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27 November 2026

RE: Submission on Blackwater North Extension Project – Environmental Authority Amendment (A-EA-AMD-101083251) and PRCP Schedule Amendment (A-PRCP-AMD-101134173)

Thank you for the opportunity to make this submission in response to the application by Whitehaven Blackwater Pty Ltd (**the Proponent**) to amend the Environmental Authority (**EA**) and Progressive Rehabilitation and Closure Plan (**PRCP**) schedule for the Blackwater North Extension Project (the **Project**).

Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (EnvA) is a Central Queensland community organisation concerned about the 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 and Queensland's emission reduction targets,
- is likely to result in irreparable damage to our local landscape and create stranded assets,
- will put our local communities at further risk of extreme weather, including 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 habitat loss, fragmentation and climate change, and
- rarely adequately consider the views of Traditional Owners and local communities who are concerned about protecting their land from fossil fuel development.

The Project

The Blackwater Mine (**BWM**) is an existing open-cut coal mine located approximately 20 kilometres south-west of Blackwater in the Bowen Basin, Central Queensland.

The Proponent is seeking approval to extend open-cut mining operations into Surface Area 7 on Mining Lease (ML) 1762 and Surface Area 10 on ML1759.

The proposed extension would:

- disturb approximately 2,317 hectares of additional land;
- extract approximately 200 million tonnes of additional run-of-mine (ROM) coal;
- continue production at up to 19 million tonnes per annum;
- extend mining operations to approximately 2055, with commencement anticipated around 2030; and
- utilise existing mine infrastructure, together with additional water management infrastructure, waste rock emplacements and associated facilities.

The Project would substantially extend the operational life of an existing mine and result in significant additional environmental disturbance.

ENVA'S SUBMISSION

EnvA objects to the proposed amendments to the Environmental Authority and PRCP schedule.

EnvA submits that:

1. The proposed extension represents a substantial expansion of an already extensive mining operation, with significant additional impacts on land, biodiversity, water resources and the climate.
2. The environmental assessment does not adequately demonstrate that the proposed impacts can be avoided, mitigated or satisfactorily offset, particularly when considered in the context of cumulative impacts from existing mining operations throughout the Bowen Basin.
3. The proposed environmental management arrangements do not provide sufficient assurance that impacts on surface water, groundwater, aquatic ecosystems and downstream environments will be adequately managed over the operational and post-closure periods.
4. The PRCP must provide greater certainty that rehabilitation will achieve stable, safe and sustainable post-mining landforms, and that the long-term environmental and financial liabilities associated with residual voids, waste rock and mine-affected water will not be transferred to the community.
5. The assessment of greenhouse gas emissions must adequately consider both direct and indirect emissions associated with the additional coal production and the implications for Queensland's and Australia's climate commitments.
6. The proposed amendments should not be approved without substantially stronger, enforceable environmental conditions and rehabilitation requirements.

Further detail supporting our submission is provided below.

GROUNDS FOR SUBMISSION

1. Significant additional environmental disturbance and cumulative impacts

The proposed Project would result in approximately 2,317 ha of additional disturbance, comprising open-cut pits, waste rock emplacements, water management infrastructure, haul roads and associated facilities.

While the Proponent describes the Project as a logical continuation of existing operations, this should not diminish the significance of the additional environmental impacts.

Blackwater Mine has operated since 1967 and already occupies an extensive area of the Bowen Basin. The surrounding region has experienced decades of coal mining, agricultural development, vegetation clearing and associated environmental disturbance.

The environmental assessment acknowledges that the Project's impacts will be additive to existing disturbance in the region.

EnvA is concerned that the cumulative effects of mining development are not adequately addressed by assessing individual project impacts in isolation.

In particular, cumulative impacts include:

- progressive loss and fragmentation of remnant vegetation and wildlife habitat;
- increasing pressure on threatened species and ecological communities;
- changes to natural drainage patterns and catchment hydrology;
- groundwater drawdown and changes to groundwater quality;
- cumulative impacts on aquatic ecosystems and receiving waterways; and
- the cumulative contribution of greenhouse gas emissions to climate change.

The fact that some individual impacts may represent a relatively small proportion of regional vegetation or habitat does not mean they are environmentally insignificant. The continued incremental loss of habitat and degradation of ecosystems can ultimately undermine their long-term viability.

EnvA recommends that:

- The cumulative environmental impacts of the Project be assessed in the context of all existing and reasonably foreseeable mining activities throughout the Bowen Basin.
- The Proponent demonstrate how the additional disturbance can be justified when considered alongside the cumulative loss of biodiversity and water resources in the region.
- The Department require enforceable conditions to avoid further unnecessary disturbance and ensure that all practicable opportunities to minimise the Project footprint are implemented.

2. Threatened species, biodiversity and habitat loss

EnvA's May 2026 submission on the Project's EPBC referral[1] identified significant concerns about impacts on threatened species and ecological communities.

