

Department of Environment, Tourism Science and Innovation
Coal Business Centre
PO Box 3028
Emerald QLD 4720

By email: CRMining@des.qld.gov.au

4 December 2024

Attention: Assessment Manager

Re: Submission on the proposed amendment to Environmental Authority application (A-EA-AMD-100633359) for the Dawson Central and North Coal Mine

Thank you for the opportunity to make this submission on the proposed Environmental Authority (EA) amendment for the Dawson Central and North coal mine (**the Project**) operated by Anglo Coal (Dawson) Ltd and Mitsui Moura Investment Pty Ltd's (**the Proponent**).

Environmental Advocacy in Central Queensland (**EnvA**) is a Central Queensland association with an interest in ensuring that all land use is sustainable and does not significantly impact on the environment. We are particularly concerned about the risks associated with coal mining, coal seam gas and climate change.

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

- is likely to result in irreparable damage to our local landscape and many of Central Queensland's threatened species and communities,
- is contrary to meeting Australia and Queensland's emission targets through the production of greenhouse gas emissions, and
- contributes to accelerated climate change impacts on local communities, threatened species and the region's significant coastal resources.

The Project

The Dawson Central and North coal mine (**DCN mine**) is a large-scale open cut metallurgical and thermal coal mine located approximately 180-200km west of Gladstone and between 3-15km northwest of Theodore. The proposed Project is proposed to occur on Mining Leases (ML) 5601, ML5593, ML5599, ML5603, ML5604, ML5611, ML5630, ML5643, ML5644, ML5650, ML5656.

The application is for a change to rehabilitation objectives of environmental authority (EA) EPML00565813 by proposing:

- to retain six mine voids (1650ha) as non-use management areas (**NUMAs**),
- to remove current EA rehabilitation outcomes, and
- an administrative change to adjust the names of rehabilitation outcomes.



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EnvA's concerns about this Project

Lack of clarity on the background and previous approvals

The Proponent provides background in the Project's supporting information¹ to the effect that the original EA for the DCN mine incorporated water storage in residual voids as a final rehabilitation outcome and notes that this pre-2014 EA is provided in Appendix A. However, the early EA was not included, leaving uncertainty that "approved mine voids" were ever approved to be NUMAs.

Despite contacting the Proponent for clarification, the requested document has not been provided at the time of this submission.

EnvA further notes that EPML00565813 has previously been amended on 30 June 2021², 3 August 2023³ and on 3 July 2024⁴. In each of these amended EAs, the rehabilitation requirements detailed in Schedule H require land-based rehabilitation to achieve Post Mining Land Uses (PMLU) including native ecosystems, creation of semi-evergreen vine thicket, creation of hardwood plantation and agriculture. There is no reference to water-filled mine voids or NUMAs.

On this basis, EnvA considers that the Proponent has had many opportunities to raise concerns with their rehabilitation requirements and that mine voids and NUMAs have not received prior approval.

The Project is contrary to the Queensland Government's regulatory requirements for NUMAs

The Queensland Government's regulatory requirements and guidelines⁵ for assessing proposed NUMAs under the EA Act⁶ require that the proponent clearly demonstrate either that:

1. rehabilitating the land would cause a greater risk of environmental harm than not rehabilitating, or
2. (a) the risk of environmental harm as a result of not carrying out rehabilitation of the land is confined to the area of the relevant resource tenure; and
(b) the applicant considers, having regard to each public interest consideration, that it is in the public interest for the land not to be rehabilitated to a stable condition.

EnvA asserts that the Proponent has not adequately met these criteria. Specifically:

1. The Proponent has made no realistic claim that rehabilitating the land would cause greater environmental harm than not rehabilitating the land.
2. (a) The Proponent has not demonstrated that the risk of environmental harm of the proposed NUMA's will be confined to the area of the relevant ML.
 - EnvA further notes that the salinity of the water within the proposed final void NUMAs will increase over time due to evaporative concentration and the predicted Total Dissolved Solids after 100 years are well in excess of the guideline values for livestock drinking water.
 - Weather patterns have significantly changed due to the impacts of climate change, and it is very possible that with the more intense droughts and rainfall events, that:

¹ [Dawson Mine Supporting Information for Environmental Authority Amendment Environmental Authority EPML00565813](#)

² [Revised EA, 30 June 2021](#)

³ [Revised EA, 3 August 2023](#)

⁴ [Revised EA, 3 July 2024](#)

⁵ [Non-Use Management Areas – Information Sheet](#)

⁶ [Queensland Environment Protection Act 1994, Section 126D\(2\)](#)

- The exceedance of predicted maximum void lake water levels may lead to the overflow of contaminated water within the final void NUMAs,
 - The stability of the NUMAs may be impacted over time. The stability assessment methodology used by the Proponent employs a combined geotechnical and groundwater pressure model, which has a reliability score of 46/100 for pit walls completed at least five years ago and 31/100 for all other void walls. Since both scores are below 50/100, the model is categorised as having High Uncertainty,
 - The application does not clearly outline the long-term, management and maintenance of the voids and drain-lines falls, nor does it provide any financial assurances or mechanisms that will ensure long-term management and monitoring of the voids post mine closure.
2. (b) The Proponent has not considered or addressed public interest considerations, but rather have focussed on reducing their costs of rehabilitation.

