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7 February 2023

Dr Paul Vogel
Chairman
Northern Territory Environment Protection Authority
GPO Box 3675
Darwin NT 0801

By email only: eia.consult@nt.gov.au

Dear Mr Vogel,

Singleton Station – Fortune Agribusiness – Tier 3 Assessment Required

I am an Alice Springs resident and place great importance on the protection of the environment and Aboriginal cultural values. For that reason, I am extremely concerned about Fortune's proposal for Singleton Station.

In sum, there is too much risk and uncertainty associated with this proposal. Put simply, neither the science nor NT residents, like myself, can support it on the current evidence that has been given by Fortune. Fortune's proposal should be tested at the highest level, being a Tier 3 environmental impact assessment.

1. Proposal not backed by science

Fortune's proposal presents incredible risks to land and water on and around Singleton Station. Fortune has not adequately explained how these risks will be mitigated.

1.1. Land

Large areas of terrestrial habitat within the groundwater drawdown area (which is greater than 40km in diameter) depend on groundwater to maintain biodiversity and environmental functioning. In that light, it is unacceptable that Fortune does not consider the destruction of up to 30% of groundwater dependent ecosystems (GDEs) on Singleton Station to be an environmental risk. This is despite the fact that

Fortune itself recognizes the importance of GDEs for the environment, not just within Singleton but also for surrounding areas.

Fortune's assessment was based on a DEPWS guideline which has not been open to public consultation and contradicted the Western Davenports Water Allocation Plan. As a member of the public, the conflicting standards fail to provide clarity as to whether Fortune's application is even lawful, let alone environmentally sound.

I am also very concerned about the lack of research regarding threatened animals on and near Singleton. I understand that the most recent assessment of threatened species on Singleton took place after a long period of drought. As there has been more rain in the last few years the situation is likely to have changed. This alone merits further on-site research before the potential impact can properly be known.

1.2. Water

As one of Australia's largest water licences, Fortune's proposal will require an obscene amount of water. It is extremely difficult to conceptualise what 40,000 megalitres actually represents. As a result, Fortune predicts that the water table would be lowered by up to 50 metres. This would surely be destructive for GDEs and other flora in the area which depend on the height of the water table as it currently stands.

Additionally, neither Fortune nor the NT Government seem to know how often groundwater recharge in this area occurs. There have only been a handful of significant recharge events in the last century. In the context of climate change and the critical importance of water in the future, it is simply irresponsible to grant a licence of this volume without knowing more about the water that Fortune will require for its project.

My concerns are backed by scientists. For example, Cooke and Keane assessed the impacts of salinity to the area in their report, "The Risk of Salinity due to Irrigation Developments in the Western Davenport Basin, Northern Territory." They say that Singleton Station and the surrounding area is at 'high risk' of increased salinity after 30 years of groundwater extraction. According to Cooke and Keane, Fortune's proposal will have "very significant implications for long-term viability of irrigated horticulture." Fortune did not address these findings in its referral to the NT EPA. This is extremely worrying for me.

2. Lack of public and native title holder support for the proposal

Fortune's proposal does not offer many substantial benefits for the region nor the wider NT. The public has recognized this, with 23,355 people having signed a petition in favour of the NT Water Controller refusing Fortune's licence application.

The public have also heard the voices of the native title holders for Singleton, who are strongly opposed to the project. I saw this first hand at the Supreme Court in Alice Springs during the court case. The concerns of native title holders are unsurprising given Donaldson's cultural values report, which clearly indicates that extreme damage to an unacceptable number of culturally significant sites (an estimated 40 GDEs within the drawdown area) is effectively unavoidable if Fortune's proposal goes ahead.

If the NT Government really wants to work with its Aboriginal constituents (as it repeatedly says it does), then Fortune's proposal must be given the highest level of scrutiny. This can be achieved only by a Tier 3 environmental impact assessment.

3. Tier 3 environmental impact assessment is required

Overall, to accept a licence of this scale without Tier 3 assessment would set an extremely worrying precedent for the future. That is on both the scientific and cultural grounds set out above.

Please reach out if you would like to discuss the contents of this submission.

Yours faithfully,

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