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To Whom it May Concern,

Integrated Hyperscale Data Centre Campus (EPBC Ref 2026/10560)

INTRODUCTION

Thank you for the opportunity to comment on this proposal.

We firmly object to this proposal. It cannot be conducted safely as:

1. There is no binding National regulatory framework for AI data centres;
2. The framework to allocate water under the Georgina Wiso Basin Water Allocation Plan is inadequate;
3. It appears the Native Title holders have not been consulted regarding either sacred sites or cultural values or occurrence of listed species;
4. The full and compounding impacts of the proponents' ambitions for the Murranji, including Ammonia production under 'Project Sol' are not included in the proposal;
5. The compounding risks of nearby proposals like the Muckaty solar project are not considered.

Notwithstanding these general objections, we submit the proposal should be considered a controlled action under the EPBC act because of:

1. Risks to EPBC listed species;
2. Risks to migratory birds;
3. Downstream impacts on listed species inadequately protected ecological communities and impacts on subterranean fauna;
4. Risks to sacred sites and cultural values;
5. We also raise numerous concerns and flaws associated with the proposal, which will cause significant cumulative environmental impacts putting species and ecosystems at risk.

DISCUSSION

EPBC listed species at risk are inadequately described, not based on site data and unprecautionary

The Desktop assessment by Ecoz is insufficient and diminishes the threat posed to EPBC listed species.

It draws to heavily on the Beetaloo Strategic Regional Environmental Baseline Assessment. This is by definition is a regional report and unsuitable for a description of site impacts.

It identifies only 3 species with suitable habitat greater bilby, northern blue-tongued skink and yellow spotted monitor at medium or high risk. No listed bird species are identified as being at a more than low risk. This is unconvincing, given the lack of field data and proximity to healthy lands on the Murranji Aboriginal Land Trust. Species for which there is suitable habitat should not be excluded without field data.

While it appears there were some local field studies done for bilbies for the SREBA, in general we understand little field work has occurred on site. We are therefore concerned that in section 2.7.1 of the Desktop Ecological Report reports seems to use back to front logic to infer there are no large trees with hollows and hence no risk of interfering with the many listed species that live in hollows because there are no records of any species that live in trees with hollows. Until relevant fauna and tree surveys are done species tree hollows and potential threatened species should be assumed as occurring and the risks significant.

We also note neighbouring properties with similar vegetation have records of other listed species like northern brush tail possum.

Given the enormity of this proposal, this application should have been informed by more than desk studies.

Culturally important species and insects not considered and could point to more EPBC listed species

The applicant has not sought advice from the Native Title Holders, nor drawn from resources like *Jingulu and Mudburra Plants and Animals: Biocultural knowledge of the Jingili and Mudburra people of Murranji, Marlinja, Warranganku (Beetaloo) and Kulumindini (Elliott) Northern Territory, Australia.* [1]

Furthermore application does not report consider culturally significant species and species that may be associated with sacred sites. Eg sugarbag on bloodwoods which are documented as being common across the area.

Risks to specific species – greater bilby

This area is clearly a stronghold for a species that is facing many threats across its range. Bilbies are already under severe threat from the nearby Muckaty solar precinct, which seeks to clear 1.5% of bilbies' remaining occupied habitat across Australia. This proposal adds to this tragey. This loss however is even more acute as it is concentrated on Mudburra country. The loss of bilby populations should be considered in the context of their loss on Mudburra lands.

Impacts on birdlife on site and in internationally significant wetlands and migratory birds covered under international agreements

1 https://www.researchgate.net/publication/330263590_2018_Jingulu_and_Mudburra_Plants_and_Animals_Biocultural_knowledge_of_the_Jingili_and_Mudburra_people_of_Murranji_Marlinja_Warranganku_Beetaloo_and_Kulumindini_Elliott_Northern_Territory_Australia

US data estimated, an average 456 birds die per square kilometre of panels annually[2]. These figures cannot be directly translated to this extraordinary proposal of this scale, however these global averages applied to approximately 70 square kilometres of solar panels would predict an annual loss of more than 30,000 birds. This warrants extreme caution and the highest level of rigour in through the assessment process and consideration as a controlled action, given proximity of the site to Longreach waterhole, Lake Woods and probable flyways for migratory birds. This caution is not evident in the Ecoz Terrestrial Ecology Report.

Proximity to internationally important bird habitats Lake Woods, Longreach Waterhole and Newcastle Waters

Lake Woods is likely to meet at least five of the criteria for listing as a Wetland of International Importance under the Ramsar Convention, including criterion 1: rare or unique example of a wetland type; criterion 2: supports threatened species or communities; criterion 4: provides refuge or supports a critical life-cycle stage for important species; criterion 5: important wildlife aggregation site with >20,000 waterbirds; and criterion 6: regularly supports >1% of the individuals in a population[3]

The Ecoz ecological assessment does not seriously consider risks to species in these nearby internationally important wetlands*. A proposal of this size can be expected to have impacts on these nearby downstream receptors, especially given its proximity to drainage lines (Bucket Creek) and Mitchell Grass Downs areas that may be prone to inundation to the immediate east of the proposal. The threats to species occurring in these areas posed by this proposal need to be considered with mitigations proposed that offer satisfactory protections for EPBC Protected Matters.*

Impacts on migratory birds

At least 24 faunal species recorded at Lake Woods are listed under international conventions or bilateral agreements protecting migratory animals (Harrison et al. 2009)[4]. The location may also be directly underneath the flyways for migratory birds covered under international agreements.

We are concerned the Ecoz report underestimates the risks to migratory birds. In section 3.3 it states 'Generally, a project will not have a significant impact on migratory species unless there is important habitat for, and/or significant occurrences of, migratory species.' Given the vast solar arrays, and potential for the Lake Effect[5] *we dispute this conclusion. The applicant has not demonstrated the proposed solar panels are not a threat to passing migratory birds.*

[2] P.A. Fleming (2025) All that glitters – Review of solar facility impacts on fauna, Renewable and Sustainable Energy Reviews, https://doi.org/10.1016/j.rser.2025.115995

[3] https://territorystories.nt.gov.au/10070/532083

[4] Harrison, L., McGuire, L., Ward, S. Fisher, A., Pavey, C., Fegan, M. and Lynch, B. (2009) An inventory of sites of international and national significance for biodiversity values in the Northern Territory. Department of Natural Resources, Environment, the Arts & Sport, Darwin, NT https://territorystories.nt.gov.au/10070/622060.

[5] P.A. Fleming (2025) All that glitters – Review of solar facility impacts on fauna, Renewable and Sustainable Energy Reviews, https://doi.org/10.1016/j.rser.2025.115995

Impacts on bats and insects[6]

In addition to birds, bats and insects are impacted by solar panels through habitat loss and fragmentation, altered microclimate, and creation of novel habitat. Many animals, including insects and birds, have well-tuned polarisation vision and use the information from polarised light for navigation and to locate resources Polarised light pollution i.e. “light that has undergone linear polarisation by reflecting off smooth, dark buildings, or other human-made objects” can represent an ecological trap for birds and insects. Solar panels would also reflect moonlight, and reflected polarised light from panels could be perceived as waterbodies by bats.

Finally, this application like every clearing application in the NT does not mention insects. This may include EPBC Act listed species, as well as species that are vital to ecosystem function and/or of cultural/sacred importance.

Impacts on water resources and groundwater dependent ecosystems

The Georgina Wiso Water Allocation Plan for the area lacks any environmental protections; does not make evidence based environmental or cultural water provisions; was written without the normal water advisory committee and gazetted without responding to the many public concerns raised during consultation.

These shortcomings were raised by the Productivity Commission in 2024:

The Commission assessed some processes for water planning in the Northern Territory as not NWI compliant. In particular, that water allocation plans are not binding on decision makers and that there is an absence of statutory protection for water allocations for the environment7

The problematic Georgina Wison Plan has not been redrafted. There remains no binding environmental protections.

Furthermore there water available for general consumptive uses is being rapidly taken up by big industries for no cost. There is 13,178 ML/yr available for this use but this is subject to recent applications like Dungowan Station (4,737 ML/yr). The 4GL/yr for this proposal, plus additional demand for the future Ammonia plant means that groundwater is rapidly being taken by a small number of very large industries.

Groundwater dependent ecosystems

Groundwater from the area is in a poorly defined flow system that eventually discharges to terrestrial or aquatic groundwater dependent ecosystems, like Flora River and Mataranka.

Subterranean groundwater dependent ecosystems can also be expected to occur in the limestone aquifer beneath the site and locally. *Subterranean GDEs are not considered in the ECOz report but should be. These may include rare or unknown species.*

[6] P.A. Fleming (2025) All that glitters – Review of solar facility impacts on fauna, Renewable and Sustainable Energy Reviews, https://doi.org/10.1016/j.rser.2025.115995

[7] https://assets.pc.gov.au/2025-10/Water%20refrom%20overview.pdf?VersionId=4HZvgnWAJvJDrFyvLgTepv1suFCHO6D_

Groundwater Pollution risks

Management and disposal of saline brine
We are concerned that brine generated from use of groundwater for evaporated cooling could contaminate aquifer water quality, putting at risk and subterranean ecosystems, including rare species. It could also jeopardise the inherent values of the groundwater and potential for drinking

Pollution accommodation and infrastructure.
The proposal involves an enormous construction workforce of 4,300 personnel and up to 500FTE permanent workforce. This includes all the contamination risks associated with a small town like disposal of wastewater, and storage of contaminants associated with industrial uses/airfield. These introduce surface and groundwater contamination risks.

Surface water pollution risks to protected matters

Solar arrays of this scale can be expected to change the size and velocity of stream flows, risking erosion and flooding; and carrying sediments and other pollutants to Lake Woods. Surface water pollution risks can be expected from other industrial activities and large population at this site. As noted this location is in the catchment of Lake Woods and its significant tributaries. As these support important bird habitats, including threatened species and migratory birds covered under international agreements these risks need to be addressed through a surface water protection plan.

GHG Emissions

We object to the avoidable greenhouse gas emissions for an energy intensive data centre. There is insufficient industry legislation to ensure that energy demands are minimised or necessary (see below on lack of binding rules).

We also object to the GHG emissions from using fracked gas and land clearing. Emissions from clearing for 7,000 ha of solar panels, conservatively estimated at 100 tonnes/ha, represents emissions in the order of 700,000 tonnes of completely avoidable emissions. These will be incurred at a time when emissions are to be avoided. We understand in the NT these emissions are not required to be offset.

Cumulative impacts on Murranji Station and in region

This is not the only proposal for the Murranji Station – a large Ammonia production facility (Project Sol) is proposed. There is also the enormous Muckaty Station proposal, multiple large cotton irrigation proposals and fracking proposed/ underway in the region. This region is transforming with no proper considering of the consequences of inclusion of people most impacted.

All the proposals for Murranji should be considered at once.

Decisions for the region should not be made incrementally. A regional plan that is supported by the people from the region needs to be prepared first.

Federal Governance AI Datacentre shortcomings

Lack of binding rules on data centres.

The Federal Government advice on datacentres is vague and compliance is voluntary[8]. The term 'should' is used throughout this guidance. There are no explicit laws and specifications regarding location, design, construction and operation and no single overarching Federal Approval required. The absence of specific guidance means there is immense uncertainty as to how this facility will be built, and no assurance that it can be regulated.

Two stand out concerns from the Federal guidance are the statements:"
1. "Energy-intensive data centre proposals not closely aligned with the expectations will not be prioritised by Commonwealth regulatory assessments." For proposals in the NT, where access to land, sun and water are free and largely unencumbered; and we are close to lucrative SE Asian markets this misunderstands the regulator proponent dynamic – these highly profitable global companies do not need support or prioritisation, they need strict regulation.

2. 'The expectations work alongside existing national, state and territory laws. They do not alter any obligations to comply with Australian law or to engage in good faith with regulators, including in areas relevant to data centres, such as data, cyber and national security, privacy and waste management.'

Without intending any disrespect to the NT Government it should be recognised that as a very small jurisdiction the NT is not well placed to regulate a rapidly changing, emergent industry with extremely powerful actors. Federal laws and regulations are needed. Recognising this proposal as a Controlled Action will facilitate proper Federal involvement in regards to EPBC Act Protected Matters.

Thank you for your consideration.

Kind regards,

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Co-administrators, Letters for the Environment Central Australia

Written with respect on unceded Central Arrernte lands

[8] https://www.industry.gov.au/publications/expectations-data-centres-and-ai-infrastructure-developers