Jacqueline Arnold
PO BOX 9124
ALICE SPRINGS 0870

Thank you for the opportunity to comment on the draft Terms of Reference for a Strategic Assessment of the Middle Arm Sustainable Development Precinct, in accordance with section 146(1B)(b)(ii) of the *Environment Protection and Biodiversity Conservation Act 1999.*

General

This proposal is of immense concern to me. I have no confidence that the arrangements established by the terms of reference (TOR) will allow the concerns held by I believe the vast bulk of Territorian's concerns about this astounding proposal to situate a heavy industry precinct on between a major urban centre and a fragile tidal harbour to be addressed.

As a life-long Territorian I am very interested in the potential impacts of this project on the Territory. I only became aware of this project through the ECNT. The community engagement has failed dismally. Furthermore process has been hard to participate in despite having a post graduate level of education, experience working with highly technical documents and able to take leave from work to engage.

Engagement tools appear to be directed at stakeholders with profit motives (businesses) not the general public, who appears to be expected to bear the costs of this project.

I call on the Chief Minister to abandon this precinct or first undergo a proper planning process to establish whether Territorians support the proposal before trying to push this through the EPBC Act without establishing social licence within our community. As it stands it appears to be supported by the industry beneficiaries but by only very small fraction of the public.

Specific concerns

While firmly believe the project should be abandoned, I would also like to raise the following specific problems with the draft TOR.

Name of the proposal- The characterisation as a "sustainable development precinct" is misleading given its:

- Focus on petrochemical and mineral processing that results from mining activity, which is by definition, is unsustainable.
- The International Panel on Climate Change Working Group III has highlighted that all global modelled pathways that limit warming to 1.5°C (>50%) with no or limited overshoot, and those that limit warming to 2°C (>67%), involve rapid and deep and in most cases immediate GHG emission reductions in all https://www.ipcc.ch/report/ar6/wg3/downloads/report/IPCC_AR6_WGIII_SPM.pdf

- Investing in a precinct the viability of which turns upon protracted gas extraction for at least fifty years which is an anathema to sustainability
- The life cycle of the project is only 50 years so is not looking to benefit future generations who will live with the lasting impacts to the environment, it is short term.
- Characterisation of current land use as 'undeveloped' is misleading, it excludes land use by native animals and plants – it's not 1822 – we've moved beyond terra nullius.

Form of the Strategic Assessment Approach

- The SEA approach focuses on the assessment and approval of 'a policy, program, plan or methodology', rather than seeking approval for individual projects.
- It does NOT allow stakeholders to understand or gauge the acceptability of impacts, nor understand how negative impacts will be avoided and managed.
- I am concerned that treatment of this area as a precinct without being accompanied by a development plan describing specific activities means major concerns associated with particular activities within the precinct cannot be understood at the start. This risks locking-in an unwelcome heavy industry area based upon a comparatively innocuous "sustainable development precinct" when in fact the public may be fundamentally opposed to the activities within it and impacts caused by it (e.g. petrochemical plant, dredging, mangrove damage, pollution incidents in Palmerston, health risks, low property values).

Premature to enter this agreement

- The available information, including desktop assessment, literature reviews and baseline studies have identified that many environmental, social, cultural and economic values that have the potential to be significantly impacted through the project. However it is not clear what the impacts are and at face value they seem excessive and unlikely to be manageable.
- It is premature to proceed before further comprehensive scientific and social impact studies have been undertaken to allow the extent and types of risks to be known.

Regional security

- With increasing scarcity and competition for global resources, and increasingly fractious regional relations I believe there is a significant risk that the precinct could be a target for attack from a foreign power. Placement of a facility so close to a major city like Palmerston warrants closer consideration.

Thank you for considering my submission.

Kind regards

Jacqueline Arnold