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RE: Submission on Referral - Queensland Pacific Metals (QPM) Energy Project - EPBC no: 2022/09329

Thank you for the opportunity to make this submission in response to the referral of Queensland Pacific Metals (QPM) Energy Project (the Proposed Action) by QPM Energy Pty Ltd under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act).

Environmental Advocacy in Central Queensland

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. The comments made in this submission have mostly been restricted to the impacts on our local (Central Queensland) environment.

The Proposed Action

QPM Energy Pty Ltd (**QPM**) proposes to develop the QPM Energy high-pressure gas pipeline and gas compression facility (**the Project**) located approximately 43km north of Moranbah.

The proposed action involves the construction and operation of a gas compression facility (**GCF**) and a high-pressure pipeline that links the proposed GCF to the nearby existing North Queensland Gas Pipeline (**NQGP**). The Project intends to collect fugitive emissions from adjacent coal mines to be processed at the GCF. The gas will then be transported via the proposed pipeline into the NQGP and up to Townsville where it will be distributed by a third party to industrial users.

The GCF has a disturbance area of 65 ha including:

- 6 ha for the GCF,
- 51 ha for the 16.8km pipeline, and
- 8 h for the provision of a road access to the GCF.

While EnvA commends QPM's actions in respect of the capture and use of fugitive emissions from coal mines rather than opening further fossil fuel projects, and QPM's TECH Project in the production of battery nickel and cobalt, we remain opposed to the project for the reasons outlined below.



GROUNDINGS FOR SUBMISSION

Contribution to climate change through GHG emissions

The Project will negatively contribute to climate change and global warming through greenhouse gas (GHG) emissions resulting from the proposed activities.

The accretion of GHGs in the atmosphere due to human activities has already caused changes in the climate system with tangible impacts, including in Queensland which is increasingly experiencing extreme weather patterns and climate related disasters.¹

Of particular concern to EnvA, Central Queensland is already experiencing adverse climate change impacts including:

- increased frequency and severity of coral bleaching,
- severe storms,
- prolonged and extreme heat waves,
- unprecedented 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.

Again, we acknowledge that the Project will be capturing coal mine methane from nearby coal mines, but there is no detail provided on which coal mines will be aligned with the Project or any detail on the infrastructure required to transfer coal mine methane to the GCF.

The scientific consensus is clear. The expansion of fossil fuel production must be stopped to reduce global GHG emissions and avoid the potentially catastrophic impacts of unmitigated global warming and climate change.² EnvA supports the scientific evidence that we must rapidly transition away from fossil fuels and hold concerns that additional gas infrastructure will delay the essential transition to clean energy.

With the lack of information on the source of the coal mine methane, it is unclear that the purpose of the gas pipeline is solely for the purposes of capturing coal mine methane and not a staged component of further coal seam gas projects in the region.

Recommendations

EnvA recommends that further detail is provided on:

- The proposed sources of the coal mine methane;
- The longevity of the mines and the volumes of the coal mine methane to be extracted from each of the coal mines;
- An assessment of the environmental impacts of the additional infrastructure required that are not covered in the current assessments;
- Confirmation that the facility is only for the collection of coal mine methane and not part of a staged expansion of the coal seam gas development in the Bowen Basin; and
- Decarbonisation plans for the QPM TECH Project which will be the recipient of the gas from this Project.

¹ [Ian Cresswell, Terri Janke and Emma Johnston \(2021\), Australia State of the Environment Report](#)

² UN Environment Programme, *Production Gap Report 2021* Intergovernmental Panel on Climate Change, *Climate Change 2022: Mitigation of Climate Change – Technical Summary* (Report, 2022) 52.

Impacts on listed threatened species and communities and listed migratory species

The Proposed Action has been declared as a controlled action due to direct impacts on listed threatened species and communities. A total of 21 threatened fauna species, five threatened flora species, and four threatened ecological communities were identified over a desktop study of the project area.

Table 8.2 of the report outlines the direct impact on Matters of National Environmental Significance (MNES) including:

- 0.8 ha of brigalow threatened ecological community,
- 55.6 ha of ornamental snake habitat,
- 30 ha of squatter pigeon habitat,
- 5 ha of koala habitat,
- 65 ha of white-throated needletail habitat,
- 65 ha of fork-tailed swift habitat, and
- 36 ha of Latham's snipe habitat.

It is recognised that the initial footprint of the Proposed Action will reduce by nearly half after construction is completed and that land will be rehabilitated. However, the Proponent recognises that the vegetation re-established over the pipeline cannot be deep-rooted and thus, limits the rehabilitation of that area to grasslands. This does not restore the original vegetative profile of the area and therefore, will impact on the biodiversity of the Project Area.

The Project is located in the Isaac River Catchment in a region with many coal mines and a growing number of gas facilities. QPM notes that cumulative impacts are unknown and unpredictable, and that most of the impacts caused by the Project are permanent.

EnvA appreciates that it is challenging to determine how many small impacts to wildlife habitat can be tolerated before the conservation status of any species is impacted. We do note that in this region, there have been many species placed on the endangered species list due to cumulative impacts. The Australian government has committed to protecting wildlife from extinction – being listed as endangered is the next step closer to extinction and hence all habitat becomes critical to protect.

QPM is required to offset, at a minimum, 227 ha of ornamental snake habitat under the EPBC Act, and 12.16 ha of endangered regional ecosystem 11.4.9 under the *Environmental Protection Act 1994* (Qld).

Offsets are typically of minimal success, short duration, and certainly do not address the cumulative impacts from the loss and disturbance of habitat in areas such as the Bowen Basin. EnvA is concerned that the proposed offset areas have not yet been confirmed.

Recommendations

That QPM:

- identifies and secures the tenure of the proposed land-based offset habitats to provide certainty that the loss and fragmentation of threatened species and communities can be justified;
- prepares a Rehabilitation Management Plan before project commencement and not leave this until 12 months prior to decommissioning; and
- commits to the progressive restoration of existing vegetation communities in all areas of the pipeline easement that can be rehabilitated as soon as possible after construction is completed.

Stranded assets

QPM anticipates the lifespan of these facilities to be 25 years. However, the referral fails to take into consideration the further expansion of cleaner and cheaper renewable energy resources. Climate-related asset stranding due to changes to energy demand from the implementation of new technology and the enforcement of stricter climate policies should be taken into consideration by the proponent and for the approval. As climate legislation and policies tighten around the use of fossil fuels there is substantial possibility that the requirement for the Project will decline and even potentially disappear before the end of its project lifetime³.

EnvA believes that the risk of these assets becoming stranded is considerable as Australia strives for net-zero-emissions in-line with international agreements.

The Project justification relies on the assumption that fossil fuel industries will continue to be a prominent supply of energy for the next 25 years, not taking into consideration the impromptu uptake of cheaper, cleaner energy sources such as renewables. This could therefore, result in the assets becoming stranded and the disruption of habitat for no social or environmental benefit.

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

Kind regards,

A handwritten signature in blue ink, reading 'M Widdowson', with a large, stylized initial 'M'.

Matilda Widdowson
Coordinator
Environmental Advocacy in Central Queensland

³ [Market Forces \(2016\) Stranded Assets.](#)