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### **Tiwi Land Council (TLC) submission to the Northern Territory Environmental Protection Agency (NTEPA) in relation to the proposed Wurrumiyanga Subdivision**

The TLC is grateful for the opportunity to provide feedback in relation to the above project. Whilst supportive of the project, given the urgent need for additional housing to ease overcrowding within Tiwi communities, we believe that there are several elements of the project that require further consideration to ensure adequate planning and environmental protections are in place.

These issues are addressed in our submission below.

#### **Waste Water Treatment System**

The existing waste water infrastructure is insufficient to meet the needs of the current community, and it appears that upgrades to sewage ponds and associated infrastructure have not been provided for in this project.

Page 16 of the Referral Report states that the subdivision will be connected into the existing sewerage system infrastructure and that the existing system has sufficient capacity for future development. However, the existing waste water treatment ponds have been observed to have insufficient capacity with overtopping events occurring on an annual basis during the Wet season for many years.

Such events not only pollute the surrounding environment but also create a health hazard for the local community members. Recent minor infrastructure modifications may reduce the likelihood of overtopping events with the current input volumes, but the addition of a new 70 lot subdivision will significantly increase the volume of waste water into a system that appears to be inadequate.



Annual overtopping of Wurrumiyanga waste water ponds observed in February 2024

## Waste Management

Page 22 of the Referral Report states that construction and putrescible waste will be disposed of at the existing 'licensed waste management facility in Wurrumiyanga.'

However, the landfill that services Wurrumiyanga is not licensed and the nearest licensed facility is Shoal Bay in Darwin. The existing landfill at Wurrumiyanga is at capacity and unable to accept any large volumes of waste. The Tiwi Land Council will continue to support Tiwi Islands Regional Council with improvements to waste management, however any additional waste inputs would exacerbate the waste issues that already exist.

Illegal dumping of contractor waste due to the landfill being at capacity is an ongoing problem. The Tiwi Land Council strongly recommends all waste generated by the subdivision construction be shipped to Darwin for recycling and disposal.



The active landfill area at Wurrumiyanga within the TIRC lease is at capacity



## Water Source

Page 14 of the Referral Report states that PWC have confirmed that the existing bore field and supply mains have sufficient capacity to service the proposed 70 new lots to be constructed and operated. Further information is requested about the capacity of the existing water supply services as feedback from the community suggests shortages of water supply to existing homes and very poor water pressure.

## Gravel and Sand Resources

The three gravel pits investigated and assessed in Appendix B were not identified by TLC, and investigations by Douglas Partners have found they may be insufficient for the project. The proposal to import materials from the mainland to provide gravel and fill materials is not supported by the Tiwi Land Council due to the risk of importing invasive species including Gamba grass and Cane toads.

There are additional approvals required to secure fill, gravel and sand resources. One pit (Extract 2) is infested with Class B weeds within the existing disturbed area. Through well planned quarantine processes, there may be an opportunity to access gravel from the areas surrounding Extract 2 without spreading weeds into the proposed subdivision. Page 3 of the Referral Report states that these resources are managed by Tiwi Islands Regional Council. There are no current extractive agreements in place for any of the proposed locations to provide material for this project.

Further investigation of gravel and sand resources is required to identify locally available materials for the proposed subdivision.

## Areas of cultural or heritage importance

The Aboriginal Areas Protection Authority (AAPA) has identified two sacred sites in proximity to the northwestern boundary of the subject land and has placed a Restricted Works Area around them. Due to the confidentiality clause, the information on the Authority Certificate cannot be released. However, the TLC can advise that there are known burial sites in the vicinity of the subject land, where there is uncertainty about the exact location of the graves.

Certain activity may be permitted, such as vegetation management, and the use, upgrade and ongoing maintenance of existing infrastructure. To ensure protection of, and around, sacred sites and to avoid the desecration of any burials, extreme caution should be exercised when undertaking works. The TLC should be contacted when conducting all invasive works, such as, but not limited to, ground disturbance, so that burials and ceremonial activity are not interrupted.

Should the NTEPA require any further information in relation to this submission, we would be happy to assist.

Yours sincerely,  
**TIWI LAND COUNCIL**



Brendan Ferguson  
Chief Executive Officer