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NT 0870

10 December
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application - Dry River Station PPL 1198 NT Portions 2977 & 3988 Sturt Plateau Pastoral District

I am writing to request that you reject the application by James Paspaley (Company Director) Paspaley Pastoral Company PL to clear 696.9 ha of native vegetation on the above station, on top of existing clearing of 431.7 ha, with the new clearing being for the purposes of irrigated and non-irrigated, grazing, hay production and cotton production.

I am strongly opposed to this proposal on grounds of:

1. Impacts on threatened species and significant vegetation; including loss and fragmentation of essential habitat in the tropical savannah ecosystem.
2. Climate change and greenhouse gas emissions from the project and lack of offsets.
3. Water balance changes and the potential for water contamination / pollution of wetlands, waterways and groundwater
4. Unsuitability of cotton farming in the NT with its associated high water demand
5. Failure to consider impacts on cultural heritage
6. Inappropriate assessment process - Lack of assessment under the Environment Protection Act 2019.

Impacts on threatened species and significant vegetation; including loss and fragmentation of essential habitat in the tropical savannah ecosystem.

The application lists a wide range of species based on desktop studies, but no field survey. I consider this demonstrates unsuitability to self-assess potential risk to protected matters and to self-refer where scientific uncertainty exists about the likelihood of a significant impact occurring or being likely to occur.

I contend the development poses a risk to threatened species and has not provided adequate wildlife corridors as per requirement of the PLC Guidelines.

The scale of the area proposed to be cleared and cumulative land clearing impacts in relation to the wider area.

As described the proposal in itself could have a significant impact on biodiversity if species which may occur on the land do in fact occur. I'm also concerned about the

chronic degradation of biodiversity associated with the numerous clearing applications in train, which are occurring in the absence of any strategic plan for biodiversity conservation or clearing.

This application does not stand alone as being environmentally acceptable. The main argument for mitigation of risk appears to be the claim that few other station owners have cleared their leased land yet. If every station owner did this then the NT would be left with a massively reduced woodland extent. It is clear that similar applications are coming in thick and fast and the Pastoral Lands Board has lost control of this process.

I contend there is no social licence or public benefit for the current laissez faire approach and the Pastoral Lands Board needs to engage with the public properly in a strategic discussion about land clearing at a regional scale rather than facilitating a death by a thousand cuts approach under the “simplified” pastoral land clearing process.

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 impossible to make comment on:

- Loss of stored carbon because the proposal does not even mention the loss of carbon storage; or
- Greenhouse gas emissions from planned fertiliser and stocking rates should also be included in emissions estimates;

As these are not addressed in the application.

However based upon statements in the paper
https://ris.cdu.edu.au/ws/portalfiles/portal/35423322/MTEM_25153_Law_R.pdf
Carbon stored in woodland (not soil) could be of the order 50 tonnes/hectare.

Hence clearing associated with this proposal of around 700 hectares could be of the 35,000 tonnes, which based on a low market price of $10 tonne for buying offsets, the value of this damage is $0.35M.

Given the pressure to make deep cuts in emissions now I reiterate this is an unacceptable proposal and this needs to be reflected in a sober public policy that is consistent with the scale of climate change threat. 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 massive carbon release; and, this benefit is not shared evenly.

The cost of offsetting carbon losses must be paid by the proponent.

Water balance changes and the potential for water contamination / pollution of wetlands, waterways and groundwater

The application identifies drainage depressions within the clearing area and also shows that drainage is towards a large seasonal wet area just to the south-west of the clearing proposal. This larger wetland is evident in the aerial photos but is not described and seems significant. I'm especially concerned about risks of contamination of this area associated with cotton farming.

Unsuitability of cotton farming and high water demand

I'm opposed to cotton farming as proposed because of the associated water demand and contamination risks. The application details that a very large water licence is being applied for, however I contend that cotton is a very water hungry product and a small industry will do great damage to our environment and take too much of our precious water for little benefit. I'm opposed to diversification of pastoral leases for this purpose.

I urge the Pastoral Lands Board to take responsibility for the broader implications of activities on pastoral lands on the Territory's natural environment.

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

An Abstract of Records is provided but this seems insufficient to determine whether sacred sites exist if a Sacred Sites clearance involving Traditional Owners attending the site has never been undertaken.

I note that there is a native title determination over the area and strongly believe there is a moral responsibility upon the Pastoral Lands Board to seek the Native Title Holders' approval for a change in land use on the land. This is especially so in the case of water hungry cotton farming as the Native Title holders the right to take and to use the natural water on those areas, except water captured by the holders of Perpetual Pastoral Lease No. 1198 was recognised in the decision Brown v Northern Territory of Australia [2013] FCA 1080. Their ability to access this water could be diminished by a large water licence.

Lack of assessment under the Environment Protection Act 2019.

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

The *Environment Protection Act 2019* places the responsibility on the proponent to refer the proposed action if it has the potential to have a significant impact on the environment or if it meets a referral trigger. As the applicant has not referred this application which details significant but poorly defined risks to the environment the Pastoral Lands Board should.

Thank you for considering my submission.

Sincerely

Jacqui Arnold