1. Introduction

1.1 Purpose of this Document

The purpose of this Supplement Document is to respond to submissions made by the general public, Non Government Organisations, Northern Land Council (NLC), Northern Territory Government and the Commonwealth Department of Environment and Heritage (DEH) on the Draft Environmental Impact Statement (EIS) for the Blacktip Project. This Draft EIS was submitted by Woodside Energy Limited, as Operator of the Blacktip Project to the Federal and NT Governments on 1 November 2004. At the same time the Draft EIS entered an eleven week statutory public review period from 2 November 2004 until the 18th January 2005. Submissions made on the Draft EIS during this review period are addressed in this Supplement Document.

The preparation and submission of this Supplement Document also provides the opportunity to present project-related changes and clarifications which have occurred since the submission of the Draft EIS. Furthermore, the submission of this document to the non-statutory organisations that commented on the Draft EIS also provides these organisations with further information promoting greater familiarity with the project.

1.2 Structure of this Document

This document comprises one volume including appendices which present the formal submissions and relevant supporting studies as requested by both the NT Government and DEH. The document comprises the following main sections:

- Section 1 - Introduction, which details the purpose and structure of the document, assessment process and provides details on the submissions made.
- Section 2 - Presents a brief Erratum.
- Section 3 - Presents the response to the submissions.
- Section 4 – References.
- Section 5 – Glossary.
- Appendices A – Formal Submissions on the Draft EIS.
- Appendices B – Draft Traffic Management Plan.
- Appendices C – Draft Oil Spill Contingency Plan.
- Appendices D – Acid Sulfate Soils Investigation, Sinclair Knight Merz, February 2005.
- Appendix E – Biting Insect Survey and Assessment Supplementary Trapping, September 2004, NT Department of Health and Community Services.

1.3 Assessment Process

The Final EIS (which comprises both this Supplement Document and Draft EIS) will be jointly assessed by both the NT Government and Federal Government under the Northern Territory

Environmental Assessment Act 1982 and the *Environment Protection and Biodiversity Conservation 1999 Act* (EPBC Act).

On receipt of this Supplement Document both the NT Government and DEH will review the Final EIS and make recommendations to their respective ministers on granting approval to the project.

1.4 Number, Source and Summary of Submissions

Table 4 provides a full list of submissions received for which responses have been provided in the text of this document. The table includes a summary of the issues and comments raised as well as providing a cross-reference to the relevant sections both in the Draft EIS and in this Supplement Document. The vast majority of submissions were received from the NT Government (NTG), the Office of Environment and Heritage (OEH) and Northern Land Council (NLC). A submission was also received from the Northern Territory Police Commissioner's Office whose comments have been noted by the Proponent. One NGO submission was received from the Environment Centre NT (ECNT). No private submissions were received.

The comments made by the DEH are restricted to the adequacy of the information provided in the draft EIS and do not encompass DEH's overall assessment of the impacts of the project.

Throughout this Supplement Document the following abbreviations are used for those organisations that made submissions and which responses are provided in this document:

- DEH (Commonwealth Department of Environment and Heritage);
- OEH (Office of Environment and Heritage, Northern Territory Government);
- NTG (Northern Territory Government departments excluding OEH);
- ECNT (The Environment Centre, NT).

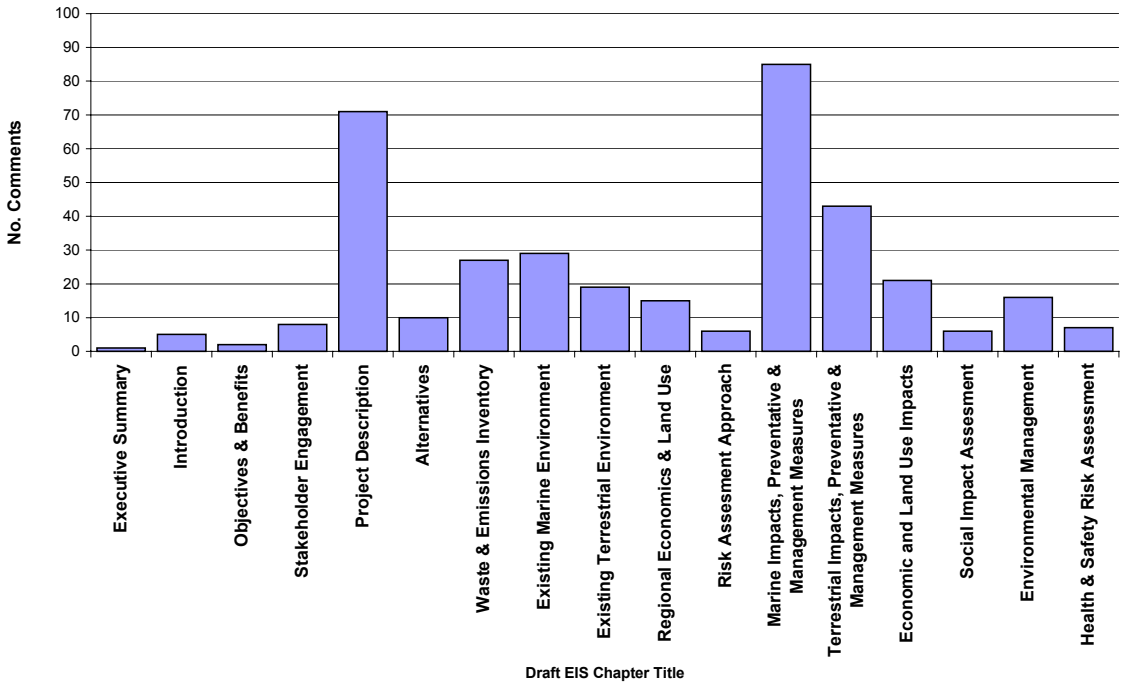
The submissions received spanned most sections of the Draft EIS. A large number of submissions related to the project details, the existing environment and impacts on the marine environment. Full copies of all the submissions received are included in **Appendix A** at the end of this report.

The main issues raised in the submissions can be summarised as follows:

- consultation process;
- information on decommissioning;
- impacts on marine environment;
- project details e.g. scale, Produced Water (PW) discharges, production chemicals;
- baseline environmental surveys and monitoring.

On behalf of the Blacktip Project Joint Venture, and as proponent of the project, Woodside would like to sincerely thank all those organisations that made submissions on the Draft EIS and for the considerable effort that has been made in preparing theses submissions. All submissions have been carefully reviewed and addressed to the highest level of detail possible. Continued comment on the

project by interested parties is welcomed and is seen as a key component of the ongoing consultation process.



- **Figure 1 Summary of Issues Raised on the Draft EIS**

1.5 Issues Raised Outside the Scope of the EIS

A number of comments were received on broad issues that the proponent believes to be outside the scope of the Draft EIS. Where comments relate to issues outside the scope of the Draft EIS, it has not always been possible to provide a detailed response. In these instances the reader is directed the relevant Government bodies who are better positioned to provide a more detailed and accurate response.

ECNT 1: The Environment Centre NT is the peak non-government conservation body in the Northern Territory. We have some major concerns about the Blacktip Project as laid out in the Environmental Impact Statement. First and foremost we consider it to be premature to approve this project on environmental grounds when the associated Trans-Territory Pipeline (TTP) project is currently going through a separate EIS process. There is an obvious need to step back and examine the cumulative impacts of the three related projects – Blacktip, TTP and the Alcan alumina refinery expansion at Gove. Indeed we note the following statement in the EIS that confirms the inter-relatedness of these projects: 'The Blacktip Project is linked to two other major proposed projects…Without the Blacktip Project, Alcan's proposed gasification of the refinery will be delayed…Should the Blacktip Project not proceed the TTP will not proceed and vice versa' (5.2. No Development Option, p136). None of the EIS's we have seen so far considers the cumulative impacts of the three projects. We therefore strongly recommend that approval for Blacktip is contingent upon a much broader strategic environmental review of the three related projects taking place.

Summary: This EIS is incomplete and inadequate. It does not provide a sound basis for any government approval of the project. It does, however, raise many serious questions about the impacts of gas-based industrialisation in the Northern Territory. ECNT therefore strongly recommends that, together with the TTP and the Alcan expansion, the Blacktip Project undergo a much higher level of strategic environmental assessment.

ECNT 1: Together with the TTP and the Alcan expansion, the Blacktip Project should undergo a much higher level of strategic environmental assessment.

The Proponent acknowledges the comment made by the ECNT with regards for the need for a much higher level of strategic environmental assessment. The implementation of strategic environmental assessment for major project in the Northern Territory would require government led changes to both the Commonwealth and NT environmental assessment processes.

NLC 1: Where the EIS suggests or advises anywhere that the traditional Aboriginal owners (the TOs) have approved of any impacts or proposed works on their land, please be advised that TOs have not approved of any use of land or works or impacts on the land. The TOs have over 2003-2004 approved survey works to take place to allow Woodside to gather information on the land to support environmental and project feasibility studies but no consent has been given for any part of the project on Aboriginal land to proceed. In addition, the TOs are currently in the process of being advised of the location of all of Blacktip's proposed land uses as it is only now, with the release of the draft Blacktip EIS that a clear and detailed description is available. Many of Woodside's land-use requirements were previously unknown to the NLC and traditional owners.

NLC 1: Be advised that TOs have not approved of any use of land or works or impacts on the land.

The Draft EIS does not suggest anywhere that traditional Aboriginal owners have approved the construction and operation of the development. Woodside is clearly aware of the interests that it seeks in the land and the development proposal and that of its relationship with the NLC and the *Aboriginal Land Rights (Northern Territory) Act 1976.*

NLC 2: The Project Schedule in **Figure 1-3** is frivolous, as it requires a FID made in April 2005 with all Government approvals in place. The EIS approval process time line is 4 months out of date (November submission of draft EIS, not June). There is substantial on ground consultation required with TOs concerning the project parameters and there are no statutory agreements yet in place between the NLC and Woodside for either this project or the closely associated Wadeye to Gove gas pipeline. Many of the milestones for Blacktip will likely need to coincide with those of the TTP project. It is unlikely that FID for Blacktip will occur separately to the approvals for the TTP project and therefore the schedule should also identify key TTP milestones such as the approval of the TTP EIS and issuing of the pipeline licence.

NLC 2: The Project Schedule in Figure 1-3 is frivolous.

The date for the Final Investment Decision (FID) is definitive and based on ensuring the timely delivery of gas to Gove to meet the requirements of Alcan's Gove Expansion and gasification. **Figure 1-3**, **Volume 1** of the Draft EIS is not incorrect and correctly shows the dates for 'EIS Submission' (and not the 'EIS approval process time line') as falling between June and December 2004. The EIS was submitted formally to the NT Government on 1 November 2004. The timelines associated with the approval of any EIS undertaken under the Northern Territory environmental assessment process is shown in **Figure 1-4** of the Draft EIS and should be referred to for further detail.

The TTP Draft EIS is currently being assessed under an entirely separate approval process. The TTP Draft EIS was formally submitted to Government on 2 December by the TTP Sponsors who are the designated proponents of this separate project and associated EIS.

NLC 22: The EIS is a document that appears to be written to beg the need for further supplementary data and delay before Government can approve the EIS. Woodside should be capable of producing a substantive document.

NLC 22: The EIS is a document that appears to be written to beg the need for further supplementary data and delay before Government can approve the EIS.

NLC 22: The EIS is written to beg the need for further supplementary data and delay before Government can approve the EIS.

The Proponent acknowledges the comments made by the NLC. Further information will be provided in the Supplement Document and in Environment Plans which will be prepared for each of the main activities to take place. The Proponent strongly believes that the Draft EIS provides an appropriate level of detail that allows government and broader stakeholders to make informed decisions on the likely impacts and mitigation measures associated with the Blacktip Project.

NLC 24: Page 12 Vol 1, Note that the NTG has not determined the procedures for administrating a gas plant under the Waste Management and Pollution Control Act 1998. The NTG is requested to advise the NLC of those procedures once they are developed as the NLC will seek to understand Government regulation of the site in relation to its own contractual involvement with the site.

NLC 24: The NTG has not determined the procedures for administrating a gas plant under the Waste Management and Pollution Control Act 1998.

The Proponent acknowledges this comment and advises that this is an issue between the NLC and the Northern Territory Government.

1.6 Legislation

Numerous standards as well as Acts, Ordinances and Regulations will apply to the Blacktip Project over its life-span relating to engineering, environmental and health and safety issues amongst others. The most pertinent have been quoted either in the main body of the Draft EIS (**Volume 1**) or are otherwise listed in **Appendix B** at the end of **Volume 1** of the Draft EIS.

A number of comments were received from the NTG and OEH with respect to legislation that should have been referenced in the Draft EIS or for which further explanatory notes were provided. These relate predominantly to health and safety aspects and also to 'other' environmental approvals that will be required, provided approval of the Final EIS. Accordingly, the legislation noted has been compiled in **Table 1** along with notes on its relevance to the Blacktip Project. This table supplements the information provided in **Section 1.8.1**, **1.8.2** and **1.9** of the Draft EIS and also details the relevant Australian or international standards. In the absence of international or Australian standards there are numerous Woodside or other operator standards that are used; these are considered far too numerous and detailed to list.

