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10 December, 2022
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Ban Ban Springs Station, PPL1111 NTP 695, Darwin Pastoral District

The application is for 2,982 Ha of clearing on top of 511.9 ha already approved.

I am strongly opposed to this proposal on grounds of :

1. Impacts on threatened species and significant vegetation; including loss and fragmentation of essential habitat in the tropical savannah ecosystem.
2. Water balance changes and the potential for water contamination / pollution of wetlands and waterways including Margaret River
3. Failure to consider impacts on cultural heritage
4. Climate change and greenhouse gas emissions from the project and lack of offsets.
5. Inappropriate assessment process - Lack of assessment under the Environment Protection Act 2019.

Impacts on threatened species and significant vegetation; including loss and fragmentation of essential habitat in the tropical savannah ecosystem appear significant but are inadequately assessed.

The permit holder has not demonstrated the qualifications required to self-assess potential risk to protected matters and to self-refer where scientific uncertainty exists about the likelihood of a significant impact occurring or being likely to occur. The application states "There is no evidence to suggest that there are important biodiversity values nor important habitat for any listed species within or impacted by the proposed clearing." I contend this is inevitable as biodiversity surveys have not been undertaken. These must be completed before this application is resubmitted as the application details an enormous range of significant, vulnerable and threatened fauna on the station (described in following paragraph0.

The application draws on information from the Significant Fauna atlas which reveals an enormous range of significant, vulnerable and threatened fauna including: Buff-sided Robin, Bush Stone-curlew, Cattle Egret, Emu, Fawn Antechinus Ghost Bat, Glossy Ibis, Gouldian Finch, Great Egret, Hooded Parrot, Northern Brown Bandicoot, Northern Leaf-nosed Bat, Northern Purplespotted Gudgeon, Northern Ridge-tailed Monitor, Orange Leaf-nosed Bat, Pale Field-rat, Partridge Pigeon (eastern), Rainbow Bee-eater, Saltwater Crocodile, Star Finch, White-bellied Sea-Eagle, Yellow-rumped

Mannikin, Black-banded Fruit-Dove, Fork-tailed Swift, Common Blue-tongue. Northern Brush-tailed Phascogale, Northern Quoll, Black footed tree rat Nabarlek Bare rumped sheath tail Bat and the Yellow-spotted Monitor.

Yet , in response to the questions “Are there any important biodiversity values within proximity of the proposed clearing extent?” the applicant in section 8.7 states “yes Riparian communities are the only sensitive / significant vegetation communities located within the vicinity of the proposed clearing. The presence of intermittent creeks was validated in the field and riparian areas mapped. Buffers were applied to the riparian areas that meet and generally exceed the recommendations in the LCG”.

Based on the above species list, these significant species are not all confined to riparian areas. Without dedicated surveys their occurrence cannot be confirmed or otherwise.

Water balance changes and the potential for water contamination / pollution of wetlands and waterways including Margaret River

The application notes the significance of waterways and proposes buffers. I contend, regardless of buffers, risks to these areas from erosion and contamination with nutrients and sediments in runoff is heightened. There also does not seem to be any plan to fence these buffers.

Failure to consider cultural heritage

The application does not provide any details of any heritage or archaeological surveys conducted within the property and any findings relevant to the proposed clearing extent. This suggests none have occurred. This is fundamentally risky and offensive to local Traditional Owners. This negligence should not be facilitated through this land clearing assessment process.

Climate change and greenhouse gas emissions from the project and lack of offsets.

I'm opposed to this proposal on grounds of its fundamental non-compliance with the NTG offsets framework.

This makes clear offsets *cannot be used to make an unacceptable impact acceptable.*

It is impossible to make comment on:

- Loss of stored carbon because the proposal does not even mention the loss of carbon storage.
- GHG Emissions from planned fertiliser and stocking rates should also be included in emissions estimates.

Land clearing of this scale is fundamental stops the Territory from making deep cuts in emissions early. In very rough terms assuming 50 tonnes per hectare carbon storage in woodland to be cleared, this proposal could be releasing over 50,000 tonnes of carbon to the atmosphere. Whilst this is fundamentally unacceptable, this

application process appears to be allowing a market failure by not requiring the applicant to pay this cost.

Lack of assessment under the Environment Protection Act 2019.

While I'm firmly opposed to this proposal I believe if the applicants wish to proceed with an application, it should first be subject to environmental impact assessment under the *Environment Protection Act 2019* and the *Environment Protection and Biodiversity Conservation Act 1999* (Cwth).

The *Environment Protection Act 2019* places the responsibility on the proponent to refer the proposed action if it has the potential to have a significant impact on the environment or if it meets a referral trigger. As the applicant has not referred this application which details significant but poorly defined risks to the environment the Pastoral Lands Board should.

In summary I am opposed to this application being approved in its current form. The Application should:

(a) be rejected

(b) be referred for assessment under both the Environment Protection Act NT and EPBC Act.

Yours Sincerely,

Jacqueline Arnold