

Submission on Supplementary Environmental Report

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

This submission is made under regulation 123 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
<p>Executive Summary Pg 6</p> <p>Main report Table 7 Pg 44</p> <p>Appendix 3 Table 1 Pg 10</p> <p>Appendix 3 Annex C Pg 18, 21</p>	AAPA name	<ul style="list-style-type: none"> • Please correct references to AAPA such as the ‘Aboriginal Areas Protection Agency’ and ‘Aboriginal Authority Protection Agency’. • AAPA is the “Aboriginal Areas Protection Authority”.
<p>Executive Summary Pg 6</p> <p>Main report 7.4.1.3 & Table 7 Pg 44</p> <p>7.5.1 Pg 46</p> <p>Appendix 1 5 Pg 6</p> <p>7.2 Pg 9</p> <p>Appendix 8 2.3 Pg 2 2.4</p>	Entry to Aboriginal sacred sites for equipment recovery	<ul style="list-style-type: none"> • The proponent’s current Authority Certificate application does not include launch recovery areas. • The proponent acknowledges that an Authority Certificate will be required for recovery stating that protocols ‘...includes obtaining required AAPA Certificates for the recovery area’. • The report states that: ‘The actual trajectory and potential recovery area of first stage rockets launched from the ASC are known about 9 months before a launch.’ • The proponent states that they will apply for an Authority Certificate if recovery is on land within the Northern Territory. • Note that an Authority Certificate’s subject land should also include NT waters where relevant. • If the recovery area is calculated to be within NT land or waters, we recommend applying for an Authority Certificate. An Authority Certificate application should be made at the earliest opportunity, to allow sufficient time for the processes under the Sacred Sites Act to occur, including consultations with Aboriginal custodians.

Pg 3		
Main report 7.2.1 Pg 33	Potential groundwater drawdown	<ul style="list-style-type: none"> • The report states that the proponent would seek a groundwater extraction licence in future when the Arnhem Space Centre (ASC) is at full operational capacity, and states that the potential radius and cone of depression (groundwater drawdown area) will be analysed. • If the groundwater drawdown area extends beyond the Authority Certificate subject land, then ASC should apply for a Variation to the Authority Certificate for the broader drawdown area. This will ensure that potential impacts to water dependent Aboriginal sacred sites areas are appropriately considered.
Main report 7.2.1 Pg 33 7.2.2 Pg 33	Presence of Aboriginal sacred sites	<ul style="list-style-type: none"> • The report states that '<i>there are no Aboriginal sacred sites located along ephemeral drainage areas within the ASC lease area</i>' and '<i>there are no creeks or sacred sites associated with creeks within the ASC lease area</i>'. • An Authority Certificate has not yet been issued. Therefore, the presence of Aboriginal sacred sites remains uncertain.