1.6.1 Section 1.8.1 Northern Territory Primary Legislation

NTG 1: Page 17 Under the Northern Territory *Heritage Conservation Act 1991*, the AAPA has delegations associated with burials and skeletal remains. The *Food Act 2004* is not cited here or in **Appendix A Volume 1**. This legislation is targeted at ensuring that food for sale is safe and suitable for human consumption and would apply to food supplied for consumption in the construction camp.

In addition there is no reference to the *Public Health Act* and associated regulations such as:

- Public Health (General sanitation, mosquito prevention, rat exclusion and prevention) Regulations;
- Public Health (Night soil, garbage, cesspits, wells and water) Regulations;
- Public Health (Shops, Boarding Houses, Hotels and Hostels) Regulations

NTG 1: Refer to various pieces of Northern Territory legislation

Acknowledged – refer to **Table 1**.

1.6.2 Section 1.8.2 Commonwealth of Australia Primary Legislation

NTG 2: It should be noted that the *Aboriginal Land Rights (NT) Act* is the fundamental power behind Northern Territory laws for protection of sacred sites. This Act also allows the establishment of Northern Territory laws. Relevant acts to the activity not identified include:

- *Navigation Act 1912;*
- *Australian Maritime Safety Authority Act 1990;*
- *Environment Protection (Sea Dumping) Act 1981;*
- *Petroleum (Submerged Lands) (Pipelines) Regulations 2001.*

NTG 2: Refer to various pieces of Commonwealth legislation.

Acknowledged – refer to **Table 1**.

1.7 Section 1.9 Related Environmental Approvals

NTG 3: The Proponent states p23 that: "The Northern Territory will administer the longer portion of the sub-sea pipeline….*Petroleum (Submerged Lands) Act 2003."* This statement is incorrect as the appropriate parent legislation is the Commonwealth *Petroleum (Submerged Lands) Act 1967*.

Statutory Approvals and Licences:

The draft EIS p23, paragraph 3 establishes licences and approvals required for the activity. It should be noted that under the *Petroleum (Submerged Lands) (Pipelines) Regulations 2001* acceptances are required for pipeline management plans outlining:

- design and construction;
- operation;
- modification; and
- decommissioning.

This omission should be included in project milestones and in any revisions of the Environmental Impact Statement (EIS). In consideration of the identified omitted legislative requirements it is suggested that the proponent review legislative risk and attendant planning/implementation risk including any influence this issue may have on the project timing/management.

It may be appropriate here to state that the Northern Territory Government require the proponents to obtain Authority Certificates for all developments.

NTG 3: Refer to the Commonwealth parent legislation (PSLA 1967).

Acknowledged – refer to **Table 1**.

Table 1 Additional Legislation

Title	Relevance/Additional Information to that Provided in Section 1 of the Draft EIS
Northern Territory	
Food Act 2004	Responsible for ensuring that food for sale is safe and suitable for human consumption. This would apply to food supplied for consumption in the construction camp.
Public Health Act & Regulations 1997 ▪ Public Health (Shops, Boarding Houses, Hotels and Hostels) Regulations. ▪ Public Health (Night soil, garbage, cesspits, wells and water) Regulations ▪ Public Health (General sanitation, mosquito prevention, rat exclusion and prevention) Regulations	This act and regulations relate to the health of the public. Particular regulations prescribe to matters in relation to prevention of disease, maintenance of health, sanitation, the designation of diseases and measures for the control of diseases.
Northern Territory Aboriginal Sacred Sites Act.	The accommodation between sacred site protection and land use is achieved mainly by sacred site avoidance under Authority Certificates under the Aboriginal Sacred Sites Act. Proponents proposing to use or work on land may apply to the Aboriginal Areas Protection Authority for an Authority Certificate to cover their proposed activities. The Authority will respond to an application by consulting the relevant Aboriginal custodians within 60 days to ascertain whether a Certificate can be issued and any conditions needed to protect any sacred sites that might be affected by the proposed works.
NT Planning Act	For the purposes of constructing the pipeline and the gas plant land will need to be cleared which will require a land clearing permit under the Planning Act. No clearing will commence prior to receipt of this permit.
Commonwealth	
Navigation Act 1912	The Navigation Act 1912 is the basic Commonwealth legislation that regulates most safety-related operational aspects of overseas and interstate voyages by Australian and foreign-flagged trading ships.
Petroleum (Submerged Lands) (Pipelines) Regulations 2001	The object of these Regulations is to ensure, over the operating life of offshore pipelines that are for use in conveying petroleum, that licensees for the pipelines use systems, work practices and procedures that will ensure that: (a) the pipelines are designed, constructed, operated and modified in ways that are suitable for the purposes for which the pipelines are to be used; and (b) proposals for decommissioning pipelines are suitable for the purposes for which they are made; and (c) the risks of significant pipeline accident events, and the risks to the integrity of the pipelines, are reduced to levels as low as reasonably practicable. Under these regulations acceptances are required for pipeline management plans outlining the following: ▪ Design and construction ▪ Operation ▪ Modification ▪ Decommissioning

Title	Relevance/Additional Information to that Provided in Section 1 of the Draft EIS
Australian Maritime Safety Authority Act 1990	The Act promotes maritime safety; protection of the marine environment from pollution from ships and other environmental damage caused by shipping.
Environment Protection (Sea Dumping) Act 1981	The Sea Dumping Act regulates the deliberate loading and dumping of wastes and other matter at sea. It applies to all vessels, aircraft or platforms in Australian waters and to all Australian vessels or aircraft in any part of the sea. It regulates the permitted dumping of wastes at sea to ensure the environmental impact is minimised for example with dredge spoil or the disposal of vessels or platforms. The Act does not cover operational discharges from ships, such as sewage and galley scraps. Those are regulated by the Protection of the Sea legislation administered by the Australian Maritime Safety Authority.
Aboriginal Land Rights (NT) Act	Is the fundamental power behind Northern Territory laws for protection of sacred sites.

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- **Table 2 Relevant Legislation and Australian Standards**

Draft EIS Page No.	Draft EIS Section	Draft EIS Section No.	Description	Reference to relevant text in Draft EIS	Applicable Legislation/ Standard/ Design Code
20	Introduction	1.8.3	Technical standards and codes of practice	*'As well as complying with all applicable Australian Standards, design and construction must conform to the following authorities.'*	Refer to Appendix B, Volume 1 and the remainder of information provided in this Table.
64	Project Description	4.5.3	Gas Export Pipeline specifications & Corridor Requirements	*'Design and construction of the export pipelines will be in accordance with the requirements of AS2885.1 for the onshore section, as well as relevant legislation and licence conditions.'*	Refer to Table 3.
80	Project Description	4.5.7	Onshore Pipelines	*'Installation of the onshore section will be undertaken in consultation with local community and as required by AS2885.1, relevant legislation and licence requirements.'*	Refer to Table 3
93	Project Description	4.5.7	Coating & Corrosion Protection	*'The coating quality will be checked against strict acceptance criteria and in accordance with AS2885 and related Australian Standards.'*	Refer to Table 3
117	Project Description	4.7.4	Produced Water Treatment	*Treatment will meet all relevant environmental requirements (principally the PSLA and associated regulations), and Woodside's standards'*	NT P(SL)A Schedule Specific Requirements as to Offshore Petroleum Exploration and Production 1995
127	Project Description	4.8.7	Lighting (onshore)	*There will also be security lighting and road lights within the gas plant boundary. The lighting system will take into account any environmental requirements. Otherwise, lighting levels will be in accordance with industry standards'.*	AS/NZS 1158.0:1997 (Road lighting – introduction). As/NZS 1158.1.1:1997/Amdt 1:1998 (Road lighting vehicular traffic – performance installation design requirements). AS/NZS 1158.1.3:1997 (Road lighting vehicular traffic – guide to design, installation, operation & maintenance). AS 4282-1997 – Control of the obtrusive effects of outdoor lighting

Draft EIS Page No.	Draft EIS Section	Draft EIS Section No.	Description	Reference to relevant text in Draft EIS	Applicable Legislation/ Standard/ Design Code
151	Waste and Emissions Inventory	6.1	Waste & emissions Management Principles	*'Waste and emissions management will be undertaken according to Woodside's Environmental Standards and Aspirations document (Woodside 2003c) and relevant Woodside guidelines and legislative requirements.*	Legislative requirements will be confirmed in advance of construction. Applicable legislation includes: P(SL) (Management of Environment) Regulations 1999. NT Waste Management and Pollution Control Act 1998. NT Waste Management and Pollution Control (Administration) Regulations.
154	Waste and Emissions Inventory	6.2.1.1	Non-hazardous solid waste	*'In accordance with MARPOL regulations and regulatory authority requirements plastics, plastic products of any kind, domestic waste and maintenance waste will not be disposed of overboard, but disposed or recycled at appropriate waste facilities onshore, most likely at Darwin'.*	MARPOL Annex V – Prevention of Pollution by Garbage from Ships. P(SL) (Management of Environment) Regulations 1999.
155	Waste and Emissions Inventory	6.2.1.2	Liquid Waste	*Sewage will be treated and disposed of in accordance with statutory regulations, as detailed in Section 12.5.'*	NT Waste Management and Pollution Control Act 1998. NT Waste Management and Pollution Control (Administration) Regulations.
156	Waste and Emissions Inventory	6.2.1.2	Liquid Waste	*'Offshore, sanitary wastewater will be generated by personnel housed on vessels. The effluent will be disposed of in accordance with MARPOL regulations'.*	MARPOL Annex IV – Prevention of Pollution by Sewage from Ships.
346	Marine Impacts	11.8	Drilling Wastes and Discharges	*'Cuttings generated while drilling with NWBMs will be separated from the drill fluids to meet statutory requirements'.*	P(SL) (Management of Environment) Regulations 1999.
358	Marine Impacts	11.17	Ballast Water	*'Support vessels, work boats and tugs generally do not have ballast tanks. However, if they are large enough vessels to have ballast tanks then the same regulations will apply as for tankers'*	MARPOL Annex I – Prevention of Pollution by Oil. P(SL) (Management of Environment) Regulations 1999. AQIS Australian Ballast Water Management Requirements 2000.

Draft EIS Page No.	Draft EIS Section	Draft EIS Section No.	Description	Reference to relevant text in Draft EIS	Applicable Legislation/ Standard/ Design Code
374	Marine Impacts	11.19.2	Effects on Biota	*'All facilities (platform, pipeline and export facility) will be designed and maintained to ensure compliance with legislative requirements (PSLA and MARPOL 73/78), industry standards and extreme weather predictions'.*	P(SL) (Management of Environment) Regulations 1999. P(SL)A Schedule. Specific Requirements as to Offshore Petroleum Exploration and Production (2004). P(SL) (Pipelines) Regulations 2001. P(SL) (Management of Safety on Offshore Facilities) Regulations 1996. MARPOL Annexes I-V.
377	Marine Impacts	11.20.1	Waste	*'Waste management practices will be in accordance with Woodside's Environmental Standards and Aspirations (Woodside 2003c) and applicable legislation, conventions and guidelines including the PSLA, MARPOL 73/78 and APPEA guidelines.*	P(SL) (Management of Environment) Regulations 1999. P(SL)A Schedule. Specific Requirements as to Offshore Petroleum Exploration and Production (2004). MARPOL Annexes I-V. APPEA Code of Environmental Practice (1996).
380	Marine Impacts	11.20.3	Hazardous Waste Stream and Chemicals	*' All chemicals will be stored in according to Australian legislation and guidelines'.*	P(SL)A Schedule. Specific Requirements as to Offshore Petroleum Exploration and Production (2004). APPEA Code of Environmental Practice (1996).
420	Terrestrial Impacts	12.5.3	Hazardous Waste Stream	*'All hazardous waste materials will be disposed of or recycled at an approved facility in accordance with Woodside's Waste Minimisation and Disposal guidelines, the project Waste Management Plan and all applicable regulations'.*	NT Waste Management and Pollution Control Act 1998. NT Waste Management and Pollution Control (Administration) Regulations. Schedule 2 of Agreement between Agencies on matters relating to the implementation of the National Environment Protection Measures for the Movement of Controlled Waste between States and Territories.

Draft EIS Page No.	Draft EIS Section	Draft EIS Section No.	Description	Reference to relevant text in Draft EIS	Applicable Legislation/ Standard/ Design Code
421	Terrestrial Impacts	12.5.4	Handling of hazardous materials	*'All chemicals will be stored according to Australian legislation and guidelines where applicable'. All waste products will be stored according to Australian legislation and guidelines where applicable'.*	NT Waste Management and Pollution Control Act 1998. NT Waste Management and Pollution Control (Administration) Regulations.
478	Environmental Management	15.1	Environmental Management plans	*'A consolidated overarching EMP document will be developed to bring together all the individual onshore/ nearshore EMPs, in accordance with recognised standards and applicable Commonwealth, Western Australian and Northern Territory legislation.*	NT Environmental Assessment Act P(SL) (Management of Environment) Regulations 1999.

