[redacted]
PO Box 9124
Alice Springs
NT 0870

4 November 2022

Pastoral Lands Board
Via 'Development Applications Online'

To the Pastoral Lands Board,

RE: Simplified Pastoral Land Clearing Application – Newry Station, NT Por 2675, Victoria River District, PPL 1114, 787ha

I am writing to request that you reject the application by Steven Petty, representing Clean Agriculture and International Tourism Pty Ltd, to clear 787 hectares of native vegetation for the purposes of introduced ('improved') pasture, fodder for grazing.

The applicant has failed to recognise that the **location is approximately 2 km from the Keep River Site of Conservation Significance, which is classified as *Internationally Significant*[1].**

Furthermore, the information on the **Keep River Site of Conservation Significance**[1] highlights that the sandstone ridges, like those on the other side of Moriarty Creek, have a breeding population of Gouldian Finches (which are listed as endangered under the Environmental Protection and Biodiversity Conservation Act (EPBC Act). Gouldian finches are also recognised as occurring on Newry station, including historically observations on the Keep River upstream from the site of proposed clearing. The applicant's self-assessment of the risk to Gouldian Finches is extremely flippant and lacks any evidential basis. This is unacceptable. The risk to Gouldian Finches should be assessed under the EPBC Act, based upon detailed field assessment.

The information on the **Keep River Site of Conservation Significance**[1] also highlights that adjacent blacksoils, such as the subject area, support threatened and range restricted species, including the VRD Blacksoil Ctenotus. The blacksoils in proximity to the Keep River conservation area, such as the land subject to this application, should therefore be retained as native vegetation.

The proposal risks introduction of weeds into the **Keep River Site of Conservation Significance**.

The proposal is on low lying areas adjacent to Keep River and Moriarity Creek and appears to be traversed by occasional drainage lines immediately upstream of the **Keep River Site of Conservation Significance.** This introduces water contamination and erosion risks to Keep River. These include:

- turbidity from tilling/clearing loss of binding roots,
- erosion
- nutrient enrichment from fertilisers and animal waste
- organic chemicals from pesticides and herbicides
- along with risks from weeds moving down riparian areas.

This is significant and unacceptable as there are numerous ecosystem values in the lower reaches of the Keep River, including two threatened sawfish species. The application does not give any useful consideration to these risks.

[1] https://territorystories.nt.gov.au/10070/254346

In addition to these specific and substantial risks to the **Keep River Site of Conservation Significance,** I would like to highlight the following additional risks.

1. The 'development' conflicts with the 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.

2. There are numerous other threatened species exposed to unacceptable risk

The Ghost Bat, Grey Falcon, Mitchell's Water Monitor, Pale Field Rat, Red Goshawk, Yellow-Spotted Monitor are identified in proximity to the site.

The Red Goshawk is the threatened species that has lost the most potential habitat in area (3 million ha) to clearing 2000-2021 across Australia[2]. It is closely followed by the Ghost Bat (2.8 million ha)[2]. Regional and Australia-wide impact assessments of the cumulative loss of habitat for these respective species, must be conducted.

3. Cultural Heritage

The applicant has provided an abstract of records for registered sacred sites but has not considered the impacts on cultural heritage.

Two registered sacred sites occur immediately adjacent to the proposed clearing (to the west and south respectively). These highlight the need to undertake field surveys and discuss the acceptability of the proposed clearing with the custodians and Native Title holders. This has not occurred.

4. Environmental Protection
Climate change and greenhouse gas emissions are not quantified but are potentially around 100 tonne per hectare. These are significant and warrant the application being refused.

For the reasons stated above I consider a pastoral clearing application should be refused.

In addition this application process is inadequate to deal with risks associated with EPBC listed species. ***I request that the Pastoral Land Board refuse this application and refer to the Environment Protection Agency under the Environment Protection act for a full and thorough assessment and consideration of the necessity for referral under the EPBC Act***

Regards,
[redacted]

Attachment: NR Maps extract

Copies to:
Chair NT EPA (attention: Dr Paul Vogel)
Director, Environment Centre NT (attention: Dr Kirsty Howey)

[2] https://soe.dcceew.gov.au/biodiversity/pressures/industry#-bio-043-figure-32-the-10-threatened-species-that-have-lost-a-the-largest-proportion-of-potential-habitat-to-land-clearing-since-2000-b-the-most-potential-habitat-in-area-since-2000