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RE: Submission on Notification of Publication of Preliminary Documentation: Invitation to Comment on the Middlemount Coal Mine Extension Project (EPBC 2021/8920)

Environmental Advocacy in Central Queensland (**EnvA**) welcomes the opportunity to comment on the Preliminary Documentation for the proposed Middlemount Coal Mine Extension Project (**the Project**).

EnvA is a Central Queensland community association concerned about the risks associated with coal mining, coal seam gas, and climate change. We are particularly concerned about the growing number of new and expanding coal projects in the region and their cumulative impacts on threatened species, water quality, and greenhouse gas emissions.

The proposed action

Middlemount Coal Pty Ltd (**the Proponent**) is seeking approval under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**EPBC Act**) to extend the Middlemount Coal Mine to the south within Mining Leases (ML) 70379 and 70417.

The main activities associated with the Project include the:

- realignment and extension of the approved (but not yet constructed) eastern diversion of Roper Creek
- within ML 70379 and the realignment of Roper Creek within ML 70417,
- minor extensions to the East Dump within ML 70417,
- re-positioning of the approved southern flood levee and associated water management infrastructure within ML 70379,
- extension of the southern flood levee and associated water management infrastructure within ML 70417,
- development of sediment dams and other water management equipment and structures,
- continued development of internal roads, soil stockpiles, laydown areas and borrow areas,
- a change to the final landform for the end of the mine life, and
- continued extraction of ROM coal up to approximately 5.7 Mtpa using conventional open cut mining equipment until 2044.

The Project is located approximately 90km north-east of Emerald and 4km south-west of Middlemount in the northern Bowen Basin. It and will result in an additional disturbance footprint of approximately 250.22ha¹.

¹ [Middlemount Coal \(August 2025\) Southern Extension Project \(EPBC 2021/8920\) - EPBC Act preliminary assessment documentation](#)



The current Middlemount Coal Mine operates under Environmental Authority (EA) EPML00716913. The Proponent notes in the Executive Summary that a major amendment of this EA for this Project was approved by the Queensland Government on 19 April 2021; however, our searches of the quoted EA failed to locate an approval on this date. We acknowledge that the Project has received State Government approval, but clarity on this reference is required.

The Proponent is now seeking approval of the Project under the Commonwealth *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*. The Project was determined to be a controlled action on 17 June 2021² with the following controlling provisions:

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

RECOMMENDATION

EnvA recommends that this Project be refused due to:

- Unacceptable direct and cumulative impacts on threatened species and communities in an already highly degraded landscape,
- Unacceptable direct and cumulative impacts on water quality and riparian ecosystems,
- the lack of appropriate replacement offsets, and
- the insufficient justification of the benefits of the Project.

GROUNDINGS FOR SUBMISSION

Approval process

EnvA is of the view that an assessment by way of outdated preliminary documentation was inappropriate. While we accept that the decision was subject to further information, the information provided³ does not meet the content requirements which required that the preliminary documentation must:

- Be a stand-alone document containing sufficient information to avoid the need to search out previous or supplementary reports.
- Enable interested stakeholders and the Minister to easily understand the consequences of the project on matters of national environmental significance (MNES).
- Be written so that any conclusions reached can be independently assessed. Include all key claims, findings, proposals and undertakings in the main document.
- Refer to all relevant standards, policies and other guidance material published by the department. Any instances where published guidance is not followed must be justified.

The documentation provided does not satisfy these requirements and fails to provide sufficient information for meaningful public comment within ten days of notice. The Executive Summary includes potentially misleading information regarding Queensland Government approvals (noted above).

Of further concern is that the Proponent has assessed the potential impacts on koalas and greater gliders as “vulnerable”, claiming that was their conservation status at the time of the controlled action decision, despite both species being listed as *endangered* at the time of public consultation and at the date of the preliminary documentation (sections 2.5 and 2.6)¹.

² [Australian Government \(17 June 2021\) Referral decision - Middlemount Southern Extension, Middlemount, Queensland \(EPBC 2021/8920\)](#)

³ [Middlemount coal. Southern Extension Project – Attachment B Request for Preliminary Documentation](#)

Biodiversity Australia provided additional flora and fauna survey information in 2025, but these were based on surveys undertaken in June 2020⁵. In their report, it was argued that additional offset areas would be provided as part of the approval process to compensate for the residual impacts on threatened species and communities. However, the “Attachment G: Middlemount Coal Mine Offset Management Plan/Vegetation Management Plan Addendum” was not provided with the preliminary application and cannot be adequately assessed in this submission.

