[redacted]
PO Box 9124
Alice Springs
NT 0870

28 April 2023
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application - Dungowan Station PPL 1076 NT Portions 850 & 2114 Sturt Plateau Pastoral District

I am writing to request that you reject the application by Troy Setter Consolidated (CEO) Pastoral Company PL to clear 476.95 ha of native vegetation on the for pasture production.

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, an ecosystem described as being in a state of collapse.
2. Climate change and greenhouse gas emissions from the project and lack of offsets.
3. Failure to explicitly consider impacts on cultural heritage.
4. 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.

The application lists a wide range of species based on desktop studies, but no field survey. This demonstrates unsuitability 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.

As described the proposal in itself could have a significant impact on biodiversity if species which may occur on the land do in fact occur. I am also concerned about the chronic degradation of biodiversity associated with the numerous clearing applications in train, which are occurring in the absence of any strategic plan for biodiversity conservation or clearing, especially given the severe risk posed by climate change and the NTG's chronic failure to manage other environmental risks (e.g weeds, ferals, livestock), which have led to the tropical savanna ecosystems being characterised as in a state of collapse[1].

This application does not stand alone as being environmentally acceptable. The main argument for mitigation of risk appears to be the claim that few other station

[1] https://theconversation.com/existential-threat-to-our-survival-see-the-19-australian-ecosystems-already-collapsing-154077

owners have cleared their leased land yet. If every station owner did this then the NT would be left with a massively reduced woodland extent. It is clear that similar applications are coming in thick and fast and the Pastoral Lands Board has lost control of this process, it must impose a moratorium on clearing approvals.

There is no social licence or public benefit for the current laissez faire approach and the Pastoral Lands Board needs to engage with the public properly in a strategic discussion about land clearing at a regional scale rather than facilitating a death by a thousand cuts approach under the “simplified” pastoral land clearing process.

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

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

The offsets framework makes clear offsets *cannot be used to make an unacceptable impact acceptable.* This proposal is unacceptable. There is no public interest in clearing this land, given it will result in avoidable carbon emissions.

While the application does not mention greenhouse gas emissions from planned fertiliser and stocking rates it acknowledges 35,062 tonnes CO2 emissions from clearing. At a conservative spot price of $50 tonne CO2 this represents cost shifting onto the public of $1,753,100. This is deeply outrageous. While I oppose any unnecessary carbon emissions, under any sober policy made in the public interest the cost of offsetting carbon losses must surely be borne by the beneficiary.

As Consolidated Pastoral Company holds eight pastoral leases across Australia its emissions must be considered in total. Has it already been gifted more than 500,000 tonnes of CO2 emissions by the NTG, or other state jursidictions?

Given the pressure to make deep cuts in emissions now I reiterate this is an unacceptable proposal and this needs to be reflected in a sober public policy that is consistent with the scale of climate change threat and reflects recent policy changes such as those made via the “safeguard mechanism”. There is no reason to treat this company different to all other industries No "value proposition" is put forward that makes the case that a small increase in station income yields a benefit that is commensurate with the cost of this massive carbon release; and, this benefit is not shared evenly.

Inadequate authority certificate granted under the Northern Territory Aboriginal Sacred Sites Act 1989.

An Abstract of Records is provided but this is insufficient to determine whether sacred sites exist as a Sacred Sites clearance involving Traditional Owners attending the site has never been undertaken.

I note that there is a native title determination over parts of Dungowan station. The Pastoral Lands Board must seek the Native Title Holders’ approval for a change in land use on the land.

Lack of assessment under the Environment Protection Act 2019.

While I am firmly opposed to this proposal I consider that if the applicants wish to proceed it should 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 to this application, which details significant but poorly defined risks to the environment the Pastoral Lands Board should.

Thank you for considering my submission.

Sincerely,

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