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CC: QCoal Sonoma Pty Ltd, jgrieves@qcoal.com.au
Department of Environment and Science, CRMining@des.qld.gov.au

29 December 2023

Re: Submission on the proposed amendment to Environmental Authority application (A-EA-AMD-100351574) and the Mining Lease application (ML 700075) for the Sonoma East coal mine

Thank you for the opportunity to make this submission on the proposed Environmental Authority (EA) amendment and Mining Lease Application (ML) for the Sonoma coal mine **(the Project)**.

Environmental Advocacy in Central Queensland (EnvA) is a Central Queensland association with an interest in ensuring that all land use is sustainable and does not significantly impact on the environment. We are particularly concerned about the risks associated with coal mining, coal seam gas and climate change.

EnvA believes that opening new or expanding existing coal and gas projects:

- is contrary to meeting Australia's emission targets and Queensland's emission targets,
- is 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 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, 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 Sonoma East coal mine extension (SE2ML)

QCoal Sonoma Pty Ltd, SJ Sonoma Pty Ltd, CSC Sonoma Pty Ltd and Watami (Qld) Pty Ltd **(the Proponent)** proposes to extend the coal mine through the addition of a new mining lease (ML 700075) to the existing mine. The project would be located approximately 9km south of Collinsville, within the Whitsunday Regional Council area.

The additional mining lease covers an area of approximately 73.7 ha which will increase the size of the overall tenement area to 2,213.8 ha.



The proponent claims that the SE2ML is required to more efficiently extract the coal resources from two of the three current mining lease areas (ML10327 and ML10326).

The proposed SE2ML is proposing a 25-year term, including 5 years of a mining.

EnvA's concerns about this Project and the assessment process

EnvA firmly believes that there is insufficient information provided in the application to thoroughly assess the Project and weigh up the social, environmental and economic cost-benefits. The grounds for our specific concerns and recommendations are outlined below.

Terrestrial ecology

The area proposed to be directly disturbed by the Project is up to 73 ha. The supporting document for the Project has limited information on the terrestrial ecology which will be impacted by this disturbance, or the cumulative impacts from the many new and expanding coal mines in the Bowen Basin and the further impacts from the increase in climate-change induced severe weather events such as droughts, heatwaves, bushfires and severe and frequent storms.

Of concern is that the extent of the investigation into terrestrial ecology values has been limited to a review of WildNet sightings and mapped regional ecosystems. WildNet is not a thorough or accurate record of flora and fauna, and regional ecosystem mapping is at broad scale and cannot be relied on for site specific analysis.

Despite the inadequate field surveys for threatened species and communities, the Proponent has noted that the following species and communities have been recorded from the local area:

- Squatter pigeon (*Geophaps scripta scripta*) – vulnerable (Nature Conservation Act)
- Black ironbox (*Eucalyptus reveretiana*) – vulnerable (Nature Conservation Act)
- *Eucalyptus populnea* open forest with *Acacia harpophylla* and sometimes *Casuarina cristata* (RE 11.9.10) – of concern under the Vegetation Management Act and with an endangered biodiversity status.

EnvA notes that the Proponent considered that the clearing of RE 11.9.10 will be an impact, and that the presence and quality and the need to mitigate impacts will be determined prior to undertaking any clearing activities.

In response to the request for further information, the Proponent refers to a field survey undertaken by Terrestria Pty td in April and May 2023. This information has not been provided to inform our submission and comment this Project. We note that there is potentially new regional ecosystem mapping and field assessment material which indicates that impacts to matters of state environmental significance include:

- 0.8ha of regulated vegetation intersecting a watercourse (RE 11.9.9), and
- 15.1 ha of koala and squatter pigeon habitat.

The response to the request for further information then comments that the three threatened species identified were not observed to currently use the MLA. Without being provided any of the information on the habitat in the Project area, the survey effort or results (including what the third threatened species might be), it is really challenging to provide meaningful public comment.

We also note that the Proponent claims that the disturbance footprint has been amended to avoid the extent of of-concern Regional Ecosystem 11.3.25, but this is not apparent in the documents we have been provided.

EnvA further notes that the [Proponent was granted the original EA approval](#) based on inclusion of conditions requiring further surveys of flora and fauna according to an approved comprehensive survey plan. This approval was granted 20 years ago and there has been a significant loss and fragmentation of habitats since that time. Adequate understanding of threatened species and communities that will be impacted by the Project must be provided prior to any approval, despite historic decisions to delay assessment until after an approval is granted.

Recommendation

That the Project be rejected on the basis that the Project is clearly unacceptable in respect to the insufficient information on the direct and cumulative impacts on threatened species and communities. This has limited the opportunity to satisfy the social licence as the public has not been provided with a finalised project to make comment on.

We further recommend that the proponent be advised to refer the project for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* given the noted potential impacts to matters of national environmental significance and the Proponent's acknowledgement that this is a potential outcome (section 3.2.4).

In the alternative, the Proponent must be required to provide a thorough flora and fauna assessment of the Project area, including an assessment of the cumulative impacts of remnant vegetation clearing and disturbance in the Bowen Basin and make this available for public review and comment.

Rehabilitation

Given that up to 73ha of land will be impacted on this proposed mining lease, including disturbance of drain line vegetation and an area of open cut mining, for a relatively short period of time, EnvA considers that the rehabilitation is inadequate given the impacts on significant environmental values.

The Proponent is proposing to incorporate the rehabilitation of the Project areas into the Rehabilitation Management Plan for the existing Sonoma Coal mine. The only detail provided is that no void will be left on the proposed mining lease and the post mining land use (PMLU) will be grazing.

EnvA considers that the Progressive Rehabilitation and Closure Plan (PRCP) must be addressed prior to any approval to progress disturbance. We further consider that the proponent be required to reinstate the threatened species habitat that will be disturbed by the Project, and the reinstatement of the vegetation along the existing drain line as a minimum requirement.

The Proponent's response to further information makes it clear that they consider the Project must be considered separately to the Sonoma Coal Mine in relation to rehabilitation requirements but have linked the rehabilitation outcome to the existing PRCP.

Recommendation

That a draft PRCP be developed and made available for public submissions prior to any approval of this Project which details a more appropriate rehabilitation plan that reinstates critical habitat and movement corridors.

Offsets

EnvA is concerned that no offset area has been proposed for the significant residual impacts from this Project. The Proponent has only outlined various nearby stations that could provide for the area estimated 70ha offset area.

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.

Recommendation

That the Proponent is required to prepare a detailed and justified offset management strategy which adequately compensates the loss of threatened species and communities and provides the public an opportunity to make comment on the suitability of any proposed offset area.

Greenhouse gas (GHG) emissions

There is no quantification of GHG emissions in the assessment documentation lodged by the Proponent. The supporting information identifies that the Project will release GHG emissions from fuel consumption, electricity use, and fugitive emission, but not quantification of these other than to indicate that there will be no material change from the current annual emissions rate from the Sanoma Coal Mine. Similarly, there is no acknowledgement that the Scope 3 emissions from the coal produced from this extension of the coal mine will also contribute to GHG emissions.

The Queensland government has recently updated its emission reduction targets and has set a new emissions reduction target of 75% by 2035. To achieve this, there must be no expansion of the fossil fuel industry and a rapid decarbonisation of operating mines. The safeguard mechanism provides one mechanism to achieve emissions reduction, but this only addresses industries producing extremely high annual GHG emissions. To address the need for rapid decarbonisation, the Queensland government prepared the Queensland Resource Industry Development Plan and a draft Greenhouse Gas Emissions Guideline.

The proponent has not provided any detail on how it intends to reduce Scope 1 and 2 emissions other than some very sketchy 'best practice' measures including:

1. Use energy-efficient equipment where appropriate,
2. Maintain equipment, and
3. Use local materials and personnel to reduce transport emissions.

Recommendation

EnvA recommends that the Proponent be required to properly document and quantify the predicted scope 1, 2 and 3 GHG emissions, so that these can be properly assessed given the current policy of the Queensland Government to reduce GHG emissions consistent with the draft Greenhouse Gas Emissions guideline. Further, the Proponent should develop a draft Greenhouse Gas Abatement Plan that provides best practice mitigation measures for GHG emissions including:

- Identification of mechanisms, and committing to taking action, to reduce Scope 1 and 2 emissions including a credible plan to achieve zero emissions by 2050,
- An assessment of the Project's compatibility with the emissions reduction required to meet Queensland and Australia's emissions targets,
- An assessment of the impacts of climate change on all matters of State and National Environmental Significance, and
- A meaningful analysis of the economic, social and environmental cost-benefit of this project to justify the project proceeding given the significant contribution to emissions to accelerating climate change induced weather events.

Social and Economic Impacts

The Proponent falls short in adequately addressing the possible social impacts and lacks evidence that the Project's negative social effects have been avoided or reduced. This inadequacy arises from the Proponents' failure to consider the social costs of exacerbating climate change and its failure to offer strategies to mitigate the Project's climate-related impacts.

This Project will contribute emissions leading to accelerated global climate change. Extreme weather effects are already affecting Central Queensland in the form of increased temperatures, and more extreme and severe heatwaves, bushfires and damaging storms. These climate related impacts risk the health of all people in our region, especially outdoor workers and those who have underlying health issues. All additional emissions from new and expanding fossil fuel developments will impact on the health of Queenslanders, regardless of where the coal is burned.

While the Proponent claims that there will be no material change in Scope 1 and 2 emissions, this Project will extend these annual emissions by at least 5 years, which is an increase in GHG emissions arising from this Project.

In relation to the economic impacts, the Proponent fails to detail the potential costs of not recovering the 'sterilised' coal from ML 10327. Given the International Energy Agency's position that we cannot afford to access any new coal resources if we want to have any chance of staying under 1.5oC global temperature increase, sterilisation of resources is no longer a sound justification.

Further to this, there is no information about the coal to be extracted from ML 10327 and the proposed mining lease. The [QCoal Group website](#) identifies the coal at the Somona Mine as hard coking coal and thermal coal, but does not provide any detail of the relative proportions or economic value of the resource.

The financial, legal, and fiscal risks and costs of climate change are well understood. Further emissions of GHGs into the atmosphere will cause financial, legal, and fiscal risks and costs, which must be set off against any economic benefits of any development that will further contribute to the accretion of GHGs into the atmosphere.

Recommendation

EnvA recommends that the Proponent provide a thorough assessment of the environmental, social and economic costs and benefits associated with this Project.

The [Queensland Government's position](#) is that "Coal projects in Queensland will continue to be supported as long as they stack up economically, environmentally, and socially". Each project must proceed on its own merits, based on demand and economic viability, and meet the highest environmental and community standards. The application for the Project does not provide a reasonable assessment on which to base a decision that the mine 'stacks up'.

Thank you for the opportunity to make a submission on the proposed extension of the Somona Coal Mine.

Yours sincerely,

The image shows two handwritten signatures in blue ink. The signature on the left is 'Coral Rowston' and the signature on the right is 'Claire Gronow'.

Dr Coral Rowston and Dr Claire Gronow

On behalf of:

Environmental Advocacy in Central Queensland