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

15 November 2022

Dear Minister,

RE: Support for the reconsideration of the Valeria project (EPBC 2021/9077)

Environmental Advocacy in Central Queensland (EnvA) considers that there is substantial new information available about the impacts this proposed Project has, will have and is likely to have on matters protected under Part 3 of the Environmental Protection and Biodiversity Conservation Act 1999 (EPBC Act).

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.

EnvA believes that decisions to allow the opening new and expanding coal and gas projects:

- are contrary to meeting Australia's emission targets and Queensland's emission targets – both are far too low to prevent continued harm to our environment,
- are likely to result in irreparable damage to our local landscape and result in stranded assets,
- will put our local community at further risk of extreme weather such as increasing the intensity and frequency of storms, floods, droughts and bushfires,
- will damage our significant coastal resources including our beaches, wetlands and the Great Barrier Reef through storm surge and increased coral bleaching events,
- will further degrade wildlife habitats of state and national significance through both habitat loss and climate change,
- will place additional conservation pressure on threatened wildlife through heat related stress and from the more frequent and severe extreme weather events such as drought, fire, storms and floods, and
- rarely take into consideration the views of Traditional Owners and local communities who are concerned about protecting their land from fossil fuel development.

The proposed project (the Project)

Glencore's subsidiary, Valeria Coal Holdings, proposes to construct and operate a greenfield open cut thermal and metallurgical mine consisting of:

- six open cut pits, a workers accommodation village, mine access road and initial sections of the rail line, water supply pipeline, powerline and communications infrastructure
- a mine infrastructure area (MIA) consisting of a coal handling and preparation plant (CHPP), tailings storage facilities, mine water management dams, waste rock dumps, storage facilities, sewage treatment plant, office buildings and amenities.

The mine site area covers approximately 28,200 ha with a disturbance area of approximately 10,000 ha, and is located approximately 27 kilometres north-west of Emarald, within the Bowen Basin mining region. There are four other components of the proposed development which will also impact on the environment but not subject to this current reconsideration:

1. Approximately 70km of rail line infrastructure between the mine site and the Aurizon Goonyella Coal Chain.
2. Water supply pipeline infrastructure from the mine site to the Oaky Creek Coal Mine.
3. Communication infrastructure from the mine site to the Gregory Highway.
4. Powerline infrastructure from the mine site to the Ergon Powerline.

The Project has been gazetted as a coordinated project under the *State Development and Public Works Organisation Act 1971* (Qld).

The Project has also been identified as a controlled action under the *Environmental Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**). The relevant Matters of National Environmental Significance (MNES) identified were:

- listed threatened species and communities (EPBC Act, sections 18 and 18A), and
- a water resource, in relation to coal seam gas development and large coal mining development (sections 24D and 24E).

The Project will have direct impacts on threatened species and communities and water resources.

There is now available substantial evidence (as provided in the reconsideration request) that climate change is a significant threat to an overwhelming number of listed threatened species and communities. The Project with a yield of up to 16 million tonnes per annum of product coal for approximately 35 years, or approximately 560 million tonnes of coal over the life of the mine, and will result in the release of approximately 1.3 billion tonnes of greenhouse gas (GHG) emissions over the life of the mine.[1] The information on the impacts of climate change provided with the reconsideration request was not considered at the first decision for this project and must be included in the reconsideration process.

Significant impact of GHG emissions on MNES

The Project will emit GHGs which, cumulatively will increase global temperature, resulting in significant adverse impacts to MNES as identified in the substantial new information.

Australia, and of particular concern to EnvA, Central Queensland (where this mine is proposed), is already experiencing climate change impacts that include an increased frequency and severity of coral bleaching, storms, heat waves and wildfires, and an increase in the number of endangered species and ecosystems. If warming increases to 1.5°C and above, these impacts will increase in severity.

Therefore, it is our submission that the GHG emissions of this Project, and the warming effect of those GHG emissions, will have a significant impact on the following MNES which need to be included as controlling provisions:

(a) World Heritage (ss 12 and 15A);
(b) National Heritage (ss 15B and 15C);
(c) Ramsar Wetlands (ss 16 and 17B);
(d) Listed threatened species and communities (ss 18 and 18A);
(e) Listed migratory species (ss 20 and 20A);
(f) Commonwealth marine areas (ss 23 and 24A);
(g) Great Barrier Reef Marine Park (ss 24B and 24C); and
(h) Water resources (ss 24D and 24E).

The specific details and context of the direct and indirect impacts the Project will have on each relevant MNES in Central Queensland is detailed further below.

[1] Determined using an estimate of total product volume of coal x 2.4.

Significant Impact on Declared World Heritage Properties

The Project's GHG emissions and resulting contribution to climate change will significantly and adversely impact on the Great Barrier Reef World Heritage Property. Climate change has been identified as the greatest threat facing the Reef.

The World Heritage Committee is considering relisting the Great Barrier Reef as Endangered following multiple mass bleaching events over the last few years. It is critical that the Reef is protected from climate change which requires immediate and urgent action to reduce GHG emissions to maintain warming to 1.5°C.

The impacts from the proposed 1.3 billion tonnes of GHG emissions on the Great Barrier Reef must be considered for this Project.

See also the section on impacts to the Great Barrier Reef Marine Park below.

Significant Impact on National Heritage

The Project's GHG emissions and resulting contribution to climate change will have a significant impact on multiple Australian National Heritage sites as identified in the new information.

Of particular interest to EnvA is the highest level of protection for the Great Barrier Reef which is on our doorstep and a valuable economic and recreational asset in our region.

Fraser Island (K'gari) is already being significantly impacted by climate change. Long term increases in sea-levels are expected to cause disruptions to sand supply, erosion and sea water inundation. Climate change may also contribute to increased frequency of high temperature burns on the island, which can disrupt key ecological processes and communities, notably rainforests.[2]

Another Queensland National Heritage site which will be significantly impacted by climate change is the Wet Tropics of Queensland. Climate change presents a danger to the region's biodiversity and associated endemic species. Weather changes brought on by climate change could seriously affect plant and animal species vulnerable to a warmer and more variable climate, and impact cloud stripping and associated water cycles.[3] More frequent and severe heatwaves could have rapid, catastrophic impacts on the number of tree-dwelling mammals in some high elevation locations, and the risk of more intense cyclones could further disrupt ecosystem structure and function.[4]

The above examples demonstrate that GHG emissions and their influence on global warming and the resulting impacts of climate change are a serious threat to National Heritage sites.

Significant Impact on Ramsar Wetlands

The Project's GHG emissions and resulting contribution to climate change will have a significant impact on Ramsar Wetlands. Climate change has the potential to cause degradation and lead to the reduction or loss of the critical services and benefits of Ramsar Wetland sites in Australia.

Of particular interest to EnvA is the Shoalwater and Corio Bay Ramsar listed wetlands. The site is one of the largest and most ecologically rich coastal wetland sites in Queensland. This near pristine area covers over 200,000 hectares and stretches along 330 kilometres of coastline here on the central Queensland coast. The wetlands are especially rich in wildlife because tropical and subtropical species overlap on Queensland's central coast. Many wetland types are found in this Ramsar Wetland including:

- fringing coral reefs
- shallow open water with seagrass beds
- rocky shores, beaches and sandbars
- intertidal mudflats and sandflats
- mangrove forests and melaleuca woodland, and
- freshwater lagoons, swamps and streams on elevated sandplains[5].

[2] Queensland Government, *Climate Change Pressure on Fraser Island* (September 2021).
[3] Queensland Government, *Climate Change Pressure on the Wet Tropics of Queensland* (September 2021).
[4] Queensland Government, *Climate Change Pressure on the Wet Tropics of Queensland* (September 2021).
[5] https://rsis.ramsar.org/ris/792

Extended drought means vegetation loss and reduced amounts of open water which reduces the availability of waterbird habitat. Reduction of water volumes and flood frequency may also lead to stagnation of wetlands and changes to nutrient cycling.

Climate change will impact all elements of the water cycle of the region. Reduced rainfall and hotter temperatures produce less water for rivers and storages. Drier soils result in less run-off to waterways, and more evaporation occurring from rivers, channels and storages.

All Ramsar Wetland sites will be significantly impacted by climate change as identified in the substantial new information provided with the reconsideration request.

Significant impact on listed threatened species and communities

The Valeria Initial advice statement identifies numerous threatened ecosystems and plant and animal species. EnvA believes that the direct impacts from habitat clearing approximately 10,000 ha of land on listed threatened species and communities alone is unacceptable, and when the additional identified impacts from climate change are considered, this Project should not proceed.

Koalas and greater gliders have recently been listed as endangered in Queensland (previously vulnerable). They are threatened clearing, and also by the increased frequency and intensity of drought, high temperatures and bushfires. Further species are likely to be added to the endangered list as clearing is allowed to continue and global warming places further pressure on their survival. Forecasting models predict that a large area of koala habitat may be lost, accompanied by a large reduction in the koala population, under current climate change projections[6].

