[redacted]
PO Box 9124
Alice Springs
NT 0870

15 July, 2022
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application – Mount Ringwood Station

I am writing to request that you reject the application by Markus Rathsmann to clear 826.9 ha of native vegetation to "service the live export trade". **The proposal is inadequately described, it is assumed the applicant intends to use the land as holding paddocks / to grow pasture to feed stock prior to and during live export.**

If this proposal is not rejected immediately, then it should be subject to environmental impact assessment under the NT EPA Act, which I expect would lead to the proposal being rejected.

I am strongly opposed to this proposal on grounds of:

1. Intensification of cattle grazing on the margins of waterways
2. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle degradation, with associated impacts on biodiversity
3. Climate change and greenhouse gas emissions from the project and lack of offsets
4. Biodiversity impacts, including risks to threatened species and significant vegetation
5. Failure to consider impacts on cultural heritage
6. Intensification of cattle grazing with fertilised crops requires a diversification permit
7. Inadequacy of a pastoral clearing application to deal with the types of risks posed by this application and the need for assessment under the NTEPA Act

1. Intensification of cattle use on the margins of waterways

More cattle and in low lying occasionally inundated areas would be expected to cause export of sediment to waterways and damage damp land areas.

2. Risk of degradation, contamination and eutrophication of waterways

Increased nutrient and chemical loading to waterways should be expected as:

- Appendix C Grazing '- highlights "Maintenance fertiliser to be applied if / when requires pending soil / plant analysis"
- Section 14.2 p.25 identifies "chemicals used for weed and pest control and fertiliser".

Additional exports of nutrients, turbid runoff and bacteriological contaminants would be associated with increased cattle numbers on the property.

There is a real risk that these could be largely be washed into waterways. ***Assessment this pastoral land clearing application under the Pastoral Lands Act, is not a suitable process to assess these risks.***

3. 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. The offsets framework makes clear offsets *cannot be used to make an unacceptable impact acceptable.*

Given the urgency to make deep cuts in emissions now this is clearly an unacceptable proposal as it is likely to involve release of 88355 tonnes of stored carbon, in addition to the carbon released from historical clearing and the other clearing application currently before the PLB.

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 extra carbon release from the proposed clearing.

It is also impossible to make comment on greenhouse gas emissions from planned fertiliser and stocking rates. These should also be included in emissions estimates.

Further any benefits are not shared evenly. The cost of offsetting carbon losses must be paid by the proponent. At present the stored carbon in this publicly owned leased land is being gifted to the lessee to release into the atmosphere causing harm.

4. Biodiversity impacts, including impacts on threatened species and significant vegetation

A search of NR Maps lists a large number of significant fauna species in the area. The threat to these is increase through increased risks from:

1. Fire
2. Feral animal management
3. Habitat loss from clearing
4. Introduction of invasive grasses
5. Loss of food sources for threatened fauna
6. Inadequate wildlife corridors

These risks are discussed below:

1. Manage frequent, intense fire fires.

The applicant admits they have failed to manage frequent, intense fires. The application states repetitively page 9-16:

> *"NAFI data indicates that much of Mt Ringwood and surrounding properties are regularly affected by large scale fires"*

Failure to adequately manage fires should not be used as justification to cause more fires or not care for vegetation.

The lack of trees >20m tall, suitable for the Grey Falcon, may be ascribed to historic failures to manage fires and weeds adequately or protect the trees from stock.

2. Provide a management plan and evaluation for feral cat management

The application only states “feral cats are ubiquitous across mainland Australia”

Given these existing land management failures, the station should not be permitted to create other threats.

3. Habitat from clearing

The applicant claims that threatened species habitat modification by clearing is acceptable because there is “potentially suitable habitat across Mt Ringwood and all adjoining properties”. However, there is no guarantee this habitat will be protected.

Eucalyptus miniate is habitat critical to survival of a number of threatened species (e.g. Black Footed Tree Rat, Masked Owl and Northern Brush-tailed Phascogale) On p 15 the applicant states “Proposed clearing does not include Eucalyptus miniate / tetrodonta”, ***however the following clearing site maps contain Eucalyptus miniatia***

- Map Unit 7 (Rep site 1675)
- Map Unit 8 (Rep site 1686) (previously cleared)
- Map Unit 10 (Rep site 1893)

Melaleuca is a habitat critical to the survival of a number of threatened species (e.g. Masked Owl (northern)). Many of the sires proposed for clearing contain Melaleuca.

Fragmentation of habitat is a major issue that is not addressed.

