Hon Murray Watt MP
Minister for the Environment and Water
c/- Department of Climate Change, Energy, the Environment and Water

Submitted via the EPBC portal

11 February 2026

Dear Minister,

RE: Submission on Referral – Hail Creek Open Cut – Eastern Margin Extension (EPBC 2025/10403)

Thank you for the opportunity to make this submission in response to the referral of the Hail Creek Open Cut – Eastern Margin Extension (**Project**) by Hail Creek Holdings Pty Ltd, a subsidiary of Glencore Coal Assets Australia Pty Ltd (**Proponent**), under the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**).

Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (**EnvA**) is a Central Queensland community 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 Project

The Proponent is proposing to extend the existing Kemmis, Carrrinyah and Exevale Pits and develop a new Homevale Pit, including a permanent watercourse diversion for a section of Hail Creek at the current Hail Creek Open Cut coal mine (**HCOC**). The proposed project, if approved, will:

- Expand the mine's footprint by approximately 680 ha;
- Extend the life of the mine by three years until 2038, and
- Increase production over the life of the mine by 24Mt of ROM coal including 16.6Mt of coking coal and 7.4Mt of thermal coal while not increasing the existing authorised annual tonnage of 20 MTPA.

The Project Area is approximately 680 ha on mining leases (**ML**) ML4738 and ML700026, located approximately 85km north-west of Mackay and 35km north-west of Dysart in Central Queensland.

ENVA'S SUBMISSION

1. EnvA recommends that the Minister decides that this project will have **clearly unacceptable impacts on protected matters**, most notably the direct impact on:

   (a) Listed threatened species and communities (ss 18 and 18A),

   (b) Listed migratory species (ss 20 and 20A), and

   (c) Water resources (ss 24D and 24E).

2. In the alternative, EnvA recommends that this Project is considered a controlled action due to significant residual impacts on the Matters of National Environmental Significance (**MNES**) listed above.

3. Given the terrestrial surveys were conducted over ten years ago, EnvA strongly recommends that this Project be assessed through an Environmental Impact Statement to provide a thorough, contemporary and legally robust assessment of the potential impacts of the Project.

4. Due to the significant impacts on water resources and the increased greenhouse gas emissions which will further impact on MNES, EnvA further recommends that the following controlling provisions are applied to this Project:

   (a) World Heritage (ss 12 and 15A),

   (b) Commonwealth marine areas (ss 23 and 24A),

   (c) Great Barrier Reef Marine Park (ss 24B and 24C), and potentially

   (d) National Heritage (ss 15B and 15C),

Further background and detail to our submission is provided below.

GROUNDS FOR SUBMISSION

Significant impact on threatened species and communities and migratory species

The Project will have a significant adverse impact on numerous threatened species, ecological communities and migratory species listed under the EPBC Act. The project footprint is approximately 679.2ha of which nearly 600ha is remnant vegetation. [1]

EnvA notes that the referral documentation presents a refined project area to that provided in the Proponent's application for a major amendment to their Queensland Environmental Authority[2].

Along with a desktop survey, the Proponent conducted 60 field days between February 2012 and February 2015. No detail is provided regarding the seasonal timing, survey effort per habitat type, or detection methods applied during these surveys. Given that the surveys were over ten years ago — prior to the re-listing of the koala and greater glider as endangered — they cannot be relied upon to accurately characterise current population density, habitat use, or conservation significance, or rule out the likelihood of significant impacts.

From these surveys, the Proponent has identified numerous MNES threatened species, communities and migratory species which will, or are likely, to be impacted by the Project:

[1] Attachment F1. Hail Creek Open Cut Eastern Margin Extension – Ecological Impact Assessment (17 December 2025)
[2] EnvA (June 2025) Submission on the application for a major amendment to Environmental Authority (EPML00661913) relating to an extension of the Hail Creek Open Cut coal mine (Application: A-EA-AMD-100576264)

Threatened ecological communities (**TEC**)

- 4ha of semi-evergreen vine thickets (**SEVT**) of the Brigalow Belt

Threatened species

- 595.8ha of squatter pigeon habitat (*Geophaps scripta scripta*: vulnerable)
- 595.8ha of koala habitat (*Phascolarctos cinereus*: endangered)
- 5.7ha of greater glider habitat (*Petauroides volans*: endangered)
- 83.5ha of ornamental snake habitat (*Denisonia maculata*: vulnerable)
- 4ha of black ironbox (*Eucalyptus raveretiana*: vulnerable).

Migratory species

- White-throated needletail (*Hirundapus caudacutus*: vulnerable)

The Proponent concedes that there will be significant residual impacts on koalas and squatter pigeons, and will clear high-quality habitat for greater gliders and ornamental snakes, black ironbox, and the SEVT TEC. There may also be impacts to the white-throated needletail – despite the claims that the impact area does not include breeding habitat - only foraging habitat.

The northern Bowen Basin region has already been extensively cleared for mining and agriculture. Continued fragmentation of remnant vegetation places remaining species and ecosystems at increasing risk. The HCOC has previously cleared thousands of hectares for its operations, as have neighbouring coal mines. The proposed clearing for this Project cannot be assessed in isolation.

Habitat loss and fragmentation are key drivers of species decline and extinction. The recent reclassification of the koala and greater glider as 'endangered' underscores the urgency of considering cumulative impacts in decision-making. The Koala Recovery Plan[3] and draft Greater Glider Recovery Plan[4] both clearly identify habitat loss and fragmentation, and climate change as key threatening processes.

The Project will also remove koala and greater glider habitat that intersects with a Statewide Biodiversity Corridor, which connects to Homevale National Park. While the Proponent acknowledges the loss of 599.8ha of connectivity habitat, the proponent notes that their Haul Road already restricts connectivity, and that any connectivity restriction will be "temporary" until rehabilitation of the Project is completed in around 20 years' time. EnvA considers that this is an unacceptable loss of important habitat and functional connectivity for endangered species. Loss of connectivity for a period of up to 20 years cannot reasonably be characterised as "temporary", particularly where rehabilitation outcomes are uncertain and final voids will remain.

EnvA is of the strongest view that this Project must be refused on the basis of the unacceptable impacts to threatened species in both the direct impacts from the loss of habitat and the cumulative impacts of the continuing approval of new and expanding coal mines that not only destroy habitat forever but also contribute to the impacts of climate change on threatened species.

At a minimum, the fauna surveys need to be re-visited to accurately record the species and habitat proposed to be cleared. Due to the significant loss of habitat in the region and catchment, there is a reasonable chance that the remaining habitat in the northern Bowen Basin (including the Project area) will have changed significantly since the Proponent's surveys were conducted. This is supported by recent drone surveys conducted by Lock the Gate which identified 13 koalas in just

[3] Australian Government (2022) National Recovery Plan for the Koala Phascolarctos cinereus (combined populations of Queensland, New South Wales and the Australian Capital Territory)

[4] Australian Government (2025) Draft National Recovery Plan for greater gliders

one night of survey work focussed on approximately 160ha in the north-east of the Project area[5], which is far more detailed than the dated field surveys presented by the Proponent and confirms the likelihood that this koala population is of national significance.[6]

Rehabilitation

Very little information has been provided about rehabilitation of the Project, despite its importance in mitigating long-term environmental impacts, particularly on water resources and terrestrial ecosystems.

A Progressive Rehabilitation and Closure Plan (PRCP) has not been made available for review, despite being a requirement for new EA applications. While not currently required for expansion projects, this is a regulatory gap that should be urgently addressed through amendment of the *Environmental Protection Act 1994*.

It remains unclear how many final voids the Project will create or extend. At least one additional void will be created in the Homevale Pit. Three of the four final voids associated with the Project are proposed to be left unfilled, with the Proponent citing economic infeasibility—yet no economic assessment has been provided to support this claim or justify leaving permanent voids in situ.

This also raises questions as to the validity of the Proponent's claims of "temporary" impacts to habitat and connectivity – habitat restoration to achieve the status of important or critical habitat takes many years and the EnvA considers that this loss of habitat and connectivity will result in significant and irreversible impacts on threatened species and communities.

