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RE: Submission Application for New Environmental Authority – Saraji East (A-EA-NEW-100986365) and Mining Lease MLA70383

Thank you for the opportunity to make this submission in response to the proposed Environmental Authority – Saraji East (A-EA-NEW-100986365) and Mining Lease application MLA70383 (**the Project**), submitted by BMA Alliance Coal Operations Pty Ltd (**the Proponent**).

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 seeking approval to develop the Project involving a single-seam underground mine and supporting infrastructure on existing Mining Leases (ML) 1775, ML70142 and ML1782, and Mining Lease Application (**MLA**) 70383 and MLA 70459 adjacent to, and accessed through, the existing open cut mine void within Mining Lease (**ML**) 1775.

The Project would be located approximately 30km north of Dysart and 170 km south-west of Mackay in Central Queensland.

The proposed project, if approved, will involve:

- a new Coal Handling and Processing Plant (CHPP),
- a Mine Industrial Area (MIA),



- a conveyor system, stockpiles, rail spur and balloon loop, water pipelines and dams, powerlines, incidental mine gas (IMG) management, supporting transport and infrastructure corridor, and
- construction accommodation village; to be developed on MLA 70383, MLA 70459 or co-located on the adjacent Saraji Mine tenure (ML 70142, ML 1775 and ML1782).

The proposed disturbance area (Project footprint) is 3,348 ha including direct impacts to 1,294.5 ha of land.

ENVA'S SUBMISSION – RECOMMENDATIONS

That the proposed Environmental Authority – Saraji East (A-EA-NEW-100986365) and Mining Lease application MLA70383 be refused as they are not adequately justified and are not aligned with the protection of threatened species and communities, water resources, the general environment and are contrary to human rights.

Further background to our submission is provided below.

GROUNDINGS FOR SUBMISSION

Issues with the EIS documentation

EnvA considers that the EIA documentation presented for the Project limits the ability to accurately respond to the invitation for public comment. In general, our concerns are:

- the information being presented and fragmented across over 50 separate documents,
- there are material inconsistencies in the information provided between the documents,
- the application provided dates back 2013¹ and does not reflect accurate information. For example, the application notes that the Project has not been referred for EPBC Act assessment. However, we note that it was referred in 2016² but has not been decided and is awaiting further information. There are many other discrepancies in the application which are outdated and misleading for the purposes of public consultation,
- while the dates of the various chapters have been updated, the information provided in many of the documents is outdated and is not consistent with current Queensland and Federal environmental legislation and policy,
- The EIS was provided for public comment in 2021 with the EIS assessment report prepared in November 2025. However, this assessment report³ was not provided with the application for the Project, and
- The project overlaps two current mining leases associated with the existing Saraji Mine and an additional two additional MLAs which are the subject of the current application. It is unclear on why these projects have been submitted separately given they are linked by a common EA and are for the same project. This does not make it easy for the public to understand the process for submitting comments on the Project.

These deficiencies undermine confidence in the assessment and prevent informed public participation.

Overlapping tenure/ownership

The proposed MLAs are jointly held by the Proponent and the Central Queensland Coal Associates Joint Venture (CQCA). CQCA are the holders of EPC837 and EPC2103 which underly the MLA areas.

¹ [BMA \(23 May 2013\) Application form. Site specific application for an environmental authority](#)

² [Saraji East Mining Lease Project, Qld \(EPBC 2016/7791\) - 15 March 2026](#)

³ [Queensland Government \(24 November 2025\). EIS Assessment report: Saraji East Mining Lease Project](#)

The Proponent considers that following the approval of the Project and granting of the MLs, both EPCs will be superseded and fall away.⁴

The proposed Project tenure is overlapped by two Authorities to Prospect (**ATP**). ATP 1103 is managed by Arrow Energy with associated Potential Commercial Areas (**PCA**) 144 and PCA 262. ATP 814 is held by Blue Energy Ltd with associated PCA 199.

There do not appear to be any agreements for coordination arrangements in place, although the Proponent acknowledges that this is a prerequisite for securing the grant of MLA 70383 and MLA 70459, and the development of the Project.

Terrestrial ecology

The Proponent undertook a desktop assessment and five field surveys between 2007 and 2020. These investigations identified numerous threatened ecological communities, regional ecosystems, threatened species, and migratory species that will, or are likely to, be impacted by the Project⁵:

Threatened ecological communities (**TEC**)

- 526.7 ha of brigalow (*Acacia harpophylla* dominant and co-dominant),
- 151.1 ha of Weeping Myall Woodlands, and
- 1.7 ha of natural grasslands of the Queensland Central Highlands and the northern Fitzroy Basin.

Threatened Regional Ecosystems (**RE**) in addition to TECs

- 23 ha of RE 11.3.4 *Eucalyptus tereticornis* and/or *Eucalyptus spp.* woodland on alluvial plains.
- 192 ha of RE 11.3.25 *Eucalyptus tereticornis* or *E. camaldulensis* woodland fringing drainage lines.
- 16.6 ha of RE 11.3.27B Lacustrine wetland (e.g. lake). Vegetation ranges from open water +/- aquatics and emergents. Occurs on billabongs no longer connected to the channel flow.
- 22.1 ha of RE 11.4.13 *Eucalyptus orgadophila* open woodland on Cainozoic clay plains.
- 1480.1 ha of RE 11.5.3 *Eucalyptus populnea* ± *E. melanophloia* ± *Corymbia clarksoniana* on Cainozoic sand plains/remnant surfaces, and
- A further 145 ha of high value regrowth, including TECs and threatened REs.

