

Submission Form for Comments and Feedback

NT EPA Draft Environmental Guidelines

Submissions close: Monday 15 July 2013, 5pm

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| <p>Your comments will be publicly available.</p> <p>Mark the box here <input type="checkbox"/> if you do not want your comments to be made publicly available.</p> <p>Mark the box here <input type="checkbox"/> if you do not want your identity to be made publicly available.</p> | | | |

| Guideline Name | Section / Page of Draft Guideline | Comment |
|---|-----------------------------------|---|
| Guidelines for Disposal of Waste by incineration | 3.3.4 | Need to see terminology/text around ‘Any buffer distance ...’ strengthen to ensure it covers long term arrangements and not just those ‘ <i>at the time of the application for an operational permit</i> ’. |
| Guideline on Environmental Offsets and Associated Approval Conditions | 1 | <p>Strengthen ‘Social license to operate’ to be ‘Requirements to Operate’. This would be more in keeping with other States and Commonwealth.</p> <p>Off-sets should be imposed as a condition of approve for a project and should reflect the size and scale of area being disrupted. Further, the off-set should be in a contiguous area and not in disparate and broken lots within the total area being offered – as it has been</p> |

Please complete the form and send it via one of the following by no later than *Monday 15 July 2013, 5pm*:

Email: NTEPA.Consult@nt.gov.au

Post: NT EPA, GPO Box 3675, Darwin NT, 0801

Privacy: Your personal information will be used for the purpose of collecting and collating comments received on the NT EPA draft guidelines. The NT EPA is subject to the *Information Act* and its Regulations. Information will not be disclosed to a third party, unless required by law or otherwise stated.

NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

| Guideline Name | Section / Page of Draft Guideline | Comment |
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| | | <p>learnt from other examples that broken lots become weakened and often have dieback and ultimately sustain big losses and depletion. Many ending up as much less than the area initially required as the Off-Set.</p> <p>We do not subscribe to the notion in the Guidelines that “The highly inflexible requirement for an off-set can be implemented with a level of flexibility’ for the reasons stated above.</p> |
| Guidelines for Assessment of Impacts on Terrestrial Biodiversity | <p>1</p> <p>4</p> | <p>The Northern Territory has been subject to a relatively high rate of extinction of biodiversity. Our comments in the section above ‘Guideline on Environmental Offsets and Associated Approval Conditions’ need to be seen as part of the extinction of biodiversity and taken into account and linked to Guidelines for Assessment of Impacts on Terrestrial Biodiversity. This is a good opportunity to lessen the Silo response to each Guideline but rather link some of the issues as relevant to one or two Guidelines</p> <p>The Marine Pollution Act as legislation used in developing the Guidelines needs to receive greater prominent focus given the increase in developments and traffic anticipated for Darwin Harbour.</p> <p>Under the guidelines <i>Marine</i> Assessment should be provided with more attention under Objectives, Information Requirements than it is currently by providing more text around water and planning.</p> |

| General comments |
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| <p>The City of Palmerston thanks NT EPA for the opportunity to comment on the recent release of Draft Guidelines on a range of functions EPA now undertakes. Congratulations are also extended to the breadth of cover that is related through the content within the eleven Draft Guidelines submitted for public comment. So much now covers off previous concerns of lack of detail that was to be met for required approvals and more adequately reflects requirements that have to be met within other State, Territory and National jurisdictions.</p> <p>Council has a few comments on individual DRAFT Guidelines and those comments are given above.</p> <p>Additionally and of importance Council wishes to convey four matters relevant to Palmerston.</p> <ul style="list-style-type: none"> • The Closure of the City Landfill means that all Kerbside Waste is now delivered to Shoal Bay Landfill in the City of Darwin. The site at |

General comments

Archer is awaiting final NT EPA approval but this should be forthcoming shortly. The City of Palmerston has a Waste Transfer Station at the Archer - Lot 4302 Elrundie Avenue - which deals with Recycle goods and Green Waste only.

- Water quality at Palmerston end of the Harbour has received 'good quality – 'A' status - from the Darwin Harbour Health Cards.
- Council is committed to supporting environmental protection and water quality through Council comments on development applications, planning scheme amendments and land use planning. This is a critical and time consuming area for Council given the number of new suburbs and schools being developed by the Northern Territory Government in the Palmerston region.
- Council continues to develop its response to Water Quality Protection by means of developing a social response much along the lines of 'conservation of waterway environments now will ensure that the greatest number of people can make maximum use of them in the future'.

Council looks forward to greater clarity of NT EPA and Local Government responsibilities to more readily provide residents with the 'who to contact' for various matters requiring attention and to know who will take the lead role in the response required.

[Click here and press the TAB key to add extra rows to this table.](#)