



Northern Territory Environment Protection Authority  
GPO Box 3675  
Darwin NT 0801  
[ntepa@nt.gov.au](mailto:ntepa@nt.gov.au)  
Via online submission

PO Box 36019,  
Winnellie NT, 0821  
ABN: 47 665 738 318  
P: 08 8945 6455  
M 0415 471 600  
[ceo@afant.com.au](mailto:ceo@afant.com.au)  
[www.afant.com.au](http://www.afant.com.au)

To Whom it May Concern,

**Re: Middle Arm Sustainable Development Precinct Strategic Assessment – Draft Terms of Reference**

Thank you for the opportunity to comment on the Draft Terms of Reference (ToR) for the Middle Arm Sustainable Development Precinct strategic assessment. Owing to the highly utilised and valued location of the site and this proposal being the first strategic assessment under the new environmental legislation, the terms of reference for the assessment of this referral are exceptionally important to the members of the fishing community in Darwin.

The Amateur Fishermen's Association of the Northern Territory (AFANT) is the peak body for recreational fishing in the Northern Territory. It is our role to represent the interests of 30,000+ amateur fishers in the NT, including our individual members, fishing clubs, association members, and related businesses. As an organisation, we support actions to foster sustainable development, and believe that the only suitable development in the NT is that which is nested within a health and abundant natural environment.

**Interest in the development area**

The most recent estimates available suggest that over one-in-five residents in the Northern Territory participate in recreational fishing each year. Government survey data reveals that 79% of NT recreational fishers live in Darwin, with 27% of all fishing occurring within the confines of Darwin Harbour. Recreational fishing is known to occur in all areas of the marine component of the indicative strategic assessment area. The marine environment that supports socially, culturally, and economically valuable fishing in the marine component area, as well as greater Darwin harbour is likely to be impacted by the proposed developments within the land component of the indicative strategic assessment area.

The proponent has identified that the environmental, social, cultural and economic values in the area have the potential to be significantly impacted and/or benefited by construction and operational activities within the proposed precinct. We concur with this and confirm that there appears to be highly likely potential for negative social, cultural, and economic impacts on the recreational fishing sector. These concerns stem from the highly likely potential for negative impacts during construction and operation to the natural values and ecosystems that support the values presently accessed by recreational fishers.

## **Acknowledgement of issues and interests within the Draft ToR**

### Coastal Processes

Under the section Coastal Processes - Environmental Values (Table 8), the proponent has confirmed the intention to identify known recreational fishing sites. This is supported, however, given that the resolution of data usually collected by Government agencies on fishing locations is not at fine resolution, we suggest a desktop analysis or reference to existing databases will not suffice to inform this identified need. The proponent has engaged with our association with a view to better understanding fishing in the area(s). We believe it would be suitable for the ToR to require consultation with both ourselves (AFANT) as the peak industry body, as well as DITT Fisheries Division to inform this section.

### Community and Economy

Under the section Community and Economy - Potential Impacts and Opportunities (Table 14), the proponent has identified the need to understand *impacts on other economic sectors including tourism, fishing and aquaculture*. Again, this is supported, and we highlight that the proponent should be required to engage with AFANT in the process of assessing these potential impacts. In addition to seeking to minimise impacts, we encourage the proponent to consider how unavoidable impacts to recreational fishing may be offset through investment in fish habitat such as oyster reefs and artificial reefs. The ToR should include the requirement to consider suitable offsets for recreational fishing.

### Community and Economy – Cumulative Impacts

Under the section Community and Economy - Potential Impacts and Opportunities (Table 14) the proponent has identified the need to assess cumulative impacts, *e.g., industrialisation, discharge of waste water, dredging, reclamation, increased marine traffic, loss of mangroves and iconic species such as turtles, dugong and dolphins, migratory birds, loss of fishing breeding areas, reduced water quality, contribution to greenhouse gases and climate change*. As an organisation concerned with the health of Darwin harbour, we, along with our constituents have concerns about the failure of successive projects and development to properly assess and account for the cumulative impacts of development and we welcome this approach.

We note however, that the cumulative impacts on access for recreational fishing, the cumulative loss of fishing locations (as opposed to “fishing breeding areas”) and therefore the cumulative impacts on fishing experiences (and the economic benefits that flow from these) are not directly listed. It is our position that the ToR should explicitly require the addressment of cumulative impacts on recreational fishing access and experiences and that it should be concerned with identifying offsets commensurate with the impacts identified.

### Strategic Assessment Concerns

While the potential benefits of a strategic approach to precinct planning for industry, environment and community are acknowledged by our organisation, we remain concerned about the potential for significantly less transparency and opportunity for community input on the assessment of subsequent project approvals within the precinct. We highlight the highly connected, contested, and valued nature of the precinct site(s) and we suggest any strategic approval must include mechanisms for the proponent to be required to host a mandatory process to facilitate public notice, comment and review of individual projects within the precinct.

## Communication and Public Submissions

We welcome the commitment from the proponent to produce plain English standalone summary of the EIS. Given the public interest in the precinct this is a necessary communication to provide accessible information to all interested parties.

With regard to public exhibition requirements, the proponent has referred to the legislated period of between 30 -60 business days. Given the scale, location and complexity of this assessment, as well as the fact this is the first strategic assessment under the new environmental protection regime, it is our position that the EPA should determine 60 days for public comment is necessary to allow interested parties to appropriately respond to the EIS.

I thank you for the opportunity to have input on this referral. Should you require any further information, please do not hesitate to contact me directly.

Yours sincerely,



David Ciaravolo  
Chief Executive Officer  
10/06/2022