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Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601

Email:

Proposed Action: Alpha North Coal Mine Project - Galilee Basin Queensland

Reference Number: 2018/8189

To whom it may concern,

I am writing on behalf of North Queensland Conservation Council, the voice for the environment in North Queensland with over 1500 members and supporters. Thank you for the opportunity, under EPBC section 74(3), to comment on whether or not the proposed action should be assessed under the *Environment Protection and Biodiversity Conservation Act 1999 (Cth)* ("EPBC Act").

In summary, our submission states that:

- (a) The proposed action will have a significant impact on water resources, including uncertain impacts on spring systems within the Galilee Basin
- (b) The indirect impacts to World Heritage Areas should be included in the EPBC assessment because of the resulting carbon emissions from the project and the increased shipping in World Heritage Areas
- (c) Listed Threatened Species and Communities will be impacted significantly, by the proposed project and by the cumulative impacts of a further eight proposed mine projects within the surrounding area of the proposed action
- (d) There is a need for the EPBC Act to routinely incorporate cumulative impact assessment into the EIS process, and this proposed action is no exception.

1. Water Resources

The proposed action is located on the edge of the Great Artesian Basin and within the Queensland's Galilee Basin. Both feed into groundwater dependent ecosystems in the region. The proponent has acknowledged that there are likely to be significant impacts to groundwater. However, the referral does not include potential impacts to the Yukunna Kumoo Springs Complex and Hector Springs Complex, which are located within a short distance of the proposed action footprint.

A mere 200 metres from the proposed action is the eastern part of the Doongmabulla Mound Springs Nature Refuge, which contains the magnificent Doongmabulla springs. There is uncertainty about the connectivity between these springs and groundwater levels of the Galilee Basin. In the absence of a

hydrogeological study, it is not possible for the proponent to claim that there will not be impacts on these springs or other parts of the system. The water resources at stake here are of great importance to the region, agriculture and to the maintenance of the health of ecological systems. For example, the springs are also a refuge for numerous species in need of water during times of drought.

The proposed action would result in the take and diversion of surface- and groundwater resources. Furthermore, water resources could be affected by surface subsidence and potential cracking of aquifers underground; new roads and rail may intersect watercourses and drainage lines; and pollution releases may affect water quality. The scale and impacts to water resources of this proposed action alone, and in combination with the further eight proposed mines in the Galilee Basin, could be catastrophic.

2. Impacts to World Heritage

The proponent does not make reference to impacts on World Heritage Areas, despite likely indirect impacts to the Great Barrier Reef. The EPBC Act itself does not refer to climate change. However, it can be reasoned that in order to protect threatened species and other Matters of National Environmental Significance (MNES), consideration of human-induced greenhouse emissions is essential. The full potential greenhouse emissions resulting from this mine (power generation by the export country using coal products from the Mining Area North and Mining Area South of the proposed action) is 170mtpa, 32% of Australia's entire emissions in the year 2016/17. NQCC maintains that the full greenhouse emissions resulting from this proposed action need to be assessed under the EPBC Act, as it is a major threat to the values of the Great Barrier Reef World Heritage Area. There are sufficient mechanisms within the EPBC Act to ensure climate change impacts can be included in the assessment of the proposed action.

The Great Barrier Reef has been impacted by climate change already, with two severe coral bleaching events. In 2016 and 2017 half of all the shallow water corals in were drastically affected by two back-to-back marine heatwaves. Mining and burning coal is the main driver of climate change in Australia. Approval of this mine will also go against Australia's international obligations under the Paris Climate Agreement to limit global warming to well below 2 degrees above pre-industrial levels and to pursue efforts to limit warming to 1.5 degrees.

Further to this point, are the indirect impacts to the Great Barrier Reef World Heritage Area caused by increased shipping. The proposed action will produce coal for export that is shipped from ports located within the World Heritage Area. The risk of ship strikes, known to kill or injure animals that contribute to the Reef's world heritage values, including whales, turtles, and dolphins, also increases. Species that must surface to breathe are at high risk of ship strike, including the *highly vulnerable* Indo-Pacific humpback and Australian snubfin dolphin species. The feeding, breeding and behavioural patterns of vulnerable species can also be disrupted by the noise and light pollution from the movement of ships through the Great Barrier Reef.

Industrial shipping also carries the risk of accidents or spills of pollutants within the World Heritage Area that may impact its world heritage values. The world heritage values of the Great Barrier Reef are deteriorating and the proposed action will have significant impacts on the world heritage values of the Great Barrier Reef World Heritage Area. It is essential for this proposed action to be assessed with particular consideration of the indirect and cumulative impacts on World Heritage Areas.

3. Listed threatened species and ecological communities

The Referral identifies a number of listed threatened species, ecological communities and migratory species that are likely to be impacted by the project. It should be noted that critically endangered species are species that can sustain no further loss and are at the brink of extinction, and, as noted by the Senate Inquiry into Biodiversity Offsets in 2013, projects impacting on critically endangered ecological communities and species, are not suitable for offsets and therefore developments should not be allowed to occur where critically endangered species exist. It should also be noted that some species' survival relies on the water resources previously mentioned, such as the spring systems within the Galilee Basin. These factors need to be considered, and in combination, in order to fully capture the environmental values and systems resilience of the area of the proposed action.

1. Cumulative Impact Assessment

The proponent has made no mention of cumulative impacts in the referral. The scale of the proposed action, the further eight mega-mine projects proposed within the Galilee Basin, the potential climate warming that would result and the link to the Great Barrier Reef through shipping activities, should require cumulative impacts to be accounted for in the environment impact assessment.

In conclusion, the available information demonstrates that the proponent has failed to conduct its own assessment of impacts on matters of national environmental significance that the proposed action would impact: threatened species and ecological communities; water resources; and, World Heritage Areas. Also, the referral should include climate change impacts and commitment for cumulative impact assessment to be undertaken. Accordingly, the Minister should require the proponent to submit a revised referral document, and require the proposed action to undergo assessment under the *Environment Protection and Biodiversity Conservation Act 1999*.

Please do not hesitate to contact me if you have any questions regarding this submission.

Yours faithfully,

A handwritten signature in blue ink that reads "Tarquin Moon". The signature is written in a cursive, flowing style.

Tarquin Moon
Campaigns Manager