Threatened species

- 1,862.3 ha of squatter pigeon habitat (*Geophaps scripta scripta*: vulnerable),
- 1,160.7 ha of koala habitat (*Phascolarctos cinereus*: endangered),
- 748.1 ha of greater glider habitat (*Petauroides volans*: endangered).
- 886.02 ha of ornamental snake habitat (*Denisonia maculata*: vulnerable),
- 1,163.35 ha of king bluegrass (*Dichanthium queenslandicum*: endangered),
- 713.0 ha of Australian painted snipe habitat (*Rostratula australis*: endangered),
- 3,113.6 ha of grey falcon habitat (*Falco hypoleucos*: vulnerable).
- Unspecified loss of Latham's snipe habitat (*Gallinago hardwickii*: vulnerable), and
- Unspecified loss of white-throated needletail habitat (*Hirundapus caudacutus*: vulnerable and migratory).

⁴ [BMA \(13 December 2024\) Chapter 3 Project Description](#)

⁵ [BMA \(30 August 2024\) Chapter 6 Terrestrial Ecology](#)

Listed migratory species

- fork-tailed swift habitat (*Apus pacificus*)
- Latham’s snipe habitat (*Gallinago hardwickii*),
- white-throated needletail habitat (*Hirundapus caudacutus*), and
- Caspian tern habitat (*Hydroprogne caspia*).

The scale of habitat clearing and disturbance associated with the Project is substantial and demonstrates that the Project area contains habitat of state and national conservation significance, including important connectivity values for threatened species and ecological communities.

Notably, the field surveys informing this assessment are now more than six years old. They do not reflect current conservation statuses or recent population declines and are therefore unlikely to accurately represent the present condition or extent of habitat within the Project area.

Cumulative impacts

The Proponent acknowledges that nature conservation of the northern Brigalow Belt bioregion has received increasing attention due to the rapid and extensive loss of habitat that has occurred. The Project is situated within the Isaac-Comet Downs subregion where over 78.8% of vegetation cover has already been cleared.⁶

Despite this, the Terrestrial Ecology assessment⁵ does not adequately assess cumulative habitat loss. Instead, it relies on assumptions that species—such as the koala—will relocate in response to disturbance. This approach fails to consider the well-documented impacts of cumulative habitat loss, fragmentation, and degradation, which reduce habitat availability, limit dispersal, and increase the risk of local extinction.

The conservation status of several key species, including the Koala, Greater Glider, and Grey Falcon, is understated throughout the EIS. While this is attributed to the timing of the controlled action decision, it does not reflect current listings or the trajectory of decline driven by cumulative habitat loss and climate change.

A separate cumulative impact chapter⁷ has been provided; however, the information is outdated and inconsistent with other sections of the EIS. For example, the assessment initially characterises most of the vegetation to be disturbed as non-remnant and of low conservation value. This directly conflicts with subsequent statements acknowledging the clearing of up to 1,200 ha of remnant vegetation and areas of high-value regrowth within the Project footprint.

The Terrestrial Ecology assessment also clearly identifies the Project area as supporting significant conservation values, contradicting claims of low ecological importance.

The cumulative impact assessment is therefore fundamentally flawed. It considers the impacts of the Project in isolation and fails to assess the Project’s contribution to ongoing habitat loss across the Northern Bowen Basin bioregion and the Isaac–Comet Downs subregion.

Given the already extensive clearing in the region, any additional loss or disturbance of habitat is highly likely to result in significant impacts on threatened species and ecological communities, including further declines in conservation status and an increased risk of local extinctions.

⁶ [Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. \(2024\). *Remnant Regional Ecosystem Vegetation in Queensland \(Version 13.1\), Analysis 1997–2021*. Queensland Department of Environment, Science and Innovation: Brisbane.](#)

⁷ [BMA \(15 September 2023\) Chapter 22 Cumulative impacts](#)

Offsets

An offset strategy has been developed for the Project to mitigate a net loss in biodiversity.⁸ The proposed strategy takes into consideration both the offset requirements under the Queensland Government's Biodiversity Offsets Policy and the EPBC Act Environmental Offset Policy.

In the documentation provided, the Proponent only provides an estimate of areas of residual impacts for MNES and MSES. EnvA notes that "an offsets package will be proposed based on the final vegetation mapping agreed with DES and in accordance with the Queensland Government's Biodiversity Offsets Policy and the Commonwealth's Offset Policy Statement."

EnvA holds serious concerns about the general ineffectiveness of biodiversity offsets in Australia. Even the Federal Environment Minister stated that "We know the current offset arrangements are broken and making nature worse."⁹

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 across the state.¹⁰ Further to this, there is a lack of suitable land for offsetting the impacts of development¹¹, particularly in the Brigalow Belt bioregion which has been, and continues to be, extensively cleared for agriculture and coal mines¹².

