

Submission Form for Comments and Feedback**NT EPA Draft Environmental Guidelines***Submissions close: Monday 15 July 2013, 5pm*

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| Guideline Name | Section / Page of Draft Guideline | Comment |
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| Environmental Offsets and Associated Approval Conditions | S6/p6 Guidelines for Integrating... | Commonwealth and Northern Territory legislation already covers Environmental Impact Assessments and regulates assessment, approval and the imposition of offsets that allow projects to proceed. Local government is acknowledged as a stakeholder to be consulted during the assessment process in regard to "community aspirations". |
| Preparation of an Economic and Social Impact Assessment | S6/p3 Social Assessment | While the section does note that "consultation with and involvement of the community" should be the basis of the assessment, it does not mention local government specifically. The list of stakeholders does include residents, landholders and service providers but, given the possibility of disruption to the amenity (safety, access etc.) of council services and |

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

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NORTHERN TERRITORY ENVIRONMENT PROTECTION AUTHORITY

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| | | <p>potential impact on ratepayers, it would be appropriate for local governments to be specifically included in the assessment process.</p> <p>The <i>NT Local Government Act</i> Part 2.3, section 11 notes that the principal role of a council is to act as a representative, informed and responsible decision-maker in the interests of its constituency.</p> <p>In addition, the Minister for Lands, Planning and the Environment, the Hon Peter Chandler, has recently asked the Local Government Association of the Northern Territory (LGANT) to prepare a submission to guide the formation of an NT Waste Management Committee. A governance charter has been drafted in consultation with the Department of Lands, Planning and the Environment and the NT Environment Protection Authority (NTEPA).</p> <p>It is expected that the formation of this committee, if it proceeds, would improve communication between the NTEPA and the local government sector with regard to the management of waste and pollution.</p> |
| Disposal of Waste by Incineration | S3.3/p10 Northern Territory Legislation and Guidelines S3.3.1/p10 Waste Management and Pollution | <p>The guidelines aim to define the legislative framework which will underpin the approval and regulation of waste incinerators in the Northern Territory. This guideline incorporates International and Australian requirements for the incineration of clinical and related waste facilities.</p> <p>While there is obvious need for regulation of the operation of large scale commercial incinerators in urban areas, it would also be appropriate to provide a guideline more specific to the burning of waste in remote areas.</p> <p>It has been common for residents and some community organisations, such as health services, to allow plastics and other toxic materials to be burnt off in rubbish bins (44 gallon drums) or for councils to burn off waste at community rubbish dumps. While informal guidelines have been in place since 2009 (see below for an example), these have not been formally endorsed by the NTEPA.</p> <p>Under the <i>Northern Territory Waste Management and Pollution Control Act</i>, communities with populations over 1000 are required to have a licensed landfill and an Environmental</p> |

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| | | <p>Management Plan for the operation of their waste disposal sites.</p> <p>For communities with populations below 1000 people, local governments operate under guidelines which were developed as part of the Northern Territory Government Program 'Re-Thinking Waste' – Waste Management Standards for Local Government in the Northern Territory.</p> <p>These guidelines were prepared by LGANT with support from the Re-Thinking Waste Program jointly funded by the former Department of Natural Resources, Environment, The Arts and Sport (NRETAS) and the Packaging Stewardship Forum in 2009.</p> <p>While there are presently no waste incinerators as such in these smaller communities, controlled burning of household waste does occur, usually at a 'separated' waste facility. The Reduction of Hazard section, Guideline 1.05 <i>Burning of Waste</i> states that:</p> <p><i>Burning wastes changes otherwise safe materials (such as plastic) into dangerous toxic emissions and ash, including: dioxins; sulphur dioxide; lead; and mercury which may adversely impact on public health and the environment. Toxic emissions can cause immediate and long-term damage to the lungs, kidneys, liver, nervous system, and reproductive or developmental disorders. The damage is especially a problem for children, the elderly, and those with pre-existing respiratory conditions. Children can also accidentally swallow contaminated dirt on their hands while playing near discarded ash.</i></p> <p><i>Open burning of household waste creates significant amounts of dioxins due to the low combustion temperatures, poor air distribution, and the presence of chlorine, which is found in almost all household waste components. The products of incomplete combustion will include dioxins, furans and other potentially carcinogenic (cancer-causing) organic compounds. Although some of these compounds will be carried off into the atmosphere with the smoke plume, some will remain in the ash left behind after the fire has gone out.</i></p> <p><i>It is important to educate the community these dangers of backyard burning. It is also important to provide alternatives to rubbish burning by establishing solid waste collection programs and encouraging community members to compost and reduce, reuse, and recycle.</i></p> |
| Conceptual Site Models | | <p>This guideline aims to assist industry in developing a conceptual site model for the purposes of a licence or approval issued under section 74 of the <i>Water Act</i> or Part 5 of the <i>Waste Management and Pollution Control Act</i>. It aims to summarise pertinent information about the</p> |