The Minister should ensure that the impacts of climate change on all threatened species and ecosystems are considered along with the direct impacts from habitat loss if we are to improve our State of the Environment[7].

Significant Impact on listed migratory species

Valeria have identified 12 listed migratory species which may occur on, or near the Project site. The Project's GHG emissions and resulting contribution to climate change will also impact on many listed migratory species in a much broader area[8].

Climate change threatens 147 migratory species protected in Australian waters under international agreements, including mammals such as dugongs, whales and dolphins, migratory birds, reptiles such as marine turtles, and sharks – many of which occur in Central Queensland.

This Project will have a significant impact on listed migratory species through both direct loss of habitat and impacts to a broader number of migratory species outside of the proposed mine site due to climate change.

Significant Impact on the Great Barrier Reef Marine Park

The Project's GHG emissions and resulting contribution to climate change will have a significant impact on the environment in the Great Barrier Reef Marine Park.

More specifically, the impacts on the Great Barrier Reef of global warming increasing above 2°C have been predicted with very high confidence to include annual bleaching which will result in 'widespread decline and loss of structural integrity'.[9]

In addition, the submission that the Project will have a significant impact on the environment in the GBRMP is strongly supported by the State Party Report on the state of conservation of the

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[6] *Conservation Advice, Phascolarctos cinereus (Koala) combined populations of Queensland, New South Wales and the Australian Capital Territory* (effective 12 February 2022)

[7] State of the Environment Report (2021)

[8] Living Wonders migratory species evidence

[9] IPCC, 2022: Technical Summary. In *Climate Change 2022: Impacts, Adaptation and Vulnerability*. Contribution of Working Group II to the Sixth Assessment Report of the Intergovernmental Panel on Climate Change, p 25.

Australia's Great Barrier Reef[10], as well as by a Position Statement released by the Great Barrier Reef Marine Park Authority in 2019, which notes that:

"Climate change is the greatest threat to the Great Barrier Reef. Only the strongest and fastest possible actions to decrease global greenhouse gas emissions will reduce the risks and limit the impacts of climate change on the Reef. Further impacts can be minimised by limiting global temperature increase to the maximum extent possible and fast-tracking actions to build Reef resilience".

Significant Impact on Water Resources

Valeria notes that the Project has the potential to impact surface water resources through direct disturbance associated with open cut mining, diversion of drainage features, creation of new temporary and permanent landforms that affect flood waters and (if required) through release of water to the surrounding environment.

Impacts to surface water resources may include: changes to catchment areas and flow characteristics due to the construction of (for example) water storage dams, mine infrastructure, waste rock emplacements, flood levees, open cut pits, upstream diversions and final voids; impacts to other water users in the region; and potential extraction and/or discharge of water as part of the on-site water management system.

The Project also has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent aquifers due to changes in hydraulic gradients. Potential impacts to groundwater resources may include: potential drawdown of groundwater aquifers, alteration of groundwater flow directions and decrease in baseflow to surface water systems; localised effects on groundwater quality; and long-term changes to groundwater levels and flow direction in the vicinity of final voids.

The Project's GHG emissions and resulting contribution to climate change will have a significant impact on water resources. Climate change threatens Australia's water resources, as rainfall patterns are shifting, and the severity of floods and droughts has increased.

Droughts are becoming more severe due to drier, hotter conditions, leading to declines in soil moisture due to increased water loss from plants and soils. Reduced rainfall and hotter conditions have led to less runoff into streams, rivers, lakes and dams, which results in a loss of freshwater and riparian habitat and a loss of connectivity between waterways. The consequences for freshwater species and threatened species that are reliant on riparian vegetation (particularly in drought times) are projected to be severe.

CONCLUSION

The GHG emissions and resulting climate change impacts of the Valeria Project are likely to have a significant impact on a number of MNES.

We submit that the Minister should find that the Project is a controlled action with the following applicable controlling provisions, and that the proponent be required to appropriately assess the 'real' impacts of this Project:

(a) World Heritage (ss 12 and 15A);
(b) National Heritage (ss 15B and 15C);
(c) Ramsar Wetlands (ss 16 and 17B);
(d) Listed threatened species and communities (ss 18 and 18A);
(e) Listed migratory species (ss 20 and 20A);
(f) Commonwealth marine areas (ss 23 and 24A);

[10] State Party Report on the state of conservation of the Australia's Great Barrier Reef, 2022

(g) Great Barrier Reef Marine Park (ss 24B and 24C); and
(h) Water resources (ss 24D and 24E).

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

Kind regards

Dr Coral Rowston
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Environmental Advocacy in Central Queensland