

Dear EPA Board

I am writing as a community member living in Mpartnwe/Alice Springs because I have concerns about the significant environmental and cultural impacts posed by the Singleton Horticulture Project proposal ('the project').

I understand that the groundwater licence for the project presently authorises the extraction of 40, 000 ML of water a year and is the largest groundwater licence granted in the Northern Territory by a significant margin. I also understand that there are substantial knowledge gaps in the existing analysis and data concerning the environmental impacts of this project, including significant uncertainties about the nature of the water resource. This is within a context of existing ecosystem collapse and water scarcity in arid and semi-arid environments across the country, linked to climate change and various regional factors.

Given the scale of this project, it deeply concerns me that a water licence was granted in the first place without an environmental impact assessment and extensive consultation with Traditional Owners. However, at this stage, it seems vital that at a minimum the project is subject to the highest tier of assessment – Assessment by Environmental Impact Statement – so that the environmental and cultural impacts can be fully understood. The most democratic and rigorous form of assessment should be applied, and community members must have the opportunity to comment on the proposed terms of reference, the draft environmental impact statement, and the Supplement to the EIS. Anything less thorough carries the risk of facilitating poorly understood and possibly catastrophic consequences for decades to come.

An obvious concern pertains to the potential impacts on vulnerable species, for example, the greater bilby; a unique, special, and celebrated marsupial, often depicted as Australia's Easter Bunny due to the efforts of conservationists. It does not take a scientist to understand that marsupials like bilbies offer much to the ecosystem, regenerating native plants and restoring soil in the desert. I am highly concerned by the lack of recent research and comprehensive surveys on threatened species in the proposed project area. While I note a Biodiversity Assessment has been completed for the Project, I also note that it relies on a desktop assessment and a very limited survey work completed during an unusually dry period in 2019. It is clear that much more data needs to be collected to ensure the risks of the project on threatened species are mitigated and our feathered and furry treasures are protected.

I am particularly concerned about the impacts the project will have on sacred sites and associated cultural values. I refer to the cultural values assessment commissioned by the Central Land Council in 2021 and undertaken by anthropologist Susan Donaldson. Donaldson's assessment included consultations with 80 traditional owners and identified 40 sacred sites existing in the drawdown area and a further 11 sites within the wider impacted alluvial/sandplain region. The country surrounding the proposed site is rich in songlines and cultural sites that depend on underground water and I note the survey participant's concerns about how the level of water extraction will impact their ability to fulfil custodial roles and responsibilities. As Donaldson concludes:

"Based on in-depth discussions with Traditional Owners when undertaking this assessment, it is clear that Traditional Owners would prefer to sustain the current health of their country and maintain their custodial responsibilities to it by not approving the Singleton Water Licence, rather than the alternative scenario of seeing their country get sick, having their traditional rights and interests eroded, and holding the psychological stress and guilt associated with knowing their descendants may lose important cultural values which have been sustained by Kaytetye people for thousands of years."

No project in the Northern Territory should be given the green light until it can be outlined in the most comprehensive terms how sacred sites will be preserved and cultural values upheld and if this is not possible, the project should be ceased.

Water scarcity is no doubt one of the key issues brought about by climate change and its effects are only becoming more familiar. The Singleton horticulture cannot be viewed in isolation: The EP Act recognises the environmental impacts of such projects may be cumulative and this project sits in a wider context of an array of development proposals and projects within the region. Approvals for such projects are matters of intergenerational justice. To allow a project of such a scale without the requirement of an EIS and the consent of Traditional Owners would be, in my view, reprehensible.

Thank you for your consideration of this letter. I look forward to your response. Sincerely,
Imogen McKay