QUEENSLAND CONSERVATION COUNCIL

PROTECT CONSERVE SUSTAIN

EPBC Assessments via the portal

23 May 2025

RE: Isaac Downs Extension EPBC referral (EPBC 2025/10183)

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the EPBC referral of Isaac Downs Extension (EPBC 2025/10183).

QCC is the peak body for environmental groups in Queensland. Since 1969, we have worked to support communities in protecting their environment and climate. Today we represent 61 groups and more than 20,000 members across the state, of which many are already experiencing the impacts of climate change and unsustainable development on their communities, threatened species, and landscapes.

We urge the Minister to reject the proposal due to its clearly unacceptable impacts.
In particular, the project would have:

- Significant and irreversible impacts on nationally listed threatened species and ecological communities
- Major and uncertain risks to water resources and associated groundwater dependent ecosystems;
- A substantial and ongoing contribution to dangerous climate change;

This submission outlines QCC's strong objection to the Isaac Downs Extension proposal. Based on the referral materials, publicly available science, and current policy context, we consider the project clearly unacceptable under the EPBC Act due to:

- Over-reliance on offsets, despite consistent evidence of their failure;
- Incompatibility with Australia's environmental and climate obligations, including the objectives of the EPBC Act and the Paris Agreement.

1. **Significant impacts on threatened species and ecological communities**

The proposal would destroy over 330 hectares (ha) of habitat considered critical to the survival of endangered species including the koala (Phascolarctos cinereus) and greater glider (Petauroides volans), both of which are in severe decline across Queensland due to habitat

loss, fragmentation, and climate stress. In the Bowen Basin, the destruction is stark. 78.7% of vegetation has already been cleared in the Isaac-Comet Downs Brigalow Belt subregion[1].

Key concerns include:

- Destruction of vital habitat along Conrock Gully and Cherwell Creek, and severance of a key connectivity corridor along the Isaac River due to bridge construction and proximity to mining operations.
- Predicted residual impacts on:
    - Brigalow TEC – 45.68 ha
    - Poplar box TEC – 17.36 ha
    - Squatter pigeon (vulnerable) – 343.8 ha
    - Ornamental snake (vulnerable) – 68.53 ha

Given Queensland's poor record on mine site rehabilitation, these impacts should be treated as permanent losses.

The mitigation measures proposed are inadequate. Generic measures such as staged clearing and use of spotter catchers do not address the cumulative and irreversible destruction of habitat or connectivity corridors. No robust evidence is provided that proposed mitigation will be effective, nor that affected species will persist in adjacent or offset areas.

The proponent relies heavily on biodiversity offsets to justify residual impacts, yet they provide no detailed offset plan or location, including whether like-for-like offsets are available nearby, Critical habitat loss cannot be adequately replaced, especially where time lags undermine species survival.

Offsetting has consistently failed to deliver real biodiversity gains. As former Environment Minister Tanya Plibersek noted in July 2024, "we know the current offset arrangements are broken and making nature worse."[2]

QCC supports comprehensive reform of the offsets framework and urges decision-makers to reject projects that rely on offsets to justify high-impact development.

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[1] Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. (2024). *Remnant Regional Ecosystem Vegetation in Queensland (Version 13.1),*

[2] Cox, L., (2024) *A third of land set aside for restoration in worse state than before, Australian offset audit finds*

2. Unacceptable risks to water resources

The proposed mine would alter the hydrology of the Isaac River sub catchment and involve:

- Diversion of a watercourse,
- Construction of levees on the Isaac River and Cherwell Creek,
- Out-of-pit waste disposal, and
- Creation of a final void in a floodplain landscape.

These activities carry a high risk of long-term disruption to groundwater-dependent ecosystems (GDEs) and water quality, with consequences for threatened species and riparian habitat. The referral lacks adequate hydrological modelling, and no clear plan is presented to manage impacts when GDE health declines.

In the context of increasing climate extremes, including more intense rainfall and flooding, this project poses unacceptable risks to Queensland's water security and ecosystem resilience.

3. Climate impacts and greenhouse gas emissions

The mine would extract up to 52 million tonnes of coal over 22 years (2028–2050), generating more than 80 million tonnes of greenhouse gas emissions.

This is fundamentally incompatible with Australia's commitment under the Paris Agreement to pursue efforts to limit warming to 1.5°C.

A 1.5 degree Celius aligned future is imperative for Queenslanders' human rights. The Queensland Land Court in the 2022 Youth Verdict vs Waratah decision recognised the impact that fossil fuel developments have on the human rights of Indigenous people, and children[3]. Globally, a 1.5 degree aligned future means no new fossil fuel projects can, or need to be approved, according to the International Energy Agency[4].

In 2024, the average global temperature reached 1.6°C above pre-industrial levels, with Australia recording temperatures 1.89°C above average during spring and summer 2024–25.[5]

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[3]Queensland Human Rights Commission (2023) *Case Note: Waratah Coal Pty Ltd v Youth Verdict Ltd & Ors (No 6) [2022] QLC 21*

[4] IEA (2021) *Net Zero by 2050* https://www.iea.org/reports/net-zero-by-2050

[5] Australia Government. Australia in summer 2024-2025. http://www.bom.gov.au/climate/current/season/aus/summary.shtml

The impacts—including severe floods, cyclones, and bushfires—are already costing billions, with climate-related losses in Australia projected to reach $584.5 billion by 2030[6].

Approving a new coal mine that locks in emissions until 2050 is incompatible with the EPBC Act's purpose to protect the environment, particularly in the context of current and projected climate harms.

Conclusion

The cumulative impacts of coal mining in Queensland, on ecosystems, water, climate, and communities, are not being adequately assessed or managed. The Isaac Downs Extension would exacerbate pressure on the already declining Bowen Basin ecosystem.

We urge the Department to declare this project unacceptable. Failing this, we urge the Department to declare this a controlled action due to impacts on threatened species, groundwater and climate, and require full environmental scrutiny of the impacts of the Isaac Downs Extension.

Yours sincerely,

Dave Copeman

Director, Queensland Conservation Council

[6] Kompas, T., Witte, E. and Keegan, M (2019), Australia's Clean Energy Future: Costs and Benefits, University of Melbourne