



16th December 2019

Department of Environment and Natural Resources
Level 1, Goyder Centre
25 Chung Wah Terrace
Palmerston NT 0830

To Whom It May Concern:

REF: Submission – Draft Environmental Protection Regulations 2019.

NT Farmers as the peak industry body represents all plant-based industries in the Northern Territory. Our industry currently produces in excess of \$300 Million per year and has an ambitious target of \$600 Million in post farm gate revenue by 2030. One of the key difficulties in achieving this level of growth is access to suitable land and water. In order to develop a broadacre cropping industry it is critical to have workable, practical and understandable legislative and regulatory frameworks.

Our members genuinely concerned with any fundamental changes to the environmental approvals process. There is a level of skepticism that Environmental Protection Regulations will provide the supports for economic development in the Northern Territory.

Members understand the need to protect high conservation value areas within the Northern Territory. It must be noted that the Northern Territory is largely underdeveloped with over 97% of the territory still remnant vegetation.

NT Farmers would like to make the following observations in relation to the 'DRAFT' regulations;

1. Environmental Protection Regulations will add additional significant costs to development in the Northern Territory. Land Developers already incur significant costs for preparation of Water Licensing, Non-Pastoral Permits and Tree Clearing. This additional level of complexity and costs may deter investment.
2. The current inadequacies and timeframes for development approvals have contributed to a general lack of confidence in the Territory's capacity to manage the environment, and to attract and facilitate industry investment. Adding additional approvals will do little to give confidence to industry to invest.

3. The 'proposed environmental impact assessment and approval timeline' is a welcome addition to the process, provided these timeframes are adhered to and that the process is not impacted by over bureaucratic personnel inflicting additional scrutiny to an already lengthy and expensive process.
4. That the EPA work with industry to develop a clear communication strategy that includes face to face meetings with agricultural businesses to fully explain the new processes. A detailed educational and communications plan needs to be developed and implemented to ensure knowledge of the Environmental Protection Regulations 2019.
5. The need for any additional approvals, and the complexity of these, will depend on the scale and location of a proposed development – for example if it's a very large area to be cleared, if there's a large water extraction requirement, or it overlaps with areas of high environmental value. In these cases, the development may need to be referred to the NT EPA for consideration of whether assessment under the Environment Protection Act is required. The NT EPA may determine there is no need for further environmental impact assessment, or it may require assessment under one of the tiers, up to a full EIS. NT Farmers understand that the new Act won't impose additional regulation beyond what already exists under the current Environment Assessment Act.
6. NT Farmers understands that there are no thresholds where development will be discouraged, but there may be limits on the extent of development in certain areas e.g. there is not enough water available, or there are physical constraints on land suitability. NT Farmers supports having no size constraints on land developments.
7. NT Farmers believe government will develop additional regulations for the regulation of surface water harvesting (especially wet season flood harvesting and storage); and the consideration of greenhouse gas emissions in a whole range of development types. NT Farmers would be concerned if these regulatory developments could trigger the need for additional regulatory burdens.

Given the low levels of agricultural development within the Northern Territory and the large amounts of remnant vegetation the need for development is paramount to the success and prosperity of rural Territorians and their communities.

Regards

Paul Burke

Paul Burke
Chief Executive Officer