

## Submission - Singleton Water License

To the EPA,

Please accept this submission on behalf of Australian Parents for Climate Action Northern Territory (NT). We represent hundreds of climate concerned families across the NT. While we primarily focus our attention on advocating for a safe climate for NT kids we are also committed to ensuring a healthy and prosperous environment for our young people.

Across the Territory water is the lifeblood of our landscapes and living ecosystems. We have seen over recent years some very concerning moves in terms of how our most precious resource is managed and the Singleton water license is extremely concerning. It is staggering that a proposal to extract 40 000 million litres of water every year in an arid landscape would even be contemplated – that's close to a trillion litres over 30 years. What will that country look like in 30 years once this much water has been extracted? What will be left for the young people and traditional owners for that country? What will happen to their sacred sites and bush foods?

We find the Singleton water license application alarming and we ask that the Terms of Reference (ToR) include protections for groundwater dependent trees, soaks, springs and swamps which are likely to be impacted, with the water table predicted to drop by up to 50m in some areas. These ground water dependent sites support a diversity of life, from nesting trees and hollows for birds and owls, to food sources for native bees and other insects, to foraging sites and habitat for reptiles and mammals. They provide critical habitat and refugia especially in our changing climate where water will become increasingly scarce.

Often these water dependent sites also hold cultural significance. It is hugely concerning that these culturally and ecologically valuable sites could be placed at risk.

We urge the EPA not to adopt the NT government's guideline that allows for 30% destruction of groundwater dependent trees. This rule has no scientific basis nor is it in line with the wishes of traditional owners and it does not accord with the principle of ecological sustainability.

We ask that further flora and fauna surveys are conducted given the previous surveys were carried out during 2019 which was one of the hottest periods with the lowest rainfall on record and so surveys from this period are not reliable. This extreme climatic event was referenced in the biodiversity assessment report where it stated it likely influenced the survey results.

There is no mention of threatened species in the ToR and we suggest this should be included. There have been reports of sightings of grey falcons in the area that is likely to be impacted.

In relation to this alarming water license application we urge the EPA to apply the strictest interpretation of the following: the precautionary principle, the principle of evidence-based decision-making, the principle of intergenerational and intragenerational equity, the principles of sustainable use, and the principle of conservation of biological diversity and ecological integrity.

The objects of the Environment Protection Act are to “protect the environment of the Territory and promote ecologically sustainable development so that the wellbeing of the people of the Territory is maintained or improved without adverse impact on the environment of the Territory”. As it stands the singleton water licence proposal appears totally at odds with that objective and also threatens the wellbeing of Territorians especially traditional owners and those living near the proposed site.

We urge the EPA to apply the highest level of assessment and scrutiny to this water license application.

Kind regards,

Alice Nagy on behalf of Australian Parents for Climate Action – NT.