- **Table 3 Relevant Pipeline Design Standards and Codes**

Legislation	
Petroleum (Submerged Lands) Act 1967, Commonwealth	
Petroleum (Submerged Lands) (Pipelines) Regulations 2001, Commonwealth	
Petroleum (Submerged Lands) Act 1982, Northern Territory of Australia.	
Petroleum (Submerged Lands) Regulations, 1987, Northern Territory of Australia	
Energy Pipelines Act 1982, Northern Territory of Australia	
Energy Pipelines Regulations 2001, Northern Territory of Australia	
Principle Design Codes	
AS 2885.1	Pipelines, Gas and Liquid Petroleum Part 1: Design and construction.
AS 2885.4	Pipelines, Gas and Liquid Petroleum Part 4: Offshore submarine pipeline systems
AS 4130	Polyethylene (PE) pipes for pressure applications (Produced Water Pipeline only)
AS 2566	Buried flexible pipes (Produced Water Pipeline only)
Secondary Design Codes	
OS–F101	Submarine Pipeline Systems, OS–F101, Det Norske Veritas, 2000, with amendments up to April 2004
API RP 1102	Steel Pipelines Crossing Railroads and Highways, 1993
SAA HB105	Guide to Pipeline Risk Assessment in Accordance with AS 2885.1, 1998
AS 1170.4	Minimum design loads on structures - Earthquake loads
Material Standards	
AS 4131	Polyethylene (PE) compounds for pressure pipe and fittings
Corrosion Protection	
AS 2239	Galvanic (Sacrificial) Anodes for Cathodic Protection, 1993
NACE RP0492	Metallurgical and Inspection Requirements for Offshore Pipeline Bracelet Anodes
AS/NZS 3862	External Fusion-Bonded Epoxy Coating for Steel Pipes, 2002
Construction Standards	
API RP 5LW	Recommended Practice for Transportation of Line Pipe on Barges and Marine Vessels-Second Edition, 1996
AS 2885.2, 02/05/1995	Pipelines - Gas and Liquid Petroleum - Part 2: Welding-NZS/AS 2885.2: 1995; Amdt 1 July 1996. [1]
AS/NZS 2885.5, 04/04/2002	Pipelines Gas and Liquid Petroleum Part 5: Field Pressure Testing[1]
Operation Standards	
DNV-OS-F101	Submarine Pipeline Systems-Includes All Amendments and Corrections up to April 2004
AS 2885.3, 09/01/2001	Pipelines - Gas and Liquid Petroleum - Part 3:

[1] Onshore pipeline only

Legislation	
	Operation and Maintenance-NZS/AS 2885.3: 1997[1].

1.8 Clarifications

Points of clarification on some of the submissions have been sought from DEH and NT Government. The Proponent would like convey their sincere thanks to Mr Rod Johnson and Dr David Wilson (OEH) and Lynne Alexander and Tim Kahn (DEH) for the clear and valuable guidance they have provided to the Proponent, when requested to provide clarifications on submissions received from their respective Government departments.

- **Table 4 Summary of Issues Raised in Submissions**

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
ECNT 1	Together with the TTP and the Alcan expansion, the Blacktip Project should undergo a much higher level of strategic environmental assessment.	N/A	1.4
NLC 1	Be advised that TOs have not approved of any use of land or works or impacts on the land.	N/A	1.4
NLC 2	The Project Schedule in Figure 1-3 is frivolous.	Figure 1-3	1.4
NLC 22	The EIS appears to be written to beg the need for further supplementary data and delay before Government can approve the EIS.	N/A	1.4
NLC 24	The NTG has not determined the procedures for administrating a gas plant under the Waste Management and Pollution Control Act 1998.	1.8	1.4
NTG 1	Refer to various pieces of Northern Territory legislation	1.8.1	1.5.1
NTG 2	Refer to various pieces of Commonwealth legislation	1.8.2	1.5.2
NTG 3	Refer to the Commonwealth parent legislation (PSLA 1967)	1.9	1.6
NLC 23	There is no mention of the potential safety impact in the infrastructure and transport section	Executive Summary	3
OEH 59	Discuss Woodside's commitment to the Wadeye community to provide gas from Blacktip as a possible future power source.	1.6	4.1
OEH 68	Replace references to "relevant legislation" and "Australian standards" with citations of existing standards and legislation.	1.8	4.2
NTG 115	Prior to conducting any further work in the NT/P 66, NT/P 67 and vacant acreage ensure that appropriate legislative authorities related to access are in place.	1.9	4.3
NLC 34	Clarify projections of the estimated life span of the project.	1.10	4.4
NLC 21	The EIS does not consider the problems that Woodside's leasing objectives create for traditional Aboriginal owners.	1.10	4.4
NLC 25	It is assumed that Government is assessing the project for 30 years not for 75 years. The NLC seeks affirmation, or otherwise, from Government on this matter.	1.10	4.4
NLC 39	Clarify projected time to decommissioning with reference to the length of the lease.	1.10	4.4
NLC 13	Consider options for the supply of gas for power generation, or electricity, to the Wadeye community.	2.1.3	5.1.1
OEH 60a	Provide support for claims in the Draft EIS that the proposal will bring opportunities for indigenous communities.	2.2.1	5.2.1
NTG 4	Stipulate that the proponents funded the NLC to carry out site protection surveys and that the AAPA had no role in these.	3.1	6.1
NLC 11	Clarify Woodside's position regarding the Social Impact Management Plan and consultation with the traditional Aboriginal owners.	3.1	6.1
NTG 6	Indicate how the proponent will provide feedback to key stakeholder groups relating to any issues they have raised.	3.2	6.1
NLC 28	Note consultation with key traditional Aboriginal owners and the NLC on Friday 3rd September.	3.2.1	6.2.1

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
NTG 5	Specify that with regard to sacred site clearances the majority of consultative activities were carried out by the NLC.	3.2.1	6.2.1
NLC 29	Address conflicts between Woodside's consultation methodology and NLC responsibilities.	3.3.1	6.4
NTG 7	Develop a communication strategy appropriate for the project stakeholders, including formalising relationship with the NLC.	3.3.1	6.4
OEH 60b	Specify Woodside's management strategy to take into account the wishes of the traditional Aboriginal owners.	3.3.1	6.4
NLC 31	Address lack of consultation with the traditional Aboriginal owners with regards to landuse requests.	4.1	7.1
NLC 32	Advise traditional Aboriginal owners of Woodside's wish to construct a 1 hectare waste facility within the plant footprint area.	4.1	7.1
NLC 33	Clarify the project schedule, addressing the timing of road access across the Daly River.	4.1	7.1
ECNT 3	Discuss the cumulative impacts on benthic and fish communities of drilling wastes.	4.4.2	7.2.1
OEH 23	Explain the composition of "pipe dope" and quantify its likely volume and impact.	4.4.3	7.2.2
OEH 28a	Specify the hazardous qualities of drilling muds.	4.4.2	7.2.1
OEH 28b	Analyse the environmental impacts of non water based muds, including analysis of open versus closed circulation systems.	4.4.2	7.2.1
OEH 28c	Quantify the extent, impact and temporal persistence of drilling mud wastes, and discharge plumes.	4.4.2	7.2.1
OEH 1	Present "worst-case scenarios" for evaluation together with a management plan for its occurrence.	4.5.2	7.3.1
NTG 119	Has pipeline design considered the potential for future increased capacity for petroleum developments utilising the export pipeline as a carrier to processing facilities?	4.5.3	7.3.2
NTG 9a	Discuss options and approvals for dredging spoil disposal at sea with reference to the Commonwealth *Environmental Protection (Sea Dumping) Act 1981*.	4.5.4	7.3.3
NTG 9b	Identify any possible effects of trenching methods on the Walpinhthi Reef sacred site.	4.5.4	7.3.3
OEH 4	Quantify sediment disturbance for each of the two options for post-lay trenching (plough versus jetting sled.	4.5.4	14.2
OEH 24	Explain the constituents, toxicity, sink details, amount required and the likely impact on the environment of "corrosion inhibitor".	4.5.4	14.6
NLC 49	What is the chemical composition of scale formation inhibitor and their potential impact on the receiving environment?	4.5.4	14.6
NTG 10	Explore any possible effects of trench dredging on the Walpinhthi Reef sacred site.	4.5.6	7.3.3
ECNT 9	Explain why the exact location of the two beach laydown areas has not been confirmed.	4.5.6	7.3.4
OEH 8	Discuss alternative options for to the pipe laydown area and provide justification for the final selection.	4.5.6	7.3.4
NLC 18	Discuss alternatives for the two temporary beach laydown areas, and detail how these areas will be rehabilitated.	4.5.6	7.3.4
NLC 35	Consider alternative locations for the two temporary laydown areas. Is the beach or the dune area needed?	4.5.6	7.3.4
OEH 9	Provide details for the proposed shore crossing that would enable an environmental assessment to be made.	4.5.6	7.3.4

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
NLC 4	Provide further information on the pipeline alignment through the Shell Midden and reasons why directional drilling to bring the pipeline onshore should not be used to avoid environmental impacts.	4.5.6	7.3.4
OEH 10	Clarify the proposed placement of the laybarge anchors, particularly will they be on the beach or in the dune.	4.5.6	7.3.4
NLC 36	Figure 4-9 is misleading as the beach would have been trenched before the pipe is winched ashore.	4.5.6	7.3.4
OEH 79	Present plans for backfilling the proposed pipeline trench.	4.5.6	7.3.4
NTG 11	Discuss alternative methods to nearshore blasting and justify why blasting is the preferred method.	4.5.7	7.3.5
NTG 12a	Discuss the impacts of temporary artificial depression of the water table.	4.5.7	7.3.5
NTG 12b	Clarify plans to obtain clearing permit to clear vegetation in preparation of Right of Way.	4.5.7	7.3.5
NTG 13	Consider Australian Standard 2885.3-2001, Section 6.2.2, Section 6.4.2 and Section 6.4.4 in plans for rehabilitating the right of way.	4.5.7	7.3.5
NTG 14	Will there be limits on the time that sections of the trenches remain open?	4.5.7	7.3.5
NTG 15a	Demonstrate the rationale behind the use of bore water for hydro testing of on shore water tanks.	4.5.8	7.3.6
NTG 15b	The project requires a land clearing permit under the *Planning Act* for the clearance of 64ha of native vegetation.	4.5.8	7.3.6
OEH 26	If seawater is to be used for hydrotesting, discuss the composition of biocides, oxygen scavengers and corrosion inhibitors in the water, along with their likely quantity and effect on the local environment.	4.5.8	7.4.2
NTG 16a	Acknowledge the need for increased road maintenance on the proposed access route from Darwin to Wadeye during construction and the need for reinstatement of the route on completion of construction.	4.5.10	7.3.7
NTG 16b	Address the impact of the road from the Wadeye Airstrip to the Onshore Process Facility on the proposed sub-division and hazard to aircraft such as dust.	4.5.10	7.3.7
OEH 11	Provide details of proposed vehicle access to the beach and laybarge anchors, stating their movement and access restrictions.	4.5.10	7.3.7
OEH 12	Present detailed surveys of the drainage of proposed construction access roads, addressing the potential affects of earthworks on runoff and the export of sediment, nutrients and pollutants.	4.5.10	7.3.7
OEH 13	Justify both the placing of a laydown area in a 50m road corridor and the specified width of 50m.	4.5.10	7.3.7
OEH 14	Present the results of “detailed environmental surveys” for “the proposed access roads and associated drainage channels and ditch run-outs”.	4.5.10	7.3.7
NLC 19	Clearly describe the proposed beach barge landing, and associated construction methodology, and the proposed haul road between the landing site and the plant site.	4.5.10	7.3.7
NLC 17.1	Discuss the option of combining the Trans Territory Pipeline right of way with the proposed all-weather access road.	4.5.10	7.3.7
NLC 17.2	Discuss Woodside’s application to the AAPA for an Authority Certificate for “temporary use of the existing track leading south from the	4.5.10	7.3.7

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
	airport junction to the Kultchil		
NLC 17.3	Clarify Woodside's application to the AAPA for an Authority Certificate covering "minor light vehicular use of existing track to Yelcherr Beach".	4.5.10	7.3.7
NLC 37	Discuss the possible impacts on existing users of the fortnightly barge service to Sandfly Creek boat ramp.	4.5.10	7.3.7
NTG 17a	Discuss the option of combining the pipeline shoreline crossing with a barge ramp.	4.5.10	7.3.7
NTG 17b	Discuss the option of upgrading the right of way haul road from a 'dry weather' road to an 'all weather' road.	4.5.10	7.3.7
NTG 18	Address the use of helicopters, including the process to ensure appropriate infrastructure is in place.	4.5.10	7.3.7
NTG 19	It would be prudent to discuss extractive options with the Dept of Business, Industry and Resource Development	4.5.11	7.3.8
NTG 20	Detail possible requirements for a quarantine and staging area, including its location and timing and regulatory implications.	4.5.11	7.3.8
OEH 15a	Detail the proposed works at the concrete batch plant if it is located outside the gas plant footprint	4.5.11	7.3.8
NTG 21	What options are available if the Wadeye Landfill does not have the capacity or if approval is not given to dispose of project wastes?	4.5.11	15.5.1
NTG 22	Note that all sources of aggregate material require an Authority Certificate.	4.5.11	7.3.8
OEH 15b	Further survey work is required regarding the feasibility of sourcing suitable aggregates.	4.5.11	7.3.8
NTG 23	There is no mention of the provision of a commercial food preparation facility for the construction camp.	4.5.13	7.4.1
OEH 22	Specify the composition and the disposal location of commissioning fluids that are proposed to flush the well after completion.	4.6.1	7.4.2
NTG 24a	Demonstrate awareness of the risks associated with chemicals used to conduct the hydrotest.	4.6.3	7.4.2
NTG 24b	Provide a review of the environmental impacts of discharges associated with releases of hydrotest water.	4.6.3	7.4.2
NTG 24c	Discuss what criteria will be used to select chemicals for the hydrotest that are 'environmentally suitable'.	4.6.3	7.4.2
NTG 25	Modelling of hydrotest discharge plumes should be undertaken.	4.6.3	7.4.2
NTG 26a	Will verification of modelled current movements be undertaken prior to discharge of hydrotest waters?	4.6.3	7.4.2
NTG 26b	Is the wind data used as input to the model parameters sufficient to represent the typical wind regime for the nearshore area?	4.6.3	7.4.2
NTG 27a	Discuss alternative locations and techniques for the disposal of produced formation water (PFW).	4.6.3	7.4.2
NTG 27b	Characterise the contaminants of Process Water and assess its effect on the marine environment both off-shore and on-shore.	4.6.3	7.4.2
NTG 27c	Pipeline Flooding and Hydrotesting Procedure and a Pipeline Pre-commissioning Procedure are required if discharge of hydrotest waters is to occur within NT jurisdiction.	4.6.3	7.4.2
OEH 43	Detail specific hydrotest and dewatering procedures, stipulating management measures to deal with predicted environmental impacts.	4.6.3	7.4.2
NTG 28	It is suggested that the frequency of pigging and pipeline right of way inspections be set out in the construction and operations pipeline management plans rather than within the pipeline license.	4.7.1	7.5.1

