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NT 0870

24 June 2022
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application – Newcastle Waters

I am writing to request that you reject the application by Helen Groves, representing Consolidated Pastoral Company Pty Ltd to clear 3990.55 ha of native vegetation for the purposes of non-irrigated sorghum production on Newcastle Waters station.

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 wetlands and waterways close to Lake Woods
2. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle degrading an internationally important wetland, with associated impacts on biodiversity
3. Further degradation of Newcastle Creek
4. Climate change and greenhouse gas emissions from the project and lack of offsets
5. Biodiversity impacts, including risks to threatened species and significant vegetation
6. Failure to consider impacts on cultural heritage
7. Intensification of cattle grazing with fertilised crops requires a diversification permit
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

1. Intensification of cattle use on the margins of wetlands and waterways close to Lake Woods

Lake Woods is listed on the Register of the National Estate and the Directory of Important Wetlands in Australia (DEWHA 2007) and is classified as a site of conservation significance by the Northern Territory Government. About 8% of the land is managed as the Longreach Waterhole Protected Area by the Northern Territory Government in cooperation with the lease managers.

I believe the public interest is in securing Lake Woods and preserving the current investment in conservation, not in intensifying pastoral activity, in an area which is on

the fringes of the system and directly connected to Lake Woods both via Newcastle Creek and a culvert under Stuart Hwy which may short circuit overland flow in high flow periods. The application makes clear that in wet years the area is inundated and not suitable for grazing.

2. Risk of eutrophication of Lake Woods and Newcastle Creek

The application outlines an intention to apply 100kg/ha DAP fertiliser, pre commencement of wet season, in early November. If this is done over the total clearing application of 3990 ha then this represents approximately 400 tonnes of DAP fertiliser per annum. There is a real risk that this could be largely be washed into Lake Woods in a wet summer. Additional exports of nutrients, turbid runoff and bacteriological contaminants would be associated with increased cattle numbers on the property.

Assessment this pastoral land clearing application under the Pastoral Lands Act, is not a suitable process to assess these risks.

3. Increased degradation of Newcastle Creek

As a long-term resident of Alice Springs I always look forward to crossing Newcastle Creek, which is a significant landscape feature on the Stuart Highway. However I also despair that this wonderful waterway, which drains the Barkly Tablelands and maintains Lake Woods is heavily damaged by stock. Newcastle Creek should not be subject to cattle grazing. This degradation will be intensified if this problematic application is permitted.

4. 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.*

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.

Given the pressure to make deep cuts in emissions now I reiterate this is an unacceptable proposal. 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.

Further any benefits are not shared evenly. The cost of offsetting carbon losses must be paid by the proponent.

5. Biodiversity impacts including impacts on threatened species and significant vegetation

A search of NR Maps lists a large number of significant flora and fauna in the area especially associated with Lake Woods and Newcastle Creek. These include threatened flora such as *Revialata Atalaya* and threatened fauna including the princess parrot plains, the death adder, the painted honeyeater, the grey falcon and the Australian painted-snipe.

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.

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

Only an abstract of record of sacred sites is provided with no on-ground surveys. Furthermore no consideration is given to cultural significance of the location. I understand Newcastle Creek and this area more generally comprise highly significant cultural landscapes and sure the advice of the custodians should have been sought in relation to this proposal.

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 Lake Woods, the substantial risks posed to Lake Woods from eutrophication by fertiliser and increased cattle numbers, the size of the application (which is close to the 5000 ha threshold), degradation of Newcastle Creek, 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,

Jacqui Arnold