Avoidance of impacts must remain the primary mitigation strategy. Where impacts to threatened species habitat and ecological communities cannot be avoided, they should not be approved based on uncertain or ineffective offsets.

Rehabilitation

This submission is in relation to a proposed greenfield coal mine with an associated new Environmental Authority and Mining Lease. Site-specific EA applications for mining leases would normally require that a Progressive Rehabilitation and Closure Plan (**PRCP**) as part of their application.

Despite the application now being assessed, the terms of reference for the project was established prior to the legislative requirement for a progressive rehabilitation and closure plan to be included as part of the EIS³ EnvA considers that the Proponent is exploiting a loophole in the provisions in place for transitioning to the PRCP framework through consistent extensions to timeframe extension requests. EnvA considers that there were many opportunities to request that a PRCP be provided in the requests for correcting matters that had not been adequately addressed or through issuance of a transition notice.

However, the proponent will need to submit a proposed progressive rehabilitation and closure plan for the project and amend the Saraji Mine progressive rehabilitation and closure plan that incorporates the rehabilitation information provided in the EIS following the completion of the environmental impact assessment process.³

The Rehabilitation Management Plan (**RMP**)¹³ provides preliminary mitigation, adaptive management and monitoring approach to be implemented as was drafted in support of the EIS process. The final plan will be prepared prior to the commencement of activities.

⁸ [BMA \(27 June 2025\) Appendix C-2 Offset strategy](#)

⁹ [The Guardian \(2024\) A third of land set aside for restoration in worse state than before, Australian offset audit finds.](#)

¹⁰ [Queensland Government \(2024\). State of the Environment Report](#)

¹¹ [Queensland Government. In-demand offsets](#)

¹² [Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. \(2023\). Remnant Regional Ecosystem Vegetation](#)

¹³ [BMA \(21 June 2024\) Appendix K-1 Rehabilitation Management Plan](#)

EnvA considers that PRCP plan must improve on the RMP and provide the following recommendations:

- Given the significant impact on threatened species and communities, rehabilitation activities must focus on reinstating habitat to a greater extent than was previously available,
- Subsidence is likely to continue post mining which will make rehabilitation difficult to manage after completion criteria has been met. The subsidence areas also coincide with most of the woodland habitat,
- Specific completion criteria must be clearly identified, particularly for woodland and riparian ecosystem rehabilitation, and
- A PRCP schedule and increased monitoring frequency of woodland habitat and watercourse post mining land uses in the first 5 years of rehabilitation.

Water Resources

Mine affected water management

The information provided on surface water is difficult to interpret due to inconsistencies across multiple documents. Supplementary Information¹⁴ indicates that the Project Description has been amended, including changes to proposed mine affected water (**MAW**) release points.

However, neither the Project Description nor the Surface Water¹⁵ chapter has been updated to reflect the removal of the proposed licensed release point on Boomerang Creek adjacent to the proposed process water dam. This inconsistency across key documents makes it challenging to form a clear and reliable understanding of the Project's proposed MAW management framework.

Based on the available information, the MAW management approach appears to rely on the following measures:

- Minimising the volume of MAW generated on site and reusing water to meet project demands where possible;
- Transferring MAW from selected storages to the process water dam in accordance with a Trigger Action Response Plan (TARP) that has not yet been developed;
- Future detailed design of regulated structures and drainage features, which has not been provided for assessment;
- Reliance on storage capacity to minimise the risk of uncontrolled discharges to the receiving environment.

Critically, the Proponent also relies on a water transfer agreement between Caval Ridge, Saraji South, Peak Downs and Saraji coal mines, facilitated through the Central Regional Water Network (**CRWN**) pipeline. This network is presented as a contingency measure, allowing transfer and storage of MAW across multiple sites during periods of excess water.

The Project is intended to operate independently under normal conditions, with the CRWN only used during extreme events. However, there is no clear commitment to connect the Project to the CRWN, nor any detail regarding how or when such a connection would be established. The absence of this information presents a significant risk, as the infrastructure required to transfer water cannot be implemented in response to an emerging extreme weather event.

¹⁴ [BMA \(29 August 2025\) Attachment 1. Supplementary Information](#)

¹⁵ [BMA \(28 August 2024\) Chapter 8 Surface Water](#)

In the context of a changing climate, this reliance on undefined and uncommitted contingency measures is particularly concerning. The Climate Council of Australia¹⁶ has warned that Australia is entering “uncharted territory” with respect to extreme weather, noting that historical patterns are no longer a reliable guide as records continue to be broken.

EnvA further challenges the Proponent’s assertion that there is “ample” storage and that extreme weather events are “rare”. In the last few months, all coal mines connected to the CRWN pipeline released MAW into the local waterways. Discharges from Saraji and Caval Ridge could not be managed within the conditions of their respective environmental authorities.

Rather than transferring excess water through the CRWN, the operators applied for, and were granted, Temporary Emissions Licences (TEs). Despite these licences being in place for extended periods, continued rainfall required further TEL applications, with discharges ongoing at the time of writing (refer table 1).