The Proponent's referral identified significant residual impacts on:

- 50.68 hectares of Brigalow (*Acacia harpophylla* dominant and co-dominant) – endangered ecological community;
- 319.44 hectares of squatter pigeon habitat – vulnerable;
- 61.4 hectares of koala habitat – endangered; and
- 20.86 hectares of Australian painted snipe habitat – endangered.

[1] EnvA (May 2026) Submission on Referral: Blackwater Northern Extension Project (EPBC 2026/10494)

The referral also identified potential impacts on several migratory bird species.

EnvA remains concerned that the additional clearing and habitat fragmentation will further reduce the availability and connectivity of habitat in an already heavily disturbed landscape.

The Proponent's terrestrial ecology assessment[2] identifies approximately 3.93 ha of remnant regional ecosystem vegetation and 39.78 ha of high value regrowth within the Project disturbance footprint. However, the relatively small proportion of remnant vegetation does not adequately reflect the importance of the broader habitat area, including regrowth vegetation and areas used by threatened fauna.

Habitat value cannot be assessed solely by whether vegetation is formally mapped as remnant. Regrowth, riparian vegetation and connected woodland areas can provide important feeding, breeding, shelter and movement opportunities for wildlife. This is further demonstrated by the identification of these areas as habitat for threatened species and ecological communities.[2]

EnvA is also concerned about the reliance on offsets to compensate for the loss of biodiversity.

Offsets should not become a mechanism that allows continued destruction of important habitat. They must demonstrate genuine additional conservation outcomes, be ecologically appropriate and provide long-term protection.

EnvA recommends that:

- The Department independently scrutinise the terrestrial ecology assessments, including survey methodology, seasonal coverage and the identification of threatened species habitat.
- The Proponent demonstrate that all practicable opportunities to avoid and minimise impacts on threatened species and their habitats have been exhausted.
- The Department require enforceable rehabilitation and habitat restoration commitments, including measurable biodiversity outcomes.
- Any proposed offsets demonstrate additionality, ecological equivalence, long-term protection and appropriate management and monitoring arrangements.

3. Surface water and aquatic ecosystems

EnvA has significant concerns about the potential impacts of the Project on local waterways, catchment hydrology and downstream receiving environments, particularly given the extensive modifications to drainage systems resulting from decades of mining throughout the Blackwater region.

The Project is located within the Mackenzie River catchment, part of the Fitzroy Basin, which ultimately drains into the Great Barrier Reef. Local waterways include Taurus Creek, Deep Creek, Two Mile Gully, Sagittarius Creek and Blackwater Creek. These waterways provide important drainage functions and support aquatic and riparian ecosystems. [3]

The Proponent's assessment acknowledges that mining has already consumed the upper headwaters of parts of the Sagittarius Creek and Two Mile Gully catchments. EnvA is concerned

[2] E2M (April 2026) Appendix D. Blackwater North Extension Project – Terrestrial Ecological Assessment

[3] WRM (October 2026) Appendix B. Blackwater North Extension Project – Surface Water Assessment

that further changes to natural drainage patterns and catchment areas will add to the cumulative impacts of existing mining operations.

The Project will reduce the catchment area reporting to Taurus Creek by approximately 8.9 per cent and the catchment area reporting to Sagittarius Creek by approximately 7.9 per cent. While the Proponent considers these changes to have insignificant effects on flow regimes, the cumulative consequences of progressively modifying natural catchments require greater consideration.

EnvA is particularly concerned about the following matters:

- Changes to natural drainage patterns and surface water flow regimes.
- Increased sediment mobilisation and erosion associated with disturbed landforms and altered drainage.
- Potential contamination of surface water from mine-affected water releases and runoff from waste rock and rehabilitated areas.
- Changes to flood behaviour resulting from mine landforms, diversions and other infrastructure.
- The potential for floodwaters to enter residual mine voids and interact with potentially contaminated mine water and exposed waste materials.
- Cumulative impacts on downstream aquatic ecosystems and water quality.

3.1 Mine-affected water and downstream water quality

The Project will require continued management of mine-affected water, including controlled releases to receiving waterways.

The Proponent's assessment indicates that the Project would result in an increase of approximately 11–20 per cent in annual controlled release volumes under median climatic conditions. The Blackwater Mine already releases substantial volumes of mine-affected water during the wet season.[4] The predicted increase in controlled releases associated with the Project could place additional pressure on receiving waterways and ultimately contribute to the degradation of downstream environments, including the Great Barrier Reef.

This threat was recognised in the original referral of the application for EPBC assessment[5], which determined that relevant controlling provisions were:

- World Heritage properties (sections 12 and 15A)
- National Heritage places (sections 15B and 15C)
- Listed threatened species and communities (sections 18 & 18A)
- Listed migratory species (sections 20 & 20A)
- Great Barrier Reef Marine Park (sections 24B and 24C)
- A water resource, in relation to unconventional gas development and large coal mining development (sections 24D & 24E)

[4] Queensland Government. Fitzroy Basin coal mine water releases website

[5] National Environmental Protection Agency (2024) Blackwater Mine – Northern Extension Project 2023/09723: Assessment Approach

EnvA is concerned that the additional demands placed on existing water management systems and receiving waterways have not been adequately considered in the context of cumulative mine water releases throughout the Fitzroy Basin.

The environmental assessment identifies existing exceedances of water quality objectives in the receiving environment. In particular, median total suspended solids and turbidity downstream of the mine generally exceed both the relevant water quality objectives and levels recorded at upstream monitoring sites. Nutrient concentrations also exceed relevant objectives in several monitoring locations.

These existing water quality issues demonstrate the importance of ensuring that additional mining activities do not further degrade receiving environments.

The Fitzroy Basin is one of the largest catchments draining to the Great Barrier Reef. Water quality impacts from individual mining operations can accumulate across the catchment and ultimately affect downstream ecosystems.

EnvA does not consider it sufficient to rely on existing mine water management arrangements without demonstrating that they will adequately manage the additional demands and risks associated with an extended mining operation.

EnvA recommends that:

- A comprehensive assessment of cumulative surface water impacts be undertaken, including the effects of existing and proposed mine water releases throughout the catchment.
- The Department independently review the predicted increase in controlled release volumes and assess the capacity of receiving waterways to accommodate additional releases without deterioration in water quality.
- The Department require enforceable water quality limits and monitoring requirements for all relevant receiving environments.
- The Proponent provide transparent reporting of mine-affected water storage, releases, water quality and compliance.
- Water releases must not cause deterioration of receiving water quality or adversely affect aquatic ecosystems.
- Monitoring must continue throughout operations, rehabilitation and the post-closure period, with clear trigger levels and enforceable corrective actions.

3.2 Flooding and the long-term management of residual voids

EnvA is particularly concerned about the potential interaction between floodwaters and the residual mine voids that will remain following mine closure.

The proposed final landform includes a number of substantial residual voids across the Blackwater Creek, Taurus Creek, Deep Creek, Two Mile Creek and Burngrove Creek catchments.

The Proponent's flood modelling[6] considers a range of events, including the 1% Annual Exceedance Probability (AEP) event (1-in-100-year), 0.1% AEP (1-in-1,000-year) and Probable Maximum Flood (PMF) events.

[6] WRM (May 2026) Blackwater Mine Progressive Rehabilitation and Closure Plan – Voids in Floodplain Modelling

The assessment concludes that the Mimosa/Besgrove void would be outside the riverine flood extent for events up to the PMF, while the Deep Creek, Stewarton North and Stewarton South voids would have flood immunity up to and including the PMF. The R30 void is predicted to have flood immunity up to the 0.1 per cent AEP event, with floodwater ingress predicted during a PMF event.

EnvA considers that the Department must carefully scrutinise the assumptions, limitations and reliability of this modelling, particularly given the long-term consequences of leaving large mine voids in a floodplain environment.

Flood events that were historically considered rare are increasingly being exceeded as climate conditions change. The assessment must therefore demonstrate that the proposed landforms and voids will remain safe and environmentally sustainable under future climate conditions, rather than relying on historical flood frequency assumptions alone.

The consequences of floodwater entering a residual void require particular attention. Floodwater may introduce sediment, organic material and other contaminants, alter the volume and quality of water within the void, and potentially create pathways for contaminants to move into surrounding environments.

There is also a need to consider the consequences of floodwater interacting with mine waste, exposed pit walls and potentially saline void water. The Department should not assume that the absence of predicted overtopping necessarily demonstrates that the residual voids will not cause environmental harm.

The final void water balance assessment considers a 0.1 per cent AEP, 72-hour storm event and concludes that the voids would not overtop. However, this assessment is based on modelled starting water levels and specific assumptions about rainfall, runoff and evaporation. The modelling also uses a historical climate dataset adjusted for a selected future climate scenario and repeated to generate a 1,000-year sequence.

EnvA considers that the Department should require independent scrutiny of whether this approach adequately accounts for changing climate conditions, including the potential for more intense rainfall, prolonged wet periods and extreme flood events over the very long periods for which these voids will remain.

EnvA recommends that:

- The Department independently review the flood modelling for all proposed residual voids, including the assumptions used to determine flood levels, flood immunity and potential floodwater ingress.
- The modelling demonstrate the resilience of the final landform under future climate scenarios, including changes in rainfall intensity, extreme rainfall events and flood behaviour.
- The potential consequences of floodwater entering residual voids be fully assessed, including impacts on void water quality, surrounding land, groundwater and downstream receiving environments.
- The Proponent demonstrate that all proposed voids can be safely managed without causing environmental harm under reasonably foreseeable extreme weather and flooding conditions.

- The Department require ongoing monitoring of void water levels and water quality, with enforceable trigger levels and corrective actions.

4. Groundwater impacts

EnvA is concerned about the potential impacts of the Project on groundwater resources, including changes to groundwater levels, groundwater quality and the interaction between groundwater systems and the proposed residual mine voids.

The groundwater assessment[7] identifies several groundwater systems within the Project area, including Quaternary alluvium, Tertiary sediments and basalt, Triassic formations and the Permian coal measures.

These groundwater systems have varying characteristics and environmental values, including their potential use for stock watering, farm supply, irrigation, industrial purposes and the support of aquatic ecosystems.

The Proponent's assessment acknowledges that groundwater quality in the vicinity of Blackwater Mine is generally brackish to saline and that the alluvium is unsuitable for stock watering and irrigation due to existing water quality limitations, including elevated salinity, boron, manganese and uranium.

A previous landholder bore census identified 18 bores in use, equipped with pumping infrastructure and used for stock and farm supply.

EnvA is concerned that further changes to groundwater levels and quality could exacerbate existing limitations on groundwater resources and affect the long-term availability and suitability of groundwater for beneficial uses.

4.1 Groundwater drawdown and changes to groundwater systems

Open-cut mining can directly intercept groundwater-bearing formations and alter natural groundwater flow patterns.

The Proponent's assessment predicts drawdown within the Permian coal measures as a direct result of mining. The maximum predicted incremental drawdown extends laterally towards Blackwater Creek, although the assessment indicates that it does not extend vertically into the shallow alluvial and Tertiary formations.

While the Proponent considers that impacts on surrounding groundwater users will remain within applicable bore drawdown thresholds, EnvA is concerned that the assessment should not be limited to the impacts on identified registered bores.

Groundwater systems also support ecological processes, contribute to surface water flows and provide important environmental values that may not be fully captured by an assessment of individual bore impacts.

There is a need to consider the cumulative effects of existing mine workings, the proposed extension and the long-term groundwater consequences of residual voids.

[7] SLR (October 2026) Blackwater North Extension Project – Groundwater Impact Assessment

EnvA recommends that:

- The Department require a comprehensive assessment of cumulative groundwater impacts, including interactions between existing mine workings, proposed extensions and residual voids.
- Groundwater modelling assumptions and predictions be independently reviewed, including the extent and duration of predicted drawdown.
- The potential impacts on groundwater-dependent ecosystems and surrounding groundwater resources be adequately assessed.
- Baseline groundwater monitoring be sufficiently comprehensive to identify changes in groundwater levels and quality.
- The Proponent establish enforceable groundwater trigger levels and corrective actions.
- Monitoring and management obligations continue after mining ceases until groundwater systems have demonstrably stabilised and there is no ongoing risk of environmental harm.

4.2 Long-term groundwater impacts associated with residual voids

EnvA has particular concerns about the long-term interaction between groundwater and the residual voids proposed to remain following mine closure.

The Proponent's groundwater assessment identifies that three of the five residual voids associated with the Project area and its immediate surrounds are predicted to become long-term groundwater sinks, while the other two are predicted to operate as flow-through systems that report to those long-term sinks.

This indicates that groundwater is predicted to continue flowing into these residual voids after mining has ceased. The voids will effectively remain part of the groundwater system, potentially for hundreds of years.

The Proponent acknowledges that water entering the voids will be subject to evaporation, resulting in a gradual concentration of salts in the pit lakes over time.

The final void water balance assessment further predicts that the salinity of the Mimosa/Besgrove, Deep Creek and Stewarton North voids will increase over time due to evapoconcentration. Salinity in the R30 and Stewarton South voids is predicted to fluctuate as water levels change.

EnvA is concerned that the long-term accumulation of salts and other dissolved constituents could result in increasingly poor water quality within these voids.

The Proponent argues that the voids will remain groundwater sinks and that this will prevent the migration of saline water into surrounding groundwater systems. However, this conclusion depends on the long-term persistence of the predicted groundwater flow directions and the integrity of the surrounding geological formations.

EnvA does not consider that the classification of a void as a groundwater sink, by itself, demonstrates that it will remain non-polluting or that the risk of environmental harm has been adequately addressed.

Changes in groundwater levels, groundwater gradients, geological conditions and water quality over extended periods could alter the interaction between the voids and surrounding groundwater systems.

The Department should also consider the potential for groundwater to transport contaminants from waste rock, spoil and other mine materials into the residual voids, and whether these interactions could create environmental risks over the long term.

The modelling of groundwater and void water levels over hundreds of years involves considerable uncertainty. The Department should not rely solely on modelled equilibrium conditions to conclude that the residual voids will remain environmentally safe.

EnvA recommends that:

- The Department require independent verification of the groundwater modelling and the predicted behaviour of residual voids as groundwater sinks or flow-through systems.
- The Proponent demonstrate that the predicted groundwater flow directions and hydraulic relationships will remain reliable under changing groundwater levels and climatic conditions.
- The potential for saline water and other contaminants to migrate from residual voids into surrounding groundwater systems be independently assessed.
- The Department require comprehensive monitoring of groundwater levels and quality around all residual voids, including monitoring of salinity and other relevant contaminants.
- Groundwater monitoring and management obligations continue for as long as the residual voids have the potential to cause environmental harm.
- The Proponent demonstrate that sufficient financial provision is available to meet the costs of long-term groundwater monitoring, management and any necessary remediation.

5. Residual voids and long-term closure risks

EnvA has significant concerns about the long-term environmental consequences of leaving residual mine voids at Blackwater Mine.

The proposed Progressive Rehabilitation and Closure Plan identifies 15 residual voids across the wider Blackwater Mine operation. These voids will remain as non-use management areas (**NUMA**) rather than being rehabilitated to a conventional post-mining land use.

The scale of these voids is substantial. The final void water balance assessment identifies individual voids with depths exceeding 200 metres and capacities of hundreds of thousands of megalitres to their respective crest levels.

For example:

- The Mimosa/Besgrove void has a modelled depth of approximately 176 metres and a modelled storage capacity of approximately 375,000 ML to crest.
- The Stewarton North void has a modelled depth of approximately 208 metres and a capacity of approximately 303,000 ML to crest.

- The South Ballamoo void has a modelled depth of approximately 206 metres and a capacity of approximately 377,000 ML to crest.
- The Togara North/North Marshmead void has a modelled depth of approximately 202 metres and a capacity of approximately 293,000 ML to crest. (Table 2 of the Progressive Rehabilitation and Closure Planning – Blackwater Mine – Final Void Water Balance[8]).

In total, the 15 proposed mine voids have been designed to hold 2,157.59 GL of water. These are enormous excavations that will remain as permanent features of the landscape.

Overall, the proposed Revision 3 configuration results in a net increase in NUMA footprint of 135 ha, increasing the total NUMA area from 3,178 ha under the approved PRCP Schedule (Revision 2) to 3,313 ha under the proposed Revision 3 configuration.

Accordingly, the proposed Revision 3 identifies a total NUMA footprint of 3,313 hectares across the Blackwater Mine. These areas are designated for non-use management rather than rehabilitation to a conventional post-mining land use. This proposed NUMA area is roughly 60% the size of the entire water surface area of Sydney Harbour (5,500 ha)[9] and is designed to store more than four times the volume of water in Sydney Harbour (500 GL)[10].

The proposed closure arrangements do not restore these areas to productive land or a conventional environmental use. Instead, the voids will retain water, require safety measures such as bunding, fencing and signage, and remain subject to ongoing environmental management.

EnvA questions whether this should be considered an acceptable rehabilitation outcome, particularly when the voids will remain in place for hundreds of years.

5.1 Long-term water quality and environmental risks

The Proponent's final void water balance assessment predicts that the water levels in the 15 residual voids will reach equilibrium within approximately 100 to 500 years after closure.

This is an extraordinarily long period over which the environmental performance of the voids must be maintained.

The assessment also predicts increasing salinity in several of the proposed pit lakes as evaporation concentrates salts over time.

EnvA is concerned that these water bodies may become increasingly saline and unsuitable for beneficial uses, including stock watering, irrigation, recreation or other productive purposes.

The fact that the voids are predicted to retain water below their respective overflow levels does not demonstrate that the water will be of acceptable quality or that the voids will constitute a sustainable post-mining land use.

The Department should require the Proponent to demonstrate that the residual voids will not cause environmental harm through the accumulation or release of contaminants, groundwater interactions, seepage, erosion or other long-term processes.

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[8] WRM (May 2026) Appendix 4.16. Progressive Rehabilitation and Closure Planning – Blackwater Mine. Final Void Water Balance

[9] East Coast Sailing (2026) Sydney Harbour Facts: Depth, Size, Wildlife and the Bridge

[10] Australian Government Bureau of Meteorology (2012) When dam size matters

5.2 Floodplain location and long-term stability

EnvA is particularly concerned about residual voids located within or associated with floodplain environments.

Leaving enormous excavations in flood-prone landscapes creates long-term risks that cannot be dismissed simply because modelling predicts that the voids will retain a particular level of flood immunity.

The floodplain location of some residual voids creates additional long-term rehabilitation and environmental risks, as discussed in section 3.2. The Department must be satisfied that these voids can achieve a safe and stable final landform and will not be subject to unacceptable flood-related environmental impacts.

The long-term consequences of such interactions need to be assessed in the context of changing climatic conditions and the increasing risk of extreme rainfall and flooding.

The Department's own Non-use Management Areas information sheet[11] states that, for new site-specific mines, a proposed NUMA containing a void wholly or partly within a floodplain will not be approved. Such a void must instead be rehabilitated to a safe and stable landform capable of supporting an approved post-mining land use without causing environmental harm.

While the Department will need to consider the applicable transitional and existing approval arrangements for Blackwater Mine, this policy demonstrates the importance Queensland places on avoiding residual voids in floodplain environments.

EnvA considers that the Department should explain how the proposed residual voids are consistent with the objectives of Queensland's mined land rehabilitation framework, particularly where the final landform cannot be restored to a stable and sustainable post-mining land use.

5.3 Failure to demonstrate a stable and non-polluting landform

Under the Environmental Protection Act 1994, a stable condition requires land to be safe and structurally stable, not cause environmental harm and be capable of sustaining an approved post-mining land use.

The NUMA framework also requires the risk of collapse, erosion and subsidence to be minimised, the need for active management to be minimised, and access to be sufficiently restricted where necessary.

EnvA is concerned that the proposed residual voids fall short of the broader objective of returning mined land to a safe, stable and non-polluting condition.

The reliance on safety bunds, fencing, signage and ongoing management highlights that these areas will remain potentially hazardous and cannot be returned to unrestricted use.

Furthermore, the need to manage potentially saline water, groundwater interactions and long-term environmental risks raises questions about whether the proposed arrangements will genuinely minimise the need for active management.

A residual void should not be considered an acceptable closure outcome simply because modelling predicts that it will not overtop or cause unacceptable environmental harm under a particular set of assumptions.

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[11] Queensland Government (2025) Information Sheet – Non-use Management Areas

The Department must be satisfied that the proposed arrangements will remain effective over the very long period that these voids will exist, including under changing climatic conditions and potential changes to groundwater systems.

EnvA recommends that:

- All practicable opportunities to minimise the number, size and depth of residual voids be explored, including further backfilling and alternative landform designs.
- The Department require a clear justification for each proposed residual void, including why rehabilitation to a stable condition and sustainable post-mining land use is not achievable.
- The Department independently review the proposed void designs, flood modelling, groundwater modelling and final void water balance assessments.
- Particular scrutiny be given to voids located within or associated with floodplain environments, including their resilience to extreme flooding and changing climatic conditions.
- The Proponent demonstrate that all residual voids will achieve a safe, structurally stable and non-polluting condition, with no unacceptable environmental harm to surrounding land, surface water or groundwater.
- The Department require enforceable water quality, groundwater and structural stability monitoring requirements, with appropriate trigger levels and corrective actions.
- Long-term management requirements, including safety bunds, fencing, water quality monitoring and remediation, be adequately funded through financial provisioning arrangements.
- The Department does not approve the proposed NUMA arrangements unless it is satisfied that the long-term environmental and public safety risks can be satisfactorily managed.

6. Progressive rehabilitation and closure

EnvA is concerned about the long-term rehabilitation and closure obligations associated with the Project.

The PRCP identifies a disturbance footprint of approximately 2,317 hectares for the Project and incorporates the extension into the broader rehabilitation and closure planning framework for Blackwater Mine.

The Proponent is seeking to expand mining operations into additional areas, with the proposed extension operating until approximately 2055. The GHG assessment also indicates that the amended mine plan would extend the overall operational life of Blackwater Mine from approximately 2090 to 2093. This represents a substantial additional rehabilitation liability.

The PRCP must provide confidence that disturbed land can be returned to a safe, stable and sustainable condition and that rehabilitation will not simply result in the creation of extensive areas of land that require ongoing management.

EnvA is particularly concerned about the following matters.

6.1 Progressive rehabilitation

Progressive rehabilitation should be undertaken as soon as practicable after areas are no longer required for mining operations.

Delaying rehabilitation until the end of the mine life increases the risk that rehabilitation will not be completed in a timely manner and leaves large areas of disturbed land exposed to erosion, sedimentation and other environmental risks.

The Department should ensure that rehabilitation milestones are specific, measurable and enforceable.

The Proponent should not be able to defer rehabilitation simply because the mine continues to operate elsewhere.

EnvA recommends that:

- Progressive rehabilitation be undertaken as soon as practicable following the completion of mining in each area.
- Rehabilitation milestones include clear timeframes and measurable completion criteria.
- Rehabilitation performance be independently assessed and publicly reported.
- Failure to meet rehabilitation milestones should trigger enforceable corrective actions.

6.2 Rehabilitation outcomes and post-mining land use

The PRCP[12] is not just about the proposed northern extension. It revises the rehabilitation and closure framework for the wider Blackwater operation, including an increase in the overall NUMA footprint from 3,178 ha to 3,313 ha.

The PRCP identifies grazing as a proposed post-mining land use for significant areas of rehabilitated land. However, returning land to a grazing land use does not necessarily mean that its environmental values have been restored.

Rehabilitation should consider soil stability, vegetation establishment, erosion control, drainage, biodiversity and the long-term sustainability of the proposed land use.

The Department should ensure that rehabilitation criteria are not limited to establishing vegetation cover or demonstrating that land can support a basic agricultural use.

EnvA recommends that:

- Rehabilitation criteria include measurable soil stability, vegetation establishment, erosion control and biodiversity outcomes.
- The Proponent demonstrate that rehabilitated land can sustain the proposed post-mining land use without ongoing environmental harm.
- Rehabilitation success be independently assessed over a sufficiently long period to demonstrate that outcomes are sustainable.
- The PRCP include transparent reporting of rehabilitation performance and any areas that fail to meet completion criteria.

[12] Whitehaven Coal (October 2026) Blackwater Mine – Progressive Rehabilitation and Closure Plan

7. Financial assurance and rehabilitation liabilities

EnvA is concerned about the financial risks associated with the continued expansion of large coal mining operations.

The Proponent is seeking to extend the life of Blackwater Mine by approximately 26 years and extract another 200 million tonnes of coal. This will create substantial additional rehabilitation and closure obligations.

The financial consequences of inadequate rehabilitation can ultimately be transferred to the Queensland community if companies are unable or unwilling to meet their obligations.[13]

The Department must be satisfied that the financial provision arrangements adequately reflect the true cost of rehabilitating the additional disturbance and managing the mine's long-term environmental liabilities.

This is particularly important given the scale of the proposed residual voids and non-use management areas, which may require ongoing management after the mine ceases operating.

EnvA recommends that:

- The financial provisioning requirements for the Project be independently reviewed.
- The estimated rehabilitation and closure costs reflect realistic costs of completing the required works, including long-term monitoring and management.
- Financial assurance be sufficient to protect the Queensland community from inheriting unfunded rehabilitation liabilities.
- Rehabilitation cost estimates and financial provisioning arrangements be reviewed regularly to reflect changes in disturbance, rehabilitation performance and closure requirements.

8. Greenhouse gas emissions and climate change

EnvA remains concerned that the greenhouse gas emissions associated with the Project have not been adequately addressed in the context of Queensland's and Australia's climate commitments.

The Project would facilitate the extraction of approximately 200 million tonnes of additional coal and extend mining operations until approximately 2055. The Greenhouse Gas Emissions (**GHG**) Report[14] estimates that the Project will be a medium to high emitter under the Queensland GHG Guideline.

The Proponent's GHG Management and Abatement Plan estimates that, over the life of the whole mine under the Project Scenario, emissions will total 66.18 Mt CO_2-e of Scope 1 emissions, 3.41 Mt CO_2-e of Scope 2 emissions and 2,292.09 Mt CO_2-e of Scope 3 emissions.

Importantly, the report also provides a Project Only Scenario, which isolates the estimated additional emissions attributable to the proposed extension. These are estimated at 18.30 Mt CO_2-e of Scope 1 emissions, 0.27 Mt CO_2-e of Scope 2 emissions and 530.16 Mt CO_2-e of Scope 3 emissions.

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[13] EnvA (September 2026) Submission to the Review of Queensland's Financial Provisioning Scheme

[14] Whitehaven (undated) Appendix G. Blackwater North Extension Project – Greenhouse Gas Management and Abatement Plan

Even when considering only the additional emissions attributable to the extension, the Project would contribute approximately 530 million tonnes of additional Scope 3 emissions.

While the Proponent may argue that much of the coal will be used for steelmaking, this does not remove the climate impacts associated with its production and use.

The Project is expected to produce predominantly metallurgical coal, together with some thermal coal. Regardless of where the coal is ultimately used, the resulting greenhouse gas emissions contribute to global warming.

EnvA is concerned that the continued approval of large coal mine extensions is inconsistent with the need to reduce global greenhouse gas emissions and limit climate change.

Queensland is already experiencing the consequences of climate change, including increasingly severe heatwaves, extreme rainfall events, floods, droughts and bushfires.

The Great Barrier Reef is also increasingly threatened by marine heatwaves and coral bleaching.

These impacts will become more severe as global temperatures continue to rise.

The Department should not consider the greenhouse gas emissions of the Project solely in terms of compliance with the Safeguard Mechanism. Compliance with an emissions reporting or regulatory scheme does not demonstrate that a project is consistent with the necessary reduction in Australia's overall emissions.

EnvA recommends that:

- The Department consider the contribution of these emissions to climate change and the resulting impacts on Queensland's environment, including the Great Barrier Reef and threatened species.
- The Proponent demonstrate how the Project's emissions will be consistent with Queensland's and Australia's emissions reduction commitments. The Proponent's GHG assessment indicates that its Scope 1 emissions would not reach net zero until 2093 (Chart 2, pg. 23 of the GHG Report[6]) .
- Any approval include enforceable emissions reduction requirements rather than relying solely on existing reporting and compliance obligations.

EnvA considers that the climate implications of approving another 200 million tonnes of coal production cannot be dismissed simply because the Project extends an existing operation.

9. Community consultation and transparency

EnvA is concerned that the scale and duration of the proposed Project warrant meaningful and ongoing community engagement.

The Proponent's application documents should demonstrate that affected communities and stakeholders have had adequate opportunities to raise concerns and that those concerns have been considered in the final project design and environmental management arrangements.

The community should also have access to meaningful information about the environmental performance of the mine, particularly in relation to water quality, mine-affected water releases, rehabilitation and compliance with environmental conditions.

Transparency is essential to maintaining public confidence in the regulation of large mining operations.

EnvA recommends that:

- The Proponent be required to undertake meaningful consultation with affected landholders, local communities and relevant Traditional Owners.
- The Department ensure that material environmental monitoring and compliance information is publicly accessible.
- The Proponent publish regular reports on water management, environmental incidents, rehabilitation progress and compliance with approval conditions.
- Community concerns raised during the assessment process be documented and appropriately addressed.

CONCLUSION AND RECOMMENDATIONS

EnvA recognises the importance of regional employment and economic activity in Central Queensland. However, this should not come at the expense of the environment or result in long-term environmental liabilities being transferred to future generations.

EnvA is also concerned about the potential human rights implications of the Project. These include the permanent loss of land and environmental values, increased greenhouse gas emissions and associated climate impacts, the degradation of important places such as the Great Barrier Reef that support community, cultural and economic values, and ongoing risks to the quality and availability of surface water and groundwater.

The Blackwater North Extension Project represents a substantial expansion of an already extensive mining operation. The extraction of another 200 million tonnes of coal and the extension of mining operations until approximately 2055 will result in significant additional environmental disturbance and greenhouse gas emissions.

EnvA is disappointed that the Project was not required to prepare an Environmental Impact Statement (**EIS**), despite involving approximately 2,317 hectares of additional disturbance and the extraction of another 200 million tonnes of coal. The assessment of the initial Project was previously determined to be an accredited assessment under the EP Act.[5,15]

The Project has significant implications for Matters of National Environmental Significance and Matters of State Environmental Significance. While the Project is subject to separate Commonwealth and Queensland assessment processes, EnvA is concerned that neither process has provided the level of comprehensive, integrated assessment and public scrutiny that would be expected for a development of this scale.

The absence of an EIS also means that the community has not had the opportunity to participate in the more comprehensive assessment process that an EIS would ordinarily provide. EnvA considers that the Department must ensure that the current assessment process adequately addresses the full range of environmental impacts and the long-term consequences of the proposed development.

EnvA is particularly concerned about cumulative biodiversity loss, impacts on surface water and groundwater resources, the long-term management of residual voids and the adequacy of

[15] DCCEEW (May 2024) Statement of Reasons for a Decision on Controlled Action Under the *Environment Protection and Biodiversity Conservation Act 1999: Blackwater Mine- North Extension Project, Blackwater, Queensland (EPBC 2023/09723)*

rehabilitation and financial provisioning arrangements. This must be considered in relation to the many coal mine expansions in the region, including the nearby Blackwater South Coking Coal Project, which is also undergoing assessment as a coordinated project.[16]

The fact that the Project will utilise existing mine infrastructure does not mean that its additional environmental impacts are insignificant or that the risks can be adequately managed through existing environmental conditions.

EnvA therefore recommends that:

1. The Department refuse the proposed amendments to the Environmental Authority and PRCP schedule because the application has not adequately demonstrated that the significant environmental impacts and long-term rehabilitation liabilities can be satisfactorily managed.
2. If the Department is minded to approve the amendments, it must require substantially stronger and enforceable environmental conditions addressing biodiversity, cumulative impacts, surface water, groundwater, greenhouse gas emissions and progressive rehabilitation.
3. The PRCP schedule must provide clear, measurable and enforceable rehabilitation milestones, including appropriate completion criteria for residual voids, waste rock landforms and non-use management areas.
4. The Department require independent verification of key environmental assessments, particularly water management, groundwater modelling, residual void closure and rehabilitation outcomes.
5. Financial provisioning arrangements must adequately reflect the full costs of rehabilitation, closure and long-term environmental management, ensuring that these liabilities are not transferred to the Queensland community.
6. All relevant environmental monitoring, rehabilitation performance and compliance information be made publicly available.

Thank you for the opportunity to comment on the proposed amendments to the Environmental Authority and Progressive Rehabilitation and Closure Plan for the Blackwater North Extension Project.

Kind regards,



Dr Coral Rowston
Director
Environmental Advocacy in Central Queensland Inc.

[16] Office of the Coordinator General. Blackwater South Coking Coal Project