QUEENSLAND CONSERVATION COUNCIL

PROTECT CONSERVE SUSTAIN

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RE: New Lenton Coal Project Public Environment Report (EPBC 2020/8778)

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the Public Environment Report (PER) of the New Lenton Coal Project (EPBC 2020/8778).

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, many of whom are already experiencing the impacts of climate change and unsustainable development on their communities, threatened species, and landscapes.

We are alarmed by the scale of environmental destruction proposed by this project and the significant residual impacts acknowledged by the proponent. **We urge the Department of Climate Change, Energy, the Environment, and Water (DCCEEW) to reject the New Lenton Coal Project** on the basis that it poses unacceptable risks to matters of national environmental significance under the EPBC Act including water resources and threatened species and is inconsistent with Australia's climate commitments. The proponent is not suitable to develop a new project, which relies on the uncertain future of the Burton Mine project and has not addressed independent expert advice concerns in this PER.

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PROTECT CONSERVE SUSTAIN

1. Significant impacts on threatened species and ecological communities

The proposal would disturb 886 hectares (ha), including clearing 397 ha of remnant and high-value regrowth vegetation.

This includes:

- 293 ha of Greater Glider (Petauroides volans)
- 327 ha of Koala (Phascolarctos cinereus)
- 192 ha of Squatter Pigeon (Geophaps scripta)
- 112 ha of Poplar Box Grassy Woodland on Alluvial Plains

The project would clear 1.2% of the remaining Poplar Box Woodland on Alluvial Plans Threatened Ecological Community within the subregion. Both the koala and greater glider 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].

It is accepted practice in performing cumulative impact assessment that a large number of 'negligible' impacts adds up to a significant impact[2]. However, the PER does not address the cumulative impact beyond the next door Burton mine.

A much more thorough assessment of the importance of habitat and connectivity at this site to the survival of the central Queensland population of koalas, greater gliders and poplar box grassy woodlands is required before any further loss can be justified. This assessment should establish trends in population size and distribution, and thresholds for habitat loss in central Queensland. It should take into account other pressures such as mortality and the impacts of global warming, which is listed as a key threatening process in the EPBC Act. The PER does not take responsibility for the emissions produced by the mine and the coal that will be extracted.

The project will also increase the impacts of road traffic. In 2023, 145 koalas were killed on a 51 km stretch of the Peak Downs Highway[3]. Heat waves and droughts, which will be exacerbated

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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] Blakley et al, 2017, Cumulative Effects Assessment, IAIA, https://www.iaia.org/uploads/pdf/Fastips_16%20Cumulative%20Effects%20Assessment_1.pdf

[3] Schlagloth, R.; Santamaria, F.; Harte, M.; Keatley, M.R.; Geddes, C.; Kerlin, D.H. Landscape Homogeneity May Drive the Distribution of Koala Vehicle Collisions on a Major Highway in the Clarke-Connors Range in Central Queensland, Australia. Animals 2024, 14, 2902. https://doi.org/10.3390/ani14192902

by emissions from this project, directly kill koalas, and also render their food sources less nutritious.

As well as neglecting cumulative impacts, the PER relies on offsetting to mitigate impacts on MNES. Offsetting has consistently failed to deliver real biodiversity gains. The Federal Environmental Offsets Policy was introduced in 2012. In the intervening 14 years, biodiversity has continued to decline across all indicators including extent and condition of vegetation, number of listed threatened species and number of listed threatened ecological communities[4]. As former Environment Minister Tanya Plibersek noted in July 2024, "we know the current offset arrangements are broken and making nature worse."[5]

QCC supports comprehensive reform of the offsets framework to achieve better nature outcomes.

2. Unacceptable risks to water resources

The proposed mine would alter the hydrology of the Isaac River Catchment, including the Isaac-Connors sub-catchment which is part of the Fitzroy River Basin. This would involve:

- Diversion of Ti-Tree Creek and Isaac River
- Groundwater drawdown up to 10 metres
- A final void pit that will remain a saline groundwater risk

The final void poses no ecological or community benefit and carries long-term water contamination risk. This undermines community expectations of full rehabilitation and closure that returns the land to safe, sustainable use.

Given the low rates of rehabilitation success in Queensland, it is far more likely that the proposed action will leave permanent, polluting, scars on the landscape. There is also a very real risk that this project will go into care and maintenance as has occurred for other sites operated by the proponent, in which case, the disturbed landform could be left without rehabilitation.

[4] https://soe.dcceew.gov.au/biodiversity/assessments , https://www.stateoftheenvironment.des.qld.gov.au/biodiversity/terrestrial-ecosystems
[5] Cox, L., (2024) *A third of land set aside for restoration in worse state than before, Australian offset audit finds*

The PER does not assess the impacts from the site if rehabilitation is not successful. No commitments are made to long term monitoring or restitution of slumping, subsidence, vegetation failure, channel scouring or other issues that would undermine stability of the post-mining landform and result in releases of sediment and other contaminants to the Isaac River.

Despite this, the PER suggests that impacts on groundwater dependent ecosystems will be 'subtle'. Even low-level drawdown can compound existing stresses in the Fitzroy catchment. The PER appears to ignore advice from the Independent Expert Scientific Committee on Unconventional Gas Development and Large Coal Mining Development (IESC), provided to DCCEEW on 16th April 2024[6] which identified a number of deficiencies with the surface, groundwater, aquatic ecosystem and groundwater dependent ecosystem (GDE) reports.

The Surface Water and Flooding Report (Appendix 7) is dated 9th January 2024. The GDE Report (Appendix 10) is dated 14th December 2023. The Groundwater Assessment (Appendix 8) is dated 9th October 2024 but it is not clear whether any changes were made in relation to the IESC Advice. This means that the public cannot form a clear picture of the full range of impacts on our increasingly precious water resources.

