

17 February 2023

E brett.easton@nt.gov.au

Ms Kylie Fitzpatrick
Manager Environmental Assessment
Department of Environment, Parks and Water Security
GPO Box 3675
DARWIN NT 0801

T 08 8999 5190

File reference
36:DITT2022/00015~0016

Via email: eia.ntepa@nt.gov.au

Dear Ms Fitzpatrick

Re: Invite to comment – Fortune Agribusiness Funds Management Pty Ltd – Singleton Horticulture Project

Thank you for the opportunity to comment on the Fortune Agribusiness Funds Management Pty Ltd – Singleton Horticulture Project.

Comments are provided at Attachment A.

If you require any further information please contact Mairi Walsh, Manager Resource Regulatory Reform at StrategyPolicyCoordination.DITT@nt.gov.au or on 8999 7020.

Yours sincerely



BRETT EASTON
Director, Resource Policy and Reform

Submission on the referral

Fortune Agribusiness Funds Management Pty Ltd – Singleton Horticulture Project

This submission is made under regulation 53 of the Environment Protection Regulations 2020

Government authority: Department of Industry, Tourism and Trade

Summary Advice: The project proposal is strongly supported due to;

- The adoption of a measured and staged implementation to ensure minimal impacts to the environment
- The significant boost it will potentially bring to the regional economy through jobs and business opportunities, and
- Significant regional and national food security outcomes

The following divisions within DITT have responded with the following advice:

- Mineral Titles advise there are no mineral titles over this area.
- Petroleum Titles have advised that reserved block (RB)205 and RB207 are located within parts of Singleton Station. A reserved block prevents the exploration, or production of petroleum energy within the area. There are no geothermal interests. The following petroleum titles are also located over Singleton Station.

Title	Title Holder/s	Contact Details
Exploration Permit (EP)129 (<i>Application</i>)	Merlin Energy Pty Ltd (100%) Central Petroleum Limited (Manager)	Central Petroleum Limited Titles Titles@centralpetroleum.com.au
Exploration Permit (EP)263 (<i>Application</i>)	Territory Gas Aust Pty Ltd (100%) Australian Mining & Exploration Titles Services Pty Ltd (Manager)	Tenement Officer Danielle Alchin danielle@amets.com.au
Pipeline Licence (PL)4	APT Pipelines (NT) Pty Limited (100%)	Katrina Hughes Office Manager Katrina.hughes@apa.com.au plmcontactus@apa.com.au

- Agriculture specific advice

Section of Referral	Theme or issue	Comment
Various Appendices	Groundwater, groundwater dependent ecosystems, sacred sites, habitat	• Comprehensive analyses of risks and mitigations are addressed in detail through appendices, and/or through regulatory processes: ○ Groundwater extraction and monitoring – Appendix E and Appendix G ○ Groundwater dependent ecosystems – Appendix M and Appendix R ○ Sacred sites – AAPA Certificate process; Appendix O and Appendix P ○ Climate change (Appendix W) ○ Stygofauna (Appendix N) ○ Threatened species (Appendix C)
Referral main document / Appendix E Groundwater Extraction allocation	3.5.7	• Rainfall on and proximal to Singleton is expected to recharge aquifers well in excess of the maximum extraction licence. Aquifer extraction and recharge will often be simultaneous • Based on historical rainfall calculations, there are no concerns related to water usage for agricultural purposes. • The water licence is conditional and staged, with the maximum drawdown not accessible without criteria being met, and not required without sufficient horticultural demand (based on plant maturity). The licence criteria include detailed monitoring to check for any potential impacts on Groundwater Dependent Ecosystems (GDEs) thereby providing for their protection.
Referral main document	10. References	• In-text reference to Duguid, 2009; GHD 2020 (page 103) is not included in the list of references
Appendix C Biodiversity Assessment Report	Appendix A Biodiversity Management Plan	• Regarding the residual risk of invasive and feral animal species, <i>the Pastoral Land Act 1992</i> provides that the Pastoral Land Board must monitor the numbers and effect of feral animals (s 29(g)), and may direct a lessee to control feral animals (s 73). There are sufficient controls in place in the referral to minimise and mitigate any risks
Appendix D Crop trials and market analysis	Crop attractiveness assessment, Table 3 – Hay (fodder)	• The NT hay annual market is currently around 80,000 tonnes. Any additional annual hay production which pushes the total over 80,000 tonnes may need to be stored locally or additional markets sourced either interstate and / or overseas, if it cannot be used on Singleton Station.

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Appendix O	AAPA certificate AAPA certificate, Para 3	- The AAPA certificate had an expiry date of 2 October 2021 if works and proposed use had not commenced within 24 months of its receipt. There have been many interruptions to Fortune's plans, do any of them (including the judicial review) constitute a suspension and/or extension of the 24 month period, or will Fortune require a new AAPA certificate? - The AAPA certificate refers to Fortune being required to monitor trees inside the rail corridor. The rail corridor is a minimum 1,200 metres from the nearest bore. Furthermore, the rail corridor that bisects Singleton is a separate parcel of land (Crown Lease 1901) and is the responsibility of AustralAsia Railway Corporation, sub-leased to GWA (North) Pty Ltd.
Appendix S Baseline flood assessment / Referral main document	3.4 Flood effects on crops (page 18) / Figure 3.5.6 Cropping schedule	- In relation to the statement '<i>annual crops such as hay, onions and rockmelons are not planned to be grown during the wet season when flooding events are more likely</i>', early planting of rockmelons which can be in February and March have some potential to be impacted by flooding. Figure 3.5.6 does not list the annual hay crops, so it is hard to say with any certainty if they would be affected. - It could also be noted that surface flooding outside of drainage channels and other wetlands is not an annual event. Whilst flood risks are higher in the summer months, the climate of Singleton is generally classified as semi-arid with a cool dry winter and a hot wetter summer. The term 'wet season' is not generally used.
Appendix J Economic Impact Assessment	Economic benefits	- The economic and regional benefits of the Fortune development are expected to be significant. - As outlined in the Assessment, the project is expected to result in a substantial increase to the agricultural output of the Barkly and Central Australian regions, with broader economic benefits through the Northern Territory economy and nationally, including value-add and employment benefits and will significantly diversify and expand the local economy. - From an agricultural perspective, production from the Singleton Farm (once fully developed) is projected to increase fruit and vegetable production by around \$200 million, increasing horticultural production in the Northern Territory by more than 50% per annum, contributing substantially to the Northern Territory economy.
Appendix J Economic Impact Assessment	Staged development	- Through development of the project and in response to stakeholder feedback, the Singleton Farm project appears to have adapted much of the original design and development parameters to help mitigate potential impacts. The Department of Industry, Tourism and Trade has been working with the project to help ensure regulatory approval processes are followed and the interests of Territorians are protected. - The project is currently proposed to be developed in four stages over 9 years, with construction for stage one proposed to commence in mid-2023 and full operation proposed to be reached in 2036 (approximate)

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		• The staged development of the Singleton Farm as outlined in the Assessment appears to represent an optimised development pathway that will <i>'support careful growth of the farm, community facilities and infrastructure.'</i> This also seems to take into account <i>'a sensible rate of workforce development, skills sharing and enhancement, lessons gained in progressive stages and continuous improvement minimising impact.'</i> • Staging also represents sensible economics for the proposed development and will help underpin a resilient and robust horticulture industry in the Region.
Appendix J Economic Impact Assessment	Project scale	• The establishment of the Singleton Farm is a game changer for the Barkly region and Central Australia. • The Economic Impact Assessment describes the project as <i>'very much a 'pioneer investment' or 'economic catalyst' that will see the development of a major new industry for the Barkly Region'.</i> • Projects at the scale of Singleton, although not without risk, have the potential to shift the dial immensely at a regional level (including, social and economic benefits) as well as contribute enormously to regional and national food security. • The Assessment outlines the key benefits of this scale of regional development, including: – <i>underpin training and employment programs for the local community, in particular skills enhancement of local indigenous people</i> – <i>build sustainable fruit and vegetable supply chains presenting commercial opportunity for additional parties to invest; and</i> – <i>establish proven routes-to-market for the farm's output, reducing risk and presenting investment opportunity for other projects to establish in the region.</i>