

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

Submitted via the EPBC portal

28 March 2025

Dear Minister,

RE: Submission on Referral – Callan Coking Coal Bulk Sample Project (EPBC 2025/10122)

Thank you for the opportunity to make this submission in response to the referral of the Callan Coking Coal Bulk Sample Project (**the Project**) by Vitrinite Pty Ltd (**the Proponent**) under the *Environment Protection and Biodiversity Conservation Act 1999 (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.

EnvA believes that opening new and expanding 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, and
- will further degrade wildlife habitats of state and national significance through both habitat loss and climate change.

The Project

The Proponent is proposing to extract a bulk sample of 942kt of coal from a target area within Callan Coking Coal site to:

- Test coal quality and confirm product specifications through CHPP beneficiation and as a screened/unscreened product; and
- Form the basis of a marketing plan to support future Callan Coking Coal products into the market.

The Project Area is 238ha within MDL 454 with a further 4ha external to this mining development lease (**MDL**). The Project is located approximately 20km north of Middelmount and 27km east of Dysart in Central Queensland. It lies between existing Middelmount and Lake Vermont coal mining operations.



ENVA'S SUBMISSION

1. EnvA recommends that the Minister decides that this project will have **clearly unacceptable impacts on protected matters**, most notably the direct impact on threatened species and communities.
2. That the Minister considers the Proponent's suitable operator status with consideration of the multiple compliance infringements of their Queensland Environmental Authorities and the ongoing criminal investigation being undertaken by the Department of Climate Change Energy, the Environment and Water (**DCCEEW**).
3. That the Minister considers this project as a staged project with this 'initial' project potentially leading to a greenfield coal project covering an area of over 2,500ha which if progressed will impact significantly on most matters of national environmental significance (**MNES**).

In the alternative, EnvA recommends that this Project is considered a controlled action due to significant residual impacts on listed threatened species and communities (ss 18 and 18A). We further recommend that the proponent is required to do a more detailed assessment of MNES over the greater project area and provide a more detailed justification of the project.

Further background and detail to our submission is provided below.

GROUNDINGS FOR SUBMISSION

Significant impact on threatened species and communities and migratory species

The project will or has the potential to impact on numerous threatened species and communities listed under the EPBC Act. Along with a desk top survey, the Proponent conducted on comprehensive dry season survey between 27 July and 1 August 2024 and a wet season spotlighting survey in January 2025. A further comprehensive survey is planned for March 2025, the results of which have not been included in the current referral documentation.

From these surveys, the Proponent has identified numerous threatened species, communities and migratory species within 20-40km of this Project which will or maybe impacted on the expansion of this current Project:

Threatened ecological communities

- Brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)
- Poplar Box Grassy Woodland on Alluvial Plains (Endangered)
- Natural Grasslands of the Queensland Central Highlands and northern Fitzroy Basin

Threatened species

- Australian painted-snipe (*Rostratula australis*: endangered)
- Latham's snipe (*Gallinago hardwickii*: vulnerable)
- Squatter pigeon (*Geophaps scripta scripta*: vulnerable)
- Painted honeyeater (*Grantiella picta*: vulnerable)
- White-throated needletail (*Hirundapus caudacutus*: vulnerable)
- Koala (*Phascolarctos cinereus*: endangered)
- King blue grass (*Dichanthium queenslandicum*: endangered)
- Blue grass (*Dichanthium setosum*: vulnerable)
- Grey snake (*Hemiaspis damelii*: endangered)
- Ornamental snake (*Denisonia maculata*: vulnerable)
- Yakka skink (*Egernia rugosa*: vulnerable).

Migratory species

- Fork-tailed swift (*Apus pacificus*)

Of these species, the ornamental snake and the Australian painted-snipe will be directly impacted by the Project. The squatter pigeon, fork-tailed swift and Lathan's Snipe are likely to be impacted by the Project.

EnvA is concerned that this Project is part of a staged project as it is based on an assessment of the coal resources with the stated intention to further develop the Callan Coal mine. This would result in this Project expanding to over 2,500ha which will significantly impact on at least 15 threatened species and communities.

EnvA is of the strongest view that this Project must be refused on the basis of the unacceptable impacts to threatened species in both the direct impacts from the loss of habitat and the cumulative impacts of the continuing approval of new and expanding coal mines that not only destroy habitat forever but also contribute to the impacts of climate change.

