

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

5 March 2026

Dear Minister,

**RE: Submission on Referral: Daunia Coal Mine – West Infrastructure Project (EPBC 2026/10427)**

Thank you for the opportunity to make this submission in response to the referral of the Daunia Coal Mine – West Infrastructure Project (**Project**) by Whitehaven Daunia Pty Ltd., a wholly owned subsidiary of Whitehaven Coal Limited (**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 proposes to construct an out-of-pit spoil dump, haul roads, and two surface water dams to support ongoing operations within the Daunia Coal Mine Project (DCMP), located on Mining Leases ML1781, ML70115 and ML70116.

The Project would facilitate continued run-of-mine (ROM) coal production of up to 6.5 Mt per annum until approximately 2040.

The Project Area comprises approximately 502 hectares within EPC27334 and EPC1951, for which Mining Lease Application ML700085 has been submitted. The disturbance footprint is approximately 386 hectares, including 61 hectares within the existing authorised ML1781 and a further 325 hectares of new disturbance.



## ENVA'S SUBMISSION

EnvA submits that the Project:

1. Is likely to have significant impacts on Matters of National Environmental Significance (MNES), including:
  - Listed threatened species and ecological communities (ss 18 & 18A EPBC Act); and
  - Water resources (ss 24D & 24E EPBC Act).
2. Will result in clearly unacceptable impacts when considered in light of:
  - The scale of habitat loss,
  - Existing cumulative impacts in the northern Bowen Basin, and
  - The increasing risks associated with climate change.
3. Must, at a minimum, be determined to be a controlled action and assessed by way of a comprehensive Environmental Impact Statement (EIS).

## GROUNDS FOR SUBMISSION

### Threatened species and communities

The Proponent conducted 16 field survey days across five survey periods between April 2021 and September 2025. However, surveys were constrained by weather and access limitations, resulting in reduced survey effort.<sup>1</sup>

The Proponent acknowledges that non-detection does not equate to absence.

EnvA submits that incomplete survey effort creates material uncertainty regarding:

- The presence and extent of MNES habitat,
- The population status of listed species within the Project Area, and
- The adequacy of impact assessment.

Under the precautionary principle (s 391 EPBC Act), this uncertainty must weigh against approval. Further field surveys are required in areas where access was limited, or survey effort does not meet government standards.

#### Ornamental snake (*Denisonia maculata*)

Reported as having a high likelihood of disturbance including the loss of 23.66 ha of breeding and foraging habitat and 48.7 ha of dispersal habitat. The Proponent concludes that the Project is likely to have a significant impact on this species (Table 7-2).<sup>1</sup> This admission alone supports a controlled action determination under ss 18 and 18A.

#### Squatter pigeon (southern) (*Geophaps scripta scripta*)

Despite acknowledging the loss of over 90 hectares of breeding and foraging habitat, the Proponent concludes that impacts are unlikely to be significant. EnvA submits that this conclusion is inconsistent with the Significant Impact Guidelines 1.1<sup>2</sup>, particularly in relation to:

- Reduction in area of occupancy;
- Fragmentation of an already fragmented population; and
- Degradation of critical breeding habitat.

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<sup>1</sup> [STR \(November 2025\) Whitehaven Coal Limited: Terrestrial Ecology Assessment Report](#)

<sup>2</sup> [DCCEEW \(2021\) Significant Impact Guidelines 1.1 - Matters of National Environmental Significance](#)

### Koala (*Phascolarctos cinereus*)

The koala was uplisted to Endangered in Queensland, NSW and ACT in 2022 due to habitat loss, fragmentation, disease and climate change. Continued incremental clearing in heavily mined regions such as the northern Bowen Basin contributes to cumulative decline.

Even relatively small areas of habitat loss are significant in a landscape already extensively cleared.

### Brigalow (*Acacia harpophylla* dominant and co-dominant) TEC

The Proponent considers that the Project is unlikely to have a significant impact on the Brigalow TEC as no clearing will occur outside the Project. The recent clearing of Brigalow regrowth by the landholder prior to the referral of the Project raises concerns regarding pre-emptive habitat removal.

While there may not be direct disturbance of the Brigalow TEC from the project, indirect impacts including edge effects, hydrological change, dust deposition and altered fire regimes must be assessed.

### Cumulative impacts

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 DCMP 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 as 'endangered' underscores the urgency of considering cumulative impacts in decision-making. The Koala Recovery Plan<sup>3</sup> clearly identifies habitat loss and fragmentation, and climate change as key threatening processes.

