

**From:** [Secretariat PFES](#)  
**To:** [NTEPA Consult](#)  
**Cc:** [Secretariat PFES](#)  
**Subject:** Invite to comment - NT EPA Draft Guidelines - Culture and Heritage Factor and Atmospheric Process Factor  
**Date:** Thursday, 7 July 2022 12:08:02 PM  
**Attachments:**

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Good morning,

Thank you for your request for the Northern Territory Police, Fire and Emergency Services to comment on the NT EPA Draft Guidelines - Culture and Heritage Factor and Atmospheric Process Factor.

The information provided below relates to the Northern Territory Fire and Rescue Service (NTFRS):

<b>Draft Guidance for Environmental Factors: Atmospheric Processes</b>	<p>Anecdotal evidence indicates that particulate pollution in the Top End, mostly stemming from landscape fires has been increasing and shifting in seasonality. To a lesser degree, increases in structural / property fires due to infrastructure and population growth within NTFRS Emergency Response Areas may contribute to pollution increases although considered a lesser contributor. Landscape burning, particularly on Aboriginal land (in the early dry season) has been a primary driver of increased early dry season pollution in the Top End, and is largely due to the large amounts of area burnt and the strong changes in the seasonality of landscape burning activity on these lands. While early dry season burn-offs may offer carbon abatement benefits, it has a disproportionate effect in the Top End compared to late dry season burning. The Department of Environment, Parks and Water Security possesses monitor data regarding fire-related emissions resulting from savannah, grasslands and woodlands.</p> <p>In relation to emissions data for the NTFRS' operational responses to structural / property related fires, there is no available monitoring data collected or capability within the NTFRS that would allow the NTFRS to satisfy the requirements of section(s) 7.1 – Estimated emissions; 7.2 – Emissions management; or 7.3 – Greenhouse gas abatement plan. To enable the NTFRS to comply with the proposed Guidance for Environmental Factors: Atmospheric Processes as drafted, it would require the NTFRS to procure the services of an independent and suitably qualified body ( e.g. Charles Darwin University or Menzies) to collect, monitor and analyse data related to emissions resulting from NTFRS operational responses to fire incidents to enable it to comply with the requirements of the guidance for the purposes of the NT Environmental Protection Authority's assessment and decision making as part of a referral.</p>
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Many thanks,  
Sophie

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*We acknowledge the first nation people through traditional owners, custodians of country throughout Australia and their continuing connection to land, sea and community. We pay our respects to their culture and to their Elders both past and present.*