

Section 02 General Comments and Responses

2.1. *Asia Pacific Strategy*

2.1.1. EIS General

Comment - 1.A

This assessment is incomplete and fails to address sustainable development requirements of both the Queensland Government's Sustainability Act (2009) (The Act), and its goal of reducing greenhouse gas (GHG) emissions (Section 1.3.1 of the draft South East Queensland Climate Change Management Plan (July 2009)).

The Act requires a holistic consideration of climate change impacts of greenhouse gas emissions associated with the development and operation of mines, transportation of export production to end use power stations and combustion of the coal to produce electricity. This EIS assessment considers only Scope 1 and limited Scope 2 emissions. Scope 2 emissions associated with ocean transportation and Scope 3 emissions associated with end use combustion are also required in order to assure the purposes of The Act will not be compromised by approval of this initial development application.

The International Energy Agency estimates that around 40% of global electricity production comes from coal (around 8,000 TWh of a total 80,000 TWh) and that coal fired power stations contribute around 28% of global CO₂ emissions. Unlike the situation for metallurgical coal exports, Queensland enjoys no comparative advantage over competing seaborne exporters from Indonesia, China, Russia, South Africa and Colombia in the international thermal coal trade.

Recommendation - 1.A

N/A

Response - 1.A

It is assumed that reference is made to the *Sustainable Planning Act 2009*. To this effect, Schedule 4, Table 5, Item 2 of the *Sustainable Planning Regulation 2009* nominates all aspects of development for a mining activity to which an environmental authority (mining activities) under the *Environmental Protection Act 1994* applies, as development that cannot be declared to be development of a particular type in accordance with section 232(2) of the *Sustainable Planning Act 2009*. Accordingly, the provisions of the *Sustainable Planning Act 2009* do not apply to the proposed Kevin's Corner mining activities. The Kevin's Corner EIS included detailed Greenhouse Gas emission data, including inventory and abatement methods within Section 14. In addition, the proposed Kevin's Corner mine is located outside of South East Queensland. The greenhouse gas assessment undertaken for the EIS and SEIS concern the environmental impacts of the activities that are being applied for (and are required as part of the Terms of Reference), which excludes (Scope 3 emissions) the burning of product coal by its end user and sea transport of the coal. The direct emissions from the project (Scope 1) and indirect



emissions from the purchase of electricity (Scope 2) are outlined in Volume 1, Section 14 of the EIS. Emissions from the burning of coal (Scope 3) are not attributed to the project under internationally accepted carbon accounting principles.