Jacqueline Arnold
PO Box 9124
Alice Springs
NT 0870

3 March, 2023

Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Pastoral Land Clearing Application – Bunda Station, Victoria River Pastoral District, Portion 3700, Pastoral Lease 1027

I am writing to request that you reject the application to clear 4,772,7 ha of native vegetation on Bunda Station for "pastoral purposes – non irrigated sorghum fodder.

I am strongly opposed to this proposal on grounds that this is an enormous proposal with severe impacts, exacerbated by its proximity to Maud Creek and downstream environmental receptors. These include:

A. Biodiversity impacts, specifically:

1. Risks to significant vertisols from the removal of golden beard grass and other native grasses; and introduction of tilling, without any strategic consideration of this risk
2. Destruction of significant vegetation – golden beard grass
3. Unavoidable and unacceptable risk to significant and threatened species associated with Maud Creek, Birrindudu wetland and other key wetlands and waterways in the Lake Gregory catchment.

I dispute the applicant's self-assessment that this proposal does not pose a risk to aquatic ecosystems, in particular "the health of the biota in inland waterways" (refer Attachment 13).

B. Impacts on wetlands listed on Maud Creek and downstream wetlands listed are not considered, despite these being identified in the Directory of Important Wetlands of Australia, (specifically Birrindudu waterhole and floodplain, which is also identified as a site of international conservation significance). The proposal clearly has impacts on biodiversity resulting from:

1. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle waste – 100kg/ha fertiliser is anticipated.
2. Use of herbicides and pesticides without any specific details of what will be used and there being no capacity to regulate this.
3. Introduction of environmental weeds - specifically sorghum which is proposed to be planted and there is significant evidence that these can persist as environmental weeds https://www.ogtr.gov.au/sites/default/files/files/2021-07/the_biology_of_sorghum.pdf vertisols – These regions are already heavily under pastoral lease (e.g. >97% on the Mitchell Grass Downs) under and consist of vertisols which are of national significance and whose formation is contingent on deep rooted grasses and cultural land management practices. They should not be exposed to risk form tilling

https://www.dcceew.gov.au/sites/default/files/documents/desert-geoheritage-v2.pdf .

C. Impacts on vertisols - the application does not demonstrate these soils can be preserved. An EIS is needed to evaluate the risk to these soils from tillage . This needs to be strategically assessed, before any more approvals are granted as the current ad hoc approvals are creating a "death by a thousand cuts" situation and reifying a precedent that has been established without the Pastoral Lands Board having provided any evidence that this is environmentally acceptable (not that environmental assessments are within its purview).

D. Climate change and greenhouse gas emissions from the project and lack of offsets. It is an absolute outrage that nearly 500,000 tonnes of carbon emissions are associated with the proposal and the costs associated with this being gifted to the applicant at the public and environment's expense. I firmly believe this is grounds for rejecting this proposal. These impacts warrant an EIS on basis there is a significant risk this proposal may be a large emitter. While I believe carbon emissions make the proposal fundamentally untenable, at a minimum I believe they must be offset at cost to the applicant.

E. The application does not describe any consultation with Traditional Owners about impacts on cultural values or archaeological surveys. These must occur prior to any evaluation of this application in order for it to be based on a meaningful information. It is clear that vertisols like this are associated with significant cultural values (refer page 38 of attached which highlights kangaroo, nail tail wallaby, bush turkey etc are valued in vertisols – these values and loss of these values are not recognised https://www.nlc.org.au/uploads/pdfs/NERP_Ganalanga-Mindibirrina_IPA-PoM.pdf)

No evidence of this consultation having occurred is presented.

F. The consultant displays a worrying ignorance in regard to its assessment risks to largetooth sawfish. The real reason this species is not impacted is because Maud Creek is internally draining, towards Lake Gregory which is not a suitable sawfish habitat. The failure to demonstrate any real sensitivity to the risks to key species suggests that only lip service has been paid to the evaluation of risks to all significant species. It calls into question the validity of the assessment of risks to other significant species.

G. Implications to "organic" status of neighbouring properties. The proposal which applies to land on a floodplain near the lease boundary will inevitably result in chemicals leaving the property during wet season flows. Weeds will also need to be controlled downstream of the property on Wallamunga Station via use of herbicides. This proposal therefore limits the opportunities for downstream properties to qualify for "organic" status.

H. Approval of clearing which is not an integral to pastoral activities as envisaged under the Pastoral Lands Act and approval of this activity is inconsistent with the objects of the Pastoral Lands Act.

I. Risks of subsequent proposals for floodplain harvesting. This proposal is particularly unsuitable for this activity given proximity to Maud Creek and downstream significant wetlands. Clearing these grasslands increases the risk of subsequent floodplain harvesting. This risk is not addressed in Attachment 13.

CONCLUSION

This is an enormous application. It would take a day to walk its perimeter. As a responsible decision maker it is simply unacceptable to continually wave this type of proposal through without a proper field assessment and environmental referral. The Traditional Owners must be consulted (including the owners of the impacted Birrindudu wetlands), the cumulative impacts must be considered and the Pastoral Lands Board must be able to properly answer the question “what is the risk to introduction of tillage to vertisols?”. It must not allow further degradation of these iconic soils and wonderful grasslands.

For the reasons cited I request that the Pastoral Land Board refuse this application and refer this to the Environment Protection Agency under the Environment Protection Act for full and thorough assessment.

Yours sincerely,

[redacted]

CC
Dr Paul Vogel, NTEPA
Environment Centre NT
Northern Land Council
Department of Climate Change, Energy, the Environment and Water