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

16 September 2026

Dear Minister,

RE: Submission on Referral – Ensham Life of Mine Extension 2 (EPBC 2026/10617)

Thank you for the opportunity to make this submission in response to the referral of the Ensham Life of Mine Extension 2 (**the Project**) proposed by Thungela Resources Australia Pty Ltd and Sungela Pty Ltd (**the Proponent**) for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (**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.

ENVA'S SUBMISSION

1. EnvA urges the Minister to determine that this project will have **clearly unacceptable impacts on protected matters**, most notably the direct impact on threatened species and communities, migratory species and water resources.
2. In the alternative, EnvA strongly recommends it be declared a controlled action due to significant residual impacts on:
   - Listed threatened species and communities (ss 18 and 18A),
   - Listed migratory species (ss 20 and 20A), and
   - Water resources (ss 24D and 24E).

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Due to the likely significant impacts on water resources and the increased greenhouse gas emissions which will further impact on MNES, we further recommend that the following controlling provisions are applied to this Project:

- World Heritage (ss 12 and 15A),
- National Heritage (ss 15B and 15C),
- Ramsar Wetlands (ss 16 and 17B),
- Commonwealth marine areas (ss 23 and 24A), and
- Great Barrier Reef Marine Park (ss 24B and 24C).

3. EnvA supports assessment of the Project through an accredited environmental impact statement (**EIS**) process. An EIS assessment would allow:
   - Public input on the terms of reference,
   - Rigorous assessment of species surveys, habitat fragmentation, cumulative impacts, water resources, and climate risks, and
   - Transparency in the evaluation of offsets, mitigation, and alternatives.

Further detail to support our recommendation is provided below.

The proposed action

The Project proposes to extend the life of the underground operations of the Ensham Mine. The Ensham Mine life is currently forecast until 2037. This project proposes to extend the mine life by a further nine years to 2045 at a forecast production rate of up to approximately 6.5 million tonnes per annum (Mtpa), equivalent to approximately 58.5 million tonnes (Mt) of run of mine (**ROM**) coal.[1]

This is the proposed third extension of the Ensham Mine with previous approvals granted for the Expansion of the Ensham Mine (EPBC 2004/1822) and Ensham Life of Mine Extension (EPBC 2020/8669).

The Project is located in the Bowen Basin of central Queensland approximately 35 km east of Emerald and 50 km northwest of Blackwater.

The proposed project area is approximately 19,232 ha including four distinct areas:

- Area 1: located with Mineral Development Licence (MDL) 217 (2,253.7ha),
- Area 2: located within MDL 217 (1,334.5ha),
- Area 3: located within MDL 217 and partially includes existing leases ML 7459 and ML 70366 (9,720.9ha), and
- Area 4: partially includes existing leases ML 7459, ML 7460, ML 70366 and ML 70367 (5,878.1ha).

Areas 1, 2 and 3 will include an extension of underground mining activities using bord and pillar methods, with some surface disturbance for ventilation and gas drainage, access tracks, electrical transmission lines, pipeline drilling and stockpile areas. Area 3 may also include the construction of underground access areas, demountable offices, ablutions, workshop, washdown bay and laydown area.

Area 4 activities include changes to the extent and configuration of underground mining areas, and may also include the construction of underground access areas, demountable offices, ablutions, workshop, washdown bay and laydown area.

[1] Referral application no 0352. Ensham Life of Mine Extension 2

GROUNDS FOR SUBMISSION

Significant impact on threatened species and communities and migratory species

The project will or has the potential to impact on numerous threatened species and communities listed under the EPBC Act. Of note, the Proponent has identified direct or potential impacts on:

- Brigalow (*Acacia harpophylla* dominant and co-dominant) TEC (Endangered)
- Natural Grasslands of the Queensland Central Highlands and northern Fitzroy Basin TEC (Endangered)
- Poplar Box Grassy Woodland on Alluvial Plains TEC (Endangered)
- Weeping Myall Woodlands TEC (Endangered)
- Koala (*Phascolarctos cinereus*) (Endangered)
- Greater glider (*Petauroides volans*) (Endangered)
- Squatter pigeon (*Geophaps scripta scripta* (Vulnerable)
- Australian painted snipe (*Rostratula australis*) (Endangered, Migratory)
- Sharp-tailed sandpiper (*Calidris acuminata*) (Vulnerable, Migratory)
- Fork-tailed swift (*Apus pacificus*) (Vulnerable, Migratory)
- Latham's snipe (*Gallinago hardwickii*) (Vulnerable, Migratory)
- White-throated needletail (*Hirundapus caudacutus*) (Vulnerable, Migratory)
- Glossy ibis (*Plegadis falcinellus*) (Migratory)
- Caspian tern (*Hydroprogne caspia*) (Migratory)
- Marsh Sandpiper (*Tringa stagnatilis*) (Migratory)
- Ornamental snake (*Denisonia maculate*) (Vulnerable)
- Grey Snake (*Hemiaspis damelii*) (Endangered)
- Southern Snapping Turtle (*Elseya albagula*) (Critically Endangered)
- Fitzroy River Turtle (*Rheodytes leukops*) (Endangered)
- Coolabah Bertya (*Bertya opponens*) (Vulnerable)
- Ooline (*Cadellia pentastylis*) (Vulnerable)

EnvA's comments

EnvA notes that only a preliminary ecological assessment has been provided based on a desktop assessment and ecological assessments undertaken in 2019 for the Ensham Life of Mine Extension Project.[2] Given that comprehensive ecological surveys and impact assessments have not yet been completed, the referral documentation does not provide a sufficient evidentiary basis to determine the extent or significance of impacts on listed threatened species and ecological communities or migratory species.

We do note that the same threatened species and communities are regularly identified in coal mine applications in the Bowen Basin. The conservation status of koalas and greater gliders has seen a measurable decline in conservation status over recent years with both species now classified as endangered – demonstrating that the current mitigation measures are inadequate.

The cumulative habitat loss across Central Queensland is driving many of these species toward extinction. The 19,232 ha footprint of this Project will destroy remaining viable habitats, forcing further contraction and fragmentation of already pressured populations.

[2] Aarc (2026) Summary of preliminary ecology assessments undertaken to date in relation to Ensham Life of Mine Extension 2 Project and EPBC Act listed entities

EnvA recommendations

EnvA is of the strongest view that this Project must be refused based on the unacceptable impacts to threatened species and communities from:

- the direct impacts due to the loss of habitat,
- the indirect impacts detailed by the Proponent above,
- the cumulative impacts of the continuing approval of new and expanding coal mines in the Bowen Basin in Central Queensland, and
- the increasing impacts of extreme weather events on these species and communities.

If the project cannot be refused, we strongly recommend that Listed threatened species and communities (ss 18 and 18A), and Listed migratory species (ss 20 and 20A) are included controlling provisions and a full EIS process be required.

This is consistent with the Proponent's conclusion that the Project will be a controlled action as it is likely to have a significant impact on listed threatened species and communities and migratory species.

Significant Impact on Water Resources

Surface water

The Project is located in the Fitzroy River Basin catchment and within the Dawson, Fitzroy, Isaac, Nogoa and Comet River sub-basins. The local waterways include the Winton Creek, Corkscrew Creek and the Nogoa River with some unnamed water courses underlying the Project area.[1]

The Proponent identifies that the potential impacts to surface water may include the physical disturbance of land, runoff from disturbed areas, reduction in catchment area and subsequent potential impacts of the water quality of the drainage paths leading to the catchment.

There are no specific water quality reports to support the application and hence it is impossible to assess the potential impacts of the proposed coal mine expansion. The Proponent acknowledges that the Project is expected to have a significant impact on water resources and that further detailed assessments will be required through a more detailed assessment process.

Groundwater

Again, the Proponent has not provided any details of the impacts on groundwater, but notes that there are likely to be direct impacts on groundwater resources including groundwater drawdown and contaminated groundwater inflow.

The Proponent further acknowledges that there may be further indirect impacts on groundwater dependent ecosystems, agricultural activities that rely on ground water for irrigation or stock watering, recreational or cultural use of water resources and urban water supply.

The extent of the impacts is proposed to be assessed through a more detailed assessment process.

EnvA's comments

There is limited ability to ascertain the significance of the impacts on water resources, GDEs and aquatic ecosystems given the lack of supporting information provided with the referral application. As noted by the Proponent, further monitoring and assessment of the impacts on water resources, GDEs and aquatic ecosystems has yet to be completed.

EnvA recommendations

We concur with the Proponent that the Project is a large-scale coal mining development which is likely to have a significant impact on surface and groundwater, and hence we concur with the Proponent that Water resources (ss 24D and 24E) should be considered as a controlled action.

Given the lack of information provided on water resources, the history of this coal mine in relation to water management, and the ongoing coal mine water resources into the Fitzroy Basin Catchment, we further recommend that this Project has the potential to also impact on the following MNES:

(a) World Heritage (ss 12 and 15A),
(b) National Heritage (ss 15B and 15C),
(c) Ramsar wetlands (ss 16 and 17B),
(d) Commonwealth marine areas (ss 23 and 24A), and
(e) Great Barrier Reef Marine Park (ss 24B and 24C).

Significant impact of Greenhouse Gas (GHG) emissions on MNES

The proposed Project would extend the life of the Ensham Mine by a further nine years, from the currently forecast closure in 2037 to 2045. The GHG emissions, both annually and over the life of the mine from the Project are estimated to be significant.

The scientific evidence demonstrates that limiting global warming requires a rapid reduction in fossil fuel production and consumption.[3]

This proposed Project is for **thermal coal** which is no longer in demand domestically, and there is more than sufficient supply for the export market without expanding the thermal coal extraction in Australia.

The Ensham Life of Mine Extension (EPBC 2020/8669) already provides for the extraction of thermal coal until 2037. Approving a further extension of the coal mine well to operate until 2045 is contrary to meeting Australia's emission reduction targets of 43% by 2030, 62-70% by 2035 and net-zero by 2050.

If Australia is serious about meeting emission reduction targets, there is no sensible reason to continue to allow new or expanding fossil fuel projects. New unnecessary fossil fuel projects place additional onus on emerging and future new-economy industries to make up for the high emissions from the fossil fuel industry.

The GHG Assessment and Abatement plan[4] estimates *"average annual Scope 1 and 2 GHG emissions of 325,114 t CO2-e per year and will therefore be subject to the requirements of the Safeguard Mechanism across all operational years."*

The existing Ensham mine reported emissions of 261,158 t CO2e under the Safeguard Mechanism for the 2024-25 reporting period, below its baseline of 292,941 t CO2e. The proposed Project would see a significant increase in annual scope 1 and 2 emissions reported to NGER under the Safeguard Mechanism.

EnvA also notes that the Ensham Mine has been identified as one of the gassiest thermal coal mines in Australia. Ember's analysis on Australia's coal mine methane specifically identifies that closing the Ensham mine (along with other high-emitting operations like Narrabri, Mandalong, Myuna, and Chain Valley) would cut Australia's total coal mine methane emissions by 9% while reducing coal production by just 2%.[5]

The Proponent notes that the Project is still in the planning stage and specific Scope 1 and 2 targets decarbonisation targets have not yet been established but will align with corporate targets including:

[3] UN Environment Programme, *Production Gap Report 2020* (Report, 2 December 2020)
[4] Katestone (2026) Ensham Extension: Greenhouse Gas Assessment and Abatement Plan
[5] Ember (2022) Australia's coal mines can deliver two-thirds of methane cuts

- Fugitive methane emissions are abated through flaring or beneficial use.
- Energy efficiency is incorporated into operations as practicable
- Available and viable technologies are utilised for Ensham's operations to reduce GHG emissions in alignment with the overall emission objectives.
- Practices and procedures utilised at Ensham seek reduced emission intensity as a priority.
- Waste management practices utilising effective re-use and recycling opportunities where available to reduce waste disposed of to landfill.
- Renewable electricity sources are considered (and where economically feasible) used in substitution for grid purchased electricity to reduce scope 2 emissions.

The poor performance of the Proponent in achieving emission reductions was highlighted in the Queensland Land Court determination of the previous extension of the Ensham Coal Mine proposal.[6] The Land Court President was critical of the lack of implementation of any measures to mitigate greenhouse gas emissions or take any steps to prioritise energy efficiencies. President Stilgoe recommended that the mining lease "not be approved unless and until the applicants show real and significant progress towards mitigating their GHG emissions."

EnvA's comments

These GHGs will significantly contribute to increased global temperatures 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. As global warming increases to 1.5°C and above, these impacts will increase in severity.

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. Approving another coal mine to operate for an additional nine years is irresponsible and contrary to Australia's legislated emissions reduction targets and Australia's commitments under the Paris Agreement.[7]

It is EnvA's view that the Project is contrary to global efforts towards a clean energy future, achieving emission reduction targets and will lead to further impacts on the environment and communities. Approving a nearly 20,000 ha thermal coal project that would operate until 2045 is fundamentally inconsistent with the urgent need to reduce greenhouse gas emissions and limit climate impacts.

EnvA recommendations

EnvA contends that the proposed Project will emit GHGs which will contribute to increased global temperatures and result in adverse impacts to:

(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).
(d) World Heritage (ss 12 and 15A),
(e) National Heritage (ss 15B and 15C),
(f) Ramsar Wetlands (ss 16 and 17B),
(g) Commonwealth marine areas (ss 23 and 24A), and
(h) Great Barrier Reef Marine Park (ss 24B and 24C).

[6] Queensland Land Court (2025) *Re Sungela Pty Ltd & Anor* [2025] QLC 5
[7] The Paris Agreement

Project justification

There is no convincing justification for this project. The Proponent's statement that the existing operations would ramp down to closure in approximately 2037 if the Project does not proceed does not establish a compelling need for the proposed extension. It demonstrates only that the Project is intended to maintain coal mining operations beyond the currently forecast mine life.

This 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 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 coal mine approvals contrasts with global market outlooks and that approving new and expanding coal mines increases rehabilitation uncertainty and risks to taxpayers.[8]

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.[9] This is reinforced by the many small Central Queensland coal companies falling into administration and larger companies placing mining operations into care and maintenance.[10]

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.

The recovery from climate-related weather events is becoming increasingly costly to government and the community. In addition, damage to iconic wildlife and special places such as the Great Barrier Reef has the potential to adversely affect tourism and the broader regional economy.

Collectively, these matters demonstrate that the Project has not established a compelling public interest justification sufficient to outweigh the significant environmental impacts.

Conclusion

Given the clear and unacceptable environmental impacts of the Ensham Mine's third proposed expansion —especially on threatened species, water resources, and impacts arising from greenhouse gas emissions—we strongly urge you to refuse approval of this project. This decision is critical to protecting Central Queensland's biodiversity, water quality, and a safe climate future.

Thank you again for the opportunity to make comments on the Ensham Life of Mine Extension 2 project.

Yours sincerely,

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

[9] 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

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