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To: [LA Committees](#)
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Subject: Submission for Territory Coordinator Bill 2025 inquiry
Date: Wednesday, 19 February 2025 4:56:03 PM

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I am providing feedback as a young community member of Palmerston.

I see value in the ability of the Office of the Territory Coordinator to streamline developments. However, in its current form it creates too much unnecessary power and undermines laws which were made for good reason.

General Feedback

- There is too much open to discretion in the bill
 - The grounds for the exemption notice could be interpreted in a way that allows use of the exemption notice frequently, and for many projects that would otherwise not go ahead because they would be considered too damaging under other acts.
 - There should be less open to discretion in how the primary principle prevails over other criteria where Clause 8(2) states "to the extent of any inconsistency with the considerations mentioned in subsection (1), those considerations prevail".
 - I think many of the criteria in, for example, environmental and health laws could be considered 'inconsistent' with the "the primary objective of driving economic prosperity for the Territory", meaning that Clause 8, subsection 2 could render other laws useless.
 - Perhaps there should be more specification on what "inconsistency" entails, or the idea of the primary principle "prevailing" over other criteria should be removed completely.
- The Territory Coordinator and Minister might not have the same experience, knowledge, and qualifications as original entities when stepping in under a step-in notice, despite having access to all the resources and advice as the original entity.
- My reaction is very positive to Clause 88, where requests, step-in and exemption notices and conditional variation notices must be made public.

List of specific improvements

- Put Clause 14 (Limitation on exercise of Powers) which was in the Exposure Draft Bill, back into the bill.

- Include the Heritage Act 2011 as one of the acts which cannot be interfered with in Clause 14 (the limitation on exercise of powers)
- In the exposure draft bill, Clause 14 subsection 1 mentioned only the Territory Coordinator in the limitation on exercise of powers. This should also apply to the Minister.
- I believe it would be best if the step-in notices and exemption notices were removed entirely.
 - Maybe the goal of these could be achieved by amendments to old laws instead.
 - If they cannot be removed, then I believe exemption notices should only apply for segments of acts. (Because the reasons given for exemptions suggest the whole act would never need to be modified or excluded from applying).
- There should be something in the bill which ensures the notices are used "infrequently" as "intended" by the government, as the guide to the draft bill describes.
- Remove the *Radioactive Ores and Concentrates (Packaging and Transport) Act 1980* and the *Radiation Protection Act 2004* from the scheduled laws, and keep the *Nuclear Transport, Storage, and Disposal (Prohibition) Act 2004* out of the scheduled laws.
- Create more scrutiny by independent bodies around actions of the Territory Coordinator and Minister.

Overall Impression

- I am concerned the bill could bring future reforms which lead to worse effects than this bill may lead to, because the exemption of law and dismissive attitude towards the other acts could degrade the principles these laws support.
- I am not an economist, but I believe I still can understand that much benefit could come from making large projects happen faster.
- However, I think this could be done without the risks of negative effects which the current form of the bill holds.

I am not familiar with legal terms, so I apologise if any of my terminology is incorrect.

I am also aware that because I am not an expert, some of the issues I have raised, as well as my conclusions about the bill, might be incorrect. However, I thought it would still be beneficial to submit my opinion and the possible issues I see with the bill, to help add to the amount of material the Inquiry can work with.

- Isak.