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Mode of delivery  
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Dear Environmental Assessment Unit,

## **Supplement to the Environmental Impact Statement, Darwin Processing Facility – TNG Limited**

The Environment Centre NT (ECNT) is the peak community sector environment organisation in the Northern Territory raising awareness amongst community, government, business and industry about environmental issues. We assist people to reduce their environmental impact and support community members to participate in decision making processes and action. ECNT welcomes the opportunity to comment on the Supplement to the Environmental Impact Statement (Supplement) for the TNG Limited (TNG) Darwin Processing Facility (the Project).

ECNT commends TNG for responding to community and industry concerns regarding the proposed waste discharges from the Project into Darwin Harbour, and in particular for the incorporation of a water recycling plant to treat liquid wastes from the Project, which will negate the requirement for off-site discharge to the marine environment and reduce the water demand from the Darwin water supply by 65%.

However, ECNT still holds some concerns about the Project, including that:

- (a) it is not clear how the waste associated with the Project will be disposed of;
- (b) there is a lack of clarity around air quality impacts and risks;
- (c) the greenhouse gas emissions associated with the project have significantly increased and there is no plan apparent for offsetting these emissions;
- (d) the regulatory arrangements for the Project are unclear;
- (e) TNG does not appear to have applied for or secured an ancillary mineral lease as is required under the *Mineral Titles Act*.

ECNT is concerned about the Northern Territory Government's proposed plans to develop Middle Arm Peninsula in Darwin Harbour, of which the Project is a core component (see map attached, which was released by the Northern Territory Government as part of tender documentation last year). If these plans progress, there will be significant cumulative impacts on air quality, greenhouse gas emissions, waste discharges, and the habitat for many threatened or protected species including migratory shorebirds, turtles, and dugongs. There may also be significant cumulative biodiversity impacts associated with land clearing and habitat fragmentation. Further, there may be adverse impacts on industries such as pearling, ecotourism, barramundi, not to mention the recreational fishing industry. ECNT is concerned that project-based and piecemeal environmental assessment of developments on the Middle Arm Peninsular will be inadequate to appropriately assess the impacts on Middle Arm (and Darwin Harbour more broadly) of these proposed developments. ECNT believes that a comprehensive and strategic environmental

assessment of Darwin Harbour is needed to appropriately address community, industry and environmental concerns about these proposed developments as soon as possible.

### **Waste associated with the Project**

It appears from the Supplement that TNG proposes to concentrate and dewater the waste products associated with the Project, and dispose of them as solids. The amount of toxic waste solids is likely to be very significant (approximately 527,000 tonnes per year). However, TNG does not appear to have a plan for how these wastes will be disposed of. It is of utmost importance that TNG's proposal for disposing of this waste is disclosed, and properly assessed. Without this information on disposal the environmental impacts of the waste materials are unknown and unassessed.

While the Project has significantly reduced its water use, ECNT has concerns about the cumulative water impacts for the proposed development of Middle Arm (including from the Project).

### **Air quality concerns**

ECNT has concerns about some matters in the air quality assessment at Appendix G. In particular, ECNT notes that:

- (a) The emissions of PM<sub>2.5</sub> levels at the sensitive receptors are very high, and may be concerning for the workers on site. It is not possible to tell exactly where they exceed the air quality national criteria, so the level of risk is unclear;
- (b) At the stacks, TNG will exceed air quality criteria for PM<sub>10</sub> 24Hr, PM<sub>2.5</sub> 24Hr, PM<sub>2.5</sub> annual, NO<sub>x</sub> 1 hour, SO<sub>2</sub> 1 hr and Cl<sub>2</sub> 1 hr. ECNT believes TNG could be doing more to reduce emissions.

### **Greenhouse gas emissions**

ECNT is concerned that the greenhouse gas emissions for the Project have increased by 15%, up to 1,192,401t CO<sub>2</sub>eq per annum. Using the 2018 national greenhouse gas inventory, this is equivalent to more than 7% of the Northern Territory's annual greenhouse gas emissions, and is roughly equivalent to the carbon emissions saved annually by the Indigenous carbon (savanna burning) industry. While the Northern Territory Government has made a commitment to reach net zero emissions by 2050, ECNT is concerned that the Northern Territory's greenhouse gas emissions have increased by 14.6% from 2005 levels, and are continuing to rise. The promised "large emitters policy" has not been finalised, and may not even be triggered by the Project. This creates uncertainty for the public, and for investors, not to mention accelerating the impacts of climate change. It is imperative that TNG commits to offsetting the entirety of the emissions generated by this project if it is to proceed, and that this be imposed as a condition of the Project's approval.

### **Tenure and Regulatory Framework**

ECNT has concerns about whether TNG has the appropriate tenure for this project. In particular, ECNT notes that the Project falls within the definition of "mining activity" in Northern Territory law and thus should have a mineral lease granted under the *Mineral Titles Act (NT)* which would give TNG the right to process minerals mined at Mount Peake. Further, TNG should have an authorisation (and a mining management plan) approved under the *Mining Management Act (NT)* or the Project may be unlawful. It is not clear from the EIS or Supplement how this project is to be authorised or regulated moving forward. It is vital there is clarity about this, and that TNG complies with requirements designed specifically to regulate mining activities under the relevant legislation.

Yours Sincerely

Shar Molloy  
Director

Kirsty Howey  
Co-Director