Offsets

The Proponent considers that MNES offsets will only be required for the koala and squatter pigeon. It is EnvA's view that offsets must be required for all impacts on MNES to ensure there is a measurable conservation gain as required under the EPBC Act Offsets Policy. The permanent loss of threatened species habitat from this project must be considered significant as the cumulative loss is leading to the further decline of their conservation status.

The Proponent is "investigating" the suitability of an adjacent piece of land (Lot 13 on WHS466) to cover 90% of the offset requirements with remaining offsets to be addressed through a financial settlement. This proposed offset is poorly defined, and it is unclear whether this potential offset can realistically provide additional habitat for all the threatened species and communities that will be impacted. To the contrary, the initial assessments undertaken in November 2023 recorded multiple koala and squatter pigeon sightings in the 'potential' offset area. It is not reasonable to assume that the area could support additional individuals or provide a net-gain in habitat for any impacted species or communities.

The concept that payment into an offset fund where the proponent cannot secure a suitable offset is contrary to the intent of the EPBC Act and the Offsets Policy.

It must be the proponent's responsibility to ensure that offsets:

- are relevant and available to compensate for the impact to the protected matter and support recovery or conservation,
- result in a measurable improvement from the baseline at the time the relevant decision is made under the Act for protected matters, and
- provide certainty that protected matters will be protected and enhanced.

[5] Lock the Gate (2025) Hail Creek Mine Extension, June 2025: Koala survey

[6] Lock the Gate (2025) Australia's icon in the hands of Murray Watt: 'Nationally significant koala population found at proposed Hail Creek coal mine extension.

Damage and destruction of MNES should not be for sale — offsets must deliver real, additional, and enduring conservation outcomes. If the proponent is unable to secure an appropriate land-based offset, it is highly likely that the offset fund-holder will not be able to secure a suitable offset to secure the conservation status of the species.

Further to this, there is a lack of suitable land suitable for offsetting the impacts of development[7], particularly in the Brigalow Belt bioregion which has been, and continues to be, extensively cleared for agriculture and coal mines[8].

The Proponent relies heavily on biodiversity offsets to justify significant residual impacts. However, offsets cannot adequately replace habitat critical to the survival of endangered and vulnerable species such as the koala, greater glider, squatter pigeon, and ornamental snake.

EnvA also has serious concerns about the overall effectiveness of biodiversity offsets. Since the introduction of the Queensland Environmental Offsets Policy in 2014, biodiversity indicators—including vegetation extent and condition, and numbers of listed threatened species and ecological communities—have all continued to decline.

Water Resources

The Project will cause further permanent changes to hydrology, including a diversion of 1.5km of Hail Creek and the construction of additional levees and drains to protect pits and final voids from water ingress.[9] Although final void arrangements are not clearly described, at least three permanent voids will result from the expansion. The Project will also extend current impacts on water resources, including water take and discharges, for an additional four years.

The Proponent indicates that there will be water discharges from the HCOC mine and the Project from 500 to 2,000 ML/year for the duration of mining activities. However, these estimates appear inconsistent with recent data. In early 2025, HCOC reported water releases over just eight days from two release points (**RP**) [10]:

- 6-7 February 2025: 15,499 l/s from RP1, and 3070 l/s from RP7, and
- 31 March – 5 April 2025: 3070 l/s from RP1, and 16,160 l/s from RP7.

Although the Proponent reported that salinity levels were compliant with their EA, these discharge volumes suggest the operation is near the threshold of non-compliance, particularly during high rainfall events. This raises concerns about the reliability of the Proponent's discharge estimates and the adequacy of current water management systems.

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

Hail Creek diversion

EnvA notes that DETSI requested further detail in relation to the extent of erosion and scouring in the Hail Creek diversion, and the four additional drainage features that are required to prevent ingress of surface waters to pits.

While the Proponent responded, they did not demonstrate compliance with the Australian Coal

[7] Queensland Government. In-demand offsets
[8] Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. (2023). Remnant Regional Ecosystem Vegetation
[9] Hail Creek Open Cut Eastern Margin Extension – Surface Water Assessment (12 November 2025)
[10] Fitzroy Basin coal mine water releases

Industry's Research Program (ACARP) guidelines[11]. Instead, the response stated that: "exceedances are generally confined to localised locations and average values for bed shear stress, stream power, and velocity along the proposed drainage features are generally below the ACARP Guideline criteria."

Use of the term "generally" does not meet the standard expected under the precautionary principle. These diversions, which will become permanent hydrological features of the sub-catchment, must be designed to be self-sustaining in perpetuity. Available analysis shows that erosion and scouring are likely to occur over time, resulting in ongoing degradation—including the release of fine sediment into the downstream catchment and the Great Barrier Reef.

We recommend that the Hail Creek diversion not be approved. Instead, all mine pits should be fully backfilled and rehabilitated to support the development of a stable post-mining landform.

Brumby Waterhole

Brumby Waterhole is a permanent surface water feature located on a tributary of Hail Creek, approximately 1.2 km from the Exevale pit. It holds significant cultural value for the Widi Traditional Owners. Proposed new mining areas—including the Homevale Pit and the northern extension of the Exevale Pit—are situated within 500 m of the waterhole.

The Proponent commissioned additional groundwater assessment modelling for the Brumby Waterhole.[12] The conclusion was again that the Brumby Waterhole is a surface water–fed feature and not reliant on groundwater. Based on this, the report suggests the mine is unlikely to affect water levels in the waterhole. However, the consultant also noted that "confidence in the outcomes will require continued and regular monitoring of the pools for both elevations and water quality."

Further uncertainty arises from statements in the Proponent's own documents acknowledging groundwater drawdown in the area, while asserting that this will not impact surrounding vegetation.

Specifically, the Proponent argues that "…the dominant species (*Eucalyptus tereticornis, E. raveretiana and Lagunaria queenslandica*) are found throughout the local area in areas where surface water is not retained…"

This claim is unsubstantiated and internally inconsistent with the Proponent's own acknowledgement of groundwater drawdown in the area. If these species are present in areas lacking surface water, it may indicate a dependence on shallow groundwater. In such cases, even a modest drawdown could affect vegetation health, contrary to the Proponent's assertion.[13]

Black ironbox

Black ironbox, *Eucalyptus raveretiana,* has a limited distribution and is confined to riparian areas in Central Queensland. It is listed as vulnerable under both the EP Act and EPBC Act.

The Project will clear 0.5 ha of this species with a further habitat likely to be impacted by changes to hydrology and groundwater within the 'offset area'.

The Proponent's assertion that a 5–10% permanent reduction in catchment area and corresponding reduction in flows will not harm the offset population is questionable. Given that these offset areas have already experienced cumulative disturbance, further hydrological changes are highly likely to pose serious risks to the viability of the species.

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[11] ACARP (2002) *Bowen Basin River Diversions Design and Rehabilitation Criteria*.

[12] Attachment G2: Hail Creek Open Cut Eastern Margin Extension – Brumby Water Holes Groundwater Model Update (2025)

[13] Attachment F1: Hail Creek Coking Coal Eastern Margin Extension – Ecological Impact Assessment (17 December 2025)

Groundwater dependent ecosystems (GDEs)

The Terrestrial and Aquatic Groundwater Dependent Ecosystems Assessment report[14] defines approximately 128.45 ha or facultative terrestrial GDEs within the Hail Creek mine area. These ecosystems can access shallow groundwater when available but can persist without it.

However, the conclusion that mine-induced changes to groundwater will not affect GDEs overlooks the likelihood that ecosystem health and productivity could decline in the absence of groundwater access - particularly as climate change alters rainfall patterns. Groundwater may become an increasingly critical water source for these ecosystems in the future.

In this context, the precautionary principle should apply. Many of these ecosystems support species of high conservation value, including the endangered koala and greater glider. Protecting habitat quality is essential for the integrity of the broader Statewide Biodiversity Corridor.

This is especially important when considered alongside:

- The cumulative impacts of coal mining on the Fitzroy Basin's waterways, and
- The escalating uncertainty about how climate change will affect regional water resources.

Greenhouse Gas (GHG) emissions

Scope 1 emissions (Fugitive emissions)

The coal seams at the HCOC have been shown to contain very high levels of methane, a potent and fast-acting greenhouse gas, which has a global warming potential approximately 82 times more than carbon dioxide over 20 years. Historically, the HCOC has been described as a 'super emitter' of methane gas with the Proponent under-reporting its methane pollution by up to eight times.[15]

EnvA notes that the Proponent has now commenced reporting under Method 2 from the National Greenhouse and Energy Reporting (**NGER**) measurement determination which is reflected in the fugitive emissions reported for the HCOC under the Safeguard Mechanism. There was a significant increase in reported emissions from 532,466 tonnes CO_2-e in 2022/23 up to 1,381,195 tonnes CO_2-e in 2023/24. Despite the 'improved' reporting of fugitive emissions, there remain concerns that method 2 is out of date and may be underestimate emissions.[16]

Research using satellite measurements of methane emissions concluded that HCOC was a super emitting coal mine, estimated to emit 20% of Australia's methane emissions from coal mining while accounting for only 1% of national coal production.[17]

Australia is a signatory to the global methane pledge – a commitment from over 120 countries committed to collectively reduce methane emissions by at least 30% below 2022 levels by 2030.[18] Australia could fulfill its obligations to the global methane reduction goal by not approving new or expanding coal mines – if new Projects are approved, Australia's annual coal mine methane emissions would increase by 50% by 2030.

The approval of an extension to the HCOC, a super methane emitting coal mine, is contrary to meeting emission reductions and Australia's commitment to the methane pledge.

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[14] Hail Creek Open Cut Eastern Margin Extension – Terrestrial and Aquatic Groundwater Dependent Ecosystems Assessment (29 April 2025)

[15] University of New South Wales (2025) Coal mine methane emissions much higher than previously reported: study

[16] Climate Change Authority (2023). Review of the National Greenhouse and Energy Reporting legislation.

[17] Sadavarte, P. *et al* (2021) Methane Emissions from Super emitting Coal Mines in Australia Quantified Using TROPOMI Satellite Observations. Environmental Science and Technology Vol55/Issue 24)

[18] Australian Government (2022) Australia joins Global Methane Pledge.

The Proponent's GHG documentation deficiencies

The greenhouse gas emission report[19] estimates that the Project will contribute an additional 3.21 Mt CO_2-e (Scope 1 and 2 emissions) and 64.83 Mt CO_2-e Scope 3 emissions over the LOM. While the emission sources and the methods used to calculate the GHG emissions from these sources, there is no specific information provided as to the contribution of these sources into the estimates.

The Proponent claims commitments to responsibly manage the decline of its thermal coal portfolio and has established emission reduction targets including emission reduction targets of 15% by 2026, 25% by 2030 and 50% by the end of 2035 (against a 2019 baseline). This project is contrary to the Proponent's commitments to reduce thermal coal production with nearly half of the coal to be extracted from the Project identified as thermal coal.

There are no mitigation or management measures documented to assess if the project meets the requirements of the Safeguard Mechanism. The Proponent further acknowledges that there is no GHG management or abatement plan currently in place.

Climate context

The scientific consensus is unequivocal: expansion of fossil fuel production is incompatible with limiting global warming to safe levels.[20] 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.[21] Meeting these targets requires the rapid phase-out and non-expansion of 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 remain within carbon budgets compatible with 1.5°C or 2°C pathways.[22]

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, and
- A decrease in the conservation status of threatened species and ecosystems.

Extending the super-polluting HCOC appears to be contrary to Proponent's commitment to reducing its thermal coal portfolio and reducing emission targets and will only lead to the amplifying the impacts of climate change on MNES and Australian communities.

Great Barrier Reef

Two of the greatest threats to the Great Barrier Reef (**GBR**) are climate change and declining water quality.[23]

The proposed Project will significantly add to these threats due to:

- Already classified as a super GHG emission project adding fuel to the heating climate, and
- Significant disturbance to waterways combined with discharging coal mine affected water into the GBR catchment.

