

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

Submitted via the EPBC portal

23 May 2025

Dear Minister,

**RE: Submission on Referral – Corvus Coal Project (EPBC 2025/10181)**

Thank you for the opportunity to make this submission in response to the referral of the Corvus Metallurgical Coal Project (**the Project**) proposed by Corvus Resources Pty Ltd. (**the Proponent**) for assessment 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 developing 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.

**ENVA'S SUBMISSION**

EnvA considers this to be the most poorly prepared referral for assessment application that we have ever seen and it is deficient in many aspects. It is unclear why this referral application was made available for public consultation given the serious and significant deficiencies in the application.

We note that the Proponent has submitted an application to the Coordinator-General for declaration of the Action as a 'Coordinated Project' under Part 4 of the *State Development and Public Works Organisation Act 1971* (**SDPWO Act**). If declared a Coordinated Project, an EIS will be prepared under Part 4 of the SDPWO Act<sup>1</sup>.

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<sup>1</sup> [Corvus Metallurgical Coal Project EPBC Referral application](#)



The Coordinated Project application<sup>2</sup> requires:

- an Initial Advice Statement that includes detailed information about the project,
- enough information about the project to allow the Coordinator-General to assess the application in line with the criteria set out in section 27(1)(b)–(f) of the SDPWO Act,
- a separate statement assessing the technical and commercial feasibility of the project, and
- a separate statement detailing the proponent’s financial and technical capability to complete an EIS process for the project and to provide any additional information the Coordinator-General may request.

If it is the case that the Proponent has prepared an application to the Coordinator-General for declaration of the Action as a ‘Coordinated Project’, it is unclear why this more detailed information was not provided as supporting information with this referral application.

### EnvA’s key recommendations

1. EnvA urges the Minister to reject this referral due to the deficient, out-dated and incorrect information contained within the application and/or determine that this project will have **clearly unacceptable impacts on protected matters**.
2. In the alternative, EnvA strongly recommends it be declared a controlled action due to significant residual impacts on:
  - Listed threatened species and communities (ss 18 and 18A),
  - Listed migratory species (ss 20 and 20A), and
  - 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:

- World Heritage (ss 12 and 15A),
  - National Heritage (ss 15B and 15C),
  - Ramsar Wetlands (ss 16 and 17B),
  - Commonwealth marine areas (ss 23 and 24A), and
  - Great Barrier Reef Marine Park (ss 24B and 24C).
3. If the referral is accepted, EnvA recommends that assessment of the Project through a bilateral environmental impact statement (**EIS**) process under the Queensland *Environmental Protection Act 1994 (EP Act)* or the SDPWO Act. An EIS assessment would allow:
    - Public input on the terms of reference
    - Rigorous assessment of species surveys, habitat fragmentation, cumulative impacts, water resources, and climate risks, and
    - Transparency in the evaluation of offsets, mitigation, and alternatives.

Further detail in support of our recommendations is provided below.

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<sup>2</sup> [Application Guideline - Coordinated project declaration under the State Development and Public Works Organisation Act 1971](#)

## **The proposed action**

The proposed Project seeks to develop an underground coal mine approximately 17 km north of Emerald in the Bowen Basin in Central Queensland .

The proposed Project would extract up to 8 Mtpa of run of mine (**ROM**) coal with saleable production of approximately 6.6 Mtpa over a planned mine life of 25 years.

The proposed Project includes the following components and activities within the approximately 5,200ha disturbance footprint:

- underground mining of the Corvus 2 and German Creek Seams within Exploration Permits for Coal (EPC 980 and EPC 1267) using longwall mining,
- mining operations for a period of approximately 25 years,
- development of a pit top area for underground mine entries and associated facilities that support the underground mining activities,
- establishment and use of ventilation and water management infrastructure including shafts, bores, pumps and pipelines,
- management of water that accumulates in the underground workings,
- construction and operation of a new coal processing plant (CPP) that would be established at the existing Gregory Crinum Mine,
- construction and operation of an overland conveyor to transport ROM coal from the underground mining area to the new CPP for processing, and
- construction and operation of an overland conveyor to transport product coal from the CPP to a new train load-out bin on Aurizon's existing Gordonstone Balloon Loop via an overland conveyor.

