



WHITSUNDAY
CONSERVATION
COUNCIL

Caring for the future is in our nature

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Council Secretary 0407 207 441

**NOTICE of PROPOSED GRANT of a MINING LEASE
ML 100351 – Dated 11 September 2023 – Ballymore Resources Limited**

OBJECTION – excerpts from Form MRA-20 Version 8 – Submitted 14 December 2023

GROUNDS FOR OBJECTION;

That it is unreasonable and environmentally unsatisfactory that the Department of Environment and Science should approve an application to have existing Environmental Authority Permit - EPSL00460513 - Effective Date: 19-Nov-2010 amended to add MLA 100351.

It is unacceptable that an application to have an EA approval granted in 2010 extended to cover proposed mining project MLA 100351 for an additional fifteen years without requiring new impact assessments addressing threats to water quality, flora and fauna including endangered and threatened species, and environmental nuisance issues for the residents of the small village of Dittmer.

The Federal government Reef 2050 Water Quality Improvement Plan identifies the Proserpine Catchment area as draining to the Great Barrier Reef and targets have been set to consider land use and pollutant loads from the water catchment area.

The site is situated in the Proserpine Catchment area. The water from this area provides drinking water for Dittmer residents, drains to the Proserpine Dam which provides drinking water to residents of Whitsunday and irrigation for agriculture and finally drains to the waters of the Great Barrier Reef.

The site is also identified as within a Statewide Biodiversity Corridor, habitat for the Endangered Proserpine Rock Wallaby, Northern Quoll and Greater Glider along with endangered and vulnerable plant species, Koala habitat, MSES wildlife habitat, MSES regulated vegetation (essential habitat) and the Proserpine State Forest.

In addition, recent reports made to WCC appear to indicate the proponents may be breach of EPSL 00460513 which is a code compliant EA that requires the EA holder to comply with all conditions of the Eligibility Criteria for Mining Lease Projects. If this is the case, WCC has great concerns for the environmental protection of MLA 100351.

In the circumstances it is unconscionable that an application relying on an EA approval granted thirteen years ago be amended to include MLA 100351, which if granted has a term of fifteen years with the possibility of renewals for terms not exceeding fifteen years.

Until this matter has been addressed, Whitsunday Conservation Council object to the granting of MLA 100351 on the grounds that insufficient environmental protection is being applied to this project by either, or both, the State and Federal governments.

continues;

continued;

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FACTS & CIRCUMSTANCES RELIED ON:

EXCERPT:

Environmental Authority Permit - EPSL00460513 Amendment application - A-EA-AMD-100486450 General Information EA Reference: **EPSL00460513 EA**
Effective Date: 19-Nov-2010 Application Action: Amend Application

https://www.reefplan.qld.gov.au/_data/assets/pdf_file/0023/46058/catchment-targets-mackay-whitsunday-proserpine.pdf

<https://www.reefplan.qld.gov.au/water-quality-and-the-reef/the-plan/review>

<https://www.reefplan.qld.gov.au/science-and-research/the-scientific-consensus-statement>

EXCERPT: Current initiatives will not meet the water quality targets. To accelerate the change in on-ground management, improvements to governance, program design, delivery and evaluation systems are urgently needed. This will require greater incorporation of social and economic factors, better targeting and prioritisation, exploration of alternative management options and increased support and resources.

Attached pdf file; DITTMER - BAMB and geo maps data and maps

NON-COMPLIANCE – EPSL 00460513: WCC has various email evidence that at the instigation of David Marshall, Senior Ranger-Estates Management –Central Region-Queensland Parks and Wildlife Service-Department of Environment and Science, a visit was made 11 Nov 2023 by the QPWS Airlie Beach Ranger-in-Charge to inspect sites of environmental damage in the area.

We are informed that a report is being prepared of the subject sites.

Signed: 12 December 2023



Faye C Chapman
Secretary
Whitsunday Conservation Council
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