

Hon Tanya Plibersek MP
Minister for the Environment and Water
c/- Department of Climate Change, Energy, the Environment and Water

21 May 2024

Dear Minister,

RE: Comment on Referral: Barada Barna Road Upgrade (EPBC 2024/09791)

Thank you for the opportunity to make this submission in response to the referral of the proposed upgrade of Barada Barna Road (associated with the Olive Downs Coking Coal Project) (**the Project**) proposed by Pembroke Olive Downs Pty Ltd (**the Proponent**) under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*.

Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (**EnvA**) is a Central Queensland association concerned about the risks associated with coal mining, coal seam gas and climate change.

We are also particularly concerned about the future of biodiversity in Central Queensland. The development of coal and gas facilities are resulting in the loss of large areas of habitat for threatened species and communities, which are further impacted by the extreme weather events due to climate change impacts.

The proposed action

The Proponent is operating the Olive Downs Project, a metallurgical coal mine and associated infrastructure within the Bowen Basin, located approximately 40 km south-east of Moranbah, Queensland.

The proposed Project is the upgrade of Barada Barna Road to accommodate heavy vehicle use and maintain safety standards during the construction and operation of the Olive Downs Coking Coal Project.

Barada Barna Road

Barada Barna Road (previously named Daunia and Annandale Road) is a locally controlled road managed by Isaac Regional Council (**IRC**). Barada Barna Road intersects with the Peak Downs Highway in the north, runs south-east, crossing the Coppabella to Gregory Junction railway and continues in a south to south-east direction for approximately 30 km, before culminating at the intersection of Iffley Connection Road.

Peak Downs Highway is the main link between Queensland's Whitsunday Coast and the Central West region of the state, linking the localities of Mackay and Clermont. The Peak Downs Highway is a primary access route for workers, fuel, machinery and other supplies to the coal mines of the Bowen Basin. Barada Barna Road provides access to the Moorvale South Mine and Olive Downs Project.



The Proponent has identified that an upgrade to Barada Barna Road is required to allow for safe heavy vehicle use. In 2019, the Proponent entered into an Infrastructure Agreement with IRC to upgrade the road to standards compliant with Council's requirements. This proposed Project relates to the Olive Downs Project, in that Olive Downs Project related traffic will use Barada Barna Road to access the Olive Downs mine. The upgraded road would be used to access the Olive Downs Complex during the operation of the mine (until approximately 2085) but would not be "decommissioned" at the end of mine.

The proposed upgrades will be undertaken along a 30 km section of road and will include:

- realignment and widening of the road pavement to 8.4 metres to the top of subbase level (the existing roads are approximately 5 meters wide),
- upgrading the Goonyella Railway System rail crossing, located approximately 6 km south of the Peak Downs Highway,
- upgrading three private property access intersections,
- upgrading the Moorvale South quarry haul road intersection,
- installation of fencing along the boundary of the road reserves where required by landholders and replacement fencing where fencing is already exists,
- removal of cattle grids that would no longer be required, due fencing along the entire road reserve, and
- installation of culverts.

The disturbance footprint of the Project is 169.1 ha. The Proponent claims to have designed the Project to limit the impacts on matters of national environmental significance (**MNES**).

The Proponent acknowledges that this mine expansion will significantly impact on listed threatened species and communities (ss 18 and 18A of the EPBC Act).

ENVA'S SUBMISSION

1. EnvA recommends that the Minister decides that this project is considered a controlled action due to significant residual impacts on:
 - (a) Listed threatened species and communities (ss 18 and 18A), and
 - (b) Listed migratory species (ss 20 and 20A).
2. We further recommend that the proponent be required to provide more relevant mitigation measures. The application only includes mitigation measures as outlined in the MNES management plan for the Olive Downs Project. Aspects such as wildlife-friendly fencing, same road crossings between vegetated areas and road signage should be considered as a minimum for a road development.

Further recommendations are provided in our grounds for submission below.

GROUNDNS FOR SUBMISSION

Significant impact on threatened species and communities

The project would or has the potential to impact on numerous threatened species and communities listed under the EPBC Act:

- Squatter pigeon (southern) (*Geophaps scripta scripta*) (Vulnerable)
- Latham's snipe (*Gallinago hardwickii*) (Vulnerable, migratory)
- Common greenshank (*Tringa nebularia*) (Endangered, migratory)
- Sharp-tailed sandpiper (*Calidris acuminata*) (Vulnerable, migratory)
- Australian painted snipe (*Rostratula australis*) (Endangered)
- Ornamental snake (*Denisonia maculata*) (Vulnerable)
- Koala (*Phascolarctos cinereus*) (Endangered)
- Greater glider (*Petauroides volans*) (Endangered)
- *Polianthion minutiflorum* (Vulnerable)

The Proponent acknowledges that there will be potential significant impacts on 28.75ha of koala habitat, 13.74ha of greater glider habitat and 5.14ha of ornamental snake habitat.

EnvA considers that the impacts on all the listed species and communities listed above should be the subject of more detailed assessment to fully identify the direct, indirect, habitat fragmentation and cumulative impacts that are likely to occur. Hence, we consider that all the above listed threatened species and communities should be listed as controlling provisions.

Significant impact on migratory species

Three listed migratory species were identified as potentially occurring in the Project area:

- Latham's snipe (*Gallinago hardwickii*) (Vulnerable, migratory)
- Common greenshank (*Tringa nebularia*) (Endangered, migratory)
- Sharp-tailed sandpiper (*Calidris acuminata*) (Vulnerable, migratory)

The Proponent has identified that this project will have a direct impact on the habitat of these migratory species in section 4.1.4 of their application. However, section 4.1.5 of their application indicated that there will be no direct impact. This is in part justified in section 4.1.5.3 by avoiding the wetland habitat. Further information on the direct, indirect, habitat fragmentation and cumulative impacts on the above listed migratory species is required to provide more informed comment.

EnvA considers that the impacts to these species should be properly assessed, and migratory species identified as a controlling provision.

Thank you again for the opportunity to make comment on this proposal.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland