NT Rebound                                                   24th July 2020
GPO Box 3200
Darwin NT 0801

Mode of delivery
Email to: ntrebound@nt.gov.au

Dear Territory Economic Reconstruction Commission,

## Re: Submission in response to NT Rebound

The Environment Centre NT (ECNT) is the peak community sector environment organisation in the Northern Territory, Australia raising awareness amongst community, government, business and industry about environmental issues and assisting people to reduce their environmental impact and supporting community members to participate in decision making processes and action. ECNT welcomes the opportunity to provide comments to the Territory Economic Reconstruction Commission (TERC).

## Executive Summary

In the last months there been a plethora of scientific and industry economic recovery plans from around the world urging governments and businesses to use this once in a lifetime investment opportunity to create a cleaner, smarter, more resilient and equitable world.[1] In the Northern Territory, we have the opportunity to position ourselves as a world leader in a low-emissions economy based on renewable energy. Rising temperatures, wet season failures, droughts, floods and other effects from climate breakdown will affect our natural environment and most vulnerable people living in regional and bush communities. We urge the TERC to prioritise actions that deliver long term social and environmental benefits that will build resilience and response to climate change, particularly targeting the most disadvantaged people and communities. In considering investment for the Territory, consideration must be given not only to projects that drive investment now but also initiatives that reduce the risk of future economic shocks to the NT, particularly in the areas of climate disruption, legacy mines, drinking water insecurity and damage to our coastal and land biodiversity.

We offer the following beneficial project ideas to build jobs, investment and resilience. Many of the major infrastructure investments we make now will be paid for by future generations, so they must contribute to building a biologically and climate resilient world. We provide project ideas in the following areas:

1. **Addressing Climate Change – Implement a Climate Change Act, sending a clear signal to industry and investors that the Northern Territory Government is serious about a clean energy growth strategy.**

2. **Renewable Energy – implementing the 10 Gigawatt Vision and Road Map to, creating over 8,000 new jobs and over $2 billion in revenue.**

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[1] United Nations, António Guterres, *A Time to Save the Sick and Rescue the Planet,* see
https://www.un.org/sg/en/content/sg/articles/2020-04-28/time-save-the-sick-and-rescue-the-planet
European Parliament, *Covid-19: EU recovery plan should prioritise climate investment*
https://www.europarl.europa.eu/news/en/headlines/society/20200429STO78172/covid-19-eu-recovery-plan-should-prioritise-climate-investment and https://ec.europa.eu/info/sites/info/files/factsheet_1_en.pdf

3. **Conservation and Land Management – Support a Gamba Army, Indigenous Ranger Groups and practical conservation activities, including mine rehabilitation, across the Northern Territory. Implement a Biodiversity and Land Management Act.**

4. **Implement the Coastal Marine Management Strategy and a Strategic Environmental Assessment of Middle Arm area to protect and enhance the economic values of the Northern Territory coasts and the Darwin Harbour.**

5. **Prioritise projects that provide water security across the Territory**

6. **Deliver energy efficiency reform and energy efficiency projects, prioritising the most disadvantaged.**

7. **Support projects that reduce waste including organic waste recycling and better local processing of recyclable materials**

8. **Invest in cycling and walking transport infrastructure**

9. **Support local council job creation initiatives**

10. **Invest in local food security projects**

### Respond to Climate Change

The (NTG) has recently released their Northern Territory Climate Change Response: Towards 2050[2] framework, including a three year action plan[3]. Whilst we support this framework and the plan we recommend that a Climate Change Act be implemented in the Northern Territory to send a clear signal and offer certainty to industry and investors that the Northern Territory Government is serious about prioritising a clean energy growth strategy.

Introducing a Climate Change Act, which would[4]

- Legislate a target of net zero emissions by 2050, in line with globally agreed goals of the Paris Agreement;
- Commit the NT to net zero emissions by 2050 with requirement to adopt 5-yearly interim targets by the end of 2020;
- Ensure adaptation measures are taken, focusing on the most vulnerable communities;
- Drive low-carbon investment and innovation, and lower the cost of a just transition to a low-carbon economy; and
- Provide certainty and confidence for business and civil society, with positive influence on investor confidence.

We urge the TERC to apply a climate justice framework to the NT's economic recovery. This recognises that the impacts of climate change will be felt disproportionately by already vulnerable populations. Across the Northern Territory, these impacts are already being experienced in the areas of water security, energy security, housing, and human health, particularly by those living in remote Indigenous communities. A

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[2]Northern Territory Government; https://denr.nt.gov.au/__data/assets/pdf_file/0005/904775/northern-territory-climate-change-response-towards-2050.pdf

[3] Northern Territory Government https://denr.nt.gov.au/__data/assets/pdf_file/0004/904774/northern-territory-climate-change-response-3year.pdf

[4] Environmental Defenders Office; https://d3n8a8pro7vhmx.cloudfront.net/ecnt/pages/325/attachments/original/1593563562/A-Climate-Change-Act-for-the-NT.pdf?1593563562

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climate justice lens prioritises solutions led and supported by these communities, that simultaneously work to reduce existing vulnerabilities and inequalities.

