

**Submission
to
Adani - Abbot Point Coal Terminal 0
Environmental Impact Statement**

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Submission from
Doctors for the Environment Australia Inc.
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Doctors for the Environment Australia (DEA) is an independent, self-funded, non-government organisation of medical doctors in all Australian States and Territories. Our members work across all specialties in community, hospital and private practices. We work to minimise public health impacts and address the diseases – local, national and global – caused by damage to our natural environment.

Recommendations

1. Because this Project is the facilitator of a huge development in fossil fuel exports, the EIS should be rejected until there is a cumulative impact study of all fossil fuel and port components of the fossil fuel industries in Eastern Queensland. The purpose will be to assess whether these projects are in the long-term national interest, environmentally, economically and in terms of human health and wellbeing.
2. In this cumulative study, Scope 3 emissions must be assessed for these are now accepted as a cause of environmental, economic and health impacts in Australia.
3. A cumulative study must include assessment potential runoff to coastal waters of toxic agents derived from both coal and unconventional gas development.

Introduction

The fundamental rationale of the EIS process is to assess the balance of positive and negative impacts upon which informed decisions can be made. The impacts may be environmental, health, social and economic.

Whilst Doctors for the Environment Australia addresses public health issues pertaining particularly to environmental causes of ill health, it is clear that good health exists within the wider context of sustainability and preservation of ecological support systems. On this basis we must make comment.

The EIS is flawed in that the Abbot Point and Dudgeon point developments are the key facilitators of coal export from vast new mines in Queensland. They must be considered in this context and indeed this has been tacitly recognised with the provision of a cumulative study. Potential impact on climate change and the Great Barrier Reef (GBR) must be considered along with the impact of all new mines in the expansion. Further, these impacts must be costed so a comprehensive economic statement is available. The community does not know whether

these developments cumulatively will have a positive or negative impact on Australia in the next decade or the next 50 years.

Australian governments can no longer ignore this wider issue, nor can they ignore the global impacts.

Climate change

Our view would be based on secure science. James Hansen well known NASA scientist respected for his work and integrity states

“Humanity is doubling down on its Faustian climate bargain by pumping up fossil fuel particulate and nitrogen pollution. The more the Faustian debt grows, the more unmanageable the eventual consequences will be. Yet there are plans to build more than 1000 coal-fired power plants and plans to develop some of the dirtiest oil sources on the planet. These plans should be vigorously resisted. We are already in a deep hole -- it is time to stop digging”.

http://www.columbia.edu/~jeh1/mailings/2013/20130329_FaustianBargain.pdf

This Abbot Port project facilitates this digging and burning, and Australia absolves itself with regulations which it believes favour its economic needs.

Under Commonwealth regulations, Scope 3 emissions are excluded from consideration. They become a problem for other nations: in 3.2.10 potential hazards from climate change on economical and environmental values are addressed “The probability of extreme weather events and sea level rises is expected to increase as a result of climate change and increases in such risks have the potential to affect the Project.”

This indicates that the proponent accepts that climate change (caused in part by the project) will impact the project. It is tacit acceptance that the Project must also impact Australia and this should be addressed in the EIS process in terms of human environmental and economic costs, bearing in mind that Australia’s contribution to international emissions will be increased from 2 to 4% by massive coal expansion.

We are aware that greenhouse gas emission impacts have been unsuccessfully tested in the Federal Court as relevant to the EPBC Act. The situation has changed because environmental values in Australia can now be shown to be damaged by exported emissions. Furthermore prudent governments will have to consider other impacts on health, infrastructure etc as evidence accrues of damage and costs.

Great Barrier Reef

DEA has the capacity to evaluate the many scientific assessments of the likely future of the GBR made by many other scientists in recent times.

There are a range of biological, chemical and physical factors that pose threats to the future health of the GBR;

- Overfishing
- Invasive species, particularly from increased ocean shipping traffic
- Pollution from agriculture, industrial activity, dredging and mining – producing a range of hydrocarbons, nitrogenous waste and heavy metals
- Sea level rise and warming as a result of climate change
- Increased run-off and silt due to increased storms and flooding
- Ocean acidification directly impairing reef calcification

Individually these constitute significant risks to the ecology of the Reef, but they act in concert and synergistically, magnifying and compounding the total and cumulative damage and so putting the very future of the Reef at stake.

This view has been unambiguously expressed by Australian and international scientists. In his recent lecture tour of Australia, renowned marine biologist Professor Callum Roberts estimated that the GBR may no longer be classifiable as a living reef within 20 years unless we reduce and reverse the pressures outlined above.

We are also aware of the concerns of the Federal Minister and the World Heritage Committee.

It is inconceivable to doctors, who apply a preventive principle to human harms whenever possible, that this huge mining export industry can be developed without an exhaustive cumulative impact study both on coastal waters (fishing) and Reef (the chances of its loss as a sustainable industry and consequential impact on employment and human wellbeing).

In particular in its submissions on Galilee Basin and major coal seam gas developments, DEA has expressed concern about potential runoff of toxic hydrocarbons into catchments which flow to coastal waters. Whilst these may be in very low concentration, it is their potential long-term

cumulative impact which must be regarded in a precautionary manner. This contamination from construction, mining, coal depots and mine emptying of water has not been assessed. Yet it should be categorised in the same way as agricultural chemicals.

Economic matters 3.20

Under the circumstances described above, the economic assessment is inadequate. The assessment with a risk-based framework approach fails to address a series of probabilities. When considered in conjunction with the Cumulative impacts in Section 4, it is clear that these inadequacies relate specifically to the need to:

- Assess all health, environmental and social costs in the context of the entire coal expansion for which it provides export facility.
- Provide full cost benefit analysis to assess the balance of positive and negative impacts upon which informed decisions can be made.

Although this and related projects detail expected economic gains for construction jobs, 'permanent' jobs, royalties and economic advantage, the negatives with which the project must be balanced are omitted. These are:

- Loss of or damage to agricultural and fresh water supplies.
- Damage to Australia from extreme weather events; such costs are beginning to emerge in many parts of Australia. This is imposing costs on health, infrastructure and agriculture.
http://dea.org.au/images/uploads/submissions/Extreme_Weather_Events_Submission_01-13.pdf
- Economic loss from (1) possible loss of World Heritage listing of the GBR if this and other projects are approved (2) loss of the GBR which on scientific grounds might be presently assessed at 50/50.

The assessment of this project must take into account one vital factor which remains undebated in Australia because a definitive study to debate has not been carried out;-

That the continued use of coal will contribute to the devastating effects of global climate change. It is plausible that international agreement and public opinion will not tolerate the decades of growth in coal production on which the financial expectations of this are based. Premature closures of mines would limit financial return that could not conceivably compensate for the long-term regional and national damage from loss of

the GBR. If humanity is to contain climate change, the realisation has to come that Queensland's coal mining cannot continue.