Table 1. Temporary emissions licences provided to Caval Ridge and Saraji coal mines in 2026

TEL	Commencement	Completion	Status	EA reference	Coal mine
TEL101018087	21/01/2026	20/02/2026	Expired	EPML00562013	Caval Ridge Mine
TEL101039702	20/02/2026	30/04/2026	Granted	EPML00562013	Caval Ridge Mine
TEL101015651	17/01/2026	14/03/2026	Expired	EPML00862313	Saraji
TEL101015656	10/03/2026	20/04/2026	Granted	EPML00862313	Saraji

This demonstrates that:

- the existing network does not provide sufficient storage or transfer capacity during high rainfall periods; and
- reliance on contingency measures does not prevent exceedances or uncontrolled releases.

While the Proponent has removed the licensed release point on Boomerang Creek, it has not clearly identified how surplus water in the proposed process water dam will be managed. In the absence of detailed design, firm infrastructure commitments, and demonstrable capacity to manage extreme rainfall events, the Project fails to provide sufficient assurance that uncontrolled discharges of mine affected water can be avoided.

Cumulative MAW releases.

Coal mine water releases are regulated through Environmental Authorities, however, the cumulative impacts of these releases are not adequately considered.

During the most recent wet season, there have been multiple and concurrent mine water releases from operations within the same catchment area.¹⁷ New and expanding coal mines will further increase the likelihood of simultaneous discharge events, with releases flowing directly into the Great Barrier Reef catchment.

The latest water quality 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.¹⁸ Further impacts on water quality in the upper Great Barrier Reef Catchment is likely to result in a reduction of water quality and an increase in pollutants and sedimentation and contribute to the increasing pressures on the Reef ecosystem.

The absence of a cumulative impact assessment represents a significant deficiency in the Project’s environmental assessment. Without a basin-scale evaluation of concurrent and sequential mine

¹⁶ <https://www.climatecouncil.org.au/resources/climate-whiplash-wild-swings-between-weather-extremes/>

¹⁷ [Queensland Government Fitzroy Basin coal mine water releases 2025-2026](#)

¹⁸ [Fitzroy Partnership for River Health \(2025\). Fitzroy Basin Report Card July 2024 – June 2025](#)

water releases, it is not possible to determine whether water quality objectives and environmental values will be maintained. This is particularly critical in the context of the Reef catchment, where multiple discharge events—each individually compliant—may collectively result in significant degradation of downstream ecosystems. The Project therefore fails to demonstrate that it will avoid or mitigate cumulative impacts on receiving waters.

Surface water

The Project is located within the Upper Isaac catchment, part of the larger Fitzroy River catchment. Boomerang Creek, One Mile Creek, Hughes Creek, Plumtree Creek, Spring Creek and Phillips Creek traverse the Project area and ultimately flow into the Isaac River to the east of the Project. Of these, Boomerang Creek, Plumtree Creek and Hughes Creek intersect the underground mining panels and the predicted subsidence zone.

Advice from the Independent Expert Scientific Committee on Coal Seam Gas and Large Coal Mining Development¹⁹ identifies a range of potential impacts to surface water systems as a result of the Project, including:

- Altered flow regimes and increased sediment loads in Plumtree, Boomerang and Hughes creeks, with consequent impacts on aquatic and riparian ecosystems, water quality, and fish passage,
- Reduced surface flows in some areas due to subsidence-induced changes to surface water–groundwater interactions,
- Destabilisation of creek banks, increased erosion, and impacts to riparian vegetation that provide critical ecological corridors,
- Changes to surface runoff, flooding patterns and groundwater recharge associated with predicted subsidence of 1.4–2.5 m (and up to 3.5 m in some areas), which are likely to alter the hydrology of ephemeral streams, floodplains, and wetlands, and
- Impacts to approximately 246 ha of brigalow (*Acacia harpophylla*) threatened ecological community and associated habitats, including ornamental snake habitat, due to cracking and localised changes in topography.

These impacts are interconnected and demonstrate that subsidence will fundamentally alter the hydrological function of waterways within the Project area, with flow-on consequences for water quality, habitat condition, and ecological connectivity.

The Proponent has proposed to mitigate these impacts through mechanisms including:

- Standard erosion and sediment control measures,
- Installation of drainage earthworks to reduce ponding,
- Relocate fish and other aquatic fauna stranded in land-based ponds or drainage channels, and
- Repairing surface cracks in areas of high erosion risk.

While these measures may provide some localised or short-term benefit, they do not address the underlying cause of impact—namely, large-scale subsidence and altered surface water drainage. Many of the proposed measures are reactive rather than preventative, relying on post-impact intervention rather than avoiding or minimising harm.

In particular, the relocation of aquatic fauna and repair of surface cracking acknowledge that significant disturbance will occur but do not prevent degradation of stream structure, altered flow regimes, or loss of ecological function. Similarly, standard erosion and sediment controls are unlikely

¹⁹ [IESC 2021-122: Saraji East Mining Lease Project \(EPBC No. 2016/7791\) – Expansion](#)

to be effective in managing the scale of hydrological change associated with subsidence of this magnitude.

