



EPBC Act Department

Date: 23<sup>rd</sup> November 2023

**Re: Submission to Capricornia Energy Hub Pumped Hydro Energy Storage EPBC Act 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 on the referral of the Capricornia Energy Hub (CEH) Pumped Hydro-electric Energy Storage (PHES) Project under the EPBC Act 1999 (EPBC 2023/09626).

**1. Comments**

If approved and constructed, the proponent for the CEH PHES project has identified in their EPBC referral documentation that the CEH PHES project will cause direct, indirect and significant residual impacts to several threatened fauna and flora species listed under the EPBC Act 1999 (the Act) that trigger the Threatened Species and Ecological Communities (s18) and Migratory Species (s20) controlling provisions of the Act, which QCC fully believes justifies the CEW PHES project being declared as a Controlled Action under the Act.

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

- **Ramsar Wetlands (s16).** If constructed, the proposed CEW PHES project will potentially alter flow regimes in the Burdekin River, which could substantially reduce transfer of coarse sediment from the Burdekin River to the marine environment that provides a critical role in replenishing sand loss along the Burdekin Haughton floodplain and the southern shore line of Cape Bowling Green. Any reduction of sand replenishment resulting from the reduction of flows required to transfer coarse sediment to the marine environment will exacerbate erosion that's currently occurring along the Burdekin Haughton floodplain and at Cape Bowling Green, which could be breached as consequence of sand starvation. If it occurs, the breaching of Cape Bowling Green will alter the tidal dynamics in Bowling Green Bay, which will potentially change the ecological characteristics of the Bowling Green Bay Ramsar listed wetlands,

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

In addition to assessing direct, indirect and significant residual impacts to the above-mentioned controlling provisions, the proponent should also be required to assess the cumulative impacts that could potentially occur to MNES from their proposed project alongside other development proposals in the Burdekin Basin such as the proposed Pioneer Burdekin PHES project, raising of Burdekin Falls Dam, other renewable energy projects, new coal mines and the transmission line infrastructure for this project (EPBC 2023/09627).

## 2. Recommendations

- a) Declare the proposed CEH PHES project as a Controlled Action under the Act,
- b) Assess the proposed CEH PHES project under sections 16, 18, 20, 23 and 24B of the Act,
- c) Require the proponent to assess the potential cumulative impacts to MNES from their project alongside other proposed development projects in the Burdekin Basin

## 3. Conclusion

While we recognise the need to reduce our emissions by transitioning to renewable energy generation underpinned by deep storage such as PHES as soon as possible to protect Queensland's unique and irreplaceable environmental values, this cannot occur at the expense of the species and ecosystems that we trying to save and protect which is why the adverse impacts potential caused to MNES by the proposed CEH PHES and other similar projects must be assessed to the greatest extent possible.

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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