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7 September 2015

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To whom it may concern,

Supplementary submission from NQCC on the Draft EIS for China Stone Coal Project

North Queensland Conservation Council (NQCC) is the regional conservation council covering the area from Bowen in the south to Cardewell to the north and from the Reef to the NT border. Established in 1974 (and incorporated in 1984), NQCC acts as the 'voice for the environment in the north'.

As Coordinator of NQCC I am authorised to make this submission in its behalf. Overall, NQCC contends that the EIS provided for the China Stone Coal Project (the Project) does not adequately assess the impacts of the Project and/or demonstrates unacceptable impacts. Because of this, the Project should be refused.

Further to the submission made earlier on this day, 7 September, I submit that the treatment of offsets in the EIS is totally inadequate.

The entire chapter in the EIS on Offsets (Appendix H) is deemed Commercial-in-Confidence and so is not provided.

Where the issue of offsets appears in specific-topic chapters, it is cursory in the extreme, simply providing a list (the same list for each issue it appears) of the nature of the information contained in Appendix 7 (e.g. 'a proposed mechanism', 'a proposed management strategy', and 'a description of the objectives of the offsets'). It then refers the reader/analyst, 'for further detail', to the empty Appendix H.

The treatments within the specific-topic chapters of the EIS appear (at least in the case of 'Terrestrial Ecology' and 'MNES') are identical apart from an additional 40 or so words for terrestrial ecology.

There has been nothing but the most cursory of attempts to address the matter of offsets in relation to the cumulative impacts of the Project; and, as detailed in NQCC's earlier submission, the cumulative impact assessment is incomplete and inadequate. As a result, it is not possible to identify the level and type of offsets required.

The non-transparent treatment of offsets is insulting to the public and makes fulsome comment impossible.

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

Wendy Tubman
Coordinator