

From: [REDACTED]
To: [eia_consult](#)
Subject: Submission: draft TOR - Singleton Horticulture Project
Date: Wednesday, 13 September 2023 1:04:21 PM

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Full name *: [REDACTED]

Email address *: [REDACTED]

Telephone: [REDACTED]

Address: [REDACTED]

Are you making this submission on behalf of an organisation? Y/N= **NO**

Acknowledgement

I acknowledge that any request to withhold my submission or part of my submission from publication will be considered by the NT EPA, and that the NT EPA may still decide to publish my submission or part of my submission in accordance with regulation 269 of the Environment Protection Regulations 2020.

I understand that my comments will be provided to the NT EPA and government authorities.

I understand that, if my comments relate to the environmental impact assessment of a proposal, my submission will be provided to the proponent and used by the NT EPA to inform its assessment.

I understand that a request not to publish the submission or part of the submission, does not make my submission exempt from disclosure, and that even if NT EPA decides not to publish the submission or part of the submission, my submission and identifying information may still be disclosed if required under the Information Act 2002 or under any other applicable law.

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I request that my submission not be published *: Y/N

Submission contents:

I am currently a resident of the Northern Territory with an interest in protecting groundwater systems, aquifers, surface water flows and waterways flows that sustain our delicate ecology. **The scale of the proposed groundwater licence for the Singleton Horticulture Project / Fortune Agribusiness' development represents a major risk to the ecology of the region. It will dramatically reduce the groundwater table.**

Removal of 40 billion litres of groundwater each year (for up to 30 years) is a major risk to the ecology in this arid zone. This proposal fails to adequately consider the impacts on the flora and fauna dependent on the proposed groundwater extraction and furthermore it fails to consider the cultural and environmental impacts on the Traditional Owners who live on the surrounding land. The Traditional Owners are already observing massive pressures on these ecosystems due to temperature increases and subsequent drought caused by climate change. This water extraction will further compound all of these impacts. This delicate environment is an inappropriate location for this scale of farming.

The Environment Protection Act 2019, states that the **NT EPA must apply principles of ecologically sustainable development** to all proposals. The Singleton Horticulture Project / Fortune Agribusiness' development proposed development threatens to damage and destroy a 50km stretch of groundwater dependent ecosystems, which includes 40 sites sacred to Traditional Owners. The proposed development does not adequately consider the impacts on groundwater dependent trees, soaks, springs and swamps and is therefore does not meet criteria for ecologically sustainable development.

Threatened species are not mentioned in the Northern Territory Environment Protect Authority (NT EPA) Terms of Reference (ToR) for Singleton's Environment Impact Statement (EIS) details to assess Fortune Agribusiness' development. 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. **Major uncertainty exists around the presence and absence of threatened species due to the deficient biodiversity baseline assessments.** Further fauna and flora surveys must be conducted to improve what constitutes a baseline for this region.

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'.