

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

15 October 2024

Dear Minister,

**RE: Submission on Referral - Peak Downs Mine Power Line Realignment Project (EPBC 2024/09983)**

Thank you for the opportunity to make this submission in response to the referral of the Peak Downs Mine Power Line Realignment Project (**the Project**) by BM Alliance Coal Operations 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 is concerned about the significant impacts on the environment stemming from the high numbers of new and expanding coal and coal seam gas projects in Central Queensland, particularly the impacts on threatened species, water quality and the resulting greenhouse gas emissions.

### **The proposed action**

The Project seeks to realign three powerlines (7N/5N/2N) to facilitate the continuation of approved mining activities at the Peak Downs Mine (PDM). The existing mine pits are progressing to the east and are approaching the exclusion limits to blasting for mining activities. The Project would realign the powerlines to the east of the current alignment, and would comprise the following three components:

- 7N power line realignment – entirely outside of a mining lease
- 5N power line realignment – partly within ML 70411, partly outside a mining lease
- 2N power line realignment – entirely within ML 70411

The proposed disturbance footprint covers a 12.66 km powerline realignment corridor encompassing approximately 83.39 ha of land.

### **ENVA'S Recommendation**

EnvA recommends that the Minister decides that this Project is considered a controlled action due to likely significant residual impacts on listed threatened species and communities (ss 18 and 18A). We further recommend that the Project be assessed through a Public Environment Report (**PER**) process as the current documentation is not considered comprehensive enough to determine likely cumulative impacts of the project on threatened species and communities.

Further information is provided in our grounds for submission below.



## GROUNDNS 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:

- 0.4ha of brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)
- 0.57ha of Natural grasslands of the Queensland Central Highlands and northern Fitzroy Basin (Threatened ecological community)
- 17.57ha of koala habitat (*Phascolarctos cinereus*) (Endangered)
- 6.42ha of greater glider habitat (*Petauroides volans*) (Endangered)
- 22.77ha of squatter pigeon habitat (*Geophaps scripta scripta*) (Vulnerable)
- 0.19ha of ornamental snake habitat (*Denisonia maculate*) (Vulnerable)

In addition, the Australian painted snipe is likely to occur in the area, as are several migratory bird species known or likely to occur in, or nearby the Project area as outlined in Table 3-2 within the 7N5N2N Power line Alignment MNES Ecological Report.<sup>1</sup>

EnvA notes that these are species are regularly identified in applications for new and expanding coal mines. The conservation status of some of these species and communities has declined in the last few years. By way of example, koalas and greater gliders were reclassified from Vulnerable to Endangered in 2022. We also note that the Proponent has indicated that this project has the potential for a significant impact on koalas and greater gliders (Tables 9 and 10 in the MNES Significant Impact Assessment Report)<sup>2</sup>.

The pre-clearing cover for the Isaac-Comet Downs subregion is estimated at approximately 2,693,397 ha compared to 570,968 ha that remains (Accad et al. 2023<sup>3</sup>). Therefore, 78.8% of vegetation cover has already been cleared in this Brigalow Belt subregion which means that any further habitat loss or disturbance is likely to result in significant impact on threatened species and ecosystems.

We acknowledge that this Project is comparatively small compared to the large areas already cleared, or proposed to be cleared for coal mining in the Isaac-Comet Downs subregion which include (but not limited to):

- Vulcan Coal, Vulcan Coal infrastructure and Vulcan South
- Peak Downs and Peak Downs Continuation Project
- Saraji, Saraji East, Saraji Grevillea Pit extension, and
- Lake Vermont and Lake Vermont Meadowbrook Extension.

Combined, these projects have already, or if approved, will clear thousands of hectares of threatened ecological communities and species habitat, including the species that have been listed above for this Project. Every hectare of threatened species habitat is now critical to protect to prevent the further decline in conservation status.

EnvA fully believes that the Proponent's claim that there is substantial remnant vegetation present in the survey area (outside the project area) and wider geographical area will remain undisturbed and continue to provide habitat for MNES is flawed.

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<sup>1</sup> [AusEcology \(2024\), Attachment 2: 7N5N2N Power line Alignment MNES Ecological Report prepared for BHP](#)

<sup>2</sup> [Epic Environmental \(2024\), Attachment 1: MNES Significant Impact Assessment Report](#)

<sup>3</sup> Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. (2023). *Remnant Regional Ecosystem Vegetation in Queensland (Version 13.0), Analysis 1997-2021*. Queensland Department of Environment and Science: Brisbane.

By way of example, the proposed adjacent and nearby coal mine developments awaiting an EPBC approval decision currently include:

- Vulcan South Coal Mine (EPBC 2023/09708) – footprint 1,476 ha
- Vulcan Coal Mine – Matilda Pit and infrastructure (EPBC 2022/09361) – footprint 93 ha
- Saraji East (2016/7791) – footprint 3,425 ha
- Saraji Grevillea Pit extension (EPBC 2023/09757) – footprint 220 ha.
- Peak Downs Continuation Project (EPBC 2022/09350) – footprint 4,062 ha.
- Caval Ridge Horse Pit extension (EPBC 2021/9031) – footprint 911 ha
- Lake Vermont Meadowbrook extension (EPBC 2019/8485) – footprint 828 ha

There are also further proposed coal projects proposed in the Bowen Basin which will also impact on threatened species and communities in the broader Central Queensland region.

#### Rationale for our recommendation for a PER assessment

There is a need for an adequate assessment of the direct, indirect, habitat fragmentation and cumulative impacts on the listed species and communities likely to result from this Project given the past and proposed clearing of habitat in this catchment and region.

The mapping provided in the referral documents does not clearly define the location of the Project in the context of the proposed coal mine projects, nor does it depict the areas which are secured and “will remain undisturbed and continue to provide habitat for threatened species”.

EnvA’s recommendation is that this project be assessed at a level higher than preliminary documentation, as there is insufficient information available to make public comment without significant independent investigation to ascertain the Proponent’s assertion. The PER must include a rational assessment of the impacts of the cumulative impacts on the identified threatened species and communities.

Again, EnvA believes that this Project must be considered as a controlled action and further assessment on the cumulative impacts on threatened species and communities provided to enable meaningful community comment.

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

Yours sincerely,



**Dr Coral Rowston**

Director

Environmental Advocacy in Central Queensland