EnvA considers that these mitigation measures are insufficient to prevent significant impacts to surface water systems within the Project area and downstream catchments. The predicted alterations to flow regimes, sediment transport, and hydrological connectivity are likely to result in long-term degradation of waterways and associated ecosystems.

Accordingly, the Project fails to demonstrate that impacts to surface water can be avoided or adequately mitigated, and there is a high likelihood of significant and irreversible impacts to hydrological processes and aquatic ecological values.

Ground water

There are three main aquifer systems located within the project area – Quaternary alluvium (associated with Boomerang and Plumtree creeks), Tertiary sediments, and the Coal seams (contained within the Permian coal measures). These systems are primarily recharged from creek flow events and is currently of low water quality.²⁰

The Project would require the dewatering of groundwater, with the Independent Expert Scientific Committee (IESC)¹⁹ identifying that mine induced groundwater movement as a key risk of this Project. The Project is predicted to cause near-surface ground movement, increase water drawdown and alter the interactions between ground and surface water. The subsidence would lead to surface cracking and potentially lead to vertical connectivity between surface and groundwater. There are also likely to be impacts on groundwater dependent ecosystems, many of which provide critical habitat for threatened species and communities.

The Proponent acknowledges the uncertainty using predictive modelling and counters this with the plan to develop a ground water monitoring program to monitor the actual changes to groundwater conditions.

EnvA considers that the uncertainty of the modelling, combined with the uncertainty of extreme weather events resulting from the climate change is reason to invoke the precautionary principal until all the IESC recommendations have been addressed.

Greenhouse Gas (GHG) emissions

Emission estimates

Scope 1

Scope 1 emissions will be generated through:

- Direct emissions from diesel fuel combusted by mining equipment,
- Fugitive emissions from the flaring of drained mine gas,
- Fugitive emissions of CH₄ and CO₂ from underground air ventilation,
- Fugitive emissions from post-mining (coal handling and processing) activities, and
- Fugitive emissions of CH₄ from the decommissioned mine for up to 20 years post-closure.²¹

There is a lack of consistency in the reported Scope 1 emissions across the Project documentation. The Project is described as generating approximately 18 Mt CO₂-e of Scope 1 emissions; however, the text below Table 11-20 indicates 17.4 Mt CO₂-e²², while the Executive Summary reports combined Scope 1 and 2 emissions of 16.34 Mt CO₂-e²³.

²⁰ [BMA \(13 December 2024\) Chapter 9 Groundwater](#)

²¹ [BMA \(undated\) Appendix P Draft Decarbonisation Plan](#)

²² [BMA \(13 December 2024\). Chapter 11 Air Quality and Greenhouse Gas](#)

²³ [BMA \(undated\) Executive summary](#)

These discrepancies create uncertainty regarding the true emissions profile of the Project. This uncertainty is compounded by the Proponent's statement that flaring of gas may not occur where it is not commercially viable, safe, or technically feasible. As the emissions estimates appear to assume full flaring of captured gas, any deviation from this assumption would result in materially higher Scope 1 emissions. In the absence of a firm commitment to gas capture and flaring²⁴, the reported emissions are likely to be underestimated.

EnvA further notes that flaring of gas may not occur if it is not commercially viable, unsafe or not technically practical. This would result in all estimates being an underestimate of scope 1 emissions, particularly given the lack of commitment presented in the Proponent's Summary of Commitments²⁴.

Scope 2

Scope 2 emissions have not been meaningfully assessed on the basis that the Proponent intends to enter into a renewable power purchase agreement with CleanCo Queensland by 2027. However, this agreement is not currently in place and cannot be relied upon in the assessment of the Project.

While the use of renewable energy is supported, the reliance on an unfinalised agreement does not provide sufficient certainty regarding the Project's electricity-related emissions. In the absence of a binding arrangement, Scope 2 emissions should be fully quantified and assessed.

Scope 3

There are also significant inconsistencies in the estimation of Scope 3 emissions across the Project documentation. The Air Quality and Greenhouse Gas chapter²² estimates Scope 3 emissions at 451 Mt CO₂-e, Table 11-21 reports 310 Mt CO₂-e, and the EIS assessment report identifies 437 Mt CO₂-e³.

This variation of more than 100 Mt CO₂-e indicates a lack of methodological consistency and undermines confidence in the reliability of the emissions assessment. Given that Scope 3 emissions represent the majority of the Project's total emissions, these discrepancies are material and must be resolved.

GHG abatement plan

There are no meaningful GHG abatement or mitigation measures provided in the draft GHG abatement Plan for the Project²¹. The Proponent refers to the company's broader emission reduction targets and some high-level and largely aspirational concepts, including:

- Preferencing fuel efficient mining equipment during procurement,
- Maintaining mining equipment in good working order,
- Considering gas drainage and abatement of incidental mine gas,
- Transition from diesel to electric machinery and equipment when the technology is available, and
- Comply with the Safeguard Mechanism through the use of Australian Carbon Credit Units (ACCUs).

