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1 October 2025

Attention: Jessica Edgar

## **Re: Submission on the proposed amendment to Environmental Authority (EPML00579213) for the Coppabella Coal Mine**

Thank you for the opportunity to make this submission on the proposed major amendment to Environmental Authority EPML00579213<sup>1</sup> (**EA**) for the Coppabella coal mine (**the Project**). Peabody Coppabella Pty Ltd (**the Proponent**) has submitted the amendment application (A-EA-AMD-100600739) on behalf of the Coppabella Moorvale Joint Venture.

### **About EnvA**

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 environmental, climate, and community impacts of coal mining and coal seam gas extraction in Central Queensland,
- the legacy impacts of coal and gas, including permanent disruption of ecological processes and diminished water quality, and
- stranded assets that are not appropriately removed or rehabilitated, either intentionally or due to the financial position of the Proponent.

### **The Project**

The Coppabella Coal Mine is an open cut coal mining operation that produces pulverised coal injection (**PCI**) coal, semi-soft coking coal and thermal coal for export in five Mining Leases (**ML**): ML 70161, ML 70163, ML 70164, ML 70236, ML 70237 and Petroleum Lease PL 1015. The Project is located approximately 10km north-east of Coppabella and 31km south-east of Nebo within the Isaac Regional Council in Central Queensland.

The application relates to:

- changing the rehabilitation objective for the four approved residual voids (80ha) from Post-Mining Land Use (**PMLU**) to Non-Use Management Area (**NUMA**),
- include an additional 380ha of NUMA to cover the high and low walls associated with the proposed single larger void while maintaining the 80ha water-filled void area,
- including additional disturbance areas associated with creek diversions and mine void(s).

<sup>1</sup> [Environmental Authority EPML00579213](#)



## 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. The proposed amended rehabilitation will leave a permanent scar on the local landscape, risk long-term environmental harm to water quality and fail to deliver rehabilitation outcomes originally approved under the EA.

EnvA also considers that this EA amendment application is incomplete. It seeks approval to expand disturbance areas and increase NUMAs without addressing the associated mine expansion currently referred for assessment under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*.<sup>2</sup>

Further to this, the Department of Environment, Tourism, Science and Innovation (DETSI) [public notices and consultation](#) website provided the proposed amendments (deemed minor amendments by the proponent in their application) as:

### ENVIRONMENTAL PROTECTION ACT 1994

#### Section 152

#### Application notice

#### Resource activity: Mining activity relating to a mining lease

It is advised that PEABODY ENERGY AUSTRALIA has lodged an amendment application for an environmental authority in accordance with the requirements of the *Environmental Protection Act 1994*. The environmental authority being amended is EPM100579213.

The application relates to an amendment to the environmental authority (EA) based on inconsistencies identified in the rehabilitation and residual void conditions of the approved mining plan.

An amendment to the EA is required due to the following issues:

- Inconsistent surface Areas
  - Projected surface areas in Table C1 are not aligned with current lease areas or the current plan to maximise resource extraction.
- Unassigned Land Use
  - Residual voids listed in Table C1 do not have a proposed post-mining land use.
- Void Configuration Mismatch
  - Table C3 authorises four discrete final voids, which does not reflect the intended final landform configuration.
- NUMA Components Not Addressed
  - Low walls, end walls, and highwalls—classified under the Waste Management Plan (WMP) as part of the NUMA—do not have a proposed land use in the EA.
- Water Quality Concerns
  - Water quality within the residual void(s) is incompatible with any proposed post-mining land use (PMLU), necessitating reconsideration of land use planning.

<sup>2</sup> [Coppabella Mine Humbug Gully Project \(EPBC 2024/09867\)](#)

Of particular concern, the application references correcting an “inconsistent surface area ... not aligned with the current lease areas or the plan to maximise resource extraction.” Yet the proposed mine expansion and diversion of Humbug Creek are not detailed in the EA amendment. This piecemeal approach prevents proper assessment of the Project’s full impacts.

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

## **NUMA objectives are not justified**

The Mined Land Rehabilitation Policy<sup>3</sup> and Queensland Government’s regulatory requirements and guidelines<sup>4</sup> for assessing proposed NUMAs under the EA Act<sup>5</sup> 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
    - 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 having only consulted with affected landholders. 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.

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<sup>3</sup> [Mined Land Rehabilitation Policy](#)

<sup>4</sup> [Non-Use Management Areas – Information Sheet](#)

<sup>5</sup> [Queensland Environment Protection Act 1994, Section 126D\(2\)](#)

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 PMLU<sup>6</sup>.

### **Staged assessment is inadequate**

EnvA is aware of the proposed expansion of the Coppabella Coal Mine from the EPBC approval application<sup>7</sup> and the information provided in the supporting information documents for the Project. However, the proposed waterway diversions and proposed mine expansion is not included in the current application and is not detailed in the current EA (EPML00579213).

By way of example, section 5 of the supporting information<sup>8</sup> states that Peabody are planning alternate alignments of the Thirty Mile Creek North and South Arm diversions as part of mine rehabilitation and closure arrangements. These waterway diversions are integral to the proposed landform design.<sup>9</sup>

As outlined in our submission on the EPBC referral<sup>10</sup>, the Project will have significant impacts of threatened species and communities, water resources and will extend the emissions of greenhouse gases until 2042.

We further note that the Proponent considers that there are already State approvals in place, as mining leases ML 70161 and ML 70163 were granted on 14 May 1998, and ML 70164 on 13 August 1998. These approvals were based on Environmental Management Overview Strategy (EMOS) Coppabella Coal Project MLA 70161, MLA 70163 and MLA 70164, prepared in accordance with the 'then provisions' of the *Mineral Resources Act 1989*.<sup>11</sup>

The Proponent also asserts that ML70236 was assessed under the 2000 EMOS, and that the Land and Resources Tribunal Queensland recommended that the mining lease be granted. The tribunal accepted that "the whole of the surface area [of Mining Lease 70236] is required for mining activities" and stated: "the area applied for on ML 70236 totalling 581.8ha is accepted as the surface area is required for mining activities, including associated infrastructure and haul roads, and that that was determined having regard to the area of mineralisation and availability of the resource within the application area".

EnvA contends that any approval(s) granted for land clearing over 25 years ago are not inline with current environmental requirements and are not approved in the EA that the Proponent is currently operating under. We further contend that the proposed waterway diversions have not received State government approvals.

It appears that the Project application relies heavily on yet-to-be approved waterway diversions as the basis of the proposed final landform. EnvA recommends that the request to increase the disturbance areas to allow for mine expansions and waterway diversions should be refused.

The staged approach to EA amendments does not provide the opportunity to make meaningful comment on the impacts of the project on the local environment or properly evaluate the full impacts of the proposed project and final landform.

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<sup>6</sup> [Office of the Queensland Mine Rehabilitation Commissioner \(2023\) Identifying a post-mining land use for residual mine voids – Implications for leading practice](#)

<sup>7</sup> [Coppabella Mine Humbug Gully Project EPBC Referral \(EPBC/09867\)](#)

<sup>8</sup> [SGM environmental \(2024\) Supporting Information – application to amend EA EPML00579213](#)

<sup>9</sup> [Peabody \(2023\). Appendix A – Coppabella Landform Design Report](#)

<sup>10</sup> [EnvA's submission on the referral of the Coppabella Mine Humbug Gully Project \(EPBC 2024/09867\)](#)

<sup>11</sup> [Coppabella-EA-EPML00579213-Information-Request-Response](#)

## Conclusion

EnvA submits that the application to reclassify mine voids as NUMAs should be refused. The proposal is inconsistent with rehabilitation requirements, not in the public interest, and unsupported by evidence. It carries unacceptable long-term risks for water quality, biodiversity, and local communities.

Further, DETSI should not consider this amendment separately from the broader mine expansion and water diversion proposals. Piecemeal approvals undermine robust decision-making and prevent a genuine assessment of cumulative impacts.

The Project appears to be a cost-avoidance exercise rather than a credible rehabilitation strategy. Genuine rehabilitation to safe, stable, and non-polluting landforms is achievable and required under Queensland law.

For these reasons, EnvA strongly urges refusal of the amendment application.

Thank you again for the opportunity to comment.

Thank you again for the opportunity to provide comment on the Coppabella Mine amendment application.

Yours sincerely,



**Dr Coral Rowston**

Director

Environmental Advocacy in Central Queensland