The other components required for the operation of the Project which have been excluded from the current application include:

- development of infrastructure required to supply the Action with power and/or water (i.e. external electricity transmission lines and water pipelines),
- disposal of coarse and fine rejects within existing open cut mining areas at the Gregory Crinum Mine,
- any other activity associated with the Gregory Crinum Mine under existing environmental approvals, and
- ongoing exploration activities within EPC 980, EPC 1226, EPC 1267 and EPC 2841.

## **GROUND'S FOR SUBMISSION**

### **Significant impact on threatened species and communities and migratory species**

The referral supporting information relied on a desktop assessment to identify any listed threatened species and ecological communities within the Project area, and surveys undertaken during the preparation of an EIS for the Teresa Coal Project in 2011 and 2012 (a proposal which expired in 2016<sup>3</sup>).

The Proponent has noted that EcoSmart Ecology has undertaken one round of comprehensive flora surveys and two rounds of fauna surveys across the Action area, however this remains in preparation and therefore, there is no recent information on which to base our comments.

The Proponent notes that 75% of the Project area has been previously cleared but also identifies that the area contains 1079ha of woodland and 302ha of native grassland. Preliminary mapping has indicated that the following Threatened Ecological Communities (TEC) known to be present:

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<sup>3</sup> [Teresa coal project \(lapsed\)](#)

- Brigalow (*Acacia harpophylla* dominant and co-dominant) TEC (Endangered)
- Natural Grasslands of the Queensland Central Highlands and northern Fitzroy Basin TEC (Endangered)
- Poplar Box Grassy Woodland on Alluvial Plains TEC (Endangered)
- Weeping Myall TEC (Endangered)

Previous records of threatened species in and near the project area include:

- King blue grass (*Dichanthium queenslandicum*) (Endangered)
- Koala (*Phascolarctos cinereus*) (Endangered)
- Greater glider (*Petauroides volans*) (Endangered)
- Squatter pigeon (*Geophaps scripta scripta*) (Vulnerable)
- Australian painted snipe (*Rostratula australis*) (Endangered, Migratory)
- Sharp-tailed sandpiper (*Calidris acuminata*) (Vulnerable, Migratory)
- Ornamental snake (*Denisonia maculate*) (Vulnerable)
- Grey falcon (*Falco hypoleucos*) (Vulnerable)
- Glossy Ibis (*Plegadis falcinellus*) (Migratory)

### **EnvA's comments**

EnvA notes that field survey work and an assessment of the potential impacts has not yet been undertaken with the Proponent indicating that these investigations will form part of the EIS.

However, from the details provided in the Proponents assessment of potential impacts on Matters of National Environmental Significance (**MNES**)<sup>4</sup>, there will be impacts on numerous threatened species and communities and migratory species.

We further note that the same threatened species and communities are regularly identified in coal mine applications in the Bowen Basin. The conservation status of koalas and greater gliders has seen a measurable decline in conservation status over recent years – demonstrating that the current mitigation measures are inadequate.

The cumulative habitat loss across Central Queensland is driving many of these species toward extinction. The 5,200 ha disturbance footprint of this Project will destroy remaining viable habitats, forcing further contraction and fragmentation of already pressured populations.

### **EnvA recommendations**

EnvA is of the strongest view that this Project must be refused based on the unacceptable impacts to threatened species and communities from:

- the direct impacts due to the loss of habitat,
- the indirect impacts detailed by the Proponent above,
- the cumulative impacts of the continuing approval of new and expanding coal mines in the Bowen Basin in Central Queensland, and
- the increasing impacts of extreme weather events on these species and communities.

If the project cannot be refused, we strongly recommend that Listed threatened species and communities (ss 18 and 18A), and Listed migratory species (ss 20 and 20A) are included as controlling provisions and assessed through an EIS process. We consider that the outdated and cursory information provided is not adequate for assessing the level of impact on these MNES.

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<sup>4</sup> [Assessment of potential impacts on matters of national environmental significance – Corvus Metallurgical Coal Project \(Vessi Pty Ltd, 2025\)](#)

## Significant Impact on Water Resources

### Surface water

The Project is located within the Lower Nogoia River/Theresa Creek sub-catchment of the greater Fitzroy Basin. It is within the Theresa Creek and Gordonstone Creek catchments with these creeks feeding into the Nogoia River.

Large areas of the proposed underground mining area appear to overlie the Teresa Creek floodplain (figure 7)<sup>5</sup>.

Again, there is very little information provided with the referral application. The Proponent notes that “A Subsidence Assessment, Surface Water and Flooding Assessment and Geomorphology Assessment will be prepared as part of the EIS for the Action.”

