

## Submission on the additional information to the environmental impact statement (EIS)—Carmichael Coal Mine and Rail Project

Submissions close at **5pm on Friday 20 December 2013**

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Section of additional information to EIS	Describe the issue	Suggested solution
SEIS	It is unrealistic to think that the average Australian, many of whom will be impacted by this railway project, will be able to understand let alone read the document in its entirety let alone respond to its contents in the period of time allotted.	Extend the period of time to a more realistic period.

Complete, print and sign this form and send it to one of the following:

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**Post** The Coordinator-General  
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**Privacy:** The Coordinator-General is authorised to collect personal information under sections 24 and 29 of the *State Development and Public Works Organisation Act 1971* (SDPWO Act). Your personal information will be used for the purpose of considering your submission, assessing the additional information to the EIS, completing the EIS process and the performance of functions under the SDPWO Act and other legislation relevant to the proposed project. Your personal information will be disclosed to the project proponent and other government agencies that are involved in the proposed project, and is also subject to disclosure under the *Right to Information Act 2009*. Your personal information will not otherwise be disclosed, unless disclosure is authorised or required by law, or is permitted under the *Information Privacy Act 2009*.

**Note:** Under section 1570 of the SDPWO Act, it is an offence to give the Coordinator-General a document that contains information known to be false or misleading.

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8.6 Summary	'Implementation of the proposed Project offsets (as described in Volume 1 Section 9) it is considered that the overall impact of the Project can be managed.'	There are too few examples – one maybe two – of successful offsets In the history of Queensland for this statement to be even remotely assuring. The word 'considered' is fraught with uncertainty. And the use of 'can' as opposed to 'will' is disconcerting because it expresses no certainty that the impacts WILL be managed. To date, Queensland has a VERY poor history when it comes to coal mining companies managing impacts. (See <i>Mining: The Queensland Way</i> , by Drew Hutton available at <a href="http://www.lockthegate.org.au/shop">www.lockthegate.org.au/shop</a> )
Cumulative impacts of high risk	High impacts on the terrestrial ecology.	This project will be extremely detrimental to the terrestrial ecology from the Galilee Basin to the coast. Many habitats will be affected as will the fauna inhabiting them. The cumulative impacts need to be studied more closely and in conjunction with those of the other proposed mines in the area.
Listed Threatened Species and Communities	The Brigalow TEC to be cleared comprised a total area of 37.4 ha.	The draft Recovery Plan for Brigalow Endangered Ecological Community cites coal mining as a key threat and therefore it should not be subjected to it.

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<b>Listed Threatened Species and Communities</b>	Impacts to Brigalow threatened ecological community (TEC) will result from unavoidable vegetation clearing, however, large areas of these TEC are protected in the surrounding landscape and losses equate to less than 1 per cent of the subregional extent of each TEC. Losses are not expected to affect the ongoing prevalence or genetic diversity of these TEC within the subregion.	The word ‘expected’ is not reassuring. There is no guarantee and the science certainly isn’t there to prove one way or the other. The certainty remains that there WILL be impacts and that these WILL be detrimental to the threatened species in the affected areas. The solution is NOT to clear any of these regions, especially the unacceptable clearing of Brigalow Endangered Ecological Community.
<b>Listed Threatened Species and Communities</b>	Whilst all reasonable efforts will be made to minimise impacts to flora and fauna values within the operation phase footprint, vegetation loss, fauna habitat loss and fauna mortality will occur.	The wording and tone of the SEIS suggest that the loss of threatened species and communities is but a mere consequence of mining. This is unacceptable and a reassessment of the impacts should be made as stated by the terms of reference.
<b>Listed Threatened Species and Communities</b>	The overarching objective of managing impacts during the operation phase will be to maintain and where at all possible enhance the ecological values that characterise the Project Area and the surrounding landscape, with a view to achieving no-net-loss of regional biodiversity values.	This would be a first in the history of mining in Queensland! And it would be nice to know exactly how this will be accomplished. The Proponents need to provide a detailed explanation of how this will be accomplished.
<b>Clearing of Black-throated Finch habitat</b>	Over 9000 ha of the threatened Black-throated Finch’s habitat is slotted for clearing for this project.	This is a threatened species and its habitat should not be cleared. There is absolutely no guarantee (or scientific evidence) that the declared offsets will be a suitable replacement for their existing habitat.

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<b>Squatter Pigeon survey</b>	Squatter pigeon (southern) was the only threatened bird listed under the EPBC Act recorded. The squatter pigeon (southern) is likely to be locally common within the Study Area, and the broader region, where suitable habitat is present. A further three EPBC Act listed threatened fauna are likely to occur at the Study Area, potential habitat for these species within the Study Area was identified and mapped.	But no mapping or range estimates have been done for this species and grossly insufficient surveys have been conducted. At the very least seasonal targeted surveys need to be conducted and its ranges mapped. Because it is an EPBC listed threatened species, proceeding with this project prior to completing satisfactory surveys is not acceptable.
<b>Total area Squatter Pigeon habitat to be cleared is 11,034</b>	Squatter pigeon (southern) was the only threatened bird listed under the EPBC Act recorded. The squatter pigeon (southern) is likely to be locally common within the Study Area, and the broader region, where suitable habitat is present.	Although the Squatter Pigeon numbers are fairly healthy in Central Queensland, this is the only place in Queensland where this is the case. Clearing will cause its numbers to decrease, which will make it all the more threatened. Clearing Squatter Pigeon habitat is therefore not an option.
Threatened ecosystem surveys	Adani's estimates of the amount of Brigalow at 75 million hectares.	This correct number is actually 7.3 million. Core areas with remnants are located in the Northern Bowen Basin, Belyando Downs, Isaac-Comet Downs and Claude River Downs subregions of the Brigalow Belt North bioregion and in the Southern Downs and Moonie River-Commoron Creek Floodout subregions of the Brigalow Belt South Bioregion (Butler 2007). With less than 8% of this vital ecosystem remaining today we can hardly afford to lose any more. Clearing of any remaining threatened Brigalow should not be allowed. This ecosystem has already suffered over 90% decimation at the hands of Europeans.

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Threatened species surveys	The threatened species surveys carried out by Adani are deficient and riddled with inconsistencies.	In order to convey an accurate picture of which species inhabit or depend on a given area, the surveys need to be carried out during each season over a matter of years. If there is a long term drought, it is necessary to wait for a wet season and to carry out another survey. One or two surveys do not give an accurate account of the situation. They must also be carried out using the same methods.
Threatened plant surveys	Omission of threatened plants the Blue devil <i>Eryngium fontanum</i> , the Salt pipewort <i>Eriocaulon carsonii</i> and the Waxy cabbage palm <i>Livistona lanuginose</i> .	While the EIS acknowledges that the Doongmabulla Springs area hosts threatened flora species, there is no assessment of the impact of the drawdown and the implications of altering the hydrology to the area where these species occur. The proponent's intention to carry out an ecological survey on the springs prior to any dewatering is unacceptable. This should have been carried out prior to requesting public comment.
Groundwater	Operational works may realise groundwater draw down impacts to the Doongmabulla Springs, a regionally important Great Artesian Basin discharge spring ecosystem listed as a TEC under the EPBC Act.	This precious system is home to many endemic and threatened species. Although Adani claims there will not be enough drawdown to affect the springs, there is no proof of this, it is purely conjecture.
Railways	The railways will transect many wildlife habitats which will create fragmented habitats.	Fragmented habitats are detrimental to the survival of species as they cause a reduction of healthy genetic diversity for numerous species.

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Matters of National Environmental significance	Persistent organic chemicals, heavy metals, or other potentially harmful chemicals accumulating in the marine environment.	There is no mention of this in the section on Matters of National Environmental Significance. We cannot keep dumping these non-biodegradable, toxic, harmful chemicals into our oceans. They will never disappear. They will only accumulate to the point where everything they come into contact with will die. The claims elsewhere in document (MNES 2-4) by the proponent that mine water will 'be subject to significant scrubbing prior to reaching the coast' is ambiguous at best and begs the question 'Where WILL the chemicals be deposited?' This needs to be clearly stated in the SEIS.
Offsets	Offsets locations have been deleted in the name of confidentiality.	This is absurd. How can we possibly gauge their value if we have no idea where they are or what they contain? And how can we assess whether or not they will prevent the cumulative impacts on biodiversity at the local and bioregional levels? The location of the offsets must be revealed prior to our being able to make an accurate assessment of their value.
CONCLUSION		The SEIS does not fulfil the requirements set forward by the terms of reference and therefore the project should be put on hold until all the questions are answered and the transparency of the process has been ensured.

Signature: 

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