

Northern Territory Environment Protection Authority
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To Whom it May Concern,

I am a resident of Alice Springs and have had a long-term commitment to understanding and appreciating arid-zone ecosystems. Furthermore, I have a long-term commitment to remaining in Alice Springs and an interest in the sustainable management of the environment in which I live, from my own perspective and from the perspective of my family and my community.

I have a background in irrigated agriculture and horticulture, and have post-graduate qualifications in irrigation management. I have supported the monitoring and evaluation of natural resource management projects and I am currently studying for a post-graduate qualification in groundwater hydrology.

I am seriously concerned that the Fortune Agribusiness Project at Singleton Station poses a significant and unacceptable risk to the environment. It is acknowledged in the Project Proposal that there is currently insufficient data to know what the environmental impacts of the project will be, and it is my concern that the groundwater monitoring and adaptive management plan proposed for the project will most likely be incapable of effectively measuring, mitigating or reversing those impacts.

My primary concern is that the adaptive management regime is being both designed and implemented by the proponent, Fortune Agribusiness. There is no discussion in the plan of the requirement for expert third party monitoring, as recommended in the Productivity Commission's National Water Reform 2020 Report. Involvement of Traditional Owners in the monitoring of groundwater dependent ecosystems is useful but insufficient, and the mention of 'NTG' as a monitoring body is meaningless without further defining what expertise would be brought to bear. The trigger of 10% reduction in ecosystem quality is impressive but similarly meaningless without further definition.

Noorduijn *et al* (2019) suggest that adaptive management will only be successful if volumetric allocations, trigger-level management, and buffer zones are used in combination. There is no mention of the role of volumetric allocation in the Singleton adaptive management plan, possibly because Fortune Agribusiness is responsible only for trigger-level management and the establishment of buffer zones, and Government is responsible for volumetric allocation. It is not apparent that Government contributed to the development of the adaptive management plan.

In the absence of a single management or regulatory body for the adaptive management plan, Government will be under significant political pressure to maintain volumetric allocations, and Fortune Agribusiness will be under significant commercial pressure to maintain productivity, which is explicitly tied to maintaining levels of groundwater extraction. It is my contention that the environment will come a very distant third.

This is further complicated by Singleton being a 'green field' site. Nobody knows whether the volumetric allocations, the trigger levels as proxy indicators of environmental stress, or the approach to buffer zones are correct and there is no process apparent in the adaptive management proposal for these assumptions to be tested.

Recommendations

- 1) That the assumptions underpinning the adaptive management plan, specifically the volumetric allocation, trigger levels and the approach to buffer zones, are tested, and continuously monitored

and evaluated as to the extent they are useful contributors to the management and conservation of groundwater dependent ecosystems.

- 2) That the implementation of the adaptive management plan is independently monitored and assessed.
- 3) That the most rigorous level of environmental impact assessment (Tier 3) is applied.

Yours sincerely,

Andrew Kenyon

Mparntwe 13/02/2023