

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

21 May 2024

Dear Minister,

**RE: Comment on Referral: Saraji Mine Grevillea Pit Continuation Project (EPBC 2023/09757)**

Thank you for the opportunity to make this submission in response to the referral of the Saraji Mine Grevillea Pit Continuation Project (**the Project**) proposed by BMA 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 proposed Project is an extension to the Saraji Mine - Grevillea Pit coal mining operations. The proposed Project is located approximately 20km north of Dysart in the Bowen Basin within the Issac Regional Council area. The intent is to access available resources located within MDL 700021 immediately east of ML1782 which is currently being mined.

The Saraji Mine has been in operation since 1974, producing approximately 16Mtpa of Run-of-Mine (**ROM**) coal. It is expected that the existing resources within the Grevillea Pit will be exhausted during the 2025 financial year. This Project would extend the footprint of the mine by approximately 220ha and extend the life of the mine until 2055.

If approved, the mine extension would prolong the life of the Saraji mine for another 30 years. There is no information about coal extraction rates over the 30 years or any information on estimated greenhouse gas emissions or any mitigation measures.



The Proponent acknowledges that this mine expansion will impact on matters of national environmental significance (**MNES**) and identifies the MNES which will be impacted as:

- (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).

However, the Proponent considers that these impacts won't be significant. There is no consideration of the cumulative impacts of the expansion of the Saraji mine or the many new and expanding coal mines in the region.

## 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, water resources and the significantly increased greenhouse gas emissions resulting from increasing production rates and extending the life of the mine leading to impacts to MNES.
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).

Due to the impacts on water resources and the significantly increased greenhouse gas emissions on MNES, we further recommend that the following controlling provisions are applied to this Project:

- (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).

3. We further recommend that if this Project is accepted for assessment, that it be assessed through a bilateral environmental impact statement (EIS) process.

Further recommendations are provided in our grounds for submission below.

## GROUND'S FOR SUBMISSION

### Significant impact on threatened species and communities

The project would or has the potential to impact on numerous threatened species and communities listed under the EPBC Act:

- Brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)
- King blue-grass (*Dichanthium queenslandicum*) (Endangered)
- Bluegrass (*Dichanthium setosum*) (Vulnerable)
- Squatter pigeon (southern) (*Geophaps scripta scripta*) (Vulnerable)
- Grey falcon (*Falco hypoleucos*) (Vulnerable)
- Painted honeyeater (*Grantiella picta*) (Vulnerable)
- Star finch (eastern) (*Neochmia ruficauda ruficauda*) (Endangered)

- Australian painted snipe (*Rostratula australis*) (Endangered)
- Ornamental snake (*Denisonia maculata*) (Vulnerable)
- Yakka skink (*Egernia rugosa*) (Vulnerable)
- Koala (*Phascolarctos cinereus*) (Endangered)
- Greater glider (*Petauroides volans*) (Endangered)
- Ghost bat (*Macroderma gigas*) (Vulnerable)
- Corben's long-eared bat (*Nyctophilus corbeni*) (Vulnerable)

The assessment of the impact on these species communities is not detailed in the information provided and has only been compiled using a combination of desktop information and information extrapolated from recent field surveys.

EnvA considers that the impacts on listed species and communities requires more detailed surveys to fully identify the direct, indirect, habitat fragmentation and cumulative impacts that are likely to occur. Hence, we consider that all of the above listed threatened species and communities should be listed as controlling provisions.

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

Seven listed migratory species were identified as potentially occurring in the Project area:

- Fork-tailed swift
- Shar-tailed sandpiper
- Pectoral sandpiper
- Oriental cuckoo
- Latham's snipe
- Satin flycatcher
- Rufous fantail

We appreciate that the Proponent has identified that this project will impact on the habitat of these migratory species. Further information on the direct, indirect, habitat fragmentation and cumulative impacts on the above listed migratory species is required to provide more informed comment. With the lack of information provided in the application, EnvA considers that the impacts to these species should be properly assessed, and migratory species identified as a controlling provision.

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

The referral does not provide a detailed assessment of the impacts on water resources.

#### **Surface water**

The Proponent has identified the potential to impact surface water resources through the diversion of drainage features, creation of new temporary and permanent landforms with potential to affect flood waters and through release of water to the surrounding environment.

Specifically, the Proponent has identified "potential" impacts to:

- The Phillips Creek alluvium, which the Project will reduce the drainage systems and potentially alter creek geomorphology and flow characteristics, and
- Impact on the surface water yield of 221ha of the catchment areas of One Mile, Southern, Phillips and Boomerang creeks and the Isaac River.

The Proponent also claims that surface water quality impacts will be limited as mine affected waters will be contained within the existing water management system. However, the Proponent also notes that the existing water management system may spill in extreme rainfall events.

As the climate change induced severe weather events become more frequent, EnvA considers that these heavy rainfall events are likely to become more frequent and mine water releases into the Great Barrier Reef catchment will also become more frequent.

EnvA recommends that the Minister should be satisfied that the Project is likely to have a significant impact on water resources and include the further controlling provisions:

- (a) World Heritage (ss 12 and 15A),
- (b) National Heritage (ss 15B and 15C),
- (c) Commonwealth marine areas (ss 23 and 24A), and
- (d) Great Barrier Reef Marine Park (ss 24B and 24C).

These controlling provision were recently applied to the Blackwater Mine – North Extension Project<sup>1</sup> and should also be applied in this case.

### Groundwater

The Proponent notes that the Project has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent hydrostratigraphic units due to changes in hydraulic gradients.

Potential impacts to groundwater resources may include:

- Reduction in groundwaters and availability for use including ecological, stock watering, and mine water extraction.
- Long term impacts associated with ongoing final void pit water evaporation.
- Blending and water deterioration due to evaporation from final proposed action void.

The Proponent argues that the current groundwater is currently has high salinity levels and any additional impacts from dewatering and the final void will be negligible, but there is no modelling provided to support the assertion than impacts will be insignificant.

EnvA considers that the information provided is insufficient to determine that the impacts on water resources will not be significant and the Minister should determine that the project is a controlled action in relation to water resources (ss 24D and 24E).

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

The proposed Project would extend the life of the mine from 2025 until 2055 which will result in a further 30 years of additional greenhouse gas emissions.

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

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.

---

<sup>1</sup> [Blackwater Mine – North Extension Project \(2023/09723\)](#)

It is also unclear on how the additional emissions will be mitigated or reduced to meet Australia's and Queensland's emission reduction targets or align with requirements under the Safeguard Mechanism.

### **Project justification**

There is no convincing justification for this project.

Rapid reductions in CO<sup>2</sup>-e emissions from the coal and steel industry are critical to meeting the Paris agreement targets. For example, the International Energy Agency notes that CO<sup>2</sup>-e emissions from steel must reduce by 1.8GtCO<sub>2</sub> by 2030 and 0.2GtCO<sub>2</sub> by 2050<sup>2</sup>. As carbon capture and storage technology fails to deliver<sup>3</sup>, these reduction targets can only be achieved by switching from coal to renewable energy sources.

The Proponent details the economic benefits of employment, export earnings, government revenue, and using the resource opportunity available, but it does not address the costs of the environmental and social impacts. The recovery from climate-related weather events is becoming more-and-more costly to government and the community. In addition, the impacts on our iconic wildlife (like the koala) and special places (like the Reef) will impact on tourism revenue hence a significant component of our regional economy.

We understand that the Proponent is a major 'player' in the fossil fuel industry, but this should not exempt them from environmental and social scrutiny of proposed projects that will impact on environmental and social values.

EnvA considers that this is a clearly unacceptable Project at a time when the world is needing and wanting to transition to a clean energy future, there are sufficient coal resources already approved to supply the domestic and international demand, and the desperate need to reduce emissions and slow the impacts of climate change.

We are also disappointed in the level of information provided on the potential impacts and the interrelationship with other proposed developments (i.e. Saraji East EPBC 2016/7791). We further consider that project be considered as a staged or split development under section 74A of the EPBC Act <sup>4</sup>, and consider that this project should be rejected, or alternatively, considered to be a controlled action where the community is provided with detailed information in respect to the environmental impacts of the proposed Project.

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

Yours sincerely,



**Dr Coral Rowston**

Director

Environmental Advocacy in Central Queensland

---

<sup>2</sup> [NetZeroBy2050-A Roadmap for the Global Energy Sector](#)

<sup>3</sup> [Net Zero Roadmap: A global pathway to keep the 1.5°C goal in reach](#)

<sup>4</sup> [EPBC - Staged and split development policy](#)