

Submission on the referral

Energy North Pty Ltd – Project Ares

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

Government authority: Department of Health, Health Protection, Environmental Health Strategy

Summary: Health Protection, Environmental health administers the *Food Act 2004* and the *Public and Environmental health Act 2011* and this submission is a broad environmental report that does not address the legislative requirements.

Section of Referral	Theme or issue	Comment
Referral Report - EcOz Environmental Consultants on behalf of Energy North Pty Ltd	<i>Food Act 2004, Public and Environmental health Act 2011</i>	- The submission refers to the prospective proponent to commission and run the worker's camp. The associated registrations, fit out of facilities and overall management according to the <i>Public and Environmental health Act 2011</i> and the <i>Food Act 2004</i> has not been considered in the report. During the construction phase the project will have the largest onsite FTE however considerations under these acts have not been detailed including reference to the Ensure compliance with the <i>Food Act 2004</i> including registration of any food business, where food and meals are provided to workers. - The sewage processing unit (SPU) servicing the workers camp needs to meet the requirements of the Code of Practice for wastewater management and the Public and Environmental Health Regulations 2014 Part 6. - Any water supply sourced from bores to be used for drinking and potable use, should be managed in accordance with the Guidelines for private water supplies. - The Northern Territory Food Act was also not listed in the approvals register so inclusion in this register is required as well as further detail to ensure legislation is adhered to in all aspects of the project. - The report states that groundwater extraction and water usage calculations are for closed loop cooling systems within the proposed facility. This does not detail the operational water use required for the 4500 staff during construction phase and the maximum staffing levels of 500 people during operations. Submissions will require proposed associated wastewater, water supply, treatment, storage and reticulation infrastructure as well as impact and recharge details of the aquifer in adherence to the relevant legislation. Excessive draw down on aquifers can put water security and water safety at risk for nearby communities as well as affect the ability to rehabilitate post project. Further detail is required. - This major project will potentially create significant waste from numerous waste streams (liquid, solid, putrescible, hazardous, radioactive, air quality, recyclable). Management of these streams is a major consideration as any reliance on existing township waste facility or service is not viable on such a large scale. Further detail as to how all waste streams will be managed is required. Please refer to the following webpage for further information on Health requirements for mining and construction camps webpage.