Jacqueline Arnold
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NT 0870

7 June 2024
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Standard Pastoral Land Clearing Application – Powell Creek NT2094, Barkly Pastoral District

I am writing to request that you reject the application by Troy Settle, representing Consolidated Pastoral Company Pty Ltd to clear 4,340.5 ha of native vegetation for the production of "rain-fed forage sorghum production

I am strongly opposed to this proposal on grounds that the proposal:

1. Is not in the public interest and unapologetically seeks a small private benefit at an immense cost to the public in loss of ecosystem services, and carbon emissions;
2. Will adversely impact Lake Woods, a wetland of International Bird Significance, on the Australian Directory of Important Wetlands,
    a. via runoff contaminated with fertiliser, pesticides, nutrients and faecal contamination
    b. introduction of weeds
    c. locking off opportunities for strategic protection of Lake Woods and its immediate catchment;
3. Greenhouse gas emissions are enormous. The applicant holds multiple pastoral leases but it is being let off on its obligations to offset the first 500,000 tonnes of emissions on each property.
4. Puts at risk a range of iconic threatened species in an area that appears to be preferred habitat. It should be strategically conserved and and should be protected not degraded.
5. Is ethically outrageous as there does not appear to have been any consultation with local Aboriginal people, who I understand are generally unaware of this proposal, despite Lake Woods being of immense cultural heritage significance.
6. Given recent statements by the applicant's CEO this proposal could be an incremental step towards irrigated cotton production. Given its proximity to Lake Woods the company should be required to give binding assurance that this will never be the case.

Given the size, uncertainty, failure to consider groundwater issues and risk, this proposal must be assessed under the Environment Protection Act 2019.

1. **Proposal is not in the public interest and unapologetically seeks a small private benefit to the applicant at an immense cost to the public**

The application is deaf to the national context in which it is made. Unlike the pastoral lessee the concerns of most citizens are not whether this clearing can occur for the marginal benefit of a pastoral lessee but that:

A. Savannah ecosystems are collapsing,
B. Australia as a community desperately needs to reduce its atmospheric emissions and this increases them, without compensating the community for this shifted cost.
C. The site contains preferred habitat for an immense number of threatened flora and fauna species, such as the bilby(refer 4)
D. we are facing a biodiversity crisis, with the Federal Government making significant investments to "save" the native species that this area can support.

2. **Will adversely impact Lake Woods, a wetland of International Bird Significance on the Australian Directory of Important Wetlands,**

    a. **via runoff contaminated with fertiliser, pesticides, nutrients and faecal contamination**

The application outlines an intention to apply 100kg/ha DAP fertiliser. This represents approximately 400 tonnes of DAP fertiliser per annum. There is a real risk that this could be largely be washed into Lake Woods in a wet summer resulting in eutrophication. Additional exports of nutrients, turbid runoff and bacteriological contaminants would be associated with increased cattle numbers on the property.

Assessment this pastoral land clearing application under the Pastoral Lands Act, is not a suitable process to assess these risks**.**

    b. **introduction of weeds**

Introduction of environmental weeds - specifically sorghum which is proposed to be planted. 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. **locking off opportunities for strategic protection of Lake Woods and its immediate catchment**

Lake Woods is been identified by BirdLife International as an Important Bird Area (IBA), as well as being included in Australian Directory of important

Wetlands. This area is an important ecological refuge of immense significance. Prior to decisions on proposals to degrade sites such as this a strategic assessment of the potential to conserve these areas is needed.

3. **Greenhouse gas emissions are enormous. The applicant holds multiple pastoral leases but it is being let off on its obligations to offset the first 500,000 tonnes of emissions on each property**.

Self-explanatory – I am opposed to this as it shifts the costs of emissions onto the public and makes it even harder to reduce Australia's emissions as we face a global heating crisis of existential significance.

4. Puts at risk a range of iconic threatened species in an area that appears to be preferred habitat and should be protected not degraded

The EPBC protected matters report testifies the significance of this area as a refuge for listed species in a time of declining ecosystem resilience, due to climate change. Species such as greater bilby and night could and may occur in this area. It is especially important because of it proximity to Lake Woods.

5 Is ethically outrages as there does not appear to have been any consultation with local Aboriginal people, who I understand are by in large unaware of this proposal, despite Lake Woods being of immense cultural heritage significance.

Self-explanatory, an abstract of records from AAPA is insufficient. Genuine consultation resulting in informed consent and archeological surveys are needed.

6. Given recent statements by the applicant's general manager this could be an incremental step towards irrigated cotton production, given the proximity to Lake Woods the company should be required to give binding assurance that this will never be the case

Self-explanatory refer: https://www.abc.net.au/news/2024-03-21/henry-burke-new-cattle-president-ntca/103601748

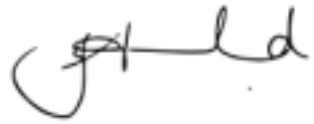
7. Given the size, uncertainty, failure to consider groundwater issues and risk, this proposal must be assessed under the Environment Protection Act 2019.

While I am firmly opposed to this proposal I consider that if the applicant wishes to proceed with this application it should in the first instance be subject to environmental impact assessment under the *Environment Protection Act 2019* and the *Environment Protection and Biodiversity Conservation Act 1999* (Cwth). The hand-written self-assessment is absolutely deficient – e.g. see aquatic ecosystems risks not being acknowledged despite proximity to Lake Woods a wetland of International bird significance.

Thank you for considering my submission.

Sincerely,

Jacqueline Arnold



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