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
OEH 27	Clarification is sought as to the presence of H_2S in the gas field and its likely consequences.	4.7.2	7.5.2
NLC 12a	Provide details on the composition of the gas.	4.7.2	7.5.2
NLC 12b	Consider the greenhouse implications of the nitrogen content of the gas, and how greenhouse emissions could be reduced.	4.7.2	7.5.2
NTG 114	Provide specifications for the gas to be exported to Gove and the processed condensate to be loaded at the offshore mooring.	4.7.2	7.5.2
OEH 80	Present detailed results for the flare positioning	4.7.2	7.5.2
ECNT 8	Confirm design details for the project eg. the flare at the onshore gas plant.	4.7.2	7.5.2
NTG 29	Describe what measures will be taken to allay the Wadeye Community's concerns about medium & large flames from gas flaring?	4.7.2	7.5.2
OEH 34	Clarify whether the PW treatment system has been designed only for PW or for other inputs as well.	4.7.4	7.5.2
NLC 40	How will the potentially contaminated stormwater be identified, isolated and treated?	4.7.4	7.5.3
NTG 30	Assess the capacity of the Wadeye airstrip to handle competing usage and increased maintenance requirements.	4.7.5	7.5.4
NTG 31	The potable water supply shall comply with the NH&MRC Australian Drinking Water Guidelines 1996.	4.8	7.6
OEH 47	Explain further offshore and onshore storage of diesel and chemicals; fire-fighting chemicals and "appropriate bunding".	4.8.2	7.6.1
NTG 32a	How will well-head platform design incorporate spillage control techniques for chemical storage areas?	4.8.2	7.6.1
NTG 32b	Will biocide be stored on the well-head platform?	4.8.2	7.6.1
NTG 32c	What measures will be taken to prevent soil contamination from spillages in the diesel drum storage area during the construction phase?	4.8.2	7.6.1
NTG 32d	Will there be any petrol stored onsite and will the diesel and chemical storage comprise a secure compound?	4.8.2	7.6.1
NTG 33	Will there be any cooling towers that pose a *Legionella* risk to employees or the public?	4.8.3	7.6.2
NTG 34	Open & closed drainage systems must be designed to minimise mosquito breeding onsite.	4.8.8	7.6.3
NTG 35a	Provide details of alternative disposal solutions should the Wadeye Landfill be unsuitable for disposal of the sludge from the permanent sewage treatment facility.	4.8.9	7.6.4
NTG 35b	What options have been considered in determining the use of Wadeye Landfill as the preferred disposal option?	4.8.9	7.6.4
NTG 8	It is suggested that the ability remove all infrastructures at the decommissioning stage is included as a primary design criterion.	4.9	7.7
NTG 36	Decommissioning should be considered in the front end engineering design to ensure continual refinement over the life of the project.	4.9	7.7
OEH 65	The Supplement should consider the option that pipe network infrastructure is totally removed.	4.9	7.7
NTG 38	It is suggested that Woodside consider Resolution A.672 (16) of the IMO 1989 during detailed engineering design phases.	4.9	7.7
ECNT 10	The platform must be completely removed. Yet there is no discussion of this option in the draft EIS.	4.9	7.7

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
NLC 38	Consider removing some pipelines when decommissioning, for example the pipeline at the shore crossing, particularly if it could be exposed due to erosion later.	4.9	7.7
NTG 37	The role of the regulator in coordination of decommissioning extends to the timely provision of approvals to conduct the activity. Coordination of activities is the responsibility of the operator at the time of decommissioning.	4.9.2	7.7.1
NTG 39	Discuss the option of decommissioning the Blacktip facility if other facilities are using the pipeline as a common carrier.	4.9.5	7.7.2
OEH 62	Alternatives to proposed actions should be provided throughout.	5.1	8.1
NLC 14	Compare onshore and offshore processing from an environmental impact perspective as well as a technical perspective.	5.3	8.2
OEH 63	The need for an onshore flare is questioned if off-shore gas processing is undertaken.	5.3.1	8.2
NTG 40a	Provide a rational on the weighting's given to the selection criteria for processing of well stream fluids within the text.	5.3.4	8.2.1
NTG 40b	Provide further consideration to the long term impacts of the nearshore PFW pipeline.	5.3.4	8.2.1
NTG 41a	The statement 'No offshore reefs' is contradicted by the finding of coral (specifically gorgonians) assemblages at site Pipeline 11.	5.6	8.3
NTG 41b	List the efforts made to avoid damage to the Walpinhthi Reef site when the shore crossing location was decided upon.	5.6	8.3
NTG 42	Consider sacred site concerns, eg the Walpinhthi Reef and discuss alternative routes that could avoid any possible damage to the site.	5.9	8.4
OEH 38	Discuss the limitations of the Wadeye landfill and quantify the likely volume and nature of non-recyclable wastes.	6.2	9.1
NTG 43	The proponent may need to construct a new waste management facility for its exclusive use or consider negotiating with Wadeye Council to joint manage a shared facility.	6.2.1	9.1.1
NTG 44	Will the drainage management system address the risk of cross-contamination between wastewater and potable water?	6.2.1	9.1.1
OEH 40	The disposal strategy for any water unsuitable for the PW treatment system is required.	6.2.1	9.1.1
ECNT 5a	Consider the disposal of general construction waste and assess the capacity of the Wadeye landfill to accept this waste.	6.2.1	9.1.1
ECNT 5b	Very little detail about the hazardous waste generated in construction phase is provided particularly the quantities of waste.	6.2.1	9.1.1
OEH 36	Describe the system on the wellhead for blocking the overboard drains to prevent an oil spill.	6.2.1	9.1.1
OEH 41	Describe the expected quantities of contaminants remaining after PW treatment, and how these contaminants will be disposed.	6.2.1	9.1.1
NTG 45	What is the composition of the PW, particularly with regards to microbiological quality?	6.2.3	9.1.1
NTG 46	Provide details on how the silica gel will be replaced, particularly with regard to the transport of the hazardous waste.	6.2.3	9.1.1
NTG 116a	From modelling of emission concentrations, what is the risk to the township of Wadeye under worst case operational scenario?	6.3	9.2
NTG 116b	What are the meteorological conditions that represent the worst case scenario for the Wadeye township?	6.3	9.2
NTG 116c	What is the timeframe in which control of the facility could be re-established if critical equipment failed	6.3	9.2

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
NTG 116d	Are manual overrides, i.e. hand operated isolation valves, to be installed in the processing system?	6.3	9.2
NTG 47a	Will there be any health impact on the Wadeye Community from the atmospheric emissions from the plant?	6.3	9.2
NTG 47b	What do people do if they claim that they are being affected by emissions from the plant?	6.3	9.2
NTG 47c	What mechanisms will be in place to monitor and assess complaints?	6.3	9.2
OEH 48	Quantify the offshore [gas] emissions.	6.3.1	9.2.1
ECNT 4a	There is no estimate for greenhouse emissions from flaring during commissioning and the early phase of operations.	6.3.1	9.2.1
ECNT 4b	Potential climate change impacts should be investigated in the Greenhouse Gas Management Plan.	6.3.1	9.2.1
NLC 41	The Yek Maninh people use and camp along the length of their coastline, not just at the TCG. The focus on this locality is artificial in regards to Aboriginal land use and EIS impact assessments.	6.4	9.3
NLC 16.2	Discuss the potential noise impacts on of Yelcherr Beach and Injun Beach.	6.4	9.3
NTG 48	Octave Band analysis of sound levels should be conducted to give a more realistic picture.	6.4	9.3
ECNT 11	Discuss the likely offshore noise impacts to marine mammals from the Jack up rig.	6.4.3	9.3.1
NLC 42	Revise consideration of noise impacts during day to day operations and their impacts on amenity of the surrounds and locals.	6.4.4	9.3.2
NTG 49a	Comment on the validity of the marine offshore fauna survey, based on four days of grab-sampling.	Technical Appendix B, vol 2	20.2
NTG 49b	It would appear that the Western Australian Museum or MAGNT have not been contacted for fauna records from the area.	Technical Appendix B, vol 2	20.2
NTG 49c	All the conclusions about fauna are based on the marine offshore survey. A few grab samples do not give a good idea of what the fauna really is.	Technical Appendix B, vol 2	20.2
NTG 50	What is the expected frequency of cyclonic activity?	7.2.2	2
OEH 5	Evaluation of pipe construction requirements and the effect these may have on the seabed should be presented.	7.2.3	10.1.1
NTG 51	Information on water quality nearshore is available from the work undertaken by LeProvost Dames and Moore for Teikoku Oil (Bonaparte Gulf) Co Ltd in 1994.	7.2.4	10.1.2
NTG 118a	Have the presence of high frequency currents been considered as a criterion for detailed design engineering studies?	7.2.4	10.1.2
NTG 118b	What further investigations will be conducted in relation to high frequency currents at the proposed location?	7.2.4	10.1.2
OEH 73a	The Supplement should detail the type of biota present at the condensate mooring	7.3	10.2
NTG 52a	The statement 'high turbidity and river flows appear to limit epibenthic development' is unlikely to be true for the Joseph Bonaparte	7.3.1	10.2.1

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
	Gulf.		
NTG 52b	Fig 7-4 shows the distribution of mangroves where the proposed pipeline will cross the shore, not the extent of mangroves in the Joseph Bonaparte Gulf and surrounding area, as stated in the text.	7.3.1	10.2.1
OEH 6a	Recognise that habitat diversity is different to habitat scarcity and the significance of mangroves as a regional habitat.	7.3.1	10.2.1
OEH 6b	Describe the coastline habitat at the particular point where the pipeline is proposed to rather than a generic beach description.	7.3.1	10.2.1
NLC 15	Section 7.3.2 provides no information on the ecology of the rocky ridge 1-1.5 km from shore, or Walpinhthi Reef.	7.3.2	10.2.2
NLC 45a	The EIS baseline surveys not finding any macroalgae is not sufficient, particularly since “there has been no comprehensive mapping of marine macroalgae…” (page 212).	7.3.2	10.2.2
NLC 45b	The seagrass survey methodology is difficult to assess without knowing the details of the sample technique.	7.3.2	10.2.2
OEH 69a	The suggestion that conditions are not suitable for macroalgae growth needs to be qualified with some quantitative measures of limiting conditions.	7.3.2	10.2.2
OEH 69b	Further investigation of seagrass presence is required as significant areas of seagrass may exist in small extents.	7.3.2	10.2.2
NTG 54	The gorgonian corals collected during the survey of the proposed pipeline route, are not mentioned in the section on Corals.	7.3.2	10.2.2
NTG 55a	Lower intertidal habitats and communities of the sand beach/sand flat are not discussed.	7.3.3	10.2.3
NTG 55b	The comparison between the upper intertidal of Northern Yelcher Beach with the mid-tidal zone at Southern Yelcher Beach is not a valid comparison given the degree of zonation expected on these beaches.	7.3.3	10.2.3
NTG 53	Prawn species are discussed, but the text is very general and poorly referenced.	7.3.4	10.2.4
OEH 70	Discussions on invertebrate and fish populations assume that populations are similar to elsewhere in the Top End.	7.3.4	10.2.4
NLC 46	It is questionable whether the desktop information provided is sufficient to make confident statements on impacts to fish in the project area.	7.3.5	10.2.5
ECNT 12b	It appears no fish surveys were completed in offshore areas as information provided is from outside Joseph Bonaparte Gulf.	7.3.5	10.2.5
NTG 56	This section does not deal adequately with presence of endangered or threatened elasmobranchs or other fish in the region.	7.3.5	10.2.4
OEH 71a	Dugong surveys should be undertaken.	7.3.6	10.2.6
OEH 71b	Information is required on the susceptibility of Dugongs to oil spills.	7.3.6	10.2.6
OEH 71c	An absence of seagrass does not necessarily mean there will be an absence of dugongs.	7.3.6	10.2.6
OEH 71d	The text is not clear on the level of dugong activity in the area.	7.3.6	10.2.6
OEH 72	Management strategies for sea turtles need to be addressed and presented for evaluation.	7.3.9	10.2.7
NTG 57	This section lacks detail on small, cryptic fauna that can only be obtained through comprehensive, multi-seasonal surveys.	8.2	11.1

