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e: [REDACTED]
w: [REDACTED]

29th July, 2024

NOPSEMA
GPO Box 2568
PERTH WA 6001

Via Email: communications@nopsema.gov.au, environment@nopsema.gov.au

To Whom it may concern,

TGS OTWAY BASIN 3D MULTI CLIENT MARINE SEISMIC BLASTING ENVIRONMENT PLAN
NEW GUIDELINE FOR MANAGING IMPACTS TO UNDERWATER CULTURAL HERITAGE

In addition to the letter we sent you on Friday (26th July), we write regarding the new [REDACTED] Guideline, 'Assessing and Managing Impacts to Underwater Cultural Heritage in Australian Waters' dated June 2024, which appeared in a news announcement on the [NOPSEMA website](#) on 26 July 2024.

There is no reference made to this new guideline in chapter 10 of the TGS Environment Plan which covers aboriginal cultural heritage. Similarly, there is no reference made to the Underwater Cultural Heritage Act 2018.

The guideline discusses managing physical cultural heritage which could be protected and the requirement to alter the project to ensure its protection.

The guideline also discusses managing intangible cultural heritage. Whilst we do not wish to speak for first nations people, intangible cultural heritage could mean connection to sea country, the marine environment, marine species, song lines and whale dreaming and it is imperative that there be genuine extensive face to face consultation with affected first nations peoples before this project proceeds any further. The guideline discusses modification of the TGS project to prevent impacts to intangible cultural heritage.

The guideline also discusses the requirement that a highly experienced underwater archaeologist could be engaged to assess the proposed project footprint for underwater cultural heritage. This does not appear to have taken place.

The NOPSEMA news announcement recommends that titleholders consult with [REDACTED] with regard to underwater cultural heritage, however, the EP does not appear to make mention that this has happened.

We ask that the TGS Environment Plan be rejected because the new guideline has not been considered, appropriate archaeological studies do not appear to have been carried out and genuine extensive face to face consultation with affected first nations peoples has not taken place.

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We look forward to receiving your response to the above, along with responses and answers to the questions in our letter from last Friday.

Yours Sincerely,

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Find us on [Redacted]

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