

As a Territory resident, teacher, a birdwatcher, a parent and a scientist, based in Millner, I am writing to object to the proposed Project Ares data centre and gas power station at Murrnaji Station.

Lake Woods lies downstream of this project, in the same catchment, and supports enormous numbers of waterbirds and migratory shorebirds. Nothing in the referral examines what the project's runoff and creek crossings would do to it. I oppose this unless the NT EPA requires assessment of the project's impacts on Lake Woods and the creeks that feed it.

I've visited and studied Lake Woods with the students of Elliot and it is a wonderful tourist and local recreational amenity for the community to cool off and swim and for cultural practices. It is a wonderful place to view birds. This matters to me because the community of Elliot and other common cities in the region are culturally connected to this special place. It is of local, national and global importance for migratory birds.

A gas power station of around 1,000 MW would be built to run this data centre, larger than the Territory's biggest existing station. Where its gas would come from is left unstated, but in this part of the NT that means fracking the Beetaloo. I am totally opposed to fracking in the NT and this project is assuming it will have access to fracked gas from the Beetaloo. Fracking will have the same negative environmental impacts as Ares on water, wildlife, culture, communities and most importantly carbon and climate change. The project should not be signed off until the NT EPA requires that the source of the gas be disclosed and its full lifecycle emissions assessed, including the upstream fracking.

The Greater Bilby, a Vulnerable species and an Australian icon, is confirmed on the site, and the Grey Falcon and Yellow-spotted Monitor are expected here too. Yet the surveys so far are desktop-only and cover only part of the site. Australia must protect endangered species habitat. We are breeding endangered wildlife in captivity to re stock the natural environment so we must not destroy more habitat with endangered species. I object unless the NT EPA requires field surveys for these threatened species across the whole project footprint before any decision on impacts.

Up to 4 billion litres a year would be drawn from the Cambrian Limestone Aquifer for this one project, a large share of the region's allocation, on top of the demands of cotton, petroleum and a co-located ammonia plant on the same water. Water in a managed arid region is precious. A recent high court decision to stop water licensing allocation for Singleton station was stopped recognising that this water can be overused with disastrous consequences. The region which permits drawing down stored groundwater over decades, on the assumption that recharge is minimal and little depends on the water. But the same aquifer is a living, connected karst system with its own unique fauna, feeds springs, and underpins the Lake Woods catchment. The project's eastern works cross the very creeks that flow to the lake and the referral does not assess that downstream effect. The project should not be signed off until the NT EPA requires a full, cumulative assessment of whether this level of groundwater extraction is sustainable before any approval.

The project depends on an off-site gas pipeline and shares water and infrastructure with a separate ammonia project, yet these are being treated as separate matters. All aspects of the project need to be assessed,. I oppose this unless the NT EPA requires that the whole project and its connected parts, including the gas pipeline and the ammonia plant, be assessed together rather than piece by piece.

So far the environmental work is mostly desk research, done without surveying the creek lines or the country downstream in the seasons when it matters. The project area, and the catchment downstream of it, are home to threatened and migratory wildlife, much of it in country the ecology report never surveyed. More survey work is required. This must not be approved until the NT EPA requires field surveys across the full project footprint, in appropriate seasons, before the scope and level of assessment are locked in.

Up to 19,150 hectares, a footprint about 14 km across, could be cleared or disturbed under what is proposed. No amount of land clearing is acceptable in a region with threatened species and

with climate change. What the proponent frames as degraded pastoral land is living Bilby country. Source: EPBC Referral 03507 (Attachment 3. The project should not be signed off until the NT EPA requires that the assessment be carried out against the full maximum footprint, with any later reduction made a binding condition of approval rather than an assumption.

This is determined native title country with significant cultural heritage, and the engagement needed to understand it has hardly started. The cultural heritage of this place is highly significant to the community of Elliot and other communities that rely on Lake Woods for cultural practises, recreation and fresh water. I object unless the NT EPA requires that cultural heritage assessment be led with Traditional Owners through the Northern Land Council, properly resourced, and not rushed by a streamlined timeline.

I do not believe this project should be approved until these matters are fully and independently assessed. I call on the NT EPA to require them in the Terms of Reference before any decision is made. Thank you for considering my submission.

Christine Cox

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