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NT 0870

10 December
Pastoral Lands Board
Via 'Development Applications Online'

Dear Pastoral Lands Board,

RE: Vermelha PPL 1174 NT Portion 5130 Larrimah / Sturt Plateau Pastoral District

I am writing to request that you reject the application by Diep Nguyen, Managing Director of Vermelha PTY LTD to clear 4,018.9 ha of native vegetation at Vermelha Station.

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. Failure to consider impacts on cultural heritage
5. 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 Curlew Sandpiper, Red Goshawk, Gouldian Finch, Purple Crown Fairy Wren, Painted Honeyeater, Masked Owl, Northern Quoll and Ghost Bat. These species are associated with savannah woodland, others with wetland or waterway areas and the Ghost Bat with caves (sinkholes shown). There is no dedicated research into the occurrence of the species or design to protect them, rather the main mitigation for prevention of loss of species which could occur in woodland is appeal to the size of the subject land in relation to the extent of woodland across the NT.

The permit holder has not demonstrated the qualifications required 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 proposals of this nature, which are occurring without any strategic plan for biodiversity conservation in place.

This application does not stand alone as being environmentally acceptable and the main mitigation is that not many other station owners have cleared their land, yet. If every station owner did this then the NT will 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 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 4,000 hectares could be of the 200,000 tonnes, which based on a low market price of $10 tonne for buying offsets, the value of this damage is $2M.

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 cattle numbers yields a benefit

that is commensurate with the cost of this massive carbon release; and, this benefit is not shared.

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 highlights the occurrence of a waterway and wetlands (drainage depressions)in the plan area and two sinkholes which the photos show are heavily vegetated. While these are not to be cleared I'm concerned that the proposal will cause nutrients and sediments to enter these and the underlying groundwater. Weeds and edge effects would be expected to damage waterway and wetland vegetation. I'm also concerned that the extra stock associated with the clearing will damage these fragile areas.

Lack of an authority certificate granted under the Northern Territory Aboriginal Sacred Sites Act 1989.

No evidence that an authority certificate has been obtained, or an Abstract of Records provided. Sacred sites are protected under the *Northern Territory Aboriginal Sacred Sites Act 1989.*

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 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