

28th March 2016



Environment
Institute of
Australia and
New Zealand

By email:

balancedenvironmentstrategy.dcm@nt.gov.au

Dear Sir/Madam,

Re: comment on the Northern Territory Balanced Environment Strategy Discussion Draft

The Environment Institute of Australia and New Zealand (EIANZ) Northern Territory Division welcomes the opportunity to submit its comments on the *Discussion Draft of the Balanced Environment Strategy*. We acknowledge the efforts made by the Northern Territory Government (NTG) in developing the Framing the Future strategies as it develops a framework for contemporary and enduring policy. We applaud the NTG that of the four strategic goals of *Framing the Future* (Prosperous Economy, Strong Society, Balanced Environment and Confident Culture) one is environment. To us, and the broader community, this shows the significance of the issue to the government and the understanding that it is a critical issue for the community.

The EIANZ represents environmental practitioners across Australia and New Zealand. EIANZ members work with environmental policy development and implementation across the environmental sector including consultancy, government and mining. Members of EIANZ may also attain accreditation as 'Certified Environmental Professionals' (CEnvP). The purpose of the accreditation scheme is to ensure that clients can access competent ethical advice from bona fide experts.

We see the *Balanced Environment Strategy* as a high level document outlining the NTG's broad policy. As a corollary we assume that the detail around implementation of actions outlined within the document will come later including specific and measurable targets. This response is aimed at this initial high level document and we look forward to working with the NTG to developing the detail of implementation.

Firstly, we endorse the Chief Ministers message (page 2), Territorians do have a have a strong cultural identity, they do recognise the importance of the environment and consequently NT's development must be sustainable and not at the expense of our natural environment, heritage and lifestyle. In contrast, however, we note that of the four strategic goals of Framing the Future only the environment is balanced. This is contrary to the principles of sustainability where environment, social and economic are balanced together. Indeed, prosperity and liveable society are dependent on environment.

Secondly, the document is almost silent on the environmental impacts from climate change (except for an aim under the section Liveable Cities and Towns). We would expect that climate change would be included in all four strategic goals of Framing the Future and the dual financial and environmental benefits of carbon farming further developed in this strategy.



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Thirdly, we note that some actions require a replacement of programs recently defunded or are existing programs with little transparency. Specifically, one of the community's stated roles are (page 13) to hold industry and government accountable for good environmental practice. This has historically been the role of the Environment Centre NT which has been defunded by this government and by the federal government. That along with the defunding of the Environmental Defenders Office has dramatically reduced the community's capacity for this. Similarly, groups such as catchment advisory groups (e.g. DRMAC) and the NT Catchments Advisory Committee are either disbanded or not publically reporting their considerations, and it may be an action to add to the strategy is to ensure existing groups reporting in a structured way to the community.

Fourthly, we don't believe that the section *Why Our Environment Matters* (page 7) of the strategy is well considered. This section does talk of enviable lifestyle and traditional knowledge and diverse ecosystems, which is all true, but makes only passing reference to those environmental aspects that are critical to, for instance, sustainable pastoralism and fisheries. Having a strategy that does not consider these ecosystem services upfront has really missed that critical link between the environment and economy which should underpin the strategy (we acknowledge that ecosystem services are mentioned within the Resilient Ecosystem goals).

Examples of issues we would like to see considered for future iterations of this document include:

- Within Contemporary Management Practices (page 18) we believe that the aim to 'encourage industry to remediate and rehabilitate' should be reworded to 'obligate industry to remediate and rehabilitate'.
- We believe that another critical action is to reward those industries or companies showing good environmental practice.
- Within Healthy Water, Catchments and Waterways (page 15) we find the action to pursue flood and storm mitigation options peculiar in this document. Yes flooding is a critical issue for communities but is also a critical part of the flow regime to maintain healthy rivers, we think that this would be better worded to capture the conflict between flood mitigation and river ecology with an action of ensuring that future development does not occur on floodplains.

We do find that the hierarchy of goals, aims and actions present a clear lineage between objectives and actions but note that the actions are still quite high level and there is substantial work to further link the aims and actions and how they will be delivered. The document, being high level, does not present expected dates or performance indicators thus they are statements of intent. We look forward to working with government to put some meat on these high level bones. There is also some disconnect between aims and actions. For instance in Resilient Ecosystems (page 16) the aim of monitoring does not have an associated action.

Overall we believe that this is an important document that lays a solid foundation for ongoing policy reform. We look forward to working with you in further developing this strategy.

Yours Sincerely,



Jeff Richardson
President, Northern Territory Division
Environment Institute of Australia and New Zealand