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To: [eia_consult](#)
Subject: Singleton Station Horticulture Project - Environment Impact Assessment
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Ground water is a finite resource. I believe that the Singleton horticulture proposal poses risk of serious, irreversible environmental harm including to groundwater dependent ecosystems, sacred sites, habitat for threatened species, including the bilby.

The only flora and fauna surveys were conducted in 2019, which had the highest daily maximum temperatures in NT history, was during a period of multi-year drought and 2019 had the lowest rainfall on record in the Barkly. Conducting surveys during the most extreme heat period on record cannot capture representative data to inform a baseline.

The NT Government in reporting of the Biodiversity Assessment for that region acknowledged this: "The region experienced well below average rainfall for several years prior to our survey, with drought conditions evident in the study area during field surveys. Further to the poor weather conditions, much of the study area is under intense cattle use with cattle impacts most evident where there was a shallow depth to groundwater. The environmental conditions, in concert with cattle impacts, are likely to have influenced our survey findings and adds some uncertainty regarding what flora and fauna may be supported during 'normal' or wet periods, and with respect to identifying areas with high biodiversity value in the study area"

How can a project like this be allowed to proceed without really knowing all that is likely to be affected.

It gets worse. This project at full production will bring approximately 40,000 tonnes of salts to the surface every year. As the Risks of salinity due to irrigation developments in the Western Davenport Basin, Northern Territory makes clear the region is at high-risk of salinity impacts and the 'predicted salinity increase has very significant implications for the long-term viability of irrigated agriculture'.

I welcome the proposed salinity assessment which will assess cumulative impacts of salts, salts in the leached irrigation water, incorporate field observations (including soil and groundwater salinity data) and that a rigorous solute transport model assessment will be conducted. But I worry that it may be too little, too late.

I believe that the terms of reference for the Environmental Impact Assessment must reflect the concerns and interests of Traditional Owners and the public by protecting all groundwater dependent ecosystems. The level of protection should not follow the advice from NT government agencies which does not reflect the critical importance of these areas.

I work in tourism, one of the largest employers in the NT. People come to the NT to see it's natural wonders. A proposal of this magnitude cannot help but have a negative impact on the natural environment of a large area, The possible impacts on tourism need to be considered as well,

Thank you for considering this submission.

Yours sincerely,
Russell Willis

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