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

19 May 2025

Dear Minister,

RE: Submission on Referral – Isaac Downs Extension Project (EPBC 2025/10183)

Thank you for the opportunity to make this submission in response to the referral of the Isaac Downs Extension Project (**the Project**) proposed by Stanmore ID Extension Pty Ltd., a wholly owned subsidiary of Stanmore Resources 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 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.

ENVA'S SUBMISSION

1. EnvA urges the Minister to determine 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 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).

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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. EnvA supports assessment of the Project through a bilateral environmental impact statement (**EIS**) process. The Proponent has indicated that they will apply to prepare a voluntary EIS under the Queensland *Environmental Protection Act 1994* (**EP Act**) and is supportive of a bilateral assessment process[1]. An EIS assessment would allow:
   - Public input on the terms of reference (**ToR**)
   - 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 to support our recommendation is provided below.

The proposed action

The Project comprises an open cut coal mine pit and associated infrastructure, primarily mining metallurgical coal. Approximately 52 million tonnes (Mt) of run of mine (**ROM**) coal will be mined over 22 years based on 2 – 4 million tonnes per annum (Mtpa).

The Project is located in the Bowen Basin of central Queensland approximately 15 km southeast of Moranbah and 150 km southwest of Mackay and is located immediately south of the currently operating Isaac Downs coal mine (**IDM**). The proposed project area is approximately 2,700ha, with a disturbance footprint of approximately 2,080ha (noting that the areas are not consistent between the application and the supporting documentation).

The infrastructure required for the Project includes a ROM coal pad, ROM coal haul road and site access road (via IDM) with a bridge crossing of the Isaac River, go line and crib area, levees along the Isaac River and Cherwell Creek, diversion of Conrock Gully, mine affected water dam, sediment dams, water transfer pipelines and power line.

GROUNDS 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[2]. Of note, the Proponent has identified direct or potential impacts on:

- 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)
- King blue grass (*Dichanthium queenslandicum*) (Endangered)
- Bluegrass *Dichanthium setosum* (Vulnerable)

[1] Isaac Downs Extension Project – EPBC Referral application

[2] Isaac Downs Extension Project – MNES Ecology Technical Report

- 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)
- Common greenshank (*Tringa nebularia*) (Endangered, Migratory)
- Ornamental snake (*Denisonia maculate*) (Vulnerable)
- Fork-tailed swift (*Apus pacificus*) (Migratory)
- Oriental Cuckoo (*Cuculus optatus*) (Migratory)

EnvA's comments

EnvA notes that field survey work has not yet been completed with further field surveys still to be conducted[2]. However, from the details provided in Section 4.4 and Table 4-1 of the Referral Supporting Documentation [3], there are numerous listed species and communities that will directly be impacted by the proposed Project.

The Proponent also notes that indirect impacts could include:

- Edge effects and fragmentation of habitat may result from the direct clearing of habitat,
- Changes in the abundance of weeds and pests,
- Noise, vibration, dust and lighting impacts from mining activities on vegetation health and/or disruption of fauna movements,
- Hydrology of waterways, which may alter habitat,
- Changes to the quality of water within waterways, which may alter habitat, and
- Changes to hydrogeology (e.g. through the drawdown of aquifers) may result in changes to GDE health and a decline in habitat quality[1].

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 2,080 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 controlling provisions and a full EIS process be required.

[3] Isaac Downs Extension Referral Supporting Information

Significant Impact on Water Resources

Surface water

The Project is located within the Isaac River sub-catchment of the greater Fitzroy Basin. The Isaac River is the main watercourse in the vicinity of the Project area, and flows in a north-west to south-east direction Isaac Downs to the east of the Project.

The Isaac River and other waterways within the Project area are ephemeral and experience flow only after sustained or intense rainfall in the catchment. These ephemeral systems are highly susceptible to disturbance to surface water alterations.

The southern extent of the Project area is bordered by Cherwell Creek which is a major tributary of the Isaac River. Cherwell Creek features a well-defined active flow channel accompanied by a densely vegetated riparian zone, extending approximately 20 m wide along each bank.

A tributary, locally known as Conrock Gully, flows west to east through the centre of the Project area before joining the Isaac River. Under the Water Act, Conrock Gully is not a defined watercourse (it is a defined drainage feature) upstream of Project activities. Conrock Gully flows into the Isaac River approximately 2.5 km upstream of Cherwell Creek. The Project seeks to divert this drainage feature.

Figure 3-7 within the Referral Supporting Documentation[3] identifies significant areas of flood plain with the project area and the disturbance footprint.

There are also isolated, small and fragmented palustrine wetlands along parts of the western bank of the Isaac River, and within low lying areas to the west of the Project area, between Cherwell Creek and Conrock Gully.

