From: <u>Stephanie Cochrane</u>

To: <u>eia consult</u>

Subject: Community submission to NTEPA

Date: Monday, 13 February 2023 10:56:24 PM

RE: Community submission on the Singleton environmental impact statement

Dear Dr Paul Vogel and the Northern Territory Environment Protection Authority Board,

My name is Stephanie Cochrane. I am a clinical psychologist working in Mparntwe / Alice Springs as well as the Barkly Region. I have been fortunate to call the Northern Territory home for the past 4 years, during which time I have worked with people living across the Top End and Central Desert areas, including the community of Alekarenge / Ali Curung - the residents of which are at risk of being the most impacted by the Singleton Horticulture Project.

I write to you as both a concerned community member, as well as from the perspective of someone who in my work speaks to and connects with individuals and families struggling to survive in the face of ongoing impacts of historic and current decisions made by those in positions of power. In your designated position as the board of the Environment Protection Authority, my hope in writing to you is to appeal to your sense of care for the protection of the environment and your position of responsibility in its stewardship. Alongside your official roles however, as people who also live on and alongside this Country I hope you will take serious pause to consider the potential for great harm and further pain for those whose Country this project will be taking place on.

I am deeply concerned that the Singleton horticulture proposal poses a significant, wide-ranging and inadmissible risk of environmental impacts, and has significant ecological, cultural and social costs that have not been properly considered. As such, I believe the Project requires the *highest* level of scrutiny – that is, a Tier 3 Assessment (an assessment by Environmental Impact Statement), such that all of the potential impacts and risks of the Project are fully known, understood and grappled with as a community.

It seems to me that being one of the largest groundwater licenses in Australia and the largest ever in the history of the Northern Territory, the Singleton horticulture proposal should have necessitated the highest level of environmental impact assessment (Tier 3). That this fact alone has not triggered the highest level of scientific scrutiny is worrying.

It is my understanding that the NTEPA must take into account the significance of the potential impact of the Project when deciding what method of assessment should be utilised. The proposal seems to pose risk of serious and/or irreversible environmental harm, including to groundwater dependent ecosystems, sacred sites, and habitats for threatened species - such as the bilby. It is well understood that arid and semi-arid environments in Australia are already undergoing ecosystem collapse from the impacts of climate change, such as changes to temperature and precipitation, and regional factors such as land clearing and habitat loss, invasive species and impacts from agriculture and industry, including water extraction. The substantial groundwater extraction associated with this Project, as well as the land clearing it requires, will further threaten these at-risk ecosystems.

The potential impacts to vegetation and GDEs of salinisation of groundwater have also not been adequately addressed. Additionally, there have been no on the ground studies undertaken to determine the presence of stygofauna in the impacted aquifers.

Despite claims being made by Fortune, this project does not seem to offer great benefit for the region or for the wider NT community (economic, employment, wellbeing, etc). In reading report based on similar projects in other remote areas in Northern Australia, it is estimated that only 26-36 full time equivalent jobs will likely be filled by residents of the NT, of which only 5-8 full-time equivalent jobs are expected to be from Aboriginal communities in the Barkly region. As a psychologist working with young people and families in the Barkly region, I see the levels of disadvantage, poverty and lack of employment and opportunities. Of course the potential for "local jobs" sounds appealing, however I have serious doubts these jobs - and certainly not the majority of the available jobs - will go to Aboriginal people from communities in the Barkly region. Indeed, I imagine lots of interstate people will be employed, creating significant costs on travel and housing - in a region where housing is already of significant concern.

The proposal threatens up to 40 sacred sites, within its drawdown area. As an individual as well as a health professional, I understand sacred sites to be of utmost importance to the traditional owners of this Country. The damage to these sites would be incredibly detrimental to people whose connection to Country sits at the beating heart of their well-being, their culture, their community, their world

It is my understanding that the NTEPA must take into account the level of confidence in predicting the potential impacts of the Project (ie. taking into account the extent and currency of existing knowledge) when deciding what method of assessment should be utilised. This development is defined by significant risk and uncertainty. Whether it is related to salinity, cultural values, groundwater dependent ecosystems, the groundwater resource or many others, the risks are multiple and significant, and the uncertainty seems outstanding.

It is my understanding that the NTEPA must take into account the extent of community engagement that has occurred in relation to the Project when deciding what method of assessment should be utilised. I do not believe the public was effectively consulted about the impacts on groundwater dependent ecosystems during the assessment of the groundwater extraction licence process. Minimal information was publicly available on the risks to GDEs. Indeed 23,355 people petitioned the Controller to refuse the license, though this was not acknowledged in the Controller's Notice of Decision.

To summarise, it seems clear that there are significant and intense risks to diverse ecological, hydrological and cultural values over a period of many decades as a result of this project going ahead without rigorous assessment and mitigation planning. I sincerely hope that you ensure that the most rigorous level of environmental impact assessment (Tier 3) is applied to this project

Thank you for taking the time to consider this letter. I look forward to your response.

Yours sincerely