

Environmental Protection and Other Legislation Amendment Bill 2022

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Committee Secretary
Health and Environment Committee
Parliament House
George Street
Brisbane Q 4000
By email HEC@parliament.qld.gov.au

Inquiry into the Environmental Protection and Other Legislation Amendment Bill 2022

Dear Secretary

Please accept this submission on behalf of Mackay Conservation Group (MCG), an environmental organisation in the Mackay-Isaac-Whitsunday Region of Central Queensland. MCG has existed since 1984 to provide a voice for the community on matters affecting the environment.

MCG generally supports the amendments in the bill. We note that other environmental organisations, in particular the Environmental Defenders Office, have raised concerns which we agree with. However, in relation to the amendment to Section 143 we would like to add particular comments.

The current s.143 provides that the department may choose to require production of an EIS in particular circumstances. s.143(3) says that the standard criteria must be considered in making a decision whether an EIS will be required. We understand the standard criteria to be contained in the guideline *Criteria for environmental impact statements for resource projects under the Environmental Protection Act 1994*.

The criteria provides for various thresholds before an EIS is triggered, such as removal of 2 million tonnes of ROM ore or coal each year. MCG is concerned that the arbitrary thresholds are inappropriate. We have observed examples where the guideline did not establish conditions to require an EIS, yet the proposed resource operation would impact on habitat of listed species.

DES has assured us that when no EIS is required, other equally rigorous processes can be undertaken to ensure that good environmental outcomes are achieved. However, in at least one case we have been alerted to serious concerns raised by the Independent Expert Scientific Committee in regard to the analysis of a project that did not require an EIS.

MCG urges the committee to recommend amendment of the EP Act to ensure an EIS is required for all site specific resource projects. We also request that the guideline *Criteria for Environmental Impact Statements for Resource Projects* be amended to require all mining projects, including greenfield and expansion proposals, be assessed by an EIS.

Once again, thank you for permitting us to comment on this important legislation.

Yours sincerely

Peter McCallum
Coordinator, Mackay Conservation Group