The Greenhouse Gas Emissions guideline²⁵ requires proponents to provide accurate emissions estimates and detailed, project-specific mitigation measures to progressively reduce emissions over the life of the Project. It further notes that incomplete or substandard plans may warrant an information request.

²⁴ [BMA \(undated\) Summary of commitments](#)

²⁵ [Queensland Government \(January 2026\) Greenhouse gas emissions guideline](#)

EnvA considers that the GHG Abatement Plan does not meet this standard. The Plan relies on assumptions—particularly the assumption of full gas flaring—that are not supported by binding commitments and are unlikely to be achieved in practice.

Further, the lack of consistency in emissions estimates across the Project documentation, combined with the absence of a detailed decarbonisation pathway, prevents a clear understanding of the Project's true emissions profile.

The documentation provided represents the only opportunity for public comment on the Environmental Authority and Mining Lease applications. The presence of inconsistent, incomplete, and potentially misleading information does not enable informed public participation. Noting that the Proponent intends to refine emissions estimates and mitigation measures in future studies, the current assessment is premature.

Given that a robust abatement plan is a requirement of the assessment process, the Project should not be approved until a detailed, evidence-based, and enforceable GHG abatement plan is provided.

Climate context

The scientific consensus is unequivocal: expansion of fossil fuel production is incompatible with limiting global warming to safe levels.²⁶ Australia, alongside 196 other nations, is a signatory to the Paris Agreement²⁷, which commits countries to pursue efforts to limit warming to 1.5°C and well below 2°C.²⁸ Meeting these targets requires the rapid phase-out and non-expansion of fossil fuel developments.

Expansion of fossil fuel production in 2026 is fundamentally inconsistent with credible 1.5°C pathways and exposes Australia to increased physical, ecological and economic risks.

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.²⁹

The Project is also contrary to standard criteria (b) as it is contrary to many State or Commonwealth plans, standards and agreements including (but not limited to):

- The Paris Agreement,²¹
- Legislated emission reduction targets³⁰ and interim targets³¹,
- Belem Declaration on the Transition away from fossil fuels³², and the
- Global Methane Pledge.³³

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,

²⁶ [Intergovernmental Panel on Climate Change, *Climate Change 2022*](#)

²⁷ [United Nations – climate change The Paris Agreement](#)

²⁸ [UN Framework Convention on Climate Change, Adoption of the Paris Agreement, 21st Conference of the Parties, Paris \(2015\)](#)

²⁹ [International Energy Agency \(2024\). *World Energy Outlook 2024*](#)

³⁰ [Climate Change Act 2022](#)

³¹ [Australian Government \(2025\) *Setting our 2035 target and path to net zero*](#)

³² [Australia joins Belém Declaration to transition from fossil fuels](#)

³³ [Global Methane Pledge](#)

- Repeated mass coral bleaching events on the Great Barrier Reef,
- Intensified drought conditions, and
- Declining conservation status of threatened species and ecosystems.

In this context, approval of the Project would contribute to cumulative global emissions and is inconsistent with both domestic and international climate objectives.

Project justification

Both Queensland and Commonwealth environmental assessment frameworks purport to assess whether projects “stack up” by weighing social and environmental risks against economic benefits.

The Proponent notes that coal is Queensland’s largest export commodity with the Queensland Government benefitting significantly from royalties paid each year, with this Project will add to these royalties. Additional employment and training opportunities would also be secured.

Further justification of the project is based on a growing demand for metallurgical coal. This is based on forecasts of demand largely based on a 2021 Wood Mackenzie analysis³⁴ which expected seaborne metallurgical coal exports to grow over the next three decades.

This economic justification is negated by the Proponent’s recent comments and actions and more recent forecasts of metallurgical coal demand.

In the last six months, the Proponent has:

- been actively asking for Queensland’s royalty rates to be reduced and promoting misinformation in relation to ‘excessive’ royalty rates imposed in Queensland,³⁵
- indicated that they will no longer invest in Queensland,³⁶
- withdrawn support for the training facility in Queensland,³⁷
- Have slashed 750 Queensland jobs, and
- have mothballed the approved Saraji South Coal mine resulting in the loss of over jobs for over 70 employees.³⁸

The Proponent asset president said the mothballing and job cuts were “necessary decisions in the face of the combined impact of the Queensland government’s unsustainable coal royalties and market conditions. The simple fact is the Queensland coal industry is approaching a crisis point.”³⁹

In relation to the future demand for metallurgical coal, more recent forecasts do not support a growing demand. For example:

- The International Energy Agency forecasts predict a decline in demand for metallurgical coal³⁹,
- the World Bank identifies that coal prices are falling and will continue to fall in 2026 due to a weak import demand from Asia and a potential supply glut⁴⁰,
- Treasury modelling further predicts that the value of Australia’s coal and gas exports will plummet by 50% over the next five years.⁴¹
- Australia’s coal production far exceeds demand needs.⁴²

³⁴ [BMA \(undated\) Chapter 2 Project alternatives and justification](#)

³⁵ [Mining and Energy Union \(29 August 2025\) Queensland shows how to get a fair return from resources](#)

