

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

13 July 2026

Dear Minister,

RE: Submission on Referral – Grosvenor Mine – Additional Drainage & Ventilation Surface Disturbance (EPBC 2026/10496)

Thank you for the opportunity to make this submission in response to the referral of the Grosvenor Mine – Additional Drainage & Ventilation Surface Disturbance (**Project**) proposed by Anglo Coal (Moranbah North Management) Pty Limited (**Proponent**), under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*.

Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (EnvA) is a Central Queensland community organisation concerned about the environmental and social risks associated with coal mining, coal seam gas and climate change, particularly the impacts on threatened species, water resources, biodiversity and greenhouse gas emissions.

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 proposing to install enhanced and updated gas drainage and ventilation practices which are essential to the safety of underground longwall mining operations across mining leases (**ML**) ML70378 in response to evolving safety obligations that have arisen since the approval of the Grosvenor Coal Mine.

The project area is approximately 9,211 hectares (**ha**) located about 7km north of Moranbah, Central Queensland. The referral does not clearly define the maximum disturbance footprint for the proposed action, instead retaining flexibility across the broader project area. This creates uncertainty regarding the extent of impacts on Matters of National Environmental Significance



(MNES) and makes it difficult for decision-makers to properly assess the significance of the proposed action.

The land use within the Proposed Action Area includes coal mining, third-party gas extraction, cattle grazing and third-party infrastructure / activities (e.g. the existing Aurizon Network rail corridor).

ENVA'S SUBMISSION

1. EnvA recommends that the Minister decides that this project will have **clearly unacceptable impacts on MNES**, most notably the direct impact on Listed threatened species and communities (ss 18 and 18A).
2. In the alternative, EnvA recommends that this Project is confirmed as a controlled action due to significant residual impacts on MNES including:
 - (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).
3. EnvA submits that the Moranbah North Mine – Additional Drainage & Ventilation Surface Disturbance (EPBC 2026/10495)¹ and this project are interdependent and should be assessed together in determining the referral decision.
4. EnvA further recommends that the Proponent appropriately assesses the greenhouse gas emissions from the Project and provides detail on how these emissions align with the requirements under the Safeguard Mechanism.

Further background to our submission is provided below.

GROUNDINGS FOR SUBMISSION

Threatened species and communities

EnvA notes that the Proponent has already stated that this Project will be a controlled action² with significant impacts to:

- 5.9 ha of Brigalow (*Acacia harpophylla* dominant and co-dominant) TEC,
- 590.8 ha of koala habitat (*Phascolarctos cinereus*: endangered),
- 110.5 ha of greater glider (Southern and Central) habitat,
- 306.9 ha of squatter Pigeon (Southern) habitat (*Geophaps scripta scripta*: vulnerable), and
- 38.8 ha of Ornamental Snake habitat (*Denisonia maculata*: vulnerable).

EnvA notes that these species are regularly identified in applications for new and expanding coal mines in Central Queensland. The conservation status of some of these species and communities has declined in the last few years.

The pre-clearing cover for the Isaac-Comet Downs subregion is estimated at approximately 2,693,397 ha compared to 570,968 ha that remains.³ Therefore, 78.8% of vegetation cover has

¹ [EnvA \(July 2026\) Submission on the Moranbah North Mine – Additional Drainage & Ventilation Surface Disturbance referral \(EPBC 2026/10495\)](#)

² [Anglo Coal \(Moranbah North Management\) \(2026\) Referral application 03419 for Grosvenor Mine – Additional Drainage & Ventilation Surface Disturbance Project](#)

³ [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.](#)

already been cleared in this Brigalow Belt subregion which means that any further habitat loss or disturbance is likely to result in significant impact on threatened species and ecosystems.

There are also additional new and expanding coal projects proposed within the Bowen Basin that will further impact threatened species and communities in the broader Central Queensland region. The loss of threatened species habitat from this Project must be considered significant as the cumulative loss is leading to the further decline of their conservation status.

EnvA therefore considers the impact of further loss may result in an irreversible impact on threatened species and communities and recommend that the Project be refused on the basis of unacceptable impacts on these species and communities.

Migratory species

The Proponent has noted that there will be impacts on migratory species including:

- 9,211 ha of fork-tailed swift foraging habitat (*Apus pacificus*)
- 2.4 ha of glossy ibis habitat (*Plegadis falcinellus*); and
- 116.2 ha of oriental cuckoo habitat (*Cuculus optatus*).

However, the Proponent considers that the impacts “are not likely” to be significant and hence migratory species should not be a controlling provision.

EnvA considers that the precautionary principle under s 3A(b) of the EPBC Act requires that lack of full scientific certainty must not be used as a reason to postpone measures to prevent environmental degradation.

EnvA recommends that the Proponent must be required to provide a more compelling argument as to how the Project will not result in a significant residual impact on migratory species and that listed migratory species (ss 20 and 20A) are included as a controlling provision to enable a more thorough and detailed assessment.

