

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

11 May 2026

Dear Minister,

**RE: Submission on Referral: Blackwater Northern Extension Project (EPBC 2026/10494)**

Thank you for the opportunity to make this submission in response to the referral of the Blackwater Northern Extension Project (**the Project**) proposed by Whitehaven Blackwater Pty Ltd. *et al.* (**the 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 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,
- will further degrade wildlife habitats of state and national significance through habitat loss, fragmentation and climate change, and
- rarely take into consideration the views of Traditional Owners and local communities who are concerned about protecting their land from fossil fuel development.

**The Project**

The Blackwater Mine (BWM) is located approximately 20 kilometres (km) south-west of Blackwater in the Bowen Basin, Queensland.

The Proponent is seeking approvals to extend the current mining operation for the Project, which would extend the mining area of the existing BWM on ML1759 and ML1762. The Project area is approximately 2,352 ha of which would be impacted by the Project's disturbance.

The proposed Project would extend the life of the mine from 2029 until 2055, increase production from 16 Mtpa to up to 19 Mtpa (product coal) and result in the extraction of an additional 200 million tonnes of coal.



The Proponent acknowledges that this mine expansion may change the magnitude of impacts to matters of national environmental significance (**MNES**) and identifies the MNES which will be significantly impacted as:

- (a) Listed threatened species and communities (ss 18 and 18A), and
- (b) Listed migratory species (ss 20 and 20A).

EnvA notes that a similar application was previously referred for EPBC Act assessment by BM Alliance Coal Operations Pty Ltd (Blackwater Mine – Northern Extension Project; EPBC no: 2023/09723). This was withdrawn by the Proponent in November 2025 and replaced by the current referral.

The current Project is smaller in that the:

- disturbance footprint has been reduced from 3,761ha to 2,352 ha,
- end of the life of mine shortened to 2055 from the previous application which proposed the life of the mine until 2085, and
- total coal volume to be extracted reduced from 220 to 200 million tonnes of coal.

### **ENVA'S SUBMISSION**

1. EnvA submits that the Project is likely to have clearly unacceptable impacts on matters of national environmental significance due to extensive habitat destruction, impacts on water resources, cumulative biodiversity loss, and the substantial greenhouse gas emissions associated with extending and expanding coal production until 2055.
2. In the alternative, EnvA recommends that this is considered a controlled action due to significant residual impacts 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).

We further recommend that this be assessed through a bilateral assessment Environmental Impact Statement (EIS) process. The Queensland Department of Environment, Science and Innovation has previously required an EIS process for the original project proposal and hence it seems sensible for this assessment to be assessed under the bilateral agreement.

3. We further recommend that additional controlling provisions be included due to the impacts of greenhouse gas emissions and downstream water impacts on MNES, including:
  - (a) World Heritage (ss 12 and 15A);
  - (b) National Heritage (ss 15B and 15C);
  - (c) Ramsar Wetlands (ss 16 and 17B);
  - (d) Commonwealth marine areas (ss 23 and 24A); and
  - (e) Great Barrier Reef Marine Park (ss 24B and 24C).

The Minister has previously accepted these as controlling provisions in the previous referral of the similar Blackwater North extension project.<sup>1</sup>

Further recommendations are provided in our grounds for submission below.

---

<sup>1</sup> [DCCEEW \(2024\) Statement of Reasons for a decision on a controlled action under the EPBC Act](#)

## GROUNDS FOR SUBMISSION

### Significant impact on threatened species and communities

As identified by the Proponent, this Project will have significant residual impacts on threatened species and communities including direct impacts on:

- 50.68 ha of Brigalow (*Acacia harpophylla* dominant and co-dominant) – endangered,
- 319.44 ha of squatter pigeon habitat - vulnerable,
- 61.4 ha of koala habitat – endangered, and
- 20.86 ha of Australian painted snipe habitat - endangered.

Notably, the Terrestrial Ecological Assessment Report<sup>2</sup> concludes that there is no ornamental snake habitat, when the previous referral identified 627 ha of habitat for this species and was identified as the only species that would be subject to significant impacts<sup>3</sup>.

EnvA appreciates that the Proponent considers that the Project should be considered as a controlled action under ss 18 and 18A of the EPBC Act.

We concur and consider that further information on the direct and indirect impacts on all potential threatened species and communities must be included through a detailed EIS assessment process. Any further loss or disturbance of habitat is significant in a region which has already been subject to significant habitat clearing and fragmentation.

### Significant impact on migratory species

As identified by the Proponent, this Project will have direct impacts on the:

- Fork-tailed swift (*Apus pacificus*)
- Latham's snipe (*Gallinago hardwickii*)
- Glossy ibis (*Plegadis falcinellus*)
- White-throated Needletail (*Hirundapus caudacutus*)

The proponent notes that there will be impacts to migratory species but does not consider these to be significant impacts<sup>4</sup>. EnvA submits that the cumulative loss and fragmentation of feeding habitat for these migratory species should be considered significant under ss 20 and 20A of the EPBC Act.

### Cumulative impacts

The Project must not be assessed in isolation. The Bowen Basin has already experienced extensive land clearing, habitat fragmentation, groundwater impacts, and cumulative greenhouse gas emissions associated with coal mining development. Additional disturbance associated with this Project would contribute to ongoing cumulative impacts on threatened species, ecological communities, water resources, and climate-sensitive MNES including the Great Barrier Reef.

### Significant Impact on Water Resources

The Proponent has determined that the Project will result in impacts on surface or groundwater and should be listed as a controlling provision.

---

<sup>2</sup> [Whitehaven \(2026\) Blackwater North Extension Project. Attachment 2 - Terrestrial Ecological Assessment Report](#)

<sup>3</sup> [BM Alliance \(2023\) Blackwater Mine – Northern Extension Project. EPBC referral application \(section 4.1.4.8\)](#)

<sup>4</sup> [Whitehaven \(2026\) Blackwater North Extension Project. EPBC referral application](#)

EnvA believes that the potential impacts to surface water resources through:

- direct disturbance associated with open cut mining,
- diversion of drainage features,
- creation of new temporary and permanent landforms that affect flood waters, and
- the release of water to the surrounding environment.

The Proponent also notes that there would be a potential indirect impact to the Great Barrier Reef World Heritage Property, National Heritage Place, and Marine Park due to the release of mine affected water into the catchment.

The Project also has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent aquifers due to changes in hydraulic gradients. Potential impacts to groundwater resources may include:

- potential drawdown of groundwater aquifers,
- alteration of groundwater flow directions and decrease in baseflow to surface water systems;
- localised effects on groundwater quality; and
- long-term changes to groundwater levels and flow direction in the vicinity of final voids.

EnvA recommends that the Minister decides that there are likely to be significant impacts on water resources associated with large coal mining developments, and that this Project must be a controlled action under ss 24D and 24E of the EPBC Act.

### **Significant impact of Greenhouse Gas (GHG) emissions on MNES**

The proposed Project would extend the life of the mine from 2029 until 2055, increase production from 16 Mtpa to up to 19 Mtpa (product coal) and result in the extraction of an additional 200 million tonnes of coal. The Project would also facilitate substantial downstream (Scope 3) emissions resulting from the eventual combustion of the extracted coal.

The GHG emissions, both annually and over the life of the mine from the Project are estimated to be significant over the life of the mine, although there appears to be no assessment of these emissions in the documentation provided.

EnvA contends that the GHG emissions from the Project constitute an 'impact' as defined by s 527E of the EPBC Act<sup>5</sup>. The Project involves the direct emissions of GHG emissions, and the warming effect of those emissions fall into the category of impact.

The Project will emit GHGs which cumulatively will increase global temperature and result in adverse impacts to MNES.

Australia, and of particular concern to EnvA, Central Queensland (where this mine is proposed), is already experiencing climate change impacts that include an increased frequency and severity of coral bleaching, storms, heat waves and wildfires, and an increase in the number of endangered species and ecosystems. If warming increases to 1.5°C and above, these impacts will increase in severity.

Therefore, it is our submission that the GHG emissions of this Project, and the warming effect of those GHG emissions, will have a significant impact on the following MNES which need to be included as controlling provisions on the following MNES:

- (a) World Heritage (ss 12 and 15A),
- (b) National Heritage (ss 15B and 15C),

---

<sup>5</sup> <https://www.dcceew.gov.au/environment/epbc/publications/epbc-act-policy-statement-indirect-consequences-action-section-527e-epbc-act>

- (c) Listed threatened species and communities (ss 18 and 18A),
- (d) Listed migratory species (ss 20 and 20A),
- (e) Great Barrier Reef Marine Park (ss 24B and 24C), and
- (f) Water resources (ss 24D and 24E).

The Minister has previously accepted these as controlling provisions in the assessment of the previous referral of the similar Blackwater North extension Project and despite the reduction in extent and duration, we firmly believe that the reasons for the listing of the above as controlling provisions have not significantly reduced.<sup>1</sup>

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

Kind regards



Dr Coral Rowston  
Director  
Environmental Advocacy in Central Queensland Inc.