

Submission on the referral

Department of Infrastructure, Planning and Logistics – Middle Arm Sustainable Development Precinct

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

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

Summary: The Middle Arm Sustainable Development Precinct proposal is likely to have significant impacts for the provision of emergency services and responses to fire, rescue and emergency events. The NTPFES has extremely limited capacity or capability to respond to potential HAZMAT, Chemical, Biological, Radiological and Nuclear (CBRN) incidents arising due to the increased development of the Precinct and low emission petrochemical, renewable hydrogen, carbon capture storage and minerals processing industries within the Precinct and along the Northern Territory’s (NT) road corridors and waters.

Section of Referral/Draft Terms of Reference	Theme or issue	Comment
Middle Arm Sustainable Development Precinct Referral Report – section 6.	Preliminary potential impacts and/or benefits. EPA factor – Communities and economy	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.
Middle Arm Sustainable Development Precinct Draft Program – section 5.4		The Northern Territory 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 throughout the NT in respect to road crash and hazardous materials response.
Middle Arm Sustainable Development- Terms of Reference for		The proposal does not adequately describe the potential impacts on NTFRS to respond to increased fire and emergency incidents arising from the proposed manufacturing industries within the Precinct, or in the event of road or marine incidents transporting hazardous and combustible materials along the NT’s road corridors and waters. The NTFRS has extremely limited capacity and capability to respond to any HAZMAT or CBRN incidents occurring along road corridors and within the Precinct. Additionally, NTFRS does not possess marine firefighting or shipboard response capability, in the event a HAZMAT or CBRN incident occurs in NT waters. NTFRS responses to incidents within the Precinct would require diverting resources from Palmerston (the closest to the Precinct), Darwin or Berrimah Emergency Response Areas (ERAs) to respond and place the community at risk in the event multiple emergency incidents occur. It should be noted that the location of the Precinct is outside the optimal response time of 8 minutes from the Palmerston ERA.
		Development of the Future Industries proposed in the Precinct Draft Program and Terms of Reference for a Strategic Assessment should also have regard for options for dedicated fit for purpose resources and emergency response infrastructure

Environmental impact assessment under *the Environment Protection Act 2019*

a Strategic Assessment - section 3.5.11		<p>to mitigate the risk of large-scale fire, HAZMAT and/or road incidents, for example dedicated firefighting capability and resources at the Precinct.</p> <p>Note- Within the context of the NTFRS' current resource and budgetary constraints, consideration should be given to a user pays system (where companies operating within the Precinct provide their own Emergency Response Teams); or the introduction of a levy if the required services were not government funded.</p>
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