

Environmental Regulatory Reform

Feedback Summary Paper

Version 0.1

Contents

1	Introduction	1
2	The NT EPA’s Roadmap	1
2.1	Summary of comments	1
3	Topics and themes	2
3.1	Purpose and principles of assessment systems	2
3.1.1	Summary of comments	2
3.2	Defined assessment triggers	3
3.2.1	Summary of comments	3
3.3	Assessment processes commensurate with risk	4
3.3.1	Summary of comments	4
3.4	Quality of information used in decision making processes	5
3.4.1	Summary of comments	5
3.5	Encouraging public participation	6
3.5.1	Summary of comments	6
3.6	Improving environmental outcomes and accountability	7
3.6.1	Summary of comments	7
3.7	Making the best use of our community’s eyes and ears	7
3.7.1	Summary of comments	7
3.8	Introducing review (appeals) processes	8
3.8.1	Summary of comments	8
3.9	Roles and responsibilities	9
3.9.1	Summary of comments	9
3.10	Introducing environmental offsets	9
3.10.1	Summary of comments	9
3.11	Other matters	10
3.11.1	Indigenous environmental knowledge	10
3.11.2	The reform process	10
4	Where to from here	10
Appendix 1	List of Submissions	11

1 Introduction

In May 2017, the Department of Environment and Natural Resources released the *Environmental Regulatory Reform Discussion Paper*. The paper discussed potential improvements to the Territory's environmental impact assessment and approval processes. It was the first step in delivering Government's environmental regulatory reform commitments as contained in the *Healthy Environment, Strong Economy* policy.

The paper was open for comment for six weeks, with comments closing on 14 June 2017. The period for comment was subsequently extended until 28 June 2017. 28 submissions were received during the comment period. A list of submissions is at Appendix 1.

This paper provides an overview and summary of the feedback received in response to the Discussion Paper. It includes information provided in written submissions as well as during face-to-face consultations with stakeholders. It should be read in conjunction with the discussion paper and the written submissions.

We thank all of those groups and individuals that took the time to meet with the project team or made a written submission. Submissions, except those that we were asked to keep confidential, are available from <https://denr.nt.gov.au/environment-information/environmental-regulatory-reform-program>.



2 The NT EPA's Roadmap

In late January 2017 the Northern Territory Environment Protection Authority (NT EPA) released its *Roadmap for a Modern Environmental Regulatory Framework for the Northern Territory* (Roadmap).

The Roadmap identifies the NT EPA's suggestions for reforms to the assessment and approvals system, and includes some information about other reforms (such as those associated with removing duplication in environmental regulation). Under the relevant legislation, the Minister for Environment and Natural Resources must provide the NT EPA with a formal response to the Roadmap. This response will identify how the Government intends to implement the NT EPA's recommendations. If the Government does not intend to implement any of the recommendations, it will provide its reasons.

We asked stakeholders to provide any comments they had on the Roadmap to inform the response by the Minister.

2.1.1 Summary of comments

Stakeholders who made comment on this element of the Discussion Paper supported the intent of the proposals and recognised that the Discussion Paper largely supported the Roadmap's recommendations but with greater focus on transparency and accountability. Some stakeholders considered the Roadmap provided evidence that there is an appetite for environmental reform.

One stakeholder was critical of the Discussion Paper when comparing it to the Roadmap, stating that the Discussion Paper lacked detail and therefore undermined the value of the work contained within the Roadmap. Conversely, another stakeholder expressed concern that the Discussion Paper indicated that elements of NT EPA's Roadmap would be implemented and viewed this as inconsistent with purpose of Discussion Paper and consultation process.

The Minister for Environment and Natural Resources will now seek to finalise her response to the NT EPA about the Roadmap.

3 Topics and themes

In this section of the Discussion Paper we outlined what stakeholders had previously told us, and identified potential responses to address concerns and suggestions.

3.1 Purpose and principles of assessment systems

We identified that our environmental impact assessment system is intended to improve environmental outcomes for the Territory by ensuring that the environmental risks of projects are properly assessed and considered in the decision making process.

We outlined that our guiding principles of certainty, efficiency, outcomes and risks focus, responsiveness, accountability and public participation would guide this process.

In addition we will work to ensure that our new assessment and approval process recognises and rewards proponents that have a history of reliability and high performance.

