

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

12 July 2026

Dear Minister,

RE: Submission on Referral – Moranbah North Mine Extension – Additional Drainage & Ventilation Surface Disturbance (EPBC 2026/10495)

Thank you for the opportunity to make this submission in response to the referral of the Moranbah North Mine Extension – 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 lease (ML) ML70042 in response to evolving safety obligations that have arisen since the approval of the Moranbah North Coal Mine.

The Proponent is also proposing an extension of the longwall panels into the northern portion of the neighbouring Grosvenor Coal Mine on ML 70378 to access an additional 11.12 MT of ROM coal and 7.02 Mt of product coal.



The project area is approximately 3,668 hectares (ha) located about 15 km north of Moranbah, Central Queensland. The referral does not clearly identify 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).

Relationship between Grosvenor Coal Mine referral (EPBC 2026/10496) and the Project

The Proponent states that it is progressing these projects to improve safety concerns through gaining approval for the safe release of gases from these two underground coal mines. Grosvenor Coal mine experienced an underground explosion in May 2020 which seriously injured five people¹ and then another explosion and significant underground fire in June 2024 which forced the closure of the mine with resumed mining operations expected in 2027.² Moranbah North Coal mine was also suspended in 2025 due to dangerous levels of carbon monoxide. These incidents demonstrate the importance of mine safety but do not, in themselves, justify approval of additional environmental impacts without proper assessment.

Anglo American, the owner of the subsidiary Anglo Coal (Moranbah North Management) is also in the process of selling its steelmaking coal mines, including Grosvenor and Moranbah North coal mines.³ It is unclear on whether the current proposals are part of the conditions of the sale.

The proposed extension of longwall panels into the Grosvenor mining lease demonstrates that the two referrals are operationally and functionally interdependent. The gas drainage infrastructure, ventilation arrangements and mining extension are intended to operate as an integrated system. Assessing the referrals separately risks artificially dividing the environmental impacts of what is effectively a single mining proposal.

The project area for these projects together exceeds 12,800 ha and impacts on large areas of threatened species habitat. We therefore recommend that for the purposes of an EPBC assessment, that they be considered together.

Justification

There is no justification provided as to why such a large area is required to meet safety requirements for gas ventilation. Further detail is required to justify the extent of the project area.

EnvA does not dispute the need for mine safety measures, but questions why those safety measures are being used to facilitate additional coal extraction and expanded disturbance.

In relation to the extension of the longwall mine, the justification provided “is that not proceeding would sterilise the coal resource and reduce the length of employment of staff and contractors”.

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

¹ [Australasian Mine Safety Journal \(15 July 2020\) Anglo updates on internal Grosvenor underground explosion investigation](#)

² [ABC \(June 2025\) Anglo American close to reopening Grosvenor Coal Mine one year after explosion](#)

³ [Anglo American \(18 May 2026\) Anglo American agrees sale of steelmaking coal business for up to US\\$3.875 billion in cash](#)

mine approvals contrasts with global market outlooks and that approving new and expanding coal mines increases rehabilitation uncertainty and risks to taxpayers.⁴

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.⁵ This is reinforced by the many small Central Queensland coal companies falling into administration and larger companies placing mining operations into care and maintenance⁶ or divesting their interests.³

The Proponent has not presented a suitable justification for the Project - the significant environmental and social impacts must be considered.

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 Grosvenor Mine – Additional Drainage & Ventilation Surface Disturbance (EPBC 2026/10496)⁷ 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 action⁸ with significant impacts to:

- 12.5 ha of Brigalow (*Acacia harpophylla* dominant and co-dominant)TEC,
- 174.9 ha of koala habitat (*Phascolarctos cinereus*: endangered),
- 10 ha of greater glider (Southern and Central) habitat (*Petauroides volans*: endangered),
- 136.2 ha of squatter Pigeon (Southern) habitat (*Geophaps scripta scripta*: vulnerable), and
- 3.7 ha of Australian painted snipe habitat (*Rostratula australis*: endangered).

⁴ [IEEFA \(11 February 2025\) Australia's coal production limits far exceed actual output, so why approve new mine developments?](#)

⁵ [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](#)

⁶ [EnvA \(2026\) Central Queensland coal company Vitrinite enters administration as sector instability deepens](#)

⁷ EnvA (July 2026) Submission on the Grosvenor Mine – Additional Drainage & Ventilation Surface Disturbance referral (EPBC 2026/10496)

⁸ [Anglo Coal \(Moranbah North Management\) \(2026\) Referral application 03402 for Moranbah North Mine Extension – Additional Drainage & Ventilation Surface Disturbance Project](#)

The terrestrial ecology⁹ report also identifies that there may be impacts on the ornamental snake. EnvA notes that many of 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.

As noted by the Proponent, these impacts occur within a landscape that has been substantially modified by historic agricultural practices, CSG activities, industrial activities, existing mining activities and other approved disturbance.

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.¹⁰ Therefore, 78.8% of vegetation cover has 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.

The Proponent considers that the proposed impacts in a disturbed landscape are “expected to be localised and incremental rather than introducing new or regionally significant impact pathways” which fails to properly acknowledge the cumulative impacts on threatened species and ecosystems.

Given the already extensive historical clearing within the Brigalow Belt and the declining conservation status of several listed species, even relatively small additional habitat losses may contribute to a significant impact when considered in the context of cumulative regional decline.

EnvA considers the impact of further loss of habitat may result in an irreversible impact on threatened species and communities and result in a further decline in the conservation status of many Central Queensland species and communities. As such, we strongly recommend that the Project be refused on the basis of unacceptable impacts on threatened species and communities.

Migratory species

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

- 3,668 ha of fork-tailed swift foraging habitat (*Apus pacificus*), and
- 3.7 ha of glossy ibis habitat (*Plegadis falcinellus*).

However, the Proponent considers that the impacts “is unlikely” 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.

⁹ [ERM \(April 2026\) Attachment 1. Terrestrial and aquatic ecology report – MNES assessment report](#)

¹⁰ [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.](#)

Water Resources

The Proponent acknowledges that the Project involves additional gas drainage, surface disturbance and an extension of the longwall mine. There is also acknowledgement that the groundwater modelling suggests that the Project will result in additional drawdown in the coal measures. However, the modelling concludes that this Project “is not expected to result in a significant impact on water resources.”

The water resource assessment¹¹ modelling was largely based on previous assessments and reports. The report notes that the groundwater table has been significantly altered by surrounding mines and gas production bores, however there is no assessment of the cumulative impact incorporating all the surrounding mines. The cumulative assessment was based on the current Moranbah North and Grosvenor mines and concludes that the additional drawdown of up to 45 m to be relatively small in relation to the already approved mine plan.

There is little detailed information on the impacts of the Project on surface water other than to note that the existing water management for the Moranbah and Grosvenor mines have been assessed and approved. The impacts of subsidence from the proposed longwall mine on surface water or terrestrial ecology are purely dismissed as not expected to result in significant impacts.

Previous assessments and approvals may no longer adequately reflect changing climatic conditions, cumulative mining activities, or evolving scientific understanding. Independent review of the potential impacts on water resources 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 the:

- extent to which decision-makers have confidence in the predictions of changes to water resources as provided in the referral documentation,
- adequacy of the groundwater modelling used,
- potential surface and ground water impacts occurring through the additional subsidence, and
- sensitivity and uncertainty analyses that has 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 Moranbah North Extension approval (EPB 2018/8338) or the Grosvenor G100s Project Approval (EPBC 2007/3785), the emissions estimates provided are expressed as changes to emissions from the associated current operations.¹²

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.

¹¹ [Klohn Crippen Berger \(April 2026\) Attachment 4. Moranbah North Mine 100s Longwall Series Extension Groundwater Impact Assessment](#)

¹² [Anglo American \(June 2026\). Appendix 6. Response to Greenhouse Gas Emissions RFI: Moranbah North Mine Extension – Additional Drainage & Ventilation Surface Disturbance](#)

Additional gas drainage and ventilation will release methane during the construction and operational phases 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 existing Moranbah North coal mine and existing NGER reporting.

The Project also intends to extend the longwall mine to extract 11.12 MT of ROM coal and 7.02 Mt of product coal for export. It is unclear if the emissions from the coal mining have been incorporated into the “changes to emissions” from the current operations, nor the estimated emissions from the Project and how these can meet the Safeguard Mechanism 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 Agreement¹³
- Legislated emission reduction targets¹⁴ and interim targets¹⁵,
- Belem Declaration on the Transition away from fossil fuels¹⁶, and the
- Global Methane Pledge.¹⁷

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 Moranbah North 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

¹³ [The Paris Agreement](#)

¹⁴ [Climate Change Act 2022](#)

¹⁵ [Australian Government \(2025\) Setting our 2035 target and path to net zero](#)

¹⁶ [Australia joins Belém Declaration to transition from fossil fuels](#)

¹⁷ [Global Methane Pledge](#)