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To Whom it May Concern,

Project Ares

INTRODUCTION

Thank you for the opportunity to comment on this proposal. I am deeply concerned by this proposal which is an enormous in scale, involves immense and avoidable risks and a great deal of uncertainty. I therefore:

1. Object to proposal for the following general reasons:

The proposal cannot be conducted safely and properly assessed as:

a) There is no binding Territory or National regulatory framework for AI data centres. this creates uncertainty as to what best practice is and the standards to which it will be built;
b) It involves avoidable and unnecessary use of fossil fuels during a global climate crisis;
c) The framework to allocate water under the Georgina Wiso Basin Water Allocation Plan is inadequate;
d) The full and compounding impacts of the proponents' plans for Murranji Station, including Ammonia production under 'Project Sol' are not included in the proposal but must be;
e) There are compounding risks from nearby proposals like the Muckaty solar project are numerous large irrigation proposals. These need to be considered in total through a plan for the region before individual proposals are considered.
f) It is unclear who Project Ares will supply services to. There is no evidence demonstrating that the end user is doing everything possible to minimize datacenter demand and hence its environmental footprint, nor that it is not for an environmentally harmful end use.

For these reasons this proposal should be rejected. Furthermore the NTEPA should pause consideration of any proposals for hyperscale datacentres until a regulatory framework and NT wide plan is in place.

2 Object to proposal on the grounds that it is incompatible with the following EPA decision making principles:

a) Principles of ecologically sustainable development
b) Management hierarchies

3. Submit that even if the objections above were resolved, the proposal must be subjected to the highest level of environmental impact assessment, because of concerns related to the environmental factors: land, water, air and people.

These concerns are expanded upon in 'Discussion & Further Notes' (following).

DISCUSSION & FURTHER NOTES

Part 1 General objection

In addition to points a). to g). raised in the introduction I am concerned that the NT Government does not have any framework or laws specifically for regulating hyperscale datacentres. In itself Project Ares is enormous, however the NT Government is apparently dealing with 12 datacentre proponents[1]. Without standards and guidelines nor a spatial plan for the industry, this 'rollout' will be based on optimising private developer interest, not the public interest. It is certainly not based on seeking to minimise environmental harm.

Furthermore, Federal government advice on datacentres is vague and compliance is voluntary[2]. The term 'should' is used throughout this guidance. There are no explicit laws and specifications regarding location, design, construction and operation nor is a single overarching Federal Approval required. The absence of specific guidance leaves immense uncertainty as to how this facility will be built, and no assurance that it can be regulated.

There are many examples where there is too much room for developer discretion in design choices and no certainty as to the outcome. Two crucial areas where the proposal is based on developer preference not rules are cooling systems and power sources. Best practice needs to be enshrined in legislation otherwise poor locations will be chosen based on price, shortcuts will be taken and proponent design decisions will be based on 'price points' not harm minimisation. This is the case for Project Ares with its decision to locate on cheap land close to Lake Woods and use Beetaloo gas as 'firming power'. These are business decisions, not best practice for environmental compliance.

The NT previously established a moratorium on fracking to allow a public inquiry and put in place many measures to build more certainty as to whether and how this industry would operate. Given the scale of risk posed individually by Project Ares and collectively by this emerging industry a similar stop to assessments and public inquiry is needed.

Part 2 Principles of environment protection and management

PRINCIPLE	DETAIL	OBJECTION
	18A Principle of proportionality Decision-making processes should ensure that decisions or actions directed at minimising harm or a risk of harm or impact to the environment are	• We do not know who the end user of the datacentre will be and therefore the uses' impacts. There are no regulations in place to ensure AI and other services are minimising their environmental footprint. It appears this application contains no measures whatsoever to minimise the harm caused by the data storage and processing.

[1] https://www.abc.net.au/news/2026-07-01/data-centre-planned-outback-nt/106862398
[2] https://www.industry.gov.au/publications/expectations-data-centres-and-ai-infrastructure-developers

