

The Chief Executive

Department of Environment, Tourism, Science and Innovation

Attention: The EIS Coordinator (Yarrabee Coal Mine Continuation project)

By email: eis@detsi.qld.gov.au

8 January 2026

Dear Chief Executive

RE: Yarrabee Coal Mine Continuation Project – Draft Terms of Reference

Thank you for the opportunity to make a submission on the Draft Terms of Reference (**TOR**) for Yarrabee Coal Company Pty Ltd.'s (**the Proponent**) Yarrabee Coal Mine Continuation 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 considers that the approval of new coal projects, or the extension of existing projects:

- is inconsistent with achieving Australia's national emissions reduction targets and Queensland's legislated emissions reduction objectives;
- is likely to result in irreversible damage to local landscapes and leave communities exposed to the risk of stranded assets;
- will increase risks to local communities from extreme weather events, including more frequent and intense storms, floods, droughts and bushfires;
- will further damage significant coastal environments, including beaches and the Great Barrier Reef, through increased storm surge, runoff and coral bleaching; and
- will continue to degrade wildlife habitats of state and national significance through both direct habitat loss and climate change impacts.

Yarrabee Coal Mine Continuation Project

The Project proposes to extend the life of mining operations at the Yarrabee Coal Mine through the continued operation of an open-cut coal mine and associated infrastructure until approximately 2070. With an estimated commencement in 2028, the Project would involve the extraction of approximately 74 million tonnes of run-of-mine (**ROM**) coal over its life, at a maximum production rate of up to 4 million tonnes per annum (**Mtpa**), with an average rate of approximately 3.8 Mtpa.

The Project is located approximately 40 kilometres north-east of Blackwater and covers an area of approximately 2,296 hectares within existing mining leases ML 1770, ML 80049, ML 80050, ML 80096, ML 80104, ML 80172, ML 80195, ML 80196, ML 80197 and ML 80198.

The Proponent is seeking an amendment to the existing environmental authority (**EA**) EPML00844613. Continued operations would maintain the currently approved production rate



and be confined to the existing mining leases. ROM coal would be mined using existing mobile equipment and processed at the existing coal handling and preparation plant (**CHPP**).

The Proponent applied for a voluntary Environmental Impact Statement (EIS) assessment process, which was approved by the Department of the Environment, Tourism, Science and Innovation (**DETSI**) on 28 April 2025.

The Project has not been referred under the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**). As a result, the EIS will not assess impacts on potential controlling provisions under Part 3 of the EPBC Act, nor will it be conducted under the bilateral assessment agreement or another accredited joint assessment process.

The draft TOR for the EIS was released for public comment on 20 November 2025 and sets out the matters the Proponent must address in preparing the EIS.

EnvA's comments on the Draft TOR

EnvA is strongly opposed to the Project, which will result in further adverse environmental and social impacts, including habitat loss, irreversible land disturbance, impacts on the quality and quantity of surface waters within the largest Great Barrier Reef catchment, and the acceleration of climate change through additional greenhouse gas emissions.

EnvA is particularly concerned that the Initial Advice Statement for the Project clearly identifies the need for referral under the EPBC Act due to likely impacts on threatened species and ecological communities, as well as a water resource. In EnvA's view, the Project should be referred for assessment under the EPBC Act and assessed through a bilateral or otherwise accredited joint assessment process, rather than proceeding through a voluntary State-based EIS alone.

The current approach results in:

- duplication of effort for community members, government agencies and the Proponent in reviewing and responding to assessment documentation; and
- a “divide and conquer” approach that separates State and Commonwealth assessment processes.

EnvA has raised these concerns with DETSI but has not received an explanation as to why the Project is being assessed outside of an EPBC referral or decision. Any State approval of an amended EA risks placing undue pressure on subsequent Commonwealth decision-making, despite the Project's potential for significant impacts on matters of national environmental significance (MNES).

Notwithstanding the above concerns, EnvA acknowledges the level of detail included in the draft TOR. However, we recommend the following revisions to ensure the Project's impacts are adequately assessed.

Project description and alternatives (section 7)

The draft TOR requires justification of various methodologies, yet Section 7.3(e) appears to be the only provision that allows the Proponent to explain the Project's development, purpose and need.

Both Queensland and Commonwealth environmental assessment frameworks purport to assess whether projects “stack up” by weighing social and environmental risks against economic benefits. However, all coal projects result in direct environmental impacts, including land clearing, altered hydrology, impacts on surface and groundwater quality and quantity, and air quality degradation. Indirect impacts arise from greenhouse gas emissions that contribute significantly to climate change.

Climate change is already having profound impacts on ecosystems, species and communities, driven by more frequent and severe extreme weather events. The proposed extension of mining operations until 2070 significantly increases the Project's long-term contribution to these impacts.

As the global energy system transitions away from fossil fuels, the economic benefits of coal are expected to decline, increasing the risk of early closure, care-and-maintenance arrangements and stranded assets.

While EnvA notes Section 7.13 of the draft TOR, we strongly recommend that the TOR require a genuine triple-bottom-line assessment. This should include a transparent and quantitative analysis of future coal demand, economic benefits, and the full environmental and social costs of the Project, rather than relying on unsubstantiated claims regarding ongoing demand for coal.

Environmental impact assessment process (section 8)

EnvA is deeply concerned about the cumulative impacts of land clearing and climate change associated with the expansion and continuation of coal mining in Central Queensland. EnvA has reviewed numerous coal projects in the region, many of which affect the same threatened species and ecosystems.

Several species, including the koala and greater glider, have experienced significant population declines and have recently been reclassified from vulnerable to endangered in Queensland. Despite this, cumulative impacts are often inadequately assessed.

Although the draft TOR requires consideration of cumulative impacts on environmental values, it provides little guidance on appropriate methodologies or on how the significance of cumulative impacts should be assessed.

The State of the Environment Report¹ and the Australian Government's commitment to prevent further extinctions under the Threatened Species Action Plan 2022–2032² underscore the need for rigorous assessment of direct, indirect and cumulative impacts from new and continuing coal projects.

There is substantial evidence³ that climate change poses a major threat to a large proportion of listed threatened species and ecological communities. A Project producing up to 74 million tonnes of ROM coal over approximately 42 years will make a significant contribution to greenhouse gas emissions and associated climate impacts.

EnvA recommends that the TOR include stronger and more explicit direction on the measurement and assessment of cumulative impacts, including impacts on:

- threatened species and ecological communities at sub-catchment, catchment, State and national scales;
- water quality entering the Great Barrier Reef at a catchment scale;
- water availability and use under changing climatic conditions; and
- greenhouse gas emissions affecting matters of State and national environmental significance.

Thank you again for the opportunity to make comment on the Draft Terms of Reference for the Yarrabee Coal Mine Continuation Project.

¹ [DCCEEW \(2021\) Australia State of the Environment](#)

² [DCCEEW \(2022\) The Threatened Species Action Plan 2022-2032](#)

³ [Living Wonders. Explore the Evidence](#)

Kind regards

A handwritten signature in blue ink, appearing to read 'Coral Rowston', written in a cursive style.

Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland