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Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Land Board,

RE: Standard Pastoral Land Clearing Application – Mathison Station Katherine Pastoral District, Portion 7061, PPL 1224

I am writing to request that you reject the application by Pancho Beef - Jay and Rebecca Mohr-Bell to clear 4,517 ha of native vegetation, for the purposes of growing hay and fodder crops on Mathison Station.

I am strongly opposed to this large proposal on grounds A – E, which I expand on below.

A. The scale of the development

Section 3 of the application states "The scale of the development is required to justify the necessary investment in the required equipment and infrastructure."

- This statement is unacceptable, especially given the large and unknown environmental impacts and risks and the costs borne by the public (e.g. carbon emissions – expanded upon in D).
- A sweeping statement about return on investment is not sufficient to justify such an enormous project on public land. While I dispute the premise of the argument, more details on the applicants costs-benefit analysis is required.

B. Biodiversity impacts, specifically:

1. Unknown, avoidable and unacceptable risk to significant and threatened species and communities
2. Risks to significant soils and introduction of tilling
3. Destruction of significant vegetation

I am very concerned that the applicant has only drawn upon existing data collected along roadways. The proposed clearing will impact a significant area of in-tact and highly productive vegetation close to a major tributary of the Dry River.

The proposed clearing under the NTEPA's self-assessment on impacts to terrestrial ecosystems – these should have been assessed as "yes" and the proposal referred to the NT EPA for an EIA. The applications fails to meet numerous (most) criteria. For example:

Criteria	Reason for failure
vegetation that provides an important ecological function	No data
listed threatened species and their habitat	Inadequate data – no relevant field data
Locally endemic species or species with restricted habitat	No data
Species of social, cultural, livelihood and/or economic significance	No information / no consultation with Traditional Owners demonstrated

C. Water impacts

Section 8.3 – the sinkhole to the north of the clearing area should be identified as within proximity especially given the land drains towards the sinkhole – see image 1.

Impacts on regionally waterways and aquifers, and associated impacts on biodiversity and receiving groundwater dependent ecosystems (e.g. Flora River) from:

1. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle waste would be expected to be greater than 500 tonne of N annually based on similar recent applications to the PLB, however this is not quantified in this application.
2. Use of herbicides and pesticides are proposed without any specific details of how they will be applied. A register of chemicals is not provided. Chemical spray drift is only considered in respect to human health or waterways, including sinkholes, which pose a rapid conduit to groundwater or ecosystems. The recent $100m cost to cotton associated with spray-drift from 2, 4-D[1], highlights the commercial risks and raises extremely important concerns regarding risks to any nearby broadleaved / sensitive native plants.
3. Introduction of environmental weeds - specifically sorghum which is proposed to be planted. There is significant evidence that sorghum can persist as an environmental weed, especially near waterways. https://www.ogtr.gov.au/sites/default/files/files/2021-07/the_biology_of_sorghum.pdf

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

It is an absolute outrage that 625 000 tonnes of carbon emissions are associated with the proposal and the impact of this is borne entirely by the public and not by the company that primarily benefits / profits from this project.

The applicant has clearly demonstrated that it does not respect the seriousness of GHG emissions, nor does not understand NT Government policy. It has failed to provide a threat abatement plan.

The above directly conflicts with the *NT GHG Management for New and Expanding Large Emitters Policy* which establishes a threshold for Scope 1 emissions for projects exceeding 500 000 tonnes carbon emissions generated " beyond which the following management obligations are needed:

[1] https://www.abc.net.au/news/rural/2023-01-06/spray-drift-damages-100-million-dollars-of-cotton-darling-downs/101816638#:~:text=ABC%20Rural-,Spray%20drift%20damages%20up%20to%20%24100%20million%20in%20cotton,calls%20for%20more%20herbicide%20controls&text=Anyone%20can%20buy%20the%20herbicide,prompting%20calls%20for%20more%20controls.

- "Proponents of all new projects and expansions of existing projects to subject to this policy must develop and implement a greenhouse gas abatement plan (GGAP) that has been tailored specifically for their project".
- The proposal should submitted to the NTEPA for EIA i.e. " A project's GGAP should be submitted for assessment as part of the usual process for a project to obtain an environmental authorisation."

The applicant has stated "no" to the NTEPA screening questions (p62 of the application) regarding "Atmospheric processes – minimise greenhouse gas emissions so as to contribute to the NTG's goal of achieving net zero green emissions by 2050". This is clearly wrong, and in conflict with the abovementioned management applications. The proponent should have identified for this theme that Questions 1 is applicable and answered questions 1, 2, 4 and 5, as "yes".

As well as these impacts being unacceptable and clear grounds for referral to the NTEPA, it is also clear the impacts have not been minimised because:

- The chosen site is heavily wooded.
- The proposal has been increased beyond what is needed to achieve economies of scale**. It is unacceptable for the applicant is imposed the cost (many millions of dollars) of its carbon emissions on the public in order to make the project marginally viable for itself.** The full offset cost should be borne by the applicant.
- Such clearing is not essential to pastoral activities

E. the application does not include any consultation with Traditional Owners about impacts on cultural values nor archaeological surveys. While AAPA has advised on archaeological sites there is no a meaningful consideration of the cultural values associated with the area.

F. Conflicts with the NT Pastoral Land Act

The proposal conflicts with the following objects of the Pastoral Lands Act:

a. to provide a form of tenure of Crown land that facilitates the sustainable use of land for pastoral purposes and the economic viability of the pastoral industry;

b. to provide for:

i. the monitoring of pastoral land so as to detect and assess any change in its condition;
ii. the prevention or minimisation of degradation of or other damage to the land and its indigenous plant and animal life; and
iii. the rehabilitation of the land in cases of degradation or other damage.

CONCLUSION

For the reasons stated above I request that the Pastoral Land Board refuse this application or refer it to the NT Environment Protection Authority under the Environment Protection Act for a full and thorough assessment.

The recent scrutiny of the regulation of clearing has highlighted systemic failings in how proponents' perceive and mitigate environmental risks. This failing is manifest throughout this flippant and unnecessary proposal. Ultimately the failure to protect pastoral lands rests with the NTEPA and

Pastoral Lands Board, I urge both organisations to recognise the seriousness of this proposal, which is more than 2000 football ovals in size and contains no field information on fauna within this massive area.

Thank you for considering my comments.

Regards,
[redacted]