EnvA - CQ
Environmental advocacy in Central Queensland

Department of Environment, Science and Innovation
Business Centre Coal
PO Box 3028
Emerald QLD 4720

Email: CRMining@des.qld.gov.au

1 February 2024

Re: Submission on the proposed amendment to Environmental Authority application (A-EA-AMD-100430427) for the Rolleston Coal Mine Spring Creek North Continuation Project

Thank you for the opportunity to make this submission in response to the application by Rolleston Coal Holdings Pty Ltd (owned by Glencore Operations Australia Pty Ltd) (**the Proponent**) to amend the Environmental Authority (**EPML00370013**) for the Rolleston Coal Mine Spring Creek North Continuation Project (**the Project**) under the *Environmental Protection Act 1994* (Qld) (**the Act**).

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 Rolleston Coal Mine Spring Creek North Continuation Project

The Proponent has applied for an amendment to the Environmental Authority (EPML00370013) for the Rolleston coal mine to extend the operations of the current mining area to the north of the current Spring Creek pit on ML70307 and onto the northern section of ML70415.

The proposed Project is be located approximately 16km west of Rolleston, within the Central Highlands Regional Council area.

The Rolleston Coal Mine is an open cut thermal coal mine which commenced mining in 2005 within ML 70307. Since commencement, the Proponent has been granted four additional ML's to facilitate expanded mining operations and management from the original 4,860ha ML area to 17,470ha. The current approved footprint of disturbance is 9,132ha which accommodates the four operational pits, mining infrastructure and utilities, and an accommodation camp. The current approvals provide for thermal coal extraction at a rate of up to 16 million tonnes per annum (mtpa), however noting that the Proponent believes the production rates will decline from 2025.

The Proponent claims that the production rate or life of mine (LOM) will not change from the approved EA, although it is noted that there will be a 21.6% increase in thermal coal production at the Rolleston Coal Mine if this project is approved.

The Proponent claims that the Project would facilitate increased resource recovery and improved mine closure outcomes within an area that has not previously been approved for mining. It will require an additional footprint area of 606.8ha (Table 2(f)) of the EA supporting information) which the Proponent suggests that is less than 7% of the approved footprint.

EnvA's concerns about this Project and the assessment process

EnvA firmly believes that there is insufficient and inaccurate 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.

Assessment process

The Proponent is progressively expanding the Rolleston Coal mine in steps which the Department of Environment, Science and Innovation (DESI) has determined do not meet the Queensland government guidelines to require an EIS.

EnvA is concerned that DESI has not appropriately applied the required standard criteria outlined in the *Environmental Protection Act 1994* in deciding whether an EIS is required for this coal mine expansion. As further detailed below, EnvA firmly believes that an EIS should be required be required when a project does not meet the standard criteria, particularly in respect to:

- The principles of environmental policy as set out in the Intergovernmental Agreement on the Environment –
    i. The precautionary principle
    ii. Intergenerational equity
    iii. Conservation of biological diversity and ecological integrity
- Commonwealth or State government plans, standards, agreements or requirements about environmental protection or ecologically sustainable development
- The character, resilience and values of the receiving environment
- Best practice environmental management under an environmental authority
- The public interest

EnvA is of the strongest view that this proposal must be either refused, or at least required to do a thorough environmental and social impact assessment.

Terrestrial ecology

The area proposed to be directly cleared for the Project is listed as 592.2ha in section 5.4.1 (Terrestrial Ecology) of the supporting information. It is unclear why this area is not the same as the 606.8 ha footprint area listed in Table 2(f) in the same document.

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, or the further impacts from the increase in climate-change induced severe weather events such as droughts, heatwaves, bushfires and severe and frequent storms.

The Proponent has noted that there are species and vegetation communities of conservation concern which have been recorded from the local area and some identified in field surveys over three survey days in November 2021 and one day in March 2022. These are listed in Tables 19, 20 and 21 in the Supporting Information provided with the Project application.

