

The Chief Executive
Department of Environment, Science and Innovation
Attention: The EIS Coordinator (Isaac Downs Extension Project)
GPO Box 2454
BRISBANE QLD 4001
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3 October 2025

Dear Chief Executive

RE: Isaac Downs Extension Project – Draft Terms of Reference

Thank you for the opportunity to make this submission in response to Draft Terms of Reference (**TOR**) for Stanmore ID Extension Pty Ltd (**the Proponent**) Isaac Downs Extension Project (**the Project**).

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 or expanding existing coal and gas projects:

- is contrary to meeting Australia's emission targets and Queensland's emission targets – both are far too low to prevent continued harm to our environment,
- 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.

The Isaac Downs Extension Project

The proposed Project aims to extend the life of mining operations at Isaac Plains Complex (**IPC**) through the development of an open-cut coal mine pit and associated infrastructure.

Approximately 46 million tonnes (**Mt**) of run of mine (**ROM**) coal will be mined over 15 years, which is approximately 2—4.5 million tonnes per annum (**Mtpa**). The project will supply a total of approximately 30 Mt of primarily metallurgical coal product, at a rate of around 1.5—3 Mtpa.

The project area comprises approximately 2,707ha, and a disturbance area of 2080ha within ML application (MLA) 700081, MLA 700082, MLA 700083 and MLA 700084. The project area would be located approximately 15 kilometres southeast of Moranbah within the Isaac Regional Council local government area.



The project would be integrated with the existing mining operations at IPC. The project would utilise existing surface infrastructure including the coal handling and processing plant (**CHPP**), rejects and tailings disposal in existing mining dumps and voids, train loading facility, rail loop, mine infrastructure area, internal haul roads, explosives magazine, and connections to raw water, power and communication supply. The project would also continue to utilise the same mining approach and type of equipment that is currently employed at the IPC.

On 16 May 2025 Stanmore ID Extension submitted an application for a voluntary Environmental Impact Statement (**EIS**) which was approved by the Department of the Environment, Tourism, Science and Innovation (**DETSI**) on 17 June 2025.

The project was determined to be a controlled action (EPBC 2025/10183) under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**). The controlling provisions are:

- listed threatened species and communities (sections 18 and 18A), and
- a water resource, in relation to unconventional gas development and large coal mining development (sections 24D and 24E).

The EIS process will assess potential impacts of the project on the controlling provisions as an accredited assessment process under section 87(4) of the EPBC Act.

Stanmore ID Extension submitted the draft terms of reference (**TOR**)¹ for an EIS for the proposal to the department on 8 August 2025, with the draft TOR released for public consultation on 2 September 2025.

EnvA's comments on the draft TOR

EnvA is strongly opposed to the Project as it will cause to loss of habitat for threatened species and ecosystems, significant impacts on water resources, enhanced environmental degradation, and social impacts associated with land disturbance and climate change acceleration from the associated greenhouse gas emissions².

We do commend the thoroughness and detail contained in the draft TOR, but recommend the following revisions to ensure that the impacts of the Project can be appropriately addressed:

Project description and alternatives (section 7)

Various methodologies are required to be justified throughout the draft TOR. Section 7.3(e) appears to be the only reference to the opportunity for the Proponent to provide background to the project's development and justification for its need.

Both the Queensland and Federal Government environment departments claim to assess all projects to ensure that they "stack up" on an assessment of the social and environmental risks against the economic benefits.

All coal projects impact the environment directly through land clearing, changes to hydrology from subsidence, impacts on ground and surface water quality and quantity, and air quality. The additional indirect impacts on the environment stem from the emissions of greenhouse gases which are major contributors to accelerated climate change. Climate change is already significantly impacting on ecosystems, species and communities dealing with more frequent and severe weather events.

While we note section 7.13 of the draft TOR, EnvA strongly believes that the Proponent must be required to provide a thorough triple-bottom-line assessment rather than just relying on the economic benefits and claims that "we need more coal" without the quantitative assessment of environmental and social impacts.

¹ [Stanmore ID Extension \(August 2025\). Draft terms of reference – Isaac Downs Extension Project](#)

² [EnvA submission on the EPBC referral – Isaac Downs Extension Project \(19 May 2025\)](#)

The environmental impact assessment process (section 8)

EnvA is very concerned about the cumulative impacts of land clearing and the impacts of climate change due to the establishment or expansion of coal mines on threatened species and ecosystems.

We have reviewed many Central Queensland coal projects and find a recurring list of impacted species and ecosystems. Some of these species, such as the koala and greater glider, are declining so rapidly that they have recently been reclassified from vulnerable to endangered in Queensland.

In 2025, federal approvals for koala habitat destruction reached record levels – nearly 4,000 hectares – up from 3,000 hectares in 2024.³ These figures exclude additional clearing not referred under the EPBC Act. The Queensland Statewide Landcover and Tree Study shows that nearly two million hectares of likely koala habitat has already been cleared.⁴ We also refer to the long list of 148 projects under EPBC assessment in May 2024.⁵

While the draft TOR requires cumulative impacts to be addressed, it lacks specific guidance on methodologies for measuring these impacts or assessing their significance.

Australia's most recent State of the Environment Report⁶ and the bold aim of the Australian Government to prevent any further extinctions in the Threatened Species Action Plan 2022-2032⁷ will require all new coal and gas projects to better assess and document direct, cumulative and indirect impacts on threatened species and communities.

There is substantial evidence⁸ that climate change is a significant threat to an overwhelming number of listed threatened species and communities. The Project with a proposed additional 46 million tonnes of ROM coal will result in an additional over 110 million tonnes of greenhouse gas emissions over the life of the mine.⁹

EnvA recommends that further direction in measuring and assessing cumulative impacts are incorporated into the TOR based on the cumulative impacts on:

- threatened species and communities at sub-catchment, catchment, State and National level,
- water quality entering the Great Barrier Reef at a catchment scale,
- water availability and use in a changing environment, and
- greenhouse gas emissions on all matters of State and National environmental significance.

Thank you again for the opportunity to make comment on the Draft Terms of Reference for the Isaac Downs Extension Project.

Kind regards



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland

³ [Australian Conservation Foundation \(2025\). Koalas in crisis: National nature laws are allowing rampant bulldozing of koala habitat](#)

⁴ [Queensland Government. 2022–23 SLATS Report](#)

⁵ [Questions on Notice \(IQ24-000073\) - Climate Change, Energy, the Environment and Water Portfolio \(May 2024\)](#)

⁶ [Australia State of the Environment Report \(2021\)](#)

⁷ [Australian Government \(2022\) Threatened Species Action Plan 2022-2032](#)

⁸ [Living Wonders. Explore the evidence on Australia's living wonders](#)

⁹ Determined using an estimate of total product volume of coal x 2.4