

12 Feb 2023

To whom it may concern,

I am a resident of Alice Springs (*Mparntwe*) and have a deep affinity with the red centre of Australia. I have also worked in the environmental profession for my entire career, but am writing today in a personal capacity. I wish to express my serious concern for Fortune Agribusiness' horticulture proposal on the Singleton Station. I strongly believe that the Singleton proposal poses an unacceptable risk of impact on the local environment and traditional custodians.

I am aware that the NT EPA is currently assessing whether the proposal requires environmental impact assessment and offer my strong belief that the proposal requires a Tier 3 assessment to ensure that the environmental impacts are properly considered. I will outline my concerns for the project below, along with why I believe a Tier 3 assessment is required.

The Singleton proposal is the largest groundwater extraction licence to be granted in the NT, making it one of the most significant ground-water related projects for the NT EPA to consider. Fortune's modelling indicates that this level of groundwater extraction would lower the water table up to 50m. It is known that a number of Groundwater Dependent Ecosystems (GDEs) exist in the region affected by the drawdown of groundwater for this project and that these GDEs typically cannot access ground water below 15 metres. This means that the proposal poses a serious and unacceptable risk to the persistence and condition of Groundwater Dependent Ecosystems in the region. Fortune's groundwater modelling permits the destruction of up to 30% of GDE's in the region, and **I am astounded that Fortune does not consider this to be an environmental risk.** With the episodic nature of groundwater recharge noted in the Northern Territory Government's 2021 *Western Davenports Water allocation Plan*, it seems likely that the proposed level of drawdown will have a severe and irreversible impact on the GDE's in the region.

The significance of this project is also borne out in its potential impacts on threatened species. Groundwater dependent ecosystems are known to support higher levels of biodiversity than surrounding areas and often contain threatened or rare flora. The Thring Swamp Site of Botanical Significance occurs within the proposed drawdown area, and is indicative of the floral values of the region. 8 threatened fauna species may be impacted by the proposal and the biodiversity assessment completed to date does not give adequate confidence in the presence or absence of these species. Desktop information for threatened species is notoriously unreliable in the NT due to the paucity of rigorous scientific surveys. In addition, the on-ground surveys conducted to date occurred in 2019, one of the driest years on record. It is well known that many desert species experience 'boom and bust' population cycles, and that conducting surveys during dry periods is unlikely to adequately detect the presence or absence of threatened species. This issue was also identified in GHDs Biodiversity Assessment report for the Singleton Horticulture Project, commissioned by Fortune for the project (page 50). With this, there can only be a low degree of confidence in the potential impact on threatened species with the information currently provided.

Fortune's proposal is also significant in its potential impact on aboriginal cultural values. Susan Donaldson's report, *Singleton Water Licence Aboriginal Cultural Values Assessment*, indicates that 29 sacred sites exist within the drawdown zone modelled by Fortune and that all of these 29 sites have features associated with groundwater dependent ecosystems (such as soakages, springs,

red gum trees and more). I believe that the water extraction poses a serious risk to aboriginal cultural values, and that Fortune's proposal does not propose sufficient measures to avoid or mitigate this impact.

I also believe there is a lack of confidence in the potential impacts and mitigation and avoidance measures in Fortune's proposal. The scale of groundwater extraction proposed means that there is little confidence that impacts can be properly understood with the information provided by Fortune to date. Loss and damage to GDE's can occur very quickly as some GDEs will only begin to show signs of decline once an ecological tipping point is reached, meaning they will no longer be able to recover even if water is restored.

Finally, I do not believe that the extent of community engagement has been adequate to date for the proposal. I also have serious concerns that the communities and individuals likely to be most impacted by the proposal have been given sufficient time and capacity to assess and understand information for the proposal and its potential impacts. Individuals likely to be most impacted by the proposal are the traditional owners for the Singleton lease and surrounding lands. Aboriginal people are known to have lower levels of literacy and numeracy than other Australians, and I have severe concerns that these community members would not have a proper grasp of the information available to date. In addition, I do not believe that Fortune have adequately engaged with the community about this proposal. I have only been made aware of many aspects of this proposal by third party entities who have spread information about this project. I was not aware of any community engagement efforts of the project proponent.

Due to the above reasons, I am of the respectful opinion that a Tier 3 assessment under the NT EP Act is the only way to ensure a rigorous understanding of the environmental and cultural impacts of Fortune's Singleton horticultural proposal will be achieved. Applying a Tier 3 assessment will allow the impacts of the project to be better understood and reduced, including the risk to GDEs, threatened species and aboriginal cultural values. A tier 3 assessment will also allow the project proponent to better communicate the project impacts to affected individuals and communities and allow sufficient time for them to assess and understand the impacts.

I sincerely thank you for taking the time to consider my letter. I look forward to your response.

Your sincerely