

Adrian Tomlinson
Alice Springs NT 0870
Email:
adrianjtomlinson@gmail.com

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Senator the Hon Murray Watt
PO Box 6100 Senate
Parliament House
Canberra ACT 2600
Email: senator.watt@aph.gov.au

Dear Murray

Sweetwater Agricultural Development Stage 1

I am writing to object to the above proposal on Spirit Hills Station on the Keep River east of Kununurra, which is proposed to take further water from the Ord River and take water locally. Water that should be sustaining local environments and flows in the Keep River.

I write having worked as a water planner in both the Northern Territory and Western Australia, including writing a water source protection plan for nearby Kununurra and a water allocation plan for groundwaters sustaining the Daly River. I have had the opportunity to understand the ecological significance of these rich well watered, cultural landscapes; and also how the impacts of pastoralism (increasingly involving land clearing on floodplains such as is proposed in this case) and irrigated agriculture, via their individual and cumulative impacts are transforming and degrading an region renowned for its intact ecosystems and majestic landscapes.

1. Not in the public interest

A recurring theme with large developments in Northern Australia is that they may create private wealth for a few individuals, which in large part derives from government subsidies needed for infrastructure and gifted water, but locals who are impacted do not share in these benefits.

This plan continues the trend stating: *the Keep River Plains is part of a larger effort to diversify the NT economy, create sustainable jobs, and position the territory as a*

competitive agricultural producer globally. These developments are expected to create new jobs and foster opportunities in agribusiness, logistics, and infrastructure.

As a long-term Territorian I want to assure you this is not a strategy most Territorians support or that is backed by evidence. Agriculture has a huge footprint, makes a small contribution to the economy (just 4%) and is not a great employer of local people.

Current area: RDA Northern Territory Current benchmark: Northern Territory Comparison year: 2018/19 reset

Did you know? By clicking/tapping on a data row in the table you will be able to see sub categories.

Value added by industry sector

RDA Northern Territory	2023/24			2018/19			Change
Industry	\$m	%	Northern Territory	\$m	%	Northern Territory	2018/19 - 2023/24
Agriculture, Forestry and Fishing	1,350.7	4.5	4.5	1,082.0	4.0	4.0	+268.7
Mining	10,237.5	34.0	34.0	7,951.9	29.6	29.6	+2,285.6
Manufacturing	795.1	2.6	2.6	1,313.6	4.9	4.9	-518.5
Electricity, Gas, Water and Waste Services	486.9	1.6	1.6	450.0	1.7	1.7	+37.0
Construction	1,982.2	6.6	6.6	1,973.0	7.3	7.3	+9.2
Wholesale Trade	881.6	2.9	2.9	911.9	3.4	3.4	-30.3
Retail Trade	930.0	3.1	3.1	831.0	3.1	3.1	+98.9
Accommodation and Food Services	735.0	2.4	2.4	728.4	2.7	2.7	+6.6
Transport, Postal and Warehousing	1,341.3	4.4	4.4	1,293.6	4.8	4.8	+47.7
Information Media and Telecommunications	124.0	0.4	0.4	101.0	0.4	0.4	+23.0
Financial and Insurance Services	739.0	2.5	2.5	672.0	2.5	2.5	+67.0
Rental, Hiring and Real Estate Services	431.1	1.4	1.4	407.0	1.5	1.5	+24.1
Professional, Scientific and Technical Services	910.5	3.0	3.0	1,223.7	4.6	4.6	-313.2
Administrative and Support Services	628.0	2.1	2.1	503.0	1.9	1.9	+125.0
Public Administration and Safety	3,256.2	10.8	10.8	3,123.1	11.6	11.6	+133.1
Education and Training	1,579.1	5.2	5.2	1,389.8	5.2	5.2	+189.3
Health Care and Social Assistance	2,750.1	9.1	9.1	2,091.1	7.8	7.8	+659.0
Arts and Recreation Services	377.0	1.3	1.3	328.0	1.2	1.2	+49.1
Other Services	610.0	2.0	2.0	502.0	1.9	1.9	+108.0
Total industries	30,145.4	100.0	100.0	26,876.1	100.0	100.0	+3,269.3

Source: National Institute of Economic and Industry Research (NIEIR) ©2025. Compiled and presented in economy.id by .id (Informed Decisions). Note: All \$ values are expressed in 2022/23 base year dollar terms. NIEIR-ID data are adjusted each year, using updated employment estimates. Each release may change previous years' figures. Learn more
Please refer to specific data notes for more information

Source: <https://economy.id.com.au/rda-northern-territory/value-add-by-industry>

This proposal exemplifies how big Agriculture does however concentrate wealth in a small number of wealthy corporations and pastoral leaseholders while demanding subsidies from the rest of us. The NT Government has spent over \$58 million in upgrading the Keep River Plains Road, it does not charge for irrigation water and compromised its decision making capacity by participating in enabling activities for

horticulture. In contrast there can be no denying that industrial scale horticulture down the road from the famous Keep River National Park diminishes everyone else's experience of the park.

In another nearby example, the Australia Institute modelling of the Ord River Irrigation scheme found irrigated agriculture employs just 260 people in the region and that between 2009 and 2017 when its study was published, \$364 million had been spent by taxpayers on expanding areas of irrigation by 1,600 hectares, a subsidy of \$227,500 per hectare. This created around 60 jobs, a cost of about \$6 million per job¹.

I call on you to review this proposal on its merits and not make the environment pay the applicant's shifted costs because of unevidenced and nonsense claims that this project is strategically important and will benefit locals.

2. This application appears to be a Trojan Horse - consider the full impact of AAM's plans!

This referral is the first step in AAM Investment Group's staged plans for massive cotton expansion. More dams and clearing are expected with the development of more than 24,500 hectares of land (i.e. the size of a city of 10km x 24.5km!).

The company's plans should be assessed in full rather than treating this project in isolation.

3. Environmental impacts are of National Environmental Significance

This is a very significant proposal. It will impact vital ecosystems including Ramsar-listed wetlands and floodplains. The NT Government has recognised the Keep River Savanna areas as a site of International Conservation Significance². This proposal is at odds with caring for a region of international conservation importance. It compounds the threats introduced by cattle, clearing and irrigated agriculture in the region.

I note the applicant (p20 of the application) tries to leverage existing land degradation on the site to minimise the expected risks of the proposal. This existing degradation highlights the existing stresses that this important conservation region faces. It is essential you hold a line and do not allow further environmental decline.

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<https://australiainstitute.org.au/report/dam-the-expense-the-ord-river-irrigation-scheme-and-the-development-of-northern-australia/>

² Sweetwater Agricultural Development Stage 1

I am **very** concerned about impacts on biodiversity, including many flora and fauna species. There are 39 animal species listed under the EPBC Act known or likely to occur within the Stage 1 proposal area alone, including:

- critically endangered northern quolls
- northern blue-tongued skinks
- endangered Gouldian finches
- Australian painted snipes
- dwarf and largetooth sawfish in the Keep River that are vulnerable to extinction
- endangered Merten's water monitors
- ghost bat.

I object to this proposal as it threatens too many EPBC species and introduces very significant and unnecessary risk. If this was in south-eastern Australia it would be met with a quick 'no'.

Please treat this proposal with the same level of scrutiny as if it were on Canberra's doorstep!

4. Water impacts

I am concerned the project proposes buffers to waterways based on guidelines for clearing. While I oppose more clearing in general this proposal is for irrigated agriculture, involving heavy use of fertilisers and pesticides and intensive activity introducing weeds and other biosecurity risks. These buffers are not intended for this purpose. It is inevitable that this proposal will result in fertilisers and pesticides leaching into the Keep River and important tidal areas vital for migratory birds and marine species, not to mention weeds and other biosecurity risks.

5. Unnecessary bridges

Free flowing rivers like the Keep River are rare. This proposal introduces three further unnecessary structures across the river, bringing erosion risks and disrupting species moving along the river. The proponents are not in a position to properly assess stream hydrology and safeguard the river from these avoidable impacts.

6. Cumulative degradation from pastoral land clearing in the region

The Northern Territory Pastoral Lands Board has approved numerous very large pastoral land applications in the region and is in the process of approving more (thus far it literally has never rejected any proposal). There is a pattern that these clearing

proposals always target the region's grassed alluvial plains like the one that is the target of this proposal.

It is not surprising that these distinctive landforms are being targeted for clearing and intensive agricultural as they are rich and productive. However this applies to resources needed for species and cultural uses too. For example the Gouldian finch relies on grasses like *Chrysopogon fallax* which occurs in these areas. The risk of loss of this feed source is recognised in the species' National Recovery Plan.³

Please intervene and put an end to the 'death by a thousand cuts' gutting

Conclusion

Names are not arbitrary - the proposal is not called Sweetwater and the pastoral lease Spirit Hills for no reason. This is a very large, high impacting proposal in a very significant place.

I request you please reject this proposal outright. If this is not possible please give it the proper consideration it requires for its impacts on threatened species and other matters of National environmental significance, by deeming the proposal a controlled action and subject it to the full assessment process.

Your sincerely,

A handwritten signature in black ink, appearing to read 'Adrian Tomlinson', with a horizontal line extending to the right.

Adrian Tomlinson

³ <https://www.dcceew.gov.au/sites/default/files/documents/e-gouldiae-background.pdf>