



2 November 2021

To

Executive Officer
Pastoral Land Board

By Email to:

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Copy to:

Minister Eva Lawler: Minister.Lawler@nt.gov.au

Northern Territory Environment Protection Authority: NTEPA@nt.gov.au

To Whom it May Concern,

Consolidated Pastoral Company Pty Ltd – Application to Clear Pastoral Land (s38(1)(h)) on Newcastle Waters Station

The Environment Centre NT (**ECNT**) is the peak community sector environment organisation in the Northern Territory of Australia, raising awareness amongst community, government, business, and industry about environmental issues, assisting people to reduce their environmental impact, and supporting community members to participate in decision-making processes and action.

Thank you for the opportunity to provide a comment on the application (**Application**) of Consolidated Pastoral Company Pty Ltd (**the proponent**) to the Pastoral Land Board (**PLB**) for a permit to clear Pastoral Land under section 38(1)(h) of the *Pastoral Land Act 1992 (NT)* in respect of Newcastle Waters Station Pastoral Lease 947.

In summary, ECNT submits that the Application should be refused on the basis that the Application is deficient in key respects. Alternatively, the proposal should be immediately referred for assessment under the *Environment Protection Act 2019 (NT)* on the basis that it clearly meets the threshold of having the potential to have a significant impact on the environment.

In particular:

- a. despite the quantity of greenhouse gas emissions from the project (which ECNT estimates to be in the vicinity of 22 000 tonnes of carbon dioxide equivalent)¹, this impact is not mentioned, nor are any offsets proposed to mitigate these emissions. This clearing proposal alone could produce emissions equivalent to 0.18% of the NT's total greenhouse gas emissions in 2019.² This is a significant and unacceptable amount of emissions for a simplified project, at a time when the NT Government needs to be reducing emissions to play its part in addressing climate change. It is critical to consider these emissions in combination with all land clearing permits that have been issued or are under assessment in 2021 the potential emissions produced are in excess of approximately 1.5 million tonnes approximately 13.6% of the NT's total greenhouse gas emissions in 2019. The current rate of clearing in the Territory is directly inconsistent with the NT Government's greenhouse gas emissions target of net zero emissions by 2050;
- b. the Application contains no assessment of the possible impacts on the water balance from the proposed land clearing, which might lead to an increase in salinity.³ It makes reference to salinity at Down Plains on Hayfield Station and fails to address salinity levels at the site of proposed clearing. Increased salinity is a well-known impact from land clearing, and may destroy habitat for native species within and in the vicinity of the Application area;
- c. the proposed clearing will contribute to the continuing collapse of ecosystems⁴ as it will involve the destruction of habitat for native animals, and of these animals themselves (through ploughing). The application has disregarded the requirements of the land clearing guidelines and has not included a wildlife corridor nor developed an alternative approach. Regions of Northern Australia are in the midst of an unprecedented mammalian extinction.⁵ As habitats become increasingly fragmented, populations become more vulnerable to other threats, such as predation by feral species and destructive fires, and lose the ability to recolonise suitable habitat. A comprehensive and evidence-based

¹ Estimated using the figure of 47 tonnes of CO₂ equivalent emissions per hectare from tropical grasslands under management resulting in improved moderately overgrazed pasture from L Verchot et al. (2006) "IPCC Guidelines for National Greenhouse Gas Inventories" IPCC 3.113. https://www.ipcc-nggip.iges.or.jp/public/gpplulucf/gpplulucf_files/Chp3/Chp3_4_Grassland.pdf

² See the 2018 Greenhouse Gas Inventory for the Northern Territory from the Australian Greenhouse Emissions Information System website: <https://ageis.climatechange.gov.au/>

³ See for instance: Williams et al. 1997. "Tree clearing and dryland salinity hazard in the upper Burdekin catchment of north Queensland". *Soil Research* 35(4):785-802.

