

## Submission on referral information

### Equatorial Launch Australia Pty Ltd – Phase 2 Expansion of the Arnhem Space Centre

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

NT EPA reference number: EP2023/031

Government authority: Aboriginal Areas Protection Authority (AAPA)

Section of referral or terms of reference	Theme / issue	Comment
Main report Table 2 Pg 4	Name of the Act	<ul style="list-style-type: none"> <li>Note that Authority Certificates are issued under the <i>Northern Territory Aboriginal Sacred Sites Act 1989</i>.</li> </ul>
Main report 3.2.3.6 Pg 18 3.2.3.7  Table 11 Pg 31	Engagement with AAPA	<ul style="list-style-type: none"> <li>An application for an Authority Certificate has been received for the Arnhem Space Centre (ASC) site and activities. The drop zones and recovery are not included in the application area.</li> <li>Note AAPA is the “Aboriginal Areas Protection Authority”</li> </ul>
Main report Table 9 Pg 20 Figure 8	Drop Zone A	<ul style="list-style-type: none"> <li>Zone A covers the entire Northern Territory. The proponent should be required to define more discrete drop zones and investigate potential environmental and cultural impacts in those locations.</li> <li>Discrete drop zones should then form an activity and subject land in an Authority Certificate. Custodians may require specific protocols to enter a sacred site for recovery of rocket components.</li> </ul>
Main report 6.4.4 Pg 38  Reference 3 1.2 Pg 1 4.1.3 Pg 18 Reference 7 4.3.3 Pg 7 4.4.1 Pg 8	Groundwater extraction and impact	<ul style="list-style-type: none"> <li>The proponent intends to top up the dam with groundwater during the dry season as necessary.</li> <li>Volumes are not provided, and an assessment of groundwater flow, drawdown, and discharge area has not been made.</li> <li>Identifies soaks, seepages, swamps and springs but potential impact to water flow and ecology from groundwater extraction has not been assessed, and states further work is required.</li> <li>Currently it is not known whether groundwater dependent sacred sites are present in parts of the site area.</li> </ul>
Main report 6.5 Pg 38 6.6 Pg 39	Water quality and aquatic ecosystems	<ul style="list-style-type: none"> <li>Direct and cumulative impacts are described, but not indirect impacts.</li> <li>Section 6.2 determined that soils are thin to non-existent and have low carbon content and biological activity.</li> <li>Therefore chemical spills to land may leach to groundwater with little retardation or degradation, and</li> </ul>

Environmental impact assessment under the *Environment Protection Act 2019*

		<p>discharge to creeks affecting water quality and aquatic life.</p> <ul style="list-style-type: none"><li>• Currently it is not known whether sacred sites are present along the creeks in parts of the site area.</li></ul>
<p>Main report 6.13 Pg 44</p>	<p>Cultural impact</p>	<ul style="list-style-type: none"><li>• States that the ASC will have no direct or cumulative impacts on culture and heritage, but does not explain how this conclusion was determined.</li><li>• The information required for demonstrating avoidance / minimisation of impacts on Aboriginal sacred sites is:<ol style="list-style-type: none"><li>1) evidence of an Authority Certificate that covers the proposed works and use of land and sea, in accordance with the <i>Northern Territory Aboriginal Sacred Sites Act 1989</i>; and</li><li>2) a commitment to comply with the conditions of the Authority Certificate.</li></ol></li><li>• Obtaining and adhering to an Authority Certificate is the appropriate mechanism to avoid and mitigate impacts to Aboriginal sacred sites.</li></ul>