

Fortune Agribusiness Terms of Reference for the Environmental Impact Statement

Key Environmental Values

The extensively linked underground water system underpinning the nature of the NT is unique and fragile. It has taken thousands of years to create these underground lungs for a hot, mostly dry region, enabling the growth above ground of woodland habitats that have supported flora, fauna and human life for millennia. Old growth trees, such as ghost gums, coolibahs, bloodwoods and river red gums provide shade, protection and breeding habitat for a wide range of flora and fauna. Not least, these areas are dotted with soaks and springs that provide water for survival and have significant cultural values for the Aboriginal people who have inhabited this region for thousands of years.

Disturbance of this unique system by the unprecedented water volume extraction proposed, is a major risk to its survival and all the species that rely on it for life. An extremely cautious approach is needed for any water to be extracted, to ensure that this system is not depleted beyond its capacity to recover.

Existing information shows that if this proposed volume of water is taken, groundwater levels will drop, threatening the existence of old growth woodland and the flora and fauna that rely on them for survival. It is suggested that a 5 metre drawdown (and up to 50 metres at the centre) in 50 years is acceptable, but at this drawdown, old growth trees will die. This potential result does not meet the requirement of the Environment Protection Act 2019 of “without adverse impact on the environment of the Territory”.

Cultural Values

First Nation peoples have inhabited this region for thousands of years. Water is a human right. Water is sacred to these inhabitants, and without it, both they and their culturally valued places will not survive. This is untenable.

“Without water we will all perish...water is the most precious thing in the world today...Let’s not destroy the land”

Maureen Nampijinpa O’Keefe Chairperson Running Water Community Press

“You can’t own the water, you cannot buy water, just like you can’t buy love”

Miliwanga Wurrben Rebarranga Traditional Owner

Summary of Impacts

Land clearing resulting in:

- Loss of top soil and water flow barriers
- Introduction of invasive species and weeds
- Loss of biodiversity
- Loss of breeding habitat for all species, including endangered species
- Destruction of sacred sites

Water extraction:

- Beyond capacity to recharge

- Lowering depth of ground water resulting in death of flora and fauna dependent on it
- Increasing salinity at surface

Intensive agriculture

- Fragile soil depleted quickly enshrining total reliance on chemical fertilisers into the future
- Water run-off rich in fertiliser resulting in foreign plant species/weeds to flourish in water ways and underground
- Potential for contamination of ground water with toxic chemicals used

Mitigation measures

- Dramatic reduction in water volume approved for extraction
- Investigation of more appropriate crops which require much less water to survive
- Investigation of crops that are native to this region e.g. native grasses for seed
- Prevention of mass land clearing and preserve wildlife corridors and water ways
- Requirement for rigorous weed monitoring and management

Stakeholder Engagement

This application does not pass the pub test. The volume of water requested to be extracted from the underground water system is not based on science but on a 'develop at all costs' mindset.

Stakeholder engagement must be genuine and provide Traditional Owners with correct information regarding potential impacts and risks of the project.

Requirements for the Terms of Reference

For the reasons outlined above, this EIS must address and reassure Territorians that the approved water extraction volume will:

- protect the environment of the Territory
- 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.

In addition, principles to be applied include the precautionary principle, the principle of evidence-based decision-making, intergenerational and intragenerational equity, the principles of sustainable use, and the principle of conservation of biological diversity and ecological integrity.

Key Items to Include

1. Protect and maintain ground water level dependent ecosystems – trees, soaks, springs and swamps

Peer reviewed independent research must be done to ascertain best evidence for actual impact to the ground water system and the precautionary principle applied to ensure that no part of the ecosystem will die.

2. Independent evidence-based decision making

The Northern Territory Government Guideline: Limits of acceptable change to groundwater dependent vegetation in the Western Davenport Water Control District (the Guideline) and its rule to destroy 30% of groundwater dependent vegetation is unacceptable. This guideline has no

scientific basis for the semi-arid zone and is a catastrophic departure from ecologically sustainable development. It must not be applied.

3. Conduct further surveys of flora and fauna

Current information regarding the flora and fauna of the region is inadequate, having been undertaken during a drought period when species do not flourish. Further extensive surveys of the region with assistance from local Traditional Owners will provide a more reliable report of the flora and fauna who live and breed in this region

4. Protect threatened species

Loss of habitat will be detrimental to all species but in particular, understanding and preventing adverse impact on threatened species is critical

5. Ensure impacts of salinity are considered

The report "Risks of salinity due to irrigation developments in the Western Davenport Basin, Northern Territory" makes clear that this 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'. The proposed salinity assessment must be included. Salinity must be understood and include cumulative impacts of salts, salts in the leached irrigation water, incorporate field observations (including soil and groundwater salinity data) and a rigorous solute transport model assessment.