

Submission on the Proponent Initiated Environmental Impact Statement Referral (PIEIS)

Department of Logistics and Infrastructure (DLI) - Adelaide River Off-stream Water Storage (AROWS)

This submission is made under regulation 53 of the Environment Protection Regulations 2020

Government authority: Department of the Chief Minister and Cabinet

Section of Referral or ToR	Theme or issue	Comment
ToR, SoR p.9	Community and Economy Information and analysis gaps	<p>CM&C acknowledges the scale of the AROWS project and the work undertaken by DLI to ensure the project meets the NT EPA's environmental objective to 'Enhance communities and the economy for the welfare, amenity and benefit of current and future generations of Territorians.' This major project is in the early stages of development and its potential impacts and benefits (direct, indirect, cumulative) will continue to emerge as the project progresses. Key project attributes are still being determined, such as the required workforce (estimated at 40–1000 direct and indirect jobs Ref. p39), the required investment, and the potential impacts for downstream areas and stakeholders. This uncertainty is acknowledged in the Statement of Reasons (SoR) but not in the Terms of Reference (ToR). Community consultation is also acknowledged to be at an early stage (Referral p.62). Ongoing engagement will be important to identify community value and sensitivities and assess potentially significant impacts.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> • The ToR acknowledge that the environmental impact statement (EIS) will need to consider additional (community and economy) impacts and benefits as the project progresses. Alternatively, when potentially significant impacts are better identified and understood, the SoR could be updated and the ToR re-issued. • ToR Table 3.9 be revised so that direct and indirect economic and social impacts and benefits are articulated and include all potentially affected values and stakeholders. 'Relevant activities' should also include changes to the downstream environment that may have economic or social impacts/benefits. 'Residual impacts' should include impacts to all stakeholders.
SOR p.9, Referral p.48-62, ToR 2.24, 2.26, 3.8, 4.3 and 4.5	Stakeholder Engagement Information and analysis gaps.	<p>The Referral provides a clear strategy and approach to address stakeholder engagement consistent with the IAP2 principles, best practice guidelines and legislative requirements. Stakeholder engagement for the proposal is complex due to the duration of the project, the diverse range of stakeholders affected, and the impacts and benefits of the proposal in relation to the community and economy factors only being clearly established over time. Components of the ToR could be strengthened to ensure the EIS demonstrates that community and stakeholders have (a) received current information in relation to specific potential impacts and benefits and (b) had the opportunity to have their views considered in decisions associated with the project.</p> <p>Recommendation:</p>

		<ul style="list-style-type: none"> Stakeholder information on the potential for significant impacts and benefits of the proposal include assessment across the life of the project (not just individual stages or components). Where an impact/benefit is uncertain, this must be clearly stated. New information on the potential impacts/benefits of the proposal be communicated in future stakeholder engagement. Future stakeholder information should also clearly communicate potential cumulative and 'whole of environment' (ToR 4.3) impacts/benefits across all impacted stakeholder groups. The ToR require the EIS to clearly distinguish between engagement activities undertaken at each phase of the project. The ToR be reviewed so that all stakeholders directly or indirectly impacted by the proposal are included in engagement and decision-making processes. This is particularly relevant for the community and economy factor but is also relevant for other factors. The ToR Section 2.2.6 could be updated to include stakeholder engagement as an activity at the project's design phase.
<p>Ref Section 5.8 - Community and Economy ToR Section 3.8 - Community and Economy Section 4.3 - Whole of environment considerations</p>	<p>Economic impacts Information and analysis gaps</p>	<p>The significant economic impacts of the proposal will require the EIS to demonstrate that the project will maximise benefits and minimise costs for the Territory. We note that the 2021 AROWS Detailed Business Case (DBC) was developed for a different purpose, and water demand estimations, technologies and costings in the DMC are no longer current.</p> <p>Recommendation:</p> <ul style="list-style-type: none"> The ToR include the requirement for the proponent to undertake an Economic Impact Assessment as signalled in the Referral (p181). This assessment should align with NT EPA guidance for preparing an Economic and Social Impact Assessment, address Infrastructure Australia's recommendations on the DBC and use current information and standards. Matters to incorporate in the ToR could be whole of lifecycle (including wastewater and rehabilitation) costs, the impacts of competition for labour and materials, externalities, key opportunity costs and potential policy changes that may have economic costs or benefits. The ToR could also include a requirement to develop an Economic Impact Management Plan alongside the proposed Social Impact Management Plan.