Joanne Townsend
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Jacqueline Arnold
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30 May, 2021

To Joanne Townsend,

I was born, raised and reside in Alice Springs and live and work in areas where, despite arid conditions, ecosystems thrive due to shallow groundwater.

I wish to register my interest in the advertised *Notice of intention to make a decision on Australian Green Properties Pty Ltd on NT Portion 2286 (Murray Downs Station) for 3,050 ML/yr*. My concerns relate to:

1. the need to protect all groundwater dependent ecosystems in this place, and;
2. ensuring that water is available for extraction for the benefit of local Aboriginal people by ensuring the Strategic Aboriginal Water Reserve is still accessible.

I expand on my concerns below.

1. Groundwater dependent ecosystems

I am concerned that much of Murray Downs station is shown as being in a "groundwater dependent ecosystem protection area" in the Western Davenport Water Allocation Plan (WDWAP) (page 45), including the proposed irrigation site (page 15 of the application). Page 42 of the WDWAP describes special conditions that apply to the taking of groundwater to protect groundwater dependent ecosystems in this area. These conditions apply to protect ALL groundwater dependent ecosystems.

The rules on page 42 of the WDWAP on limits to change in groundwater levels within the GDE protection area should be applied in full to protect ALL groundwater dependent ecosystems on Murray Downs station.

I am concerned that the subsequent and contradictory GDE guideline (which allows the destruction of 30% of all types of groundwater dependent ecosystems in the area) may be applied to the assessment of this application. This guideline was used to assess the nearby Fortune Agribusiness Funds Management Pty Ltd (FAFM) groundwater extraction licence application. I, and many others, continue to oppose this.

I understand the FAFM proposal is yet to undergo a rigorous environmental impact assessment that will finally decide whether the impacts are acceptable.

As this application is smaller, I understand it may not be subject to the same standard of environmental impact assessment, and so there may be no recourse to rescind this extraction licence decision. **Therefore if this guideline is to be applied to this application, no decision should be made until the outcome of the FAFM environmental impact assessment has been decided.**

I believe my concerns about the need to fully protect all groundwater dependent ecosystems reflect community sentiment. This was clearly communicated to you through the *Letters for the Environment Central Australia* petition which I administered. It opposed the FAFM extraction licence largely on basis of its impacts on GDEs. As you know, over 23,000 people added their names to the petition.

Strategic Aboriginal Water Reserve (SAWR)
The FAFM Notice of Decision (page 120) states that the FAFM proposal will damage/extinguish 22% of alluvial and 18% of sandplain GDEs by taking 40 000 ML/year after only thirty years of pumping. This clearly shows the amount of water allocated for extraction in the WDWAP is too high and can be expected to be revised downwards.

Local Aboriginal people deserve a share in the groundwater resource, but it is rapidly being given to station owners before they get a look in. This risk of water entitlements not being available to Aboriginal landowners under the SAWR due to a reduction in the estimated sustainable yield is described as "extreme" on page 58 of the Western Davenport plan. I propose that ***all remaining water should be set aside for use under the Strategic Aboriginal Water Reserve while there is any doubt about how much water is actually available.***

Summary

1. ***The rules on page 42 of the WDWAP on limits to change in groundwater levels within the GDE protection area should be applied in full to protect ALL groundwater dependent ecosystems on Murray Downs station.***

2. ***If the GDE guideline (which I oppose) is to be applied this application then no decision should be made until the outcome of the FAFM environmental impact assessment is known.***

3. ***All remaining water allocated for extraction should be set aside for use under the Strategic Aboriginal Water Reserve while there is any doubt about how much water is actually available.***

Thank you for taking the time to consider my submission.

Yours Sincerely,

Jacqueline Arnold

References

GDE Guideline: https://denr.nt.gov.au/__data/assets/pdf_file/0006/904758/GDE-Guidance-document-Western-Davenport-2.pdf

Western Davenport water allocation plan:
https://denr.nt.gov.au/__data/assets/pdf_file/0011/624863/Western-Davenport-WAP-04012019.pdf