### Groundwater

The Proponent identifies that a groundwater monitoring network was established as part of the Teresa Coal Project in 2012 and has been supplemented with additional groundwater monitoring bores established by Corvus in 2024, but no detail is provided in the referral supporting documentation. The Proponent notes that “A Groundwater Assessment will be prepared as part of the EIS for the Action.”

### ***EnvA comments***

EnvA is of the strongest view that this Project must be refused based on the unacceptable impacts to water resources from:

- direct disturbance for surface infrastructure and the management of captured water within the water management system,
- subsidence of the surface due to underground mining activities, which may alter flow patterns on a local scale,
- changes in baseflow as a result of underground mining activities,
- subsurface fracturing and shearing of sedimentary strata above the proposed longwalls resulting in changes in bulk rock mass permeability and storage capacity, and
- dewatering of groundwater that enters underground mining area.

We consider that the limited and cursory information provided is not adequate for assessing the level of impact on water resources.

### ***EnvA recommendations***

If the Project is accepted for assessment, we concur with the Proponent that the Project is a large-scale coal mining development which is likely to have a significant impact on surface and groundwater<sup>1</sup>, and hence we recommend that Water resources (ss 24D and 24E) should be considered as a controlled action.

## Significant impact of Greenhouse Gas (GHG) emissions on MNES

The proposed Project would extract up to 8 million tonnes per annum (**Mtpa**) of run-of-mine (**ROM**) over a planned mine life of 25 years coal, leading to the additional emissions of greenhouse gases.

The GHG emission estimates are provided in Attachment 4 of the referral application.<sup>5</sup> The estimates indicate that approximately 401 Mt CO<sub>2</sub>-e will be emitted over the life of the mine.

EnvA expected that the Scope 1 fugitive emissions from a large-scale underground coal mining operation to be significantly higher than the estimates provided. Without the provision of the

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<sup>5</sup> [Corvus Metallurgical Coal Project - Greenhouse Gas Emissions Review](#)

GHG Management and Abatement Plan (which is yet to be prepared), it is not possible to ascertain the potential impacts of the Project on threatened species and ecological communities.

### ***EnvA comments***

These GHGs will significantly contribute to increased global temperatures and exacerbate adverse impacts on 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.

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. Approving another green-field coal mine to operate for 25 years is irresponsible and contrary to meeting legislated emission reduction targets and the legally binding international treaty on climate change<sup>6</sup>.

### ***EnvA recommendations***

EnvA contends that the proposed Project will emit GHGs which will contribute to increases global temperatures and result in adverse impacts to:

- (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).
- (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).

### **Concerns about the Proponent's suitability**

We are concerned that the Proponent lacks the technical and financial capacity to deliver and manage a large-scale coal mining operation in compliance with state and federal legislation. This concern is exacerbated by the lack of transparency and factual errors in the referral.

In a search of Corvus Resources Pty Ltd (ACN 621 807 412)<sup>7</sup>, we note that the Proponent has previously been identified as Corvus Coal Assets and Teresa Coal Assets. The current identity has only been registered since February 2024 and appears to have no history of the development of a large-scale greenfield underground coal mine under any of its previous company names.

There was a Corvus Resources Pty Ltd that was proposed to be deregistered by ASIC in November 2012<sup>8</sup>, but it is unclear if this is the same company.

At the time of writing this submission, the Proponent does not appear to have an active website<sup>9</sup> to access any further information, nor they appear to be a publicly listed company with the ASX.

Given the information provided in the application and our cursory investigation into their history, we are not convinced that they have the knowledge, technical experience or finances to operate a large-scale coal project. The quality of their referral application provides further doubt as to their suitability.

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<sup>6</sup> [The Paris Agreement](#)

<sup>7</sup> [Historical details for ABN 53 621 807 412](#)

<sup>8</sup> [Notice of proposed deregistration - ASIC Initiated](#)

<sup>9</sup> [Corvus resources Website](#)

We also note that the project is reliant on the partnership with Sojitz Blue's Gregory Crinum mine, however there is no evidence that such an agreement has been secured and is critical for the development of this project.

In the absence of a demonstrated track record or a verified commercial partnership, it is inappropriate to approve such a high-risk project with significant and likely irreversible environmental consequences.

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Given the clear and unacceptable environmental impacts of the Project—especially on threatened species, water resources, and impacts arising from greenhouse gas emissions—we strongly urge you to refuse approval of 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 proposed Corvus Coal Project.

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