⁴ Bergstrom et al. 2021. "Combating ecosystem collapse from the tropics to the Antarctic." *Global change biology* 27(9):1692-1703.

⁵ Fitzsimons, James, Sarah Legge, Barry Traill, and John Woinarski. 2010. *Into oblivion? The disappearing native mammals of northern Australia*. The Nature Conservancy.

- assessment of the impacts of the proposed clearing on native animals and the ecosystem as a whole is required, not the tick box answers given in the Application;
- d. there are sacred sites in the vicinity of the Application area. An authority certificate granted under the *Northern Territory Sacred Sites Act 1989 (NT)* should be a mandatory requirement for the entire proposed area of clearing and surrounding vicinity.
 - e. there is limited information to guide the PLB's assessment of the cumulative impacts of the Application together with other impacts in the bioregion of Mitchell Grass Downs (eg including but not limited to other water licence applications, non-pastoral use permits, and feral animal impacts).

Land clearing is a fundamental pressure on the environment. Land clearing causes the loss, fragmentation and degradation of native vegetation, and a variety of impacts on soils (eg erosion, salinity, loss of nutrients and acidification) and disrupts essential ecosystem processes.⁶ Threats to biodiversity from land clearing and habitat loss are one of the greatest threats to threatened species in Australia, and to the environment more generally.⁷ Recent research shows that the whole tropical savanna ecosystem is collapsing and points to land clearing as one of the causes of ecosystem collapse.⁸

ECNT is extremely concerned by the increase rate of land clearing applications and approvals in the Northern Territory, particularly in the savanna regions. The PLB considered applications for ~21,700 hectares of land clearing in 2020, more than double the area approved for clearing in 2019, and more than ten times the area approved in 2018. As of 3 November 2021, The Pastoral Land Board has approved or is the process of assessing ~16 400HA of clearing. ECNT understands that this rate of applications is likely to continue if not accelerate. The NT Farmers Association has revealed plans for 168,000 hectares of farming development across the Northern Territory, which will not only increase the Northern Territory's greenhouse gas emissions significantly, but also require millions of litres of the Northern Territory's groundwater and surface water, as well as exacerbating the impacts of climate change (through increased heat and changes to the water table from clearing and irrigation).

⁶ State of the Environment Australia 2016. "Land Theme: Regional and landscape-scale pressures: Land clearing." <https://soe.environment.gov.au/theme/land/topic/2016/regional-and-landscape-scale-pressures-land-clearing>

⁷ Neldner et al. 2017. *Scientific review of the impacts of land clearing on threatened species in Queensland*. Queensland Government, Brisbane. https://environment.des.qld.gov.au/data/assets/pdf_file/0020/90272/land-clearing-impacts-threatened-species.pdf

⁸ See above n 4.

The Pastoral Land Act is not fit for purpose to protect the Northern Territory's pastoral estate from habitat fragmentation and damage on the vast scale that is underway, and being proposed. The Northern Territory as a political jurisdiction is completely unprepared to respond to the environmental threats posed by the proposed large-scale agricultural development, with piecemeal regulatory approvals that frustrate any attempts to strategically assess the likely cumulative impacts of these developments instead the norm. Urgent regulatory reform is needed so that landscape scale integrated protection and management of the Northern Territory's unique savannas and freshwater systems can occur. ECNT seeks an urgent meeting with the Pastoral Land Board to discuss our concerns regarding increasing land clearing across the Northern Territory.

ECNT calls on the Northern Territory Government to introduce a new regulatory system for protecting the Territory's unique biodiversity that will require bioregional planning and management of the Territory's ecosystems, including setting limits for land clearing on an ecosystem scale and the requirement of offsets for all greenhouse gas emissions that result from land clearing. In the interim, the Northern Territory Government should require all land clearing applications, including this one, to be referred for assessment under the Environment Protection Act 2019.

Yours faithfully,



Shar Molloy
Co-Director
Environment Centre NT



Kirsty Howey
Co-Director
Environment Centre NT