We call for no new fossil fuel developments, including a permanent ban on oil and gas fracking recognising that the industry's emissions profile is incompatible with a safe climate future and poses unacceptable risks to our water security and human health. We refer you to recent Australia Institute reports[5] that highlight the impacts and risk of subsidising the gas industry for stimulus and recovery spending and why this is not the best option for the NT.

### A solar-powered economic recovery plan will grow jobs for Territorians

Imagine a Territory dotted with solar panels, electrolysers, batteries and smart grids, transforming our abundance of sun into stored and distributed energy, and ensuring a stable supply. As the Commission devises a strategy to rebuild our economies, we urge members to ensure that the potential of renewable energy to create skilled, high-wage jobs for Territorians, deliver cheaper, cleaner energy to our communities and attract high-value industry to the Territory is realised.

Renewable energy has already played an important role in stimulating our economy by employing a large number of tradespeople quickly and local demand and investment interest in solar remains strong.

A number of renewable energy projects stand ready to create immediate jobs in a safe, sustainable industry that enjoys strong social license. For example, a $100m privately funded, solar energy farm at Livingston south of Darwin is shovel ready for the first quarter of 2021. This follows smaller projects already underway at Batchelor and Manton Dam.

The government-commissioned **Roadmap to Renewables report** proposed a series of key actions that would provide economic stimulus in the near term and were approved by the government. These actions can be rolled out quickly and drive a recovery plan on a scale that will employ local Territorians and move the Territory toward the government's renewable energy target of 50% by 2030.

Renewable energy is both a low-cost, efficient, locally abundant energy source and **has vast economic potential** to spark a vibrant manufacturing sector with export opportunities in energy infrastructure, zero-carbon manufacturing and minerals processing.

Compared to the long lead times of gas projects and **their vulnerability to global price shocks** (that are already impacting NT petroleum exploration), solar farms and renewable energy infrastructure can be rolled out quickly. Screwdriver-ready works or proposals that would be simple to execute include:

- Accelerating the government's **Rooftop Solar for Schools program**
- Expanding the government's **Home and Business Battery Scheme** and introducing a time-of-use tariff to drive further uptake of solar and battery
- Installation of solar and storage backup for all critical state infrastructure, such as police facilities, fire stations and telecommunications
- Installation of solar on public housing and low-income rental housing
- Granting Major Project status to projects such as the Livingston solar farm to remove institutional barriers and move toward construction

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[5] The Australia Institute; *Gas Fired Backfire;* https://www.tai.org.au/sites/default/files/P908%20Gas-fired%20backfire%20%5Bweb%5D.pdf and *Why onshore gas will not help manufacturing in the NT* https://www.tai.org.au/sites/default/files/P944%20NT%20gas%20and%20manufacturing%20%5BWeb%5D.pdf

The best policies always offer co-benefits and in supporting the NT solar industry not only do we create jobs but we also:

- Manufacture our own energy security - by capturing and circulating solar energy within NT borders we buffer Territorians from the chaos of global energy markets
- Build a low wholesale cost of electricity future that can underpin broad-scale economic development founded on low-cost electricity – jobs and economic recovery
- Reduce energy bill stress and speed up the economic recovery of thousands of NT households and businesses whose incomes have been impacted by Covid-19

Prioritising a renewable energy economic recovery is work that can be achieved by a growing local workforce. It will be more immune from future public health shocks that have ground FIFO operations to a halt.

We also include our 10-Point Plan which sets ten actions for the NT Government to repower the NT with renewable energy, creating thousands of new jobs and lowering power prices.

Execution of the 10-Point Plan possibly lies on a longer timeline than what is being considered by the Commission, however it is important that any recommendations made by the Commission is done so within the context of sustainable long-term plans for the Territory.

The 10-Point Plan was developed in conjunction with renewable energy experts in the Northern Territory, local solar installers and other environmental and community groups, including from work at a recent Climate Justice Forum in Alice Springs.

At the top of the plan is delivering the 50% renewable energy target by 2030. A renewable energy target is vital to driving the growth of renewable energy in the Territory. It provides governments a firm framework within which to build complex policy, turning promises and ambition into a concrete goal.

Delivering that target requires completing the 11 recommendations and 50 enabling actions of the Roadmap to Renewables, a 2017 report authored by an independent expert panel. If the NT Government is committed to delivering the renewable energy target, we need to see much faster completion of the steps in the roadmap.

Other key asks include solar for all new government buildings including social and affordable housing, a feasibility study of an HVDC transmission line between Darwin and Alice Springs, a community renewables program to support solar in regional and remote NT and the introduction of a time-of-use tariff.

The plan also calls for a major new strategy to establish the NT as the Renewable Energy Territory, endorsing renewables as a whole-of-government initiative and placing it as a central pillar of the NT's economic policy.

The Renewable Energy Territory would include a clean, innovative, safe and competitive renewable hydrogen industry, beginning with a renewable hydrogen pilot plant.

With smart policy support, a large proportion of renewable energy infrastructure can also be manufactured in NT. Manufacturers aiming to establish their sustainability credentials will be attracted to the NT's abundance of affordable, clean energy. For example, one of the biggest potential employers is battery manufacturing, with further opportunities from making transmission components. In return for underwriting renewable energy development, the NT government should require local production of equipment to drive NT manufacturing.

Lastly, we encourage the Commission to consider the ideas introduced by our report The 10 Gigawatt Vision, written in conjunction with Beyond Zero Emissions, along with their latest work "The Million Jobs Plan". The 10 Gigawatt Vision showed that by 2030, the NT Government could help drive investment in 10 gigawatts of renewables, creating over 8,000 new jobs and over $2 billion in revenue.

Across the Territory, our community has stepped up in the face of the unprecedented challenge presented by Covid-19. Remote communities have acted early to protect themselves, while our cities and townspeople have taken the advice to stay home to stay safe and supported one another through such difficult times.

The Northern Territory that emerges from this crisis will look considerably different from the one we started this year with. And as we emerge, we have an incredible opportunity to reshape our communities and industries for the better and make a long-term investment into a stronger, more sustainable and secure Territory.

Attached:

- Repower NT: 10-Point Plan
- 10 Gigawatt Vision
- The Million Jobs Plan

## REPOWER NT: 10-POINT PLAN

**Our Repower NT: 10-Point Plan sets out ten actions for the NT Government to repower the NT with renewable energy, creating thousands of new jobs and lowering power prices.**

**By executing the 10-Point Plan, the NT Government can capture an incredible opportunity to turn NT's abundance of solar resources into jobs, drive economic growth and secure affordable energy for all Territorian communities.**

### Deliver the 50% renewable energy target by 2030
A renewable energy target helps grow thousands of NT jobs and lower power prices in the Territory. It provides governments a firm framework within which to build complex policy, turning promises and ambition into a concrete goal, and provides local NT solar companies a stable set of conditions within which to operate their businesses.

By completing the 11 recommendations and 50 enabling actions of the Roadmap to Renewables, the NT Government can deliver the renewable energy target whilst maintaining the affordability of NT's energy supply and without compromising network reliability and security.

### Solar for all new NTG Buildings, including social and affordable housing
Here in the Territory, the Government purchases roughly one-quarter of the Territory's total energy consumption – that's huge! It means the government is in a unique position to influence the uptake of renewable energy in the Territory, much more so than the governments of other states and territories.

The NT Government can lead the way by using renewable energy for its own operations –  including social housing, schools and hospitals – provided by local NT solar companies. And it should mandate the installation of solar panels for all new government buildings.

### A feasibility study of an HVDC transmission line between Darwin and Alice Springs

Transmission lines are the arteries of the electricity system. And with the cost of High Voltage Direct Current (HVDC) transmission decreasing, more and more regions across the world are using this technology to efficiently move electricity over long distances.

The Northern Territory Government should undertake a feasibility study, including cost benefit analysis, of building an HVDC transmission line between Darwin and Alice Springs. This line could then facilitate the rollout of renewable energy, increase energy security and reduce power prices. It would help link up energy-intensive industries with large new renewable energy zones from right across the Territory.

### Community renewables program to support solar in regional and remote NT

Regional and remote NT, including Indigenous communities, stand to benefit the most from cheap renewable energy – yet too many remain shut out of the solar revolution. A community renewables program could help fund feasibility studies, create seed money, award grants, and employ regional renewable energy coordinators to support communities in their engagement in large and small-scale renewables projects.

### Establish NT as a Renewable Energy Territory and a renewable hydrogen pilot plant

The NT Government should announce a major new strategy to establish NT as the Renewable Energy Territory. Renewable energy electricity generation should be endorsed as a whole-of-government initiative and placed as a central pillar of the NT's economic policy.