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
OEH 54	Rainfall and storms will have an impact on the proposed project site. Storm surge mitigation details are sought.	8.2.2	11.1.1
OEH 57	The Supplement should include a flood frequency analysis of the proposed site to enable assessment of the risk of flooding.	8.2.2	11.1.1
OEH 81	Detailed results should be presented for the flood studies.	8.2.2	11.1.1
OEH 55a	Indicate the location of groundwater bores and discuss the availability of groundwater for drinking and for hydrotesting of pipes.	8.2.6	11.1.2
OEH 55b	A full water balance should be presented detailing use, source and sink of all water sources for the duration of the project.	8.2.6	11.1.2
OEH 56a	Discuss the potential of ground and surface water systems to be affected by water bores, access routes, borrow pits and quarries and establishment of laydown areas.	8.2.6	11.1.2
OEH 56b	Discuss the environmental effects of the proposed onshore structures on the hydrological system.	8.2.6	11.1.2
OEH 58	A groundwater survey of the region should be undertaken to assess the available resource both for the life of the project and for ongoing concerns of the local community.	8.2.6	11.1.2
OEH 82	Detailed results should be presented for the groundwater studies	8.2.6	11.1.2
NTG 58	The report generated by the on-site study to determine the extent of acid sulphate soils should be submitted.	8.2.5	11.1.3
NTG 59	How has the design of Flora and Fauna surveys ensured adequate and appropriate information is obtained in relation to this setting?	8.3.1	11.2.1
ECNT 12a	With limited field surveys of the region it is impossible to adequately assess the impacts on wildlife, including protected species.	8.3.1	11.2.1
OEH 44	Discuss the management and disposal of green waste from areas that are proposed to be cleared.	8.3.2	11.2.2
OEH 74	Recognise the proponents' responsibility to ensure that new weed species are not introduced and that existing weeds do not accelerate their colonisation.	8.3.4	11.2.3
NTG 60	The terrestrial fauna species list does not satisfy the requirement that significant species do not occur on site.	8.3.5	11.2.4
NTG 61	What is the rational associated with the burning of Swamp 1 to minimise mosquito habit? What alternative mechanisms have been explored?	8.3.6	11.2.5
OEH 83	Detailed results should be presented for mosquito breeding sites.	8.3.6	11.2.5
NLC 47a	The data on migratory birds is inadequate.	8.3.7	11.2.5
NLC 47b	The Oil Spill Management Plan must take into account the role that the local area, including the project area, has in hosting bird species and populations.	8.3.7	11.2.5
NTG 62	Approval of the Department of Defence to the infringement in its naval training and RAAF exercise areas should be a prerequisite to an EIS approval.	9.5	12.1
OEH 78	Quantification of the risk of stray firing incidents is sought in the Supplement, along with any arrangements made with the military to mitigate any accidents.	9.5.2	12.1.1
NTG 63a	Have appropriate procedures and processes been established regarding identification of any unexploded ordinance in the construction	9.5.2	12.1.1

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
	area?		
NTG 63b	What agreements or relationships are in place in regard to the shared use of this area particularly in relation to risks associated stray firing impacting on the project.	9.5.2	12.1.1
NTG 64a	The EIS discusses the presence and number of licences of fisheries of all kinds, however there is almost no discussion as to what is caught in these fisheries, or their bycatch.	9.7	12.2
NTG 64b	The information provided in the section on fisheries is poorly referenced.	9.7	12.2
NTG 65	Clarify the definition of a sacred site and consider the possibility that archaeological sites are also sacred sites.	9.9.2	12.3.1
OEH 66	To what extent will the recommendations within the archaeological survey report by Begnaze be implemented in the final design plans?	9.9.2	12.3.1
NTG 66a	A section that clearly illustrates the *NTASSA*'s definition of a sacred site and the penalties for illegal entry, illegal work and desecration of a sacred site is required.	9.10	12.4
NTG 66b	The report should discuss the possibility of Walpinhthi Reef being interfered with by offshore developments in more detail and the efforts made to minimise damage.	9.10	12.4.1
NTG 67a	Clarify the impact on Walpinhthi Reef by the proposed development.	9.10.1	12.4.1
NTG 67b	Consistent spelling of the names of the two Aboriginal groups identified as having responsibility for various sacred sites is required.	9.10.1	12.4.1
OEH 67	The Supplement should include further consideration of the planned disturbance to Walpinhthi Reef.	9.10.1	12.4.1
NLC 48	Figure 9.10 should show the location of the PW outlet in relation to Walpinhthi Reef.	9.10.1	12.4.1
NLC 50	There is no discussion of the relevant local businesses and services that exist at Wadeye.	9.12.1	12.5.1
NLC 51	Would an additional risk of a hydrocarbon spill come from a rupture of the subsea export pipeline or condensate pipeline through such causes as anchor strike?	16	13
NLC 66	Is there any risk of anchor strike with the pipeline?	16	13
OEH 2	Consider and describe the consequences of damage to the pipe by accidental anchor strike.	16	13
NTG 68a	Has the proponent given consideration to risk assessment of terrorist activity for an unmanned wellhead platform?	16	13
NTG 68b	The EIS has not discussed the risk assessment, and environmental impacts, of export pipeline rupture for events such as a strike by a sinking vessel or dropped objects.	11 & 16	13
NTG 68c	It is requested that Woodside demonstrate that the community of Wadeye has understood the risks inherent with the project	16	13
NTG 69	Monitoring of settling and colonisation of the structure and surroundings for fish and invertebrates is required.	11	20.9
NLC 56	Would the support vessels to the trading tankers assist with all moorings at the condensate mooring?	11.2	14.1

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
OEH 3	The Supplement should quantify the potential impact of pipeline construction on the seabed rather than reporting it as “slight”.	11.3	14.2
OEH 4	Quantify sediment disturbance for each of the two options for post-lay trenching (plough vs. jetting sled).	11.3	14.2
OEH 5	Evaluation of pipe construction requirements and the effect these may have on the seabed should be presented.	11.3	14.2
NTG 71a	What will be the expected location of the cargo vessel anchors forward or to the rear of the swamp mooring?	11.3	14.2
NTG 71b	Discuss the validity of the Fugro geotechnical report’s findings on the biota of the area.	11.3	14.2
NTG 71c	The term “sacred site” should be used rather than “sensitive Aboriginal cultural site” when referring to Walpinhthi reef. Discuss impacts on the reef.	11.3	14.2
NTG 71d	This section should indicate any possible alternatives for the location of the pipeline and mooring facilities.	11.3	14.2
NTG 72	Comment on the effect oil and hydrocarbon spillage may have on the Walpinhthi Reef sacred site is needed.	11.3	14.8
NTG 73	The contribution of the project to increased mortality amongst hatchlings in an already vulnerable species needs to be put in context.	11.4	14.3
OEH 16	More discussion is required regarding the intended use of the groyne, impacts of the groyne and a timeline of groyne presence.	11.4	14.3
OEH 7	The likelihood of exotic species being introduced through fouling should be clarified. Describe proposed mitigation measures.	11.6	14.4
NTG 74a	The draft EIS does not adequately address aquatic pests, in particular the translocation of non-indigenous fouling species on rigs etc.	11.6	14.4
NTG 75a	What is the cumulative impact associated with drilling a number of wells at the location? What are the volumes of drill cuttings expected to be discharged?	11.8	14.4
NTG 75b	Consider chemical changes that result from oxygen depletion i.e. from aerobic to anaerobic decomposition and the potential impacts on the benthic environment.	11.8	14.5
NTG 75c	Information is required for the primary secondary and tertiary breakdown products of non-water based drilling fluids, including persistence.	11.8	14.5
OEH 29	Discuss the potential impacts to phytoplankton and zooplankton from the drilling waste discharge plume.	11.8	14.5,14.8
OEH 30	Quantify and discuss the proposed volume of hydrocarbon to be discharged to sea.	11.8	14.8
OEH 25a	Name and quantify the chemicals that are expected to be used for hydrotesting, and detail their toxicity.	11.13	7.4.2
OEH 25b	Detail the location, time, frequency, concentrations and loads of any discharge.	11.13	7.4.2
OEH 25c	Discuss disposal options for hydrotest water, including possible disposal at the wellhead platform, with respect to impacts and management.	11.13	7.4.2
NTG 76	Please provide further justification for the stated hydrotest discharge location.	11.13	7.4.2
NLC 49	What is the chemical composition of scale formation inhibitor?	11.14	14.6
NTG 31	Details on NORMS disposal were requested.	11.14	14.6

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
OEH 31	The Supplement should explain the composition, expected loads and concentration of scale material.	11.14	14.6
NTG 77	Consider in more detail the precipitation of naturally occurring radioactive materials (NORMS) within production equipment.	11.14	14.6
OEH 32	Quantify the "rapid dispersion of the biocide by the surrounding ocean at the discharge point" in both space and time.	11.15	14.7
OEH 33	Produced water (PW) may result in an oily sheen. Dispersion has perhaps been overstated as a mechanism throughout the report given the pulsing currents in this tidal area.	11.18	14.8
NLC 53a	Maximum modelled hydrocarbon concentrations below 5 ppb is a poor factor of safety on which to base assurances that no tainting of marine life (eg oysters) will occur.	11.18	14.8
NLC 53b	The EIS fails to explain that nearshore ocean disposal is not a common practice and is prevented in southern states at operating gas plants.	11.18	14.8
NTG 78a	What measures will be taken to ensure that the PW, particularly on incoming tides, does not affect fish and shellfish from the project area?	11.18	14.8
NTG 78b	Will the proponent conduct ongoing testing measuring toxic effects on marine fauna & flora in the project area to verify their claims?	11.18	14.8
NLC 5a	Advise on the predicted hydrocarbon content of the contained discharge water.	11.18	14.8
NLC 5b	Discuss best practice for PW disposal including onshore disposal	11.18	14.8
NLC 5c	Discuss the impact that 4 tonne of hydrocarbons, slow released over a year, will have on marine biota in the nearshore environment.	11.18	14.8
NLC 5d	Discuss the environmental advantages and disadvantages of onshore disposal of PW.	11.18	14.8
NLC 5e	The EIS advises that both tainting and oil sheens are possible under certain conditions. Monitoring and ecotoxicological studies must be undertaken.	11.18	14.8
NLC 5f	Woodside is relying on the assumption that the quality of the PW equates to PW effluent from current offshore production sites.	11.18	14.8
NLC 5g	It is difficult to rely on modelling in the EIS justifying offshore hydrocarbon disposal within 3 or 5 kilometres of the shore when it is also advised that a low level hydrocarbon source 150km away is likely to be contaminating mangrove sediments. Consider the cumulative impacts of the PW, Hydrocarbon Spills and background hydrocarbon from Tern and Petrel. Consider increased risk with seasonality also.	11.18	14.8
NLC 5h	The location of the PW outfall relative to the sacred site should be illustrated.	11.18	14.8
NLC 5i	A more distant offshore disposal point should be implemented as a part of that best practice given there is still a risk that a 3 kilometre discharge point may not in some circumstances achieve no impact in the shore zone.	11.18	14.8
NLC 5j	The EIS must make clear what regulations would apply if the offshore disposal option were to apply.	11.18	14.8
NLC5k	The specific details of the onshore treatment process supporting an offshore PW disposal system should be subject to engineering assessment by Government and the NLC.	N/A	14.8

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
NLC 30	Traditional Aboriginal owners and the NLC were inadequately briefed on the proposed means of disposing of PW and request Woodside to address the option of onshore disposal.	11.18	6.2.1
NLC 54	Evaluate how dugong would respond to effluent from a plant water outfall, as well as the impact that the outfall could have on seagrasses that are available in the project area.	11.18	14.8
NLC 26	Consider best practice disposal of PW.	11.18	14.8
ECNT 13	Assess the risks associated with a worst case scenario spill of 100,000 cubic metres and develop a contingency plan.	11.19.1	14.9.1
ECNT 14	What are the likely impacts of the 8 cubic metre spill scenario within the 3 day period before the condensate is expected to evaporate and disperse?	11.19.1	14.9.1
ECNT 15	Consider the scenario of a 500 cubic metres spill of heavy fuel oil in the body of the report.	11.19.1	14.9.1
NLC 6a	Clarify the estimate of the chance of a small spill.	11.19.1	14.9.2
NLC 6b	Clarify what spill containment and clean up equipment Woodside would have stored at Wadeye or the proposed gas plant to manage small local spills.	11.19.1	14.9.2
NLC 6c	Traditional Aboriginal owners have expressed concern about the potential for the project to impact on their lands and food resources through insufficient attention to oil spills.	11.19.1	14.9.2
OEH 73b	Quantify the risk of [condensate] spills reaching a “sensitive resource”.	11.19.2	14.9.2
NLC 44	Qualify the statement that an epiphytic mangrove *Littorinid*, endemic to the Joseph Bonaparte Gulf, should not be affected by impacts resulting from the Blacktip project.	11.19.2	14.9.2
OEH 35	Provide more temporal information on model results and sensitivity analyses for various model parameters.	11.19.2	14.9.2
NTG 79	Consider the impacts on subsistence fisheries of an oil spill beaching on 20 km of coastline and subsequent remedial treatments for rocky platforms.	11.19.2	14.9.2
NTG 80	Consider the requirements of the ‘International Convention for the Prevention of Pollution from Ships 1973’ for the discharge of sewerage.	11.20.3	14.10.1
NLC 57	Is there any likelihood of compression being placed on the offshore platform and therefore increasing the noise levels?	11.22	14.11
ECNT 16	Discuss the impacts of noise generated by drilling on whales, particularly on the duration of the noise.	11.22	9.3.1
NTG 70	The table should also summarise the possible negative effects on the Walpinhthi Reef sacred site.	11.24	7.3.3
NLC 55	The list of impacts requiring a higher level of assessment should be extended.	12.1	13
NTG 81	There should be some discussion about possible effects on sacred sites.	12.1	15.1
NTG 82	What mechanisms will be put in place to monitor the prevalence of acid sulfate soils?	12.2.1	15.2.1
NTG 83	Further information on the Groundwater Protection Management Plan and monitoring is requested.	12.2.2	15.2.2

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
ECNT 17	Discuss the disturbance arising from borrow pits or the upgrade of access tracks to the project area.	12.3.1	15.3.1
NLC 58	Discuss the efficacy of "quick revegetation", particularly with regards to erosion control.	12.3.1	15.3.1
OEH 18	Discuss habitat fragmentation and its implications and the clearing of protected cycad and orchid plants.	12.3.2	15.3.2
NLC 59	Justify the evaluation that seabird roosting sites recorded in proximity to the proposed pipeline landfall site are of low significance.	12.3.2	15.3.2
NTG 84	Address the management of local terrestrial fauna with regards to the proposed 2.5 kilometre trench.	12.3.3	15.3.3
OEH 19	The comment that reptile activity is lower in the dry season than in the wet should be referenced and the timing for the excavated trench should be specified.	12.3.3	15.3.3
OEH 75	Formally address the issue of weed infestation.	12.3.3	15.3.3
OEH 64	Provide alternative mosquito control measures as the burning of swamps raises unnecessary greenhouse and ecological issues.	12.3.5	15.3.4
OEH 20	Consider the impacts of proposed control measures on the natural predators of mosquitoes.	12.4.1	15.4.1
NLC 20	It is suggested that EMP for biting insects is developed in consultation with traditional Aboriginal owners.	12.4.1	15.4.1
OEH 39	Detailed feasibility study results are required for the suitability of Wadeye Landfill for the disposal of waste from the project site.	12.5.1	15.5.1
NLC 61	The capacity & suitability of the landfill facility at Wadeye for waste disposal from the project needs to be assessed.	12.5.1	15.5.1
NLC 60	Provide copies of with Woodside's 'Waste Minimisation Policy and Guidelines' and the 'Environmental Standards and Aspirations' document in the appendix to the EIS.	12.5.1	15.5.1
OEH 45	Specification is required for the handling of onshore packaging waste	12.5.1	15.5.1
NTG 86	It is not recommended that the Wadeye Sewage Treatment Facilities be used as a backup for the disposal of sewage sludge from the project.	12.5.2	15.5.2
OEH 37	Alternatives to the proposal that sewage sludge be disposed of at Wadeye municipal landfill are required.	12.5.2	15.5.2
OEH 42a	Provide detailed plans for contaminated stormwater, including methods for detecting contaminated water.	12.5.2	15.5.2
OEH 42b	Indicate the intended approved location of the hazardous waste disposal.	12.5.2	15.5.2
OEH 46	Quantify the environmental impacts of all outputs specified and address issues associated with transport of hazardous waste.	12.5.3	15.5.3
NTG 87	What security will be afforded to ensure that the hazardous waste is secure?	12.5.3	15.5.3
OEH 21	Detail measures to prevent contamination of groundwater in the event of a spill, citing Australian Standards.	12.5.4	15.5.4
NTG 88	What measures will be taken to ensure that fuel is kept secure?	12.5.4	7.6.1
NTG 89a	What involvement will the Wadeye Community have with the monitoring programme and what are their options to voice concerns about possible atmospheric emissions from the project?	12.6	15.6
NTG 89b	Will non-greenhouse gas emissions be incorporated into any atmospheric monitoring to confirm the non-significance of these	12.6	15.6

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
	emissions?		
NTG 89c	How will Woodside demonstrate quantitative reporting, best practice technology and continuous improvement?	12.6	15.6
OEH 51	Address comments on the product life-cycle emissions and the revision of greenhouse emissions calculations.	12.6.1	15.6.1
OEH 52	Discuss options to offset greenhouse gas emissions specifically from the Blacktip development.	12.6.1	15.6.1
OEH 49	Include consideration of the worst-case scenario in the management summary list and the implications of atmospheric pollution moving over lands outside the project area.	12.6.2	15.6.2
NLC 62	Further information on the nitrogen levels of the gas and combustion products should be provided.	12.6.2	15.6.2
OEH 50	Explain the use of a chemical binder (MgCl2) to suppress including details of volume, persistence, application, and impact on waterways.	12.6.5	15.6.3
OEH 53	Indicate the flexibility of the flaring schedule according to cultural requirements.	12.7	15.7
NLC 63	Discuss noise standards in relation to both indoor and outdoor impacts.	12.7	15.7
OEH 17	Clarify the necessity of blasting and strategies that will be taken to minimise adverse impacts, including impacts on fauna in the area.	12.8	15.8
NTG 90	Discuss the disturbance or destruction of sacred sites in terms of economic and land use impacts.	13.1	16.1
NTG 91a	Discuss the need to maintain road pavement at or above existing levels.	13.3	16.2
NTG 91b	Discuss issues relating to sacred sites regarding the Daly – Wadeye access road	13.3	16.2
NLC 65	Identify the road safety issues which will arise from the increased traffic.	13.3	16.2
NTG 120	The issue of preventing the pipeline corridor from developing into an unofficial access way is identified but no solution to preventing such a development is provided.	13.3	16.2
NLC 3	Discuss the planned traffic management, road upgrade and maintenance plans, providing a quantitative description of the likely increase in traffic contributed by this project.	13.3	16.2
NTG 117	Address impacts of flaring on aircraft movements, control of air traffic at Wadeye and coordination for aircraft movements if flare operation is an issue.	13.3	16.2
NTG 92a	The term, “Aboriginal sensitive cultural sites” should be replaced with “sacred sites”.	13.9	16.3
NTG 92b	Discuss the requirements of the *NTASSA* and the particular between the Northern Land Council and the AAPA.	13.9	16.3
NTG 92c	Discuss the potential for disturbance, the nature of disturbance, an assessment of any possible special mitigation measures for the collection of raw material.	13.9	16.3
NTG 93	Discuss the site protection processes for the consultation stage and possible routes for the offshore pipeline away from Walpinhthi Reef.	13.9	16.3
NLC 9a	Explain intentions with regards to avoiding disturbance of sacred sites.	13.9	16.3

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
NLC 9b	Provide further technical information justifying the need for the laybarge to anchor within the restricted area boundary.	13.9	16.3
ECNT 18a	There are no details provided as to the level of impact on Walpinhthi Reef yet it is acknowledged that this is a sensitive Aboriginal cultural site.	13.9	16.3
ECNT 18b	Clarify details of the Cultural Heritage Management and discuss projects to strengthen environmental cultural values, knowledge and practices.	13.9	16.3
ECNT 19	Quantify the economic benefits to the local community, the Northern Territory and the Australian economy, including the level of employment which is likely to be generated.	13.12	16.4
NLC 7	Provide further detail on Indigenous employment & training.	13.12	16.4
NLC 27	The infrastructure associated with the Blacktip offer no special infrastructure spin-offs to indigenous communities. More detail and quantification of the socio-economic benefits of this project to the indigenous people of the area is required.	13.12	16.4
OEH 61	Details are required on the outcomes of a two-day workshop which was to be held in Wadeye.	14	17
ECNT 6	Address further the social impacts of the project.	14	17
NTG 94	The Social Impact Management Plan should be submitted and endorsed by the regulator prior to the commencement of construction.	14	17
NLC 64	Construction activities will require restriction of public movements on safety grounds and should be acknowledged in the EIS.	14	17
NLC 67	Recognise the need for all stakeholders to come to an agreement with regards to the clearing of forested areas.	14	17
NTG 95	Consider the benefits of specialised training/apprenticeships for local residents.	14.5	17.1
OEH 76	Specify how the requirements of EIS assessment will be imparted to the various contractors who will undertake the construction.	15.1	18.1
ECNT 7	No approvals should be granted until the bulk of the twenty one management plans still to be developed are completed.	15.1	18.1
ECNT 21	Develop best-practice management plans to prevent and/or mitigate a number of impacts of the proposed project.	15.1	18.1
NTG 96	Management plans for environmental issues need to be further developed and approved prior to construction.	15.1	18.1
NLC 10	EMPs are yet to be drafted and approved, so most will be assessed outside of the public comment process, this defeats the purpose of legislation requiring public presentation of the EIS.	15.1	18.1
NTG 98	It is suggested that environment plans outline environmental performance objectives, standards and measurement criteria.	15.2	18.2
NLC 43	The EIS needs to provide further details in the Oil Spill management.	15.2	18.2
NTG 97	A plan is required for monitoring of sacred sites during construction and to ensure all Authority Certificate conditions have been met.	15.3	18.3
NTG 85	Discuss the potential to include within the monitoring programme larval identification.	15.3	18.3
NTG 99	Provide a Framework Road Maintenance EMP, including measures to ensure that current levels of service are maintained during construction and plans for reinstatement on completion of work.	15.4	18.4
NLC 8	Discuss the potential land use requirements of the Waste Management Plan is so that environmental assessments & consultation can	15.5	18.5

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
	be carried out.		
OEH 77	Replace interpretative phrases with specific commitments against which the proponent will be made accountable.	15.5	18.5
NTG 100	The Exotic Species and Weed Management Plan must be developed in detail and approved prior to commencement of any construction activities.	15.5	18.5
NTG 101	Include further provisions in the Framework Traffic Management Plan.	15.5	18.5
ECNT 20	Address the lack of information provided in the draft EIS about the risks of major accidents.	16.1	18.5
NLC 52	Address the environmental impacts of a fire or explosion at the gas.	16.1	19.1
NLC 68	Present a map showing the societal risk factor contours (or industry risk factors) surrounding the gas processing plant.	16.1	19.1
NTG 102a	A 'safety bridging document' should be prepared between Woodside and it's contractors to ensure that safety management systems are aligned.	16.2.4	19.2
NTG 102b	Has pipeline design considered the potential for future developments utilising the export pipeline as a carrier to processing facilities?	16.2.4	19.2
NTG 103	Will a copy of the Emergency Response Plan be forwarded to Northern Territory Emergency Services?	16.6	19.3
Volume 2 Technical Appendices			
NTG 104	Further noise monitoring at the commissioning and operational phases should occur in accordance with Australian Standards.	A	20.1
NLC 16a	Discuss the results of current noise level readings at the proposed plant site and the placement of the recording device.	A	20.1
NLC 16b	Discuss the noise or other impacts associated with a gas venting valve at the Yelcherr Beach shore crossing.	A	20.1
NLC 16c	Clarify the frequency of "flaring" and associated noise.	A	20.1
NTG 105	Discuss results of the offshore environmental survey and the sampling process used.	B	20.2
NTG 106a	Discuss strategies to protect the environmentally sensitive mangroves and associated fauna from possible sediment overloads, oil spillages and other deleterious impacts.	B	20.2
NTG 106b	The data in Appendix B are grossly inadequate to support the claim (Page 68) "Intertidal and subtidal infauna is species rich.	B	20.2
NTG 106c	Discuss the importance and the necessity for conservation of the rare, narrow-range endemic mollusc *Littoraria ianthostoma*.	B	20.2
NTG 106d	Discuss the sampling techniques used in the offshore environmental survey. Van Veen Grab samples were inadequate and video surveys should have been used with trawls and dredge samples.	B	20.2
NTG 106e	Long-term monitoring of both the offshore and intertidal samples is requested both in the Wet and in the Dry season..	B	20.2
NTG 106f	Gastropod shown in Fig. 7H is Terebralia semistriata. Why was there no replication at each sampling station?	B	20.2
NTG 106g	Why were the reefs not sampled by other methods other than Van Veen Grab sampling?	B	20.2
NTG 106h	Given the limited nature of the survey there are insufficient grounds for the claim "the project area is unlikely to support significant	B	20.2

Reference Number	Summary of Issues Raised in Submissions	Draft EIS Reference	Supplement Reference
	benthic communities".		
NTG 106l	Undertaking a statistical analysis for a grossly undersampled benthic community is meaningless.	B	20.2
NTG 106j	Why was no attempt made to investigate the species (both target and bycatch) that the Prawn trawlers, operating in the area of the proposed pipeline, were taking?	B	20.2
NTG 106k	The anecdotal observations of vertebrates for only three days is inadequate.	B	20.2
NTG 106l	The genus name *Clypeomorus* is consistently misspelt (as "*Clypeomorphus*") on Page 51.	B	20.2
NTG 107a	A single survey to assess the coast at the impact site for sea turtles, dugongs, and seagrasses is totally inadequate.	C	20.3
NTG 107b	How will turtles and dugongs be affected by the construction of the offshore pipeline?	C	20.3
ECNT 2	Discuss the impacts of construction on turtles since it is highly probable that the local turtle population at Yelcherr Beach will be severely impacted by loss of habitat, noise, and lights.	C	20.3
NTG 108a	Field surveys for floral analyses are inadequate as several species of plants remain dormant during the Dry Season.	F	20.4
NTG 108b	Develop a strategy to minimise the establishment and further spread of the 21 weed species that occur in the project area.	F	20.4
NTG 108c	Some explanation should be provided for the inability of the consultant to identify the *Dendrobium* plants occurring in the impact area.	F	20.4
NTG 109	A single survey for biting insects conducted in the middle of the Dry Season is not adequate to draw any definite conclusions.	G	20.5
NTG 110	The single field survey of terrestrial vertebrates in the Dry Season is inadequate.	H	20.6
NTG 111a	Traditional Aboriginal owners consider molluscs, crustaceans, fish and mangrove works as Key Resources from the mangrove habitat, yet the Proponent failed to assess them.	L	20.7
NTG 111b	Justify the claim "Country damaged during the laying of the undersea pipeline, shore crossing and pipeline corridor to the gas plant would recover in a relatively short period".	L	20.7
NTG 112	A more comprehensive consideration of road safety issues and proposed management strategies is required.	M	20.8
NTG 113	Provide further detail in the framework for monitoring the offshore area and provide commitments to actions.	P	20.9.

