

BETWEEN: **WILDLIFE PRESERVATION SOCIETY OF QUEENSLAND  
PROSERPINE/WHITSUNDAY BRANCH INC**  
Applicant

AND: **MINISTER FOR THE ENVIRONMENT AND HERITAGE**  
Respondent

**NOTICE TO ADMIT FACTS**  
(Order 18, rule 2)

To the respondent:

The applicant requires you to admit for the purposes of these proceedings only –

1. Global warming is a complex bio-physical process involving a rise over time in the temperature of the earth's atmosphere due to human activities.
2. The burning of coal to generate electricity generally results in the emission of greenhouse gases contributing to global warming.
3. A principal purpose of the mining of coal from the Isaac Plains Coal Project (EPBC 2005/2070) and Sonoma Coal Project (EPBC 2005/2080) is to sell the coal for burning in coal-fired power stations to generate electricity.
4. The amount of coal mined from the Isaac Plains Coal Project is likely to result in a large amount of greenhouse gas emissions contributing to global warming.
5. The amount of coal mined from the Sonoma Coal Project is likely to result in a large amount of greenhouse gas emissions contributing to global warming.
6. Global warming is likely to have a severe impact on matters protected by Part 3 of the *Environment Protection and Biodiversity Conservation Act 1999*.

If you do not, within 14 days after service of this notice upon you, serve a notice upon the applicant disputing any fact above specified, that fact shall, for the purpose of these proceedings, be admitted by you in favour of the applicant.

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Solicitor for the applicant  
19<sup>th</sup> July 2005

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NOTICE TO ADMIT FACTS  
Filed on behalf of the applicant  
Form 25, Order 18, rule 2

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