As the world transitions to renewable energy, the Northern Territory's abundance of sunshine means we have an exceptional opportunity to prosper in this new era. Our report The 10 Gigawatt Vision, written in conjunction with Beyond Zero Emissions, showed that by 2030, the NT Government could help drive investment in 10 gigawatts of renewables, creating over 8,000 new jobs and over $2 billion in revenue. An ambitious renewables strategy can spark a vibrant manufacturing sector in the Territory, with export opportunities in energy infrastructure, zero-carbon electrified manufacturing and minerals processing.

The NT also needs to kickstart a clean, innovative, safe and competitive renewable hydrogen industry that creates jobs and benefits all Territorians, beginning with a renewable hydrogen pilot plant.

### Set a local content target for all large-scale renewable energy projects to drive NT manufacturing

With smart policy support, a large proportion of renewable energy infrastructure can be manufactured in NT. Manufacturers aiming to establish their sustainability credentials will be attracted to the NT's abundance of affordable, clean energy. Up to a third of renewable energy jobs could be in manufacturing.

In return for underwriting renewable energy development, the NT government should require local production of equipment. One of the biggest potential employers is battery manufacturing, with further opportunities from making transmission components. In the past, attempts were made to develop a large battery factory in Darwin, but were held back by a lack of guaranteed procurement.

Renewable technologies are mature enough to power even the most energy-hungry manufacturers and can replace fossil fuels in production of a wide range of materials including food, beer, glass, bricks and cast metal. And an advantage for a small economy like the NT is that many electrical heating technologies, such as heat pumps, can be installed as small, modular units. This can help foster an economy of reduced scale as smaller equipment requires less space, and facilities can be decentralised and sited close to raw material sources or product markets

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**Review training programs to grow skills of the local labour force**
The renewable energy industry is supported by a diverse workforce, including tradies and technicians, machine operators and drivers, and labourers. And with the right support, many Territorians workers will be able to successfully transfer from fossil-fuel industries into renewables.

A review of the structure and suitability of the NT's relevant training systems across the renewable energy industry would ensure the labor force aligns with industry needs and delivers certainty of career pathways. Traditional apprenticeships, short courses, group training schemes and inputs from higher education institutions should be considered as areas for review.

**Introduce a time-of-use tariff**
A time-of-day tariff is a mechanism to price electricity according to the time of day. During peak times, such as during weekday evenings when the network is most congested, electricity costs the most. By implementing a time-of-day tariff, that peak period could become an opportunity for solar and battery owners to sell energy back to the grid and get the most bang for their back from their investments.

The NT Government should introduce a time-of-day tariff to continue to encourage greater uptake of rooftop PV and battery storage systems in the NT. It would enable consumers to reduce their electricity costs during the most expensive times of the day, promote energy efficiency, and increase reliability and security by reducing demand pressure on the system at times of high demand.

**Establish an ancillary services market**
The Northern Territory Government should unbundle costs associated with ancillary services from current electricity generation by Territory Generation. The unbundled pricing models and the proposed structure and timing of implementation of an ancillary services market within the Northern Territory Electricity Market (NTEM) should then be communicated to industry

The Government should also report on financing options and possible methods of measuring and recovering financial returns on investment in ancillary services, such as batteries. Renewable energy generators may need to contract for these services and at the moment the benefit received for these services is not easily quantifiable.

**Initiate a reverse auction process for renewable energy power purchase agreements**
Here in the Northern Territory, it's important to assure investor certainty. The Government should develop a procurement policy and commercial terms for renewable energy projects in the Northern Territory that have clear evaluation criteria to ensure competitive tendering processes.

Power Purchase Agreements (PPAs) should be offered through a reverse auction process. Not only would this create greater investment certainty, but it could generate greater competition in the market, which in turn may put downward pressure on wholesale electricity prices.

## Conservation and Land Management

Prioritising projects that support conservation and land management can provide meaningful jobs for skilled and unskilled workers across the Territory to protect and restore our biodiversity and ecosystem values whilst supporting tourism and pastoral activities. We refer you to Pew Charitable Trust Submission and the Ernst and Young report submitted titled '*Delivering economic stimulus through the conservation and land management sector -Economic impact assessment',* of which we fully support. Conservation work in the Territory's iconic national parks during the time of reduced tourist numbers could build long term

resilience for tourism assets and protect the natural values. This work could include conservation management of weeds, fire, ferals plus maintaining fire breaks and management, tracks, trails and visitor infrastructure. We also recommend the establishment of a Gamba Army, as per our joint TERC submission with Gamba Grass Roots.

It is imperative that support for Aboriginal land management is increased, recognising the environmental, social, health and economic benefits.  We recommend increasing the capacity of ranger groups by doubling funding for the Aboriginal Ranger Grants program, allowing flexible delivery and making it available to support employment and traineeships for school leavers and school/community 'learning on country' cultural programs.

Safeguarding our Coasts

The Plan to safeguard our coasts - the NT Coastal and Marine Management Strategy (CMMS)[6] - was released in September 2019 by the NTG. It sets the course for the management and protection of the coastal and marine environments of the Northern Territory over the next 10 years. It commits to safeguarding our coasts and seas, ensuring they're healthy and productive, their cultural significance is recognised, and they continue to support our unique Territory lifestyle and livelihoods on the water. The recent report 'Economic Values of the Northern Territory Marine and Coastal Environments'[7] found that our coastal waters support over 6,000 jobs and contribute $2billion annually to the economy. This report shows what is at risk if we fail to adequately invest in the management and protection of our Top End coasts.

Our coasts are at the heart of our Top End lifestyle. With the recognised contribution our coasts make to jobs and the economy, and with threats to these coasts on the rise, we need to implement the CMMS urgently, undertaking the following:

Implementation of the CMMS to safeguard our coasts, including:

a. The development of two regional coastal plans using spatial marine planning with the involvement of Traditional Owners, stakeholders and local communities.

b. The necessary funds to implement the Plan: $1.2m per year recurrent ($4.8m over 4 years)

We also recommend urgent strategic and environmental planning for developing Middle Arm in the Darwin Harbour. This will ensure biodiversity, cultural and existing industry values are protected, providing community agreement on development priority areas.

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[6] Coastal Marine Management Strategy; https://denr.nt.gov.au/__data/assets/pdf_file/0004/729472/coastal-marine-management-strategy-2019-2029.pdf

[7] Economic Values of the Northern Territory Marine and Coastal Environments; https://d3n8a8pro7vhmx.cloudfront.net/keepterritoryseasminingfree/pages/1352/attachments/original/1527736048/NT_Economic_Values_Report.pdf?1527736048

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Other land and conservation management activities to stimulate and support jobs include:

Coastal restoration and marine monitoring
- Potential role for impacted fishing tourism businesses. Charter boat operators who know coasts, particularly near Darwin better than anybody. There will potentially be a slump in charter boat customers, this is an opportunity to get operators out on the water, keep them in the Territory, make up some of the business shortfall and protect coastal environments.
  - See Recreational Fishing Initiatives Fund[8] for further details:
- Marine monitoring, coastal restoration, fish stocks marine debris, ghost net removal

Pastoral: sustainable practice and conservation agreements
- Practical work on stations: fencing, managing and protecting sensitive environmental areas.
- Targeted investment to secure long-term practice change / conservation outcomes.

Local Government: funding for Councils to roll out programs
- Local environment improvement like greening streets, waterwise garden improvements, tree canopy, weed management etc
  - Major water efficiency improvements to Council infrastructure

Culture
Recognise the world's oldest living languages and cultures through grants for events and activities which support Aboriginal art centres, cultural centres and cultural exchanges

Recognise the global significance of Indigenous cultural sites in the NT by investing in Indigenous groups to support the protection and maintenance of sacred sites, particularly rock art sites.

Support Indigenous-led tourism ventures through start-up funds to support consultation, providing risk assessments and business planning supported by a Territory wide marketing plan encouraging Territorians to explore and appreciate special places.

Indigenous Carbon Industry (provided by the Indigenous Carbon Industry Network)
The points below by the Indigenous Carbon Industry Network were presented to the Chief Scientist Alan Finkel and Minsiter Angus Tayor as part of the response to the Technology Investment Roadmap

1. Investing in Indigenous-led scientific methods which measure the carbon benefits generated by Indigenous land and sea management, although based upon ancient traditional practices should be regarded as "new technology" given that this requires investment in new research and development as well as support for new tools (such as GIS mapping, NAFI videos, drone footage, 3D maps etc which enable Indigenous groups to manage such vast landscapes and access hard to reach areas.
2. Removing barriers to engaging in the carbon market (identified in this submission) is key to supporting this industry.
3. Referring to strategy to "Close the Gap" on Indigenous disadvantage is vital. The Government has an opportunity here to support Indigenous-led economies and address both Closing the Gap and Climate Change at the same time.
4. Supporting 'peer-to-peer' knowledge exchange between Indigenous groups as well as training in new science and technology is important.
5. Valuing the immense traditional knowledge held by Traditional Owners, respecting cultural protocols and IP as well Indigenous rights, particularly Native Title/Land rights and right to Free, Prior and Informed consent is critical to success of any venture.
6. Incentivise best-practice and sustainable, local benefits, not just exports. Expect all companies to act ethically. As we sadly saw last week Australia's laws do not always adequately protect cultural or environmental assets or Indigenous rights (refer to UN DRIP).

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[8] Recreational Fishing Initiatives Fund; https://recfishwest.org.au/rfif/

7. Purchase of Indigenous carbon credits is an investment in a culturally, socially and environmentally sustainable economy.

8. Supporting new Indigenous-led economies such as the carbon economy, cultural economy and nature-based economies will be key to Australia truly becoming a Low Emissions economy.

9. Indigenous communities are particularly vulnerable to climate change impacts, at the same time well placed to both mitigate and respond to climate change through land and sea management. The IPCC tells us that global greenhouse gas emission rates need to be cut in half by 2030 and reach zero by 2050 if we are to avoid catastrophic climate change (above 1.5 degrees Celsius).

10. Therefore our members, all Indigenous organisations, want to see Australia aim to become a Zero Emissions economy as soon as possible. The Investment Roadmap should reflect this. This means deliberately supporting low emissions economies in favour of high emissions economies where possible.

11. Supporting uptake of renewable energy technology in remote communities and outstations directly improves livelihoods and independence of communities.

12. Opportunities and challenges to economic development in remote/very remote areas are diverse and require direct consultation with Indigenous organisations. Refer to recent Inquiry into the Opportunities and Challenges of the Engagement of Traditional Owners in the Economic Development of Northern Australia.

Also, relevant to NT:

13. Increase support to the Indigenous Carbon Industry Network to support knowledge sharing and capacity building of the Indigenous carbon businesses as well as provide a point of contact for the Indigenous carbon industry.

14. Provide start-up funding program for Indigenous carbon businesses.

15. Increase resources to the Indigenous Ranger program and make grants available to support a wider range of activities beyond just infrastructure, including creation of new ranger positions, research programs, cultural programs and education programs.

Mine Rehabilitation

The Northern Territory's mining and environmental protection regulatory regimes require an urgent overhaul to bring them into line with other jurisdictions in Australia and internationally. Multiple reviews[9] have identified the following core problems with the existing regimes:

- a lack of transparency;
- uncertainty about the responsibilities of proponents, and various government departments;
- inconsistency in the application of rules;
- lack of strong monitoring, compliance and enforcement mechanisms;
- the perception of regulatory capture (whereby government departments act in the interests of the industries they are supposed to be regulating).

A number of legacy mines tarnish the Northern Territory's landscape, with estimated combined unfunded liabilities of approximately $1billion. Poor past regulation has meant that the public will generally foot these liabilities, rather than the mining companies that caused them. McArthur River Mine and the Ranger Uranium Mine now loom as future mining legacies, with impacts that will be felt hundreds of years into the future. A recent Senate Inquiry[10] found that regulation of mining rehabilitation is deficient across Australia.

The following actions are urgent to provide confidence in the NT mining industry and support expansion of jobs and stimulus in this area:
- public disclosure of the methodology used to calculate mining security bonds;

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[9] See: https://denr.nt.gov.au/__data/assets/pdf_file/0010/678421/environmental-reform-factsheet.pdf
[10] See:
https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/MiningandResources

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- legislating for "chain of responsibility" reforms to ensure that if a mining company cannot meet its environmental obligations, any related companies or persons can be held accountable in their place;
- the ongoing public disclosure of a current mine closure plan with enforceable commitments from the time the mine is initially approved.
- prohibiting certain final post-mining landforms including open pit voids, out of pit waste dumps, and above ground tailings storage facilities;
- progressive rehabilitation of mine sites during the life of the mine.

It is imperative that both NTG and Federal government funding is provided for the rehabilitation of the Rum Jungle Mine. There is long standing environmental and cultural concerns over this heavily impacted site with the failure of earlier rehabilitation attempts. There is a current EIS process[11] being undertaken for new Rum Jungle rehabilitation works, and it is vital that there is a mechanism for financial certainty for these rehabilitation works. This will stimulate local jobs and ensure legacy issues are addressed.

The NTG has an annual levy on mining securities to fund the Territory's legacy mining liabilities.  It is stated that 33%[12] of this levy is directly used to undertake works to reduce the level of impact of legacy sites. We recommend directing a greater amount of these levy funds to existing contaminated legacy mines[13] across the Territory to support local mine remediation jobs and remediated the environmental impacts.


## Water Security

Water is our most precious resource, and is essential for sustaining all life in the Northern Territory.  In particular, human health is reliant on the availability of water that is safe to drink, of adequate supply, and distributable to homes. In recent years, there have been multiple instances of water scarcity and contamination across the Northern Territory, particularly in remote Indigenous communities. These impacts will be exacerbated by the impacts of climate change, as the Northern Territory warms and water supply becomes more vulnerable. It is imperative that investment is made to secure safe drinking water, not only for human health but also to reduce the risk of extreme economic costs of water scarcity.

There are significant limits and gaps in the current regime governing drinking water in the Northern Territory.  The result is a system that privileges certain (urban, predominantly non-Indigenous) populations over others (remote, predominantly Indigenous). In summary:

- There is no general power to reserve water for drinking water supply against other uses in the *Water Act (NT)*.
- There are no mandated minimum standards set for drinking water quality across the NT under the *Water Act (NT)*, the *Water Supply and Sewerage Services Act (NT)* or the *Public and Environmental Health Act (NT)* (despite there being the power to impose minimum standards).
- Different legal regimes govern how drinking water is supplied depending on the context in the NT. Specifically, the key legislation regulating the supply of drinking water, the *Water Supply and Sewerage Services Act (NT) (WSSS Act),* only applies in the NT's 18 gazetted towns. For the 72 larger Indigenous communities and 66 of the approximately 600 outstations, this legislation does not apply. This has resulted in different "islands"[14] of drinking water governance across the NT.

Urgent reform is needed to ensure that these regulatory gaps are closed.  It is critically important that the Northern Territory Government prioritises the current and future water security of the NT to protect drinking water for all Territorians.

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[11] See: https://ntepa.nt.gov.au/your-business/public-registers/environmental-impact-assessments-register/assessments-in-progress/assessments-in-progress-register/rum-jungle-former-mine-site
[12] See: https://dpir.nt.gov.au/mining-and-energy/mine-rehabilitation-projects/about-legacy-mines/levy-and-security
[13] See: https://dpir.nt.gov.au/mining-and-energy/mine-rehabilitation-projects/about-legacy-mines/legacy-mine-inventory-and-current-projects
[14] See: https://www.hfhincubator.org/2020/06/01/nt-drinking-water-map/

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The following reforms are urgently needed to ensure safe and adequate drinking water is available and legally protected across the NT:

    a. legislate a *Safe Drinking Water Act* in the NT to provide regulatory protection and accountability for the provision of safe and adequate drinking water for all Territorians;

    b. create enforceable minimum standards for drinking water quality under legislation for all Territorians;

    c. amend the *Water Act* (NT) to include a power to specifically reserve water for future drinking water supply above other consumptive uses in the NT;

    d. legislate for a right to potable and adequate drinking water for all Territorians;

    e. develop an overarching Water Strategy for water security, sustainable use and resilience - to protect our most precious resource.

Amendments to the Water Act urgently need to occur including protections for environmental and cultural flows with the establishment of a water allocation decision making framework.

## Build and Recover for Energy Efficiency

The Northern Territory lags behind the rest of Australia, and international best practice on energy efficiency for homes and buildings, leaving Territorians highly vulnerable to climate change impacts on health, high power bills, and additional housing and building stock that will not be climate resilient.  Commitment to increased energy efficiency policies will allow the Northern Territory Government to rapidly decarbonise, whilst stimulating jobs and the building industry.

We recommend the following:

- Adopting the NCC 2019 Section J, basic minimum energy efficiency regulations for new commercial buildings.
- Increasing minimum energy efficiency standards for new and refurbished residential buildings to at least 8 stars.
- Increasing minimum energy efficiency standards for new and refurbished class 2 dwellings (apartment buildings) to a NatHERS rating of 6 stars.
- Move to 'Whole of House' energy efficiency provisions when its adopted nationally, to avoid another 13 year lag behind other parts of Australia
- Legislate all new Government buildings or Government funded projects incorporate minimum energy efficiency standards in line with NCC 2019 Section J and generate their own solar
- Implementing a program that addresses the split incentive between energy efficiency upgrades for renters and landlords
- Ensuring air-conditioner units provided to social and government housing are split system inverters and not box A/Cs to ensure efficiency and lower power bills
- Increasing energy efficiency education for residents
- Use the ACOSS Joint Proposal[15] for Economic Stimulus Healthy & affordable homes: national low-income energy productivity program to stimulate the economy as part of the Covid-19 recovery .

