

Extractive Industry Association of the Northern Territory Inc.

Dear Sir/Madam,

In response to your call for Public Comment on the Draft Declaration to Prohibit Seabed Mining, we the Extractive Industry Association of NT Inc. (EIA) reiterate the content of our submission (Nov 2020) to the “the review of Seabed Mining in the Northern Territory – Environmental Impacts and Management” and we make a further contribution below against this Draft Declaration to Prohibit Seabed Mining.

Developing the Northern Territory through harnessing its natural resources e.g., sunshine, minerals, soil, water, etc., is the current Gunner Governments mantra. Prohibiting the capturing of one of those many natural resources, seabeds, is directly opposed to that develop and grow proposition. In particular, this resource, sand, is likely to be critical, the foundation blocks of any other and all other proposed development locally and/or further afield. E.g., without sand you do not have roads, rail, buildings, gas, etc. and there is already a worldwide shortage of sand.

EIA challenges many of the STATEMENT OF REASONS for the draft declaration of prohibited action: Subsea Mining. In general, many if not all the reasons in principle could be applied to terrestrial mining and or other use of natural resources, yet we harvest them under appropriate regulation in Environmentally Sustainable ways.

Our direct response to each reason(s) below,

#7 fails to even mention the value to the economy, therefore we assume does not consider the value to the community of mining this resource. EIA proffer it could and would be enormous.

#11 to #19 are all valid observations however could in principle be applied to the harvesting of all-natural resources which we currently do and or propose to do effectively and sustainably with great benefit to society.

#20 it is possible and likely that there are some “economic features of the environment that are worthy of protection” however this is against unquantified economic value of sustainably harvesting the resource as indicated in the last sentence of this reason “benefits of an untested industry”. EIA propose that this is a lost opportunity to lead the globe in Subsea Mining development (like we have

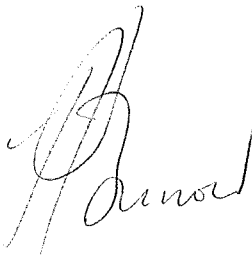
in offshore and soon to be onshore gas) and suggest strongly that unless we endeavour to develop this resource, we will never know its ultimate value and never gain the ability to harvest it professionally and sustainably.

#21 to #36 note there are potential impacts and uncertainties however this is true for terrestrial mining as well and through led and managed exploration, regulation, and operation this EIA suggest very valuable resource again, could be sustainably harvested for the value of the Northern Territory. If the entire resource is put under prohibition, we will never learn about it and how to develop it in a sustainable way.

#44 is the height of inconsistency. It allows mining of the same resource to waste, most likely dumped on top of the protected resource and additionally the exempt activities will be major users of a similar resource sourced from terrestrial areas e.g., concrete for pipelines, tunnels, wharfs etc.

EIA strongly disagree with the proposed prohibition of Subsea Mining, based on the principle that all the Northern Territories Resources should be available for harvest under a transparent, robust regulatory and policy framework that promotes ecological sustainable development and establishes clear expectations on industry. None should be locked away forever on the whim of public opinion and/or due to current lack of knowledge, rather this should be the catalyst for intelligent Territorians to learn and develop ways to develop and grow our great region.

Yours sincerely



Tim Burrow
CEO

16th June 2021