

## Asia Pacific Strategy

25 November 2011

The Coordinator-General  
C/- EIS project manager - Kevin's Corner project  
Significant Projects Coordination  
Department of Employment, Economic Development and Innovation  
PO Box 15517  
City East Qld 4002 Australia

Dear Sir/Madam,

This EIS assessment is incomplete and fails to address sustainable development requirements of both the Queensland Government's Sustainable Planning Act (2009) (The Act), and its goal of reducing greenhouse gas 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 20,000 TWh) and that coal fired power stations contribute around 28% of global CO<sub>2</sub> 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.

Given the lack of essential information in this inadequate EIS, I urge the Government's rejection of the Kevin's Corner project on the following grounds:

- The project will cause adverse environmental impacts unless conditions are imposed to avoid, reduce or offset the emissions of greenhouse gases that will result from the mining, transport and use of the coal from the mines;
- The project will prejudice the public right and interest unless conditions are imposed to avoid, reduce or offset the emissions of greenhouse gases that will result from the mining, transport and use of the coal from the mines;
- There are good reasons to refuse to grant mining leases or to impose conditions, namely, to avoid, reduce or offset the emissions of greenhouse gases that the mining, transport and use of the coal from the mines will cause. Such mining lease grants by the Queensland Government are counter to its own sustainable development legislation and climate change management policies;
- The project is not consistent with the principles of ecologically sustainable development due to the contribution that the emissions of greenhouse gases from the mining, transport and use of the coal from the mines will make to global warming;
- The project will not comply with best practice environmental management for coal mining unless conditions are imposed to forbid open cut mining and avoid, reduce or offset the emissions of greenhouse gases that are likely to result from the mining, transport and use of the coal;
- The project will not comply with the general environmental duty unless conditions are imposed to avoid, reduce or offset the emissions of greenhouse gases that will result from the mining, transport and use of the coal from the mine.

Yours sincerely,

R.J.Koerner  
Principal Associate

\* Source: Federal Department of Climate Change