PRINCIPLE	DETAIL	OBJECTION
	proportionate to the harm or risk of harm or impact that is being addressed	• We have no assurance that mitigations are appropriate, best practice or proportionate as the industry is not regulated and has no standards, guidelines or National approval requirement.
	19 Precautionary principle (1) If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation. (2) Decision-making should be guided by: (a) a careful evaluation to avoid serious or irreversible damage to the environment wherever practicable; and (b) an assessment of the risk-weighted consequences of various options.	• This use may be facilitating the expansion of artificial intelligence use. The 'Godfather of AI' Geoffrey Hinton says there is 10% to 20% chance AI will lead to human extinction in three decades[3]. This is sufficient reason to stop the proposal while globally and internationally AI remains weakly regulated. • Global heating is known to be approaching serious tipping points and damaging ecosystems, yet this proposal includes avoidable fossil fuel use for power firming [4]and has not demonstrated the end use of the datacentre is needed. • Clearing including clearing for solar panels threaten multiple species yet the proposal has been submitted based largely on desktop studies. • The proponent does not acknowledge the risks to Lake Woods and has not considered cultural values on the site. • The proponent does apply a precautionary approach in regard to the serious risk posed by the 'Lake Effect' (see part 3).
	20 Principle of evidence-based decision-making Decisions should be based on the best available evidence in the circumstances that is relevant and reliable	The application acknowledges the proposal is largely based on desk top information rather than field data[5] (see comments is raised in Part 3) This is highly inappropriate, given the scale and risks involved in the proposal and that the SREBA report it relies on is a 'regional study' not intended for this type of use.

[3] https://www.theguardian.com/technology/2024/dec/27/godfather-of-ai-raises-odds-of-the-technology-wiping-out-humanity-over-next-30-years

[4] https://ntepa.nt.gov.au/__data/assets/pdf_file/0015/1622103/referral-report.pdf - refer page 35- gas firming power is chosen because the location is off grid, and suitable batteries will not be available given the applicant's rushed deadlines – completion by 2028.

[5] https://ntepa.nt.gov.au/__data/assets/pdf_file/0015/1622103/referral-report.pdf (pp 46-47)

PRINCIPLE	DETAIL	OBJECTION
		The application [6] also makes clear that this proposal has been developed without consultation with local Aboriginal people, who alone hold certain knowledge about the location and cultural sites and values. Although the applicant commits to doing this down the track this is too late in the process as key concepts are already locked in. More broadly it appears any public input into concept design and NT guidance on datacentres has been stymied through the use of 'non-disclosure agreements'.
Division 2 Management hierarchies	**26 Environmental decision-making hierarchy** (1) In making decisions in relation to actions that affect the environment, decision-makers, proponents and approval holders must apply the following hierarchy of approaches in order of priority: (a) ensure that actions are designed to avoid adverse impacts on the environment; (b) identify management options to mitigate adverse impacts on the environment to the greatest extent practicable	The use of gas power is based on price and timing considerations does not 'mitigate adverse impacts on the environment to the greatest extent practicable'.
	(2) For subsection (1), waste should be managed in accordance with the following hierarchy of approaches in order of priority: (a) avoidance of the production of waste; (b) minimisation of the production of waste;	The proposal does demonstrate the data services provided: 1. are needed; or 2. measures are in place to minimise the demand for or the environmental consequences of these services.

[6] https://ntepa.nt.gov.au/__data/assets/pdf_file/0014/1622102/referral-form.pdf (p16)

Part 3 - Concerns related to Environmental factors

THEME	FACTOR	OBJECTION
Land	Landforms	• Clearing of native vegetation destroys habitat, damages soils and causes erosion from wind and water runoff.
	Terrestrial ecosystems	• The applicant relies mostly on desktop information rather than fit for purpose field surveys. Other threatened species may be at risk to those identified. • I object to the heightened risk to threatened species including mammals (e.g. the greater bilby - widespread in the area), reptiles (e.g. northern blue-tongued skink, yellow spotted monitor and plains death adder) and multiple bird species. • This area is clearly a stronghold for a species that is facing many threats across its range. The Greater bilbies are already under severe threat from the nearby Muckaty solar precinct proposal, which seeks to clear 1.75% of bilbies' remaining occupied habitat across Australia[7]. This proposal adds to this tragedy. 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 not national populations. • Lake Effect on birds, bats and insects of solar panels is not considered. US data estimated, an average 456 birds die per square kilometre of panels annually[8]. These figures cannot be directly translated to this extraordinary proposal of this scale, however these global averages highlight an immense risk which needs to be treated via a precautionary approach. The impact of Lake Effect should have been considered in this proposal. Species like Grey Falcon could be vulnerable as well as bird species associated with aquatic ecosystems. • Species that are vital to ecosystem function and/or of cultural/sacred importance. 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

[7] https://ntepa.nt.gov.au/__data/assets/pdf_file/0007/1566979/referral-report.pdf (p88)
[8] 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

THEME	FACTOR	OBJECTION
		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.
Water	Hydrological processes	**The risks from groundwater extraction are recognised as warranting more work .** ***However, I am deeply concerned that these risks are underappreciated and cannot be resolved as the Georgina Wiso Water Allocation Plan for the area lacks any environmental protections; does not include 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 *9*: *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 environment* Furthermore the water allocated for general consumptive uses is being rapidly taken up by big industries for no cost. In just the last fortnight the NT issued licences for a further 15 GL/yr in the plan area. This rapid expansion of use is highly significant in the context of the amount of water available for private licensed consumptive uses in the Wiso Groundwater Management zone (16.3GL/yr). The 4GL/yr for this proposal, ***plus unacknowledged additional demand for the future Ammonia plant*** means that groundwater is rapidly being consumed by a small number of very large industries to benefit remote users and do not pay for this groundwater.. The burgeoning demand for groundwater means the water allocation plan needs to be redrafted now with appropriate consideration and protection of environmental and cultural water requirements and community involvement.
	Inland water environmental quality	**Contamination risks to aquifers, waterways and wetlands are not recognised but must be. Failure to recognise these suggests they are not being taken seriously.**

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

THEME	FACTOR	OBJECTION
		A closed loop air condition system proposed. This uses less water than evaporative cooling systems however flushing creates contaminated wastes including refrigerants, concentrated salts, metals, nitrites, biocides and bacteria][10] Given the large volume of water included in the application it appears that some groundwater for evaporative cooling could still be required leading to large volumes of contaminated wastewater. Contaminated leachates reaching groundwater put subterranean groundwater dependent ecosystems, including potentially rare species of stygofauna at risk. Downgradient aquatic ecosystems and the inherent values of the groundwater including potential for drinking are also at risk. *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, including disposal of wastewater, and storage of contaminants associated with industrial uses/airfield. These introduce surface and groundwater contamination risks. *Surface water pollution* 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. Furthermore Lake Woods is a recharge area for the underlying Cambrian Limestone Aquifer[11].
	Aquatic ecosystems	**The applicant does not acknowledge and excludes the serious risks to waterways and the downstream wetlands Lake Woods 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

[10] A.. https://ketos.co/closed-loop-cooling-water-saver-or-chemical-time-bomb
b.. https://www.fwpcoa.org/content.aspx?page_id=5&club_id=859275&item_id=130961
c. . https://www.eenews.net/articles/data-centers-face-a-new-environmental-concern/

[11] https://territorystories.nt.gov.au/10070/900048/0/68 (p32)

THEME	FACTOR	OBJECTION
		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[12] 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 needs to be considered. ***Lake Effect and impacts on birds including 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)[13]. The location may also be directly underneath the flyways for migratory birds covered under international agreements. US data estimated, an average 456 birds die per square kilometre of panels annually[14]. These figures cannot be directly translated to this extraordinary proposal, however these global averages applied to approximately 70 square kilometres of solar panels would predict an annual loss of tens of thousands of birds. This warrants extreme caution and the highest level of rigour through the assessment process,especially given proximity of the site to Longreach waterhole, Lake Woods and probable flyways for migratory birds.
	Groundwater dependent ecosystems	***Subterranean*** Subterranean groundwater dependent ecosystems can also be expected to occur in the limestone aquifer beneath the site and locally. These are vulnerable to both groundwater extraction, soil and water contamination and leachate/overflow from wastewater storage. ***Downstream terrestrial and aquatic 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. Because these are poorly protected by the Georgina Wiso Water Allocation Plan, this proposal puts these at greater risk.

[12] https://territorystories.nt.gov.au/10070/532083
[13] 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.
[14] 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

THEME	FACTOR	OBJECTION
Air	Atmospheric processes	***Greenhouse gas emissions*** I object to the avoidable greenhouse gas emissions for an energy intensive data storage and processing. There is insufficient industry legislation to ensure that energy demands are minimised or necessary (see below on lack of binding rules). I 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 must be avoided.
People	Community and economy	As a community member I am deeply concerned about the rapid rollout of datacentres and failure to regulate both datacentres and artificial intelligence. I doubt this use is in the public interest, especially given the lack regulation and lack of community consultation. In other parts of the World there is mounting opposition to hyperscale datacentres.[15] Given this is a new industry there is a high risk that this project once built (at immense environmental cost) could be abandoned leaving an ongoing environmental liability.
	Culture and heritage	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.* [16] 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.

Thank you for your consideration.

Kind regards,

Adrian Tomlinson
Written with respect on unceded Central Arrernte lands

[15] https://time.com/article/2026/07/22/community-backlash-ai-data-centers/

[16] 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