[19] Attachment C. Hail Creek Open Cut Eastern Margin Extension – Greenhouse Gas Assessment (10 December 2025)

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

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

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

[23] Great Barrier Reef Marine Park Authority. Threats to the Reef.

The recent amendments to the EPBC Act remove the exemption for land clearing where the action involves:

- Clearing native vegetation within 50 metres of a watercourse, wetland or drainage line in the catchment of the Great Barrier Reef Marine Park.
- Clearing vegetation on land that has not been cleared at least 15 years prior to the time the action is taken (and the action is not a forestry operation).

While this does not mean there is a blanket ban on the clearing of regrowth vegetation of clearing within 50m of a watercourse, it does indicate that there may be significant impacts to the GBR from such activities. This project will not only clear riparian vegetation but will also realign waterways and release polluted coal mine water into the GBR catchment.

EnvA considers that this must be further addressed by the Proponent through the inclusion of controlling provisions:

(a) World Heritage (ss 12 and 15A),

(c) Commonwealth marine areas (ss 23 and 24A), and

(d) Great Barrier Reef Marine Park (ss 24B and 24C).

There is a precedent in including these controlling provisions from the Blackwater North decision in relation to controlling actions. This Project presents a very strong case for the inclusion of these controlling provisions.[24]

National Heritage

Homevale National Park (**HNP**) is located immediately east of the Project. While this national park is not identified as a National Heritage site on Australia's National Heritage list, it is a natural, historic and an indigenous place of outstanding significance to the country – and hence should be considered for inclusion on the National Heritage list. HNP features "Dramatic cliffs, peaks and spires punctuate views of a vast dry landscape formed millions of years ago. The park protects open woodland, brigalow and key fossil locations."[25]

Section 7.4.5 of the Terrestrial Ecology Report[26] claims that there will be no direct impact on the values of HNP, but indirect impacts could include:

- Waste rock emplacement immediately adjacent HNP,
- Dust, noise and light from operations,
- Vegetation clearing adjacent to the national park which will increase edge effects,
- Reduce the natural or cultural values of part of HNP in a small area where the Project Area abuts the western boundary of HNP, and
- Residual impacts of weed infestation into the HNP.

EnvA acknowledges that HNP is currently not listed on the National Heritage list, it is critical that this national park be protected from the impacts of this Project.

Further information on the impacts on the Homevale National Park and detail of the appropriate offsets on this protected area must be provided. The costs of additional management actions should not be deflected to the State government or community.

[24] DCCEEW (13 May 2024) Statement of Reasons for a Decision on Controlled Action Under the *Environment Protection and Biodiversity Conservation Act 1999*

[25] Queensland Government. Homevale National Park

[26] Appendix G: Hail Creek Transition Project – Terrestrial Ecology Assessment Report (EcoSM, 2015)

EnvA reiterates its recommendations that:

1. The Minister decides that this project will have **clearly unacceptable impacts on protected matters**, most notably the direct impact on:
   (a) Listed threatened species and communities (ss 18 and 18A),
   (b) Listed migratory species (ss 20 and 20A), and
   (c) Water resources (ss 24D and 24E).
2. In the alternative, EnvA recommends that this Project is considered a controlled action due to significant residual impacts on MNES and that this Project be assessed through an Environmental Impact Statement process to provide a thorough comprehensive and up to date assessment of the likely environmental impacts.
3. Due to the significant impacts on water resources and the increased greenhouse gas emissions which will further impact on MNES, EnvA further recommends that the following controlling provisions are applied to this Project:
   (a) World Heritage (ss 12 and 15A),
   (b) Commonwealth marine areas (ss 23 and 24A),
   (c) Great Barrier Reef Marine Park (ss 24B and 24C), and potentially
   (d) National Heritage (ss 15B and 15C),

Thank you again for the opportunity to make comments on the Hail Creek Open Cut coal mine - Eastern Margin Extension Project.

Yours sincerely,

Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland