Submission on the referral

Verdant Minerals Ltd - Ammaroo Ammonium Phosphate Fertiliser Project

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

Government authority: Northern Territory Police, Fire and Emergency Services

Summary: The Ammaroo Ammonium Phosphate Fertiliser Project proposal is likely to have significant impacts for the provision of emergency services and responses to fire, rescue and emergency events. Due to the proposed increased infrastructure and facility development, major hazard storage facility, airfield, and greater use of the Darwin Port facilities for shipping and storage, the NTFRS has extremely limited capacity or capability to respond to hazardous materials or Chemical, Biological, Radiological and Nuclear CBRN incidents occurring on or off-site.

Section of Referral	Theme or issue	Comment
Ammaroo Ammonium Phosphate Fertiliser Project Referral for Significant Variation – Table E2	Preliminary potential impacts.	The Northern Territory (NT) Fire and Rescue Service (NTFRS) is established pursuant to the Fire and Emergency Act 1996 (the Act) which makes provision for the operational and emergency response activities of the NTFRS for the protection of life, property and the environment against fires and other emergencies.
	EPA factor – Communities and economy	The NTFRS is responsible for the majority of the NT's population who reside in the larger populated cities and towns within gazetted Emergency Response Areas (ERAs) as well as transport corridors throughout the NT in respect to road crash rescue and hazardous materials response.
		The proposal does not adequately describe the potential impacts on NTFRS to respond to increased fire and emergency incidents arising from the proposed changes to other infrastructure and facilities on and off-site, or in the event of road, rail, Chemical, biological, radiological and nuclear (CBRN), or marine incidents while transporting hazardous materials along the NT's road and rail corridors or waters.
		The NTFRS has extremely limited capacity and capability to respond to hazardous materials or CBRN incidents occurring along road and rail corridors and within the Darwin Port. Additionally, the NTFRS does not possess marine firefighting or shipboard response capability, in the event a hazardous materials or fire incident occurs in NT waters. The NTFRS responses to incidents within the Darwin Port would require diverting resources from Palmerston, Berrimah or Darwin ERAs to respond and place the community at risk in the event multiple emergency incidents occur. It should be noted that some locations of infrastructure and access locations established within the Darwin Port fall outside the optimal response time of 8 minutes from the Palmerston ERA.
		The two closest NTFRS response capabilities to the project site is the Tennant Creek fire station (approximately 220km northwest) and Ti Tree Volunteer Fire and Emergency Response Group (FERG) (approximately 190km southwest). The Ti Tree Volunteer FERG have no capacity or capability to respond to hazardous materials or CBRN incidents and the Tennant Creek fire station has extremely limited capacity and capability to respond to incidents of that nature occurring along road and rail corridors on and off the project site.

Environmental impact assessment under the Environment Protection Act 2019

Development of the proposed airfield at the project site, with a capability to land twin engine jet aircraft and accommodating up to 200 passengers and freight should also have regard for options for dedicated fit for purpose resources and emergency response
infrastructure to rescue people and protect property from an aircraft crash or fire and other emergencies at the airfield. The two closest NTFRS locations have extremely limited capacity and capability to respond to an airfield emergency at the project site.