

TO: Northern Territory Environment Protection Authority (NT EPA)

VIA: NT EPA Open Consultations Portal (ntepa.nt.gov.au)

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POSTAL: [REDACTED], Darwin NT 0801

PROPOSAL: Project Ares – Hyperscale Data Centre Campus (Proponent: Energy North Pty Ltd)

SUBMITTER: PPlan: the Planning Action Network Inc.

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Executive Summary

PPlan: the Planning Action Network Inc. submits this formal public comment regarding the environmental impact assessment of **Project Ares** at Murrarji Station (NT Portion 851). While renewable infrastructure is welcomed, a project of this unprecedented magnitude—encompassing a 19,150 ha preliminary disturbance footprint, 1,038 MW of gas-fired generation, 4 GL/year groundwater extraction, and massive e-waste/battery lifecycles—demands the highest standard of precautionary regulation under the *Environment Protection Act 2019*.

1. Terrestrial Ecosystems & Biodiversity

- **Disturbance Footprint Limits:** The 19,150 ha disturbance envelope within an 186,000 ha project area represents a massive loss of native vegetation. The EIS must require strict baseline fauna and flora mapping to enforce strict avoidance zones prior to final spatial design.
- **Threatened Species Safeguards:** Direct impacts on threatened species—including the Greater Bilby, Northern Blue-tongued Skink, and Yellow-spotted Monitor—must be managed through enforceable, legally binding habitat exclusion buffers rather than post-clearing relocation.
- **Biosecurity & Invasive Species:** Servicing a construction workforce of up to 4,500 personnel introduces severe weed and pest introduction risks. The EIS must mandate washdown facilities, vehicle inspections, and ongoing biosecurity auditing.

2. Hydrological Processes & Groundwater Security

- **Montejinni Aquifer Drawdown:** Extracting up to 4 GL/year from the Montejinni Limestone Aquifer (Wiso Basin) presents long-term regional drawdown risks. The EIS must mandate independent, peer-reviewed 3D hydrogeological modeling

assessing multi-decade impacts on pastoral water security and regional groundwater flows.

- **Subterranean Fauna Sampling:** Comprehensive stygofauna and subterranean ecosystem sampling across the target borefield must be completed before any groundwater extraction permits are approved.

3. Air Quality & Greenhouse Gas Emissions

- **Fossil Fuel Generation:** Operating 1,038 MW of gas-fired power generation directly impacts Northern Territory emissions profiles. The EIS must fully quantify Scope 1 and Scope 2 emissions across the 30+ year lifespan.
- **Binding Decarbonization Timeline:** The NT EPA must condition any approval on a legally binding, phased schedule to replace natural gas with green hydrogen or additional battery storage as technology matures.

4. Lifecycle, Repowering & Waste Management

- **E-Waste Management:** Server hardware operating on 3–5 year replacement cycles will generate thousands of tonnes of hazardous e-waste over the 25+ year data centre lifecycle. The EIS must detail an onshore recovery and recycling framework.
- **Solar & BESS Decommissioning:** Decommissioning or repowering the 3,000 MWp solar array and 16 GWh BESS system presents significant long-term waste risks. The NT EPA must require upfront financial assurance bonds to guarantee full site rehabilitation.

5. Cultural Heritage & Social Impacts

- **Native Title & FPIC:** Engagement with Traditional Owners and Native Title holders must adhere strictly to Free, Prior, and Informed Consent (FPIC) standards to protect sacred sites and cultural values across Murrniji Station.
- **Regional Infrastructure:** The EIS must evaluate the social and service demands created by a 4,500-person construction village on neighboring communities such as Elliott and Daly Waters.

Key Recommendations for the Environmental Impact Statement

1. Enforce mandatory, like-for-like biodiversity offsets for high-value native vegetation clearing.
2. Mandate publicly accessible, real-time telemetry for groundwater monitoring wells and site atmospheric emissions.

3. Condition development approvals on dynamic financial rehabilitation bonds for all solar, battery, and gas generation assets.

Publication Consent: PPlan: the Planning Action Network Inc. authorizes the publication of this submission in full on the NT EPA web portal.

Authorised Signature:

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Convener, PPlan: the Planning Action Network Inc.

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