

13 February 2023

Dear Dr Vogel,

Calling for a Tier-Three Assessment of the Singleton Station Horticulture Project

I am a resident of Alice Springs/Mparntwe. I have lived here for three years. Three years may not be a long time, but Alice Springs feels like my home. As a result, I am personally invested in maintaining (and increasing) the amenities and quality of life for myself and other residents of the communities within Central Australia.

Given the fragility of Central Australia's environment - the aridity of the ecosystem, the absence of meaningful regulatory oversight,¹ and the already visible repercussions of climate change - I was dismayed to see that the Northern Territory Government approved the horticultural proposal of Fortune Agribusiness Funds Management Pty Ltd (**Fortune**) to develop an intensive irrigated agriculture project at Singleton Station (**the Project**).

The breadth and depth of the environmental risks that are present in the Project are such that the highest level of scrutiny must be applied by the Northern Territory Environment Protection Authority (**EPA**) in assessing the viability and prudence of this proposed action.

The balance of this submission addresses the EPA's mandatory considerations in deciding which method of assessment should be applied to the Proposal, as dictated by Regulation 59 of the Environment Protection Regulations 2020 (NT).

(1) The significance of the potential impact of the Project

Put simply, the Project is unprecedented. The Singleton Station groundwater licence presently authorises the extraction of 40,000 ML/year, or 40GL/year, from 144 bores. It is the largest groundwater licence granted in the Northern Territory by a margin of some 24.6 GL. In comparison, the 10 largest groundwater licences in NSW range from approximately 7GL to 15GL.

¹ See, for example, <https://www.abc.net.au/news/2023-02-03/criticisms-mount-over-unregulated-land-clearing-in-the-nt/101897606>.

A groundwater extraction licence of this magnitude in such a fragile and arid ecosystem is - without considering any of the other r 59 criteria - independently sufficient to demand a tier-three assessment. Without this level of scrutiny, the extent of the risks associated with a 50m lowering of the groundwater table over a minimum of 30 years would go impermissibly unexamined.

The Project spans an area of 3,300 ha, but the drawdown radius of the groundwater extraction is 25km. Inside this 25km radius is an enormous amount of groundwater dependent ecosystems, such as bloodwoods, ghost gums, bean trees, coolabah trees, fig trees, river red gums and bush oranges, as well soakages and creeks. All of these groundwater dependent ecosystems will undoubtedly be damaged, and most will probably be destroyed. This process will be irreversible. The replenishment of the groundwater is, to my knowledge, impossible (given the natural aridity of the environment and the inability of rainfall to recharge the groundwater levels). Salinity levels will increase.² Sacred sites of the Kaytetye people will be ruined as a result.

The potential impacts of the Project are unambiguously significant. They demand to be assessed under highest level of scrutiny available.

(2) The level of confidence in predicting the potential impacts of the Project, taking into account the extent and currency of existing knowledge

You will probably have access to a large number of submissions that provide valuable scientific opinion on the accuracy of the environmental risk assessments done by Fortune. I am a layperson. I cannot provide that insight.

Leaving that aside, I cannot understand how Fortune has classified every residual risk rating as 'low' or 'medium'. There are zero residual risks that have been classified as 'high' or 'extreme'. How is this possible, given the Project is the largest groundwater extraction licence ever granted in the Northern Territory in an environment that is exclusively arid or semi-arid? Self-assessment of the risks in the Project as 'low' or 'medium' must mean one of two things: either limited confidence can be placed in the assessments of risk that have been undertaken, or the risk assessments are incorrect.

(3) The level of confidence in the effectiveness of Fortune's proposed measures to avoid, mitigate or manage the potential significant impacts of the Project

I have read that Fortune is proposing to rely on "adaptive management" as a means to mitigating the risks that are in view were this Project to proceed. Again, as a layperson, I am unable to give useful commentary on the validity of adaptive management's application to specific risks.

However, as a matter of logic, how can it be said that adaptive management can overcome the environmental impacts that will materialise should the Project proceed? A 50m reduction in the groundwater table is going to occur. This is a certainty. Unless adaptive management

² Cooke and Keane (2021) "The Risk of Salinity due to Irrigation Developments in the Western Davenport Basin, Northern Territory" at 67.

provides a means of resolving this - which, to my knowledge, it doesn't - how can the public have confidence in the effectiveness of this Project to avoid significant destruction to the environment?

(4) The extent of community engagement that has occurred in relation to the Project

Unfortunately, it would seem that the extent of community engagement that Fortune has undertaken is limited. I am writing from Alice Springs, so I cannot speak for the communities that are more local to the Project (i.e. Ali Curung and Tennant Creek). However, from my vantage point, Fortune has done nothing to engage with the concerns of the people of Central Australia. I recall hearing that they conducted one community consultation in Tennant Creek. That is patently insufficient for a project of this size and scope.

That does not mean that community engagement has been non-existent. The work of advocacy groups, statutory bodies (such as the Central Land Council) and local media has emboldened people to engage with the environmental, economic, and social merits of the Project. But I do not think that, to date, this engagement has been sufficient.

Only a tier-three assessment would go some way to resolving this. Allowing the public to engage with and make comment on the terms of reference, an environmental impact statement and a supplementary environmental impact statement would ensure that the Project is given the scrutiny it deserves.

(5) The capacity of communities and individuals likely to be affected by the Project to assess and understand information about the Project and its potential significant impacts.

Given the absence of genuine community engagement thus far, a tier-three assessment would be necessary to ensure that the public is given the fullest opportunity to understand the Project. This is especially true for a community like Ali Curung (and for the people who reside in the nearby outstation of Imangara/Murray Downs). The individuals in these communities require more prolonged communication campaigns. At times, I struggle to understand the statutory approval process for the Project and the density of the literature on the Project's environmental risks. Almost all the members in the directly affected communities speak Warlpiri, Alyawarre, Kaytetye and/or Warumungu before they do English. It is imperative that these individuals are given the best chance possible to assess and understand the environmental impacts that will occur should the Project proceed, and the opportunity to be heard as to those impacts.

Given the above, I encourage you to apply a tier-three assessment of the Project.

Yours sincerely