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EPBC Submissions  
BMA Alliance Coal Operations Pty Limited  
GPO Box 1389, Brisbane QLD 4001

By email: [CoalCorporateAffairs@bhp.com](mailto:CoalCorporateAffairs@bhp.com) .

28 September 2023

Dear BHP Mitsubishi Alliance,

**Re: Caval Ridge Horse Pit Extension**

Queensland Conservation Council welcomes the opportunity to comment on the Preliminary Documentation for the Caval Ridge Horse Pit Extension. Queensland Conservation Council is the peak body for environmental groups in Queensland and has been supporting communities to protect their environment since 1969. We believe that Queensland can and must be powered by 100% renewable energy by 2030 to achieve a safe climate future.

We have significant concerns about the Horse Pit Extension project. This project has huge climate impacts and is therefore not in the public interest. We call on the Minister to reject this project under the Environmental Protection and Biodiversity Conservation Act on the following grounds:

1. It is not consistent with Australia's commitments under the Paris Climate Agreement and will make it much harder for Australia to meet our existing emissions reduction targets
2. Its significant impacts on groundwater and threatened species in central Queensland have not been adequately minimised or offset

**Inconsistent with Paris Agreement**

The Horse Pit Extension project will produce up to 15 million tonnes per annum (Mtpa) of coal and extend the life of the existing mine for up to 30 years. The International Energy Agency in 2021 was unequivocal: we cannot build new coal if we are to keep warming below 1.5 degrees<sup>1</sup>.

Queensland communities and iconic environments such as the Great Barrier Reef and Wet Tropics World Heritage Area, are already suffering climate impacts. The Great Barrier Reef has

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<sup>1</sup> International Energy Agency (2021) [Net Zero by 2050](#)

suffered four devastating bleaching events in just seven years, including in a La Nina cycle<sup>2</sup>. In 2019, at the end of the last El Nino cycle, bushfire penetrated the Wet Tropics<sup>3</sup>. Thousands of Queenslanders are still rebuilding after destructive floods in 2021 and 2022. The latest Intergovernmental Panel on Climate Change (IPCC) report gathered more evidence about the escalating impacts, particularly to the Great Barrier Reef, likely if we exceed 1.5 degrees of warming. To have a chance of saving the Great Barrier Reef, we need the Queensland Government to reach our international obligations under the Paris Agreement to limit warming to 1.5 degrees.

The project could create nearly 15 million tonnes of downstream emissions per year<sup>4</sup> if approved. That's three quarters of the emissions from the entire Queensland agricultural industry in 2021 (20 Mt CO<sub>2</sub>e)<sup>5</sup>.

### **Increase the task to meet Australia's emissions reduction targets**

The project will also contribute significantly to Queensland's emissions through the release of methane as fugitive emissions during mining. In 2021-22, the Caval Ridge mine produced 264 ktonnes CO<sub>2</sub>e directly in Queensland, equivalent to more than 25,000 households emissions<sup>6</sup>. Of this, at least two thirds is likely to be fugitive methane emissions.

Methane is a much more potent greenhouse gas than carbon dioxide, particularly in the short term. Over 100 years, methane is 28 times more potent than carbon dioxide, but the 82 times more potent over 20 years<sup>7</sup>. Methane cannot be offset by traditional carbon offsetting measures. Methane is chronically underreported from Queensland coal mines, as shown in Ember's 2022 research<sup>8</sup>. These fugitive emissions have a massive impact on the global climate and Queensland's domestic emissions.

Australia's 43% emissions reduction target by 2030 on track to net zero by 2050 is inadequate and not aligned with a 1.5 degree trajectory. Approving this mine will make it even harder for Queensland to meet even these weak targets.

If the Project goes ahead, the total scope 1 and 2 emissions from the Horse Pit extension will average more than 260,000 tonnes of avoidable greenhouse gas emissions, every year until 2050. This means that Australian households and other industries will have to reduce emissions by an additional 260,000 tonnes per year, if the Project goes ahead. This will have a significant economic impact on the Australian economy.

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<sup>2</sup> Climate Council (2022) [No region spared](#).