## **Water Resources**

The Project is located within the Isaac sub-catchment of the greater Fitzroy Basin. The Isaac River is the main watercourse in the vicinity of the Project area and flows in a south easterly direction to the southwest of the Project. The Project will drain into the Isaac River approximately 6 km downstream from the Project.<sup>4</sup>

### Surface water

The Project proposes to increase the water storages from 12 to 16 (Table 5.1).<sup>4</sup> Some of these will be rehabilitated, but four voids covering over 256 ha are proposed to be left in situ as a permanent scar on the landscape and which may significantly impact on water quality of the Fitzroy Basin catchment when management and monitoring is completed at the end of the mine rehabilitation.

The current and proposed mine water infrastructure does not propose any new release points, with Dam 2 remaining as the only designated release discharge point (RP1). Controlled water release would only be undertaken when the total site capacity has been exceeded and in wet, very wet and extreme wet conditions. However, the Proponent also indicates that the water balance modelling indicates that there is a similar potential for uncontrolled water discharges in wet conditions.

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<sup>3</sup> [Australian Government \(2022\) National Recovery Plan for the Koala \*Phascolarctos cinereus\* \(combined populations of Queensland, New South Wales and the Australian Capital Territory\)](#)

<sup>4</sup> [WRM \(17 November 2025\) Daunia West Infrastructure Project. Surface Water Assessment](#)

An updated Water Management Plan (WMP) will be developed which will provide details of water management policies and procedures. The objectives of WMP will be consistent with the DCMP WMP including:

- Prevent the release of contaminants into the receiving environment, and
- Ensure water resource use does not negatively affect the local and regional environment.

EnvA notes that, despite the objectives, the DCMP continues to release contaminated coal mine water into the Isaac River. Records show that the mine released water from RP1 at DCMP over the last year were between:

- 31 March and 9 April 2025, and
- 12 January and 21 January 2026.

These were relatively long duration water releases which released large volumes of highly polluted water. As examples, these are the reports from the first day of each of these releases. The same volumes and salinity were reported on the last day of the release.

Daunia mine, BHP Coal		Daunia mine, Whitehaven Daunia Pty Ltd	
<b>RP1 release point</b>		<b>RP1 release point</b>	
Release start	31 Mar 2025	Release start	12 Jan 2026
Notified as compliant?	Yes	Notified as compliant?	Yes
Environmental Authority	EPML00561913	Environmental Authority	EPML00561913
Releasing flow rate	400L/s	Releasing flow rate	633L/s
Releasing salinity	2260µS/cm	Releasing salinity	1430µS/cm
Receiving waters	Isaac River via New Chum Creek	Receiving waters	Isaac River via New Chum Creek
Receiving waters flow rate	125m3/s	Receiving waters flow rate	1838m3/s
Receiving waters salinity	285µS/cm	Receiving waters salinity	135µS/cm

DCMP contributes to Fitzroy Region REMP along with other coal mines that release into the Isaac catchment. The latest report for the Upper Isaac catchment revealed that the conductivity of water was high, metal levels were high, habitat quality was low and the macroinvertebrate levels were extremely low.<sup>5</sup>

The Proponent considers that its contribution to the cumulative impacts to water quality is negligible and that a detailed cumulative impact assessment, including sediment and water releases from other mining operations in the Upper Isaac River catchment, is not considered necessary.

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 current 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.

<sup>5</sup> [Fitzroy Partnership for River Health \(2025\). Fitzroy Basin Report Card July 2024 – June 2025](#)

### Groundwater dependent ecosystems (GDEs)

The Proponent identifies potential impacts on ground water resources through:

- Changes to shallow ground water through increasing recharge,
- Impacts on private water supply bores,
- Groundwater dependent ecosystems,
- Groundwater quality, and
- Final void lakes.<sup>6</sup>

The Proponent has acknowledged that water resources in relation to a large coal mining development or coal seam gas will have impacts on the environment.<sup>7</sup>

### **Recommendation**

EnvA submits that the Project should be refused on the basis that:

- It will cause significant impacts to listed threatened species and ecological communities;
- It will exacerbate cumulative biodiversity decline in an already heavily disturbed region;
- It presents unacceptable risks to surface water and groundwater resources; and
- It contributes to long-term degradation of the Fitzroy Basin and downstream environments.

At a minimum, the Project must be determined to be a controlled action and assessed through a comprehensive EIS to properly evaluate biodiversity, hydrological and cumulative impacts.

Thank you again for the opportunity to make comments on the Daunia Coal Mine – West Infrastructure Project.

Yours sincerely,



**Dr Coral Rowston**

Director

Environmental Advocacy in Central Queensland

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<sup>6</sup> [SLR \(1 December 2025\). Daunia West Infrastructure Project. Groundwater Impact Assessment](#)

<sup>7</sup> [Whitehaven Daunia \(2026\) Referral application](#)