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

2 November 2026

RE: Submission on Referral – Foxleigh Coal Mine – Roper Creek Extension Project (EPBC 2026/10683)

Thank you for the opportunity to make this submission in response to the referral of the Foxleigh Coal Mine – Roper Creek Extension Project (**the Project**) proposed by Foxleigh Coal Pty Ltd, a wholly owned subsidiary of QMetco 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 submits that the referral documentation is limited in detail, and that the proposed action is likely to have unacceptable impacts on Matters of National Environmental Significance (**MNES**) which cannot presently be avoided, mitigated or offset.
2. EnvA strongly recommends it be declared a controlled action due to significant residual impacts on:
    - Listed threatened species and communities (ss 18 and 18A),
    - Water resources (ss 24D and 24E),

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- World Heritage (ss 12 and 15A),
- National Heritage (ss 15B and 15C), and
- Great Barrier Reef Marine Park (ss 24B and 24C).

3. We further recommend that if this Project is accepted for assessment, that it be assessed through a bilateral environmental impact statement (**EIS**) process. An EIS assessment would allow:
   - 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[1]

The proposed Project is an extension of the existing Foxleigh Coal Mine which is located in the Bowen Basin approximately 12 km south-east of the town of Middlemount and 270 km by road north-west of the Rockhampton in Central Queensland.

The proposed Project involves developing one new satellite open cut pit and extension of the existing Eagles Nest Pit into the area covered by Mineral Development Licence (MDL) 3028 and Exploration Permit for Coal (EPC) 855, targeting coal resources to the west of the existing Foxleigh Mine. The 1,199 ha Project area is located within the proposed Mining Lease Application (MLA) on MDL 3028 and EPC 855.

Approximately 18 Mt of run-of-mine (ROM) coal will be mined from the MDL over a 20 year period (producing between <1 and 2.2 Mtpa) using the same conventional truck and excavation processes, fleet and workforce used elsewhere at the Foxleigh Mine. Coal from the Project area will be transported from the Project's ROM coal pad to the existing coal handling and processing plant (CHPP) located on ML70171.

The Proponent considers that the Project would support the ongoing demand for metallurgical coal products throughout international markets and would be timed to come online as production from other parts of the existing Foxleigh Mine declines as to maintain production to meet market demand.

Operations at the Foxleigh mine commenced in 1999 and, while the proposed Project will sustain its operation, the mine is not dependent on the Project. Approved works within the existing footprint will continue until the current end of life whether or not the Project is approved.

GROUNDS FOR SUBMISSION

Threatened species and communities

The Project will or is likely to have a significant impact on numerous threatened species and communities listed under the EPBC Act.

Ecological assessments were undertaken between 2009 - 2011, and supplemented by a preliminary desktop assessment in 2026. There has not been a recent comprehensive assessment to identify threatened species and communities, but rather a likelihood of occurrence evaluation has been prepared. From this assessment, the Proponent has identified that the following species and communities are likely to be significantly impacted by the Project[2]:

[1] Foxleigh Coal Pty Ltd (2026) Referral Application No 03662 - Foxleigh Coal Mine – Roper Creek Extension Project

[2] Aarc (October 2026) Summary of preliminary ecological assessments undertaken in relation to Roper Creek extension of the Foxleigh Mine

Threatened ecological communities

- Brigalow (*Acacia harpophylla* dominant and co-dominant) (Endangered)
- Poplar Box Grassy Woodland on Alluvial Plains (Endangered)

Threatened species

- Squatter pigeon (*Geophaps scripta scripta*: vulnerable)
- Koala (*Phascolarctos cinereus*: endangered)
- Greater glider habitat (*Petauroides volans*: endangered)
- Ornamental snake habitat (*Denisonia maculata*: vulnerable)

EnvA notes that the list of species and communities that may be impacted are regularly identified in coal mine applications in the Bowen Basin. The Project cannot be considered in isolation. The Bowen Basin has experienced decades of incremental habitat clearing, groundwater extraction and river modification through successive coal mine approvals. Each individual project has contributed to cumulative impacts that now threaten ecological function across the region. Approval of another ~1,200 ha of land would further erode the resilience of already fragmented ecosystems.

EnvA is of the view that this Project is likely to result in unacceptable impacts to threatened species and communities from:

- the direct impacts due to the loss of habitat,
- 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 due to greenhouse gas emissions.

We strongly recommend that Listed threatened species and communities (ss 18 and 18A) are included as controlling provisions. It is noted that the Proponent has also suggested that Listed threatened species and communities will be a controlling provision.

Water Resources

The Project is located in the Roper Creek catchment, a tributary of the Mackenzie River within the Fitzroy Basin. The Project area is traversed by an ephemeral drainage feature and an unmapped Water Act watercourse and adjoins the Roper Creek floodplain.