³⁶ [Courier Mail \(4 March 2026\) BHP doubles down despite latest twist](#)

³⁷ [Industry Queensland \(4 March 2026\) Axe falls on BHP’s FutureFit training venture in Mackay](#)

³⁸ [The Guardian \(17 September 2025\) Queensland deputy premier labels BHP ‘unAustralian’ as mining giant blames job cuts on coal royalties scheme](#)

³⁹ [International Energy Agency \(2025\) Analysis and forecast to 2030](#)

⁴⁰ [World Bank \(2 June 2025\) Weakening demand, steady supply: What’s driving coal’s price decline in 2025?](#)

⁴¹ [Australian Government \(September 2025\) Australia’s Net Zero Transformation: Treasury Modelling and Analysis](#)

⁴² [Institute for Energy Economics and Financial Analysis \(2025\) Australia’s coal production limits far exceed actual output, so why approve new mine developments?](#)

The cost-benefit analysis presented in the economic chapter⁴³ is based on assumes that construction commences in 2023 and is finalised in 2025, with operations anticipated to commence in 2025. The costs estimates are outdated, with a clear indication that operational costs have risen considerably since the assessment was made.

The economic and jobs justification is weak, and in no way compensates for the significant impacts on the environment and our climate as outlined in this submission. In this context, there is no justification for further environmental and climate damage for a project unlikely to deliver genuine economic or social benefit. Proceeding with the Project in these circumstances would be inconsistent with the EPBC Act's principles of ecologically sustainable development, given the lack of demonstrable economic or social benefit and the irreversible environmental damage, and would also be inconsistent with standard criteria under s191 of the EP Act – specifically:

- (a)(iii) conservation of biological diversity and ecological integrity,
- (e) the character, resilience and values of the receiving environment, and
- (i) the public interest.

Human rights

Approval of the Project would limit multiple human rights protected under the *Human Rights Act 2019 (Qld)* (HR Act), including:

- Right to life (s 16)
- Cultural rights of First Nations peoples (s 28)
- Rights of children (s 26)
- Right to property (s 24)
- Right to privacy and home (s 25(a))
- Right to equality and non-discrimination (s 15(2)).

The decision-maker, as a public entity under s9 of the *Human Rights Act 2019 (Qld)*, must give proper consideration to relevant human rights in accordance with s58 of that Act.

The Queensland Land Court has recognised that activities involving increased GHG emissions engage and potentially limit protected human rights, particularly where those emissions contribute to foreseeable climate harms⁴⁴. Human rights must be interpreted broadly and purposively, consistent with the protective intent of the HR Act, before any assessment is made as to whether a limitation is demonstrably justified under s 13.

The approval of a project that materially increases GHG emissions contributes to climate change impacts that are now well-documented, foreseeable, and increasingly severe. These impacts directly and indirectly threaten:

- The right to life, through increased frequency and intensity of heatwaves, bushfires, floods, and severe storms;
- Children's rights, as younger and future generations will bear a disproportionate burden of climate harms over their lifetime;
- Cultural rights of First Nations peoples, whose connection to Country depends on the protection of land, waters, biodiversity, and ecological integrity;
- Rights to property and home, through climate-related damage, displacement, and escalating insurance costs; and

⁴³ [BMA \(22 September 2023\) Chapter 18 Economics](#)

⁴⁴ [Human Rights Law Centre \(2022\) Landmark recognition of human rights and environmental impacts as grounds for a recommendation against the grant of a mining lease](#)

- Equality rights, given that climate impacts disproportionately affect vulnerable and regional communities.

The risks to these rights must be weighed against any projected economic benefits of the Project. Where those benefits are contingent upon activities that exacerbate the climate crisis and contribute to biodiversity loss — including impacts on threatened species, ecological communities, and natural assets that underpin regional economies — the justification for limiting human rights becomes increasingly difficult to sustain.

Rising global temperatures and the increasing frequency of extreme weather events threaten long-term social and economic stability. Communities in Queensland are already experiencing intensified heatwaves, flooding events, and climate-related disasters. These impacts are projected to worsen, creating intergenerational inequity as future generations inherit heightened risks, diminished natural assets, and escalating adaptation costs.

The health consequences of a warming climate are well established. Increased heat stress, the spread of vector-borne diseases, mental health impacts following disasters, and injury or loss of life from extreme events directly engage the right to life and children’s rights under the HR Act.

Climate change also imposes significant and compounding economic burdens. Insurance premiums have risen markedly in response to increased climate-related claims, and there is a growing risk that insurance will become unaffordable or unavailable in high-risk areas.

Construction and infrastructure costs are increasing as climate resilience measures become necessary. Tourism and other industries reliant on environmental assets face decline as ecosystems are degraded, including coral reef systems affected by bleaching and cumulative climate impacts.

In these circumstances, approval of the Project would represent a limitation on protected human rights that is neither minor nor speculative. Given the well-established and escalating nature of climate harms, the decision-maker must rigorously assess whether any such limitation can be demonstrably justified in a free and democratic society based on human dignity, equality and freedom, as required by s 13 of the HR Act.

