Bowen Coking Coal Ltd
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Cc: EPBC.Referrals@dcceew.gov.au

4 July 2025

Dear Bowen Coking Coal,

RE: Comment on the draft Public Environment Report – New Lenton Coal Project – EPBC 2020/8778

Thank you for the opportunity to make this submission in response to the Public Environment Report (**PER**)[1] 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**).

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

The proposed action

The Proponent is proposing to develop two open cut coal mining pits on the Mining Leases (**ML**) 70337, ML 700053 and ML 700054, located in the Bowen Basin approximately 50 km north of Moranbah, Central Queensland.

Approximately 1.9 million tonnes per annum (**Mtpa**) of metallurgical run of mine (**ROM**) coal would be mined over a period of 18 years. Overburden will be placed in in-pit and out of pit waste rock dumps, with a final void remaining at the end of mine life.

The total disturbance area is approximately 658 ha, comprising of two open cut pits, in pit and out of pit waste rock dumps, haul roads, Ti-Tree Creek diversion, flood levees, water

[1] Public Environment Report – New Lenton Coal Project (2020/8778)

management infrastructure, a Mine Infrastructure Area (**MIA**) and the re-alignment of Suttor Developmental Road.

ROM coal will be hauled to the adjacent Burton Coal Mine for washing in Burton Mine's coal handling and processing plant (**CHPP**), with product coal hauled to Burton Mine's train load out (**TLO**) facility and railed to Dalrymple Bay Coal Terminal (**DBCT**). Rejects from washing of Project ROM coal will be stored within Burton Mine's existing co-disposal areas within old mine voids.

The proposed action has been determined to be a controlled action under the EPBC Act. The controlling provisions are 'listed threatened species and communities (sections 18 & 18A)', and 'a water resource, in relation to coal seam gas development and large coal mining development (sections 24D & 24E)'.

ENVA'S SUBMISSION

Summary of concerns and recommendations

EnvA considers that the Project must be rejected as:

- the impacts on listed threatened species and communities (ss 18 and 18A) are clearly unacceptable,
- the impacts to water resources (ss 24D and 24) are clearly unacceptable,
- the increased greenhouse gas emissions will fuel more frequent and extreme weather events and the consequent impacts on Australia's natural environment and the people that live here without any decarbonisation measures are clearly unacceptable,
- there is no justification for the project given the Proponent's parent company has already placed two Central Queensland coal mines into care and maintenance with a third mine also expected to also be put on hold given the declining demand and price of coal, and
- the uncertainty of the Proponent's suitability as an operator of a new coal mine given the apparent lack of financial resources to manage their current assets.

Further detail in relation to our concerns and recommendations are provided below.

GROUNDS FOR SUBMISSION

Approval process background and concerns

The New Lenton Coal Mine was first proposed in 2012 by New Hope Corporation Ltd. (**New Hope**). The Proponent requested that the Project be assessed through a voluntary environmental impact statement (**EIS**), which was accepted by the Queensland[2] and the Commonwealth Governments[3]. At that time, the proposal included open-cut mining operations, the development and operation of a new bord-and-pillar underground mine, and associated infrastructure to produce up to 5 million tonnes per annum (Mtpa) of coking and thermal coal (8.2 Mtpa ROM coal).[4]

The Terms of Reference were finalised and issued to the Proponent on 27 June 2014. Under section 47 of the *Environmental Protection Act 1994* (EP Act), the Proponent had two years to prepare and submit an EIS. On 12 January 2016, the Proponent requested, and was granted, a two-year extension to 27 June 2018. However, the EIS was not submitted by that deadline, and

[2] New Lenton Coal Project (lapsed)
[3] EPBC Act – Decision on Assessment Approach: Bilateral Agreement
[4] EPBC (March 2012). Referral of Proposed action – New Lenton Coal Project

the EIS process was consequently suspended. On 5 May 2020, New Hope formally withdrew the Project.[5]

In August 2021, Bowen Coking Coal Ltd announced its intention to acquire the Burton Coal Mine and the Lenton Project, with the sale completed in mid-2022.[6]

The current proposal for the New Lenton Coal Mine now excludes underground mining and instead seeks to proceed only with open-cut operations, reducing the production rate to 1.9 Mtpa of coking and thermal coal. It remains unclear whether this figure refers to product coal or ROM coal.

EnvA is concerned that this revised Project has avoided assessment under the bilateral EIS agreement due to shortcomings in the Queensland Government's regulatory process — particularly the practice of scaling down proposals to reduce scrutiny. We are increasingly observing the Department of Environment, Tourism, Science and Innovation (**DETSI**) misapplying the threshold test for requiring an EIS. DETSI appears to rely narrowly on Appendix B of the *Criteria for Environmental Impact Statements for Resource Projects*[7], which indicates that greenfield coal mines producing under 2 Mtpa may not need an EIS—despite this being only one consideration and despite potential significant environmental impacts.

This practice has enabled proponents to initially propose "small" mines, only to apply for expansions later, thus avoiding the rigorous environmental scrutiny that would apply to a full-scale project. The New Lenton proposal appears to be a clear example of this approach—reducing the extraction rate to below 2 Mtpa to bypass the EIS requirement. This loophole has been exploited previously by Bowen Coking Coal.[8]

Further reinforcing our concerns is the Queensland Government's decision to issue an Environmental Authority (EA) on 23 September 2019 (EPML00475513)[9], which did not include conditions related to threatened species or ecological communities. The EA also deferred water management planning until prior to commencement, despite water resources being previously identified as a controlling provision.[10] This EA was later amended in January 2021[11] and again in 2024.[12]

EnvA also has concerns that this Project is dependent on the adjacent Burton Coal Mine coal handling and processing plant, transport through the Burton Coal train load out facility and the disposal of mine rejects within the Burton Coal mine voids. It has recently been reported that Burton Coal Mine maybe placed under care and maintenance due to the challenges of climate change induced flooding rainfall events and low coal prices.[13]

EnvA questions the viability of a project so dependent on the uncertain future of the Burton operations. Bowen Coking Coal, the parent company, appears to be experiencing financial difficulties. This raises serious questions about its capacity to manage a greenfield coal project and meet future rehabilitation obligations. We are aware that its financial reserves may be

[5] New Lenton Coal Project - Notification of Proposal Withdrawn
[6] Bowen Coking Coal (July 2022) – Completion of transformational acquisition of the Burton Coal Mine
[7] Queensland Government. Guideline: Criteria for environmental impact statements for resource projects under the *Environmental Protection Act 1994*
[8] Conservation group letter to the Federal Minister for the Environment (1 Nov 2022).
[9] Environmental authority EPML00475513 – New Lenton Coal Mine (23 September 2019)
[10] Australian Government - Final decision on whether water resources is a controlling Provision for the specified action (22 October 2013)
[11] Environmental authority EPML00475513 – New Lenton Coal Mine (20 January 2021)
[12] Environmental authority EPML00475513 – New Lenton Coal Mine (3 May 2024)
[13] Major Queensland coal mine facing termination with hundreds of jobs on the chopping block (21 June 2025)

insufficient to fund mine rehabilitation, potentially resulting in stranded assets and an unmet rehabilitation strategy if this Project is approved.

Given these issues—including the interdependency between the New Lenton and Burton operations, and the financial and environmental risks—EnvA considers it would be negligent to proceed without further scrutiny. We recommend a full assessment of the Proponent's financial capacity and a clear explanation of how operations will be managed if Burton Coal Mine enters care and maintenance.

Significant impact on threatened species and communities

As acknowledged by the Proponent in the PER[14], this Project will have significant residual impacts on threatened species and communities including direct impacts on:

- 112.2ha of Poplar box (*Eucalyptus populnea*) woodland on alluvial plains – Endangered,
- 192.3ha of squatter pigeon (*Geophaps scripta scripta*) habitat – Vulnerable,
- 327ha of critical koala habitat (*Phascolarctos cinereus)* - Endangered,
- 293 ha of greater glider (*Petauroides volans*) habitat - Endangered, and the
- White-throated Needletail (*Hirundapus caudacutus)* – Vulnerable and Migratory

In addition to the direct losses, the clearing of 397ha of vegetation will compound cumulative losses of critical habitat and further fragment the remaining habitat across the northern Bowen Basin – an area already under considerable ecological stress.

We further note that the area of Poplar Box woodland to be impacted and requiring an offset under the EPBC Act specified in the EA[11, 12] is 185.7 ha while an area of 112.2 ha is stated in the PER. We question the difference between the State approval and the current EPBC application.

Cumulative impacts

The Brigalow Belt bioregion, which includes the Northern Bowen Basin, is of both national and global conservation significance. It supports more bird species than any other Australian bioregion and is home to numerous endemic reptile species. Alarmingly, within this region:

- Eight species are now extinct, and
- 147 species and 100 ecological communities are listed as threatened.[15]

This region has already experienced some of Queensland's highest historical rates of land clearing—initially due to agriculture and settlement, and more recently driven by coal mining and gas development.[16]

The pre-clearing extent of native vegetation in the Northern Bowen Basin subregion is estimated at 1,316,957 ha. By 2021, this had been reduced to 774,291 ha—a loss of approximately 41%.[17] Subsequent clearing, largely attributable to resource extraction, continues to erode critical habitat and fragment wildlife corridors. Any additional loss—such as that proposed by this Project—will further undermine habitat connectivity and ecological function.

While the Proponent acknowledges some cumulative impacts, their significance is understated.

[14] Public Environment Report – New Lenton Coal Project (2020/8778). Chapter 6 – Listed Threatened Species and Ecological Communities

[15] CSIRO (2016) Priority threat management for imperilled species of the Queensland Brigalow Belt

[16] Queensland Government State of the Environment Report 2020

[17] Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. (2024). Remnant Regional Ecosystem Vegetation in Queensland (Version 13.0), Analysis 1997-2021. Queensland Department of Environment and Science: Brisbane.

According to the PER, the Project will affect:

- <0.4% of the current extent of remnant vegetation in the subregion,
- 1.2% of the remaining RE 11.3.2 associated with the Poplar Box Grassy Woodland on Alluvial Plains TEC,
- Key biodiversity corridors such as the Isaac River.

While these may seem like very small impacts, the cumulative impacts of many small losses add up to a significant impact.

The Proponent asserts that biodiversity offsets will adequately compensate for these impacts. However, as detailed below, EnvA strongly disagrees.

Offsets

The Proponent has identified a preferred 2,213 ha offset on the Kemmis Creek property (Lot 12 SP 303309), which is intended to fulfill the offset requirements for the koala, greater glider and squatter pigeon, and partially meet the offset requirements for the Poplar Box TEC.[18]

Th options presented for the Poplar Box TEC include:

- Reducing the Project's direct impacts by 5.95ha, or
- Providing a 58 ha compensatory offset area comprising other eucalypt woodland-regional ecosystems adjacent to the Poplar Box TEC areas to provide >100m buffers to the TEC.

The offset site is described as having higher habitat quality than the area to be cleared, and its condition is expected to improve under the Offset Area Management Plan (**OAMP**), with a goal of increasing habitat scores to ≥8 within 10 years and maintaining that score for a further decade. The current scores are 7 for the listed species and 8 for the Poplar Box TEC. The Proponent claims a 0.42% risk of loss without offset protection.

Other management measures include restricting access, managing fencing for livestock management, managing weeds and pest animals, and limiting and managing grazing.

EnvA considers that the proposed offset fails to meet the requirements of the *EPBC Act Environmental Offsets Policy*.[19] Specifically:

1. *Suitable offsets must deliver an overall conservation outcome that improves or maintains the viability of the protected matter (section 7.1)*

Offsets must deliver an outcome that improves or maintains the viability of the protected matter relative to a "do nothing" scenario. In this case, the offset area already supports the listed species, and no evidence is presented to demonstrate that it can sustain higher population densities or expanded ecological functions. This means the offset does not create *new* habitat or improve long-term viability; rather, it preserves what already exists. Therefore, it fails to provide an additional conservation outcome, and

2. *Tenure for direct offsets (section 7.2.1)*

To constitute a legitimate offset, the site must be legally secured in a way that ensures long-term protection and management.

As identified in the PER[16], the proposed offset area is regulated under the *Vegetation Management Act 1999* (**VM Act**), which already limits broadscale clearing. With only a 0.42%

[18] Public Environment Report – New Lenton Coal Project (2020/8778). Chapter 7 – Biodiversity Offsets
[19] EPBC Act Environmental Offsets Policy (October 2012)

risk of clearing, the area is not considered under imminent threat.

The use of a *Voluntary Declaration* under the VM Act—while legally recognised—is insufficient for enduring protection. The declaration is dependent on the landholder's agreement and only remains in place until the objectives of the OAMP are achieved, the declaration ends (s.19J and 19L), or when the authorised activities have ended.[20]

There are also unresolved risks, including:

- A lack of confirmed agreement with the landholder to secure the offset area.
- Inadequate long-term commitments to manage the offset effectively beyond the life of the OAMP.

EnvA holds concerns about the general ineffectiveness of biodiversity offsets in Australia. Since the Queensland Environmental Offsets Policy was introduced in 2014, biodiversity indicators—including vegetation extent and condition, and populations of threatened species—have continued to decline.[21] Even the Federal Environment Minister acknowledged in 2023:

"We know the current offset arrangements are broken and making nature worse." [22]

Avoidance of impact—not offsetting—must remain the priority. Offsets should only ever be used as a last resort.

The Project will result in the loss and fragmentation of critical habitat for multiple endangered and vulnerable species in an already heavily disturbed bioregion. The proposed offset fails to meet key policy tests of additionality, enduring protection, and genuine conservation gain.

Given the cumulative ecological losses, poor precedent for long-term offset success, and lack of confidence in the offset's effectiveness, EnvA recommends the Project be refused on the basis that the impacts on threatened species and communities are clearly unacceptable.

Significant Impact on Water Resources

Surface Water

The Proponent has proposed that the water management for the project will be integrated with the Burton Coal mine water management system on the basis that the overall balance of water supply and demand can be better managed. Burton Mine contains mine pits / voids where water can be stored and hence it is proposed that mine affected water will be transferred to and from Burton Mine depending on supply and demand at the Project. Mine affected water would be stored in three dams at the Project, with no change to mine affected water storages at Burton Mine.

Sediment dams are proposed to capture sediment-laden runoff, primarily from the overburden dumps. The runoff collected in the dams will be released to the downstream environment in accordance with the erosion and sediment control plan (ESCP) or pumped back into the mine water system to maintain capacity for dust suppression and other operational requirements.

The water balance model indicates that the import volumes from the Burton Coal Mine will be greater than the export volumes and there will be no uncontrolled releases from mine affected water dams, but the PER acknowledges that sediment dams will overflow when rainfall exceeds design standards.[23]

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[20] PER – Appendix 26. Offset Area Management Plan – April 2025

[21] Queensland Government (2020) State of the Environment Report – Biodiversity and Terrestrial Ecosystems

[22] The Guardian (2024) A third of land set aside for restoration in worse state than before, Australian offset audit finds

[23] PER – Executive Summary – April 2025

While the proponent intends to minimise uncontrolled discharges of coal mine affected waters and intends to maintain the quality of water to be released during wet periods, they also note that there is inherent uncertainty with respect to some key site characteristics (e.g. catchment yield/rainfall runoff, mining area groundwater inflows) and have provided details of potential release points and the monitoring which will occur to enable coal mine water releases.[24]

In the context of climate change—specifically, the increasing intensity and frequency of extreme weather events—there is an elevated risk of uncontrolled mine water discharges from many coal mines including potential and likely releases from the proposed Project.

During the last wet season, multiple concurrent mine water releases were reported from Central Queensland coal mines across the Great Barrier Reef (**Reef**) catchment.[25] Without stringent controls, the cumulative impact of expanding and new coal mines will likely contribute to water quality degradation in waterways that flow directly into the Great Barrier Reef.

Other significant water infrastructure proposed to prevent the ingress of flood water into the mining pits and proposed final mine void include:

- a constructed channel to permanently divert Ti-Tree Creek,
- a levee to protect mine operations from flooding of Ti-Tree Creek diversion, and
- a levee to protect mine operations from Isaac River flooding.

Replacing 4.95 km of Ti-Tree Creek with a 2.8-km diversion is likely to sever hydrological connection to the lower creek, reducing riparian vegetation health, aquatic habitat, and downstream water quality due to erosion and sedimentation.

EnvA further notes that this Project will increase the cumulative and permanent loss of approximately 13% of the catchment flows of 'clean water' into the upper Isaac River and Reef catchment. The Proponent considers this to be a 'small impact' that will be dissipated by the management of the Burton Gorge Dam which controls the downstream flows into the Isaac River – a concept that does not negate the impact of the Project on surface water.

Given that the Project will result in changes to the flows and flooding regime in the Isaac Creek and Ti-tree Creek catchments due to the capture of runoff within onsite storages, pits and a residual void, the high potential that mine-affected water will be released into local waterways, EnvA recommends the Project be refused on the basis that the impacts on water releases are clearly unacceptable.

We further have serious concerns in respect to the reliance on water management being integrated with the Burton Coal mine given the current uncertainty of the future of this mine.[13]

Groundwater

The main aquifers identified within and surrounding the Project area are:

- Quaternary alluvium, where saturated, associated with the creeks and Isaac River (basal alluvium) which supports shallow perched groundwater systems close to the Isaac River and basal groundwater at 10-14m depth,
- Regolith where saturated (mainly comprised of weathered bedrock) which hosts groundwater at various locations across the Project area, and

[24] PER – Chapter 4 Surface Water
[25] Fitzroy Basin coal mine water releases

- Permian fractured rock aquifers which will be impacted in the western extent of the Project area.[23]

The Proponent notes that the riparian vegetation associated with the Isaac River is dependent on groundwater, and that there is a potential 12m drawdown along the southeastern edge of the East Pit and a 2m drawdown both up and downstream of the predicted maximum drawdown.[26] This projected drawdown will impact on groundwater dependent ecosystems (**GDEs**) which are mostly identified as TECs and which provide important habitat for threatened species such as the koala and greater glider.

The proponent has also identified stygofauna, particularly in the alluvial and regolith shallow groundwater systems. As was highlighted in the Independent Expert Scientific Committee (**IESC**) report[27] on this proposed Project, the perched groundwater refers to groundwater primarily recharged by infiltration from surface runoff and ephemeral stream channels, that support terrestrial GDEs but are frequently disconnected from the regional water table (and hence not captured by conventional groundwater models). The term 'alluvial aquifer' refers to aquifers in the alluvium (and sometimes the regolith) associated with watercourses and primarily recharged by river flow, used by stygofauna and terrestrial GDEs. The alluvial aquifer is connected to and part of the regional groundwater system, simulated by the proponent's groundwater model.

The Proponent assumes perched groundwater is restricted to the Isaac River alluvium. However, this assumption disregards the likelihood that perched aquifers exist more broadly and could be impacted by altered overland flow and flood regimes, affecting vegetation and GDEs beyond the modelled zone.

The altered recharge to alluvial aquifers and the estimated drawdown of the water table is likely to adversely impact on the identified stygofauna and other aquatic GDEs.

Again, EnvA considers that there are likely to be significant impacts on groundwater and GDE's and that the cumulative impacts of this Project and the Burton Coal mine through the lowering of groundwater levels during mining operations, are clearly unacceptable.

Greenhouse Gas (GHG) emissions

The Proponent has not provided any assessment of the GHG emissions for the project, nor are any decarbonisation measures proposed. There is no information as to how this project will align with the legislated emission reduction targets, but only a broad commitment to meet the requirements of the Commonwealth legislation. From this information, it is not clear how the proponent can claim that the Project will not impact on the national GHG emissions targets.[23]

The scientific consensus is unequivocal: expansion of fossil fuel production is incompatible with limiting global warming to safe levels.[28] Australia, alongside 196 other nations, is a signatory to the Paris Agreement, which commits countries to pursue efforts to limit warming to 1.5°C and well below 2°C.[29] Meeting these targets requires the immediate cessation of new fossil fuel developments.

