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The Coordinator-General  
Proposed Galilee Basin State Development Area  
State Development Areas Division  
Office of the Coordinator-General  
PO Box 15517  
City East Qld 4002

**Email:** [sdainfo@dndip.qld.gov.au](mailto:sdainfo@dndip.qld.gov.au)

Dear Mr Broe

**Re: The draft Galilee Basin State Development Area (SDA) proposal**

This submission is made on behalf of North Queensland Conservation Council (NQCC), the peak regional environmental body for the region from Bowen to Cardwell and from the Reef to the Northern Territory border. Our mandate is to protect the environment of the region, especially from development that is not environmentally sustainable.

In relation to the draft Galilee Basin State Development Area proposal, we would like the following comments to be taken into account.

There is considerable uncertainty as to the future of the coal export industry in Australia. This is related to, *inter alia*, increasing international recognition of the contribution of fossil fuels to climate change and consequent anticipated reduction in use; the efforts of China to decrease carbon emissions, for reasons of human health; and the financial fragility of the two remaining coal companies involved in the proposed Abbot Point development.

This uncertainty has already resulted in the withdrawal of Rio Tinto, BHP and Anglo American Coal from involvement in the proposed expanded Abbot Point coal export facility.

While it is recognized that infrastructure projects have a long lead-time, the long-term future for the coal industry is, according to virtually all qualified commentators, bleak. To push ahead with the development of an SDA related exclusively to the proposed Abbot Point port in such circumstances would suggest an unfortunate lack of forethought and economic wisdom.

To invest in a dying industry, particularly one that relies on large taxpayer subsidies to survive, makes no economic or political sense.

Furthermore, the impacts of the developments proposed in the SDA are not without significant social impacts. These impacts are related to noise and dust pollution, stress, loss of amenity and loss of economic wealth as landholders and those in the vicinity experience a decrease in the value of their properties.

Long-term environmental risks also arise from damage to water resources, erosion and vegetation clearing.

Before any decisions on this proposal are made it is strongly argued that an independent, peer-reviewed cost/benefit analysis, with proper attention to long-term monetary and non-monetary costs, cumulative impacts and the full panoply of economic, social and environmental variables, be undertaken.

Such an analysis would, of course, involve assessment of risks and the full review of the alternative sites being considered.

Such an approach would be in line with the obligations on government to act with the highest level of care on behalf of the community it serves, including those most directly involved, those with a serious interest in the issues, and the taxpayer.

We note that Minister Seeney has committed to continuing discussions until such time as a solution satisfactory to all stakeholders is achieved. We commend this commitment and look forward to such an outcome.

Yours sincerely

A handwritten signature in grey ink, appearing to read 'Wendy Tubman', written in a cursive style.

Wendy Tubman  
Coordinator