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9/09/22

Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application – Tandyidgee Station Barkly Pastoral District, Portion 2019, PPL 949

I am writing to request that you reject the application by Helen Groves, representing Consolidated Pastoral Company Pty Ltd to clear 4,977.3 ha of native vegetation for the purposes of non-irrigated sorghum production on Tandyidgee Station.

I am strongly opposed to this proposal on grounds of:

A. Biodiversity impacts, specifically:

1. Risks to significant vertisols from the removal of Mitchell Grass and introduction of tilling
2. Destruction of significant vegetation - Mitchell Grass
3. Unavoidable and unacceptable risk to significant and threatened species including the Plains Death Adder and Gouldian Finch

B. Impacts on regionally important wetlands (specifically Ian Chappell and North West Junction Swamps) with associated impacts on biodiversity from:

1. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle waste – 100kg/ha fertiliser is proposed
2. Use of herbicides and pesticides without any specific details of how they will be applied
3. Introduction of environmental weeds - specifically 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

(refer Fisher et al 2002 p18 on importance of wetlands on the Mitchell Grass Downs: (https://www.researchgate.net/publication/238723990_Mitchell_Grass_Downs_Northern_Territory).

C. Inappropriateness of clearing and tilling the Mitchell Grass Downs and vertisols - The Mitchell Grass Downs Bioregion is largely already under pastoral lease (>97%) under pastoral lease and consist of vertisols which are of national significance (refer page 94) and whose formation is contingent on Mitchell grass, cultural land management practices. They

should not be exposed to risk form tilling
https://www.dcceew.gov.au/sites/default/files/documents/desert-geoheritage-v2.pdf .

The application does not demonstrate these soils can be preserved. An EIS is needed to evaluate the risk to these soils from tillage.

D. Climate change and greenhouse gas emissions from the project and lack of offsets. It is an absolute outrage that nearly 500,000 tonnes of carbon emissions associated with the proposal. 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.

E. the application does not include any consultation with Traditional Owners about impacts on cultural values or archeological surveys. These must occur prior to any evaluation of this application in order for it to be based on a meaningful information. It is clear that vertisols like this are associated with significant cultural values (refer page 38 of attached which highlights kangaroo, nail tail wallaby, bush turkey etc are valued in Mitchell grasslands. – these values and loss of these values are not recognised
https://www.nlc.org.au/uploads/pdfs/NERP_Ganalanga-Mindibirrina_IPA-PoM.pdf)

F. Proximity to Elliot – This area (notably Ian Chappell Lakes which are threatened by nutrient contamination, weeds and grazing pressure) is immediately adjacent to Elliot. I believe it has potential to be an attraction for visitors to and residents from Elliot. Elliot residents should have been consulted about their views on clearing this area and damage to the Mitchell Grass Downs, especially wetland areas which Fisher et al 2002 p18
https://www.researchgate.net/publication/238723990_Mitchell_Grass_Downs_Northern_Territory which highlights wetlands as being of particularly high value.

No evidence of this consultation having occurred is presented.

CONCLUSION

For the reasons stated above I request 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]