



Department of Environment, Tourism Science and Innovation

Business Centre Coal

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24 March 2025

Re: Submission on the proposed amendment to Environmental Authority (EPML00819213) for the Millenium Mine

Thank you for the opportunity to make this submission on the proposed major amendment to Environmental Authority EPML00819213 (**EA**) for the Millenium coal mine (**the Project**) operated by Stanmore Resources Limited (**the Proponent**). The amendment application was originally submitted by MetRes Pty Ltd in June 2024, however the Proponent took full control of the Project in July 2024.

Environmental Advocacy in Central Queensland (**EnvA**) is a regional association committed to promoting sustainable land use practices that minimise environmental harm. We are particularly concerned about:

- the impacts of coal mining and coal seam gas extraction on the environment, the climate and the communities in Central Queensland,
- the legacy impacts of coal and gas in relation to the permanent disruption of ecological process and diminished water quality, and
- stranded assets which are not appropriated removed and rehabilitated either intentionally, or due the financial position of the Proponent.

The Project

The Millenium Coal Mine is a large-scale coal mine consisting of two mining areas with six mining leases (**ML**): the Mavis Downs area (ML 70457, ML 70483 and ML 70485); and the Millennium area (ML 70313, ML 70401, ML 70344). The Project is located approximately 20km south-east of Moranbah in the Bowen Basin.

The application relates to:

- changing the rehabilitation objective for the residual void lake from waterbody (**PMLU**) to a Non-Use Management Area (**NUMA**), and
- additional amendments to streamline compliance requirements for groundwater, air quality and address minor administrative changes within the EA document.



EnvA's concerns about this Project

The proposed EA amendments are inconsistent with legislation, policies and guidelines related to the rehabilitation of coal mines in Queensland. Furthermore, the proposed amended rehabilitation will leave a permanent scar on the local landscape which has the potential to result in long term environmental harm to water quality and does not meet the original rehabilitation outcomes on which the EA was approved.

EnvA has serious concerns about this assessment process and the negative impact on our ability to make meaningful public interest comment.

The Project presented for public comment involved 18 separate documents to review and digest before being able to understand the project. The documents stemmed from separate Proponents with additional response to information requests without the provision of consolidated supporting information or a draft Progressive Rehabilitation and Closure Plans (**PRCP**).

We again reiterate that since 2019, all new EA applications must be accompanied by a PRCP and consider that major EA amendments should also be accompanied by a proposed PRCP for the project, which would be an amended document if an approved plan is in place, or a new plan if the project is caught up in the PRCP transitional provision process.

We have addressed our comments in the two separate components of the application.

Changing the rehabilitation objective to include a NUMA

The Mined Land Rehabilitation Policy¹ and Queensland Government's regulatory requirements and guidelines² for assessing proposed NUMAs under the EA Act³ require that the Proponent clearly demonstrate 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 believes that the Proponent has not adequately met these regulatory requirements. Specifically:

1. The Proponent has not made a reasonable or evidence-based claim that rehabilitating the land would cause greater environmental harm than not rehabilitating the land.
2. (a) The Proponent has not demonstrated that the risks associated with 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 NUMA will increase over time,
 - 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:
 - The exceedance of predicted maximum void lake water levels may lead to the overflow of contaminated water from the final void NUMAs, or

¹ [Mined Land Rehabilitation Policy](#)

² [Non-Use Management Areas – Information Sheet](#)

³ [Queensland Environment Protection Act 1994, Section 126D\(2\)](#)

- The stability of the NUMA may be impacted over time, particularly as the management and maintenance of the voids and drain-lines falls to the landholder following mine closure. The application does not clearly outline the financial assurances or mechanisms that will ensure long-term management and monitoring of the void.
2. (b) The Proponent has not adequately addressed public interest considerations. Instead, their focus appears to be on reducing rehabilitation costs. EnvA strongly asserts that leaving land unrehabilitated, especially when it could pose future environmental risks, is not in the public interest and will not serve the needs of future generations.

The Proponent has not provided any meaningful justification on how this Project is consistent with the legislative requirements associated with rehabilitation nor has it provided any alternatives of retaining the mine voids as a PMLU⁴.

Amendments to EA conditions for groundwater and air quality requirements

Groundwater

Currently, Millennium's EA groundwater contaminant trigger levels has three different approaches:

- a) Three (3) consecutive occasions for values derived from site specific data,
- b) Any single occasion for values derived from ANZG (2018) or other guideline values, and
- c) Two (2) consecutive occasions for values derived from Fitzroy Water Plan WQO values.

The Proponent considers that "these requirements will have the potential of creating compliance notifications and investigations based on a false-positive (exceedance where there is none) which could be related to incorrect sampling technique, a laboratory error, or a genuine outlier in water quality". Hence that the Proponent has requested that the trigger levels be amended to allow for three consecutive exceedances for the three compliance and monitoring approaches.

EnvA's view is that the water quality of the largest catchment draining into the Great Barrier Reef and the dependence of water quality for local agricultural and horticultural pursuits is of utmost importance and must be protected. We therefore oppose the amendment which effectively waters-down the current condition, particularly when the farming sector is facing increasing regulation⁵.

Air quality

EnvA has no significant concerns in relation to the proposed amendments.

Conclusion

In conclusion, EnvA submits the application to label the already approved mine void to a NUMA should be refused. The Project is inconsistent with regulatory requirements, does not serve the public interest, and lacks sufficient justification from the Proponent. There is insufficient evidence to demonstrate that NUMAs are the most appropriate or environmentally responsible option, and the long-term risks to the environment and the Queensland community have not been adequately addressed.

⁴ [Office of the Queensland Mine Rehabilitation Commissioner \(2023\) Identifying a post-mining land use for residual mine voids – Implications for leading practice](#)

⁵ [Queensland Reef Water Quality Program](#)

We firmly believe that the environmental and social outcomes must be considered in the assessment of the Project. This is an obvious cost-avoidance proposal which does not meet any triple bottom line assessment and will result in ongoing environmental and social impacts on current and future generations.

Thank you again for the opportunity to provide comment on the Millenium Coal Mine EA amendment application.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland