

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

5 July 2024

Dear Minister,

RE: Submission on Referral - Coppabella Mine Humbug Gully Project (EPBC 2024/09867)

Thank you for the opportunity to make this submission in response to the referral of the Coppabella Mine Humbug Gully Project (**the Project**) by Peabody Energy Australia PCI (C&M Management) Pty Ltd (**the Proponent**) under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**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 of the ongoing existing Coppabella Mine requiring the diversion of the Humbug Gully (HG diversion).

The HG Diversion is proposed upstream of the mining area and will divert flow south to Harrybrandt Creek via the previously authorised North Arm to South Arm Diversions.

The Project will cover 546.62 ha including a direct disturbance area of 246.5 ha.

The Proponent acknowledges that this Project will have direct impacts to terrestrial and aquatic ecology values, water resources (surface and groundwater), air quality, and to sensitive receptors (resulting from air, noise and vibration). The Proponent also acknowledges that there may be indirect downstream impacts resulting from the change in flow conditions in Humbug Gully downstream.



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 water resources.
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 as the current documentation is not considered comprehensive enough to determine likely impacts of the project.

Further recommendations are provided in our grounds for submission below.

GROUND'S FOR SUBMISSION

Significant impact on threatened species and communities and migratory species

The project would or has the potential to impact on numerous threatened species and communities listed under the EPBC Act. Of note, the Proponent has identified direct impacts on:

- 11ha of brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)
- 220ha of koala habitat (*Phascolarctos cinereus*) (Endangered)
- 220ha of greater glider habitat (*Petauroides volans*) (Endangered)
- 218ha of squatter pigeon habitat (*Geophaps scripta scripta*) (Vulnerable)
- 29.5ha of ornamental snake (*Denisonia maculate*) (Vulnerable)
- 249ha of fork-tailed swift habitat (*Apus pacificus*) (Migratory)

EnvA notes that these are species are regularly identified in applications for new and expanding coal mines. We have seen the conservation status of koalas and greater gliders decline in the last few years. Adequate assessment of listed species and communities to fully identify the direct, indirect, habitat fragmentation and cumulative impacts on these species is essential.

Significant Impact on Water Resources

Surface water

The Proponent has identified the need to divert the Humbug Gully requiring the excavation of a new channel which will impact on surface water directly, both through re-diversion of natural water flows and through significant excavation works within waterways.

As identified in the application for the project, the Project is likely to impact on groundwater. The Proponent intends to engage a third party to complete a surface water modelling and impact assessment to meet the requirements of the EPBC Act and the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development. It is anticipated the Groundwater Modelling and Impact Assessment for the Action will be available in 2025.

In addition, Humbug Gully and Harrybrandt Creeks have a high potential for terrestrial groundwater dependent ecosystems (GDEs). Tributaries associated with Isaac River are likely groundwater dependent due to surface flow only occurring after times of high rainfall, the depth of the water table potentially being in reach of tap root systems, and clay soils that hold water for extending periods supporting adjacent wetland areas. Disturbance to the connectivity of the local waterways may have impacts on GDE's in a much broader area than the project footprint, and hence also impact on threatened species including koalas and greater gliders.

Given that the information on potential impacts to groundwater and GDEs is not currently available, EnvA considers it essential that impacts on water resources be considered as a controlling provision.

These works are proposed to occur in the largest catchment flowing to the Great Barrier Reef. As such, 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 Project¹ and should also be applied in this case.

Significant impact of Greenhouse Gas (GHG) emissions on MNES

The proposed Project would extend the life of the mine from until 2042 which will result in a further 18 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.

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.

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

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.

The proposed coal product is pulverised coal injection (**PCI**) coal. The demand for this low-quality metallurgical coal is rapidly declining² and we have seen other local PCI coal mines being put into care and maintenance due to the fall in prices³.

This project will cause significant environmental damage and may not be economical viable, which leaves a legacy for our communities and our wildlife. We trust that you will determine this to be an unacceptable Project.

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

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland

² <https://ieefa.org/resources/pci-coal-steelmaking-first-metallurgical-coal-grade-be-impacted-decarbonisation>

³ <https://www.inqld.com.au/business/2023/09/28/bluff-mine-to-close-by-end-of-year-as-prices-fall-and-costs-rise>