

Mr Rod Johnson
Department of Environment, Parks and Water Security
GPO Box 3675
DARWIN NT 0801

Dear Mr Johnson,

Re: Additional information to SER - Mandorah Marine Facilities

The Department of Environment, Parks and Water Security (DEPWS) has assessed the information contained in the above application and provides the following comments:

Flora and Fauna Division

The Flora and Fauna Division has reviewed the proponent's response to the request by the Northern Territory Environment Protection Agency for further information to the Supplementary Environmental Report (SER). The Flora and Fauna Division considers the response inadequate. The proponent has dismissed the request for further information by referring to existing text within the Referral and SER, without addressing the Flora and Fauna Divisions' concerns around these particular sections of the documents and inadequacies raised in our previous comment.

In particular the proponent has not addressed the impacts from project activities to seagrass communities along the western coastline of Darwin Harbour and potential reliance of Dugong on these seagrass meadows. Nor has it addressed the repeated request to fully assess the long-term impacts from constructing the Mandorah Harbour to coastal processes along the western coastline of Darwin Harbour. The proponent even argues that these long-term impacts are beyond a normal Environmental Impact Assessment for a construction activity.

The Flora and Fauna Division has recommended that potential impacts can be managed through an appropriately designed monitoring program within the Construction Environmental Management Plan (CEMP) and a Long-term Monitoring Program of at least 20 years. However, the proponent has chosen not to include suggested recommendations and is unwilling to amend the CEMP and Long-term Monitoring Program.

As such, the Flora and Fauna Division considers that appropriate requirements could be conditioned in an approval, and should include:

- (i) Dedicated seagrass condition and resilience monitoring program for seagrass meadows at Woods Inlet, Mandorah and a seagrass meadow between West Point and Charles Point, for a twenty year period. This project should reside under the Integrated Research and Monitoring Program (IRMP).
- (ii) That the proponent contributes to a Darwin Harbour wide Sediment Transport Model.

These activities could most effectively be implemented as part of the Darwin Harbour Integrated Marine Monitoring and Research Program (IMMRP).

Should you have any further queries regarding these comments, please contact the Development Coordination Branch by email DevelopmentAssessment.DEPWS@nt.gov.au or phone (08) 8999 4446.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'M Wauchope', written in a cursive style.

Maria Wauchope
Executive Director Rangelands

5 July 2023