We also recommend the enhancement of the current NTG Smarter Business Solutions[16] program to incentivise large organisations to improve energy efficiency via:

    o Define large organisations as those that consume >750MWh/yr

    o Offer 50% funding for energy audits for large organisations with a funding limit of $8,000

    o Increase funding for energy efficiency projects (currently limited to $20,000) to $50,000 for large organisations

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[15] Joint Proposal for Economic Stimulus Healthy & affordable homes: national low-income energy productivity program; https://www.acoss.org.au/wp-content/uploads/2020/06/Economic-Stimulus-Healthy-Affordable-Homes-NLEPP-June-2020-Final-18062020.pdf

[16] See: https://nt.gov.au/industry/start-run-and-grow-a-business/grow-your-business/business-grants-and-funding/smarter-business-solutions

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- Integrate the Smarter Business Solutions program with an information strategy help organisations find out how to reduce their energy consumption.  Options to consider as part of the strategy include:
  - Fact sheets demonstrating energy efficient solutions for various types of facilities
  - NT Government led sessions in city and rural areas to provide industry-targeted information on energy efficiency options
  - Case studies of successful projects
  - Detailed summary of incentive programs from all levels of government
  - Links to helpful industry websites and contacts

## Transport  - Cycling and walking transport infrastructure

During the current COVID-19 crisis, there has been a substantial increase in cycling and walking activities[17]. Local and regional public transport networks must be developed with additional cycle paths and infrastructure to keep the new cycling population active and safe.  Investment in appropriate tree planting to shade and cool our streets and public spaces with make outdoor areas more comfortable and usable for pedestrians and cyclists whilst providing jobs stimulus.

## Waste

We recommend investment to support jobs in municipal waste systems including organic waste recycling, better local processing of recyclable materials and education campaigns. This could include solar PV recycling to support a circular renewably powered economy.

## Local Government economic recovery

Local governments are connected to their communities and are major employers, through direct employment and through contracting for service delivery. They are able to deliver big surges in jobs quickly, and also use funds efficiently to deliver long-term employment programs.

There are many proven programs being used by individual Councils, in the Northern Territory and in other states and territories, that could be rolled out quickly.

The NT Government can power a local jobs boom by providing funding, either in whole or in part, for local governments in the Territory. This could take the form of funding feasibility studies or trials, or funding programs directly, to be designed and implemented by Councils. These programs could include:
- Ongoing Green Army work to provide employment, increase the tree and shade canopy, manage weeds on Council and on adjacent Crown or private land with permission, green streets, install water-wise gardens on Council property and more;
- Solar, battery and other renewable energy installations on Council property and to cover Council operations, to reach 50% renewable energy targets on Council operations;
- Retrofitting streetlights to be more energy efficient, provide community safety and employ local tradespeople;
- Council-run programs for households and businesses to access: energy saving and housing upgrades, renewable energy installation, water saving upgrades;
- A trial of different road surfaces to reduce heat retention and radiation from roads;
- Enabling and funding Councils to manage Environmental Upgrade Agreements to allow property owners to access cheap finance for environmental and renewable energy improvements, mobilising public and private finance to create local jobs;
- Implementing a solar buyback scheme like Darebin Solar Savers[18] to get solar installed for many households, including low income households, which will drive down power bills and provide steady ongoing employment for local solar installers;
- Trials for food and organic waste management systems, including food waste bins for local residents;

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[17] See: https://www.afr.com/policy/health-and-education/inside-the-virus-bicycle-boom-20200413-p54jea
[18] See: http://www.darebin.vic.gov.au/Darebin-Living/Caring-for-the-environment/EnergyClimate#Solar-Saver

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- Local financial and food assistance for people left stranded by the federal government response, including international students and people in Australia on work visas who are unable to work or travel under current conditions;
- Implement a trial of Participatory Budgeting[19] for local green job creation projects in at least one Council area. Participatory Budgeting involves a community coming together to decide their spending priorities from a list of community projects. These projects would be designed to generate jobs, economic activity and sustainability benefits in the Council in question.
- Creating or updating disaster management and climate action plans by Council area, including climate adaptation and risk management planning.

## Local food security

The COVID-19 pandemic demonstrated the lack of coordination and representation for small scale NT farmers/sellers. For several weeks local farmers were unable to connect with their customers and sell their produce. We recommend support is needed for localised supply chain development and security to prevent future food waste and guarantee people access to local produce. This may be in the form of a larger, more comfortable venue to house a tropical Farmers Market or a coordinated local produce box delivery system.

Even during an economic downtown with rising unemployment, supermarket chains continue to throw out large quantities of edible food. There needs to be research into the scale of food waste, the reasons why it is being wasted and how more of this food might be distributed by our charity organisations.

The NT is running a buy local campaign but this does not seem to extend to food with 97% or more of our produce imported from interstate or overseas. Food is a large component of a households weekly budget and even a small shift in buying habits could reinvest money back into the Territory and support our farming industry.


We acknowledge the breadth and extent of the recovery projects and programs provided in our submission and thank you for taking the time to consider our recommendations and the resources we have referenced and attached.

We are happy to provide any further information, so please contact Shar Molloy at 0488 112 350 or shar.molloy@ecnt.org if required.


Yours Sincerely


Shar Molloy
Director
Environment Centre NT

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[19] See: https://www.participatorybudgeting.org/what-is-pb/