Water Resources

The Proponent acknowledges that the Project involves additional gas drainage and surface disturbance but has relied on previous water resource assessments to conclude that this Project “is not expected to result in a significant impact on water resources.”

However, the Terrestrial Ecology information⁴ submitted with the referral identifies alteration of surface water flows and risk of erosion and sedimentation as a threat.

EnvA further notes the Proponent’s claim that aquatic and terrestrial ecosystems mapped near watercourses are not considered to be groundwater dependent under EPBC significance criteria, but may meet the criteria under the Queensland’s environmental legislation (for example, *Eucalyptus populnea* woodland on alluvial plains, *Corymbia* spp. open woodland on alluvial plains and *Eucalyptus tereticornis* or *E. camaldulensis* woodland fringing drainage lines).

The water resource assessment⁵ was largely based on previous assessments and modelling. Previous groundwater modelling may no longer adequately reflect changing climatic conditions, cumulative mining activities, or evolving scientific understanding. Independent review through the Independent Expert Scientific Committee (IESC) is therefore necessary.

EnvA considers that water resources should be a controlling provision, and the IESC is asked for specific advice on:

⁴ [ERM \(April 2026\) Attachment 1. Terrestrial and Aquatic Ecology – MNES Impact Assessment Report](#)

⁵ [Klohn Crippen Berger \(April 2026\) Attachment 3. Grosvenor Mine Groundwater Impact Assessment](#)

- The extent to which decision-makers have confidence in the predictions on water resources provided in the referral documentation,
- the adequacy of the modelling used,
- the appropriateness of the conceptualisation, and
- has the appropriate sensitivity and uncertainty analyses been undertaken, including in consideration of climate change effects.

EnvA recommends that the Minister decides that the precautionary principle is invoked, and Water resources (ss 24D and 24E) are considered a controlling provision to allow for a more informed assessment that can be confirmed through the IESC process.

Greenhouse Gas (GHG) emissions

Despite the request for information on the GHG emissions associated with the Project, and the Proponent's claim that the Project does not include mining operations, activities or disturbance authorised by the Grosvenor G100s Project Approval (EPBC 2007/3785) and Grosvenor G200s Project Approval (EPBC 2016/7796), the emissions estimates provided are expressed as changes to emissions from the associated current operations.⁶

The principal purpose of the Project is to facilitate gas drainage and ventilation associated with underground coal mining. Accordingly, methane emissions are not merely an incidental consequence of the Project but are intrinsically linked to the proposed action and should therefore be comprehensively assessed.

Additional gas drainage and ventilation will release methane during the construction and operational phase of the Project which have not been estimated. Without project-specific emissions estimates, neither the Minister nor the public can properly assess the significance of the Project's greenhouse gas emissions.

Further to this, there is no information on how the released gases will be managed (for example through flaring or capture) or any decarbonisation proposals. The referral only provides information on what is occurring at the Grosvenor Coal mine and existing NGER reporting.

It appears that the Proponent will continue to largely be reliant on the purchase of Australian Carbon Credit Units (**ACCUs**) to mitigate its emissions and meet its Safeguard Mechanism compliance obligations.

EnvA submits that the Minister cannot reasonably approve this Project without being satisfied that it is compatible with the Safeguard Mechanism and Australia's legislated emissions reduction targets. If the Project cannot demonstrate compatibility with the Safeguard Mechanism, it will undermine Australia meeting commitments such as:

- The Paris Agreement⁷
- Legislated emission reduction targets⁸ and interim targets⁹,
- Belem Declaration on the Transition away from fossil fuels¹⁰, and the
- Global Methane Pledge.¹¹

⁶ [Anglo American \(June 2026\). Appendix 5. Response to Greenhouse Gas Emissions RFI: Grosvenor Mine – Additional Drainage & Ventilation Surface Disturbance](#)

⁷ [The Paris Agreement](#)

⁸ [Climate Change Act 2022](#)

⁹ [Australian Government \(2025\) Setting our 2035 target and path to net zero](#)

¹⁰ [Australia joins Belém Declaration to transition from fossil fuels](#)

¹¹ [Global Methane Pledge](#)

Heavy reliance on ACCUs should not be regarded as a substitute for direct emissions reduction at the source, particularly where opportunities may exist to capture or destroy methane emissions associated with the Project.

Conclusion

Given the acknowledged impacts on threatened species and ecological communities, the uncertainty surrounding the extent of disturbance, unresolved questions regarding water resources and greenhouse gas emissions, and the cumulative impacts of continued coal mine expansion across the Bowen Basin, EnvA submits that the precautionary principle requires the Minister to refuse the Project or, at minimum, subject it to comprehensive assessment under all relevant controlling provisions.

Approval of this Project would be inconsistent with the objects of the EPBC Act, the principles of ecologically sustainable development, and Australia's international climate and biodiversity commitments.

Thank you again for the opportunity to make comments on the Grosvenor Mine – Additional Drainage and Ventilation Surface Disturbance Project referral for assessment under the EPBC Act.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland