[redacted]
PO Box 9124
Alice Springs
NT 0870

18 February, 2022
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Singleton Station, PPL1022, NTP 653, Tennant Creek Pastoral District

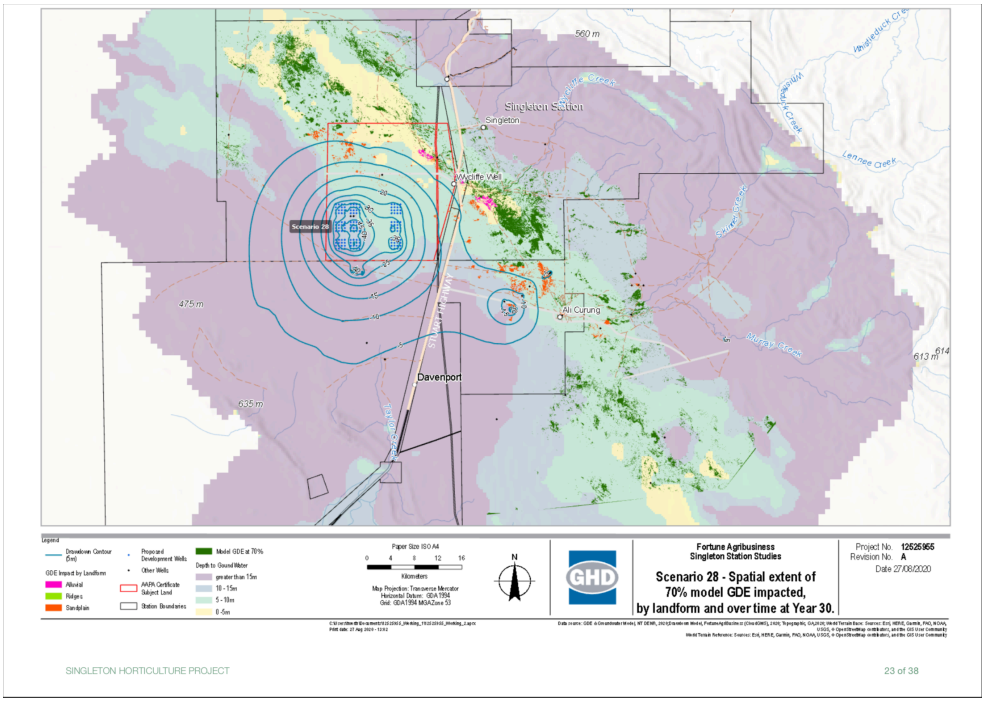
I am writing to request that you reject the application by Mr Peter Wood, Director of Fortune Agribusiness Funds Management Pty Ltd, to clear 3 944ha of native vegetation on the above station on top of 14ha already cleared for the purpose of production blocks, bore fields and access roads.

I am strongly opposed to this proposal on grounds of:

1. Lack of inclusion of clearing of groundwater dependant vegetation through groundwater drawdown
2. Lack of inclusion of clearing though spread of invasive pasture grasses
3. Failure to satisfactorily address weeds listed in the Tennant Creek Weeds Management Plan
4. Impacts on biodiversity, threatened species and significant vegetation; including loss and fragmentation of essential habitat.
5. Destruction of native vegetation in the Taylors Creek Riparian zone
6. Climate change and greenhouse gas emissions from the project and lack of offsets.
7. Unsuitability of irrigated horticulture in the NT with its associated high water demand
8. Failure to satisfactorily address impacts of cultural heritage (sacred site protection across the entire drawdown (cleared) area)
9. Inappropriate assessment process - Lack of assessment under the Environment Protection Act 2019.
10. Assessment while legal action in relation to the project is underway

1. Lack of inclusion of clearing of groundwater dependant vegetation through groundwater drawdown

The total drawdown area, and the 30% of groundwater dependant vegetation being cleared by this project as a result of drawdown, must be included in this land clearing application.



(Page 23 Fortune Agribusiness *Singleton Horticulture Project Summary Report* August 2020)

2. Land clearing resulting from spread of planted invasive pasture grasses must be modelled and included in the application

The application does not include a specific plan for ensuring invasive pasture grasses, such as Rhodes Grass, planted for fodder (page 91 of application) do not spread outside the planted area. Invasive pasture grasses effectively clear land. They:

- Dominate light and space, reducing opportunities for native vegetation, including trees, to establish
- Carry a high fuel load and cause very hot, widespread, frequent fires that kill trees.

Land clearing resulting from the potential spread of planned planting of highly invasive pasture grasses should be modelled and a specific risk mitigation plan included in the application.

Vague reference to weed management plans and buffer zones that do not define what weeds will be management outside those declared under the Weeds Management Act 2001 or consider widespread airborne seed dispersal are not sufficient.

3. Failure to satisfactorily address weed issues described in the Tennant Creek Regional Weeds Management Plan

Increased level of soil disturbance and traffic related to this project in general, and land clearing in particular, will potentially impact the distribution of all weeds listed in the Tennant Creek Regional Weeds Management Plan. Management of these should be addressed in the application, at present it is limited to weeds declared under the Weeds Management Act 2001.

4. **Impacts on threatened species and significant vegetation; including loss and fragmentation of essential habitat in the ecosystem are inadequately assessed.**

I understand the majority of surveys of biodiversity, including threatened species observations, for this project were conducted between 2018-2020 during an extremely hot drought. Data collected during extreme weather events does not reliably represent biodiversity. Data should be collected, analysed and communicated in a manner which explicitly addresses confounders and effect modifiers.

Impacts on biodiversity across the entire drawdown area must be presented in this application.

The project will 'possibly' permanently destroy potential nesting habitat of the grey falcon. The proponent's responsibility to monitor and provide adaptive management strategies to maintain the health of these trees must match the impact timeframe – permanent, not the life of the project (page 15 application).

The potential impact on threatened species of noise and vibration during clearing is not addressed in the application (page 18 of application). This is not acceptable. The application must be rejected and resubmitted with a plan to manage these impacts.

Fire management in the application is focused on Fortune Agribusiness 'protection of their private assets, not the public asset of biodiversity. The application should be rejected in its current form and resubmitted with a plan to manage fuel loads on the property as a whole / the surrounding landscape, which is placed at a higher risk due this development, not limited to 'asset control zones' and 'around development areas' (page 18 of application).

Plans for protection of native vegetation/habitat quality in horticulture plot corridors from use of herbicides and pesticides need to be assessed under the Environmental Protection Act 2019 before they can be properly assessed.

Land clearing must not, under any circumstances, be conducted during breeding periods. (page 16 of application). It is unreasonable to conduct clearing in breeding periods, if it is not feasible for Fortune Agribusiness to conduct clearing outside these times, the clearing application must not be approved.

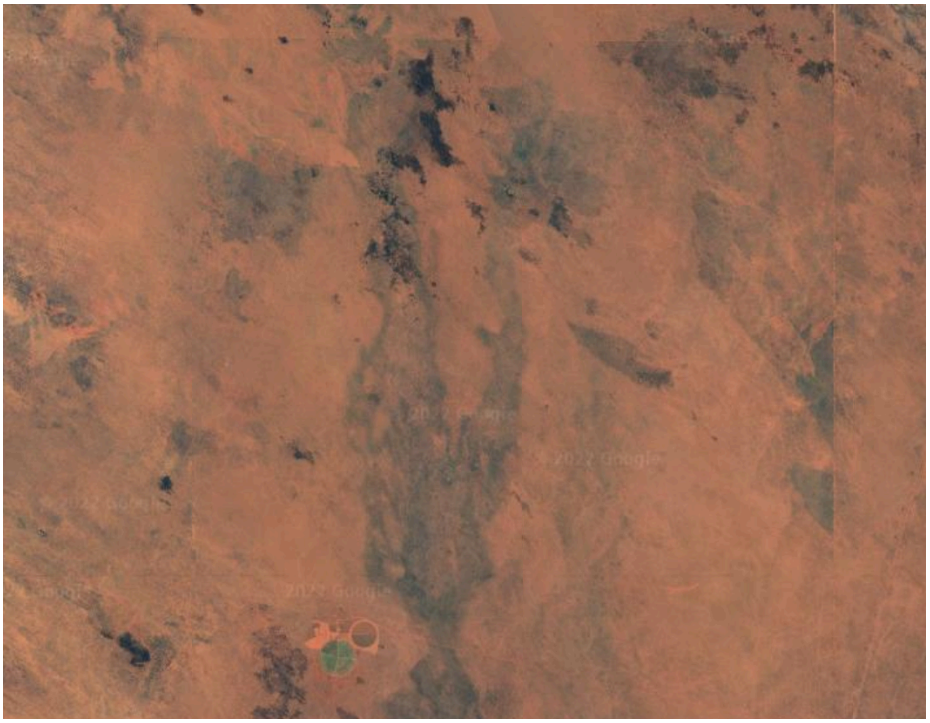
The risk to the Painted Honey Eater is assessed according to "current climatic conditions" (page 16 of application). Given climate change has commenced, modelling according to climate change scenarios is required to assess the risk to this and all other species impacted by this project.

Management of 'feral animals' must not impact dingoes, a protected native species under the Territory Parks and Wildlife Conservation Act 2000. Dingoes have coexisted with native species for millennia, there is no evidence that they pose a threat to native species, rather there is evidence that they protect them through predation of introduced threats such as feral cats.

5. Destruction of native vegetation in the Taylors Creek Riparian zone

Taylors Creek and it's flood out areas as defined by soil type, must be assessed as a 5. The rationale for ignoring the NRM classification, which amounts to a lack of understand and tools to undertake proper assessment, is not acceptable.

The claim that Taylor's Creek does not host riparian vegetation is not supported. Satellite images included in the application clearing show a riparian zone exists (the vegetation change in this zone is marked).



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

It is impossible to make comment on:

- Loss of stored carbon because the proposal does not even mention the loss of carbon storage.
- GHG Emissions from planned soil disturbance, fertiliser and stocking rates (though it is stated on page 71 that there are no plans for stocking, the next paragraph outlines a plan for stocking) should also be included in emissions estimates.

The effects of climate change are not considered in reference to rainfall and weather predictions (page 75 application).

6. Unsuitability of irrigated horticulture in the NT with its associated high water demand

This application should be denied based on the unsuitability of irrigated horticulture in arid zones of the NT and associated high water demands and environment and cultural costs.

7. Failure to satisfactorily address impacts of cultural heritage

Sacred site impacts are not adequately addressed. Traditional Owners publicly oppose this project. I trust the PLB will defer to their judgement.

8. Inappropriate assessment process - Lack of assessment under the Environment Protection Act 2019.

While I'm firmly opposed to this proposal I believe if the applicants wish to proceed with an application, it should first be subject to environmental impact assessment under the *Environment Protection Act 2019* and the *Environment Protection and Biodiversity Conservation Act 1999* (Cwth).

9. Should not be assessed while legal action in relation to the project is underway

I understand both the Central Lands Council and Arid Lands Environment Centre have filed proceedings to challenge the granting of the water licence for this project. The outcomes of the proceeding have the potential to significantly change the project, or even make it unviable. It seems sensible to defer judgement of this application until the case is resolved.

I am unsure whether clearing for waste management facilities will be included in this, or the subsequent land clearing application.

In summary I am opposed to this application being approved in its current form. The Application should:

(a) be rejected

(b) be deferred until assessment under both the Environment Protection Act NT and EPBC Act is completed

(c) be deferred until legal proceedings in relation to the project are completed

Yours Sincerely,

[redacted]