



EPBC Referral Department

Email: EPBC.Referrals@dcceew.gov.au

Date: 14 November 2023

Re: Submission to the Borumba Pumped Hydro Energy Storage Project EPBC referral

Dear Sir or Madam,

As Queensland's peak environment NGO, the Queensland Conservation Council (QCC) welcomes the opportunity to provide the following comments and recommendations regarding the referral of the Borumba Pumped Hydro Energy Storage (BPHES) Project under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC 2023/09646).

1. Comments

1.1 Justification for declaring project as a controlled action

If approved and constructed, the proponent for the BPHES project has correctly identified that their proposed project will cause direct, indirect and significant residual impacts to several threatened fauna and flora species listed under the *Environment Protection and Biodiversity Conservation Act 1999* (the Act), which triggers the controlling provisions under s18 (Threatened Species and Ecological Communities) and s20 (Migratory Species) of the Act.

As it will cause adverse impacts to Threatened Species and Ecological Communities and Migratory Species justifies the BPHES project being declared as a Controlled Action under the Act.

1.2 Other controlling provisions

Along with triggering s18 and s20 of the Act, QCC believes the proposed BPHES project also triggers the following controlling provisions:

- **Ramsar Wetlands (s16).** If constructed, the proposed BPHES project could substantially alter flow regimes that support flow dependent species and ecosystems which underpin the ecological health of the Great Sandy Straits Ramsar Listed Wetlands

- **Commonwealth Marine Area (S23).** If constructed, the proposed BPHEs project could substantially alter flow regimes that support flow dependent species and ecosystems in the Mary River and estuary, which underpin the ecological health and productivity of Commonwealth Marine Areas and,
- **Great Barrier Reef (S24B).** If constructed, the proposed BPHEs project could substantially alter flow regimes that support flow dependent species and ecosystems in the Mary River and estuary, which underpin the ecological health and productivity of the Great Barrier Reef.

1.3 Require proponent to assess cumulative impacts

In addition to assessing direct, indirect and significant residual impacts to MNES, the proponent should also be required to assess the cumulative impacts that could potentially occur to MNES from their proposed project.

2. Recommendations

- Declare the proposed BPHEs project as a Controlled Action under the Act,
- Assess the proposed BPHEs project under sections 16, 18, 20, 23 and 24B of the Act,
- Require the proponent to assess cumulative impacts that could potentially occur to MNES from their proposed project

3. Conclusion

Please do not hesitate to contact me should you require any further information or clarification regarding the matters raised in this submission.

Yours sincerely,

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