Concerns with the Greenhouse Gas (GHG) assessment¹

The Project plans to extract a coal sample of approximately 942 kt of low volatile Pulverised Coal Injection (**PCI**) coal from a small-scale open cut pit. GHG estimates have been based on the extraction and use of this product.

The Proponent estimates the total life of mine (**LOM**) Scope 1 emissions including land clearing are estimated to be 74,736t CO₂-e. The Project will be subject to NGER reporting but will not trigger the Safeguard Mechanism threshold and subsequent GHG emissions reduction obligations.

Scope 3 GHG emissions for the LOM are estimated to be 2,612,427 t CO₂-e, with the major source of emissions being the downstream combustion of product coal (2,602,140 t CO₂-e or 99.6% of the total Scope 3 emissions).

GHG emissions

In general terms, the Project will emit GHGs which cumulatively will increase global temperature and result in adverse impacts to MNES. 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. As global warming increases to 1.5°C and above, these impacts will increase in severity.

Low volume PCI

The proposed coal product is pulverised coal injection (**PCI**). The demand for this low-quality metallurgical coal is rapidly declining² and we have seen other local PCI coal mines being put into care and maintenance due to the fall in prices³.

In the justification for the Project (section 1.1.2), the Proponent notes that "The bulk sample material will undergo comprehensive metallurgical testing to determine its suitability for processing. The results of the testing will provide insights into the recoverability of valuable material from the bulk sample and specifically, how that material may perform as a blend."

We consider that this is an acknowledgement that the coal is of low quality and may only be useful to blend with higher quality metallurgical coal.

¹ Callan Coking Coal Bulk Sampling Project Greenhouse Gas Assessment (Attachment 8 of the referral documents)

² <https://ieefa.org/resources/pci-coal-steelmaking-first-metallurgical-coal-grade-be-impacted-decarbonisation>

³ <https://www.inqld.com.au/business/2023/09/28/bluff-mine-to-close-by-end-of-year-as-prices-fall-and-costs-rise>

EnvA considers that his project will cause significant environmental damage and may not be economically viable. It will only leave a legacy for our communities and our wildlife.

Compatibility of the Project with Queensland legislation and policy

EnvA submits that this Project is contrary to the operational policy for implementing the Qld *Mineral Resources Act 1989*⁴ in relation to two matters:

- Section 4.2 of the GHG assessment¹ indicates the intention to sell the coal from the Project which is contrary to section 3.1 of the operational policy (OP)⁴ which requires the Proponent to provide “A written statement acknowledging there will be no monetary gain from the sale of the sample to facilities owned by the holder, parent company/subsidiaries or any other company”, or to seek the Minister’s consent and to dispose (sell or transport off site) minerals discovered on an MDL (OP - section 4.1). To our knowledge, this consent has not been obtained.
- Bulk sampling activities can only be carried out on an MDL, or in exceptional circumstances an EP (OP – section 2.1). Four hectares of this application are outside MDL 454. We acknowledge that these approvals may be sought outside of this Project from a Queensland perspective, but unfortunately EA applications for bulk sampling projects are generally not released for public comment.

Suitability of the operator

The Proponent has a history of breaching the conditions of State and Commonwealth environmental approvals and is currently under further criminal investigation under the EPBC Act for their operations at the Vulcan North Bulk Sample Project and Vulcan South Coal projects.

EnvA has previously raised our concerns about the Proponent’s compliance history^{5 6 7 8} and suggest that their environmental compliance record is poor with more serious allegations currently under current investigation by the Compliance Branch of DCCEEW.

As such, we are of the firm belief that the Proponent must be considered as not a suitable person as provided for in section 136(4) of the EPBC Act.

Thank you again for the opportunity to make comments on the Callan Coking Coal Bulk Sample Project.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland

⁴ [Operational policy MIN/2020/5192 Applying for bulk sampling on a Mineral Development Licence or Exploration Permit \(February 2025\)](#)

⁵ [Vulcan South – conservation group letter to federal Environment Minister re water resource environmental protection order at the Vulcan Complex Mine – 23 Feb 2024](#)

⁶ [Vulcan North Bulk Sample Project – letter to federal Environment Minister re non-referral of the project for EPBC assessment – 8 Aug 2024](#)

⁷ [Vulcan North Bulk Sample Project – letter to federal Environment Minister re illegal clearing of threatened species habitat – 23 Oct 2024](#)

⁸ [Vulcan South Coal mine – clearing and activity outside approved disturbance area – 24 Feb 2025](#)