

Northern Territory Environment
Protection Authority
GPO Box 3675
Darwin NT 0801

12 February 2023

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

Dear Northern Territory Environmental Protection Agency

I am a resident of Mparntwe/Alice Springs. I value arid land environmental resilience and conservation, and valuing and respecting the traditional custodians of the lands of Central Australia.

I am deeply concerned that the Singleton Station horticulture proposal poses a significant and unacceptable impact to the environment and cultural sacred sites in the area.

General concerns

I have serious concerns generally regarding the proposed water extraction at Singelton Station, including:

- Extraction of this amount of water is both unparalleled and unsustainable. The proposed 40GL/year extraction is far larger than anything previously extract in the Northern Territory and perhaps Australia.
- The minimal public consultation relating to groundwater dependant ecosystems (GDEs) during the assessment and granting of the water license. In short, it seems there was very little meaningful consultation by the NT Government or Fortune. It also seems that the reason for this is because there has been very little assessment of the potentially devastating effects this project could have on the surrounding environment.
- Arid environments across Australia are already undergoing ecosystem collapse from the impacts of climate change, such as changes to temperature and precipitation, and regional factors such as land clearing and habitat loss, invasive species and impacts from agriculture and industry, including water extraction. The substantial groundwater extraction associated with this Project, as well as the land clearing it requires, will further threaten these at-risk ecosystems.

Specific concerns

I also have more specific concerns regarding Fortune's proposed operations. This includes:

- Risk assessment – it is concerning that Fortune has classified every residual risk rating as 'low' or 'medium'. There are zero residual risks that have been classified as 'high' or 'extreme'. This appears to show either negligence on the part of Fortune as to the potential environmental risks, or a clear disregard for those risks. This

development is defined by significant risk and uncertainty. Whether it is related to salinity, cultural values, groundwater dependent ecosystems, the groundwater resource or many others, there is outstanding uncertainty and significant risk.

- Impacts on land – Fortune does not consider the destruction of 30% of GDEs to be an environmental based on a DEPWS guideline, which has not been open to public consultation and was in conflict with the relevant water allocation plan. I believe this shows disregard for environmental impacts of the project and therefore requires the highest level of scrutiny from the NT EPA.
- Impacts on local flora and fauna – it is unacceptable that Fortune has not undertaken any fieldwork to investigate the occurrence and potential impact on threatened flora and fauna. As noted above, ecosystems around Australia are suffering collapse and it is unacceptable that a project such as this could go ahead without even investigating the presence of threatened species.
- Impacts on water – Fortune’s modelling suggests that the water table could be reduced by up to 50 metres in parts of the aquifer, threatening GDEs and sacred sites.
- Impacts on community and culture – this project does not offer a great benefit for the region. The report estimates only 26-36 full time equivalent jobs will likely be filled by residents of the NT of which only 5-8 full-time equivalent jobs are expected to be from Aboriginal communities in the Barkly region. The proposal threatens up to 40 sacred sites, within its drawdown area. I find it deeply concerning that a project with very little potential economic benefit to the community is being considered in light of the significant potential environmental, cultural and social costs.

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.

Kind regards

Shaun Rich
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