According to the International Energy Agency, reaching net zero emissions by 2050 leaves no room for new coal mines or extensions. Even metallurgical coal must be phased out rapidly to

[26] PER- Chapter 5 - Groundwater

[27] IESC 2024-147: New Lenton Coal Project (EPBC 2020/8778) – New Development

[28] Intergovernmental Panel on Climate Change, *Climate Change 2022*

[29] UN Framework Convention on Climate Change, Adoption of the Paris Agreement, 21st Conference of the Parties, Paris (2015)

remain within carbon budgets compatible with 1.5°C or 2°C pathways.[30]

The continued accumulation of GHGs in the atmosphere has already altered Australia's climate, with direct and measurable impacts, including:

- Increased frequency and severity of heatwaves
- Longer and more intense fire seasons
- More severe flooding events due to altered rainfall patterns
- Repeated mass coral bleaching events on the Great Barrier Reef
- Intensified drought conditions

Legal and policy inconsistency

Approval of the Project would be inconsistent with:

- The precautionary principle, which mandates action in the face of scientific uncertainty where there is a risk of serious or irreversible harm
- Australia's international and domestic climate commitments, including:
    - The Paris Agreement
    - The *Climate Change Act 2022* (Cth)
    - The Queensland Climate Action Plan 2030
    - The Safeguard Mechanism
    - The Intergovernmental Agreement on the Environment
    - The National Strategy for Ecologically Sustainable Development
    - Australia's Strategy for Nature 2019–2030

The Project would also have unacceptable impacts on the character, resilience, and ecological value of the surrounding region, including:

- Regional ecosystems and biodiversity
- Natural and physical resources
- Scientific and conservation values
- Community well-being, amenity, and social cohesion

Human rights risks

Approval of the Project would limit the following human rights protected under the *Human Rights Act 2019* (Qld)*:*

- Right to life (s 16)
- Cultural rights of First Nations Peoples (s 28)
- Rights of children (s 26)
- Right to property (s 24)
- Right to privacy and home (s 25(a))
- Right to non-discrimination (s 15(2))

These risks must be weighed against any projected economic benefits, particularly where those benefits are contingent on activities that exacerbate the climate crisis.

Given the significant environmental, legal, and social concerns identified above, this Project should not proceed. At a minimum, any consideration of approval must be deferred until the Proponent submits a comprehensive and independently verified greenhouse gas abatement plan, along with credible emissions projections that align with established climate science and Australia's policy commitments.

[30] International Energy Agency (2024). World Energy Outlook 2024

Insufficient justification

EnvA firmly strongly contends that there is no credible or compelling justification for this Project to proceed.

The Proponent considers that they "have made a valuable contribution to the local community by re-commencing operations at Burton Mine (following a period of care and maintenance under previous owners)", but as previously noted, there remains uncertainty in the future operations at Burton Coal.

The Proponent also claims that this Project will contribute to a stable and increasing workforce in the local area with the approximate 150 workers employed during operations which "will contribute positively to the health and community well-being as a result of additional certainty of employment".

This is further supported with the usual coal mine rhetoric that the Australian Government is predicted to receive significant direct and indirect tax revenue from the Project, and the Queensland Government is expected to earn substantial royalties from the Project. The Proponent states that "Without the Project approval the associated employment and economic benefits will not be realised."[23]

Bowen Coking Coal, the parent company of the Proponent has already placed two of its coal mines under care and maintenance (Broadmeadow East and Bluff mines)[31] and there is a strong possibility that the Burton Coal mine may also be shelved due to the current low coal prices and increasing costs of operations,[32] which in our thinking negates the proposed economic and employment benefits.

Further to this, predictions from the World Bank indicate that coal prices are falling and will continue to fall in 2026 due to a weak import demand from Asia and a potential supply glut.[33]

It is our strong view that there is absolutely no justification to allow the further significant impacts on the environment and our climate when the Proponent has currently approved but stalled coal mines that can meet the economic and employment benefits purported. A greenfield coal mine commencement will only add to the likelihood of further stranded assets, environmental impacts and delay in the rehabilitation of already scarred and impacted areas.

Thank you again for the opportunity to comment on this proposal and we appreciate your attention to our concerns.

Kind regards

Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland Inc.

[31] Bowen Coking Coal (3 July 2025) ASX announcement
[32] Bowen Coking Coal (26 June 2025) ASX announcement
[33] World Bank (2 June 2025) Weakening demand, steady supply: What's driving coal's price decline in 2025?