

EPBC Submissions

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c/- Department of Climate Change, Energy, the Environment and Water – EPBC Referrals

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Submission: Saraji Mine Grevillea Pit Continuation Project (EPBC 2023/09757)

Thank you for the opportunity to make this submission in response to the invitation to make comment on the draft preliminary documentation for the Saraji Mine Grevillea Pit Continuation Project (**the Project**) proposed by BMA Alliance Coal Operations Pty Ltd (**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 both habitat loss 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 proposed action

The proposed Project is an extension to the Saraji Mine - Grevillea Pit coal mining operations. The proposed Project is located approximately 20km north of Dysart in the Bowen Basin within the Isaac Regional Council area. The intent is to access available resources located within MDL 700021 immediately east of ML1782 which is currently being mined.

The Saraji Mine has been in operation since 1974, producing approximately 16Mtpa of Run-of-Mine (**ROM**) coal. It is expected that the existing resources within the Grevillea Pit will be exhausted during the 2025 financial year. This Project would extend the footprint of the mine by approximately 220ha and extend the life of the mine until 2055.

If approved, the mine extension would prolong the life of the Saraji mine for another 30 years. There is no information about coal extraction rates over the 30 years or any information on estimated greenhouse gas emissions or any mitigation measures.



The Project was referred to the Department of Climate Change, Energy, the Environment and Water (**DCCEEW**) in December 2023 for assessment under the EPBC Act. The delegate of the Minister for the Environment determined on 4 June 2024 that the Project was a Controlled Action with the following controlling provisions:

- Listed threatened species and communities (section 18 and section 18A); and
- A water resource, in relation to coal seam gas development and large coal mining development (section 24D and section 24E).

The Minister's delegate determined the proposed action will be assessed by Preliminary Documentation.

ENVA'S SUBMISSION

EnvA submits that the Project is likely to have clearly unacceptable impacts on matters protected under the EPBC Act, particularly threatened species and ecological communities, water resources, and climate-related impacts on MNES. EnvA therefore recommends that the Project be refused.

Further recommendations are provided in our grounds for submission below.

GROUND'S FOR SUBMISSION

Significant impact on threatened species and communities

The Project would, or is likely to, impact numerous threatened species and communities listed under the EPBC Act, with DCCEEW requiring further assessment of seven threatened species and communities. The Preliminary documentation confirms that the project will impact on the habitat of:

- Brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)
- Poplar box Grassy Woodland on Alluvial Plains (Endangered)
- King blue-grass (*Dichanthium queenslandicum*) (Endangered)
- Bluegrass (*Dichanthium setosum*) (Vulnerable)
- Squatter pigeon (southern) (*Geophaps scripta scripta*) (Vulnerable)
- Ornamental snake (*Denisonia maculata*) (Vulnerable)
- Koala (*Phascolarctos cinereus*) (Endangered)
- Greater glider (*Petauroides volans*) (Endangered)

The Proponent considers that the only significant impact will be on 132.32 ha of ornamental snake habitat.¹

EnvA submits that this project will also impact the habitat of all the other species and communities listed above.

By way of examples:

- The project will clear 150.45 ha of Brigalow vegetation. The Proponent considers that the Brigalow regrowth and the small patch size of the remnant Brigalow does not meet the key diagnostic criteria for determination as Brigalow Threatened Ecological Community (**TEC**).

It must be noted the Project is situated within the Isaac-Comet Downs subregion where over 78.8% of vegetation cover has already been cleared.² EnvA considers that even

¹ [BMA \(2026\) Saraji Mine: Grevillea Pit Continuation. Preliminary Documentation \(EPBC 2023/09757\)](#)

² [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 and Science: Brisbane.](#)

regrowth and small patches of endangered TECs are important in the long-term recovery of the endangered TEC.

- The project will clear over 11 ha of the endangered poplar box woodland TEC (Figure 3-2¹). While the Proponent acknowledges the impact to this vegetation community, and notes that it provides an abundance of koala food trees and potential greater glider habitat, however this is not considered further in the assessment of impacts to MNES.
- The Proponent also considers that the loss of 11.29 ha of koala habitat and the indirect impacts on the koala and greater glider through the reduction in the width of the corridor and disturbance of the preferred habitat for these species along Phillips Creek (Figure 3-5¹).

EnvA considers that the clearing of habitat for all the above-listed threatened species and communities constitutes a significant impact that is exacerbated by cumulative habitat loss across the region.

Proposed offset management plan

An offset strategy has been developed for the Project to mitigate a net loss to ornamental snake habitat.³ As noted above, EnvA believes that, if approved, the Project will also impact on other threatened species and communities which should also be considered for offset requirements.

The proposed offset area for the ornamental snake is a 356 ha section of Croydon Station, located approximately 65 km east of the Project Site. The offset area does not provide any additional habitat, but seeks to:

- to protect and improve ornamental snake habitat within the Offset Area to a level at which provides greater conservation value than its current form and provides at least the same conservation value as the current impact site.
- manage and reduce threats to the ornamental snake within available habitat, and
- improve the condition and extent of regrowth vegetation providing / increasing connectivity values.

In addition to this, EnvA notes that the proposed offset area does not replace the habitat that will be destroyed by this project. The offset area management plan only proposes to marginally improve the habitat quality of an already vegetated area where ornamental snakes already occur and at a considerable distance from the project area.

EnvA further considers that the proposed offset fails to meet the requirements of the EPBC Act Environmental Offsets Policy.⁴ Specifically:

1. Suitable offsets must deliver an overall conservation outcome that improves or maintains the viability of the protected matter. Offsets must deliver an outcome that improves or maintains the viability of the protected matter relative to a “do nothing” scenario. In this case, the offset area already supports the listed species, and no evidence is presented to demonstrate that it can sustain higher population densities or expanded ecological functions. This means the offset does not create new habitat or improve long-term viability; rather, it preserves what already exists. Therefore, it fails to provide an additional conservation outcome.

³ [BMA \(March 2026\). Saraji Mine: Grevillea Pit Continuation \(EPBC 2023/09757\) - Offset Management Plan](#)

⁴ [EPBC \(2012\) Environmental Offsets Policy](#)

2. Tenure for direct offsets to constitute a legitimate offset, requires that the site must be legally secured in a way that ensures long-term protection and management. As identified in the Offset Area Management Plan, the proposed offset area is to be secured through a Voluntary Declaration under the *Vegetation Management Act 1999 (VM Act)*.

The use of a Voluntary Declaration under the VM Act—while legally recognised—is insufficient for enduring protection. The declaration is dependent on the landholder’s agreement and only remains in place until the objectives of the OAMP are achieved, the declaration ends, or when the authorised activities have ended (s19 of the VM Act).

3. Suitable offsets must be of a size and scale proportionate to the residual impacts on the protected matter. While improved management of threatened species habitat is positive, the proposed offset and lack of connectivity with the Project’s disturbance footprint will lead to the loss of the ornamental snakes from the project area.
4. Suitable offsets must be additional to what is already required, determined by law or planning regulations, or agreed to under other schemes of programs. EnvA considers that the proposed offset area already has a level of protection under the VM Act and the revised EPBC Act. The VM Act regulates the clearing of vegetation in a way that conserves remnant vegetation, prevents loss of biodiversity and maintains ecological function. Likewise, the EPBC Act amendments now require approvals for:
 - Clearing of vegetation that has not been cleared for at least 15 years, and
 - Clearing of vegetation from land within 50m of a watercourse, wetland or drainage line within the Great Barrier Reef Catchment area.⁵

EnvA also notes broader concerns regarding the effectiveness of biodiversity offsets in Australia. Even the previous Federal Environment Minister has acknowledged that “We know the current offset arrangements are broken and making nature worse.”⁶ This reinforces the need for strict application of the EPBC Act Environmental Offsets Policy and a precautionary approach to habitat loss.

For this project, the Proponent has only proposed to offset the loss of ornamental snake habitat and has disregarded the impact to other threatened species and communities. We again reiterate that the Project will also impact on other threatened species and communities which should also be considered for offset requirements.

It is essential that the avoidance of impact - not offsetting - remains the priority. Offsets should only ever be used as a last resort.

The Project will result in the loss and fragmentation of habitat for multiple endangered and vulnerable species within an already heavily cleared bioregion. The proposed offset fails to meet key EPBC Act Environmental Offsets Policy tests, including additionality, enduring protection, and delivery of a genuine conservation gain.

Given the cumulative ecological losses, the limited effectiveness of offsets in highly cleared landscapes, and the availability of alternatives that avoid further habitat destruction, EnvA considers the impacts of this Project are unacceptable. EnvA therefore recommends that the Project be refused.

⁵ [DCCEEW \(2026\) Updates to agricultural action exemptions under the EPBC Act](#)

⁶ [The Guardian \(2024\) A third of land set aside for restoration in worse state than before, Australian offset audit finds.](#)

Significant Impact on Water Resources

Surface water

The Proponent has identified the potential to impact surface water resources through the diversion of drainage features, creation of new temporary and permanent landforms with potential to affect flood waters and through release of water to the surrounding environment.

Specifically, the Proponent has identified “potential” impacts to:

- The Phillips Creek alluvium, which the Project will reduce the drainage systems and potentially alter creek geomorphology and flow characteristics, and
- Impact on the surface water yield of 221ha of the catchment areas of One Mile, Southern, Phillips and Boomerang creeks and the Isaac River.

The Proponent also claims that surface water quality impacts will be limited as mine affected waters will be contained within the existing water management system. However, the Proponent also notes that the existing water management system may spill in extreme rainfall events.

Just in the last wet season, there were at least five mine affected water (MAW) releases from the Saraji Coal mine as summarised in Table 1.

Table 1. Coal mine water releases from the Saraji Coal Mine (January – March 2026)

Release dates	Receiving water	Release volume (L/s)	Receiving water flow (L/s)	Release salinity (µS)	Receiving salinity (µS)
13/01/2026 -17/01/2026	One Mile Creek	250	4890	225	473
17/01/2026 - 6/02/2026	Phillips Creek	400	4870	2018	546
23/01/2026 - 6/02/2026	Hughes Creek	100	2070	1298	747
20/02/2026 - 14/03/2026	Hughes Creek	600	1990	1707	940
20/02/2026 - 14/03/2026	Phillips Creek	100	3450	3748	983

When calculated, this equates to the release of over 2,000 megalitres of polluted water into the local waterways – or over 860 Olympic-sized swimming pools. In most cases the salinity of the releasing water was significantly higher than the receiving water.

EnvA notes that the water releases after 17 January 2026 were not compliant with their Environmental Authority conditions and were undertaken under Temporary emission licences issued by the Queensland government.⁷

The repeated reliance on Temporary Emission Licences demonstrates that exceedances and emergency releases are not isolated or exceptional events but are becoming an increasingly routine feature of coal mine water management during major rainfall events.

As the climate change induced severe weather events become more frequent, EnvA considers that these heavy rainfall events are likely to become more frequent and mine water releases into the Great Barrier Reef catchment will also become more frequent.

Additionally, the Proponent notes that turbidity, dissolved oxygen, suspended solids, iron and magnesium consistently already exceed the water quality objectives under the *Environmental Protection (Water and Wetland Biodiversity) Policy 2019*.

EnvA considers that any additions of MAW pollution presents a significant impact to water quality in the largest catchment flowing to the Great Barrier Reef. We reject the Proponent’s assertion that “the Project will not result in a significant impact on surface water resources”.

⁷ Queensland Government (2026). Temporary Emissions Licences [TEL101015651](#) and [TEL101015656](#)

Groundwater

The Proponent notes that the Project has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent hydro-stratigraphic units due to changes in hydraulic gradients.

Potential impacts to groundwater resources may include:

- Reduction in groundwaters and availability for use including ecological, stock watering, and mine water extraction.
- Long term impacts associated with ongoing final void pit water evaporation.
- Blending and water deterioration due to evaporation from the final proposed action void.

The Proponent argues that the current groundwater already has high salinity levels and any additional impacts from dewatering and the final void will be negligible. The Proponent also notes that the predicted cumulative drawdown impacts are not directly related to the project but result from existing coal mining activities.

EnvA submits that this Project will add to the cumulative impacts on groundwater in the catchment and that the impacts on ground water from the proposed residual void must be considered as significant.

Significant impact of Greenhouse Gas (GHG) emissions on MNES

The proposed Project would extend the life of the mine from 2025 until 2055 which will result in a further 30 years of additional greenhouse gas emissions.

The GHG emissions, both annually and over the life of the mine from the Project are estimated to be significant, although the preliminary documentation does not provide a meaningful assessment of the Project's estimated Scope 1, Scope 2, or downstream Scope 3 greenhouse gas emissions, nor any detailed mitigation pathway consistent with Australia's emissions reduction commitments.

Climate change is already recognised as a key threatening process for many MNES, including the Great Barrier Reef, koalas, and threatened ecological communities identified within the Project area. The Project's direct and indirect greenhouse gas emissions would contribute to these cumulative impacts.

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.

It is also unclear on how the additional emissions will be mitigated or reduced to meet Australia's and Queensland's emission reduction targets or align with requirements under the Safeguard Mechanism. The materials provided do not include any information on estimates of greenhouse gas emissions, any mitigation measures, nor how the project can meet the safeguard mechanism requirements.

Project justification

There is no convincing justification for this project.

Rapid reductions in CO²-e emissions from the coal and steel industry are critical to meeting the Paris agreement targets. For example, the International Energy Agency notes that CO²-e emissions

from steel must reduce by 1.8GtCO₂ by 2030 and 0.2GtCO₂ by 2050⁸. As carbon capture and storage technology fails to deliver⁹, these reduction targets can only be achieved by switching from coal to renewable energy sources.

The Proponent details the economic benefits of employment, export earnings, government revenue, and using the resource opportunity available, but it does not address the costs of the environmental and social impacts. The recovery from climate-related weather events is becoming increasingly costly to government and the community. In addition, the impacts on our iconic wildlife (like the koala) and special places (like the Reef) will impact on tourism revenue hence a significant component of our regional economy.

We understand that the Proponent is a major 'player' in the fossil fuel industry, but this should not exempt them from environmental and social scrutiny of proposed projects that will impact on environmental and social values.

EnvA considers that this is a clearly unacceptable Project at a time when the world is needing and wanting to transition to a clean energy future, there are sufficient coal resources already approved to supply the domestic and international demand, and the desperate need to reduce emissions and slow the impacts of climate change.

EnvA is concerned that the consultation period of only ten days was inadequate given the scale and complexity of the Project documentation, which included more than twenty technical documents and several hundred pages of material. Such limited timeframes undermine meaningful public participation in environmental decision-making.

In summary, the Project would result in the continued expansion of coal mining within an already heavily impacted region, causing further loss of threatened species habitat, additional pressure on surface and groundwater resources, and significant ongoing greenhouse gas emissions over several decades. The proposed offsets do not adequately compensate for these impacts, and the preliminary documentation fails to demonstrate that the Project can avoid significant impacts on MNES.

For these reasons, EnvA respectfully submits that the Project should be refused under the EPBC Act. Thank you again for the opportunity to make comment on this proposal.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland

⁸ [NetZeroBy2050-A Roadmap for the Global Energy Sector](#)

⁹ [Net Zero Roadmap: A global pathway to keep the 1.5°C goal in reach](#)