



Mackay Conservation Group

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Hon. Meaghan Scanlon
Minister for the Environment
and the Great Barrier Reef
1 William St
Brisbane

Mr Jamie Merrick
Director-General
Department of Environment and Science
400 George St
Brisbane

RE: Request for Requirement of EIS Trigger for Vulcan South Coal Mine

Dear Minister and Director-General,

On behalf of the Mackay Conservation Group, I am writing to you to ask that you:

- require an Environmental Impact Statement for the Vulcan South Coal Mine;
- remove the 2MT/a threshold for requiring an EIS for all coal mines; and,
- confirmation of Vitrinite's requirement to publish an Application Notice detailing the period for public submissions

Under the *Environmental Protection Act 1994, Guideline Criteria for Environmental Impact Statements for Resource Projects, Appendix B - EIS Triggers, For Greenfield mine proposals, 1.*, the Vulcan South Coal Mine does not meet the threshold of 2MT/a to automatically trigger an EIS, with the proposal being at 1.95MT/a.

We hold serious concerns regarding threats to threatened species such as the Greater Glider, Koala, Bridled Nail-tail Wallaby, Fitzroy River Turtle and the Squatter Pigeon amongst others that may be affected by mine. An EIS will determine the level of threat.

The Central Greater Glider recently joined the Koala on the federal Environment Protection Biodiversity Conservation (EPBC) Act Endangered Species List¹ (the Koala having only been up listed in February²). The Central Greater Glider is also listed as Endangered under the Queensland Nature Conservation Act 1992.

Page 498 of Vitrinite's (Vulcan South's proponent) supporting information for their EA application, the Executive Summary of the Terrestrial Ecological Assessment, states that 85.6 ha of Greater Glider habitat is present within the disturbance footprint and 71.1 ha of this Greater Glider habitat will be cleared³. The total area of Greater Glider habitat Vitrinite has identified within the project area is 328.2ha and 617.2 ha within the area surveyed⁴, which includes land outside the project area that could be subject to residual impacts such as light, dust and noise pollution.

Page 91 of Vitrinite's supporting information for EA application states that 'A total of 1,213 ha of Koala habitat is contained within Vulcan South's proposed disturbance footprint, and 1,023.6 ha of this will be cleared.⁵ This is equivalent to over 500 Gabba sized football fields. Most of the project area has been mapped as Koala habitat according to Vitrinite's maps on page 593, fig 5.5 and fig 5.6, listing a breakdown of different habitats to be cleared.⁶

Based on Vitrinite's very limited and preliminary assessments of the land where the Vulcan South coal project is proposed, it is clear the project will result in significant impacts to listed threatened species. These impacts, in our view, should be rigorously assessed through an EIS process. In the absence of an EIS the full extent of environmental impacts will not be assessed and accordingly measures to manage and mitigate impacts will be constrained, to the detriment of threatened Queensland wildlife.

Further to the above, we request you to remove the 2MT/a criterion altogether and that in future all resource projects are subject to the EIS process, such as Magnetic South's Gemini mine⁷.

We also request clarification on whether there will be an opportunity for public comment on Vitrinite's application for an Environmental Authority for the Vulcan South project and whether Vitrinite is required to publish an Application Notice in which the period for public submissions would be detailed.

Thank you for your consideration of these requests.

Yours sincerely,



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¹ https://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=254

² http://www.environment.gov.au/cgi-bin/sprat/public/publicspecies.pl?taxon_id=85104

³ https://environment.des.qld.gov.au/__data/assets/pdf_file/0027/273195/a-ea-new-100265025-part-2.pdf

⁴ ibid

⁵ ibid

⁶ ibid

⁷ <https://www.theguardian.com/australia-news/2022/jun/13/wallabies-coal-and-a-town-called-dingo-the-battle-over-a-queensland-mine-proposal>