



National Parks Association of Queensland Inc. Submission on Waratah Coal Galilee Coal Project Environmental Impact Statement

19th November 2011

The **National Parks Association of Queensland** (NPAQ) is an environmental non-government organisation established in 1930 to promote the preservation, expansion and wise management of National Parks and protected areas in Queensland. Many of the major National Parks in Queensland were declared following field-based surveys, biodiversity assessments and representation by NPAQ to the State government.

NPAQ advocates for strategic additions to the protected area estate, especially the acquisition of those areas that will enable Australian vegetation communities, plants and animals to adapt to the impact of climate change. In addition, NPAQ members make significant contributions to protected area management, through projects such as Friends of Park, and continue to provide input into the WildNet database, which underpins management decisions made about species conservation.

NPAQ has a strong interest in Nature Refuges as a valuable conservation tool to promote biodiversity protection in Queensland. NPAQ also supports the Government's Q2 protected area targets which, if achieved, will see the Nature Refuge estate grow to seven million hectares by 2020¹.

NPAQ's comments on Waratah Coal's Chine First Environmental Impact Statement (EIS) focus on the impact this proposed mine would have on Bimblebox Nature Refuge (BNR). Consistent with this stance, NPAQ believes that this incredibly biodiverse property - providing 8,000 hectares of intact remnant bushland in a region dominated by land cleared for grazing - should be protected forever.

NPAQ's submission highlights four major areas around which the Association strongly objects to the current mining proposal:

1. Direct impact of mining on Bimblebox Nature Refuge
2. Loss of significant conservation and refuge values of the Nature Refuge
3. The inadequacy of proposed offsets
4. Dangerous precedent for the destruction of protected areas

¹ At the time of writing, 398 Nature Refuges covering 2.8 million hectares can be found in Queensland.

1. Direct impact of mining on Bimblebox Nature Refuge

The comprehensive and direct impact of mining on Bimblebox is undeniable.

The EIS states that *although the above ground works are expected to clear slightly greater than 50% of the reserve, this may lead to public and environmental perception that there is a substantial visual impact even though the site is only partially affected* (Vol 2, Ch 5, pg 163). The following list of potential impacts (Vol 2, Ch 6, pg 187) to Bimblebox created by the proposed clearing illustrate that these perceptions are well founded, especially given that sub-surface mining and associated infrastructure activity will essentially destroy the ecology of the remaining half of Bimblebox:

- Direct reduction in remnant vegetation due to clearing
- Increased edge effects within Bimblebox Nature Refuge, including the potential to increase the abundance of buffel grass and other weeds
- Potential for increased fire intensity associated with likely buffel grass infestations
- Potential changes to vegetation above underground mining areas
- Potential for dust to reduce the health of retained vegetation in the vicinity of the clearance footprint
- Potential for temporary facilities, materials and equipment to damage areas outside the construction footprint
- Potential to alter the hydrological characteristics for areas above the underground mining area and areas adjoining downstream of the mine
- Potential for accidental and inappropriate release of pollutants

NPAQ believes that these potential impacts **will be fully realised** if the China First project proceeds, relegating Bimblebox to a highly altered and fragmented relict of its former conservation value. Mining will irrevocably change the nature of this Nature Refuge, creating a dangerous and unacceptable precedent for the clearing of similar properties.

The destruction of Bimblebox will also affect landholder commitment to conservation in Central Queensland. Equally important to the demonstrably conservation value of these Refuges is the ongoing commitment by the Bimblebox landowners and others to manage their land sustainably by giving priority to biodiversity. On BNR, this is manifest in their strategic use of grazing to protect flora and fauna, their hosting of research projects designed to improve land management in the Desert Uplands, and their approach to managing fire and eradicating invasive species. These efforts are not mentioned or captured anywhere within the EIS.

Mining Bimblebox sends a clear message to other conservation minded graziers that their efforts are not valued or held in high regard.²

² Note that 40 Agforce members have Nature Refuges on their properties, covering over one million hectares in Queensland.

