

**From:** [Vin Lange](#)  
**To:** [eia\\_consult](#)  
**Subject:** Comment on ToR for the Singleton EIS  
**Date:** Wednesday, 13 September 2023 5:24:48 PM

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Dear NTEPA,

Centrefarm Aboriginal Horticulture Ltd has significant concerns over the potential environmental impacts of the Singleton Horticulture Project. **We believe the Singleton Horticulture Project requires strong Terms of Reference (ToR) when preparing its Environmental Impact Statement (EIS).** This must ensure that all the impacts and risks of the project are fully known and understood.

We are particularly concerned with:

- the significance of the potential impact of 40,000 ML/year of groundwater extraction;
- the level of confidence in predicting the potential impacts this may cause;
- the potential impact of the project on Groundwater Dependent Ecosystems (GDEs);
- and how the Singleton drawdown will affect our current and planned proximate projects, particularly our localised GDEs
- the substantial knowledge gaps in the data and the lack of adequate baseline studies;
- the proponent's, or the administration's, ability to adequately monitor, measure, mitigate, manage, and avoid potential significant impacts, particularly with such a short time period until peak capacity;
- the local and regional opposition to the unprecedented size of the groundwater extraction licence which is 24,600 ML/year greater than the largest groundwater licence in the NT.

Please see below our recommended ToRs:

1. **Additional groundwater modelling that is 'in sync' with other approved groundwater-extraction-licences (GWEL) in the Central Zone along with drawdown, and an independent peer review**
2. **Additional detail on the effect and value of GDEs both on Singleton and proximate land parcels including the source of water for the GDEs. As a neighbour charged with the development of proximate lands on behalf of Traditional Owners, the Singleton drawdown has detrimental effects on how GDEs are affected on our land parcels**
3. **The effect on the salinity of the resource resulting from 40 GL being extracted, i.e. how salinity may enter the system in long periods of drought and the effects of climate change**
4. **Generally more information on how climate change will affect every aspect and risks in extracting this quantum of water**
5. **Alternative bore field design(s) to mitigate the effects of extracting this quantum of water. Including designs that draw on deeper sediments**
6. **More details on the groundwater resource, including rates of flow and**

- direction, connectivity with surface water (swamps and springs)**
- 7. Thorough and detailed flora and fauna surveys to act as baselines for measurement as part of Singleton's adaptive management protocols**
  - 8. A complete and honest social impact assessment**
  - 9. Attention to the lack of local social licence**
  - 10. Make sure that all information is digestible to everyone, this will require very graphic and 3-D models**

Please note, we give permission to NTEPA to publish the above information.

Best regards,  
Vin

Vincent Lange

CEO

**Centrefarm / TopEndfarm**

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**Centrefarm Aboriginal Horticulture Ltd**