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| | | <p>history of use and activities on a site and surrounding properties, including potentially contaminating activities and land uses.</p> <p>It will provide a useful guide to local governments and provide an accepted format for the presentation of site specific information.</p> |
| Environmental Assessment-Acid and metalliferous drainage | | This guideline relates specifically to mining and mineral processing and is of little relevance to local government activities other than in regard road construction and maintenance and in creation of landfill sites. |
| Marine Dredging | | Noted, not applicable to local government. |
| Land clearing proposals under <i>Pastoral Lands Act</i> | | Noted, not applicable to local government. |
| Development proposals under the <i>Planning Act</i> | Attachment A/p8 | Attachment A (point 5, page 8) requires that proposals are assessed for their impacts on transport and infrastructure to the satisfaction of "relevant NT Government agencies". It is suggested that this also include reference to local government. |
| Mining exploration or production proposals under the <i>Mining Management Act</i> | | Noted, not applicable to local government. |
| Onshore petroleum exploration or production proposals under the <i>Petroleum Act</i> | Attachment A/p8 | Attachment A (point 3, page 8) requires that proposals are assessed for "significant impacts on infrastructure or traffic" to the satisfaction of "responsible agencies". It is suggested that this also include reference to local government. |
| Impacts on Biodiversity | | Noted, not applicable to local government. |

| General comments | |
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| <p>NT Waste Management Committee</p> <p>The Minister for Lands, Planning and the Environment, the Hon Peter Chandler, has recently asked LGANT to prepare a submission to guide the formation of a NT Waste Management Committee. A governance charter has been drafted in consultation with the Department of Lands, Planning and the Environment and the NTEPA.</p> <p>It is expected that the formation of this committee, should it proceed, would improve communication between the NTEPA and the local government sector with regard to the management of waste and pollution and ensure that many of the issues noted above would be considered as a matter of course.</p> | <p>Endorsement of Guidelines for Waste Management in Smaller communities</p> <p>For communities with populations below 1000 people, local governments operate under guidelines which were developed as part of the Northern Territory Government Program 'Re-Thinking Waste' – <i>Waste Management Standards for Local Government in the Northern Territory</i>. The guidelines focused on improving the delivery of waste management services to communities with less than 1000 people.</p> <p>The guidelines were prepared by LGANT with support from the Re-Thinking Waste Program jointly funded by the former NRETAS and the Packaging Stewardship Forum in 2009.</p> <p>Waste management in small and remote communities has very specific challenges for community managers, and it is important that waste management services are not at a lower standard than would be expected in more populated areas. The guidelines were intended to provide support to community managers and technical service operators in working towards best practice and ensuring that waste management in small and remote communities is safe for staff, the community and the environment. Given this, these guidelines focus on:</p> <ul style="list-style-type: none"> • reducing the hazards associated with waste in small communities; • working towards improved environmental management of waste; • allowing communities to assess their current situation and provide some initial steps in how to improve waste management in their community; and • providing guidance on the service delivery standards that should be aspired towards under the new council structure. <p>It is proposed that these guidelines be re-evaluated as part of this broader reassessment of environmental guidelines.</p> |