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Mr Adam Rigby
Manager
State Development Areas
Dept. of State Development, Infrastructure and Planning

sdainfo@dsdip.qld.gov.au

19 December 2014

Dear Mr Rigby

Re: Moray Power Project MCU2014/019

On behalf of North Queensland Conservation Council (NQCC) I would like the following comments to be taken in account in relation to the above-named matter.

NQCC is the regional conservation council covering north Queensland. Further information about the organisation can be found on our [website](#).

NQCC is concerned about the paucity of information contained in the Environmental Assessment Report. There can be no confidence in decisions based on the documentation and detail provided.

Cumulative Impacts (4.4.1) are incorrectly defined as 'those resulting from the incremental impact of the proposed Project when added to other existing, planned or reasonably predictable future projects'. I suggest that the 15-year old reference is out-dated and of little use. It would be far preferable to use the definition provided in in 2010 CUMULATIVE IMPACTS - A GOOD PRACTICE GUIDE FOR THE AUSTRALIAN COAL MINING INDUSTRY. Centre for Social Responsibility in Mining & Centre for Water in the Minerals Industry, Sustainable Minerals Institute, The University of Queensland:

Cumulative impacts are the successive, incremental and combined impacts (both positive and negative) of an activity on society, the economy and the environment. They can arise from the compounding activities of a single operation or multiple mining and processing operations, as well as the interaction of mining impacts with other past, current and future activities that may not be related to mining.

It is apparent that cumulative impacts are far greater than the limited impacts referred to in the Environmental Assessment Report (EAR) in question.

On this basis alone, the EAR must be seen as an inadequate basis on which to make any decision on this matter.

However, the EAR includes specific examples or where the concept of CIA has been treated with total lack of professionalism – and indeed in a cavalier manner. I refer, for

example to s6.4.4.2. This section dismisses any cumulative impact on surface water with unsubstantiated statements such as 'However, given the Project and CCMP design considerations it is considered likely these impacts will only be minor' and 'It is considered that a carefully designed water management system, integrating all facets of the various activities, can be implemented to minimise or eliminate the potential effects of the Projects' operation on local as well as regional surface water values'.

Such vague and aspirational comments are completely inadequate: The EAR should be rejected on the grounds of poor quality.

Section 6.5.4.3 refers to the cumulative impact on the water table. Again, this section is based on unsubstantiated surmise.

The proposal is for the construction of a 99ha coal ash slurry pit sufficient to Hold 30 years of ash, with all the associated groundwater risks that are now being legislated against in the US.

Risk Analysis

The risk analysis undertaken for the project remains a black box. It is unclear how impacts and risks were identified and quantified. There is no indication of how the process was undertaken or by whom.

EMPs

Comments such as 'It is assumed that the ornamental snake will be addressed under (EM) plans' are indicative of the lack of commitment to a rigorous EAR. The ornamental snake, listed as vulnerable under the EPBC Act, stands to lose 1905 ha of habitat.

Climate change

NQCC contends that the days of new coal-fired power stations in Queensland (or anywhere) are past. The world has accepted that the burning of fossil fuels is putting the planet on a trajectory to a changed climate that will have overwhelming impacts socially, environmentally and economically. There can be no valid argument for this proposal in terms of ecologically sustainable development, specifically the concept of intergenerational equity.

Time prevents detailed comment on this EAR. Suffice it to say that it is totally inadequate. Despite the pressure to rush through each and every resource development application that is thrown up, please consider the long-term ramifications of indiscriminate approval.

Sincerely



Wendy Tubman
Coordinator