

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

By email: Minister.watt@dcceew.gov.au

CC: epbc.referrals@dcceew.gov.au

31 July 2025

Dear Minister Watt and the EPBC referral team,

RE: New Lenton Coal Project – EPBC 2020/8778

We write to provide an update on matters raised in our submission on the Public Environment Report (**PER**) for the proposed New Lenton Coal Project (**the Project**) by New Lenton Coal Pty Ltd, a subsidiary of Bowen Coking Coal Ltd (**the Proponent**) under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**)¹.

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, and
- will further degrade wildlife habitats of state and national significance through both habitat loss and climate change.

Our submission¹ on the PER to the Proponent outlined our concerns which included:

- the impacts on listed threatened species and communities (ss 18 and 18A),
- the impacts to water resources (ss 24D and 24),
- the increased greenhouse gas emissions impacting on the environment and human rights, and
- the Proponent's suitability as an operator of an additional coal mine given the apparent lack of financial resources to manage their current assets and the uncertainty of the ongoing viability of the associated Burton Coal Mine.

¹ Submission on the draft Public Environment Report – New Lenton Coal Project – EPBC 2020/8778 (4 July 2025)



Environmental Advocacy in Central Queensland Inc.

Email: enva.cq@outlook.com

Phone: 0448 378 908 Web: https://envacq.org/

Facebook: https://www.facebook.com/EnvACQ

Since lodging our submission on 4 July 2025, we have become aware that the Proponent's financial position has further deteriorated, increasing the risk of multiple abandoned mines in the region.

We note that Bowen Coking Coal Ltd has made several announcements² to shareholders since our submission, including:

- the resignation of a non-executive director³,
- multiple suspension-of-trading notices²,
- a statutory demand for payment from BUMA Australia⁴,
- the refusal of its application to the Queensland Revenue Office for deferment of royalty payments⁵,
- cash flow reports indicating a challenging financial situation, and most recently⁶,
- the appointment of voluntary administrators^{7,8}.

We provide this supplementary information to further support our position that Bowen Coking Coal Ltd is not a suitable operator to undertake or expand mining operations.

The Proponent has already placed two mines in care and maintenance, and the Burton Coal Mine is also likely to be suspended due to ongoing financial distress. These circumstances significantly jeopardise mine closure and rehabilitation obligations—raising serious risks to the local environment and impacted landholders.

We again urge you to refuse the New Lenton Coal Project, based on both our original submission and this additional evidence, which clearly demonstrates the Proponent's lack of financial security and reliability.

Kind regards,

Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland Inc.

² Company announcements for BOWEN COKING COAL LIMITED (BCB)

³ Resignation of Non-executive Director

⁴ BUMA payment demand

⁵ Queensland Revenue Office State royalty deferral proposal declined

⁶ Bowen Coking Coal Quarterly Report (July 2025)

⁷ Company Update and Appointment of Voluntary Administrators

⁸ ABC (30 July 2025) Owners of Bowen Basin mine enter administration amid coal price slump