

Submission on draft terms of reference

Provaris Energy Ltd- Tiwi H2 Project

This submission is made under regulation 103 of the Environment Protection Regulations 2020

NT EPA reference number: EP 2022/017

Government authority: Northern Territory Police, Fire and Emergency Services (NTPFES)

Summary: The Tiwi H2 Project proposal is likely to have significant impacts for the provision of emergency services and responses to NTPFES events.

Section of terms of reference	Theme / issue	Comment
2.4 Information requirements for environmental factors	<p>Northern Territory Fire and Rescue Service (NTFRS) feedback.</p> <p>Avoidance, mitigation and management (Tables 2 to 9)</p>	<ul style="list-style-type: none"> • The NTFRS is established pursuant to the <i>Fire and Emergency Act 1996</i> (the Act) which makes provision for the operational and emergency response activities of the NTFRS for the protection of life, property and the environment against fires and other emergencies. • The NT has a population of approximately 245 000 people and a land mass of approximately 1.3 million square kilometres. The majority of the NT's population reside in areas, which covers approximately 2 per cent of the NT's land mass. The NTFRS is responsible for the majority of the NT's population who reside in the larger populated cities and towns as well as the main transport corridors in respect to fire. The NTFRS is also responsible throughout the NT in respect to road crash and hazardous materials response. • The proposed TOR does not adequately request information that will describe the potential impacts on NTFRS to respond to increased fire and emergency incidents arising from the proposed manufacturing industry on Melville Island, or in the event of road or marine incidents transporting hazardous and combustible materials. • The NTFRS has extremely limited capacity and capability to respond to any HAZMAT or CBRN incidents occurring at the project location or access routes. Additionally, NTFRS does not possess marine firefighting or shipboard response capability, in the event a HAZMAT incident occurs in NT waters. • It should be noted that the location is not within an NTFRS Emergency Response Area and the capacity to respond to fires or other emergencies on Melville Island is limited. The closest NTFRS response capabilities is a Volunteer Fire and Emergency Response Group located in Wurrumiyanga on Bathurst Island.

Environmental impact assessment under the Environment Protection Act 2019

		<ul style="list-style-type: none"> • Fire, HAZMAT and other emergency incidents have been noted in 'Relevant Activities' or 'Potential Impacts and Risks' within all identified 'Environmental Factors' at Tables 2 to 9. However, no 'Specific Information Required' is listed in 'Avoidance, Mitigation and Management' sections. • Development of the proposed Tiwi H2 Project on Melville Island should also have regard for options for dedicated fit for purpose resources and emergency response infrastructure to mitigate the risk of large-scale fire, HAZMAT, road incidents and/or marine incidents. For example dedicated firefighting capability and resources at the project site.
	<p>Northern Territory Emergency Services feedback</p>	<ul style="list-style-type: none"> • The ToR does not include assessment on the impact to surface/storm water runoff or flood profile, impacting on the proposed area for development would be classified as insignificant.
	<p>Northern Territory Police Force feedback</p>	<p>Further consideration and planning required:</p> <ul style="list-style-type: none"> • Traffic Management and Road Safety; increase traffic volume impact assessment. • Hazardous Material (if any) storage and transportation. • Explosive material (if any) use and storage. • CT assessment, risk and mitigations, • Public safety and protest management from IMG activities • Site Security Management Plan • Residential impacts on TIWI, public safety, EM and Infrastructure • Workforce management FIFO impacts on traffic, accommodation and local amenity