

Submission on the referral

Imperial Oil & Gas Pty Ltd – Carpentaria Pilot Project

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

Government authority: Aboriginal Areas Protection Authority (AAPA)

Section of Referral	Theme or issue	Comment
Main report 6.2.3.1 Pg 63 6.5.2 Pg 130	Site selection Anthropological surveys	<ul style="list-style-type: none"> Section 6.2.3.1 states that anthropological surveys have been undertaken with <i>'Traditional Owner representatives, Anthropologist...'</i> Section 6.5.2 states: <i>'These surveys, conducted with Senior Traditional Owners as Cultural Advisors, have significantly expanded understanding of the Area's ancestral resources, sacred sites, and other features.'</i> Note that an Authority Certificate is yet to be issued and Aboriginal sacred sites have not yet been identified to the proponent. Site selection must take into account the location of Aboriginal sacred sites and any restricted work areas (RWAs) identified in an Authority Certificate issued by AAPA.
Main report 6.3.6 Pg 121	Groundwater monitoring locations	<ul style="list-style-type: none"> Section 6.3.6 states that groundwater monitoring will be undertaken at <i>'down-gradient production/monitoring bores at all well pads'</i>. Note that an Authority Certificate is yet to be issued and Aboriginal sacred sites have not yet been identified to the proponent. If the Authority Certificate identifies Aboriginal sacred sites that are surface waters including waterholes, springs, and soaks; then additional groundwater monitoring may be required if the existing monitoring network is not suitable to monitor for impacts in these areas.
Main report Table 7.1-2 Pg 137	Risk ranking	<ul style="list-style-type: none"> The risk ranking for Culture and Heritage is uncertain because a new Authority Certificate has yet to be issued. The risk ranking should be updated as appropriate in accordance with the Authority Certificate.
Appendix 4 Table 2 Pg 6 Table 6 Pg 11	Weed surveys	<ul style="list-style-type: none"> The table states <i>'Conduct post-wet season weed surveys to determine whether any weed introductions have occurred'</i>. Locations for monitoring given in Table 6 should include near the boundary of RWAs to ensure weeds do not infest sacred sites.

Environmental impact assessment under *the Environment Protection Act 2019*

Appendix 5 8 Pg 11	Erosion monitoring	<ul style="list-style-type: none">• The locations for erosion monitoring described are the sites of erosion control measures, such as drains.• If works are in the vicinity of Aboriginal sacred sites, then erosion surveys should include near the boundary of RWAs to ensure the landform of sacred sites is maintained.
Appendix 7 7.3 Pg 23	Spill monitoring	<ul style="list-style-type: none">• Section 7.3 describes monitoring of infrastructure to identify leaks and spills. If infrastructure such as flowlines are passing the vicinity of Aboriginal sacred sites or RWAs then the flowline or other infrastructure should have monitoring sensors in these areas.