



3 November, 2009

Referral Business Entry Point, EIA Policy Section (EPBC Act)

Approvals and Wildlife Division

Department of the Environment, Water, Heritage and the Arts

GPO Box 787

Canberra ACT 2601

Dear Sir/Madam,

Re: Reference No. 2009/5158 Balaclava Island Coal Export Terminal Project

Capricorn Conservation Council (CCC) wishes to submit comments related to the referral of the above project under the *Environmental Protection Biodiversity Conservation Act, (EPBC) 1999*.

It is the opinion of CCC that the proposed placement of this coal terminal and its site investigation area is extremely ill-founded. Balaclava Island is not only located in a World Heritage Area, but is listed on the Queensland Heritage Register and the Register of National Estate. It is located adjacent to the Great Barrier Reef Marine Park (Qld) and The Narrows, an Important Wetland (Directory of Important Wetlands).

Location and site investigation area

Balaclava Island is grossly unsuitable for a coal terminal due to its geomorphology as predominantly low-lying tidal mud flats which receive inundation twice a day to a depth of up to five metres. The island is situated at the mouth of the Fitzroy River and is in close proximity to The Fitzroy River Fish Habitat Area – an area protected from coastal development. The island is also a ‘Greenfield’ area under Department Infrastructure and Planning state laws and should not be considered suitable for any type of industrial development.

Water requirements for the facility appear doubtful through the Gladstone Area Water Board, in which case groundwater resources would be used, necessitating a substantial water treatment facility. The proponent proposes several options for the remaining brine solution, none of which seem particularly suitable. CCC suggests more consideration should go into this critical area of management.

Environmental impacts

The high environmental values of Balaclava Island and surrounding islands will not support train unloading facilities, coal stockpile, overland conveyor, ship-loading and berthing facilities, access roads and other infrastructure. Furthermore, it is difficult to envisage how fringing mangroves, saltmarshes, marine swamps, and estuaries, which support a vibrant fish nursery and habitats, will escape serious degradation from dredging and the dumping of spoil.

As a result of dredging, changes to the area's hydrology will have the potential to impact breeding, nesting and feeding sites of marine species (e.g. endangered turtle species) and terrestrial fauna including wetland and migratory birds. Marine plant species will also be impacted. Sedimentation from dredging will potentially reduce water quality in this sensitive area.

The area is likely to support the critically-endangered Yellow Chat, and whether any are 'located' at the time environmental studies are undertaken, is irrelevant. The clearing of 240 ha will disturb and/or remove their habitat or their potential to find habitat in the area. The same may be said for many species; offsetting measures cannot recover such localised loss.

CCC is concerned about the three Threatened Ecological Communities nominated by the proponent and the potential that this project has to impact them. (It is noted that ecological community, 'Littoral Rainforest and Coastal Vine Thickets of Eastern Australia' is critically endangered.) Every attempt should be made by the proponent to change or re-route site infrastructure so that these communities are preserved and fragmentation is minimised. Once again, offsetting measures, while of paramount importance, do not account for localised loss to species and connecting ecosystems.

Conclusion

CCC has grave concerns for the sensitive environment of Balaclava Island, its surrounding islands, marine ecosystems, and its world and national heritage values if such a project should get approval. Furthermore, Australia's reliance on coal and the export of this resource is not assisting the planet to lower greenhouse gas emissions; in fact while this addiction to coal continues, the window of opportunity is quickly closing.

We thank you for this opportunity to submit to the EPBC Act referral process and have our concerns heard.

Yours sincerely,

Janet Barrett
Coordinator