It is EnvA's strongest view that leaving unrehabilitated land that is unusable, and which has the potential to impact on the environment into the future is not in the best interests of the community or future generations.

The Proponent has not provided any meaningful justification on how this Project is consistent with the legislative requirements associated with PRCPs.

Justification for the proposed NUMAs

The Proponent has not provided a detailed rationale for not backfilling or rehabilitating the mine voids. The justification offered is "The mining method employed, and coal resource extracted at DCN means there is a bulk material balance deficiency across the landform. As a result, there is not enough material to sufficiently backfill the voids created. It also means that the void size cannot be further minimised."

The Proponent has previously prided itself on pursuing best practice mine rehabilitation and delivering outstanding results at the Dawson Mine. The Proponent claims to have been "leading the way in innovative rehabilitation approaches, including completed rehabilitation of an area previously containing voids, to final landform".⁷

EnvA also notes that the Proponent also has also lodged an EA amendment for the Dawson South (A-EA-AMD-100627125) which proposes a further two mine void NUMAs covering an area of up to 169 ha. Combined with the NUMAs provided in the current Project, a total of 1819ha of NUMAs is proposed for the Dawson Coal Mine Complex. EnvA considers this is an example of irreparable damage to our local landscape and many of Central Queensland's threatened species and communities.

It appears that this Project, along with the proposed changes to the Dawson South mine EA, is designed to reduce the costs of rehabilitation requirements ahead of the planned sale of the Dawson Mine to Delta Dunia Group, via its indirect subsidiary BUMA International, via Peabody.⁸ It is unclear to EnvA if there are relevant conditions associated with the Dawson Coal Mine sale, but it appears that rehabilitation obligations form a component of the financial transaction.⁴

EnvA strongly believes that the long-term environmental and social impacts have not been adequately justified and that a longer-term, sustainable rehabilitation is required without a clear justification on why NUMAs are the only option.

⁷ [Mine Rehabilitation Case Study: Dawson Mine](#)

⁸ [Delta Dunia Group, through BUMA International, agrees to acquire a controlling interest in the Dawson Coal Mining Complex, 25 November 2024](#)

Changes to rehabilitation outcomes

The Proponent has proposed amendments to the rehabilitation outcomes which are a significant change to the approved rehabilitation requirements (Appendix B of the EA amendment supporting application¹). Of specific concerns to EnvA:

1. *The inclusion of six final residual voids, which will not only be mine voids, but will also not be rehabilitated into a PMLU, but proposed to be classified as NUMAs.*

As outlined above, there is no apparent information that residual voids or NUMAs have been previously approved. Further to this, the Project is contrary to Queensland Government's legislation and regulations, and no appropriate justification for leaving NUMAs has been provided.

2. *The amendment of creation of native bushland ecosystems to bushland*

The Proponent, in their response for further information⁹, notes that the rehabilitation objective is to rehabilitate to a native ecosystem but argues that this is not based on any particular one or combination of Regional Ecosystems. The Proponent suggests that the preferred objective is to achieve a diverse species mix comprising native vegetation species which are predisposed to establishment and survival on highly modified landforms which supports transit of fauna across of the landscape rather than rehabilitating habitat for the threatened species that have been displaced from the mine development.

It appears that the Proponent's statement that "Except on steep slopes, stock grazing may be used as a managing tool, for example, to manage weeds (especially Buffel Grass) and ground fuel loads" is seeking to replace the creation of native ecosystem bushland to creating agricultural grazing land.

With the removal of significant areas of proposed native bushland rehabilitation to accommodate the proposed NUMAs, and the inferred transition of the rehabilitation to grazing land, EnvA is of the view that if this is approved (which we firmly recommend a refusal), it must be compensated by a revision of offset requirements. Our preference is that the requirements for appropriate rehabilitation to provide native ecosystem habitat for the threatened species that have been displaced from the DCN mine in addition to the security of further offset requirements.

3. *The removal of the creation of semi-evergreen vine thicket as a rehabilitation objective.*

The Proponent has proposed removing the semi-evergreen vine thicket (SEVT) rehabilitation requirement as this previous rehabilitation trials in 2011 and 2013 was unsuccessful, with poor survival, stunted growth, encroachment by Buffel grass, and erosion.

EnvA notes that these trials were over a decade ago, and that similar rehabilitation of SEVT has been successful in other areas in Central Queensland. We also note that there is now conservation advice and guidance available as this threatened ecological community becomes even more threatened.

EnvA believes that this requirement should remain within the EA.

⁹ [Response to request for further information](#)

Conclusion

In light of the above concerns, EnvA submits that the proposed amendment to the Environmental Authority for the Dawson Central and North Coal Mine should be refused. The approval of 1650ha of NUMAs is inconsistent with regulatory requirements, public interest, and best environmental practices. The Proponent has failed to justify the environmental necessity or long-term sustainability of this proposal, and there is insufficient evidence to support the changes in rehabilitation objectives.

We strongly believe that this proposal prioritises financial benefits over the long-term health of our local environment and communities. Should the amendment be approved, EnvA urges the inclusion of more robust and meaningful rehabilitation measures, as well as strengthened offset requirements to protect threatened species and ecosystems.

Thank you once again for the opportunity to submit our comments on the proposed amendment to the Environmental Authority for the Dawson Central and North Coal Mine.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Coral Rowston', is positioned above the printed name.

Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland