

## Asia Pacific Strategy

16 November 2012

The Coordinator-General  
C/- EIS project manager - Kevin's Corner (Alpha) project  
Coordinated Project Delivery  
PO Box 15517  
City East Qld 4002 Australia

Dear Sir/Madam,

This SEIS assessment is incomplete and inadequate by failing to address strategic sustainable development mandates of both the Queensland Government's Sustainable Planning Act (2009) (the Act), and its goal of reducing greenhouse gas emissions (GHGE). Insufficient information is provided to enable the Government's assessment of the future economic sustainability of the project should a global climate abatement treaty be adopted by India requiring use of carbon capture and storage technology by electricity generators. Future sustainability of the Great Barrier Reef requires eventual adoption of such GHGE abatement agreements on a global basis to enable continued use of conventional coal fired electricity generation technology.

The Act requires a holistic consideration of climate change impacts of GHGE beyond the confines of South East Queensland that are 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 SEIS assessment considers only narrowly defined Scope 1 and limited Scope 2 emissions. Scope 2 emissions associated with ocean transportation and Scope 3 emissions associated with end use combustion in India are also required in order to assure the purposes of the Act will not be compromised by approval of this initial development application.

Given the lack of essential strategic assessments cited above, Asia Pacific Strategy urges 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;

## **Asia Pacific Strategy**

- 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

Cc: Federal Department of Sustainability