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Dr Paul Vogel Chairperson Northern Territory Environment Protection Authority

6th November 2020

Dear Dr Vogel

Re: Review of Seabed Mining in the Northern Territory - Environmental Impacts and Management. Draft report

Thank you for the opportunity to comment on the NTEPA Draft Review of seabed mining in the Northern Territory.

Tucked away in the south-west corner of the Gulf of Carpentaria and overlooking Limmen Bight, Lorella Springs is one of Australia's most remote coastal areas.

My family and I first arrived in the Limmen Bight region in the mid-1980s to run Lorella Springs as a cattle station. Today, ecotourism is our focus in what is now the 4,000km² Lorella Springs Wilderness Park. This is a natural paradise larger in area than the greater Darwin region.

Lorella Springs has been described as 'in the middle of nowhere'. But for those of us who live here, it is in the centre of somewhere very special, a sanctuary in a coastal wilderness. From its wild gulf coastline, to hundreds of kilometres of freshwater creeks, estuaries and rivers, thick scrub, open savannah, swamps, billabongs and lagoons, and inland to rocky mountainous country with remote escarpments and hidden springs, it is abundant with life.

The region's remoteness, cultural richness and its diverse, rugged and beautiful landscapes, are what attracts more than 10,000 visitors to our wilderness park each year to camp, hike, birdwatch, fish or just escape to the great outdoors. They can gaze across the vast intertidal flats covered in migratory shorebirds, walk along unspoilt beaches where turtles are nesting, glimpse dugongs feeding on seagrass meadows and swim in hot springs.

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Our guests describe Lorella Springs as 'such an amazing place', 'a pristine paradise' that is 'stunning' with 'so many beautiful spots' and 'amazing billabongs and hot and cold waterholes'.

Many visitors return, while some wish they could stay for longer; all want to see the region protected. When a road was illegally carved through the park by a mining company a few years back, our visitors were shocked that the desecration could occur in such a beautiful place.

Lorella Springs is a long way from the cities and towns of Australia but nowhere appears too remote for seabed miners. And if they come, we can expect more roads through the wilderness.

There is currently an application to conduct seabed mining along the coastal area stretching the 27-kilometre length of the Lorella Springs Wilderness Park. Although the draft management plan for Limmen Bight Marine Park commits to ban seabed mining, it won't be enacted until March 2021 when the existing Moratorium comes to an end. If and when the marine park is designated a 'reserve' under the *NT Minerals Act*, it can be undone anytime at the stroke of a pen as it is at the discretion of the Resources Minister of the day. This demonstrates that our coasts are not safe from seabed mining until it is banned. The mining application also covers a much larger area than the Limmen bight Marine Park and this area remains at risk even if the marine park becomes a 'reserve from mining'.

The scheduled end of the Northern Territory's seabed mining moratorium is fast approaching. The Gulf of Carpentaria, Limmen Bight and many other areas along the Top End coastline are now at risk.

I am deeply worried about the damage that seabed mining would do to this precious place, for the fish, the turtles and dugongs, and for the region's Indigenous culture. I also worry that tourists will no longer want to come.

Seabed mining would bulldoze and rip apart the seagrass meadows and intertidal flats of Limmen Bight, and land-based infrastructure such as wharves, roads and processing plants would replace coastal wetlands, mangroves, rainforest and saltpans.

The tidal range in Limmen Bight ranges from 2-4 metres, creating vast mudflats and sandflats on the gently sloping seabed. Every year the flats are covered in migratory shorebirds that include the red knot, great knot, red-necked stint, red-capped plover, lesser and greater sand plovers and the grey-tailed tattler. They have flown here all the way from the Northern Hemisphere and rest and feed here in this critical refuge before returning north. Most are threatened because their habitats have been degraded or have disappeared along their flight path.

Migratory shorebirds are some of the more than 180 bird species that we have identified at Lorella Springs over the past 20 years. It is no wonder that the area has been declared an *Important Bird and Biodiversity Area* by Birdlife International.

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Close to 40 species of waterbirds, such as the black-winged stilt, magpie goose, red-necked avocet, Australian pelican, glossy ibis, grey teal and four egret species rely on the coastal wetlands between the Limmen and Roper Rivers. Colonies of the little, black-naped and roseate terns, and pied cormorants and pied oystercatchers are found on offshore islands, and they all search the waters of Limmen Bight for food. Ospreys and white-bellied sea-eagles also breed on the islands.

The seagrass meadows in Limmen Bight are critical habitat for dugongs, Australian snubfin, bottlenose and Indo-Pacific humpback dolphins and flatback, green, hawksbill and olive ridley marine turtles. Limmen Bight Region supports the Territory's largest population of dugongs. The main threats for dugongs and marine turtles are habitat loss and entanglement in operational and discarded fishing gear. Seabed mining operations would add significantly to those threats.

More than 100 fish species have been recorded in the estuarine, seagrass meadows and marine areas of Limmen Bight. These include at least three species of pipefish, the large-toothed sawfish, the bull shark and the freshwater whip ray. The mangroves lining the estuaries are an important nursery for commercially and recreationally targeted fish and home to the much-prized barramundi.

Limmen Bight is iconic for recreational fishers and they come here to catch barramundi in the Roper and Limmen Rivers and their estuaries, mud crabs on the mudflats, and reef fish and prawns offshore. As well as catching fish, they come to interact with this wonderful natural environment and its near-pristine waters and have an adventure in one of Australia's remotest locations. They are also very happy to help us protect this unique environment by following our strict catch and release policy (only taking what they intend on eating that night).

With marine and coastal tourism being such an important driver of the Northern Territory economy, and with the number of domestic and international tourists visiting remote locations, like Lorella Springs Wilderness Park, on the rise, it is very disappointing that the Draft Review has paid such little attention to the impacts of seabed mining on Top End tourism. I would urge the NTEPA to ensure that the Final Review covers these issues in far greater detail.

The ecotourism lifeblood will be drained from this regional community if seabed mining is allowed in the Top End's coasts and seas. Lorella Springs, Limmen Bight and the Top End coasts are too important to lose, not just for me, my family and our livelihood, but also for Territorians, Australians and the world.

Yours sincerely,

Rhett Walker and family

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