

Hon Tanya Plibersek MP  
Minister for the Environment and Water  
c/- Department of Climate Change, Energy, the Environment and Water

8 March 2024

Dear Minister,

**RE: Comment on Referral: Blackwater Mine – Northern Extension Project (EPBC 2023/09723)**

Thank you for the opportunity to make this submission in response to the referral of the Blackwater Mine – Northern Extension (**the Project**) proposed by BM Alliance Coal Operations Pty Ltd. (**the Proponent**) under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

**Environmental Advocacy in Central Queensland**

Environmental Advocacy in Central Queensland (**EnvA**) is a Central Queensland association concerned about the risks associated with coal mining, coal seam gas and climate change.

EnvA believes that opening new and expanding coal and gas projects:

- is contrary to meeting Australia's emission targets and Queensland's emission targets,
- is likely to result in irreparable damage to our local landscape and result in stranded assets,
- will put our local community at further risk of extreme weather such as increasing the intensity and frequency of storms, floods, droughts and bushfires,
- will damage our significant coastal resources including our beaches and the Great Barrier Reef through storm surge and increased coral bleaching events,
- will further degrade wildlife habitats of state and national significance through both habitat loss and climate change, and
- rarely take into consideration the views of Traditional Owners and local communities who are concerned about protecting their land from fossil fuel development.

**The proposed action**

The Blackwater Mine (BWM) is located approximately 20 kilometres (km) south-west of Blackwater in the Bowen Basin, Queensland.

The Proponent is seeking approvals to extend the current mining operation for the Project, which would extend the mining area of the existing BWM on ML1759 and ML1762. The Project area is approximately 9,048ha with approximately 3,761ha proposed to be impacted by the Project's disturbance.

The proposed Project would extend the life of the mine from 2029 until 2085, increase production from 16 Mtpa to up to 17.6Mtpa (product coal) and result in the extraction of an additional 220 million tonnes of coal.



The Proponent acknowledges that this mine expansion may change the magnitude of impacts to matters of national environmental significance (**MNES**) and identifies the MNES which will be significantly impacted as:

- (a) Listed threatened species and communities (ss 18 and 18A), and
- (b) Listed migratory species (ss 20 and 20A).

## **ENVA'S SUBMISSION**

1. EnvA recommends that the Minister decides that this project will have **clearly unacceptable impacts on protected matters**, most notably the direct impact on threatened species and communities, migratory species, and the significantly increased greenhouse gas emissions resulting from increasing production rates and extending the life of the mine.
2. In the alternative, EnvA recommends that this is considered a controlled action due to significant residual impacts on:
  - (a) Listed threatened species and communities (ss 18 and 18A),
  - (b) Listed migratory species (ss 20 and 20A), and
  - (c) Water resources (ss 24D and 24E).

We further recommend that this be assessed through a bilateral assessment environmental impact statement (EIS) process. The Queensland Department of Environment, Science and Innovation have informed us that they will be requiring an EIS process for this proposal and hence it seems sensible for this assessment to be assessed under the bilateral agreement.

3. Consideration should be given to including further controlled actions due to the impacts of significantly increased greenhouse gas emissions on MNES:
  - (a) World Heritage (ss 12 and 15A);
  - (b) National Heritage (ss 15B and 15C);
  - (c) Ramsar Wetlands (ss 16 and 17B);
  - (d) Commonwealth marine areas (ss 23 and 24A); and
  - (e) Great Barrier Reef Marine Park (ss 24B and 24C).

Further recommendations are provided in our grounds for submission below.

## **GROUND'S FOR SUBMISSION**

### **Significant impact on threatened species and communities**

As identified by the Proponent, this Project will have significant residual impacts on threatened species and communities including direct impacts on:

- 36.2 ha of squatter pigeon habitat,
- 26.9ha of koala habitat
- 94.3ha of Australian painted snipe habitat, and
- 85.7ha of ornamental snake habitat.

Additionally, the proponent has recognised that there will also be indirect impacts to the species list above, the white-throated needletail and 6.3ha of brigalow.

EnvA appreciates that the Proponent considers that the Project should be considered as a controlled action on the grounds of significant residual impacts on threatened species and communities, but only identifies the ornamental snake as significant impact.

We believe that the direct and indirect impacts on all the identified threatened species must be considered as significant in a region which has already been subject to significant habitat clearing and fragmentation.

