Coal Assessment Hub

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20 July 2026

RE: Submission – Daunia West Infrastructure Project: Mining lease, Environmental Authority and Progressive Rehabilitation and Closure Plan

Thank you for the opportunity to make this submission in response to the proposed major amendment to the Daunia Environmental Authority (**EA**)**:** P-EA-100658735 and Progressive Rehabilitation and Closure Plan (**PRCP**): P-PRCP-1008445331 (**Project**), under the *Environmental Protection Act 1994* (**EP Act**) and the Mining Lease Application (**MLA**) No 700085 under the Mineral Resources Act 1989 (**MR 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 increased 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

Whitehaven Daunia Pty Ltd (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 (**DCM**), 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 MLA 700085 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 – RECOMMENDATIONS

EnvA submits that the proposed Environmental Authority amendment, Progressive Rehabilitation and Closure Plan and Mining Lease Application should all be refused because the Project fails to satisfy the standard criteria under the *Environmental Protection Act 1994* (**EP Act**), is inconsistent with the objectives of the *Mineral Resources Act 1989* (**MR Act**), and presents unacceptable environmental risks that have not been adequately avoided, mitigated or assessed.

Our reasoning is in relation to:

- the significant direct and cumulative impacts on Matters of State Environmental Significance (**MSES**),
- unresolved impacts on Matters of National Environmental Significance (**MNES**) that remain subject to assessment under the EPBC Act,
- inadequate avoidance, mitigation, rehabilitation and offset measures,
- inconsistency with the principles of ecologically sustainable development, and
- failure to demonstrate that the Project is in the public interest.

Further background to our submission is provided below.

GROUNDS FOR SUBMISSION

Approval process

EnvA notes that the Proponent has submitted the Project for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**). It was determined that the Project (EPBC 2026/10427) is likely to impact on and Matters of National Environmental Significance (**MNES**) and hence was identified as a controlled action that would require preliminary documentation assessment and approval under the EPBC Act.[1] The controlling provisions identified were:

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

At the time of preparing this submission, the EPBC assessment process has not been completed. If the Project proceeds without approval under the EPBC Act, the taking of that action would contravene Part 3 of the EPBC Act.

EnvA considers that the Proponent has presented this Project to Department of Environment, Tourism Science and Innovation (**DETSI**) to obtain approval of an amendment to EA00561913, PRCP plan P-PRCP-1008445331 and the Department of Natural Resources and Mines, Manufacturing and Regional and Rural Development (**DNRM**) MLA 700085 prematurely.

Until the Commonwealth has completed its assessment and determined appropriate avoidance, mitigation and offset requirements, Queensland decision-makers cannot be satisfied that the environmental impacts of the Project have been adequately identified or managed. Determining the State approvals before completion of the Commonwealth assessment risks inconsistent outcomes and undermines integrated environmental assessment.

Justification

The Proponent claims that "the existing operations at DCM play a fundamental role in creating employment opportunities within the local and regional communities, which in turn, increases

[1] DCCEW (21 April 2026) Referral decision and assessment approach

regional prosperity and domestic productivity. The local and regional community has established itself to service the existing mining complex, and is therefore accustomed to the benefits, costs and demands associated with the mining operations undertaken at DNM."

In relation to the mitigation hierarchy, the Proponent states that is has sought to minimise impacts by avoiding clearing along the banks of the Isaac River where practicable and reducing the original project footprint. The proposed footprint of 386 ha appears to be excessive for the

EnvA questions this justification as the Project will impact on many MSES and contribute further to greenhouse gas emissions. There is a lack of detail on the cost-benefits of the Project using the ecologically sustainable develop framework that balances economy, nature and society.

In support of this, the Institute for Energy Economics and Financial Analysis (**IEEFA**) has concluded that Australia does not need to approve more coal mines to increase coal production, the pipeline of proposed coal mine approvals contrasts with global market outlooks and that approving new and expanding coal mines increases rehabilitation uncertainty and risks to taxpayers.[2]

Scientists have also questioned whether coal mine expansion benefits local communities in the long run and determined that coal mining is a less desirable option when the social and environmental costs are factored into the justification.[3] This is reinforced by the many small Central Queensland coal companies falling into administration and larger companies placing mining operations into care and maintenance.[4]

The standard criteria require consideration of the principles of ecologically sustainable development, including the precautionary principle, intergenerational equity, conservation of biological diversity and ecological integrity, and improved valuation of environmental assets. Given the acknowledged uncertainty regarding threatened species, groundwater impacts and cumulative effects, the precautionary principle weighs strongly against approval.

Collectively, these matters demonstrate that the Project has not established a compelling public interest case sufficient to outweigh the significant environmental risks and uncertainty associated with the proposal.

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. [5]

The Proponent acknowledges that non-detection does not equate to absence. Accordingly, the absence of recorded observations should not be relied upon to conclude that threatened species are absent from the Project Area.

EnvA submits that incomplete survey effort creates material uncertainty regarding:

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

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.

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[2] IEEFA (11 February 2025) Australia's coal production limits far exceed actual output, so why approve new mine developments?

[3] De Valck, J *et al*. (2021) Does coal mining benefit local communities in the long run? A sustainability perspective on regional Queensland, Australia. Science Direct

[4] EnvA (2026) Central Queensland coal company Vitrinite enters administration as sector instability deepens

[5] STR (November 2025) Whitehaven Coal Limited: Terrestrial Ecology Assessment Report

Given that there have been no further surveys since EnvA made comment on the referral of the Project for EPBC assessment, we rely on the detail provided in our previous submission on this Project.[6]

Our previous submission notes that the Project will impact on:

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).[1]

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[7], particularly in relation to:

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

Koala (*Phascolarctos cinereus*)

The koala was reclassified as 'Endangered' in Qld, 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.

Collectively, these impacts demonstrate that the Project contributes to the continuing incremental decline of threatened species across the northern Bowen Basin. While each individual clearing proposal may appear modest, cumulative habitat loss is precisely the process driving species decline in the region.

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 DCM 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.

[6] EnvA (March 2026) : Submission on Referral: Daunia Coal Mine – West Infrastructure Project (EPBC 2026/10427)

[7] DCCEEW (2021) Significant Impact Guidelines 1.1 - Matters of National Environmental Significance

Specifically, 78.8% of vegetation cover has already been cleared in Isaac-Comet Downs subregion which means that any further habitat loss or disturbance is likely to result in significant impact on threatened species and ecosystems.[8]

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[9] 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.[10]

Surface water

The Project proposes to increase the water storages from 12 to 16 (Table 5.1).[4] 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.

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 DCM 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 DCM continues to release contaminated coal mine water into the Isaac River. Records show that the mine released water from RP1 at DCM 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.

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

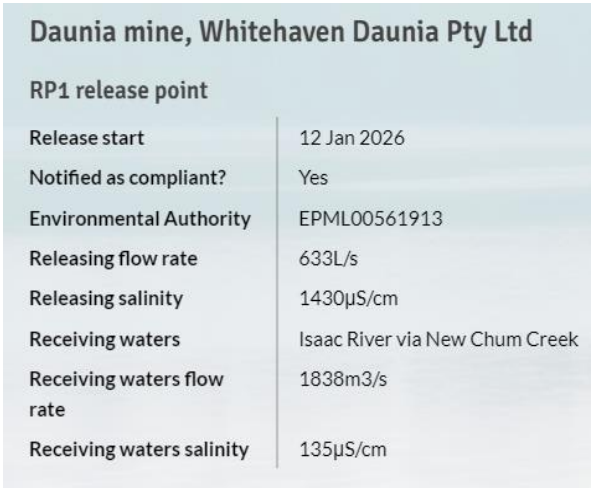
[9] Australian Government (2022) National Recovery Plan for the Koala Phascolarctos cinereus (combined populations of Queensland, New South Wales and the Australian Capital Territory)

[10] WRM (17 November 2025) Daunia West Infrastructure Project. Surface Water Assessment

Daunia mine, BHP Coal

RP1 release point

Release start	31 Mar 2025
Notified as compliant?	Yes
Environmental Authority	EPML00561913
Releasing flow rate	400L/s
Releasing salinity	2260µS/cm
Receiving waters	Isaac River via New Chum Creek
Receiving waters flow rate	125m3/s
Receiving waters salinity	285µS/cm



Daunia mine, Whitehaven Daunia Pty Ltd

RP1 release point

Release start	12 Jan 2026
Notified as compliant?	Yes
Environmental Authority	EPML00561913
Releasing flow rate	633L/s
Releasing salinity	1430µS/cm
Receiving waters	Isaac River via New Chum Creek
Receiving waters flow rate	1838m3/s
Receiving waters salinity	135µS/cm

DCM 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.[11]

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.

Groundwater dependent ecosystems (GDEs)

The Proponent identifies potential impacts on groundwater resources through:

- Changes to shallow groundwater through increasing recharge,
- Impacts on private water supply bores,
- Groundwater dependent ecosystems,
- Groundwater quality, and
- Final void lakes.[12]

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.[13]

Greenhouse gas emissions

The estimated greenhouse gas (**GHG**) emissions for the Project provided are not consistent with the GHG emission guideline which specifies that the information required for a site-specific application is to be limited '*only to the extent they relate to the proposed amendment*'.

EnvA notes that no new coal extraction is proposed as part of the Project and hence GHG emissions and will not result in any changes in emissions. This appears to contradict the purpose

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

[12] SLR (1 December 2025). Daunia West Infrastructure Project. Groundwater Impact Assessment

[13] Whitehaven Daunia (2026) Referral application

and justification of the Project which will enable the extraction of a further 6.5 Mt of ROM coal per annum until 2040 – that is likely to be over 103Mt over the life of the mine.

Despite this, the Proponent claims that the Project will provide a reduction in emissions and it is unclear on how this claim has been formulated.

EnvA considers that the Project is a necessary enabling component of continued fossil fuel production and the associated greenhouse gas emissions, which should be fully quantified and assessed as part of the application.

Human Rights

Under the *Human Rights Act 2019*, decision-makers must give proper consideration to relevant human rights. Continued loss of biodiversity, degradation of water resources and increased greenhouse gas emissions have implications for the rights of future generations, including the right to life, the cultural rights of First Nations peoples and property rights. These matters should weigh against approval.

Conclusion

For the reasons outlined above, EnvA submits that the proposed amendments to the Environmental Authority and Progressive Rehabilitation and Closure Plan, together with Mining Lease Application MLA700085, should be refused.

The Project has not demonstrated that its environmental impacts can be adequately avoided, mitigated or rehabilitated, nor has it established that the public benefits outweigh the significant environmental risks.

Approval would further contribute to cumulative habitat loss, declining water quality within the Fitzroy Basin and continued greenhouse gas emissions at a time when both Queensland and Australia have committed to stronger environmental protection and emissions reduction.

Thank you again for the opportunity to make comments on the Daunia West Infrastructure major Project.

Yours sincerely,

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Director
Environmental Advocacy in Central Queensland