



**CONSERVATION
COUNCIL** ACT REGION

Submission to the Australian Government
Department of Climate Change, Energy, the
Environment and Water

EPBC Act reconsideration of Alpha North Coal Mine Project, Galilee Basin Qld (2018/8189)

November 2022

The Conservation Council ACT Region is the peak non-government environment organisation for the Canberra region. Since 1981, we have spoken up for a healthy environment and a sustainable future for our region. We harness the collective energy, expertise and experience of our more than 40 member groups to promote sound policy and action on the environment.

We campaign for a safe climate, to protect biodiversity in our urban and natural areas, to protect and enhance our waterways, reduce waste, and promote sustainable transport and planning for our city. Working in the ACT and region to influence governments and build widespread support within the community and business, we put forward evidence-based solutions and innovative ideas for how we can live sustainably.

At a time when we need to reimagine a better future, we understand that the changes we need will only happen with the collective support of our community.

For further information please contact:

Elle Lawless, Executive Director, director@conservationcouncil.org.au.

Introduction

The Conservation Council ACT Region welcomes the opportunity to provide comment on the Alpha North Coal Mine Project, Galilee Basin Qld (2018/8189). The Council acknowledges the preparatory work done by the Environment Council of Central Queensland and their Environmental Justice Australia legal team in gathering evidence and securing the agreement of the Environment Minister to reconsider a number of coal and gas projects.

The science of climate change is firmly established and its manifestations (fires, floods, droughts, storms, heat waves, coral bleaching, freak snowfall etc) are becoming more apparent and devastating in Australia and around the world. Yet Australia's key environmental legislation and project approval process, the *Environment Protection and Biodiversity Conservation Act 1999* (the EPBC Act) fails to take into account the contribution of projects to climate change.

Despite decades of evidence of the primary role of fossil fuels in atmospheric pollution and warming and its consequent effects on the natural world and human health and society, Australia has continued to extract and burn fossil fuels domestically and is still a leading exporter of coal, oil and gas. It is high time that Australia heed the calls from industry, regulators, experts, and all sectors of society to end the extraction and use of fossil fuels, and update legislation to enable the prohibition of new projects and the proactive phaseout of existing projects.

Substantial new information about the impacts the action has, will have or is likely to have on a matter protected under Part 3 of the EPBC Act

The Environment Council of Central Queensland (ECoCeQ) and their Environmental Justice Australia legal team have provided material that qualifies as 'substantial new information'.

The material submitted comprises [thousands of documents](#) detailing the impact of this proposal on nationally significant animals, plants, ecosystems and places which are "matters of national environmental significance" protected under the EPBC Act. Particularly, the 2021 and 2022 IPCC reports and the 2021 Australia: State of the Environment Report together make a compelling case that this proposal will cause harm.

Of key concern is that the climate impacts of the project were not considered in the first decision.

There is strong consensus from global organisations that we face an accelerating climate emergency. In 2021 the International Energy Agency [warned](#) that the world cannot afford new coal, oil and gas projects. As UN Secretary-General António Guterres [said in April](#) 2022, "investing in new fossil fuel infrastructure is moral and economic madness." The Director-General of the World Health Organization says the "modern addiction to fossil fuels is not just an act of environmental vandalism... it is [an act of self-sabotage](#)". Mark Brown, Prime

Minister of the Cook Islands, highlights Australia’s contribution to global emissions and the plight of millions of people affected by climate-driven ecological change: “it is up to the G20 countries responsible for 80% of global emissions that we are beholden to for our survival. Our survival is being held to ransom at the cost of profit and an unwillingness to act despite the ability to do so.”

When announcing the Threatened Species Action Plan in October 2022, Environment Minister Tanya Plibersek acknowledged that “our native wildlife continues to be threatened by climate change”.

Climate change has a multiplying effect on other pressures on the natural world, including exacerbating wildfires, enhanced La Nina rainfall flooding, bleaching events on the Great Barrier Reef, beetle infestations killing alpine forests due to changing microclimates, as documented by the 2016 and 2021 Australia: State of the Environment Reports. Living Wonders has collated detailed evidence of the [climate impacts of fossil fuel projects](#) on thousands of animals, plants, ecosystems and places, many of them already threatened or endangered.

The 2020 [Independent review of the EPBC Act](#) recommended that “National Environmental Standards ... should require development proposals to explicitly consider the likely effectiveness of avoidance or mitigation measures on nationally protected matters under specified climate change scenarios, and transparently disclose the full emissions of the development.” This has not yet been implemented. Even if/when this recommendation is implemented, it will not be possible to mitigate or offset the emissions to be produced by this project. Avoidance – by rejecting the project – is the only feasible pathway to limit the worst of global warming.

It is high time that the Australian Government revise the EPBC Act and reconsider – and reject – all current applications under the Act, including this project, to take heed of the international scientific consensus on the climate emergency. The Australian Government cannot continue to ignore the climate impacts of coal, oil and gas projects or shift the accounting of emissions to our export partners.

Recommendation

The Conservation Council ACT Region recommends that this project be reconsidered and rejected due to its contribution to global climate change, based on the evidence provided by Environment Council of Central Queensland (ECoCeQ) and their Environmental Justice Australia legal team.