



Dhimurru Aboriginal Corporation

PO Box 1551, Nhulunbuy, NT 0881
11 Arnhem Rd, Nhulunbuy, NT 0880

Ph: (08) 8939 2700

ABN: 95 520 121 809

ICN: 1558

Web: www.dhimurru.com.au

Minister for Environment Eva Lawler
Dept of Environment, Parks and Water Security
Northern Territory Government

11th May 2021

Subject: Draft declaration – proposal to prohibit subsea mining

To the Hon Eva Lawler,

I am writing to you to applaud your decision to prohibit subsea mining, after assessing submissions received between September and November 2020 regarding the review of seabed mining in the NT – environmental impacts and management.

The economy of the Northern Territory is in bad shape, but to look at seabed mining as a solution to job and wealth creation is short sighted and puts some of our greatest natural assets at risk. This in turn could also jeopardise some of our most important sustainable industries such as recreational and commercial fishing and tourism.

The NT has some of the most intact tropical marine environments in the world with relatively few issues regarding species or habitat threats. Species and habitats are under increasing pressure from effects such as sea temperature rise, sea level rise, ocean acidification and marine debris. The introduction of additional pressures from subsea mining such as sedimentation, reduced light conditions, noise pollution and altered currents due to changes in the topography of the sea floor will no doubt place additional pressures with unknown consequences. The impacts of subsea mining on the ecology of marine habitats have been documented to possibly never recover to their previous productivity and ecological complexity. The Advisian Report states that active rehabilitation of the seabed is not usually feasible and generally relies on natural recovery. This resulting loss of ecosystem function can have unknown flow-on effects into neighbouring areas and habitats, and we simply do not know what effects this may have on our marine areas.

The State of the Environment Report 2016 identified that a lack of existing baseline knowledge of NT marine environments is one of the greatest uncertainties related to understanding the impacts of seabed mining. Without a good knowledge of the habitats and species that inhabit them, their interconnectivity and environmental services they provide, we can't be certain of the impacts. How can we risk causing a collapse of these marine systems if we don't understand their role and importance? It is totally irresponsible to allow the impact, and then to realise the mistake when the damage is done and can't be remediated.

Indigenous Australians do not differentiate between land and sea. It is all connected through song lines, stories and cultural sites. The sea country is as important for sites of cultural importance as with the land.

The notion of bulldozing the sea floor and disturbing sites of cultural significance would be extremely distressful to Traditional Owners of these areas. The likely impacts on marine life would also significantly impact Traditional Owners ability to live on the seafood such as turtles, dugong, stingray, fish, crabs and oysters that are such an important part of their diet.

The Mineral Titles Act and the Mining Management Act were written to manage land-based mining operations and are not necessarily suited to the very different circumstances encountered in mining the sea floor. The NT Government does not have a good history regarding the regulation of land-based mining, particularly concerning the containment of pollution and successful rehabilitation of mines. The prospect of the NT Government responsibly and effectively regulating an industry that operates in a mobile marine environment, where impacts cannot be readily observed is highly unlikely.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'L. Playford', written in a cursive style.

Luke Playford
Sea Country Facilitator
Dhimurru Aboriginal Corporation
Ph 0499037753
luke.playford@dhimurru.com.au