

Dr. Paul Vogel
Chairperson
Northern Territory Environment Protection Authority (NTEPA)
GPO Box 3675
Darwin NT 0801

12 February 2023

Dear Dr. Vogel,

As a resident of Central Australia, I write to express my deep concern about the **significant impact** that the Singleton Horticultural Project will have on the environment and urge the NTEPA to undertake a **Tier 3 Assessment**.

Living and working in Central Australia, I am acutely aware of the importance of protecting our water resources and, unsurprisingly, deeply concerned about the scale of this project. As the Board is well aware, it is the largest groundwater licence granted in the Northern Territory. I suggest that on this basis alone, it should be subject to the highest level of public and scientific scrutiny.

There is a high risk that the impacts of the project will be severe and extensive. This includes the potential for **significant and irreversible impacts on Groundwater Dependent Ecosystems**. When visiting the area, I am in awe of its natural beauty and hold deep fear for the ghost gums, bloodwoods and coolabahs that are likely to be threatened by the project. I can only imagine the impact this will have on the spiritual and cultural lives of traditional owners in the region, and commend to the Board the [addendum report](#) by Dr. Susan Donaldson to the *Aboriginal Cultural Values Impact Assessment in the Singleton Water Licence Drawdown Area*. In this addendum report, Dr Donaldson has concluded the “potential impacts [of the project] will likely or almost certainly result in highly significant cultural values to be lost, degraded and damaged, as well as notably altered, modified, obscured or diminished”. A Tier 3 assessment would ensure that this information is taken into proper consideration by the EPA in determining the impacts of the project.

Further potential impacts that have either not been properly considered or remain too uncertain include the salinity impacts, and impacts on threatened species. The paucity of information regarding our groundwater resources in the Northern Territory, means that data that should be necessary to provide key parameters for the assessment of project’s environmental impacts is either poor or not available. This suggests there should be **low confidence** in the information that has been presented by Fortune Agribusiness. It is therefore concerning and difficult to understand how the proponent has classified every residual risk rating as ‘low’ or ‘medium’.

The **extent of community engagement** has not matched the scale of the project. For a project of this scale and potential impacts, you would expect far greater public consultation across the region to have taken place. In its referral document, Fortune as failed to provide a detail account of the feedback received from the consultations that have taken place. A further concern is the quality of information provided to stakeholders. Fortune has been touting the potential social benefits of the project, in terms of jobs and local economic activity, but based on [independent economic analysis](#), these appear to have been significantly overstated.

The consequences of this project going ahead will be generational. I urge the Board to give this proposal the serious and detailed consideration that is required. Thank you for considering my submission.

Your sincerely