

Submission to the Queensland Department of Natural Resources, Mines and Energy - Improving resource approval efficiency consultation

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Healthy planet, **healthy people.**

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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, and public health. We work to prevent and address the diseases – local, national and global - caused by damage to our natural environment. We are a public health voice in the sphere of environmental health with a primary focus on the health harms from pollution and climate change.

DEA has made many submissions in relation to the impacts on health and the environment of resource development in Queensland. Some are detailed in Appendix A.

We are responding to the “Improving resource approval efficiency consultation” (see Appendix B) which does not include mention of the word “health”. Presumably it is subsumed under the words “community values”. All resource development carries potential harms to human health, health is a human right and we therefore make this submission.

Recommendations

We recommend that

the Queensland government undertake reform of its resource development assessment processes by independent experts in public health, economics, environment and governance systems.

in the interim, the extensive powers of the Coordinator-General to over-rule Departments and the Land Court be removed and be replaced by a transparent consensus process based on Treasury, Health, Environment and Mining Departments.

Health Impact Assessment

In all states, the Environmental Impact Assessment process should incorporate a Health Impact Assessment (HIA) which includes all aspects of community health, including social and mental health aspects and social disruption. The HIA processes are intended to assess the balance of positive and negative impacts of the development upon which informed decisions can be made.

Historically this Commonwealth responsibility, detailed in the Health Impact Assessment Guidelines (2001) was devolved to states. DEA has serious concerns

about the Environmental Impact Assessment of resource development processes in Queensland. The health impacts of resource development are not properly addressed in the process, and outcomes are not transparent. Furthermore, the extensive powers of the Coordinator-General to overrule all other departments and Court decisions involving medical evidence are inappropriate when human health and lives are at stake. The Coordinator-General's decisions often appear to be those of a proponent of the development, not those of an arbiter.

Poor health outcomes in Queensland

We relate the poor health outcomes in Queensland to poor assessment, regulation and monitoring processes. The recurrence of black lung disease is an indictment as is the emerging evidence of poor health outcomes in gas fields, the prolonged exposure of communities to pollution in the Acland mine, and the exposure of workers to harm from an underground gas project. The flawed approval of water resources in the case of the proposed Adani mine and some other mines is also a potential health hazard.

In the case of the Acland mine it is vital that all governments and politicians read the revelations in the judgement. In a 463 page judgement the Judge said:²

If I were to reduce this matter to its simplest terms, one may wonder how it can be that the NAC revised Stage 3 project has been subject to so much controversy, let alone almost 100 hearing days before this Court, almost 2,000 exhibits containing many tens of thousands of pages of material, and well in excess of 2,000 pages of submissions. [19]

In short, there is a significant mining operation, by a large publicly listed Australian owned mining company, which has been operating for over 15 years and proposes to continue operations for more than a decade into the future by way of a further expansion. [24]

To use a card playing analogy, it would seem to be a 'lay down misere' that the Stage 3 expansion should proceed. This position is only strengthened when one takes into account that the Stage 3 project has both the approval of the State Coordinator-General, as well as that of the Commonwealth Minister for the Environment. [25]

To read the submissions of the objectors in this case, one could be forgiven for thinking that I was dealing with an entirely different case to the circumstances set out above. [28]

The objectors' submissions paint a picture of a mine out of place in the Acland rural agricultural setting. They speak of generation after generation of farmers undertaking agricultural, dairying and grazing activities on lush land with plentiful supplies of rain and groundwater. They talk of the town of Acland with pride, revelling in its winning of Tidy Town's awards, including being the first state-wide winner of the award in 1989, and reflect on the area's strong ties with war veterans, recognised through the war memorial located in Acland. [29]

They speak with sad voices at the loss of the vast majority of the town of Acland through the actions of NAC by purchasing, then removing almost all of Acland's homes and buildings, and complain that the Stage 1 and Stage 2 operations of New Acland have made life a misery for those who live in close proximity to the mine because of what they say to be excesses in dust, noise, vibrations, lighting spill etcetera emanating from the mine. They fear for the future of their groundwater bore supplies. [30]

The objectors complain that their complaints about the mine have been virtually ignored by the mine and government regulators. They say, collectively, that enough is enough, and that Stage 3 should not proceed [31]

We draw attention to the details provided in our submissions on Acland (see Appendix A), and in the following articles *Revelations from the New Acland coal mine case*³ including this by a Queensland medical student, *Acland mine expansion versus human health*⁴.

And to the poor government attention to health outcomes in Queensland which were assessed in relation to coal seam gas development in a DEA Submission to the Commonwealth Parliamentary Select Committee (submission 154) on Certain Aspects of Queensland Government Administration related to Commonwealth Government Affairs, (2014).⁵

And to DEA's Submission to the Australian Government Department of Sustainability, Environment, Water, Population and Communities on the Draft significant impact guidelines: Coal seam gas and large coal mining developments – impacts on water resources.⁶

And to DEA's Submission to the Productivity Commission Major project development assessment processes 2013.⁷

The concerns expressed by DEA in careful analysis of many resource projects are also apparent in submissions by economists and environmental organisations. These detail a failure to use full cost accounting and to recognise environmental degradation and loss of biodiversity and the need for sustainability.^{8,9}

References

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- ¹ <https://www.dnrme.qld.gov.au/mining-resources/initiatives/resource-approval-efficiency-consultation>
 - ² <https://archive.sclqld.org.au/qjudgment/2017/QLC17-024.pdf>
 - ³ <https://reneweconomy.com.au/revelations-new-acland-coal-mine-case-82775/>
 - ⁴ <https://reneweconomy.com.au/acland-mine-expansion-versus-human-health-36519/>
 - ⁵ <https://www.dea.org.au/wp-content/uploads/2017/03/Certain-Aspects-of-QLD-Government-Administration-Submission-11-14.pdf>
 - ⁶ <https://www.dea.org.au/wp-content/uploads/2017/11/CSG-and-large-coal-mining-impacts-on-water-resources-submission-07-13.pdf>
 - ⁷ <https://www.dea.org.au/wp-content/uploads/2013/04/Major-Project-Development-Assessment-Submission-04-13.pdf>
 - ⁸ <https://www.dea.org.au/wp-content/uploads/2018/04/United-Nations-Sustainable-Development-Goals-SDG-Submission-03-18.pdf>
 - ⁹ <https://www.dea.org.au/wp-content/uploads/2018/09/Australia%27s-faunal-extinction-crisis-submission-08-18.pdf>

Appendix A: DEA submissions on Queensland resource developments and related issues

Adani Infrastructure's North Galilee Water Scheme (NGWS) Project; EPBC 2018/8191

Jun-18

[https://www.dea.org.au/wp-content/uploads/2018/06/EPBC-2018-8191_North-Galilee-Water-Scheme-\(NGWS\)-Project-06-18.pdf](https://www.dea.org.au/wp-content/uploads/2018/06/EPBC-2018-8191_North-Galilee-Water-Scheme-(NGWS)-Project-06-18.pdf)

Response to Central Queensland Coal Project (Styx) Supplementary EIS

Jun-18

<https://www.dea.org.au/wp-content/uploads/2018/06/Response-to-Styx-Coal-Project-06-18.pdf>

Submission to the Senate on the Inquiry into the United Nations Sustainable Development Goals (SDGs)

Mar-18

<https://www.dea.org.au/wp-content/uploads/2018/04/United-Nations-Sustainable-Development-Goals-SDG-Submission-03-18.pdf>

Submission to the Proposed Central Queensland (Styx) Coal Project

Dec-17

<https://www.dea.org.au/wp-content/uploads/2017/12/Submission-to-the-EIS-Central-Queensland-Coal-Project-Styx-12-17.pdf>

Certain Aspects of Queensland Government Administration related to Commonwealth Government Affairs

Nov-14

<https://www.dea.org.au/wp-content/uploads/2017/03/Certain-Aspects-of-QLD-Government-Administration-Submission-11-14.pdf>

New Acland Coal Mine Stage 3 EIS Submission

Feb-14

https://www.dea.org.au/wp-content/uploads/Acland_Stage_3_EIS_Submission_02-14.pdf

Carmichael Coal Mine and Rail Project EIS and Supplementary EIS

Dec-13

https://www.dea.org.au/wp-content/uploads/Carmichael_Coal_Mine_and_Rail_Project_SEIS_Submission_12-13.pdf

Warratah Coal's China First Project (Northern Export Facility) SEIS

May-13

https://www.dea.org.au/wp-content/uploads/Waratah_Coal_-_China_First_SEIS_Submission_05-13.pdf

EIS for Arrow Energy's Bowen Gas Project

Apr-13

Adani - Abbot Point Coal Terminal 0 EIS

Apr-13

https://www.dea.org.au/wp-content/uploads/Adani_Abbot_Point_Coal_Terminal_0_Submission_04-13.pdf

Productivity Commission Major project development assessment processes

Apr-13

<https://www.dea.org.au/wp-content/uploads/2013/04/Major-Project-Development-Assessment-Submission-04-13.pdf>

Carmichael Coal Mine and Rail Project Environmental Impact Statement

Feb-13

[https://www.dea.org.au/wp-content/uploads/Carmichael Coal Mine and Rail Project Submission 02-13.pdf](https://www.dea.org.au/wp-content/uploads/Carmichael_Coal_Mine_and_Rail_Project_Submission_02-13.pdf)

New Acland Coal Mine Stage 3: Draft terms of reference for an environmental impact statement

Feb-13

<https://www.dea.org.au/wp-content/uploads/2013/02/New-Acland-Stage-3-Submission-02-13.pdf>

China Stone Coal Project

Dec-12

<https://www.dea.org.au/wp-content/uploads/2012/12/China-Stone-Submission-12-12.pdf>

Carmichael Coal Mine and Rail Project Draft TOR for an EIS

Mar-11

https://www.dea.org.au/wp-content/uploads/Carmichael_submission.pdf

Appendix B

Improving resource approval efficiency consultation

We are investigating opportunities to improve the efficiency and timeliness of resource approval processes. We want to ensure that private investors and other resource stakeholders feel that it is easy to do business and engage with the Queensland Government.

We are motivated to reduce duplicative process and to deliver efficient services, but not at the risk of impacting on the rights of our community or environmental values.

We listen to our industry partners and communities. This process will commence by seeking views from industry and members of the community who are invited to submit ideas, which will inform future policy development.

About Queensland's resource industry

Queensland is a mature resource jurisdiction, rich in mineral and energy resources.

Resource development is essential to our economy, earning billions of dollars in royalties each year, creating and supporting thousands of jobs, and attracting investment and infrastructure development into regional Queensland.

Why we are doing this

We recognise that to remain globally competitive as a destination for resource investment, we must review and, where appropriate, implement more efficient and effective ways of doing business; while retaining our strong environmental protection framework and maintaining social license.

We are opening a dialogue with industry and the community to identify areas in the assessment and approvals processes for mineral and energy resources projects where duplication of effort occurs or efficiencies can be achieved.