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15th January 2013

Referral Business Entry Point, EIA Policy Section (EPBC Act)
Approvals and Wildlife Division
Department of the Environment, Water, Heritage and the Arts
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Canberra ACT 2601
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**Ref 2013/6710 - VDL Company Dairy Farm expansion on the Woolnorth property
North West Tasmania.**

Dear Sir or Madam

We write about the VDL Company's proposal to rapidly and, in essence, immediately clear the large area (in Tasmanian terms) of 1,818 hectares of native vegetation on the property "Woolnorth" owned by VDL and the proposed conversion of this land to dairy pasture.

We have considered the voluminous amount of information presented both on the EPBC website and the VDL website about this matter. We consider the information present may not adequately describe the problem we refer to in this letter.

We have been aware of the VDL proposal and the extensive clearances already taking place in the northwest corner of Tasmania by VDL and are increasingly concerned and alarmed. We consider this to be a matter of national environmental significance and that the land clearance of habitat of listed species would, absolutely, be against the public interest.

We believe the matter should be regarded by the Commonwealth under EPBC as a Controlled Action.

It seems that it is not disputed that the land in question is very, very important habitat for the Spotted Tailed Quoll (*Dasyurus maculatus*) and also for the Tasmanian Devil (*Sarcophilus harrisii*) including those that are claimed to be disease free. Both of these species are Commonwealth listed species and rightly so. However we dispute the adequacy of the current Commonwealth listings.

We believe that in the context of the rapid and catastrophic decline of the Tasmanian Devil especially, the proposed clearance on VDL is a matter of national significance.

We assert there will be a number significant impacts on the listed species if the proposed clearance goes ahead that will not be mitigated adequately or at all by the illogical action

of reserving what is left of the natural environment after VDL has massively intensified and expanded its operations. The attempts to avoid the impacts are obviously not sufficient.

This is a proposal, which implemented, would unwisely and irresponsibly drag at least two very important species of unique carnivorous marsupials towards extinction. The Devil is the world's largest remaining carnivorous marsupial ever since the Thylacine was intentionally obliterated in Tasmania.

Other important threatened species and endangered species, nationally listed and present on the site should also be more carefully investigated.

What an outrageous proposition, that a foreign owned corporation should, for purely financial motivation (as has been admitted), embark upon the wrecking of a marvellous and ecologically important part of a wonderful corner of Australia and in the process ensure that two important carnivorous marsupials are driven further towards extinction. Such endangerment should be a crime.

Please let us remind you that there are no adequate land clearance controls in Tasmania and still no land clearance legislation. Tasmania is still allowed to lag behind the other states in this regard whilst land clearance in Tasmania continues virtually unabated.

Australia must be proactive in protecting its unique fauna from developers who naturally have less interest in the national importance of our unique environment and iconic wildlife. We call upon the Department of the Environment, Water, Heritage and the Arts and its Commonwealth Minister to reject the proposal to obliterate of 1,818 hectares of native vegetation which includes a substantial portion of important habitat for disease-free Tasmanian Devils and which has long been acknowledged as strong hold for the Spotted Tailed Quoll (STQ). One can see that fact by looking at the RFA's CRA of 1996/7 period where the area was identified. Tasmania has about 50% of Australia's STQ's and the Commonwealth has failed to finalise a recovery plan. A draft has been the best it can do.

We provide the Report 7A to the Independent Verification Group (which seemingly has largely been overlooked) which deals with both the Spotted Tailed Quoll (*Dasyurus maculatus*) and the Tasmanian Devil (*Sarcophilus harrisii*) as well as the Eastern Quoll. Please note how little of the current forest reserve proposals consider this area of the King Bioregion.

We note Minister Bourke has been keen on the Tasmanian Forest Agreement but not withstanding it is criticised for having insufficient focus on protecting biodiversity. The VDL proposal to clear 1,818 hectares of native vegetation is an excellent case in point being private land containing a plethora of threatened and endangered species.

The foreign owned company, VDL, simply wish to knock down a swag of high conservation value natural environment with the Commonwealth's blessing. They also wish to find other investors for their project. That basically means that foreign investors such as possibly the Chinese will become the principle beneficiaries of destroying the significant natural environment of NW Tasmania. The whole proposition is against the public interest. The proposal for more land clearance should be rejected.

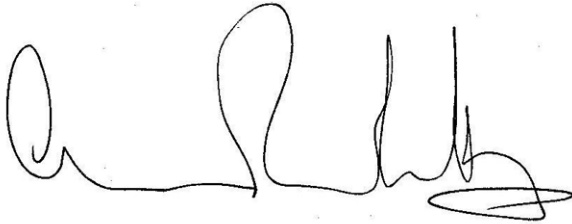
Finally we note that the 16th January is the last day for submissions with the referral "Ref 2013/6710 - VDL Company Dairy Farm expansion on the Woolnorth property North West Tasmania" to the EPBC being listed on January 2nd 2013. We are concerned that

the time of year in which this matter was referred is one where such a referral could easily be overlooked, being just after Christmas. Many people are on holidays and I suppose the proponent is seeking to take advantage of that fact. We expect you will receive few submissions as a result. We consider it should be readvertised

The matter should be listed as a Controlled Action. We would make further representation on this matter. Ultimately the project should not go ahead.

We seek a response to our submission please.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Andrew Ricketts'. The signature is fluid and cursive, with a large initial 'A' and a distinct 'R'. It ends with a horizontal line and a small loop.

Andrew Ricketts
Convenor

The Environment Association (TEA) Inc is a not for profit, volunteer based, regional environment community association and a stakeholder in land use and biodiversity processes. TEA has a long-term interest in environmental and social outcomes in our region, Northern Tasmania, particularly in forest conservation and forestry and threatened species issues. The Environment Association has worked in the public interest since its inception in 1990. As one of only two rural based environment centres in Tasmania, The Environment Association (TEA) is a long-term independent stakeholder in any resolution to the complex and divisive forestry conflict in Tasmania.

TEA is not represented by any other conservation organisation, formally or informally, including the three ENGO conservation organisations that signed the Tasmanian Forest Agreement.