
From: David Liddle
Sent: Monday, 3 December 2018 1:26 PM
To: environment policy
Subject: Environmental Regulatory Reform

Dear Sir/Madam,

Thankyou for the opportunity to input into the discussion regards environmental regulatory reform in the NT. I support the NT Government in the inclusion of principles of ecologically sustainable development in the draft Environmental Protection Act. I also support the efforts to develop a more broadly applicable and consistent approach to the approval of projects.

In particular, I support the requirement for an environmental approval that is applicable across a broad range of projects. This is a significant improvement on the previous system whereby requirements varied substantially from one industry or activity to the next. Consistency across a broad range of development actions has the potential to provide benefits of a more certain operating environment for proponents and more consistent environmental outcomes.

The capacity for strategic assessments and that an action includes “an activity or series of activities” is strongly supported. These inclusions provide the flexibility for forward planning and consideration of cumulative impact from multiple small actions.

Key components for the revised system to build and maintain credibility in the decision making process in the NT include public involvement and transparency. With regard to public involvement it is important that third parties can comment upon and make submissions regards proposed actions. Thus with regard to referrals, I support the invitation of “... interested persons to make a submission to the NT EPA about the referral ...” In addition, public confidence in the revised system will be enhanced by provision of powers to the NT EPA to issue a “Call-in notice” and “stop work notice”.

A gap that I perceive in environmental legislation in the NT is the capacity to protect ecological communities. Threatened species and essential habitat are addressed under the Territory Parks and Wildlife Conservation Act, thought given the absence of declaration of any essential habitat, this has the appearance of a “lame duck” capacity. I encourage the consideration of ecological communities under the Environmental Values. A further requested refinement is to have a system in place whereby clearing or similar modification and loss of habitat is assessed on a catchment/ sub-catchment/ or similar spatial scale and loss of greater than a certain percentage of vegetation communities within an area acts as a trigger for close scrutiny of any proposal for further clearing or modification.

Regards

David Liddle