

Northern Territory Environment Protection Authority  
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[eia.consult@nt.gov.au](mailto:eia.consult@nt.gov.au)

Chloë Mason  
XXX  
XXX  
XXX 2010  
XXX

12 February 2023

Dear Madam/Sir,

### **Proposed Singleton Water Licence**

#### **My relation to this project**

While I am a resident of inner Sydney, I have contributed to ecological research in arid zones (SW Queensland – habitat of the kowari – a marsupial similar to the bilby) and western NSW, as well as reviewing EIA for regulators and for preparing EIS for proponents.

I have an honorary appointment as an Industry/Professional Fellow Institute for Sustainable Futures, University of Technology Sydney.

I have an ongoing commitment to the conservation of the natural, native environment. I have supported financially funds for conservation of threatened species, like the potoroo and bilby and am a regular donor to Bush Heritage for conservation. Professionally, I have worked for the NSW EPA as regulator and in public consultations for proposed development. Since then, I have worked on climate change and its impacts on ecological communities as well as policy and contribute to matters relevant to Australia's contribution to the UN Decade for Ecosystem Restoration.

#### **Objection to proposal and expression of concern for anticipated destruction and harm to the environment and cultural heritage**

Therefore, following the advice of custodians of the country, represented by EDO, I express my objection to the Singleton horticulture proposal because of its likely severe damage to the environment, threatened species, and cultural heritage.

#### **Some specific matters of concern about the environmental impact**

- Size and scale of proposal

- Proposed abstraction of groundwater on which ecosystems depend (a terrestrial habitat of 40km in diameter – also causing habitat severance)
- the inadequacy of NT legislative framework for public consultation and consideration in decision-making
- the proposed abstraction of water now in the age of the Anthropocene where the impacts of climate change are so evident needs particular attention
- In 2023, it is unacceptable that the proponent has not included an estimate of its greenhouse gas emissions and what measures it would take to reduce them, avoidance rather than offsetting.
- land clearing is recognised as a major contributor to the drastic threats to the environment revealed in the 2021 *State of the Environment Report*, released only last year.

### **Further concern about due process and proper treatment**

I understand that in the proponent's self-assessment of its proposal, many risks have been rated as low or medium. Given the physical scale, uncertainties and duration of the effects of this proposal, such assessment seems pretty worthless. This farce of assessment is particularly odious in the face of

- (a) the disregard by the licencing administrator for the public expression of concern and objection made by over 20,000 people including the traditional custodians of the land;
- (b) the lack of fieldwork reported by the proponent!

The job-creation benefits are meagre. Set against the 40 threatened sacred sites, there is not even a reasonable claim for a balancing act.

Here I reiterate some other arguments that are compelling:

- (1) It is unacceptable that the proponent does not consider the destruction of up to 30% of GDEs on Singleton Station to be an environmental risk, based on a DEPWS guideline, which has not been open to public consultation and was in conflict with the relevant water allocation plan. This is a non-statutory guideline which is not enforceable and should not dictate what constitutes a significant impact.
- (2) It is unacceptable that the proponent has not undertaken any meaningful fieldwork to comprehensively visit the GDEs occurring within the impacted area or identify threatened flora. This is despite acknowledging that GDEs are known for their ability to support higher biodiversity and productivity than surrounding landscapes and may be an important underpinning of persistence of resident flora and fauna species.

(3) It is unacceptable that the proponent has not undertaken any meaningful fieldwork to investigate the occurrence of threatened fauna, despite occurrence of near threatened species near the site, including bilby (a disused bilby burrow was identified 4 km of the site) and grey falcon records within 3 km of the site. The loss of large trees such as ghost gums which are associated with GDEs would be expected to reduce habitat for threatened species, the grey falcon.

**My request: the NT government require the application of the most rigorous level of environmental impact assessment (tier 3).**

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

Yours sincerely,

Chloë Mason

PhD (UNSW), M.Env. Stud(UNSW), B.Laws and Grad.Dip.Leg.Pract. (UTS)