2. Loss of significant conservation and refuge values of Bimblebox Nature Refuge

The Bimblebox property was bought specifically with the aim of protecting the land from clearing. It is managed for its rich biodiversity values and as a working example of integrated production and conservation. The Federal National Reserve System program contributed almost \$300,000 for its purchase, and it is covered by a perpetual conservation agreement with the State Government.

In summary, significant features of the Bimblebox Nature Refuge include:

- Essential habitat for the endangered Black-throated Finch (BTF)
- Habitat for the vulnerable Squatter Pigeon
- Relative abundance of the near threatened Black-chinned Honeyeater
- Relative abundance of the near threatened Large Podded Tick-trefoil
- 15 EPBC-listed marine or migratory bird species
- One migratory butterfly species, and 14 bird, mammal and reptile species of conservation significance for the Desert Uplands, including koalas
- Current bird species count of 143 species
- Crucial habitat in a landscape otherwise dominated by cleared grazing land

NPAQ notes that Birds Australia has verified the sighting of endangered Black-throated Finches by one of its members on BNR in May 2011. This important discovery confirms the need for systematic and regular surveys of this species on the Refuge to ascertain full population numbers and areas of critical habitat.

In addition, the Desert Uplands IBRA Report for bird biodiversity states that:

*Although the avifauna of Desert Uplands is typical of tropical woodlands across northern Australia, **it appears to contain the last substantial population of the southern sub-species of the black-throated finch**, a taxon that has disappeared from most of its range in southern Queensland and northern New South Wales since the last (Birds Australia) Atlas survey period. There are a few introduced species in the bioregion, but there have been significant declines in the reporting rate of many woodland taxa and ground-feeding insectivores. This may be related to the **extensive land clearance that has occurred in recent decades**.*

The Desert Uplands Report goes on to suggest that an important action is to:

*Secure a functional landscape against clearance and overgrazing, **including adequate representative areas of each community**.*

As noted above, other significant bird species that have been sighted include the vulnerable Squatter Pigeon and the Black-chinned Honeyeater (listed as near threatened).

NPAQ is also concerned about the loss of several vegetation communities on Bimblebox, particularly:

RE 10.3.4 (least concern/of concern)

Low open-woodland to woodland of *Acacia cambagei* with very open tussock grassland, which is recorded as providing habitat for the endangered species *Nesaea robertsii*. While this species is not mentioned within the EIS and not recorded during associated field surveys, this does not rule out the possibility that populations of this species are yet to be found on BNR.

RE 10.3.12 (least concern/no concern)

Fringing and frontage *Corymbia plena* and *C. dallachiana* open-woodland, usually with *Aristida* spp. dominant in the ground layer. The REDD database notes that *this ecosystem has important values for stabilising stream banks and top soils, providing corridors for wildlife, and for trapping soil and maintaining water quality.*

RE 10.3.27 (least concern/of concern)

Open-woodland to woodland of *Eucalyptus populnea* occasionally with understorey of *Archidendropsis basaltica*. The only protected areas that provide formal protection for this regional ecosystem is Cudmore National Park and Cudmore Resources Reserve.

Bimblebox is truly a nature refuge, actively preventing the elevation of a range of species and vegetation communities into threatened or endangered categories. Given the number and extent of major coal projects proposed for the vicinity, it is likely that Bimblebox will become an even more important refuge habitat in the future. The prospect of large neighbouring coal mines, particularly the Hancock Alpha coal project, makes retention and protection of the Bimblebox Nature Refuge even more essential.

3. Inadequacy of Proposed Offsets

Under the Queensland Department of Environment and Resource Management Biodiversity Offsets policy, mining companies must meet at least one of three offset options when clearing vegetation of significant environmental values for mining. NPAQ understands that options two and three are not available if an endangered species is present in the mining site. As stated earlier, there is direct evidence that the endangered black-throated finch nests within Bimblebox Nature Refuge. It may also nest in suitable areas within its range along the coal rail corridors proposed by Palmer/Hancock from the Galilee Basin to the port of Abbot Point north of Bowen. To date, ecological surveys have not extensively covered these 495km routes.

Offsets option one is only possible where an ecologically equivalent area is available in the bioregion to offset the loss. There is no other area within the bioregion, of comparable size or larger, that contains the same mix of ecosystems and has an understorey that is in equivalent condition to Bimblebox Nature Refuge. Indeed, the commonwealth Nature Refuge Agreement with the Bimblebox Nature refuge owners states that *sites within the property contain the greatest understorey floristic biodiversity for these vegetation types within the region.*

Furthermore, Waratah Coal has not demonstrated in the EIS that appropriate offset areas exist in the vicinity of Bimblebox Nature Refuge. Appendix 27 describes a desktop study undertaken to locate areas of *remnant vegetation of the dominant [Regional Ecosystems] found within the [Bimblebox Nature Refuge]* (Appendix 27, p.31). NPAQ believes that the biodiversity values of an offset should be fully demonstrated, ground-truthed and documented within the EIS before they can be used to offset biodiversity losses.

NPAQ is extremely concerned that offsets themselves are not permanently protected from clearing for other mining at a later date. This is a significant problem in mining basins such as the Bowen, Galilee and Surat Basins, which are almost completely covered with coal and petroleum (coal seam and shale gas) mining permits. One offset is offset by another and the process potentially continues across the Brigalow, Desert Uplands, Einsleigh Uplands and Mitchell Grass Downs Bioregions until potentially little remains but fragmented habitat, regrowth and revegetation areas, with a subsequent severe decline in biodiversity.

Offsetting remains a controversial and uncertain option for protected areas. As stated in the Waratah Coal EIS, *no specific offset policy is currently in place for protected areas* (Appendix 27, p.15). This reflects the fact that both the State and Federal governments are yet to determine how the destruction of protected areas could be appropriately compensated for, if at all. Since there has been no adequate or conclusive public discussion of this matter, NPAQ believes that it would be highly inappropriate to proceed with any action that may cause significant negative impact on a protected area such as a Nature Refuge.

In summary, offsetting Bimblebox will result in a net loss of biodiversity for the region and state. Indeed, it is questionable whether this Nature Refuge can actually have its biodiversity loss offset according to the Queensland Biodiversity Offsets Policy.

Offsetting would be an entirely inadequate approach to *compensation* for the loss of Bimblebox Nature Refuge. There should be no mining on Bimblebox Nature Refuge, and future legislative change should be made to ensure that Nature Refuges with significant environmental values can be sterilised from mining in the same way that National Parks are.

4. An Unacceptable Precedent

Bimblebox Nature Refuge occupies Glenn Innes station just north of the Central Queensland township of Alpha. Ninety-five per cent has never been cleared of its original ecosystems and provides excellent habitat for many of the species in the Desert Uplands, an area now covered by coal mining and coal seam gas exploration permits. Only 3.1% of this bioregion is recorded as protected in the National Reserve System, far less than the internationally recommended 17%. The Commonwealth rated the property as IUCN Category IV, further evidence that Bimblebox should never be mined, or be subject to any actions that will adversely affect its environmental values.

If Bimblebox is mined, it sets an unacceptable precedent for mining other Nature Refuges, areas that the Queensland government promised would be protected for perpetuity. Nature Refuge declarations are not made lightly, only cover lands with significant conservation values, and provide an incredibly valuable public good for the benefit of future generations.

It is simply inexcusable that any Nature Refuge should ever be mined.

When the Queensland government signed the UN Convention on Biological Diversity, they agreed to report on lands set aside for biodiversity protection under the National Reserve System. Nature Refuges are a part of this system. If the China First mine is allowed to proceed, it will be the first time that a Queensland property covered by a Nature Refuge Agreement was destroyed for mineral extraction. This sets an unacceptable precedent for the Queensland protected area estate and directly undermines the State Government's Q2 protected area target of achieving 20 million hectares of protected land by 2020, of which seven million hectares will be delivered by Nature Refuges. Approval for the mine's development also contravenes the State Government's perpetual Nature Refuge conservation agreement, and National and International IUCN protected area standards.

There should be no mining on Bimblebox Nature Refuge, and future legislative change should be made to ensure that Nature Refuges with significant environmental values are sterilised from mining, and given the same level of protection as a National Park.



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