

Ms. Christine Burke

Mparntwe, Alice Springs

NT

13/2/2023

RE: The Singleton Horticulture Project

Dear Environment Protection Authority.

I have been a resident of Mparntwe, Alice Springs since 1990. For thirty years I have worked as a Geography and Special Education teacher in public education in this town. Over these years I have continued to learn from Aboriginal people – parents, students, local custodians, teachers, social workers, and friends, about their strong, vibrant, and significant connection to this land and its interdependence with their and our health.

Concurrently my connections with an amazing array of non-indigenous people (includes lawyers, anthropologists, health workers) attest to and embellish this specific and all-encompassing depth of knowledge.

Last year I felt compelled to know more about the Singleton Horticulture Project. It was said that the Singleton Station Water Licence is the largest groundwater licence in the history of the NT. The project is proposed in an Arid Zone and the water is to be free to the Project Developer, Fortune Agribusiness. How could this be successful, fair or viable?

I attended the Supreme Court Hearings in relation to this development in Alice Springs last year. I have also attended meetings run by the Arid Lands Environment Centre and the Central Land Council. My reading of related documents by both organisations as well as my length of time and involvement in community development (via Public Education advocacy) leads me to have serious concerns about this project around three major issues that our NT Government needs to answer.

These highly significant issues are:

1. The Government's commitment to proper environmental assessment and true and respectful consultation processes with Indigenous people from this area as well as the broader public.

A critical question that needs to be answered is –

Why was the water licence granted to the Singleton Horticulture Project before an Environment Impact Assessment was made?

The more one reads and listens to information to consider for this proposed development, it sends alarm about the significant negative impact this could have on people and the environment which may be irreversible.

Another critical question that needs to be answered is –

Why hasn't proper environmental investigation and data gathering been asked for in relation to significant harm and negative impact that this development may have on groundwater dependent ecosystems, sacred sites, threatened species and the environmental collapse of this area over the life of this project?

2. The Government's commitment to sustainable water management and respectful

relationships with traditional owners of this land. This seems to be questionable given the following points.

The water for this development is free. This seems to be an ignorant approach to a significant and scarce resource to say little of the lack of clarity in modelling to predict the water capacity in this area. Let alone respectful acknowledgement of the traditional owners of this area.

The salient and alarming points raised in the Addendum- Aboriginal Cultural Values Impact Assessment Singleton Water Licence Drawdown Area by Susan Dale Donaldson, 7th February 2023 attests to the highly significant concerns and impact that this development would have as I quote from the Executive Summary –

"These values... (maintaining spiritual connections and protecting sacred sites; undertaking ritual activity; upholding ecological knowledge associated with natural resources; continuing customary roles and responsibilities; and being able to live and travel on country)...primarily relate to social and spiritual themes linked to surface water, groundwater dependent ecosystems, and other features across the Singleton Water Licence Drawdown Area (SWLDA). The values relate to cultural places within the SWLDA, as well as cultural practices and traditions directly associated with the SWDLA. The cultural values across SWLDA are maintained by the Traditional Owners today and are deeply rooted in their heritage and form the framework for their future."

3. The Government's commitment to the rule of law.

It seems that there is a lack of transparency and informed knowledge and understanding of the impact of the Singleton Horticulture proposed development.

A critical question that needs to be answered is –

Why did the Department of Environment, Parks and Water Security set Guideline limits on the impacts from development on Groundwater Dependent Ecosystems, GDEs, by protecting 70% of GDEs, thereby permitting the destruction of 30% of GDEs as acceptable change to groundwater dependent ecosystems?

Clearly, the most rigorous level of environmental impact assessment needs to be applied to this proposed development. I therefore request that Tier 3 environmental impact assessment be applied.

Yours sincerely

Christine Burke