Groundwater

The primary aquifers within and surrounding the Project area include the Isaac River alluvium and the Permian coal seams. Locally, the coal seams (Leichhardt and Vermont seams) of the Rangal Coal Measures sub-crop near the surface within the Project area.

The Rangal Coal Measures store groundwater within the two coal seams. The Rangal Coal Measures generally exhibits relatively low permeability and specific yield due to the presence of fine-grained cemented sandstones, siltstones, and mudstones. The coarser sediments of the Isaac River alluvium and paleo-channels are anticipated to have higher permeability and specific yield compared to finer grained sediments and the underlying Rangal Coal Measures.

Groundwater dependent ecosystems

Monitoring bores have been drilled in the Isaac River alluvium at locations identified as potentially supporting groundwater dependent ecosystems (GDEs). Fieldwork has been conducted to confirm the presence of GDEs, involving the collection and analysis of isotope samples from vegetation and groundwater, as well as assessments of moisture content in vegetation and shallow soils. Based on the initial data collected for the Project and information from GDEs at nearby Stanmore owned mines, three terrestrial GDE types have been mapped:

- Riverine (Type 1) GDEs associated with fringing riparian vegetation along the Isaac River and downstream reaches of Cherwell Creek (RE11.3.25).
- Wetland (Type 2) GDEs where seasonal groundwater dependence of deep-rooted wetland vegetation occurs, noting that seasonal groundwater reliance is driven by infiltration of ponded surface waters, and groundwater is rapidly discharged via transpiration as the climate dries.
- Riverine (Type 3) GDEs associated with lower river terraces and flood pockets of the Isaac River.

EnvA's comments

There is limited ability to ascertain the significance of the impacts on water resources, GDEs and aquatic ecosystems from the supporting information provided with the Project. As noted by the Proponent, further monitoring and assessment of the impacts on water resources, GDEs and aquatic ecosystems has yet to be completed[3].

The Proponent has noted that mine affected water will be collected in the pit before transfer to a turkey's nest mine water dam. This mine water can then be used for dust suppression, piped to the Isaac Downs mine if there is excess water or, alternatively, be released in a controlled manner to the Isaac River.

We are concerned that the cumulative impacts of coal mine water released into waterways with the Great Barrier Reef catchment area. In the last wet season, there were multiple and concurrent mine water releases from mines within the Fitzroy Basin[4]. For example, the Isaac Downs Coal mine recently released mine affected water between 5-10 April 2025 at a time coinciding with 16 mine other coal mine water releases.

The operators of the Isaac Downs Coal Mine also previously been issued with an Environmental Protection Order relating to significant issues regarding the management, identification, control and risk mitigation of water management on the site[5] casting some concern about their environmental management in respect to the management of water resources.

New and expanding coal mines will result in further simultaneous releases of contaminated water, particularly as the impacts of climate change result in more frequent and severe rainfall events. The frequent release of contaminated water into the Fitzroy Basin catchment is likely to adversely impact on the Great Barrier Reef.

EnvA recommendations

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[1, 2], and hence we recommend that Water resources (ss 24D and 24E) should be considered as a controlled action.

We further recommend that this Project has the potential to also impact on the following MNES:

(a) World Heritage (ss 12 and 15A),
(b) National Heritage (ss 15B and 15C),
(c) Commonwealth marine areas (ss 23 and 24A), and
(d) Great Barrier Reef Marine Park (ss 24B and 24C),

and call on you follow the precedent set in determining these as controlling provisions for the Blackwater Mine- North Extension Project[6].

Significant impact of Greenhouse Gas (GHG) emissions on MNES

The proposed Project would extend the life of the Isaac Downs mine for a further 22 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. The Proponent notes that that the GHG emissions presented in the supporting

[4] Fitzroy Basin coal mine water releases
[5] Environmental Protection Order – Isaac Downs Coal Mine 10 March 2022
[6] Statement of Reasons for a Decision on Controlled Action Under the Environment Protection and Biodiversity Conservation Act 1999. Blackwater Mine- North Extension Project

documentation are preliminary estimates that will be refined during the expected EIS process. The initial estimates indicate that the project will produce over 81 Mt CO_2-e.

EnvA's comments

These GHGs will significantly contribute to increased global temperatures 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.

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 coal mine to operate for 22 years is irresponsible and contrary to meeting legislated emission reduction targets and the legally binding international treaty on climate change[7].

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).

Given the clear and unacceptable environmental impacts of the Isaac Downs Extension 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 Isaac Downs Extension Project.

Yours sincerely,

Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland Inc.

[7] The Paris Agreement