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Re: Abbot Point Growth Gateway Project 2015/7467

North Queensland Conservation Council (NQCC) is the regional conservation council covering that area from Bowen to Cardwell and from the Reef to the border between Queensland and the Northern Territory.

NQCC was established in 1974 and incorporated in 1984. For 41 years it has been acting as the voice for the environment in north Queensland, educating the community and contributing to the development of good policy for the environment.

On behalf of NQCC, I submit the following comments in relation to the referral of Abbot Point Growth Gateway Project 2015/7467.

1. Given the structural downturn in the Australian coal industry, the very real possibility of any expanded facilities at Abbot Point becoming stranded assets, the inevitable damage to the Great Barrier Reef World Heritage Area region and the fragile nature of the onshore and offshore areas, NQCC argues that the proposal cannot be justified. NQCC believes that the proposed action is clearly unacceptable and should be rejected. The uncertainty of the impact of the dredging (as identified in the GBRMPA/AIMS Dredge Synthesis Report) would add the weight of the precautionary principle, a further reason for deeming the proposal to be clearly unacceptable.
2. If the project is not deemed to be clearly unacceptable, NQCC is strongly of the belief that the controlling provisions should be those identified in the referral – namely World Heritage values, National Heritage places, Listed threatened species and communities, Listed migratory species and the Great Barrier Reef Marine Park.

3. If the proposal were to be accepted as a controlled action, NQCC would argue that it be subject to assessment by way of an Environmental Impact Statement. The fact that other sites in the vicinity have been the subject of previous review, means only that an EIS would be less arduous to undertake – not that an EIS is not required. Given the ecological significance of the area in terms of the controlling provisions listed above, and the current concern of UNESCO about the status of the Reef, it is essential that the Federal government concur with the State's commitment to assessing the project at the EIS level.

4. Given the evidence that is now being obtained with respect to the adequacy and accuracy of documentation provided to the Federal Government for the purposes of assessing Adani's Carmichael mine and rail project, it is important to expose the documentation provided for this gateway project, itself dependent on information provided by Adani, to rigorous examination.

The unacceptability of the earlier Adani information was revealed during the current Land Court case into the project. Examples of inaccuracy and inadequacy include:

(a) An Adani expert witness admitted under oath that the survey of a threatened and endangered species (the black throated finch) was inadequate and that Adani 'didn't have a clue' as to the likely effectiveness of its proposed offset;

(b) An Adani expert witness admitted that the number of direct and indirect jobs to be created in Queensland by the project was not 10,000 (as repeatedly claimed, including in the EIS submitted to the Federal government) but 1206.

5. Given the Federal and State appreciation of the importance of and commitment to Cumulative Impact Assessment, as noted in the Strategic Assessment of the GBRWHA that was undertaken at the behest of the World Heritage Committee, it is essential that, should the proposal continue to assessment, it be considered as a cumulative project. It is apparent from the referral documentation that the proposed action is part of a larger action. Accordingly, in order to comply with Australia's commitment to the WHC, it is vital that the larger action be assessed.



Wendy Tubman
Coordinator