Standard criteria

For the reasons outlined above, the application fails to satisfy the standard criteria under s191 of the EP Act 1994, specifically:

Inconsistent with the precautionary principle - standard criteria (a)(i)

The precautionary principle provides that “where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation”.

The impacts of climate change contributed to by the Project’s continued accretion of GHG emissions, the impacts of the Project on biodiversity, and the impacts of the Project on groundwater and surface water, present a real risk of serious or irreversible environmental damage, such that approval of the Project would be inconsistent with the precautionary principle.

Inconsistent with the intergenerational equity - standard criteria (a)(ii)

The impacts to the environment and the contribution to climate change would have adverse effects on present and future generations, and as such approval of the Project would be inconsistent with the principle of intergenerational equity.

The economic benefits of the Project are overstated and do not outweigh the adverse impacts of the Project on present and future generations.

Inconsistent with the principle of the conservation of biological diversity - standard criteria (a)(iii)

The principle of the conservation of biological diversity is drawn from the *Convention on Biological Diversity*, which defines 'biological diversity' as 'the variability among living.

The impacts of climate change contributed to by the Project's continued accretion of GHG emissions, the direct impacts of the Project on biodiversity, and the impacts of the Project on groundwater and surface water, would have adverse effects on biological diversity, such that approval of the Project would be inconsistent with the principle of conservation of biological diversity.

Inconsistent with Commonwealth and State plans - standard criteria (b)

The identified impacts of the Project are inconsistent with Commonwealth and State government plans, standards, agreements and requirements about environmental protection and ecologically sustainable development, including:

- (a) The Intergovernmental Agreement on the Environment⁴⁵
- (b) The National Strategy for Ecologically Sustainable Development⁴⁶
- (c) Australia's Strategy for Nature 2024–2030⁴⁷
- (d) The Paris Agreement,²¹
- (e) Legislated emission reduction targets⁴⁸ and interim targets⁴⁹,
- (f) Belem Declaration on the Transition away from fossil fuels⁵⁰, and the
- (g) Global Methane Pledge.⁵¹

Approval of the Project would be inconsistent with the above plans, standards, agreements and requirements, with potential inconsistency with other plans, and standards.

Adversely affect the character, resilience and value of the receiving environment - standard criteria (e)

The Project would have adverse effects on the character, resilience and value of the receiving environment including:

- (a) the ecosystem and communities of the region,
- (b) the natural and physical resources of the region,
- (c) the qualities and characteristics of the region that contribute to its biological diversity and integrity,
- (d) the intrinsic or attributed scientific value or interest of the region,
- (e) amenity, harmony and sense of community, and
- (f) the social, economic, aesthetic and cultural conditions that affect, or are affected by other aspects of the environment.

Approval of the Project would adversely affect the character, resilience and value of the receiving environment.

Contrary to the public interest - standard criteria (i)

In the context of the EP Act, the public interest is primarily that embodied in section 3, namely the public interest in ecologically sustainable development, or the protection of Queensland's environment while allowing for development that improves the total quality of life, both now and in the future, in a way that

⁴⁵ [Australian Government \(1992\) Intergovernmental Agreement on the Environment](#)

⁴⁶ [Australian Government \(1992\) The National Strategy for Ecologically Sustainable Development](#)

⁴⁷ [Australian Government \(2024\) Australia's Strategy for Nature 2024-2030](#)

⁴⁸ [Climate Change Act 2022](#)

⁴⁹ [Australian Government \(2025\) Setting our 2035 target and path to net zero](#)

⁵⁰ [Australia joins Belém Declaration to transition from fossil fuels](#)

⁵¹ [Global Methane Pledge](#)

maintains the ecological processes on which life depends.

The impacts of climate change contributed to by the Project's continued accretion of GHG emissions, the impacts of the Project on biodiversity, and the impacts of the Project on groundwater and surface water, are inconsistent with the maintenance of the ecological processes on which life depends, and as such approval of the Project would be contrary to the public interest.

Not compatible with human rights

The administering authority as a public entity must not act or make a decision in a way that is not compatible with human rights.⁵²

The contribution of the Project to the continued accretion of GHGs in the atmosphere and the resulting impacts of climate change will limit, beyond the extent that is reasonable and demonstrably justifiable in accordance with section 13 of the HR Act.

In the decision of the Queensland Land Court of *Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors (No 6)* [2022] QLC 21, President Kingham found that the link between the approval of Projects which contribute to climate change and the impact of that harm on human rights is sufficiently connected so as to enliven consideration of the HR Act.⁵³

For the reasons outlined above, the Project presents unacceptable and inadequately mitigated risks to biodiversity, water resources, climate, and human rights. The assessment is characterised by inconsistencies, outdated information, and critical omissions that prevent a reliable understanding of impacts. In these circumstances, the application should be refused.

Thank you again for the opportunity to make comment on the Application for new Environmental Authority – Saraji East (A-EA-NEW-100986365) and Mining Lease MLA70383.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland

⁵² *Human Rights Act 2019* (Qld), s 58.

⁵³ *Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors (No 6)* [2022] QLC 21, at [1703]-[1705].