

Submission on draft terms of reference

Provaris Energy Ltd- Tiwi H2 Project

This submission is made under regulation 103 of the Environment Protection Regulations 2020

NT EPA reference number: EP 2022/017

Government authority: Aboriginal Areas Protection Authority

Section of terms of reference	Theme / issue	Comment
Section 2.4.6	Relevant activities	<p>The second bullet point is specific to siting infrastructure within Pirlangimpi borefield and may be interpreted by the Proponent that siting of infrastructure elsewhere does not need to be described.</p> <p>We recommend that this be edited to:</p> <ul style="list-style-type: none"> Siting of the proposal infrastructure within the proposal footprint including onshore, nearshore and offshore.
Section 2.4.6	Potential impacts and risks	<p>The Terms of Reference do not explicitly require the Environmental Impact Statement to include information on potential impacts and risks to Aboriginal sacred sites and Aboriginal cultural heritage.</p> <p>We recommend that this be included as an additional dot-point, such as:</p> <ul style="list-style-type: none"> 'Direct and indirect disturbance to traditional and/or contemporary Aboriginal cultural and heritage values, Aboriginal sacred sites, or uses of land (e.g. hunting and ceremonial use), due to construction, operation or maintenance activities'.
Section 2.4.6	Avoidance, mitigation and management	<p>There is limited information regarding requirements for avoidance, mitigation and management of Aboriginal sacred sites.</p> <p>The information required for demonstrating avoidance / minimisation of impacts on sacred sites is:</p> <ol style="list-style-type: none"> evidence of obtaining an Authority Certificate that covers the proposed works and use of land and sea, in accordance with the Northern Territory Aboriginal Sacred Sites Act 1989 a commitment to comply with the conditions of the Authority Certificate. <p>Obtaining and adhering to an Authority Certificate is the appropriate mechanism to avoid and mitigate impacts to sacred sites.</p>