

Submission on supplementary information to the environmental impact statement—China First Project

Submissions close at **5pm on Monday 6 May 2013**

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Section of report	Describe the issue	Suggested solution
SEIS	This 4,182 page document repeats and confirms serious deficiencies previously pointed out in the EIS. A few of the multitude of these are addressed below.	Reject the project.
1.4 Project Changes Since EIS Lodgement V1 Part A, p. 16	The SEIS assumes that “utilising an initial temporary supply of raw water from a borefield in the vicinity of the mine” is a viable option.”	Proponent must accept that extracting water from a Great Artesian Basin (GAB) borefield is not a viable alternative. A finite resource such as the GAB, with its associated fragile ecosystem needs to be treated with respect. The proposed temporary extraction and use of the GAB by Waratah has failed to achieve an adequate management

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		<p>plan of this natural resource that would enable Waratah to achieve its goal¹.</p> <p>According to the Department of Sustainability, Environment, Water, Population and Communities²: “It was recognised by the early 1900s that control over GAB groundwater was inadequate and there was a reduction in water pressure and volume due to the increasing number of free-flowing bores drilled”.</p> <p>Uncontrolled flow from bores and open earth bore drains in the Great Artesian Basin threatens the health of important groundwater, dependant ecosystems and the continued access to artesian water by pastoralists. In addition, it has become difficult for new water users in or near the Great Artesian Basin to obtain access to groundwater resources. The waste of water is causing environmental damage through:</p> <ul style="list-style-type: none"> • reduced pressure in some naturally occurring artesian mound springs, with probable extinction of aquatic invertebrate species³ • encouragement of the spread of pest plants and animals • land and water salinisation <p>The Federal Government is currently funding the Great Artesian Basin Sustainability Initiative (GABSI) to assist in improving pressure in the Basin⁴. The Management Plan was launched in 2000. It would not make any sense to grant the coal miners permission to access the GAB water reserves until their studies have been completed in 2015⁵. Careful and sustainable management of this valuable resource is vital for future generations and should not be used for the benefit of mining companies</p>

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		until a water source is established for proposed mines. This leaves the question: Where will Waratah get the water necessary to mine the coal?
SEIS V 1 part C p.198	The SEIS assumes that the proposed pipeline from the Burdekin River as a permanent water source to the mines is a viable option.	In order for this to be even a viable option, the proponent must first conduct a cumulative analysis of groundwater recovery that takes account of other mines proposed nearby and also, factor in the strong possibility of having to deal with droughts.
SEIS V 1 part C p.199	The proponent claims: “The proposed offsets will provide the same values as those currently contained within the Bimblebox Nature Refuge and will be located as close as possible to the BNR, within the Desert Uplands Bioregion”.	Proponent must accept the fact that it is not possible for the same values contained within BNR to be replicated in the offset seeing as much labour-intensive work and financial investment have been required to ensure that the property’s conservation values are both maintained and enhanced, e.g. feral weed and animal control. Over 96% of BNR comprises remnant woodland that has never been cleared. Offset areas of ecological equivalence are not present. The destruction of Bimblebox Nature Refuge cannot be ‘offset’.
V2 App 35 Biodiversity Offset Proposal, p 3111	Information omitted from the SEIS includes: <ul style="list-style-type: none"> • lot on plan numbers and addresses of offset options • property descriptions such as location adjacent to protected areas and names of watercourses • property specific mining reports and threatened species records reports • maps of offset properties. 	By omitting this information, the proponent violates one of the recommended international criteria for offsets, in that they be open and transparent. ⁶ The proponent must understand that it is not possible to determine the quality of the biodiversity of an offset property without knowing which property it is and where it is located. In the case of Property #1 being offered as the offset to Bimblebox Nature Refuge, how can the owners comment on it based on the vague written promise from Waratah Coal? Would any business person in their right mind settle for such an agreement? If WC is confident that

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		Bimblebox can be offset and that Property#1 is a fair trade, why not divulge the name and location?
Biodiversity offset Binder 2D P3103-3210	The proponent has ignored the recommended criteria for establishing offsets.	Proponent needs to meet the recommended criteria for establishing offsets. Where there is conflict e.g. mining versus the loss of significant biodiversity values, which Bimblebox Nature has, the environmental values should be the priority. ⁷
Biodiversity offset Binder 2D P3103-3210	The proponent has ignored recommended criteria for establishing offsets.	Proponent needs to meet the recommended criteria for establishing offsets which state that offsets must be located close to the area to be offset. None of the offset hub locations are close to Bimblebox Nature Refuge where all the vegetation would be removed (~8,000ha for an underground and a surface mine).
Biodiversity offset Binder 2D P3103-3210	The proponent has not clearly demonstrated a net gain for biodiversity as is required.	Proponent refers to 'no net loss' but fails to clearly demonstrate a net gain to biodiversity. The international criteria advises not offsetting areas with critical habitat, as is the case with Bimblebox Nature Refuge. ⁸
Biodiversity offset Binder 2D P3103-3210	The proponent goes against recommendations put forth by the State and Federal governments regarding preservation of Nature Refuges in order to avoid the loss of biodiversity.	In the Queensland Government document on the Desert Uplands ⁹ it states that three of the key management issues of this bioregion are inappropriate clearing, understorey species change (weeds) and loss of biodiversity. This government document would seem to overwhelmingly support the preservation of Bimblebox as a Nature Refuge as there is no inappropriate clearing, there is controlled management of weeds and there is maintenance of biodiversity. With less than 2.3% of the Desert Uplands bioregion held in conservation reserves,

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		the destruction of BNR would significantly reduce this percentage and result in a subsequent loss of even more biodiversity in this unique region
1.4 Project Changes Since EIS Vol1 Part A, p. 18	The proponent has neglected to address numerous issues connected to their proposal to build a new railway line.	The proponent's proposal for a rail line from the Galilee Basin to Abbot Point port should be denied. They have neglected to demonstrate its cost effectiveness. The approved GVK- Hancock rail and port project with Aurizon is to be one of the most expensive infrastructure projects for Queensland, and will be one of the most short-lived.
1.4 Project Changes Since EIS Vol1 Part A, p. 18	The proponent has neglected to address numerous issues connected to their proposal to build a new railway line.	The proponent's proposal has higher transport costs than its competitors as stated as one of four key issues requiring resolution (p 21). The extraction of 1.4 billion tonnes of raw coal from China First over the proposed 30 year life of the mine will not happen as the global community will enforce a reduction in greenhouse gas emissions from coal well before 30 years. The high cost of the rail infrastructure and the cost to affected landholders far outweigh the very short-term benefits of this railway line.
SEIS Appendix 42 – Updated Cumulative Impact Assessment Section 3.7 Greenhouse Gas Emissions	The SEIS does not begin to satisfactorily address the climate change issues that will result from carrying out this project.	The proponent has neglected to include the figures regarding the emissions generated by this project. Eminent Australian climate scientist Professor David Karoly ¹⁰ has warned that our coal exports are by far Australia's greatest contribution to climate change at about 140% of domestic emissions in 2011-201. If the world is to meet existing internationally agreed targets to limit global warming to 2 degrees, Queensland cannot mine coal from the Galilee Basin for a 30-year duration with the capacity for further expansion. This will not happen therefore these reserves must remain

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		underground.
1.4 Project Changes since EIS Vol1 Part A, p. 21 09/12	The limit of the assessment for this project is now defined as the boundary of the APSDA	<p>Proponent has no secure port access at Abbot Point, so the mine and rail project should not be considered until there is a definite plan for export of coal from China First. Due to concerns by UNESCO of the impacts of port expansion on the Great Barrier Reef the State Government has imposed limitations on the expansion of the Abbot Point port.</p> <p>Proponent states in the SEIS that of the four key issues that require resolution the number three is congestion at existing ports (p 21), but it also comments that it will utilise facilities within the Port of Abbot Point. There is only one terminal currently present and its capacity is fully committed for the next ten years. GVK-Hancock has approvals from the State and Federal governments to build another terminal for its own use. Currently no other proponents have approvals. To prepare a proposal and proceed with the approval process and then construct a terminal takes longer than four years. 2017 is the proposed time for export of the coal from Waratah First. The issues of congestion at Abbot Point port and the limitations on its expansion warrant refusal of the project until Waratah can secure a terminal within their proposed time frame.</p>

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SEIS Chapter 14 - Economy	The SEIS demonstrates a severe lack of cost benefit analysis.	The proponent must conduct a cost benefit analysis as part of the Terms of Reference for this project along with the SEIS Revised Economic Modelling results. 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. 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.

Signature: (A submission by more than one person must be signed by each submitter.)