3.1.1 Summary of comments

Overall there was support for the guiding principles outlined in the Discussion Paper. Some respondents sought to clarify the intent of the principles by suggesting some re-wording while others suggested additional principles. Examples of the re-wording included:

- certainty – the system rules are robust, clear, transparent and consistently applied
- efficiency – the system is cost effective, timely and streamlined, minimising regulatory burden
- accountability – Decision makers (not players) are transparent and accountable for their decisions and actions
- responsive – responsive and flexible, where appropriate.

Additional principles put forward include:

- clear objectives and transparent oversight
- underpinned by sound science and evidence
- appropriate to the nature and scale of the project
- transparent processes supported by guidance on regulator expectations.

A number of respondents made reference to the importance of Ecologically Sustainable Development (ESD) principles being drawn upon to guide both the reform process as well as a future impact assessment process. One respondent referred to ESD to argue that a system that is ‘outcome and risk focussed’ should include cultural and social outcomes as well as environmental outcomes. However, another respondent, while agreeing that the impact assessment process should be based upon the principles of ESD, stated that the definitions of ‘environment’ and ‘sustainable development’ needed to reflect the intention of the system and the role of decision makers.

Some respondents referenced, and suggested consistency with, principles of environmental justice as set out by the Australian Panel of Experts on Environmental Law. These include principles of environmental restoration, non-regression, achieving high level environment protection and applying best available techniques.

Most respondents recognised the need for the regulatory reform work, stating that the current system had lost community trust and provided little certainty for industry. Some respondents provided input on their expectations of an environmental impact assessment process. This included putting in place a process supported by clarity, delineation of roles and responsibilities and clear timeframes; which ensured the engagement of Aboriginal people, recognising and protecting Aboriginal values and the application of Aboriginal knowledge; and, whose purpose was to ensure development avoided significant adverse impacts (direct and indirect as well as immediate and long-term). The need for a system that provided flexibility and promoted innovation was also identified, as well as one which allowed for strategic environmental assessment and the assessment of cumulative impacts.

3.2 Defined assessment triggers

There is a recognised need to improve information for project proponents, the community and decision makers about what types of projects (or activities) require environmental impact assessment. This is often referred to as the need for ‘assessment triggers’.

We suggested the introduction of two types of triggers.

Firstly, we suggested the introduction of Territory Environmental Objectives (TEOs) which would be specified by the Minister for Environment and Natural Resources. These would be outcome based triggers which would allow the potential risks and environmental impacts of projects to be considered. The need for environmental impact assessment would be determined by the nature of risks and impacts and how ‘significant’ those risks or impacts were. This is similar to the approach adopted in Western Australia.

Secondly, we suggested what we referred to as ‘hard triggers’. These would be specific types of projects, or projects in specific locations, that the Minister decided would always need to undergo impact assessment. This is similar to the approach taken in Tasmania and New South Wales.



3.2.1 Summary of comments

Generally, respondents were supportive of the introduction of TEOs, recognising that they could assist in streamlining the environmental impact assessment process as well as removing discretion from decision making. There was also suggestion that TEOs could be used outside of the environmental impact assessment process, within other decision and/ or policy making frameworks (providing integration with other legislation and processes).

One respondent did not support the use of TEOs arguing that their use would not provide a consistent basis for determining the significance of impacts nor provide a definition of significant impact. The need to define ‘significance’ or ‘significant impact’ was recognised by a number of respondents suggesting this be coupled with the use of TEOs to ensure that the environmental impact assessment process only focussed on projects with the potential for significant impact.

One respondent cautioned that environmental objectives that are supported by prescriptive guidance material have potential to be reductionist and recommended that the regulatory regime build in safety mechanisms to ensure the use of objectives is not overly prescriptive. Contrary to this position, comments were made by other respondents who expressed concern about TEOs being ‘high level’ so that they would act as a catch all. It was generally recognised that the use of TEOs would need to be supported by clear public guidance on their use and how significance was to be judged.

Most respondents stated that further public consultation and engagement about the TEOs was necessary.

There was a mixed response to the use of hard triggers. Some respondents supported them, however many viewed industry-specific triggers, in particular, as having the risk of bringing a project into the environmental impact assessment process that may not have significant impact on the environment. Many respondents argued that triggers for environmental impact assessment needed to be based on risk and an assessment against outcomes, although other respondents saw a place for hard triggers that were based upon either industry type and/ or location and that hard triggers could reduce decision maker discretion and encourage compliance.

3.3 Assessment processes commensurate with risk

The Territory's current impact assessment system identifies three assessment approaches:

1. Public environment report (PER).
2. Environmental impact statement (EIS).
3. Public inquiry.

There is also a modified PER (bilateral agreement) process which can be used by the NT EPA to assess projects on behalf of the Australian Government in accordance with a Bilateral Agreement established under section 45 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

We suggested changes to these approaches to align them more commensurately with a project's potential risks and impacts.

Suggestions were:

- **Assessment through Supplementary Information:** This process would allow a project to be assessed based upon the referral information, and, if necessary, additional information ('a supplement').
- **Environmental Impact Statement:** This level of assessment would be triggered by larger, major projects. It would follow a similar process to the existing EIS process.

We identified that proponents would be able to streamline this process by electing to undertake an EIS.

- **Public Inquiry:** This process could be used to examine a project as a whole or to examine specific elements of a project (while the remainder of the project is being reviewed under a different level of assessment).

That the new process should enable assessments to be undertaken on a project basis or more strategically was also suggested.

3.3.1 Summary of comments

Respondents supported tiers of assessment, recognising that a range of assessment pathways will improve risk management and increase regulatory efficiency for business and industry. Respondents communicated the importance of assessment scaling being based on risk of potential impact on the environment (rather than industry specific).

Self-assessment by proponents was supported however it was stated that guidance will be required to under-pin the success of this process. Coupled with this is the need to recognise a proponent's right to decide not to submit when there are no potentially significant impacts.

There was a lot of support for the introduction of strategic environmental assessment with a limited number of respondents arguing that this should not replace the need for project based environmental impact assessment, if required.

Respondents linked strategic environmental assessment with land use planning (zoning decisions), bioregional assessment as well as strategic industry assessment.

There was strong argument by one respondent against the inclusion of a provision that would allow the NT EPA to recommend to the Minister for Environment and Natural Resources that an application be refused at the point of a referral. This was based on an argument of procedural fairness, that is, all projects should be subject to a transparent and rigorous environmental impact assessment process. However, other respondents supported the inclusion of a refusal at the point of a referral as improving certainty.

3.4 Quality of information used in decision making processes

In the Discussion Paper, we highlighted a number of concerns reported by stakeholders about the quality of information available to support environmental management decision making. These included concerns about the availability of appropriate data, the type of information and data that should be considered in the decision making process, and the transparency of data and information.

We identified that the proposed approach of specifying TEOs could be used to focus data collection and information in the assessment process onto those risks and impacts of most significance. We also proposed giving the NT EPA the power to undertake a review of the adequacy of information presented in assessment documentation before it is published.

Requiring proponents to prepare 'plain English' summaries of assessment documents and other initiatives to improve the accessibility of information was raised as part of our discussion of ways to improve public participation in the assessment and processes.

We sought ideas on other initiatives that could be introduced to improve the quality of information used in the assessment and approval processes.



3.4.1 Summary of comments

Respondents recognised the need for the environmental impact assessment process to be supported by an adequate level of information that is proportionate and commensurate to the proposed works and environmental impact. Some argued that a project should not be assessed (and approval not given) until the information is provided. There was general support for a form of adequacy review to be undertaken by the NT EPA, although at least one respondent argued against it, due to time and cost implications.

There was some argument about an environmental impact assessment being supported by baseline data. A number of respondents argued that baseline information may not be available at the time of submitting environmental impact documents (a referral or other assessment document) and this needed to be recognised as acceptable in some situations, and addressed through approval conditions. Others argued strongly against this stating that an assessment based upon information collection post-approval should not be accepted. Again, many respondents recommended public guidance to ensure the NT EPA's expectations for information provision are understood.

Other suggestions by respondents included:

- All environmental impact assessment documentation for a project could be online with email alerts provided to interested stakeholders.
- Aboriginal rights, interests and views in environmental matters needs to be incorporated into environmental impact assessment documents.
- The use of an independent peer review, drawing on a consultancy pool.
- The public disclosure of the environmental history of the proponent.
- The pooling of baseline information and having it available publicly (also drawing from previous assessments).
- Assessment authorities being empowered to access expertise.
- Certification of consultants and penalties for insufficient or misleading information.

3.5 Encouraging public participation

The involvement of stakeholders and the public in the assessment and approval process is critical to good decision making and building trust in the system.

We proposed to increase the opportunities for public participation in the assessment process by publishing assessment documentation, including referral information and supplementary information, for public comment. Comments were sought on whether other documentation, such as draft environmental assessment reports prepared by the NT EPA, should also be made available for comment. We also asked stakeholders about when in the process proponents should engage with potentially impacted communities and how we could ensure meaningful public engagement.

