

Northern Territory Environment
Protection Authority
GPO Box 3675
Darwin NT 0801

12/02/2023

RE: Singleton Horticulture Proposal – EPA Referral

Dear Dr Paul Vogel,

I am a resident of Mparntwe and have the privilege of living and working in and around the beautiful arid and semi-arid environments of Central Australia. My work also gives me access to the deep knowledge and dynamic cultural systems of First Nations custodians.

I am extremely concerned that the Singleton horticulture proposal poses significant impact to the Centralian environment and to cultural values connected to the landscape.

Ultimately, I urge the Environment Protection Authority to undertake a Tier 3 environmental impact assessment of the proposed Singleton project. The following submission outlines my main concerns.

Overall

The arid and semi-arid environments of Australia are *at-risk ecosystems* due to the impacts of climate change; this is a well-understood reality. Land-clearing, habitat loss, and invasive species are few of the multitude causes of the current ecosystem collapse in Central Australia. The proposed scope of land-clearing and substantial water extraction under the Singleton Project will only facilitate further environmental decline.

GDEs and Cultural Values

The level of community engagement that has occurred in relation to the Project is minimal. As a community member of Mparntwe, a space which neighbours the Singleton Pastoral Lease, I was not engaged about the impacts of this Project, nor were my peers. Beyond a notable absence of face-to-face consultation, what also concerns me is a lack of publicly available information on risks to groundwater dependent ecosystems (GDEs). Based on information produced by other organisations, the proposed level of drawdown will likely lead to significant impacts on GDEs both inside and outside of the Singleton Project area. These GDEs include, among others, bloodwoods, ghost gums, fig trees, soaks and creeks. Both aquatic GDEs and terrestrial GDEs, as well as surface expressions of groundwater, within the Singleton Water Licence Drawdown Area (SWLDA) are reported to be at

significant risk of degradation should Fortune Agribusiness be permitted to proceed with what is an unprecedented level of water extraction. Additionally, the potential impacts to vegetation and GDEs of salinisation of groundwater have not been adequately addressed. If, as is the current case, the proponents of the proposal are unable to fully understand the potential environmental impacts of the granting of the Singleton Licence, how can local communities and individuals affected by the Project be expected to have capacity to understand and assess information on the proposal?

These apparent risks should alarm the EPA Board and thus trigger the most rigorous level (Tier 3) of environmental impact assessment. Moreover, First Nations cultural values which are tightly bound up with the GDEs in the SWLDA, are at significant risk of decline, should the Project proceed.

Per the recent anthropological advice of Susan Dale Donaldson, four local estate groups: Akwerlpe-Waake, Iliyarne, Anerre and Arlpwe, have rights and responsibilities to the SWLDA in line with traditional laws and custom. These, in turn, give rise to cultural values which are highly significant to the lives of those landholding groups. The GDEs within the SWLDA represent sacred sites to the four abovementioned First Nations estate groups. It is reported that the Singleton horticultural proposal threatens up to 40 sacred sites within the SWLDA. From this, it is not unreasonable to conclude that First Nations cultural values are at severe risk of harm. Again, this projected reality under the Singleton Project should cause deep concern to the EPA Board.

I respectfully request that you ensure that the most rigorous level of environmental impact assessment (Tier 3) is applied.

Thank you for taking the time to consider this letter. I look forward to your response.

Yours sincerely