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9 August 2024

Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Pastoral Land Clearing Application – Newry Station, Victoria River Pastoral District, Portion 2675, Pastoral Lease 1114

I am writing to request that you reject the application to clear 1121.55 ha of native vegetation on Newry Station for "pastoral purposes – for improved pasture, fodder for grazing and supplementary feeding of cattle".

I am strongly opposed to this proposal on grounds that this is a very large proposal with severe impacts. These include:

A. Biodiversity impacts, specifically:

1. Risks to significant cracking clay habitat by the removal of perennial native grasses and introduction of tilling, fertilisers, pesticides and weeds.
2. Unavoidable and unacceptable risk to numerous EPBC act listed species like the endangered Gouldian Finch, Purple Crowned Fairy Wren and Red Goshawk, Mertens Water Monitor, Northern Quoll and vulnerable species like Sharp tailed sandpiper, Grey Falcon, Bilby to name but a few. Some of these species such as the plains adder may occur at the site and others such as the ghost bat may forage at the sit.
3. While the risks to all the above species are 1) not based on field studies and 2) unacceptable, I specifically challenge the assertion that the ghost bat is not impacted because of the lack of caves on the site. There are significant "breakaways and rocky ranges" within 2 km of the proposed clearing. These seem likely to contain suitable roosting sites. Studies of ghost bat habitat highlight that they forage a median of 1.9km from their day roost and preference foraging on productive plain areas with thin mature woodland over patchy or clumped tussock or hummock grass[1]. In short this site appears an ideal habitat for ghost bats. On top of the impact on ghost bat colonies at this location it is additionally concerning given the production line of applications on these grass plains on clay soils resulting in additional cumulative impacts on the species' prospects.

B. Impacts on waterways

[1] https://www.dcceew.gov.au/sites/default/files/documents/review-ghostbat-ecology-threats.pdf

1. Eutrophication (nutrient enrichment causing algal blooms) from fertiliser and cattle waste.
2. Use of herbicides and pesticides without any specific details of what will be used and there being no capacity to regulate this.
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

C. Cracking clay soils – These regions are already heavily under pastoral lease (e.g. >97% on the Mitchell Grass Downs) under and consist of vertisols which are of national significance and whose formation is contingent on deep rooted grasses and 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 which lack of offsets. 212,505 tonnes of carbon emissions are associated with the proposal and the costs associated with this being gifted to the applicant at the public and environment's expense. 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. Cultural impacts and risks to sacred sites. The application does not describe any consultation with Traditional Owners or Custodians about impacts on cultural values or archaeological 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 grass plains 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 vertisols – these values and loss of these values are not recognised https://www.nlc.org.au/uploads/pdfs/NERP_Ganalanga-Mindibirrina_IPA-PoM.pdf)

Furthermore the advice from the Heritage Branch included in the application appears not to have happened:

"The Heritage Branch advises the first stage of this process include engaging an archaeologist to produce a desktop assessment. This assessment can then determine more targeted physical survey areas. The targeted areas might include the proposed clearing locations that are close to waterways. Please ensure the Heritage Branch receives a copy of the desktop assessment prior to the survey beginning."

No physical surveys are reported.

CONCLUSION

This is a very large application. As a responsible decision maker it is simply unacceptable to continually wave this type of proposal through without proper field assessment and environmental referral. The Traditional Owners and Custodians must be consulted and the cumulative impacts on these cracking clay grass plains must be considered.

For the reasons cited 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.

Sincerely,

Jacqueline Arnold

CC
Dr Paul Vogel, NTEPA
Environment Centre NT
Northern Land Council
Department of Climate Change, Energy, the Environment and Water