

Thank you for the opportunity to comment on the Draft Terms of reference for the Singleton Horticultural project.

In summary, this project has alarming implications, particularly the scale of water extraction, duration of the project and lack of consideration of the natural environment both above and below ground.

This project will produce fresh fruit and vegetables, but according to the original proposal, these will not be available to the local people, except if they are offered an additional plot. The water extraction required for the project threatens the local food on which local Aboriginal people depend for nutrition, spiritual nourishment and trading. This project is unprecedented in scale, and will be one of the largest fruit and vegetable projects in Australia.

Health impacts of the proposal appear overlooked in the terms of reference, but a significant negative impact of the project on the health of Territorians is foreseeable. However because so much is unknown and so little research has been done overall impacts are largely unknown. Because the project's impacts are poorly understood and may be completely unanticipated (particularly with projected changes in the climate), there is a low level of confidence in Fortune's proposed measures to avoid, mitigate or manage them.

I have reviewed the draft Terms of reference for an Environmental Impact Statement. Additional issues that should be addressed:

2.2 Proposal description

1. Projected and possible (10% likelihood) impacts of climate change with respect to

- A. impacts of landclearing, and how these would be magnified by climate change, including species loss, disturbance of pollinators, fragmentation of remaining vegetation, degradation of water sources, increases in dust, spread of invasive weeds and feral animals
- B. water availability, again amplified by climate change, including flash droughts and flooding because of massive changes to the water cycle through extraction, and increases in high intensity precipitation events
- C. flood risk, including frequency and duration of closure of Stuart Highway, either between Singleton Station and Alice Springs and Singleton Station and Tennant Creek.

2.2.6 Transition to post-proposal use

- D. Funding must be held in bond from the time of initiation of the project in case of company closure

2.3.1 Aboriginal stakeholders

- E. Includes Aboriginal people living in or with links to the area who are not traditional owners, because many people were forcibly moved around this region.

2.5 Environmental factors

- F. Specifically, climate change projections over the 30 year life span of the project plus 20 years rehabilitation should be considered, including both low and high emissions scenarios and a range of probabilities for all themes (water, land, air and people)

2.5.5. Community and economy

Matters to be addressed in the EIS

- G. Avoidance, mitigation and management – Advice from NGOs including environmental, social justice and human rights, and Central Land Council in addition to advice from NT government as described in this draft terms of reference.

Public Consultation Requirement

Consultation for a minimum of 60 days is fair because of the scale of this proposal particularly water extraction

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Are you making this submission on behalf of an organisation? N

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