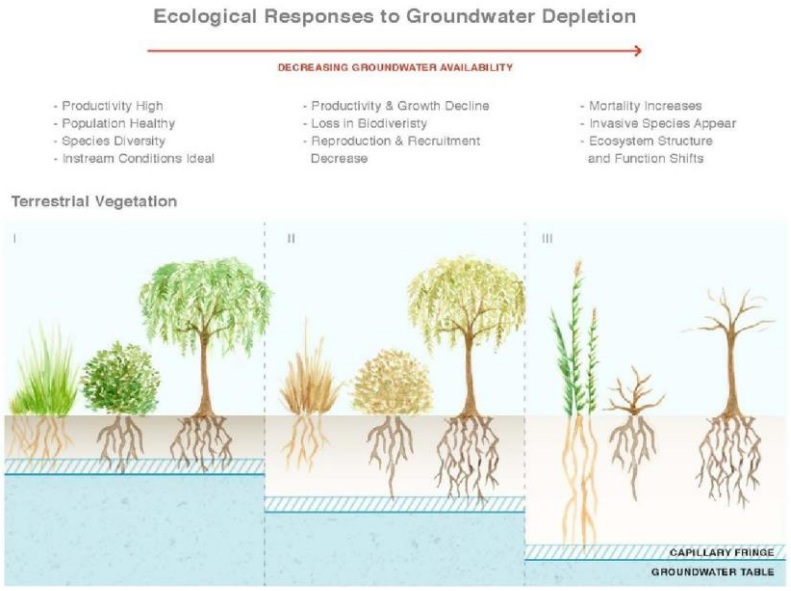
Singleton Terms of Reference ALEC position and submission guide

The Terms of Reference (ToR) for Singleton's Environment Impact Statement (EIS) details information required by the Northern Territory Environment Protect Authority (NT EPA) to assess Fortune Agribusiness' development. The *Environment Protection Act* 2019, states that the NT EPA must apply principles of ecologically sustainable development. Below are ALEC priorities for the ToR submission.

Must protect groundwater dependent trees, soaks, springs and swamps

This development threatens to damage and destroy a 50km stretch of groundwater dependent ecosystems, which includes 40 sacred sites.

Groundwater dependent trees, soaks, springs and swamps are the lifeblood of the arid zone. This is non-negotiable. They provide complex habitat, and act as refugia in a landscape that is scarce in surface water. In a changing climate groundwater dependent ecosystems will play an increasingly vital role in supporting the ecosystem function of arid and semi-arid landscapes. These sites support a diversity of life, from nesting trees and hollows for birds and owls, to food sources for native bees and other insects, to foraging sites and habitat for reptiles and mammals. These sites often also carry significant cultural values (Donaldson 2022)



(Image above In Rohde et al., 2017).

NT EPA must not adopt the NT Gov GDV Guideline that allows the 30% destruction of groundwater dependent trees

The Northern Territory Government's *Guideline: Limits of acceptable change to groundwater dependent vegetation in the Western Davenport Water Control District* (the Guideline) and its rule to destroy 30% of groundwater dependent vegetation has no scientific basis. There is no academic literature that has been reference that is focused on groundwater dependent and the semi-arid zone. It is a catastrophic departure from applying the principles of ecologically sustainable development.

The EPA must make decisions based on evidence, and not adopt industry-led policy development like the NT Gov GDV Guideline.

A groundwater dependent ghost gum (*Corymbia aparrerinja*) 4km from the proposed borefield which will be damaged and destroyed by the proposed development.

Further flora and fauna surveys must be conducted

The only flora and fauna surveys were conducted in 2019, which had the highest daily maximum temperatures in NT history, was during a period of multi-year drought and 2019 had the lowest rainfall on record in the Barkly. Conducting surveys during the most extreme heat period on record cannot capture representative data to inform a baseline.

The NT Government in reporting of the Biodiversity Assessment for that region acknowledges this:

"The region experienced well below average rainfall for several years prior to our survey, with drought conditions evident in the study area during field surveys. Further to the poor weather conditions, much of the study area is under intense cattle use with cattle impacts most evident where there was a shallow depth to groundwater. The environmental conditions, in concert with cattle impacts, are likely to have influenced our survey findings and adds some uncertainty regarding what flora and fauna may be supported during 'normal' or wet periods, and with respect to identifying areas with high biodiversity value in the study area"

Further fauna and flora surveys must be conducted to improve what constitutes a baseline for this region. One survey sample conducted during extreme weather events does not constitute ecologically sustainable development, nor does it reflect the application of the precautionary principle, the principle of evidence-based decision making and the principle of conservation of biological diversity and ecological integrity.

Threatened species must be protected

Threatened species are not mentioned once in the ToR. This is grey falcon (falco hypoleucos) habitat. The destruction of 50kms of its habitat may have a significant environmental impact on this species. Major uncertainty exists around the presence and absence of threatened species due to the deficient biodiversity baseline assessments. Further, flora and fauna surveys must be conducted to better understand the potential impacts on threatened species.

Affirm that the full impacts of salinity must be considered

This project at full production will bring approximately 40,000 tonnes of salts to the surface every year. As the *Risks of salinity due to irrigation developments in the Western Davenport Basin, Northern* Territory makes clear the region is at high-risk of salinity impacts and the 'predicted salinity increase has very significant implications for the long-term viability of irrigated agriculture'.

ALEC welcomes the proposed salinity assessment which will assess cumulative impacts of salts, salts in the leached irrigation water, incorporate field observations (including soil and groundwater salinity data) and that a rigorous solute transport model assessment will be conducted.

Frequently Asked Questions

What is Singleton irrigation development?

The Singleton Irrigation development is the largest groundwater licence in Australia and is located in the semi-arid zone in the NT, 350km north of Mparntwe Alice Springs, and 30km west of Ali Curung.

A 40,000 mega-litre (million-litre) licence that after 30 years, may use up to a trillion litres of water, twice the amount of all the water in Sydney Harbour. This project will require 144 bores. The project will lower the groundwater table by up to 50 metres, damage and destroy GDEs across a 50km stretch, threaten up to 40 sacred sites and bring up to 40,000 tonnes of salts to the surface every year at full production.

What is a shallow groundwater landscape?

Across large parts of this region is a shallow groundwater system. Shallow groundwater supports rich woodlands in landscapes that otherwise would not exist. Just a few metres below the surface is groundwater which trees like the ghost gums, coolibahs, bloodwoods and river red gums can access, as well as soaks, springs and swamps that are dependent on that water.

This shallow groundwater provides water to a landscape that is deficient in surface water. That is why groundwater is the lifeblood of these landscapes. They support the complex habitat for abundant and diverse ecosystems to exist. In a landscape that is already degraded, GDEs must be protected.

What is an Environment Impact Statement?

Fortune Agribusiness is required to gain environmental approvals. In March 2023, the NT EPA stated that the highest level of scrutiny is required to assess the Singleton development, that is a Tier 3 Environment Impact Statement. An EIS allows the NT EPA to analyse the significant potential environmental impacts of a development proposal, and make recommendations to the Minister about the acceptability, or otherwise, of those potential environmental impacts

What does the Terms of Reference do?

The Terms of Reference (ToR) for Singleton's Environment Impact Statement (EIS) details the information required by the NT EPA to assess Fortune Agribusiness' development.

When are submissions due and how do I submit?

11.59pm, Wednesday, 13 September 2023

Submit your comments through the NT EPA website, see link here.

What does the Environment Protection Act 2019 say?

The objects of the *Environment Protection Act* 2019 are clear. They state that the objects of the Act are to 'protect the environment of the Territory' and 'promote ecologically sustainable development so that the wellbeing of the people of the Territory is maintained or improved without adverse impact on the environment of the Territory'.

A decision maker *must* apply the principles of ecologically sustainable development

Other principles to be applied include the precautionary principle, the principle of evidence-based decision-making, the intergenerational and intragerational equity, the principles of sustainable use, and the principle of conservation of biological diversity and ecological integrity.