As such, the documentation does not allow the conclusions reached to be independently verified, as key claims, findings and undertakings are missing. Much of the information is outdated and inconsistent with current legislation, policy and guidelines regarding threatened species, rehabilitation and water management.

Justification

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

The World Bank identifies that coal prices are falling and will continue to fall in 2026 due to a weakening import demand from Asia and a potential supply glut⁴. Treasury modelling similarly predicts that the value of Australia’s coal and gas exports will fall by around 50% over the next five years.⁵

Given these market trends, there is no justification to allow further environmental and climate damage for a project that may not yield genuine economic or social benefits. Proceeding with the Project would be inconsistent with the EPBC Act’s principles of ecologically sustainable development, given the lack of demonstrable economic benefit and the irreversible environmental harm.

The Proponent considers that there are no alternatives, other than not proceeding with the project. The outcomes provided by Proponent for not proceeding with EnvA’s response include:

- The existing Middlemount Coal Mine would continue to operate, as approved, until 2037
EnvA’s comment: This outcome aligns more closely with State and Federal emission reduction targets and the transition to a new energy economy. Extending the mine for a further seven years is contrary to these targets and would increase environmental, social, and economic costs.
- Operating costs at the Middlemount Coal Mine would remain higher due to the higher strip ratio associated with the approved mine plan.
EnvA’s comment: Expanding a coal mine to reduce the costs of current approvals at the expense of the environment and Australian communities is not considered to be a solid justification for the Project.
- An incremental net benefit of approximately \$77 million (in net present value terms) to the Proponent would be foregone.
EnvA’s comment: This valuation appears based on outdated coal prices and is not weighed against the environmental and social costs of extending the project beyond 2037. Company profits must be considered in light of the broader costs to Queenslanders.
- The surface area of the residual voids at the end of mining would be larger than proposed as part of the Action.
EnvA’s comment: Residual voids are generally non-use management areas containing water which over time is unusable for any use due to high salinity. While we commend the concept

⁴ [World Bank \(2 June 2025\) Weakening demand, steady supply: What’s driving coal’s price decline in 2025?](#)

⁵ [Australian Government \(September 2025\) Australia’s Net Zero Transformation: Treasury Modelling and Analysis](#)

of reducing the size of the residual voids, it is not a suitable reason for clearing important threatened species habitat.

- The additional potential environmental impacts for the Action described would not occur. EnvA's comment: This provides a strong justification for not proceeding with the Project.
- The additional surface development area would not be disturbed and therefore the additional biodiversity offset areas (Section 2.9) would not be established.

EnvA's comment: The proposed offset area is approximately 1,555ha in area including 1,305ha of woodland vegetation. It is difficult to ascertain the detail of the proposed offset as Attachment G (Middlemount Coal Mine Offset Management Plan/Vegetation Management Plan Addendum) was not provided with the Preliminary Documentation⁶. However, we note that the additional offset would be secured through a voluntary declaration under the *Vegetation Management Act 1999*. It is our understanding that remnant vegetation is already protected from clearing under this Act and hence is not evident that this is replacing the loss of habitat of threatened species and communities.

Significant impact on threatened species and communities

The project would or has the potential to impact on numerous threatened species and communities listed under the EPBC Act. Of note, the Proponent has identified direct impacts on:

- 3.48ha of brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered),
- 43.88ha of Poplar Box threatened ecological Community (TEC) (Endangered),
- 183ha of koala habitat (*Phascolarctos cinereus*) (Endangered),
- 81.7ha of greater glider habitat (*Petauroides volans*) (Endangered),
- 250.22ha of squatter pigeon habitat (*Geophaps scripta scripta*) (Vulnerable), and
- 17.21ha of ornamental snake habitat (*Denisonia maculata*) (Vulnerable).⁷

These species are regularly identified in new and expanding coal mine proposals in the northern Bowen Basin. Many have declined in recent years—for example, the koala and greater glider were both reclassified from Vulnerable to Endangered in 2022.

Cumulative impacts

The Mackenzie River Catchment has already lost approximately 73% of its pre-clearing vegetation cover⁸. Any further loss or disturbance to the remaining 27% is likely to cause significant additional impacts on threatened species and ecosystems.

Given this context, every hectare of remaining threatened species habitat is critical to protect. Dismissing further loss of threatened species and communities as “not significant” ignores clear ecological evidence and the precautionary principle.

We note that the Proponent considers that the loss of brigalow and poplar box TECs, and squatter pigeons is not significant, and that it is unlikely to have a significant impact on the ornamental snake⁵. The Proponent has, however, accepted that DCCEEW has considered that there is a likely significant impact on koalas and greater gliders.

⁶ [Middlemount Coal website. Southern Extension Project Preliminary Documentation \(EPBC 2021/8920\)](#)

⁷ [Middlemount Coal \(July 2025\) Attachment C: Commonwealth Threatened Species and Communities Assessment Report.](#)

⁸ [Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. \(2023\). Remnant Regional Ecosystem Vegetation in Queensland \(Version 13.0\), Analysis 1997-2021. Queensland Department of Environment and Science: Brisbane.](#)

Offsets

A new offset area is proposed, comprising approximately 1,554.7 ha—1,303.76 ha of woodland vegetation and 250.94 ha of regrowth or derived grassland. However, this proposal was not provided with the preliminary documentation, preventing proper assessment against the *EPBC Act Environmental Offsets Policy*⁹.

EnvA holds serious 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.¹⁰

Even the Federal Environment Minister acknowledged in 2023, “We know the current offset arrangements are broken and making nature worse.”¹¹

The Project will result in the loss and fragmentation of critical habitat for multiple endangered and vulnerable species in an already heavily disturbed bioregion. Given the cumulative ecological losses, poor precedent for long-term offset success, and lack of confidence in the offset 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 resource in relation large coal mining development

The Project involves diverting a section of Roper Creek around the proposed open-cut pit and realigning the southern flood levee and associated water storages. This section of Roper Creek supports high-quality riparian vegetation dominated by Queensland Blue Gum, including large old trees used by koalas and greater gliders.

Such diversions are likely to alter natural flow regimes, degrade riparian vegetation, increase erosion risk, and reduce habitat connectivity for dependent species.

The Independent Expert Scientific Committee (IESC) advice¹² identified that the potential impacts from this project are:

- reduction of riparian habitat and disruption of continuity of the riparian zone along several km of Roper Creek during and soon after its realignment, impacting arboreal and other species and affecting instream ecological processes,
- legacy of two residual voids (becoming increasingly saline) in a floodplain area,
- a potential decrease in surface water quality from controlled discharge and uncontrolled overflow events, for example overtopping of sediment dams releasing contaminated water and sediments downstream, and
- cumulative impacts to groundwaters and surface waters and their dependent ecosystems, including a loss of connectivity resulting in fragmentation of vegetation across the landscape.

The 2022 IESC advice also highlighted the deficiencies in the proposed project assessment and provided recommendations for further information to be provided.

It appears that the Proponent has not addressed any of the matters in the most recent IESC advice and relies only on the previous 2018 IESC advice¹³ in the addressing concerns within the preliminary documentation.

⁹ [EPBC Act Environmental Offsets Policy \(October 2012\)](#)

¹⁰ [Queensland Government \(2020\) State of the Environment Report – Biodiversity and Terrestrial Ecosystems](#)

¹¹ [The Guardian \(2024\) A third of land set aside for restoration in worse state than before, Australian offset audit finds](#)

¹² [IESC \(June 2022\) Advice to decision maker on Middlemount Southern Extension coal mining project](#)

¹³ [IESC \(September 2018\) Advice to decision maker on Middlemount Coal Mine Western Extension coal mining project](#)

Greenhouse gas emissions

There is no assessment of the greenhouse gas emissions from the proposed Project, despite the claims that the reporting of these emissions is an objective and commitment of the Proponent (section 8)¹.

EnvA estimates that extracting an additional 112 million tonnes of coal would produce approximately 36 million tonnes of carbon pollution. This is a significant contribution to national emissions and undermines the integrity of the Safeguard Mechanism and Australia's emission reduction targets.

The Proponent should be required to provide an independent assessment of carbon emissions, along with credible abatement and management measures.

We strongly recommend that the Proponent acknowledges the impact of these increased emissions on the environment and communities and provides detail on how these emissions will be reduced and managed.

For all the reasons outlined above, EnvA submits that the Project's environmental impacts are unacceptable and cannot be adequately mitigated or offset.

Thank you again for the opportunity to make comment on this Project.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland