

Referral for Strategic Environmental Assessment - Middle Arm Industrial Development Precinct

Thank you for the opportunity to comment on the above document.

General comments

This proposal is of immense concern to me. I have no confidence that the proposal submitted by Department of Infrastructure Planning and Logistics is supported by Territorians, noting that it is a product of the TERC process, which did not involve the normal planning procedures designed to garner informed public consent.

Furthermore it seems remarkable that a competent government in this century would seek to establish heavy industry precinct alongside a developing major urban centre or a highly valued fragile tidal ecosystem.

I'm also deeply concerned that the quality of information presented is insufficient for stakeholders like me to fully understand the impacts and risks of the proposal. The lack of quality information is however sufficient for me to see that DIPL is not taking these risks seriously.

I'm concerned about using the Strategic Assessment Approach to assess the precinct rather than clearly detailing and assessing the constituent parts. I believe this does NOT allow stakeholders to appreciate what the specific developments will be. This is necessary to gauge the acceptability of impacts understand how negative impacts will be avoided and managed into the future and positive impacts enhanced and promoted. I contend a detailed development plan is needed.

I am concerned that failure to provide details of specific developments creates a risk of lock-in whereby the public unwittingly accepts the comparatively innocuous "sustainable development precinct" when we may in fact be fundamentally opposed to the activities and their consequences it leads to (e.g. petrochemical plant, dredging, mangrove damage, pollution and health incidents in Palmerston).

I believe naming the proposal a "sustainable development precinct" is misleading given its:

- focus on petrochemical and mineral processing that results from mining activity, which is by definition, is unsustainable.
- The International Panel on Climate Change Working Group III has highlighted that All global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, and those that limit warming to 2°C (>67%), involve rapid and deep and in most cases immediate GHG emission reductions in all sectors.

https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf

- Investing in a precinct the viability of which turns upon a protracted gas sector is an anathema to sustainability
- The life cycle of the project is only 50 years, which means it does not meet intergenerational equity considerations.

For the above reasons I strongly believe this referral should either be returned or deemed unacceptable.

Specific matters in relation to the NT EPA Environmental factors

A persistent failure throughout is that it partly documents the values and some of the risks associated with each factor and characterises them as “potentially significant” and describe some further studies that might be undertaken without offering realistic comfort that the risks can be resolved.

I firmly believe this alarming lack of detail is unacceptable. The applicant must do sufficient work in this document to give some the public some assurance that the risks can be mitigated. This information is needed in order for the public to give informed consent and must be made available before this referral can proceed.

However as a heavy industry precinct located adjacent to a large commercial and residential precinct, and fragile harbour is clearly not contemporary best practice, I believe it is impossible to properly address these risks. Therefore I believe it would be more appropriate that the proposal not proceed at all, or to be very substantially reduced in scale.

NT EPA Environmental Factor	Comment
Landforms	(My above comments about “alarming lack of detail” and need definitive studies apply to all factors)
Terrestrial environmental quality	
Terrestrial ecosystems	
Hydrological processes	
Inland environmental quality	
Aquatic ecosystems	The project would appear to have very serious impacts which are glossed over by reference to future studies this is unacceptable. The onus should be upon the proponent to provide enough information for the public to engage with.
Coastal Processes	
Marine environmental quality	
Marine ecosystems	I’m concerned that no substantive studies are provided despite being on the doorstep of a substantial environmental asset. I’m also concerned that the proposal threatens mangrove areas which I understand are being protected as an offset to the INPEX plant.

NT EPA Environmental Factor	Comment
Air quality	Petrochemical plants and heavy industry precincts clearly involve severe risks by nature of the chemical used and should have far greater buffers from built up areas. The location is highly inappropriate.
Atmospheric processes	As mentioned in my general comments this precinct locks in long-term GHG extractions and emissions which is against IPCC advice. I am opposed to offsetting these unnecessary emissions. The applicant's statement (page xii) that NT GHG emissions are comparatively low compared to other Australian jurisdictions has nothing to do with its application and demonstrates it does not understand the seriousness of the issue. I'm also concerned that the establishment of this industry has cascading lock-in effects on other problematic industries such as unconventional gas extraction from the Beetaloo Basin.
Community and economy	I'm concerned that the benefits and costs are not evenly shared. Most Darwin people are negatively impacted by having heavy industry on their doorstep, a legacy of carbon emissions and loss of environmental amenity, and aesthetics of the harbour with profits only going to a few.
Culture and heritage	
Human health	Petrochemical plants are clearly involve severe risks by nature of the chemical used and should have far greater buffers from built up areas. The location is highly inappropriate.

Thank you for the opportunity to comment.