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NT 0870

Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application – Scott Creek Station PPL 1037, NTP 3981, Katherine Pastoral District 1,995.3ha

I am writing to request that you reject the application by Helen Groves, representing Cross Pacific Investments Pty Ltd. to clear 1,995.3 hectares of native vegetation for the purposes of dryland cropping on Scott Creek pastoral lease.

It should be rejected, and the project as a whole immediately referred for assessment under the *Environment Protection Act NT* and *Environment Protection and Biodiversity Conservation Act (Cth)* as it clearly meets the threshold of having the potential to have a significant impact on the environment and a number of matters of national environmental significance.

I am strongly opposed to this proposal on grounds of:

1. Biodiversity impacts, including

a. Risks to soil from the removal of native vegetation and introduction of tilling

There is inadequate explanation of the likely impacts on sediment run-off, erosion, dust and soil quality in the application. The tillage of Scott Creek Station will significantly increase the risk of soil degradation, erosion and dust, particularly in years when it is not possible to plant crops due to low rainfall. There is the potential for contamination of soils from chemicals and fertilisers applied on the area, as well as changes to soil structure.

b. Destruction of significant vegetation

c. Unavoidable and unacceptable risk to native species

The range of significant species and acknowledged moderate threat to **threatened species** makes it highly inappropriate for the PLB to consent to this clearing.

A search of NR Maps shows the occurrence of a large number of significant fauna on Scott Creek station. These are: Orange Leaf-nosed Bat; Northern Nailtail Wallaby; Timber Creek Keeled Snail; Western Chestnut Mouse; Australian Bustard; Victoria River Squat Snail; White Bellied Sea Eagle; Buff-sided Robin; Rainbow Bee-eater

There are 18 listed threatened species that may be impacted by the proposed development, including the northern brushtail possum, the northern quoll, the Gouldian Finch, the partridge

pigeon and the freshwater sawfish. The Department's own research indicates that clearing over 1500ha within a 3000ha area may have significant impacts on biodiversity and make some populations unsustainable at a landscape scale. This is undoubtedly a significant impact.

How has the risk to threatened species gone from moderate (previous application) to low impact?

The occurrence of **significant species** are also under threat and should be considered.

All native species are protected under the *Parks and Wildlife Act*. Threats to these must be considered.

There is no mention whatsoever in the application of the cultural significance of these species or sites.

I note the landscape is under threat from forces such as livestock and feral animals, weed invasion, climate change, and an uncertain number clearing applications.

2. Impacts on regionally important wetlands (…) with associated impacts on biodiversity from:

The land clearing could cause significant sedimentation and run-off into Scott Creek and eventually the Flora/Katherine/Daly system, as well as chemical run-off into these water courses and the Tindall aquifer via sinkholes located on the property.

a. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle waste

b. Use of herbicides and pesticides without any specific details of how they will be applied

c. Introduction of environmental weeds

I strongly believe there should be efforts to recover this area, not further degrade it.

3. Cumulative impacts of regional clearing and associated risks to biodiversity.

I am extremely concerned that over 13% of the Daly catchment is already cleared, and there are no caps in place to prevent largescale devastation of this highly valued region, with irreversible impacts, including on the magnificent free-flowing Daly River.

The application details a long history of clearing

Area described in Section 4 of the application do not match current permits:
PLC 21/04 - 879.06 permitted, application claims 880.422ha
PLC 21/08 – 558.86 permitted, application claims 559.671

leaving little riparian vegetation which would act as a biodiversity refuge, wildlife corridor, and barrier to sediment and chemical run-off

This application brings the Proponent's entire development to 4925.3ha. Taken cumulatively, this is an extremely large development that is likely to have significant environmental impacts which must be understood.

This is a very significant development with considerable cumulative impacts in an area of high conservation significance (being located close to the confluence of the Flora and Katherine rivers).

Given the litany of past and present applications on the property the Pastoral Lands Board has lost the ability to control and evaluate the cumulative impact of clearing activities at the site. It must require the proponent to submit a development plan for the entire property and the cumulative impact of the numerous plans for clearing be assessed in an orderly and thoroughgoing way. As stated this should be via the more comprehensive Environmental Impact Statement process.

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

Climate change and greenhouse gas emissions from the project and lack of offsets. It is an absolute outrage that 405, 775 tonnes of carbon emissions associated with this single clearing application associated with Scott Creek. I firmly believe this is grounds for rejecting this proposal. These impacts warrant an EIS. While I believe carbon emissions make the proposal fundamentally untenable, at a minimum I believe they must be offset at cost to the applicant.

5. Risks sorghum becoming an environmental weed in nearby wetlands and the significant use of unspecified herbicides and pesticides

i. Cotton

ii. Sorghum which is proposed to be planted and there is significant evidence that these can persist as environmental weeds https://www.ogtr.gov.au/sites/default/files/files/2021-07/the_biology_of_sorghum.pdf

6. **Failure to consider impacts on cultural heritage**

There are likely to be sacred sites in the vicinity of the Application area. A registry extract is manifestly inadequate to protect these, and any other sites that may exist in the area. An authority certificate granted under the Northern Territory Sacred Sites Act 1989 (NT) should be a mandatory requirement.

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**

Dust
Only notes risks to 'neighbours' not to surrounding flora and fauna.

8. 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.

For the reasons stated above I would recommend that the Pastoral Land Board refuse this application and refer this to the Environment Protection Agency under the Environment Protection act for full and thorough assessment.

Yours Sincerely,

[redacted]