

Comment on the draft terms of reference (TOR)—Galilee Basin Power Station

Comments close at 5pm on Friday 22 February 2013

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Section of TOR	Describe the issue	Suggested solution
3.1	The environmental record needs to cover all projects undertaken by the proponent and its parent bodies.	Include environmental record of all projects undertaken under the overall umbrella of Mineralogy P/L
3.6.2	'Management' of environmental impacts: In some cases it may well be that the environmental impacts are such that it is not possible to avoid, mitigate, manage or offset them.	Change to read "... impacts may be..."

Send your completed comment form to one of the following:

Email galileebasinpowerstation@coordinatorgeneral.qld.gov.au

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4.1	Discussion of available technologies. The proposed technologies are at the early stages of development and thus are uncertain.	<p>The EIS must discuss in detail the feasibility of proposed technologies, including where such technologies are successfully used, the stage of development and the likelihood and impact of failure to introduce such technologies. As there are currently no commercial scale geosequestration projects operational in Australia, this detailed discussion is essential. The likely risks and impacts associated with geosequestration need to be clearly stated in qualitative and quantitative terms. Here or elsewhere in the EIS the proponents intentions for long-term monitoring (post decommissioning) of the success of otherwise of the sequestration of carbon dioxide must be discussed. This section must also discuss the finance for such monitoring.</p>
5.1	The proposal would both contribute to and be affected by climate change.	<p>The contribution to climate change (including the coincidental contributions effected by the proposal) must be discussed in detail in qualitative and quantitative terms.</p>
7.2	The full extent of economic impacts need to be considered.	<p>Analysis of economic impacts must includes monetary and non-monetary impacts, including but not limited to non-tangible, residual and non-user costs and benefits, including of externalities associated with the development and all direct, indirect and cumulative costs and benefits), and an assessment of the distribution of costs and benefits. Given the nature of this particular proposal, the analysis should extend to costs and benefits of consequential developments. For example, if power supply to the Queensland power-grid, and energy support for industrial developments in the Northern Economic Triangle (NET) is seen as a benefit, then the impact of carbon emissions arising from the project and its associated infrastructure would need to be seen as a cost.</p> <p>The EIS must not rely on input-output analysis to demonstrate or justify the impacts of the proposal.</p>

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9.	Cumulative impact assessments were designed to capture all developments that would contribute to the phenomenon of 'death by a thousand cuts'; referring only to some of the major ones does not cover the problem.	Require all cumulative impacts to at least allude to all known and/or anticipated developments in the region. Cumulative impacts must include successive, incremental and combined impacts (both positive and negative) and the interactions within and between all impacts. Cumulative impact assessment is NOT merely the simple addition of some impacts of some development on some aggregated values.
10	Sustainable development – life-of-project	Given that the proposal relies on long-term geosequestration, of waste, the life of project must be seen to include the permanent capture of carbon, and the discussion and assessment of sustainability must endure beyond the closure of the plant and rehabilitation of the site.

If there is insufficient space in the table above, please attach additional pages.