

## Submission on referral information

### Power and Water Corporation (NT) – Manton Dam Return to Service Project

This submission is made under regulation 53 of the Environment Protection Regulations 2020

NT EPA reference number: EP2023/032

Government authority: Aboriginal Areas Protection Authority (AAPA)

Section of referral or terms of reference	Theme / issue	Comment
<p>Main report 2.2 Pg 10-11 2.3.1 Pg 12-13 Drawing B22-1982 (Figure 2-5?) Pg 14 Figure 2-7 Pg 16</p>	<p>Activities and subject land</p>	<p>There are proposed works and uses of land that are not covered by any Authority Certificate. This means that potential impacts to Aboriginal sacred sites have not been assessed in relation to those activities. This includes:</p> <ul style="list-style-type: none"> <li>• The Strauss WTP works area is larger than the subject land for the relevant activities in Authority Certificates C2023/044 and C2017/060 in the Cox Peninsula Road area.</li> <li>• The installation of a fibre optic cable alongside the water pipeline is not included as an activity in Authority Certificate C2023/044.</li> <li>• Upgrades to the existing inlet tower and stilling pond are not activities in Authority Certificates C2023/044 and C2013/043.</li> <li>• Part of the stilling pond area is outside the subject land in Authority Certificate C2013/043.</li> <li>• Some of the structures to be demolished are outside the subject land of Authority Certificate C2023/044.</li> </ul> <p>We recommend that the proponent contact AAPA regarding the potential need for an additional Authority Certificate.</p>
<p>Main report Table 5.2 Pg 45 5.3.2 Pg 62 5.3.3 Pg 64 5.3.4 Pg 64 5.4.3 Pg 67</p>	<p>Maintenance of pre-development flows in Manton River</p>	<ul style="list-style-type: none"> <li>• There are sacred sites along the Manton River that could be impacted by a change in flow regime.</li> <li>• A change in flow regime is not an activity that is contemplated by the proponent's Authority Certificates.</li> <li>• As these sites are not within an Authority Certificate there are no specific conditions regarding these sacred sites. However it is still an offence to damage these sacred sites.</li> <li>• The maintenance of pre-development flows in the Manton River should mitigate the risks to these known sites, and potentially unknown sites along the river.</li> <li>• In the event of any future proposed changes to the flow regime the proponent should contact AAPA regarding an Authority Certificate.</li> </ul>
<p>Main report Table 5.10 Pg 71</p>	<p>Relevant Authority Certificates</p>	<ul style="list-style-type: none"> <li>• States that Authority Certificate C2010/151 has been obtained as a mitigation measure for construction related impacts.</li> </ul>

Environmental impact assessment under the *Environment Protection Act 2019*

		<ul style="list-style-type: none"> <li>• Note that the pipeline corridor for Authority Certificate C2010/151 is not the alignment of the proposed corridor in this Referral.</li> <li>• Authority Certificate C2010/151 was varied to the pipeline corridor in this Referral in Authority Certificate C2023/044.</li> <li>• Relevant Authority Certificates for the works described in this Referral are C2023/044, C2017/060, and C2013/043.</li> </ul>
Main report Table 5.10 Pg 72-3	Potential impacts on Manton River and mitigation	<ul style="list-style-type: none"> <li>• A change in flow regime has not been added to the list of potential operational impacts.</li> <li>• The mitigation discussed in this Referral is the maintenance of pre-development flow rates through controlled discharges.</li> </ul>
Main report 5.6.1 Pg 76	Aboriginal heritage features	<ul style="list-style-type: none"> <li>• States that Authority Certificates have been obtained.</li> <li>• However, note that Authority Certificates relate to Aboriginal sacred sites only, and do not include other Aboriginal heritage or cultural values.</li> </ul>
Main report 5.6.3 Pg 80	Relevant Authority Certificates	<ul style="list-style-type: none"> <li>• States that Authority Certificate C2023/044 has been obtained.</li> <li>• Relevant Authority Certificates for the works described in this Referral are C2023/044, C2017/060, and C2013/043.</li> </ul>
Appendix H	Relevant Authority Certificates	<ul style="list-style-type: none"> <li>• This appendix contains Authority Certificate C2010/151. The subject land for this certificate does not include the pipeline corridor in this Referral.</li> <li>• Relevant Authority Certificates for the works described in this Referral are C2023/044, C2017/060, and C2013/043.</li> </ul>