Statements of reasons that would be provided for all decisions were identified, and that these would be made publically available.

We said proponents should prepare 'plain English' summaries of assessment documents and where relevant translate these into local language to improve the accessibility of information.

Concerns that had been raised about the timeframes imposed by the system for public comment were noted, while recognising that timeframes are necessary to provide investment certainty.

We identified that suitable review (appeal) mechanisms would assist to build confidence in the system. This is discussed further below.

3.5.1 Summary of comments

While all respondents recognised a proponent's obligation to consult with its community (engaging in constructive dialogue to inform, listen and resolve issues around their project) there was a difference of opinion on how this should be done. Some respondents expressed concern about timeframes being impacted by increased engagement requirements, arguing that additional public review periods will add time and complexity to the process. It was argued that the focus needed to be about developing better consultation through the process rather than just more consultation periods. On a similar vein, another respondent suggested that different stages of the process demanded engagement while others could rely on information provision.

There were differing opinions on the inclusion of consultation and engagement reports and plans in referral or environmental impact assessment documents. Some thought the requirement should be legislated and be subject to a merit review while others argued that upfront community consultation should depend on nature, scale and risk of activity, and should not just be a blanket approach.

Some respondents argued that timeframes for engagement should not be absorbed by the existing process, instead they needed to become additional to the process and they needed to be flexible, reflecting the cultural and language requirements of affected stakeholders. Providing documentation in language or plain English was promoted by some, as well as the ability to input and provide comment on environmental impact assessment documents orally. Publishing documents in local language was presented by another stakeholder as challenging, suggesting face-to-face engagement as the best means to communicate on a project.

Not unexpectedly, there were differing viewpoints on the availability of a draft assessment report to just a proponent versus to the proponent and the public. Some argued that better upfront engagement and public participation negated the need to make the draft assessment report a public document, others argued that if a draft assessment report is to be available to a proponent then it needed to be available publicly. There was concern that having a draft assessment report publicly available provided opportunity for delaying a project.



3.6 Improving environmental outcomes and accountability

We noted that many aspects of our existing assessment system are discretionary, and that the integration between the assessment process for a project and the subsequent approval process is not always clear. Stakeholder concerns about governance, transparency and accountability were noted.

We suggested that the TEOs and 'hard triggers', in combination with published statements of reasons, would assist proponents, community and government to understand the NT EPA's assessment decisions.

Government's commitment to introduce an environmental approval issued by the Minister for Environment and Natural Resources following the assessment process was identified as providing greater clarity and integration between the assessment and approval processes.

3.6.1 Summary of comments

There was strong support for public guidance information being available to support a future environmental impact assessment process, outlining how decisions are to be made and guiding both proponents and the NT EPA in how they are to interact with the environmental impact assessment process. There was also strong support for the release of formal documents (such as a statement of reasons) that would provide public account for a decision that the NT EPA has made within the impact assessment process.

Overall the introduction of an environmental approval was supported, however some respondents questioned (and cautioned against) duplication with approval requirements in other pieces of legislation, arguing that clear delineation is required. Some respondents expressed concern about the industry-specific expertise required to issue an approval. Others argued that an environmental approval will provide a clear line of accountability, remove current conflict of a government agency responsible for attracting and advocating for an industry type also having the approval role for that industry, and provide a simpler arrangement for environmental assessment.

Respondents who provided comment on the introduction of offence provisions were largely supportive, recognising these were an important element of an overarching environmental governance model. However there was some apprehension about potential powers provided to the NT EPA and a suggestion that offence and enforcement provisions be supported with clear public guidance.

3.7 Making the best use of our community's eyes and ears

Concerns have been raised about Government's capacity to regulate development in the NT given its large land mass and relatively small population. We identified that there were a number of measures we could introduce to provide the public with the opportunity to advise the NT EPA about developments occurring in regional and remote areas. These ranged from administrative measures where the NT EPA encourages the public to report developments, to legislative measures such as powers for the public to formally refer a project to the NT EPA for consideration under the assessment process.

In addition to reporting and referral options, we identified that the legislation could include provisions supporting the public to seek injunctions where development has not been approved or is not consistent with the conditions of the approval.

3.7.1 Summary of comments

There was a mix of views about introducing public referral and injunction provisions. Some respondents communicated concern about a broad net being cast allowing the general public to refer a project to the NT EPA or to seek an injunction to stop work on a development, arguing that it opened up the system to vexatious action by people ideologically opposed to a development type, impacting timeframes and costs for a proponent. Other respondents argued support for the broad approach stating that mechanisms can be built into the process to stop it being exploited or used incorrectly. Most respondents agreed to a mix of land councils, government agencies, and affected stakeholders being able to make a referral or seek an injunction coupled with members of the public being able to notify the NT EPA about a project who would

then be required to provide an informal response on the issue.

Many respondents made comment on the NT EPA's ability to respond to third party referrals or injunctions due to limited resourcing as well as the need to ensure that there was robust public guidance on process to support the provisions, if they were to be introduced.

A number of respondents also recognised that the requirement for third party referrals or injunctions would be reduced if the impact assessment process was supported by effective up-front community engagement and participation in the project development phase as well as during the assessment process. This provided argument for ensuring that the front-end of the impact assessment process received focus and was administered effectively.

3.8 Introducing review (appeals) processes

We identified that suitable review (appeal) mechanisms would assist to build confidence in the system and sought feedback on who should be able to appeal, the types of decisions that should be subject to appeal, and who (the court or the NT Civil and Administrative Tribunal; NTCAT) should hear an appeal.

We suggested that the following groups should be allowed to appeal a decision:

- Proponents (or applicants).
- A person who is, or is potentially, directly affected by the decision, such as a neighbouring land owner whose property is traversed to access a project site, or a downstream land owner who uses water that may be impacted by a project.
- Members of an organised environmental, community or industry organisation (such as the Environment Centre of the Northern Territory or the NT Cattleman's Association).
- Land councils and local government bodies.
- A person who made a legitimate submission during the assessment or approval process. This would include for example a community group or individual who made a submission in response to referral information or a draft environmental impact statement.

3.8.1 Summary of comments

There was a mix of opinion on the introduction of appeal rights. One respondent argued for the introduction of appeal rights by stating that a transparent and defensible process must contain the opportunity for a right to appeal. Other respondents were very hesitant in their support due to concern that the process could be abused with the intent of adding time and cost to a project. While some respondents claimed there was evidence elsewhere where third party appeal rights had been abused by vexatious complainants, other respondents provided evidence that this had not occurred and argued that there were existing mechanisms in law to stop this from happening.

A number of respondents argued that third-party appeal rights undermined the role of the NT EPA, questioning the purpose of having an independent body of experts overseeing the impact assessment of projects if their decisions and recommendations are then subject to third-party appeal rights. Other respondents outlined their view on what decisions should be open to appeal and the types of appeal that should be available (for example, approvals to be open to judicial review and assessment and monitoring decisions open to both judicial or merits review). Respondents that supported or accepted the inclusion of appeal rights tended to agree with judicial appeal being heard by the courts and merits-based appeal heard by NT CAT. A couple of respondents recommended the WA Appeal Convenor model and one respondent referred to the Victoria system that allows the public and experts to challenge validity of information, arguing this would overcome need for review of statements and recommendations within the assessment report.

Similar to the comments made on third party referrals and injunctions, there was recognition that an effective and well-administered impact assessment process should reduce the need for third-party appeals to be used; i.e. an inclusive, open, transparent and trusted assessment and approvals process would be less likely to be subject to frivolous and vexatious applications. Some respondents identified existing court rules and processes available to ensure vexatious claims are minimised, such as those allowing courts to identify and prevent vexatious litigation, to strike out frivolous or vexatious pleadings and to declare people as vexatious litigants.

Other respondents provided suggestions on how vexatious appeals could be managed and minimised; e.g. by implementing strong requirements for justification and with short timeframes for resolution.

There was also a mix of views on who could apply for an appeal (if at all) with many arguing that a proponent should have the right of review and if third-party appeals were to be introduced then this should be limited to affected stakeholders only.

3.9 Roles and responsibilities

We discussed that many of our stakeholders had identified that the roles of the NT EPA, various government departments and Ministers in the environmental management system was unclear. This lack of clarity impacts confidence and trust in the system.

The existing responsibilities of the NT EPA in environmental impact assessment, the regulation of wastes and pollution, and providing advice to Government on environmental issues were outlined. We sought feedback about what our stakeholders considered the role of the NT EPA should be in the environmental management framework.

3.9.1 Summary of comments

Respondents largely held two opinions, with about half of the respondents arguing that the NT EPA should retain its current roles, that is, impact assessment, environmental regulator as well as strategic advice to Government (with one respondent arguing for the NT EPA to be a stand-alone agency) and the other half of respondents arguing for the NT EPA to retain its role as assessor and strategic advisor; however, stating that the regulatory function sat better within a government agency.

Most respondents argued that no matter the roles and responsibilities established to support the environmental reforms, appropriate resourcing was required for all functions to be exercised effectively. Similarly, there was argument for the appropriate enforcement powers to be put in place to support the intent of the regulatory reforms.

Some respondents provided suggestions on further changes to the NT EPA functions and operating governance structure, such as taking on a concurrence role for zoning decisions or certain significant developments where there is likely to be a significant environmental impact. Recommendations regarding the operating governance structure of the NT EPA focused on ensuring inclusivity of Aboriginal advice and input into impact assessment process, for example, establishing an Indigenous Advisory Committee as well as including Aboriginal representation on the NT EPA board.

3.10 Introducing environmental offsets

Offsets are measures that compensate for the residual adverse impact of an action on the environment at one site by undertaking activities at another site. They are universally recognised as part of a mitigation hierarchy in which offsets are applied as a last resort, after all reasonable steps to avoid and mitigate the environmental impacts of a project have been exhausted.

We noted that our new system would support the 'avoid, mitigate, offset' hierarchy which would enable the Territory to introduce requirements for offsets as part of the project approval process in the future. We advised that further consultation on the introduction of offsets would be undertaken.

3.10.1 Summary of comments

There was some cautiousness expressed about the introduction of offsets noting that while these are a well-recognised part of the mitigation hierarchy recent reviews have identified some problems with an offsetting regime and identified challenges and opportunities to improve offsetting. As a consequence, many respondents argued a need for further consideration and consultation before an offsets regime is introduced.

Where offsets received support there was also an understanding that they needed to be a measure of last resort and supported by effective regulation, monitoring and enforcement.

3.11 Other matters

While our paper specifically addressed the environmental impact assessment process, we welcomed comments about any part of the environmental management system.

3.11.1 Aboriginal environmental knowledge

Respondents who commented on this element of the reforms supported the incorporation of Aboriginal environmental knowledge into the impact assessment process, with one respondent arguing that the investigation on the incorporation of Aboriginal environmental knowledge into the impact assessment process should be priority for the NT EPA.

As one respondent identified, Aboriginal people hold intergenerational knowledge directly applicable to a development site, encompassing long timeframes. There needs to be great improvements in engagement policy and practice and the resources devoted to it in order to access and apply this knowledge.

Another respondent identified that the process should make use of Aboriginal experience of changes in the environment and that adaptive management strategies should incorporate Aboriginal perceptions of environmental change. This respondent also noted that by using Aboriginal knowledge it would be possible to build capacity in communities to take an empowered role in monitoring and compliance procedures.

3.11.2 The reform process

In general, all respondents saw value in an ongoing dialogue about the environmental reforms and sought further consultation on some elements of the reforms (such as the TEOs and offsets).

4 Where to from here

We will be continuing our conversations with key stakeholder groups as we prepare advice to Government on the Territory's new environmental impact assessment and approval legislation. Once Government has identified its policy position on a particular topic we will provide information about this decision to our key stakeholder groups.

We anticipate that draft legislation will be released for public comment in 2018.

Updates on our progress will continue to be provided via our website <https://denr.nt.gov.au/environment-information/environmental-policy-and-reform/environmental-regulatory-reform-program>



Appendix 1 – List of Submissions

No.	Submission by
1.	Name withheld
2.	Dr Freeland
3.	Local Government Association of the Northern Territory – LGANT
4.	Name and submission withheld
5.	Association of Mining and Exploration Companies – AMEC
6.	Environment Institute of Australia and New Zealand – EIANZ
7.	Top End Native Plant Society – TENPS
8.	Name and submission withheld
9.	Name and submission withheld
10.	NT Seafood Council
11.	Name and submission withheld
12.	North Australia Indigenous Land and Sea Management Alliance – NAILSMA
13.	Arid Lands Environment Centre – ALEC
14.	Name and submission withheld
15.	Name and submission withheld
16.	Lock the Gate Alliance NT
17.	Australian Petroleum Production and Exploration Association Ltd – APPEA
18.	Environment Centre of the Northern Territory – ECNT
19.	Northern Territory Planning Commission
20.	Name and submission withheld
21.	Joint submission Northern Land Council (NLC) and Central Land Council (CLC)
22.	Minerals Council of Australia – NT Division (submission withheld)
23.	Name and submission withheld
24.	Power and Water Corporation
25.	Environmental Defenders Office NT Inc (EDO NT)
26.	Name and submission withheld
27.	Name and submission withheld
28.	Land Development Corporation

