

Submission on the referral

Department of Defence – HMAS Coonawarra Dredging and Dredged Materials Management

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

Government authority: Aboriginal Areas Protection Authority (the Authority)

Section of Referral	Theme or issue	Comment
Main report – section 7.11.1	Sacred sites	<p>Section 7.11.1 of the Referral report acknowledges the ‘Gundul sacred site’ located in the Larrakeyah Barracks Precinct at Emery Point and states that the sites is not within the project area and will not be disturbed by the proposed activities addressed in the referral.</p> <p>Figures 4.1 and 4.2 in the Referral report show the proposed dredge areas and proposed dredged material discharge location. The Authority confirms that the dredge areas and discharge location are at least 450m distant from the nearest sacred site (Kulndal; site 5073-2).</p> <p>The Authority has also reviewed the proposed locations for monitoring activities associated with the proposal. Section 10.4.2 states the proposed monitoring locations are shown in Figure 7.1, but these in fact appear to be shown in Figure 7.12. Section 10.4.2 also states that monitoring will occur at sites shown in Figure 10.30. The Authority has manually compared the monitoring locations shown in Figures 7.12 and 10.30 with the Authority’s records of sacred sites. The Authority does not have records of any sacred sites within about 400m of each of the proposed monitoring locations indicated on these maps.</p> <p>The legal mechanism for protecting sacred sites from potential impacts from proposed developments is to obtain and comply with an Authority Certificate issued by the Authority in accordance with the <i>Northern Territory Aboriginal Sacred Sites Act 1989</i>. The Authority notes that the Department of Defence has previously obtained Authority Certificates for related works in this area but the Authority has not done an assessment to determine if all proposed works are covered by those certificates.</p>
	Culture and heritage factor	The Authority considers that it is unlikely that this proposal would have a significant impact on cultural values associated with sacred sites in the area.