The threat this poses is well established. For instance, the *National Multi-species Recovery Plan for the Partridge Pigeon [eastern subspecies] Geophaps smithii smithii; Crested Shrike-tit [northern (sub)species] Falcunculus (frontatus) whitei; Masked Owl [north Australian mainland subspecies] Tyto novaehollandiae kimberli; and Masked Owl [Tiwi Islands subspecies] Tyto novaehollandiae melvillensis, 2004 – 2008*:
https://citeseerx.ist.psu.edu/viewdoc/download?doi=10.1.1.193.8273&rep=rep1&type=pdf

> *“found that the population of common brushtail possums Trichosurus vulpecula and black-footed tree-rats Mesembriomys gouldii was near a carrying capacity imposed by hollow availability, and that possums monopolised hollows particularly in woodland fragments. Trends to increased frequency, intensity and scale of fires over the last 50 or so years, and in part more recently magnified by invasion of exotic pasture grasses, have probably resulted in declines in the number of the largest eucalypt trees, especially where these were extensively hollowed”.*

The proposal involves increased stocking rates with associated increased sediment, nutrient, pesticide and herbicide export to waterways which increase the risk to habitat of Merton Water Monitor, Mitchell’s Water Monitor and the yellow spotted monitor

The application does not attempt to propose acceptable mitigations such as nutrient management plans or fencing waterways, nor does it describe how these biodiversity risks will be offset. I believe an assessment under the NT EP ACT is necessary to consider these risks.

4. Introduction of invasive grasses threatening neighbouring habitat and increasing fire risks

Tully grass is invasive
https://landforwildlifetopend.com/2015/03/03/urochloa-humidicola-tully-grass-introduced-pasture-grass/
The NTG has given it the highest possible weeds risk rating - 'very high'.
https://depws.nt.gov.au/__data/assets/pdf_file/0004/291514/darwin-regional-weeds-strategy.pdf

It is not appropriate for a clearing licence to be approved in order to facilitate the deliberate planting and spread of a very high risk invasive pasture grass.

The applicant claims that threatened species habitat modification by clearing is acceptable because there is "potentially suitable habitat across Mt Ringwood and all adjoining properties". However, there is no guarantee this habitat will be protected.

The claim is particularly unconvincing given the applicant stated in the same section that:

- "NAFI data indicates that much of Mt Ringwood and surrounding properties are regularly affected by large scale fires, as such habitat impacts are likely to have occurred on this and adjoining stations."
- The proposal involves invasive grasses

The 'available information' is not adequate for assessment. Recent / periodic baseline data is required for assessment.

5. Impacts on food sources for threatened fauna from loss of vegetation, damage to termite mounds and use of pesticides and insecticides

The proposal involves extensive destruction of brown cathedral termite mounds which are a food source for Fawn Antichinus.
https://depws.nt.gov.au/__data/assets/pdf_file/0010/249355/jrr05_issue3.pdf

Acacias and other woody plants are an important food source for threatened Partridge Pigeons.
https://nt.gov.au/__data/assets/pdf_file/0003/206355/partridge-pigeon.pdf

6. Inadequate Wildlife corridors / buffers

Given this will be a high concentration livestock area and the land will be disturbed , how will these corridors be protected? Will they be fenced? If so how will native animal access be facilitated?

Chemical drift – how will the wildlife corridors and water ways be protected? Will the 210m "boundary buffer" be set between these? Appendix E 4. (p 3) (a land management buffel is different to a wildlife corridor or property boundary buffer" = Nil

Appendix E 3. (p 2) – Mt Ringwood Road 210m from entrance to property may currently be used only by station related traffic. However, it is not the station driveway. A sense of entitlement to public roads is not a valid reason for no property boundary buffer to be retained. A buffer must be applied.

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

Only a map of previously identified heritage sites is provided in the application, with no on-ground surveys.

Furthermore, no consideration is given to cultural significance of the location.

This area is more generally contains highly significant cultural landscapes and surely the advice of the custodians should have been sought in relation to this proposal.

In her correspondence Dianne Bensley, Senior Heritage Officer, states it is possible archaeological sites will be discovered.

Require proof that those conducting the clearing have the ability to identify an archaeological site.

7. Intensification of cattle grazing with fertilised crops requires a diversification permit.

Self-explanatory.

8. Inadequacy of a pastoral clearing application to deal with the types of risks posed by this application and the need for assessment under the NTEPA Act

I'm deeply concerned that the proximity of the application to waterways, the substantial risks posed to waterways from contamination from increased cattle numbers, chemicals used for weed and pest control and eutrophication by fertiliser, the additional carbon emissions associated with clearing, and the inadequacy of a pastoral clearing application to assess these risks requires that this application must be referred to the NTEPA for environmental impact assessment, if it is not to be rejected outright by the Pastoral Lands Board.

Thank you for considering my submission.

Sincerely,

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