

Dear Dr. Paul Vogel and the Board of the NT Environment Protection Agency,

Thank you for taking the time to read this submission regarding my deep concerns with the Singleton Horticulture Project, and for considering the importance of protecting fragile and deeply valued arid landscapes through a Tier 3 Assessment (assessment by EIS) of the Project.

I live in Mpartnwe, on the unceded lands of the Arrernte peoples. I work and travel across the beautiful arid lands of the Kaytyetye people. This land of ghost gums, sacred swamps and soakages, refugia for native birds, animals and dreaming tracks has been cared for by Kaytyetye people for millennia. I am deeply concerned that a very large part of this sensitive and deeply valued land is now at risk of significant and irreversible damage due to the Singleton Horticulture Proposal.

I am seriously concerned about this Proposal, which I believe requires a Tier 3 Economic Impact Assessment as a matter of urgency. Its sheer scale alone, as the largest groundwater licence issued in the NT and likely Australia should immediately require full Economic Impact assessment. This scale is unprecedented, and its impacts therefore extremely unknown and potentially dire, and irreversible. If it goes ahead, it will have major consequences on the environment and people, and due to the unacceptable level of uncertainty surrounding these impacts, they will likely be far worse than predicted. But the fact is we just don't know enough. Fortune's referral documents and license demonstrate uncertainty about fundamental issues to this project: location and impacts on groundwater dependent ecosystems, on sacred sites and cultural values, on salinity levels, on climate change considerations, on threatened species, among others. A Tier 3 economic impact assessment will allow for the consideration a project of this scale requires, and to fill many gaps that remain unanswered.

These uncertainties give rise to unacceptable risks. I just cannot understand how Fortune Agribusiness rated their residual risk levels as low and medium. Given the massive potential for impacts and the sensitivity and value of this landscape and groundwater, this project must logically be considered HIGH risk and assessed accordingly.

I am concerned that this Proposal threatens the EP Act's objectives to protect the environment, recognise Aboriginal rights and interests and the importance of Aboriginal people in environmental decision making processes.

I urge the NT EPA to consider my concerns, and the concerns of Traditional Owners and organisations such as CLC, ALEC and the EDO. To reiterate, my concerns, which speak directly to the criteria the NT EPA must consider in assessing this proposal, are:

1. This Project is likely to have significant impacts on the environment and people, in scale, irreversibility and intensity
 - a. Many groundwater dependent ecosystems (GDEs) will die or be irreversibly damaged with water drawdown across 40kms of fragile country. Indeed the Guideline which allows for the destruction of up to 30% of GDEs was made behind closed doors (not open to public consultation) and is an acceptable environmental risk.
 - b. These GDEs are not just important sources of biodiversity to threatened species; many are culturally critical to Kaytetye people. Susan Donaldson's cultural values assessment report commissioned by the CLC found 40 sacred sites within the drawdown area. The AAPA Certificate issued to Fortune will not protect these sites. It covers only a small area of the drawdown zone, and in the area it does cover it misses 5 sacred sites. This puts these sites at unacceptable risk, and places Fortune at risk of contravening the Sacred Sites Act.
 - c. Donaldson's report also made the intensity and scale of the likely impacts on sacred sites from water drawdown abundantly clear: the trauma of their destruction will cause untold emotional and psychological harm.
 - d. These aquifers are also home to stygofauna, which are likely to experience local extinction with drawdown.

2. There are simply too many knowledge gaps in the proposal, which completely undermines any confidence I have in the proponent to accurately predict the extent and likelihood of these impacts. As such, they could be far worse than is currently predicted.
 - a. There are substantial unknowns around the impacts of extracting 40,000 ML/year of groundwater: the sustainable yield, the recharge patterns, salinity levels and aquifer storage cannot be accurately estimated or modelled until water extraction begins, which means the project needs to be extremely precautionary.
 - b. Baseline data of hydrogeological, flora and fauna studies are insufficient and lacking. The Biodiversity Assessment, which Fortune relies on, is based on surveys conducted during prolonged drought and had no sites in the proposed land clearing area. This makes its findings highly questionable.
3. These same gaps in knowledge of the potential impacts also undermines any confidence one could have in the effectiveness of any mitigation measures. How can we trust that the proponent will be able to actually avoid damage when they haven't properly assessed what is there?
4. There has not been enough community engagement on this Proposal. I was not aware of any engagement by the proponent, my knowledge of this proposal is based on my own research and involvement with environmental organisations.
5. As far as I know, there has been minimal adequate consultation with Traditional Owners who will be affected by this proposal, and bear the brunt of its costs to country and culture.
6. The purported benefits (local jobs, local spending) of the Project will not outweigh these significant costs. The purported economic benefits were shown to be overestimated and overinflated by the economic review conducted by Uni SA.
7. The social license of this project is severely lacking. There has been significant opposition to the project.

I am deeply concerned about the precedent this Proposal sets for protecting the environment and people into the future. There have been too many decisions made behind closed doors (such as the Guideline that allows for 30% destruction of GDEs, and many Adaptive management measures which push the plan to opaque post-approval processes) and this is the critical opportunity to open the doors to public scrutiny and rebuild trust.

Thank you again for taking the time to read this submission.

Kind regards