The Project is located within the Mackenzie River catchment of the greater Fitzroy River basin – the largest Great Barrier Reef catchment.

The referral effectively acknowledges that the investigations required to understand groundwater and surface water interactions have not yet been completed. Without that information, neither the Minister nor the public can properly assess the significance of impacts or the effectiveness of proposed mitigation. The Proponent does note that the Project is likely to have a significant impact on water resources as it may result in:

- changes to surface water flows and quality;
- impacts on groundwater quality; and
- aquifer drawdown during and post mining.

EnvA considers that there is likely to be a significant impact on water resources which have not been adequately addressed in the current Project application and that Water resources (ss 24D and 24E) are included as controlling provisions.

Greenhouse Gas (GHG) emissions

A greenhouse gas emission report[3] was prepared following a request for further information from the National Environmental Protection Agency.

Total GHG emissions are estimated at 25.379 million tonnes of carbon dioxide equivalents (Mt CO2-e) comprised of:

- 0.867 Mt CO2-e of Scope 1 emissions;
- 0.014 Mt CO2-e of Scope 2 emissions;
- 24.498 Mt CO2-e of Scope 3 emissions.

The Proponent acknowledges that the Project will trigger NGER reporting requirements and the Safeguard Mechanism, but no detail is provided about managing emissions against a declining facility baseline.

The Proponent's emissions management strategy is to minimise GHG emissions through efficient operation, best-practice design and the progressive adoption of abatement technologies where they are technically and economically practicable.

There is insufficient information required to assess if the Project can meet the requirements of the Safeguard Mechanism and the proposed mitigation is heavily reliant on offsets rather than meaningful emission reduction.

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 Agreement[4]
- Legislated emission reduction targets[5] and interim targets[6],
- Belem Declaration on the Transition away from fossil fuels[7], and the
- Global Methane Pledge.[8]

Reliance on Australian Carbon Credit Units (**ACCUs**) does not constitute genuine abatement and shifts mitigation burdens elsewhere rather than reducing gross emissions.

The Projects GHG emissions will contribute to increased global temperatures and result in adverse impacts to numerous 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 20 years is irresponsible and contrary to meeting legislated emission reduction targets and the legally binding international treaty on climate change.

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[3] Aarc (October 2026) Foxleigh Mine – Roper Creek Extension. Greenhouse Gas Assessment
[4] The Paris Agreement
[5] *Climate Change Act 2022*
[6] Australian Government (2025) Setting our 2035 target and path to net zero
[7] Australia joins Belém Declaration to transition from fossil fuels
[8] Global Methane Pledge

World Heritage, National Heritage and the Great Barrier Reef

The Proponent notes that the Project is located within the Fitzroy Basin catchment - the largest catchment draining to the Great Barrier Reef (**Reef**) World Heritage Area. The Reef is also a listed National Heritage Area and is part of the Great Barrier Reef Marine Park.

The Mackenzie River is one of the five main tributaries and consequently, the Project may directly impact the Reef from potential contamination of watercourses that discharge into the catchment.

Further to this, the GHG emissions will also contribute to global warming which is a significant threat to the Reef.

Conclusion

The referral documentation presents a proposal that would clear approximately 1,200 hectares of habitat, generate more than 25 million tonnes of greenhouse gas emissions, and create significant uncertainty regarding impacts on groundwater and surface-water resources. The Project also poses potential risks to multiple Matters of National Environmental Significance, including threatened species and ecological communities and the environmental values of the Great Barrier Reef.

The lack of contemporary ecological surveys and incomplete groundwater and surface-water investigations mean that the full extent of the Project's environmental impacts has not been adequately established. Furthermore, the cumulative impacts of successive coal mine approvals across the Bowen Basin, together with the Project's substantial greenhouse gas emissions, must be considered when assessing its environmental acceptability.

The Proponent has not demonstrated that these impacts can be adequately avoided, mitigated or repaired, or that the Project is necessary to maintain the operation of the existing approved mine.

Environmental Advocacy in Central Queensland (EnvA) therefore considers that the Project should not proceed.

At a minimum, EnvA strongly recommends that the Project be declared a controlled action, with controlling provisions covering all relevant MNES and assessed through a comprehensive bilateral assessment process. This assessment must include contemporary ecological surveys, rigorous groundwater and surface-water investigations, consideration of cumulative impacts, a thorough assessment of greenhouse gas emissions and meaningful public consultation.

The Minister should not make any decision to approve the Project until its environmental consequences have been comprehensively assessed and it has been demonstrated that unacceptable impacts on Matters of National Environmental Significance will not occur.

Thank you again for the opportunity to make comments on the referral of the Foxleigh Coal Mine – Roper Creek Extension Project.

Yours sincerely,



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Director
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