

Dear EPA members

As someone who lives and works in Alice Springs, I write to express my serious concern regarding the Singleton Horticulture Project Proposal (the **Proposal**) and its potential significant impact on the environment. The Proposal should unequivocally be subject to assessment by environmental impact statement (Tier 3) in accordance with rr 58–59 of the *Environmental Protection Regulations 2020* (NT).

### **Low confidence in predicting impacts**

The Referral contains considerable knowledge gaps which can only be adequately addressed through a rigorous environmental impact assessment. While the referral documents appear extensive and make assessments of low or medium risk, a closer look demonstrates their lack of adequate fieldwork, for example, on the impacts on Aboriginal cultural values, threatened fauna, and the interrelated or cumulative impacts of salinity on groundwater dependent ecosystems and vegetation. A Tier 3 assessment is required to adequately address these knowledge gaps.

### **Aboriginal cultural values**

In contrast, one area that has been demonstrated through appropriate fieldwork as having a high risk of significant impact is regarding Aboriginal cultural values. Susan Donaldson's Report, *Aboriginal Cultural Values Impact Assessment*, and its recent Addendum demonstrate this clearly through extensive consultation. These studies identify an extremely high risk of loss, degradation or damage to highly significant cultural values, including groundwater dependent sacred sites. The Proponent is yet to undertake such consultation or to adequately engage with these findings. It is imperative that these impacts are subject to the most rigorous assessment by the EPA before making a recommendation to the Minister.

### **Scale of water extraction**

The groundwater licence relating to the Proposal is the largest granted in the Northern Territory by far. The Proponent's own modelling indicates a lowering of up to 50 metres in parts of the aquifer (Appendix R to the Referral). The potential impacts of this lowering on the environment, including on groundwater dependent ecosystems, are highly significant. This is amplified by the project's situation within the arid zone of the Northern Territory, and the low recharge. It is readily apparent from the scale of water extraction that the Proposal should be subject to rigorous scrutiny.

### **Low public engagement**

There has been minimal public engagement and consultation on the Proposal so far. Personally, I only found out about the Proposal through word-of-mouth. Friends and people I know in affected areas such as Ali Curung have had barely any consultation, barring the publication of a media release in the local newspaper and the occasional flyer, and are not aware of relevant material to inform themselves about the Proposal and the impacts of it. The Proposal appears mired in secrecy, and it is necessary for the EPA to assess it rigorously, so the public and affected community can be fully informed and engage in democratic process surrounding it. As a resident of the Northern Territory with ties to affected communities, I can state that this has not yet taken place.

For these reasons, I request that the EPA Board undertakes an assessment by environmental impact statement (Tier 3). Thank you for consideration, and I look forward to contributing feedback on the draft terms of reference of the Tier 3 assessment.

Yours sincerely XXXXX