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The Coordinator-General
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Coordinated Project Delivery
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Dear Coordinator-General,

North Queensland Conservation Council requests that the following comments on Waratah Coal's Supplementary Environmental Impact Statement (SEIS) for its proposed China First/Galilee Coal Project be taken into consideration.

Fundamentally, NQCC opposes the establishment of the mine in its current location for reasons that include the following.

Groundwater

The proposed mine would be located in the semi-arid Desert Uplands bioregion, where the existing towns and grazing industry are dependent on groundwater. According to the SEIS, the mine would result in a *permanent lowering* of groundwater in the area (Appendix 43, p54). However, the full effect of this cannot be gauged, because the analysis of groundwater recovery did not take into account the other mines proposed nearby (Appendix 43, p40) in any cumulative analysis.

At a time of great climate change-driven uncertainty as to the future rainfall in Australia, it is imperative that the precautionary principle be brought into play on this issue if the community and environment of Australia is not to suffer permanently for the sake of a short-term financial gain.

Offsets

The proposed mine would result in the destruction of the 8000 hectare Bimblebox Nature Refuge, a protected area that is part of the National Reserve System and is listed as a conservation area of State Significance in Queensland. The proponent has proposed to 'offset' the loss of Bimblebox at a ratio of 1:2 (Appendix 35, p10), but there is widespread international agreement that offsetting protected areas should never be allowed.

NQCC notes that the SEIS proposes totally clearing and mining land that meets the definition of "critical habitat" and which has been classed as a high value protected area within the nation's National Reserve System of protected areas. The Coordinator General must uphold the Queensland government's promise of protection in perpetuity for Nature Refuges and all conservation areas.

NQCC supports and concurs with the work of Patricia Julien from the Mackay Conservation Group in relation to offsets.

In the SEIS the land is treated as if it has no protected status; in fact it is classed as an IUCN Class VI protected area as a Queensland government nature refuge under the Queensland Nature Conservation Act 1999 and an IUCN Class IV protected area under the Australian government's EPBC Act.

In particular, NQCC notes the IUCN principle that only those areas where the main objective is conserving nature can be considered protected areas; this can include many areas with other goals as well, at the same level, but in the case of conflict, *nature conservation will be the priority.*

Climate Change

One of the most significant impacts from the China First mine would be the emissions from the coal. The projected annual output of 40 million tonnes of saleable coal would amount to 86 million tonnes of CO₂ every year. Over the life of the mine, over 2 billion tonnes of CO₂ would be produced from burning the mined coal – equivalent to almost four years of Australia's current total annual emissions. It is a major failing that Scope 3 ('indirect') emissions were not required as part of the Terms of Reference for this project, and this must be revised as a matter of urgency. This is of utmost importance especially to the Great Barrier Reef World Heritage Area, through which the coal from any mine in the Galilee Basin would be exported.

AIMS research has shown that, over the last 27 years, half of the reef's coral that was there when the GRBWA was listed, has died. The Great Barrier Reef Marine Park Authority, back in 2009, identified climate change as the greatest threat to the GBR. It is universally scientifically accepted that the burning of fossil fuels is one of, if not the, most significant contributors to climate change. Is it possible for the dots to be more clearly aligned? By exporting coal for burning we are killing the Great Barrier Reef.

UNESCO and IUCN have, just this week, recommended to the World Heritage Committee that the GRBWA be placed on the 'World Heritage In Danger' list. Scientists are saying that they expect the reef as we know it to be gone in a mere 20-30 years. The situation is critical. Continuing to allow the mining of fossil fuels in Australia, to the economic benefit of a few and the economic cost to many in the non-mining industries at the expense of the GBR, is unthinkable. The person reading this submission is one of the people responsible for addressing this situation. Whoever you are, NQCC asks you to do your utmost to ensure that the GBR is not lost to future generations.

Economics

Without a full cost-benefit analysis, it is impossible to determine whether or not the benefits from the proposed China First Project outweigh the significant social, economic and environmental costs. It is a major failing that a cost benefit analysis was not required as part of the Terms of Reference for this project, and this must be revised as a matter of urgency. It is also alarming that the proponent has withheld the SEIS Revised Economic Modelling results (Appendix 32) due to it containing 'confidential commercial information'. The local and state-wide economic ramifications of the project are of key interest to the public, and the information should be made available for scrutiny.

The new Terra Nullius

It is not too far-fetched to compare the current situation in Australia, in which the resource industry is able to walk on to the land held, used and cared for (often for generation) by others, to *Terra Nullius*, a system described by the Council for Aboriginal Reconciliation as one in which '*The colonisers acknowledged the presence of Indigenous people but justified their land acquisition policies by saying the Aborigines were too primitive to be actual owners and sovereigns...*'

Change 'primitive' to 'committed to the care and protection of the land' and we see what is happening on Bimblebox and throughout much of Australia. In years to come, this whole-scale handover of our natural resources to the dying fossil fuel industry will be a cause for shame and regret.

The above are some of the serious problems with the proposed China First Project. On their own they warrant refusal of the project, and they would only be exacerbated by the cumulative impact from the multiple mega mines planned for the Galilee Basin.

They demonstrate the failure of the supplementary information to address the concerns expressed about the Environmental Impact Statement.

Yours faithfully

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

Wendy Tubman
Coordinator

6 May 2103