

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

Submitted via the EPBC portal

26 November 2024

Dear Minister,

RE: Submission on Referral – Moorvale South Extension Project (EPBC 2024/09960)

Thank you for the opportunity to make this submission in response to the referral of the Moorvale South Extension 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

Mining activities at the Moorvale South Coal (**MVS**) mine commenced in 2021 and consists of four pits: Y-pit, Z-pit North, Z-pit South and yet to be developed X-pit. This proposed Project comprises mining activities within the extension area of X-pit on mineral development lease (**MDL**) 3034, located directly north of the already approved MVS operations. The Project also includes the backfilling of Z-Pit of the MVS within ML70354.

The Project Area is and is located approximately 15km south of Coppabella and 30km east of Moranbah in Central Queensland. The total Project Area is 999.47 ha, of which the direct disturbance footprint is 716.48 ha.



If approved, the Project is expected to extend the mine's life from 2028 to 2034. The Project will use the existing infrastructure at MVS and the Moorvale Coal mine (MVL).

The Proponent notes that the Project will require vegetation clearing, civil works, establishment of temporary laydowns and access tracks, blasting, haulage (of waste rock, coal and materials) and open cut mining.

The Proponent further notes that these activities will have direct impacts to terrestrial and aquatic ecology values, water resources (surface and groundwater), and to sensitive receptors (resulting from air, noise and vibration). Indirect impacts may result in the form of edge effects to terrestrial and aquatic ecology values.

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 likely significant impacts on water resources and the increased greenhouse gas emissions which will further impact 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 to this, the supporting documentation provided to date incorporates many matters that will need assessment under the Queensland *Environmental Protection Act 1994* (**EP Act**). This process will also provide the community the opportunity to comment on the terms of reference to ensure that all the matters we are concerned about are addressed and an opportunity to comment on the more complete supporting information.

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 will 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:

- 36ha of brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)

- 156ha of koala habitat (*Phascolarctos cinereus*) (Endangered)
- 62ha of greater glider habitat (*Petauroides volans*) (Endangered)
- 157ha of squatter pigeon habitat (*Geophaps scripta scripta*) (Vulnerable)
- 166ha of ornamental snake (*Denisonia maculate*) (Vulnerable)

EnvA notes that these species are regularly identified in applications for new and expanding coal mines in the Bowen Basin in Central Queensland. 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.

We further bring to your attention that the *Koalas not Coal* coalition's most recent report¹ identifies 14 Central Queensland coal projects that are currently under assessment under the EPBC Act. Just these coal mines currently under assessment total over 11,000ha of koala habitat under threat of clearing, but as new projects are referred, this is an underestimate of the ongoing impacts on koala habitat. The same concept applies for the other threatened species identified in most new or expanding fossil fuel proposals in the Bowen Basin.

While we acknowledge that the Minister considers that each project must be assessed on its merit, the cumulative impacts must be considered in the assessment of any individual project. This Project proposes to directly impact on the habitat of at least five threatened species within the 716ha footprint area. This will displace these species with increasingly limited alternative habitat to move into, and most of the individuals will not survive and will never be able to return.

We urge you to consider the ramifications of clearing the houses over multiple suburbs and expecting the people to find somewhere else to move to when there is limited available suitable housing. The same concept must be applied to the impacts of this Project for the threatened species and other wildlife that will be displaced.

EnvA is of the strongest view that this Project must be refused on the basis of the unacceptable impacts to threatened species in both the direct impacts from the loss of habitat and the cumulative impacts of the continuing approval of coal mines that not only destroy habitat forever, but also contribute to the impacts of climate change.

Offsets are often provided, but they cannot ever cater for the habitat requirements of the wildlife species (or people in example of an equivalent area of habitat destroyed) that are displaced and do very little in changing the extinction trajectory of endangered species and communities.

Significant Impact on Water Resources

Surface water

The Project is situated directly west of North Creek. North Creek flows from the north to the south and converges with the Isaac River approximately 3 km south of the Project Area. This confluence feeds into the Mackenzie River, then the Fitzroy River, which outflows to the Coral Sea into the Great Barrier Reef Marine Park. There are three unnamed tributaries within the Project Area.

The Proponent has provided a 'surface water assessment' as a preliminary flood assessment (Attachment F of the supporting information) which is scant in detail or interpretation. EnvA considers that further information is required to determine the impacts of surface water on the overburden dumps and potential coal mine water releases during high rainfall (flood) events into the catchment feeding the Great Barrier Reef.

¹ [Koalas or Coal – How the federal government can help save Australia's most iconic species](#)

Attachment D provides a desktop assessment of Aquatic Ecology which contains some limited detail of site investigations that have been conducted to date. Again, this is limited in detail but notes that there is potential for the following MNES to be present on or near the Project:

- white throated snapping turtle (*Elseya albagula*)
- Fitzroy River turtle (*Rheodytes leukops*),
- Stygofauna
- Terrestrial Groundwater Dependent Ecosystems (GDE) associated with the riparian zones
- A palustrine wetland located on North Creek approximately 1km downstream of the Project Area.

Groundwater

The Proponent has provided a groundwater assessment (Attachment G of the supporting information) which is focussed on the potential impacts on ground water at the completion of MVS mining.

The Proponent has engaged a consultant to complete groundwater 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 (IESC). It is anticipated the Groundwater Modelling and Impact Assessment for the Action will be available in Q1 2025.

As such, there is limited ability to ascertain the significance of the impacts on water resources, we concur with the Proponent that the precautionary principle is invoked and that this Project is assumed to have significant impacts to water resources.

Significant impact of Greenhouse Gas (GHG) emissions on MNES

The proposed Project would extend the life of the mine from 2028 to 2034 which will result in a further six 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. As global 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.

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). 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. Likewise, the demand for thermal coal (a further

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>

product from this Project) is also on the decline. This Project is only proposed to commence in 2028 when the demand for these products is expected to be even lower than it is at the moment. This project will cause significant environmental damage and may not be economically viable. It will only leave a legacy for our communities and our wildlife.

Given the clear and unacceptable environmental impacts of the Moorvale South Extension Project—especially on threatened species, water resources, and impacts arising from greenhouse gas emissions—we strongly urge you to refuse approval for this project. This decision is critical to protecting Central Queensland’s biodiversity, water quality, and a safe climate future.

Thank you again for the opportunity to make comments on the Moorvale South Extension Project.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland