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To whom it may concern,

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.

Facts and Circumstances relied on in support of NQCC's arguments

1. Cumulative impact

Cumulative Impacts: a good practice guide for the Australian coal mining industry¹
notes:

Cumulative impacts are the successive, incremental and combined impacts of one, or more, activities on society, the economy and the environment. Cumulative impacts result from the aggregation and interaction of impacts on a receptor and may be the product of past, present or future activities. Cumulative impacts can be both positive and negative and can vary in intensity as well as spatial and temporal extent. Cumulative impacts may interact such that they trigger or are associated with other impacts. They may aggregate linearly, exponentially or reach 'tipping points' after which major changes in environmental, social and economic systems may follow. (p.10)

In the case of coal, the heightened prominence of climate change, a cumulative impact writ large, adds a further layer of complexity. (p.1)

The EIS does not adequately consider the cumulative impacts of the Project, together with other projects proposed in the region, including, but not limited to, impacts on groundwater, climate change, the Great Barrier Reef, or threatened species such as the Painted Snipe.

¹ Franks, DM, Brereton, D, Moran, CJ, Sarker, T and T, Cohen. 2010. ***Cumulative Impacts: a good practice guide for the Australian coal mining industry***. Centre for Social Responsibility in Mining & Centre for Water in the Minerals Industry, Sustainable Minerals Institute, The University of Queensland.

Some of the many specific examples of failure in the CIA work are provided below. The CIA does not consider impacts of climate change on, e.g., water, air quality, ecological resilience, does not consider indirect impacts, and does not consider synergistic impacts.

Furthermore, Groundwater assessment relies on the groundwater analysis done for the Carmichael mine; to the extent that that has been shown to be incorrect, the CIA done for the China Stone project will also be incorrect.

And the scope of the CIA is limited in terms of relevant projects, as is admitted in the EIS:

'The scope of the CS EIS is limited to the mine site activities and does not include off-lease infrastructure [port capacity, rail connection to port, mine site access road connection and raw water supply] that will be required for the project.' (EIS Sec 4)

2. Groundwater

The groundwater modelling and assessment of impacts in the EIS does not allow for proper consideration of impacts of the Project on groundwater, and related surface water features and biota.

Examples include, but are not limited to, the following:

- There are a number of concerns with the numerical modelling on which the groundwater assessment is based, such as:
 - the calibration and sensitivity analysis undertaken;
 - the parameters applied in the model;
 - low recharge rates; and
 - an inaccurate conceptual model;
- The EIS recognises that subsidence from the longwall mining will cause "connective cracking" the Clematis Sandstone, an aquifer of the Great Artesian Basin (GAB), leading to permanent 'take' of groundwater from the GAB, yet the impacts on the GAB are dismissed as "inconsequential" or "negligible";
- There is no reliable or reasonable basis for the assertion that the Project will have "no impacts on the [Doongmabulla] springs".

3. Biodiversity

The EIS does not include an adequate assessment of the impact on threatened species and, where those assessments are conducted, demonstrates an unacceptable adverse impact on those species.

For example:

- The EIS identifies the site as providing habitat for the threatened Black-throated Finch and Squatter Pigeon but does not undertake sufficient targeted survey effort to accurately determine the abundance of these species, and therefore the extent of any likely impacts;
- The limited survey periods have been insufficient to identify the full range of terrestrial and aquatic species that may be impacted by the Project;
- The EIS does not include the Biodiversity Offset Strategy which makes it impossible to consider the adequacy of likely offset locations, appropriateness of any management actions or sufficiency of any monitoring.

4. Climate change

The EIS does not include an adequate assessment of the climate change impacts of the Project

For example, the EIS does not assess the emissions from the transport and burning of the coal produced by the Project. The 38 million tonnes per annum (mtpa) of product coal will produce approximately 90 mtpa in CO_{2-e} once burnt which will cumulatively total about 4.5 billion tonnes CO_{2-e} over the 50 year mine life.

These emissions are equivalent to about 18 million cars annually and, over the life of the mine, would consume approximately 0.7% of the remaining carbon budget for the world to likely stay below 2°C warming.

The Queensland Government has said "Climate change threatens to undermine Queensland and Australia's food security. Production from primary industries is projected to decline by 2030 over much of eastern Australia due to increased drought, reduced water resources and higher temperatures".

The Climate Commission also predicts reduced water availability and increased frequency of droughts, affecting agricultural production as a result of climate change.

Climate change is also a threatening process in many species recovery plans, such as for the Painted Snipe, but the EIS fails to consider the Project's contribution to that threatening process for those species.

5. Great Barrier Reef

The EIS does not adequately consider the impacts of the Project on the Great Barrier Reef either from port development and shipping, or from contributions to climate change.

The World Heritage Committee recently stated that "climate change, poor water quality and impacts from coastal development are major threats to the [Reef's] health," and indicated concerns about new port development and capital dredging for the expansion of existing port facilities.

The Project presents a significant risk to the values of the Great Barrier Reef and these impacts need to be fully quantified and considered.

6. Economics

The deficiencies of the economic assessment include, but are not limited to, the following:

- An assumed value of coal at over \$93 per tonne well above the Federal Treasury's long term forecast of \$80 per tonne.
- No attempt to value environmental or social costs, such as greenhouse gas emissions, in a manner that can be compared with economic benefits.
- No attempt to assess the viability of the project to ensure economic utilisation of the coal resource and avoidance of a stranded asset.

7. Social impacts

The EIS does not adequately consider the social impact from the proposed project.

For example:

- The EIS fails to comply with the terms of reference requirement to consider labour supply issues and strategies for international labour markets.
- The Social Impact Assessment (**SIA**) fails to consider impacts beyond the mine site including the effect of mine closure on local communities;

- The SIA does not sufficiently engage with indigenous cultural values due to the small number of landholders consulted regarding cultural values of the area;
- The SIA assumes the construction of the Carmichael project and therefore does not adequately consider the impacts of the Project in isolation.
- The SIA acknowledges the FIFO employment model but does not provide recommendations to manage the problems that will create.

8. Public interest

The consideration of public interest requires the weighing of pros and cons for the Project.

NQCC contends that the extent of the demonstrated and potential impacts outweighs the potential benefits of the project and warrant refusal in this instance.



Wendy Tubman
Coordinator