

File: 2023/193

Ms Lisa Bradley
Director Environmental Assessment
Northern Territory Environment Protection Authority

Via email: Lisa.Bradley@nt.gov.au

Dear Ms Bradley

Re: Consultation on the draft guidance for marine dredging

We refer to your invitation to comment dated 11 September 2023 seeking feedback on the draft guidance for marine dredging.

We have noted that the new draft guidelines have excluded the previous references to the Northern Territory Aboriginal Sacred Sites Act 1989, the Aboriginal Areas Protection Authority, Aboriginal sacred sites, and Authority Certificates. It is not clear why it is proposed to exclude these references.

There are many Aboriginal sacred sites that exist in the sea, in harbours, bays, rivers and other waterways in the Northern Territory. Almost one third of Aboriginal sacred sites known to the Authority are water related (approximately 5,000 sites). Protection of these sites and associated values are paramount to protecting Aboriginal culture and is mandated by the Northern Territory Aboriginal Sacred Sites Act 1989.

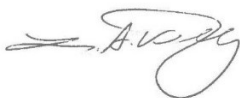
Please also note that it is unlawful to undertake works within an Aboriginal sacred site without an Authority Certificate issued by the Aboriginal Areas Protection Authority.

Dredging and disposal activities are high impact activities that have the potential to significantly damage Aboriginal sacred sites. Accordingly, we recommend the inclusion of the following text at Section 3.1 (page 9) under 'further statutory authorisations that may be needed':

- Northern Territory Aboriginal Sacred Sites Act 1989 – Aboriginal sacred sites exist on land and in the seas and waterways of the Northern Territory. Identification of Aboriginal sacred sites and approval for works on and in the vicinity of sacred sites is obtained through the Aboriginal Areas Protection Authority.

Please contact Travis Kelly on 8999 4347 should you wish to discuss.

Yours sincerely,



Travis Kelly
Assessment and Liaison Officer

Darwin 19 October 2023
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