

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

By email: Minister.watt@dcceew.gov.au
epbc.referrals@nationalepa.gov.au

14 August 2026

Dear Minister and the EPBC Referrals Team,

RE: Yarrabee Coal Mine Continuation Project - request referral and assessment under the EPBC Act

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.

We are writing to you regarding the Yarrabee Coal Company Pty Ltd. (**the Proponent**)'s proposed Yarrabee Coal Mine Continuation Project (**the Project**) which would provide for extension and continuation of operations at the Yarrabee Coal Mine near Blackwater in Central Queensland.

The Project

The Yarrabee mine currently operates as an open-cut mine, producing 3Mtpa of ROM coal, yielding 2Mtpa of metallurgical coal. The planned extension will boost the extraction rate to 4Mtpa, averaging 3.8Mtpa over the life of the expansion.

Mining of the expanded areas is expected to begin in 2028. The expansion will cover an additional 2,296 hectares within the existing mining leases. The environmental impacts of the proposed extension is significant.

We further note that the proposed Project is projected to add 10Mt of Scope 1 emissions, 600kt of Scope 2 emissions, and 279Mt of Scope 3 emissions over the life of the extension, adding further environmental and social impacts, and challenging the governments commitments to decreasing greenhouse gas emissions.¹

The approval process

The Proponent is seeking a major amendment to environmental authority (**EA**) EPML00844613 for the expansion of the Yarrabee Coal Mine.

In recognition of the impacts, the Proponent applied to the Queensland Department of Environment, Tourism, Science and Innovation (**DETSI**) for this Project to be assessed under a voluntary EIS process under the *Queensland Environmental Protection Act 1994 (EP Act)*. DETSI approved this request on 28 April 2025.²

¹ [AME \(2025\) Coal Daily Briefing](#)

² [DETSI \(2025\) Proposed Yarrabee Coal Mine Continuation Project—Draft terms of reference](#)



EnvA made a submission³ on the draft terms of reference, noting that the proposed Project is likely to have significant impacts on several Matters of National Environmental Significance (MNES).

Of particular concern, the Proponent's own Initial Advice Statement (IAS) identifies potential impacts on MNES and indicates that the Project would be referred for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The IAS also indicates that the Proponent anticipated that DCCEE would determine the Project to be a controlled action.⁴

Despite this, the Project has not been referred for assessment under the EPBC Act.

Potential impacts on MNES identified in the IAS

The proposed clearing of 2,296 hectares would directly disturb terrestrial and aquatic vegetation and habitat. Of this area, approximately 1,180 hectares comprise areas identified as having high ecological value. Tables 5 and 6 of the IAS identify more than 50 threatened species that may be present within the Project area and potentially affected by the Project.

The IAS also identifies potential impacts on surface and groundwater resources arising from direct disturbance, overland water diversions, coal mine water releases and the creation of temporary and permanent landforms that may affect floodwaters.

Further detailed assessment will be necessary to determine the extent and significance of the impacts on MNES. In EnvA's view, this is precisely the reason why the Project should be referred under the EPBC Act and assessed through the appropriate Commonwealth assessment process.

The Project's potential impacts should also be considered in the context of existing and proposed development across the Fitzroy Basin, the largest catchment draining to the Great Barrier Reef. In particular, the potential effects of additional habitat clearing, changes to surface and groundwater systems and mine water management warrant assessment at a scale that properly considers cumulative impacts.

Request for Ministerial intervention under section 70 of the EPBC Act

Given the scale and severity of the potential impacts on MNES, EnvA respectfully requests that the Minister exercise the power available under section 70⁵ of the EPBC Act to ensure that the Yarrabee Coal Mine Continuation Project is referred for consideration under the EPBC Act as a likely controlled action.

EnvA strongly opposes the Project because of its potential to cause further adverse environmental and social impacts, including significant habitat loss, irreversible land disturbance, impacts on the quality and quantity of surface waters within the Fitzroy Basin, and substantial additional greenhouse gas emissions that will contribute to climate change.

EnvA is particularly concerned that the Proponent's IAS itself identifies the potential for significant impacts on threatened species and ecological communities and on water resources, while also indicating that an EPBC Act referral was anticipated. In these circumstances, EnvA considers that the Project should be referred for assessment under the EPBC Act and assessed through a bilateral or otherwise accredited joint assessment process, rather than proceeding through a voluntary State-based EIS process alone.

³ [EnvA \(2026\) Submission on the Yarrabee Coal Mine Continuation Project Draft Terms of Reference](#)

⁴ [Yancoal \(2025\) Yarrabee Coal Mine Continuation Project - Initial Advice Statement](#)

⁵ [Commonwealth Consolidated Acts. EPBC Act - Section 70 Minister may request referral of proposal](#)

Proceeding with State-level approvals without a corresponding EPBC referral risks:

- duplication of effort for community members, government agencies and the Proponent in reviewing and responding to assessment documentation; and
- fragmentation of assessment between State and Commonwealth processes, making it more difficult to assess the Project's MNES impacts and cumulative impacts in a coordinated manner.

EnvA has also raised these concerns with DETSI but has not received an explanation as to why the Project is proceeding through the State assessment process without an EPBC Act referral or determination at the time of writing this letter.

It is EnvA's view, that allowing the State approval process to proceed without a corresponding EPBC referral risks significant MNES issues being considered only after key State approvals have been determined, rather than through a coordinated assessment process.

We therefore respectfully request that DCCEEW:

1. advise whether the Minister will exercise the power available under section 70 of the EPBC Act in relation to the Yarrabee Coal Mine Continuation Project; and
2. if the Minister does not intend to do so, provide EnvA with the basis on which the Commonwealth considers that the Project does not require referral and assessment under the EPBC Act, notwithstanding the potential MNES impacts identified in the Proponent's IAS.

Thank you for your consideration of this important matter. We would appreciate a response at your earliest convenience given the Project's ongoing State assessment and approval process.

Kind regards,



Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland Inc.