## Submission on the referral

## Fortune Agribusiness Funds Management Pty Ltd - Singleton Horticulture Project

This submission is made under regulation 53 of the Environment Protection Regulations 2020

**Government authority:** Power and Water Corporation

## **General Comments:**

"Please be advised that Power and Water does not have any interests in the defined project area. Power and Water does have interests in the regional scale aquifer system from which irrigation water will be drawn, and in particular drinking water supply to the remote community of Ali Curung. While Ali Curung is located approximately 20km distance from the development it is reliant upon water pumped from the same groundwater resource used for community groundwater supply.

On the basis of information provided, it appears that the water extraction from the proposed development will not directly and substantively impact on Power and Water borefield assets. Therefore consistent with previous correspondence in relation to this proposal please be advised that Power and Water Corporation does not object to the proposed water resource development.

However, Power and Water would like to take this opportunity to reiterate and reinforce awareness of the potential for longer term, cumulative drawdown impacts from this development on the community's drinking water source and borefield. Power and Water notes that there is uncertainty associated with groundwater modelling of the potential for enhanced water level decline over the medium to longer term planning horizon. This, compounded by possible combined cumulative impact of other irrigation projects in the region near Ali Curung, means that over the longer terms there is some potential for community water security to be compromised and necessitate premature capital investment in new water supply infrastructure (e.g. production bores). The level of risk associated with this is difficult to quantify based on current data and modelling. Therefore the proposed staged and precautionary approach to development approvals and licencing, incorporating approval hold points (subject to further modelling and assessment of impacts) is strongly supported.

Further, the proposed groundwater monitoring infrastructure, baseline and ongoing monitoring programs should reflect the existence of the community water supply borefield as a 'sensitive receptor' that must be protected. Therefore the groundwater monitoring program should be designed to provide adequate levels of confidence in the modelling of aquifer response to irrigation pumping and any potential future impacts to the water source and borefield at Ali Curung."

We trust that these comments are only interpreted as friendly interdepartmental comments for what they are, and again thank you for the opportunity to allow us to provide these comments.