



NT Environmental Protection Authority

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Comments on Draft Guideline: Identification of significant effects on the environment.

Rural Residents' Rights Group Incorporated endorses the EPBC Act National Environmental Significance Guidelines. The NT's bilateral agreement with the Federal government under the EPBC Act should only be enabled if a similar definition or paragraphs defining 'significant effect' are used in NT environmental protection laws and subsidiary regulations and incorporated legislative instruments.

Guidelines for matters of national environmental significance clearly define what 'environmentally significant' national actions are:

https://www.environment.gov.au/system/files/resources/42f84df4-720b-4dcf-b262-48679a3aba58/files/nes-guidelines_1.pdf .

NT Environmental Assessment Guidelines for significant environmental impacts or consequences of effects should follow these. As 'effect' is a statistical or economic term, it is inappropriate for cumulative processes of environmental impacts.

An example of methods to identify significant impacts or consequences of effects could be as follows (after due recognition of the original NES guidelines):

What is significant impact?

A 'significant effect' is a process or consequence of action or failure to act when the context or intensity of potential to change is important, notable, or of consequence.

Whether or not an action or failure to act is likely to have a significant effect depends upon the sensitivity, value, and quality of the environment which is likely to be impacted, and upon the intensity, duration, magnitude and geographic extent of any impact or effect.

When is a significant impact likely?

To be 'likely', it is not necessary for a significant effect to have a greater than 50% chance of happening; it is sufficient if a significant consequence of action or inaction on the environment is a real or not remote chance or possibility.

If there is scientific uncertainty about the impacts of an action or failure to act and potential impacts are serious or irreversible, the precautionary principle is applicable.

Accordingly, a lack of scientific certainty about the potential impacts of an action or inaction will not itself justify a decision that the action is not likely to have a significant effect on the environment.

The draft EA guidelines are still linear in context. The current EAA is inappropriate to prevent or make matters of environmental significance in the NT less harmful.



Such terms as 'man' should be changed to 'human species' or 'humanity' in keeping with a balanced scientific perspective of ecological sustainability. There is no such thing as certainty in nature and this is recognised in integrated environmental legislations in other jurisdictions.

Climate change must also come into the equation. The 80:20 environment/human use water resources ratio should also become part of a new integrated NT Environmental Protection Act.

Linear concepts of Business-As-Usual are not appropriate or sustainable in a finite natural environment. We only have one green planet to live with and it is clearly showing signs of rebelling against 'Man-made' excesses. Human-related business interests must recognise the precautionary principle and its significance.

In conclusion, the Environmental Assessment Act, future NT integrated environmental protection and native vegetation laws in the NT cannot water-down the significant effect of protecting a finite environment against non-sustainable, exponential growth effects of laissez-fair economic theories.

Environmentally-ethical economical theory in a multifaceted world of change should also reflect how societies practise living healthily.

Foremost, as another species in a struggling world of declining species, the human species must show more understanding of the inherent right of all living things to take an equal but different part in balancing the health of the world against narrow human business interests.

We're all in it together and the healthy future of the world depends on strong environmental biodiversity protection along with our humanely significant environmental actions now.

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(on behalf of members).