### **Significant impact on migratory species**

As identified by the Proponent, this Project will have direct and indirect impacts on the:

- Fork-tailed swift (*Apus pacificus*)
- Latham's snipe (*Gallinago hardwickii*)
- Glossy ibis (*Plegadis falcinellus*)

The proponent does not consider these to be significant impacts. EnvA contends that cumulative loss of feeding habitat for these migratory species must be considered as a controlled action.

### **Significant Impact on Water Resources**

The Proponent has determined that the Project will not result in impacts on surface or groundwater.

EnvA is concerned that there has been insufficient evidence provided to confirm this assertion. The monitoring, mitigation and management information proposed in the groundwater and surface water reports on the premise that the project is likely to have few impacts on water resources.

It is apparent that significant hydrological impacts have been ruled out prior to modelling and an uncertainty analysis being completed. The application documents state that surface and groundwater assessments are currently being prepared in accordance with the EPBC Significant Impact Guidelines and the IESC guidelines and will be "available on request." This makes it very hard for us to fully understand the potential impacts on ground and surface water and how the proponent can argue its project will have no significant impact on water resources prior to these assessments being undertaken.

The application documents also state that preliminary groundwater impact assessment showed "substantial drawdown" in the Rangal Coal Measures both "incrementally and cumulatively". This indicates that there are likely to be significant impacts to groundwater dependent ecosystems (GDE) and riparian and aquatic ecosystems. These impacts have not been assessed.

EnvA believes that the potential impacts to surface water resources through:

- direct disturbance associated with open cut mining,
- diversion of drainage features,
- creation of new temporary and permanent landforms that affect flood waters, and
- through release of water to the surrounding environment do need thorough assessment.

The Project also has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent aquifers due to changes in hydraulic gradients. Potential impacts to groundwater resources may include:

- potential drawdown of groundwater aquifers,
- alteration of groundwater flow directions and decrease in baseflow to surface water systems;
- localised effects on groundwater quality; and
- long-term changes to groundwater levels and flow direction in the vicinity of final voids.

EnvA recommends that the Minister should adopt the precautionary approach given the lack of information and be satisfied that the Project may have a significant impact on water resources and decide that sections 24D and 24E of the EPBC Act are controlling provisions.

### **Significant impact of Greenhouse Gas (GHG) emissions on MNES**

The proposed Project would extend the life of the mine from 2029 until 2085, increase production from 16 Mtpa to up to 17.6Mtpa (product coal) and result in the extraction of an additional 220 million tonnes of coal.

The GHG emissions, both annually and over the life of the mine from the Project are estimated to be significant over the life of the mine, although there appears to be no assessment of these emissions in the documentation provided.

EnvA contends that the GHG emissions from the Proposed Action constitute an 'impact' as defined by s 527E of the EPBC Act<sup>1</sup>. The Project involves the direct emissions of GHG emissions and the warming effect of those GHG emissions fall into the category of impact in s 527E(1)(a), as they are an event or circumstance that is a direct consequence of the action.

The Project will emit GHGs which cumulatively will increase global temperature and result in adverse impacts to MNES.

Australia, and of particular concern to EnvA, Central Queensland (where this mine is proposed), is already experiencing climate change impacts that include an increased frequency and severity of coral bleaching, storms, heat waves and wildfires, and an increase in the number of endangered species and ecosystems. If warming increases to 1.5°C and above, these impacts will increase in severity.

Therefore, it is our submission that the GHG emissions of this Project, and the warming effect of those GHG emissions, will have a significant impact on the following MNES which need to be included as controlling provisions on the following MNES:

- (a) World Heritage (ss 12 and 15A),
- (b) National Heritage (ss 15B and 15C),
- (c) Ramsar Wetlands (ss 16 and 17B),
- (d) Listed threatened species and communities (ss 18 and 18A),
- (e) Listed migratory species (ss 20 and 20A),
- (f) Commonwealth marine areas (ss 23 and 24A),
- (g) Great Barrier Reef Marine Park (ss 24B and 24C), and
- (h) Water resources (ss 24D and 24E).

Thank you again for the opportunity to make comment on this proposal.

Kind regards



Dr Coral Rowston  
Director  
Environmental Advocacy in Central Queensland Inc.

---

<sup>1</sup> <https://www.dcceew.gov.au/environment/epbc/publications/epbc-act-policy-statement-indirect-consequences-action-section-527e-epbc-act>