<sup>3</sup> Guardian (2019) [World Heritage Queensland rainforest burned for 10 days and almost no one noticed](#)

<sup>4</sup> Based on carbon production of 2.4 x coal production

<sup>5</sup> Qld Government (2023) [Emissions and targets](#)

<sup>6</sup> Brisbane City Council (2020) [Reducing Brisbane's emissions](#)

<sup>7</sup> Ember (2022) [Tackling Australia's methane problem](#)

<sup>8</sup> *ibid*

Beyond 2030, the picture becomes even grimmer, as Queensland and the rest of the world attempt to reduce emissions to net zero by 2050. On a linear path from 43% reduction in 2030 to net zero by 2050, Australia will have to reduce emissions by nearly 17,000,000 tonnes per year. The additional emissions from the Project would add 1.5% to our annual emissions reduction challenge between 2030 and 2050. If instead, this mine was not approved and the existing Caval Ridge mine allowed to close in a way that is well managed and planned with the community, the emissions reduction task will reduce by nearly 1.5%.

Given the rapidly accelerating decarbonisation of the steel industry, extending this mine to beyond 2060 would leave Queensland with a stranded asset that is fundamentally inconsistent with the Queensland Government's commitments to both net zero emissions by 2050, and a resilient, responsible and sustainable Queensland resources industry as set out in the Queensland Resources Industry Development Plan (QRIDP).

### **Unacceptable impacts on local water and ecosystems**

The mine would also have significant impacts on local water and ecosystems.

The Project proposes to release mine-affected water into Cherwell Creek. During significant rainfall events, uncontrolled spills of mine-affected water may also occur into Horse, Caval, and Nine Mile creeks. These releases will change water quality in the receiving environment which may impact on environmentally significant aquatic species such as the white-throated snapping turtle and the Fitzroy River turtle. The Isaac River alluvium stygofauna are also likely to be impacted. The Project lies within the Fitzroy River Basin - the largest catchment of water entering the Great Barrier Reef World Heritage Area. The cumulative impacts of mine-affected water from the growing area of coal mines on water quality entering the Reef must be considered.

The Bowen Basin is a highly fragmented and cleared landscape, as is much of Australia. In the last two years, this fragmentation has led to the koala and greater glider being reclassified from vulnerable to endangered, due to the impacts on climate change and the consequent severe weather and fire events, as well as direct clearing. In the Bowen Basin, the destruction is stark. 78.7% of vegetation has already been cleared in the Isaac-Comet Downs Brigalow Belt subregion (Accad *et al.* 2021). Significant populations of koalas and greater gliders have been recorded in previous surveys in the Project area, but they were not recorded in the recent surveys. It seems that they have become locally extinct due to the expansion of coal mines in the Moranbah area.

This Project will result in the disturbance of 911 ha, including loss of nearly 170 ha habitat of the endangered ornamental snake

Further clearing and disturbance is already occurring at the Olive Downs Coking Coal Project and the Vulcan Coal Complex Project, with the proposed Saraji East Project and the Winchester South Projects under assessment at present. The Caval Ridge project should assess cumulative impacts on threatened species. A more thorough assessment of the cumulative impacts is required before even more of our Queensland ecosystems and species are added to the endangered list, or worse, they make the extinct list.

### Offsets

Of particular concern are the offsets proposed to deal with the significant residual impacts on these species. The proposed offset strategy appears to use 'averted loss' offsets, where areas of existing habitat are preserved to compensate for the destruction of habitat elsewhere. No ornamental snakes were found in the offset areas, for example, while two were seen in the mine area. These offsets do not effectively provide quality habitat for threatened ecosystems and species, and do not offset the significant impacts described above.

### Final landform

The Project proposes to leave a final mine void of approximately 545 hectares, representing over half of the proposed disturbance area. Given the mine will impact on large areas of threatened species habitat, I consider that this level of rehabilitation is unacceptable. The Preliminary Documentation also suggests that there will be a significant increase in water salinity in this huge mine void which is likely to lead to the water in the void being unsuitable for livestock or agriculture. This does not meet best practice or even leading practice in mine rehabilitation.

Based on the above concerns about global climate change, the ability of Queensland to meet our emissions reduction targets and impacts on Queensland water, flora and fauna, the Project should not be approved. Please get in touch with Energy Strategist Clare Silcock on [clare.silcock@qldconservation.org.au](mailto:clare.silcock@qldconservation.org.au) to discuss this submission.

Yours sincerely,





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