

Northern Territory Environment
Protection Authority
GPO Box 3675
Darwin NT 0801

Annie Girdwood
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0870 NT

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Dear EPA,

I am writing to you as a concerned citizen of Mparntwe, Alice Springs following the advice of custodians here. I am seriously alarmed and concerned that the Singleton horticulture proposal represents an unacceptable impact on the environment. The proposal poses risk of serious or irreversible environmental harm including to groundwater dependent ecosystems, salinity, sacred sites and habitats for threatened species.

It is well described that arid and semi-arid environments in 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.

The public was not effectively consulted about the impacts on groundwater dependent ecosystems during the assessment of the groundwater extraction license process. Minimal information was publicly available on the risks to GDEs. The NT Water Act 1992 does not provide the same level of public involvement as the NTEPA Act, resulting in the views of the 23,355 people who petitioned the Controller to refuse the license, not even being acknowledged in the Controller's Notice of Decision.

It is unacceptable that the proponent has classified every residual risk rating as 'low' or 'medium'. There are zero residual risks that have been classified as 'high' or 'extreme'. There are significant and intense risks to diverse ecological, hydrological and cultural values over a period of many decades. This is unsurprising as this project is one of the largest fruit and vegetable developments in Australia and requires one of the nation's largest water licences.

Large areas of terrestrial habitat within the groundwater drawdown area (which is greater than 40km in diameter) depend on groundwater to maintain biodiversity, ecological integrity and ecological functioning. It is unacceptable that the proponent does not consider the destruction of up to 30% of GDEs on Singleton Station to be an environmental risk, based on a DEPWS guideline, which has not been open to public consultation and was in conflict with the relevant water allocation plan. This is a non-statutory guideline which is not enforceable and should not dictate what constitutes a significant impact.

It is unacceptable that the proponent has not undertaken any meaningful fieldwork to

comprehensively visit the GDEs occurring within the impacted area or identify threatened flora. This is despite acknowledging that GDEs are known for their ability to support higher biodiversity and productivity than surrounding landscapes and may be an important underpinning of persistence of resident flora and fauna species. The loss of large trees such as ghost gums which are associated with GDEs would be expected to reduce habitat for threatened species, including the grey falcon. Additionally, the potential impacts to vegetation and GDEs of salinisation of groundwater have not been adequately addressed.

Fortune's modelling indicates that the water table would be lowered by up to 50 metres in parts of the aquifer. The Project is located in the Arid Zone of the NT, and specifically within the Western Davenport Water Control District. Groundwater recharge in the Western Davenport region is "highly episodic" and "rare, peak rainfall years contribute disproportionately to groundwater recharge while in an annual year, minimal, if any, groundwater recharge occurs". There have only been three significant recharge events in the last 100 years. It is simply irresponsible to grant a license of this volume in these circumstances.

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." The authors conclude Singleton Station and the surrounding area is at 'high risk' of increased salinity after 30 years of groundwater extraction which will have "very significant implications for long-term viability of irrigated horticulture." Key findings in this report were ignored by the proponent in their referral to the NT EPA.

Clearing the land for horticulture and destruction of GDEs would be expected to result in atmospheric emissions but these have not been calculated and considered as an environmental risk. As these risks are avoidable, they should not be offset.

To counter this enormous amount of potential harm, the report does not offer any great benefit for the region. It 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. Instead, the proposal threatens up to 40 sacred sites within its drawdown area, contributing to the ongoing desecration of Aboriginal land.

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,

Annie Girdwood