2. Errata

- The Minister responsible for the EIS process is the Minister for the Environment and Heritage, not the "Minister for Infrastructure, Planning and Environment" (p.11).
- DIPE is an acronym for the 'Department of *Infrastructure,* Planning and Environment', *not* 'Industry' (p.41 & p.557).
- Page 23 it is stated that, 'The Northern Territory will administer the longer portion of the subsea pipeline….*Petroleum (Submerged Lands) Act 2003*." The appropriate parent legislation referenced should be the *Petroleum (Submerged Lands) Act 1967* (Cwth).
- The Draft EIS incorrectly states that on average, the Joseph Bonaparte Gulf receives ten cyclones per decade (Figure 7-2 p.172, s.7.2.2). This sentence should be replaced with the following:

  > **Figure 7-2** presents the average annual number of tropical cyclones for Australia, based on data recorded between 1968/1970 to 1998/1999 (Bureau of Meteorology 2003). Figure 7-2 indicates that the highest annual average number of cyclones is concentrated off the northern coast of Western Australia, peaking at one tropical cyclone per year. The Joseph Bonaparte Gulf and Blacktip Project area experiences in the range of 0.2 – 0.4 tropical cyclones per year (Bureau of Meteorology 2003).

- The genus name *Clypeomorus* is misspelt (as "*Clypeomorphus*") (p51).

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3. Draft EIS Executive Summary

NLC 23: Page ES21 Table ES 3. There is no mention of the potential safety impact in the infrastructure and transport section.

NLC 23: There is no mention of the potential safety impact in the infrastructure and transport section.

The purpose of the Executive Summary is to serve as a summary of the Draft EIS and particularly to identify the key findings of the environmental assessment. A Health and Safety Risk Assessment was undertaken for the project and is detailed in **Section 16**, **Volume 1** of the Draft EIS. In summary, **Table 16-1** 'Principal Safety Risks Identified by [Qualitative Risk Assessment] QRA' does not identify transport as a principal safety risk and therefore is not considered a significant focal point of the Executive Summary. **Table ES-3** 'Summary of Economic and Land Use Impacts' is very specifically entitled a summary table and so it is not the intention to address every issue associated with Infrastructure and Traffic in this table.

Under the subsection 'Traffic' (p.12) the Executive Summary states 'A Traffic Management Plan will be developed to manage and minimise these potential disruptions and will have road user *safety* as a key focus'. This Traffic Management Plan has been prepared and has been issued to government for comment. A copy of this plan is provided in **Appendix B** of this Supplement.

The Proponent's approach to the management of Health, Safety and Environment (HSE) is also summarised (p.13) in the Executive Summary.

All safety risks will be addressed further in the Traffic Management Plan.

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4. Draft EIS Section 1 Introduction

4.1 Section 1.6 Project Net Benefits

OEH 59: The Supplement should discuss the opportunity for the Wadeye community to benefit from Blacktip gas as a possible power source, in line with the statement that the project will "provide the necessary gas processing infrastructure to supply additional markets, in the event that these should mature" (Section 1.6). An example of this would be the installation of off-take valves for future gas supply at Wadeye.

OEH 59: Discuss Woodside's commitment to the Wadeye community to provide gas from Blacktip as a possible future power source.

The use of Blacktip gas for local power generation at Wadeye has been considered and discussed with PowerWater. It is the Proponent's understanding that the small gas volumes for the community's power requirements plus the need to convert from diesel generating sets to gas engines, makes the proposal very uneconomic. PowerWater, as the power supplier in Wadeye, should be consulted on this issue.

The reader is also directed to the response to **NLC 13** in **Section 5.1.1**.

4.2 Section 1.8 Regulatory Framework

OEH 68: Throughout the Draft EIS reference is made to "relevant legislation" and "Australian standards." OEH strongly recommends that these types of references be replaced with the names of existing standards and pieces of legislation.

OEH 68: Replace references to "relevant legislation" and "Australian standards" with citations of existing standards and legislation.

Refer to **Table 1**, **Table 2 and Table 3**.

4.3 Section 1.9 Related Environmental Approvals

NTG 115: As a pipeline license is not yet in place for the proposed activity, prior to conducting any further work in the NT/P 66, NT/P 67 and vacant acreage please ensure that appropriate legislative authorities related to access are in place. Consultation is required with the operators of permits through which the export pipeline will traverse.

NTG 115: Prior to conducting any further work in the NT/P 66, NT/P 67 and vacant acreage ensure that appropriate legislative authorities related to access are in place.

The Proponent recognises the need to obtain a Pipeline Licence and the need to have in place the appropriate legislative authorities.

4.4 Section 1.10 Land Tenure Approvals

NLC 34: Page 25. The EIS advises there will be a total lease life of 75 years negotiated with the NLC. The project production and export facilities are being designed for only 30 years. After or just before 30 years, the project may or may not have a future.

NLC 39: Page 131. Refers to decommissioning of the proposed Blacktip Project expected to occur approximately 30 years after start up. However, at page 24 it states that the length of the lease will be 25 years, plus two further rights of renewal of 25 years each. It should be noted that neither the Traditional Owners nor the NLC have agreed to such a lease arrangement.

NLC 21: Woodside has advised the public that it is seeking a 75 year leasing arrangement with the NLC yet it is proposing a 30 year project. This has created an issue of inter-generational equity among the TOs of the proposed project area. TOs see real problems in committing the next and future generations of landowners to a gas plant on their land. The EIS does not consider the problems that Woodside's leasing objectives create for TOs.

While it is assumed that Government is assessing the project for 30 years and not for 75 years, traditional Aboriginal owners are particularly concerned about potential cumulative environmental impacts over a 75 year period and the lack of any discussion of this in the draft EIS.

NLC 25: Page 24: Woodside has advised the public that it is seeking a 75 year leasing arrangement with the NLC yet it is proposing a 30 year project. This has created an issue of inter-generational equity among the TOs of the proposed project area. TOs see real problems in committing the next and future generations of landowners to a gas plant on their land. The EIS does not consider the problems that Woodside's leasing objectives create for TOs.

It is assumed that Government is assessing the project for 30 years not for 75 years. The NLC seeks affirmation, or otherwise, from Government on this matter.

NLC 34: Clarify projections of the estimated life span of the project.

NLC 39: Clarify projected time to decommissioning with reference to the length of the lease.

NLC 21: The EIS does not consider the problems that Woodside's leasing objectives create for traditional Aboriginal owners.

NLC 25: It is assumed that Government is assessing the project for 30 years not for 75 years. The NLC seeks affirmation, or otherwise, from Government on this matter.

The Proponent has previously advised the NLC, the NT Government and the public that it wishes to develop the Blacktip Project infrastructure into a regional gas gathering hub for the Bonaparte Gulf. While it is recognised that the current project is expected to last 30 years and the environmental approval being sought contemplates this time frame, the land tenure that is being sought is for a period of 25 years, with two further rights of renewal of 25 years each. Certainty over land tenure for the long term is required to realise growth in hydrocarbon development in the Bonaparte Gulf.

The EIS does not anywhere suggest that traditional Aboriginal owners have approved the construction and operation of the development. The Proponent is clearly aware of the interests that it seeks in the land and the development proposal and that of its relationship with the NLC and the *Aboriginal Land Rights (Northern Territory) Act 1976* (ALRA).

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5. Draft EIS Section 2 Objectives and Benefits

5.1 Section 2.1 Project Objectives

5.1.1 Section 2.1.3 Meeting Market Demand

NLC 13: The location of the Gas Processing Plant near Wadeye would provide an ideal opportunity for the supply of gas for power generation to Wadeye or supply of electricity from the plant to Wadeye. The EIS does not consider these options.

NLC 13: Consider options for the supply of gas for power generation, or electricity, to the Wadeye community.

The supply of gas to PowerWater for Wadeye power has been dealt with in **OEH 59** (**Section 4.1**).

5.2 Section 2.2 Project Benefits

5.2.1 Section 2.2.1 Economic Benefits

OEH 60a: Claims in the Draft EIS that the proposal will bring opportunities for indigenous communities need to be supported in the Supplement (Section 2.2.1).

OEH 60a: Provide support for claims in the Draft EIS that the proposal will bring opportunities for indigenous communities.

The project has done and will continue to bring opportunities to indigenous communities. To date, the benefits have included:

- Direct employment in all the survey work undertaken to date. Local indigenous people have been employed directly in their capacity as traditional Aboriginal owners, as field assistants, camp and site security staff and in collecting site samples and (Thamarrurr Rangers) monitoring water table movements during the wet season.
- Short term contracts to support the survey work via the Thamarrurr Regional Council, including backhoe hire, mechanical repairs and camp water supply.
- Additional monetary contributions to traditional Aboriginal owners to facilitate their access and involvement in plant site geotechnical and topographical studies.
- The establishment of a short term community consultation facility at Wadeye for the NLC that has resultant benefits to landowners by way of rental payments.
- Orientation visit to Otway region of Victoria to experience a range of gas plants at various ages and states of construction.
- All existing indigenous businesses in the Thamarrurr Region through to the Daly River have been contacted regarding the Blacktip Project and have been requested to complete business capability statements. The list of businesses has been submitted to the NT Industry Capability Network (NT-ICN), which is the organisation that all contractors are directed to for the purpose of accessing local Territory companies.

- In addition, bidders for the major contracts that are in the procurement process ahead of the Blacktip Project taking its FID have been advised of all existing indigenous businesses in the Thamarrurr Region through to the Daly River.

In the future, the range of potential benefits for indigenous communities will include:

- Direct employment opportunities with the Blacktip Project made available through a specific Indigenous Training and Employment Programme targeting the town of Wadeye. The Proponent has appointed the NLC's Training and Employment Unit (TEU) in collaboration with the Territory Construction Association (TCA) on a short term consultancy to develop a training and employment programme for the project. It is expected that this will be completed by the end of March 2005 and that subject to project approvals being achieved, training and employment of indigenous people in the Daly River region, would commence in May or June 2005, assuming that the Project's FID is taken. Training and employment outcomes would be dependent upon individual skills, qualifications and desire to obtain employment, however, there is expected to be a range of employment opportunities that Aboriginal people will be well placed to compete for.
- A focus of the training and employment effort for 2005 will be to ensure people are prepared for entry level to the construction work force, irrespective of vocational level. There will also be a focus on identifying and drawing from the existing skills base in the area, particularly in relation to transport and civil works.
- The Proponent is also liaising with the NT Department of Education, Employment and Training (DEET) in relation to training and labour market analysis and with the Commonwealth Government departments about similar matters.
- Opportunities to participate in the project through the supply of goods and services on a commercial basis.
- The Proponent has instituted a range of measures throughout its supply chain and procurement practices that require contractors to submit an Indigenous Affairs Management Plan which includes the requirement to detail their proposals in relation to:
  - the employment of indigenous people;
  - the provision of work place training for indigenous people;
  - the provision of opportunities for indigenous people to participate in businesses or similar commercial relationships with the Contractor, or by way of sub-contracting;
  - community relationship management;
  - cultural heritage management;
  - social impact management.
- Potential contractors are required to show how they will manage their works and take into consideration the above matters and will work with the company in a coordinated effort to manage the Project's relationship with the community.
- Part of the communications about the Project will be about how indigenous business enterprises (and entrepreneurs) need to interact with the Project in relation to taking advantage

of business opportunities. It is expected that the NT-ICN and relevant Government agencies will participate in this communications activity.

- Opportunities to be involved and earn additional income through participation in communications activities with the Project, these may include cultural awareness training and participation in work associated with managing social impact, particularly during construction.
- The Proponent is committed to working with the communities in which it operates to support their social development and so it can be expected that over time, the company will become involved in a range of community development activities through its corporate partnerships programme.
- Through the studies undertaken for the Draft EIS, there is now a significant body of detailed scientific knowledge about the land within the traditional Aboriginal owners' estate and nearby areas that will be of significant use for the people of Wadeye in managing their land in the future. Traditional Aboriginal owners and other community members will be able to have access to this information and the supporting studies.
- There will be significant monetary and other benefits flowing to the traditional Aboriginal owners through the land agreement that is likely to have a multiplier effect in their communities.

The response to **OEH 60b** is addressed in **Section 6.4**.

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6. Draft EIS Section 3 Stakeholder Engagement

6.1 Section 3.1 Approach to Consultation

Stakeholder Engagement

NTG 4: It should be noted here that the proponents funded the NLC to carry out site protection surveys. The AAPA had no role with regard to these on-ground surveys. The NLC and the AAPA however, have agreed that Authority Certificates will be issued on the basis of NLC reports if they meet required standards specified by the AAPA.

NTG 4: Stipulate that the proponents funded the NLC to carry out site protection surveys and that the AAPA had no role in these.

It should be recognised that the Aboriginal Areas Protection Authority (AAPA) was consulted about the process that was to be undertaken in carrying out sacred site surveys and the detailed scopes of work proposed and that they issued Authority Certificates for the work to be undertaken. The reader is also directed to the response to **NTG 66a** (**Section 12.4**).

Stakeholder Engagement

NLC 11: Woodside states in this public Draft EIS document on page 35:

"With the exception of communities on Aboriginal land, all community consultation has been undertaken by Woodside. On Aboriginal land, consultation was controlled by the NLC. This has restricted the ability of Woodside to freely manage community consultation in these areas in accordance with the Woodside consultation methodology".

Woodside also advise on page 40 of the Draft EIS that it:

"will seek to establish direct relationships with the TOs so as to facilitate ongoing consultation in accordance with Woodside's consultation methodology".

The NLC considers that these statements ignore the fact that Woodside has a pecuniary interest in the land and this development. It also ignores the fact that Federal Parliament has decided it is in the public interest to have development proposals of this nature mediated by land councils on Aboriginal land.

On Page 44-45 Woodside advise that it will be implementing an indigenous consultation programme on the contents of the EIS. The NLC is conducting those consultations with Traditional Aboriginal owners & Thamarrur at Wadeye may conduct its own workshopping of the Draft EIS. Woodside has presented its EIS and will have opportunity to explain its position in the EIS Supplement in response to comments by the NLC and any other indigenous bodies.

Woodside advises at p12 of the Executive Summary to the Draft EIS that the project has adopted a three phase approach to potential social impact issues associated with the development of the Blacktip Project, that the first phase of the process involved an independent consultant compiling a Social Impact Assessment Report to assist Woodside in identifying potential social impacts in addition to providing valuable information to the statutory regulators responsible for overseeing the approvals processes and that the second phase of the process involves Woodside developing a comprehensive Social Impact Management Plan in close consultation with the affected community and other key stakeholder organisations. At p13 the Draft EIS goes on to advise that at the time the Draft EIS was finalised (October 2004), only the first phase had been completed, with the proposed Social Impact Workshop (an integral part of the development of the Social Impact Management Plan) tentatively scheduled for November 2004.

Prior to release of the Draft EIS the NLC had been advising Woodside that their proposed SIA Workshop and the proposed timing were inappropriate. Subsequently, traditional Aboriginal owners have advised the NLC that until such time as they have had opportunity to visit appropriate functioning gas plant(s) they can see no value in participating blind in SIA workshops and have no interest in doing so.

NLC 11: Clarify Woodside's position regarding the Social Impact Management Plan and consultation with the traditional Aboriginal owners.

Consultation Methodology: The Proponent has proposed a consultation methodology that is open, transparent and inclusive of all stakeholders.

The Proponent remains committed to undertaking appropriate consultation so that long term and mutually beneficial relationships can be developed with the communities in which we propose to operate. Consistent with its consultation methodology as outlined in the EIS, the Proponent is open to dialogue with the NLC, the NT Government and any other relevant stakeholders regarding consultation processes and methodologies that would be acceptable within the environmental approval process and that are consistent with the project schedule.

The Thamarrurr Regional Council has also initiated a process of consultation about development in their region generally and has prepared a scoping paper for discussion with key stakeholders, including the project and the NLC. The Proponent is prepared to participate in that dialogue.

Social Impact Management: The proposed methodology for undertaking social impact assessment and the development of a Social Impact Management Plan (SIMP) is three phased.

The first phase was to undertake a social impact study, which, among other things, was to provide baseline information and potential impacts, both negative and positive. This has been completed.

The second phase was to discuss the outcomes of the study with key community, non-government (e.g. NLC) and government stakeholders and workshop the issues raised so that a draft SIMP could be developed collaboratively. This process was proposed to key stakeholders in September and October 2004 but did not occur; however, further consultation was planned for the 1st to 2nd Quarter 2005, as agreed with the NLC in December 2004.

This has not occurred at the time of writing and so no second phase consultations have been undertaken with the traditional Aboriginal owners and broader community at Wadeye and in the Daly Region. However, information about the Blacktip Project through the project video and the EIS process has been available in the community since the 3rd Quarter 2004. Information about the Blacktip Project generally, has been in the community in video (in English and Kriol) and in written material since the 3rd Quarter 2003.

The lack of opportunity to consult with the relevant stakeholders has now precluded the development of an initial draft SIMP after direct consultation. The intention was to consult, develop possible mitigation strategies with key stakeholders and then consult again with the same stakeholders and others as necessary prior to finalising the SIMP, ahead of the FID.

Consequently, the project will develop a draft SIMP for consultation with relevant stakeholders. It is expected that after this consultation the SIMP will be amended prior to implementation during construction.

In the interim, during the week commencing 14 February 2005, a delegation of key traditional Aboriginal owners visited the Otway region of south west Victoria to visit a number of gas projects, i.e. BHP's Minerva plant, TXU's gas storage plant at Port Campbell and Woodside's Otway Project. The Proponent views this exercise as being a part of the overall consultation process.

There are two items which will be included in the draft SIMP but which need to be progressed prior to its finalisation, these are:

- communications;
- training and employment programme development.

The project will continue to pursue its efforts in these areas throughout the wet season and it is expected that a draft SIMP will be prepared by the end of the 1st Quarter 2005. The intent is to consult about the draft plan with a view to finalising strategies, work programmes, resources and contributions by FID.

The third phase is implementation of the SIMP which will be undertaken throughout the construction and operation phase of the project. A summary of how this will occur will be included in the draft SIMP.

The Proponent remains open to dialogue with the NLC, the NT Government and any other relevant stakeholders regarding consultation processes and methodologies that would be acceptable within the environmental approval process and that are consistent with the project schedule.

6.2 Section 3.2 Key Stakeholder Groups

NTG 6: How will the proponent provide feedback to key stakeholder groups on proposed control methods relating to any issues they have raised?

NTG 6: Indicate how the proponent will provide feedback to key stakeholder groups relating to any issues they have raised.

The Proponent will provide copies of the responses to each of the stakeholders who have raised concerns. The Proponent will also meet with those interested stakeholders to discuss the responses provided and present an update on the project.

6.2.1 Section 3.2.1 Indigenous Communities

NLC 28: Page 39. The EIS lists in Table 3.1 a summary of consultations that Woodside participated in on Aboriginal Land. The EIS does not record meetings attended by Woodside with key TOs and the NLC on Friday 3rd September where Woodside presented to TOs the first print of a video of their project in Murinbatha and English. At those meetings special conditions were placed on Woodside by the TOs of the proposed gas plant area for the conduct of its detailed engineering and surveying work in support of the project. Although this was a difficult meeting for Woodside as reflected in EIS statements over its intent to implement its own consultation methodology, it still stands as a record of Woodside opportunity to interface with TOs and could have been listed in the Table.

NLC 28: Note consultation with key traditional Aboriginal owners and the NLC on Friday 3rd September.

The Proponent acknowledges the meeting referred to and all those subsequent to that as being a part of the parallel processes of consultation about the project and negotiations about the land for the Blacktip Project pursuant to the ALRA.

NLC 30: Page 48-PW treatment and export. Comment is made on Woodside's proposal to dispose of hydrocarbon contaminated water offshore in the starting general comments in this document. TOs nor the NLC, until production of this EIS, were not adequately briefed on this means of disposing of PW. Woodside were requested by the NLC to address the option of onshore disposal in this EIS but the EIS fails to do so.

NLC 30: Traditional Aboriginal owners and the NLC were inadequately briefed on the proposed means of disposing of PW and request Woodside to address the option of onshore disposal.

The NLC and traditional Aboriginal owners are key stakeholders in the Blacktip Project development and have been more closely involved than any other stakeholder since the project's inception and have seen the various options and land requirements develop over time. Consultations regarding the various development options that have been considered have been undertaken with traditional Aboriginal owners and the NLC to the extent that details were known during their development.

The NLC were included in the project's internal review of the Draft EIS before its submission to Government and have been provided with relevant information as it has come to hand. The Proponent will continue to consult the NLC in relation to this and other matters raised by them in their submission.

PW disposal options are discussed in response to **NLC 53b** and **NLC 26** (**Section 14.8**).

Section 3.2.1 Indigenous Communities

NTG 5: With regard to sacred site clearances, again, the majority of consultative activities were carried out by the NLC.

NTG 5: Specify that with regard to sacred site clearances the majority of consultative activities were carried out by the NLC.

The reader is directed to the response to **NTG 66a** (**Section 12.4**).

6.3 Section 3.3 Communication Contacts & Tools

6.4 Section 3.3.1 Indigenous

NLC 29: Page 40. Woodside advise that it intends to implement its own consultation methodology with TOs and its intent to engage TOs in the development of Environmental Management Plans (EMPs). The NLC is responsible for developing the EMPs with TOs in consultation with Woodside. The NLC does not accept Woodside's consultation methodology and any suggestion in the Draft EIS that the NLC has accepted such is only in the view of the writers and not the NLC or the TOs.

On Page 44-45 Woodside advise that it will be implementing an indigenous consultation programme on the contents of the EIS. The NLC is conducting those consultations with Traditional Aboriginal owners & Thamarrur at Wadeye will be conducting its own workshopping of the Draft EIS. Woodside has presented its EIS and will have opportunity to explain its position in the EIS Supplement in response to comments by the NLC and any other indigenous bodies.

NLC 29: Address conflicts between Woodside's consultation methodology and NLC responsibilities.

Environmental Management Plan (EMP): The Proponent does not accept that it is the NLC's responsibility to develop EMPs. The Proponent believes that it is the Proponent's responsibility to draft EMPs, as it will be accountable for their implementation. The Proponent also believes that it is solely the responsibility of government to approve EMPs, considering submissions made to it during the public comment period on the Draft EIS. The Proponent believes that it is the responsibility of the NLC to facilitate consultation about them with traditional Aboriginal owners and potentially affected communities, as defined in the ALRA.

Consultation: The Proponent will consult with the NLC as a key stakeholder in relation to the development of the EMPs that are submitted to the NT Government for approval and will give due consideration to those consultations.

The NLC statement relating to consultations about the EIS supports the concern raised by the proponent in the Draft EIS (refer to **Section 3.1, Volume 1**). However, the Proponent remains committed to consultations with key stakeholders, including the NLC generally and in relation to the development of the EMPs that are submitted to the NT Government for approval and will give due consideration to those consultations.

NTG 7: Development of a communication strategy appropriate for the project stakeholders should be considered. This strategy could address issues such as the following:

"The proponent plans to form direct consultative relationships with traditional owners. Presently, the Northern Land Council (NLC) facilitates the majority of consultation. Criteria for engagement through the NLC as opposed to direct contact with traditional owners should be formalised to minimise potential jurisdictional conflict."

NTG 7: Develop a communication strategy appropriate for the project stakeholders, including formalising relationship with the Northern Land Council (NLC).

The Proponent's consultation methodology includes a communications strategy as outlined in the EIS. The draft SIMP currently under preparation will detail the proposed medium to long term communications strategy and this can be included in the subsequent dialogue with all stakeholders that is proposed.

OEH 60b: Given approval, construction would commence in the short term and currently there is no apparent strategy in place to train and employ local indigenous people for the project. Include in the Supplement how management of this project will take into account the wishes of the Traditional Owners including plans to involve them in the development of EMPs (Section 3.3.1).

OEH 60b: Specify Woodside's management strategy to take into account the wishes of the traditional Aboriginal owners, including plans to involve them in the development.

The Proponent has appointed the NLC's TEU in collaboration with the TCA on a short term consultancy to develop a training and employment programme for the project. It is expected that this will be completed by end March 2005 and that subject to project approvals being achieved, training and employment of indigenous people would commence in May or June 2005, subject to FID. Training and employment outcomes would be dependent upon individual skills, qualifications and desire to obtain employment.

The Proponent is also liaising with the NT DEET in relation to labour market analysis.

The Proponent will continue to consult with the NLC and the traditional Aboriginal owners in relation to the development of EMPs. The Proponent will consult with the NLC as a key stakeholder in relation to the development of the EMPs (in particular, the SIMP), that are submitted to the NT Government for approval and will give due consideration to those consultations.