *Varanus panoptes* (Vulnerable TPWC Act).
 - vi. The EMP also identifies an additional 20 migratory and marine bird species either likely (four), possible (10) or unlikely (six) occurring in the area.
 - vii. The department's Flora and Fauna Division is satisfied that the regulated activity does not pose a significant risk to threatened species, important habitats or significant vegetation types. Mitigation controls identified in the EMP are adequate to reduce risks associated with vehicle strike, dust, erosion and/or spills to as low as reasonably practicable, in relation to potential impacts on biodiversity. This includes clearing for the activity avoiding riparian vegetation and additional disturbance to watercourses, and avoiding larger trees with trunk diameters greater than 25 cm at 1.3 m above the ground to minimise disturbance to potential nesting trees. Further, the interest holder has committed to providing geospatial files of surface disturbance to the department before, during and after construction activities and then at intervals of 6 months, 1 year and 2 years until rehabilitation is determined successful and complete.
 - viii. 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 the threatening process are consistent with the requirements of the Code, NT Land Clearing Guidelines and Weed Management Planning Guideline: Onshore Petroleum

Projects. Specific examples of mitigation controls include training for all personal on the use of protective equipment and bushfire awareness; daily inspections of all machinery and vehicles for any trapped vegetation that may cause a spark or ignite a fire; visual inspection and dry removal of debris; six-monthly weed inspections completed on all activity areas to reduce the spread of weeds; and ensuring that all equipment is cleaned and has valid weed hygiene declarations prior to accessing pastoral properties.

- ix. 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 have 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.
 - x. 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.
 - xi. 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 from camp operation, groundwater bore drilling waste and general industrial waste.
 - ii. I am satisfied that this pollution and waste will be disposed of by the interest holder at its own cost as set out in 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 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 have a life cycle of five years, 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. In addition, the interest holder is required to provide an environmental security sufficient to allow third party intervention for 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 any relevant 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. I believe approval of the EMP with the conditions I have imposed is consistent with the principle of improved valuation, pricing and incentive mechanisms.
- h. The NT EPA did not require the EMP to be referred under the *Environment Protection Act 2019*, as the regulated activity does not have the potential to cause a significant impact on the environment. reg 9(3)
 - i. The NT EPA reviewed the EMP for the regulated activity against the approval criteria in regulations 9(3)(a) and 9(3)(c) of the Regulations and other matters the NT EPA considered relevant, and has provided advice about the EMP.
 - i. The NT EPA has provided the following in relation to the regulated activity and the EMP:
 - i. In accordance with my request under s 29B of the NT EPA Act, the NT EPA reviewed the EMP against the approval criteria in regulation 9(1) of the Regulations and other matters the NT EPA considered relevant, and has provided advice about the EMP. Relevantly:
 - (1) The NT EPA recommended that should the EMP be approved, it be subject to six conditions. The NT EPA's recommendations have informed the conditions of this approval. All conditions are outlined in section 1 (2) of this Approval Notice.
 - (2) The NT EPA concluded that the EMP for the regulated activity, subject to the recommended approval conditions, is appropriate for the nature and scale of the regulated activity and demonstrates that the regulated activity can be carried out in a manner that environmental impacts and environmental risks of the activity will be reduced to a level that is as low as reasonably practical and acceptable.
 - ii. I have considered the NT EPA's advice and recommendations and these have been incorporated where relevant into this statement of reasons and the conditions in the Approval Notice.
- j. The existing environment along with its particular values and sensitivities is appropriately identified in section 4 and Appendix C 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 sections 6, 7 and Appendix E of the EMP, and to the extent I do not agree I have imposed a condition or conditions to address the relevant risk or risks.
- 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 (Appendix H); bushfire management plan (Appendix I); waste management plan (EMP section 7.5); rehabilitation management plan (Appendix

F); emergency response plan (Appendix M); stakeholder engagement (Appendix J), erosion and sediment control plan (Appendix K); and traffic impact statement. The EMP also includes the required elements for the ongoing management of erosion and sediments in accordance with the erosion and sediment control 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 section 6 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 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 ongoing stakeholder engagement in accordance with the Regulations. The EMP provides details of stakeholder engagement that meets Regulation 7 and Schedule 1, Clause 9 of the Regulations (Section 5 and Appendix J). Stakeholder engagement records (Appendix J) 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.