EnvA considers that the survey effort was insufficient to thoroughly detect threatened flora and fauna within and close to the disturbance footprint. Rather, the Proponent has listed species that are likely or have potential to be impacted by the project. Our comments below relate the precautionary principle that without the detail, we must assume that these species will be impacted by the Project.

Flora

The Proponent has identified that the Project will impact on listed threatened regional vegetation communities:

- 7.0ha of remnant *Eucalyptus populnea* with *Acacia harpophylla* and/or *Casuarina cristata* open forest to woodland on Cainozoic clay plains (RE11.4.7)
- 124.1ha of remnant *Dichanthium sericeum* grassland on Cainozoic igneous rocks (RE11.8.11).

The plant species that may be impacted by the project, based on habitat availability and no thorough survey include:

- *Aristida annua* (124.1ha of suitable habitat)
- *Cyperus clarus* (536.2ha of suitable habitat)
- *Dichanthium queenslandicum* (536.2ha of suitable habitat)
- *Digitaria porrecta* (124.1ha of suitable habitat)
- *Marsdenia brevifolia* (536.2ha of suitable habitat)
- *Trioncinia retroflexa* (124.1ha of suitable habitat)

92.7% of the disturbance footprint was mapped as remnant vegetation. This high percentage of remnant vegetation should be recognised for its importance in maintaining connectivity and ecological value in the Brigalow Belt Bioregion in this region. The region has been extensively cleared for mining and agriculture and cumulative clearing of the remaining remnant vegetation is placing species and ecosystems at high risk.

Fauna

The project will impact on:

- 424.8ha of koala habitat
- 424.8ha of squatter pigeon habitat
- 548.8ha of grey falcon habitat
- 592.2ha of white-throated needletail habitat
- 419.1ha of common death adder habitat
- 146.9ha of yakka skink habitat.

There are records of all of these species within 50kms of the Project, including more than 40 known records of koalas and 30 known records of squatter pigeons in the surrounding area of the Project. This is an indication that these species would likely use the habitat in the Project

area for foraging, shelter or as a corridor. This can only be confirmed with an appropriate field investigation in line with the department's Terrestrial vertebrate fauna survey guidelines[1]

The continued clearing and fragmentation of vegetation in the Bowen Basin has resulted in the decline of the habitat for these species and is one of the leading causes for their current conservation status.

Recommendation

EnvA recommends that the Project be rejected on the basis that the application is clearly unacceptable in respect to the inadequate assessment of terrestrial flora and fauna species which has resulted in deficient information on the direct and cumulative impacts on threatened species and communities that will be impacted by the Project.

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, and
- 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 proponents intention to refer the project (section 5.4.14.3 of the supporting documentation[2]).

Rehabilitation

Given that up to 606.8ha of land will be impacted by the Project, including disturbance of significant areas of important habitat for threatened species and communities, EnvA considers that the rehabilitation plan is inadequate given the impacts on significant environmental values.

The justification for Project is that it would "facilitate improved mine closure outcomes and increase resource recovery."

The Proponent has failed to adequately plan for rehabilitation in the existing Spring Creek mining area, leaving a highwall that cannot be battered down without extending the slope outside of the current approval limit and into the Project footprint. Currently, the final Ramp 1 landform would not support the proposed post-mining land use (PMLU) of grazing, and so would require classification as a Non-Use Management Area (NUMA).

EnvA is concerned that the Proponent is using this expansion to cover up its failure to do genuine rehabilitation and comply with previous approval conditions.

The proponent states that the main rehabilitation objectives of its Rehabilitation Management Plan, are to return the post-mining landscape to:

- A stable, self-sustaining, safe and non-polluting environment,
- An environment/ landscape that is free from liabilities for future stakeholders, and
- The identified post-mining land use within each rehabilitation domain.

The Proponent then goes on to state that "Final voids will form a significant feature of the post mining landform at ROC." The Proponent has indicated that it is not likely that voids will be backfilled as it would not be economically feasible to do so.

The Proponent's water balance modelling indicates that spill events from the voids are unlikely. EnvA is concerned that this modelling is insufficient due to the increased uncertainty of rainfall

[1] https://www.qld.gov.au/environment/plants-animals/biodiversity/vertebrate-survey
[2] https://environment.des.qld.gov.au/__data/assets/pdf_file/0017/313820/a-ea-amd-100430427-supporting-info.pdf

events due to climate change. Another potential impact is the leaching of groundwater through deep drainage from retention dams. The proponent states that it expects adverse impacts to be detected early through the groundwater monitoring program and/or the water infrastructure inspection regime. The Proponent has given no detail on how such impacts would be remedied, should they be detected.

The Proponent notes the need to consider mitigation strategies to reduce or eliminate ponding to minimise the risk of tunnel erosion but has not provided and detail on how this will be achieved. Likewise, the Proponent states that it will consider various land management techniques and review their success and effectiveness as a continual improvement process throughout the life of the mine, but again provides no concrete details.

The proponent is required to submit a Progressive Rehabilitation and Closure Plan (PRCP) to the Department of Environment, Science and Innovation by April 2024. We are concerned that this current application lacks detail to be able to thoroughly assess rehabilitation outcomes.

Recommendation

EnvA recommends that the Proponent is required:

- to prepare a draft PRCP and make this available for public comment prior to any approval of this Project. We further recommend 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.

Offsets

EnvA is concerned that no offset area has been proposed for the significant residual impacts from this Project. The Proponent acknowledges that offsets will be required but has not provided any information on the availability of appropriate habitat, nor any detail on how any offsets might be met. The Proponent only states that "an offset proposal will be developed for all matters identified as likely to experience a significant residual impact" (section 5.4.14.3 of the supporting documentation[3]).

EnvA firmly believes that 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

EnvA recommends 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, and the proposed offset area required is legally secured.

Greenhouse gas (GHG) emissions

The Project's projected greenhouse gas emissions assessment is incomplete and misleading. The Proponent claims that "the Project will not increase the mine's production rate or extend the life of the project," but Table 2-1 of the Projected Greenhouse Gas Assessment notes[4] that the Project will produce approximately 33.7Mt of ROM coal over the life of the Project (an average of 2.4 mtpa) in addition to the current Rolleston Coal Mine production of 156.2Mt of coal over the life of the mine. This 21.6% additional volume of thermal coal and the consequent greenhouse gas emissions is significant.

[3] https://environment.des.qld.gov.au/__data/assets/pdf_file/0017/313820/a-ea-amd-100430427-supporting-info.pdf

[4] SCNCP Projected Greenhouse Gas Assessment, September 2023

The Proponent cites Glencore's initiatives, commitments and target to align with Queensland's emission reduction targets. These total Scope 1,2 and 3 emission reduction targets include a 15% reduction by the end of 2026 and a 50% reduction by the end of 2035 against a 2019 baseline. The Proponent also acknowledges that Glencore is investing in their transition metals portfolio to support the global transition to a low-carbon economy.

However, not only are the Queensland emission reduction targets outdated, the investment into additional thermal coal is also contrary to the company's stated position to support the global ambition to decarbonise. The proponent cites the Queensland Government's and the company's own commitment to "net zero by 2050" and refers to the Net Zero Roadmap prepared by the International Energy Agency, which modelled global energy consumption and demand consistent with that commitment and found that "no new coal mines or mine extensions are needed".[5]

The Project's Scope 1 and 2 emissions

The Proponent estimates that the Project will release over 676,000 t CO_2-e greenhouse emissions over the 14 years of mine operations including fugitive, liquid fuels, and energy 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. The Queensland Resource Industry Development Plan and the draft Greenhouse Gas Emissions Guideline (draft GHG guideline) are also relevant.

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. Continue to investigate means of improving its current low emission intensity operations by maintaining current practices for fossil fuel minimisation,
2. Investigate emerging technologies and further efficiencies such as fuel switching fleet electrification and sourcing renewable energy, and
3. Minimise haul distances and schedule activities to optimise equipment use.

EnvA does not consider these actions demonstrate that the Proponent has a plan to reduce scope 1 and 2 emissions from the Project. The Proponent must be required to provide the decision-maker with a Greenhouse Gas Abatement Plan that outlines the measures that will be taken to avoid, reduce, substitute and, if necessary, offset its direct greenhouse gas emissions. As the draft GHG guideline clarifies, a plan is required that "transparently identifies and reports against the GHG emission reduction measures that will be implemented to achieve emission reductions required by the Commonwealth Safeguard Mechanism and associated baseline."

Scope 3 emissions

The method for Scope 3 emissions calculation in the greenhouse emissions assessment incorrectly cites Table 3 of the NGA factors 2023 as the source of factors for calculating these emissions. It is Table 4 where the conversion figures for burning coal for energy are found. The resulting assessment uses the wrong number from that table in the calculation, resulting in a dramatic under-estimation of Scope 3 emissions from this project.

Bituminous coal has an energy factor of 27GJ/tonne and an emissions factor of 90kg of CO_{2e} per GJ for carbon dioxide and 90.24kg when all greenhouse gases are combined. This is listed in Table 4 as a "Scope 1" value, because it is a direct emission from the burning of coal.[6]

[5] IEA, October 2021. *Net Zero by 2050: A Roadmap for the Global Energy Sector*. 4th revision.
[6] Australian Government. *National Greenhouse Accounts Factors 2023*.
https://www.dcceew.gov.au/sites/default/files/documents/national-greenhouse-account-factors-2023.pdf

Our colleagues with knowledge of GHG estimates, calculate that the actual Scope 3 emissions from this project would be 89,013,097.9 tonnes and annual Scope 3 emissions would be 7Mt. They note that "Glencore's assessment incorrectly applies the Scope 3 emissions factor from Table 4, which is 3kg of CO2e per GJ, despite the National Account Factors providing a formula for proper calculation of this source of emissions. Glencore's Scope 3 emissions for this project are Scope 1 emissions at the consumer end, so calculating the Scope 3 emissions for this project means applying the Scope 1 value from Table 4".

For Scope 3 emissions, the draft guideline on greenhouse gas emissions clarifies that the applicant must:

- outline actions that will be implemented to reduce Scope 3 emissions, such as entering into arrangements with third party suppliers or users; and
- identify the location of emissions (domestic or international) and outline whether they are expected to be subject to similar emission reduction requirements.

The Proponent fails to outline any actions to reduce Scope 3 emissions, but rather relies on the substitution argument, stating "The high-quality thermal coal produced at ROC is suitable for high efficiency power generation. If it is not available, markets may turn to lower quality thermal coal or brown coal which produces higher GHG emissions" without substantiating this claim with any of the necessary information about the destiny of the product coal.

Recommendations

EnvA recommends that the Proponent be required to:

- develop a draft Greenhouse Gas Abatement Plan that provides best practice mitigation measures for GHG emissions which demonstrates that all reasonable and practical measures have been applied to avoid and mitigate emissions through best practice design, process, technology, and management,
- thoroughly assess the Project's compatibility with the emissions reduction required to meet Queensland and Australia's emissions targets,
- provide a comparison of expected project greenhouse emissions with the remaining global, national and state emissions budget, as outlined in the draft GHG guideline, and
- provide 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.

Water

Surface water

The Surface Water Assessment (SWA) is cursory and deficient. It does not provide any predictive modelling or include a considered assessment of the potential impacts of the proposed mine continuation project on surface water quantity and/or quality in waterbodies or natural ecosystems, within or adjacent to the project area.

The Project would result in a potential catchment reduction of 510 ha, or approximately 5% of the Bootes Creek catchment and about 1% of the Meteor Creek catchment, exacerbating the impact on these waterways of already approved mining. The SWA assumes that, since there are no water users in the immediate vicinity of the project, the impacts are expected to be negligible. However, the resulting reduction to the volume of water flowing into these creeks is not described as a proportion of existing flows, or in relation to low flow periods. The potential impacts of reduced flows, including from reduced baseflow, are not assessed in relation to the maintenance of existing aquatic ecosystems.

The Groundwater Assessment (Appendix B) states that a maximum loss of baseflow of 815ML/year will occur in 2030 and that Meteor Creek and Sandy Creek are the highest contributors to this total during and long after the mining period. However, there is no discussion in either assessment about potential ecosystem impacts occurring during periods of very low flow, when baseflow from groundwater can be crucial to stream health. An increased frequency of climate extremes, including droughts and floods, are already evident with climate change and this is expected to increase during the life of the mine. This does not address IESC requirements to consider "the full range of flow conditions," "seasonal variation" and "unusual events."

The SWA notes that no additional flood modelling work was completed to support the surface water assessment. Flood results calculated as per the 0.1% Annual Exceedance Probability were used to assess the effectiveness of engineering solutions already in place but do not take into account an increased frequency and intensity of flooding that are expected with climate change. An assessment of a 0.01% flood AEP is necessary to understand the project's impact in the context of increasingly intense rainfall events.

There is confusion surrounding trigger limits for sodium discharged from the mine into receiving waters (RFI dated 28 August 2023). While the trigger level for mine affected water was shown historically to be in the order of 300,000µg/L, this was not expected to impact receiving waters where ANZ Guidelines for Fresh and Marine Water Quality specify a trigger level of 115,000µg/L. The same document states that, if sodium levels greater than 115,000µg/L are detected by downstream monitoring points, then any releases would cease and an investigation would be conducted. This is not consistent with the statement that "the Project Area drains internally and will be entirely managed by the existing mine water management system and therefore cannot affect downstream water quality."

No explanation is provided to describe how salinity levels from mine affected water will be reduced to 115,000µg/L. It is unclear if this would occur through dilution by discharging during times of high flow or by some other means. Table 4.5 of the SWA states that mine water releases can be made to Bootes Creek and Sandy Creek in accordance with prescribed flow triggers and water quality limits. The SWA refers to "high flow release" and "low flow releases" for Bootes and Meteor Creeks and indicates that monitoring of the receiving environment is undertaken periodically during releases under "natural" flow conditions. The potential impacts of these water releases on aquatic ecosystems is not assessed, especially under low flow conditions.

The SWA does not discuss connectivity between surface water and groundwater except to say that recovery from streamflow to groundwater occurs during infrequent sustained flood events. However, the Groundwater Assessment states that "*with a change in groundwater levels in the alluvium, there is also the potential for an associated reduction in flow from the alluvium to surface water (baseflow). As discussed in Section 3.3.4, the creeks at site have the potential to receive baseflow contributions, particularly during periods of peak rainfall.*"

The reduction in flows to localised creeks and gullies is also mentioned in relation to groundwater drawdown in the Quaternary alluvium along Bootes, Sandy, Spring and Meteor Creeks and groundwater drawdown and depressurisation of the Tertiary basalt (p. 66, Groundwater Assessment). However, the impacts of flow reduction on groundwater-dependent ecosystems are not discussed in either the Groundwater Assessment or the SWA.

Cumulative impacts of the project in combination with the existing mine and surrounding mines is dismissed as being negligible despite the lack of any analysis or evidence to support this conclusion. Cumulative impacts on surface waters are most certainly associated with the existing Rolleston mine that is in the process of diverting two existing streams and the nearby Meteor Downs mine, at a minimum.

Groundwater

The impact of this project on groundwater is extensive and serious and worsens the already severe impacts experienced as a result of permitting mining in an alluvial area very near the confluence of two creeks and adjacent to a conservation area.

EnvA does not consider that it is acceptable for this project to result in seepage from waste rock emplacement to the Bootes Creek alluvium or any of the alluvial aquifers present. The most recent information from the proponent indicates that "Further work is being done to characterise the alluvium" to understand the severity of the impact of this seepage. An EA amendment cannot be approved giving in principle approval for this impact to occur for over 100 years after closure prior to this work being done. The Department should make zero seepage and zero water quality change in the alluvium a condition of this mining operation.

The assessment indicates that some of the waste rock is expected to be potentially acid forming, and several samples showed high metals content, including 40 samples with high selenium. The material acknowledges that "The maximum concentrations are above the ANZECC (2000) stock water guideline levels for aluminium, arsenic, iron, molybdenum and selenium." This material is not suitable for storage above alluvial deposits and no waste rock emplacement should be permitted to seep into such water resources.

Furthermore, this project will worsen water loss, drawdown and reduced baseflow from the alluvium. There are moderate potential groundwater dependent ecosystems "along most creeks and tributaries, as well as lacustrine and palustrine wetlands mapped along Meteor Creek and within the Albinia National Park." There are wetlands of high ecological significance in Albinia Resources Reserve.

This amendment should not be granted given it will worsen the already extensive impact on these alluvial water resources permitted by the existing mine and extension proposals already granted but not taken up.

The assessment states at one point that "No water is predicted to be abstracted from Quaternary alluvium in the SCNCP Pit area," but it is also stated that "The results indicate that for the Proposed model scenario, up to 1,919 ML/year is abstracted from Groundwater Unit 1" which includes the alluvium. It is also stated that "under the proposed model scenario, maximum flux change in the alluvium of 1,541ML per year in 2033." This change is predicted to have extremely slow recovery. The impacts will be experienced for generations.

As discussed above, it is predicted that there will be a reduction in baseflow of 815ML a year in 2030. Despite the assessment claiming to have included consideration of changed climate conditions, this is not evident. The impact of the loss of this secure flow during dry times, when rainfall is not occurring and baseflow more likely to be a high proportion of flow, is not discussed. No information is provided about the role of baseflow in creek flow.

The Groundwater Assessment itemises important wetlands with the potential to support GDEs located on or adjacent to the project including:

- localised sections of Unnamed creeks 1 and 2,
- Spring Creek and its tributaries,
- the upper reaches of Sandy Creek, Bootes Creek, Aldebaran Creek and Meteor Creek, Albinia NP and Mount Hope SF.

The Groundwater Assessment reports that modelling for GDEs was based on long-term quarterly rainfall and did not capture peak recharge or sustained drought periods. Drawdown due to the project is predicted to occur in the above listed GDEs .

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 impacting 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.

Further to this, thermal coal has no benefit to Queenslanders or Australians in our transition to a clean energy future. The Project will have no demonstrated environmental or social benefit and the economic benefit is purely through some royalties which do not stack up in the costs of recovery from the extreme weather events to the public or private economic costs.

The financial, legal, and fiscal risks and costs of climate change are well understood. Additional 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.

We note that the application also appears to make no reference to the engagement of the *Human Rights Act*. It has been established by the Land Court in *Waratah Coal v Youth Verdict* that there is a clear and pressing threat to the right to life that is now experienced by people in Queensland as a results of climate change. This project would make a material contribution to exacerbation of this threat. The draft guidelines on assessment of greenhouse gas emissions clarify that "Several human rights are potentially engaged as a result of greenhouse gas emissions now and into the future. These include the right to life, the cultural rights of Aboriginal peoples and Torres Strait Islander peoples, the rights of children, the right to property and to privacy and home, and the right to enjoy human rights equally." This application should be rejected.

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 Rolleston Coal Mine.

Yours sincerely,

Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland