

RE: Regulation of mining activities consultation paper (Environmental regulatory reform, Northern Territory.)

Comments relating to assessment of environmental impacts, in particular groundwater, by Northern Territory Government agencies.

For these proposed changes, as outlined in the discussion paper, to work, it will be necessary that assessment agencies (NT EPA?) have designated personnel with requisite experience in all facets of mine environmental matters and relevant NT legislation and responsibilities solely focussed on these tasks.

As it stands with the current CIS comment system within the NT government, scientists, without warning, are handed many hundreds of pages of mine environmental documents and data and demanded to provide technical assessments often within only a few business days. While the enormity of these sudden and unscheduled tasks are most disruptive to the day to day work plans of government agencies, the often very tight schedule within which assessment is sought is fraught with danger as important factors may easily be missed in the haste to get comments out.

Surely, given the responsibility and importance of Government to manage the environment, a better system than seeking unscheduled and rushed ad hoc comments from NT agency scientists without any mining industry experience should be introduced to support these proposed legislation changes. If a standalone group of designated personnel to deal with these matters was created then the need to consult other NT agency scientists on aspects of an environmental assessment should be rare and only confined to particular identified aspects.

To assist and streamline the mining approval process these legislation changes should also be accompanied by the creation of a clear unequivocal set of guidelines that outlines the environmental assessment and management requirements expected of mining operations. This way all proposals could be assessed against each specified requirement rather than having to search through hundreds of pages of documents to see if a particular environmental aspect has been addressed adequately. Other jurisdictions such as the Independent expert scientific committee on coal seam Gas and large coal mining development

<https://iesc.environment.gov.au/publications/information-guidelines-independent-expert-scientific-committee-advice-coal-seam-gas>

have developed guidelines on water information considered critical to assess proposals. The NT government should seek to emulate and enshrine these sorts of guidelines for water and indeed all other environmental aspects of mining within this proposed new legislation. Creation of guidelines will streamline both the compliance by companies and government assessment of mining related environmental matters.

While the creation of a standalone scientific team solely focussed on these environmental mining matters is desirable some may balk at creating new full time equivalent positions to do these tasks. If funding of these positions was sourced by way of increasing mining application and operation fees along with a designated proportion of mining royalty payments' then creation of this team could be done without increasing strain on the NT government budget. The benefits of reducing bureaucracy by fast-tracking the environment assessment along with efficiency gains associated with the freeing up existing Government scientific personnel from the assessment task make this proposal worthy of consideration.

Thus it is my belief that these legislation changes should be accompanied by the setting up a designated standalone unit of Government scientists that is capable of assessment of all

environmental aspects of mining proposals. This unit and the mining industry should be supported by the creation of a clear set of environmental guidelines that can be followed by industry and be used by the N.T. Government to evaluate proposals.