The PER should be withdrawn and the IESC advice should be addressed in full. A cross referencing table provided so that the general public can be assured that the IESC advice has been dealt with.

In addition, cumulative impacts on surface water quality and the Great Barrier Reef (GBR) are not properly addressed. Given the amount of mining activities in the Fitzroy Basin, and the additional and accelerating pressures on aquatic ecosystems and the GBR from climate change (to which this proposal will contribute), a thorough cumulative impact assessment is required. This assessment should establish current conditions and trends as well as thresholds and trigger levels for damage.

In any case, 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.

[6] https://www.iesc.gov.au/sites/default/files/2024-04/iesc-advice-new-lenton-coal-2024-147.pdf

3. Climate impacts and greenhouse gas emissions

Climate pollution is a key threatening process listed under the EPBC Act. The Minister must also consider social and economic matters, and the project's contribution to climate change is a matter of profound public interest and long-term risk. The mine would extract up to 30 million tonnes of ROM coal over 18 years, yet makes no estimation of the corresponding greenhouse gas emissions.

This coal output (1.9 million tonnes per annum, Mtpa) is conveniently just below the threshold for an environmental impact assessment under the *Queensland Environment Protection Act 1994*. A previous version of the New Lenton coal mine, put forward by New Hope Corporation would produce a much higher rate of 8Mtpa ROM coal over a period of 25 years. Clearly, there is scope for a much larger mine at this location than is envisaged in the current assessment. Should this project be approved, QCC requests that strict limits be placed on the annual production and years of operation, so that the applicant cannot seek incremental extensions over time without a proper assessment of the cumulative impacts of these extensions.

The economic impacts should consider the fact that the proponent is publicly considering closure of the nearby Burton mine, which employs 500 people. Approving another mine is therefore clearly not guaranteed to provide long term economic and employment benefits. Furthermore, the proponent describe the New Lenton mine as metallurgical but it will in fact produce a mix of thermal and metallurgical coal. The proponent's own yearly reporting and accounts show that its coking coal sales were less than 60% in the last two years[7]. This places severe doubt on the ongoing economic benefits and need for the mine.

Any new coal, thermal or metallurgical, is fundamentally incompatible with Australia's commitment under the Paris Agreement to pursue efforts to limit warming to 1.5°C. Globally, a 1.5°C aligned future means no new fossil fuel projects can, or need to be approved, according to the International Energy Agency[8].

Locally, a 1.5°C 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[9].

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[7] https://announcements.asx.com.au/asxpdf/20250620/pdf/06kxzclmllytnd.pdf
[8] IEA (2021) *Net Zero by 2050* https://www.iea.org/reports/net-zero-by-2050
[9] Queensland Human Rights Commission (2023) *Case Note: Waratah Coal Pty Ltd v Youth Verdict Ltd*

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.[10] 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[11]. $171 billion of this is in Queensland. This is a conservative figure, covering reduced agricultural and labour productivity (e.g. when people can't work because of floods or heatwaves), health impacts, loss of land due to sea level rise, and impacts on infrastructure. Direct losses during natural disasters and damage to environmental assets are not covered in this estimate.

Other economic considerations include loss of jobs in the tourism sector. For example, the Great Barrier Reef, which is unlikely to survive any further warming of the planet, supports 64,000 jobs and has an estimated economic value of $AU56 billion.

Already in 2025, multiple record-breaking extreme weather events have pummelled Queensland. Estimates of damage by insurance company AON include insured losses of $233 million from north Queensland floods and $1 billion from Cyclone Alfred, and economic losses of $340 million from north Queensland flooding and $1.3 billion from Cyclone Alfred[12]. Full losses of flooding in western Queensland are not yet known, but millions of hectares of farmland were inundated, with estimates of livestock losses at half a million, with counts still rising as land dries out.

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

4. Reliance on the now uncertain Burton Mine and proponent's poor economic standing

This project sits within a heavily mined region of the Bowen Basin, adjacent to another project of the proponent's, the Burton Mine. Despite this, the PER downplays cumulative impacts on biodiversity, water, and emissions.

[10] Australia Government. Australia in summer 2024-2025. http://www.bom.gov.au/climate/current/season/aus/summary.shtml
[11] Kompas, T., Witte, E. and Keegan, M (2019), Australia's Clean Energy Future: Costs and Benefits, University of Melbourne
[12] https://assets.aon.com/-/media/files/aon/reports/2025/q1-2025-global-catastrophe-recap.pdf

Key infrastructure relied upon in the PER is located at the Burton mine:

- Washing of New Lenton ROM coal at Burton's coal handling and processing plant (CHPP)
- Transport via Burton's train load out facility
- Transfer and storage of contaminated water within Burton's existing co-disposal areas within old mine voids.

Recent industry reports indicate that Burton mine is facing potential shutdown unless additional finance can be secured[13]. If Burton mine pauses or ceases operations, the New Lenton project would require:

- New standalone processing, logistics and water infrastructure, dramatically altering its environmental footprint and impact profile
- Updated water balance modelling and cumulative impact assessments, as those currently in the PER would no longer be valid
- Additional land clearing, water extraction and emissions to address the new infrastructure to be outlined in a new PER and adequately assessed under EPBC.

None of this is included in the PER and therefore there is insufficient information to allow a reasonable decision on its environmental impacts. Should the Burton coal mine close, alternative arrangements for water management, coal handling and processing and coal transport will need to be entertained by the applicant. QCC considers that this would constitute a different action to the one currently being assessed. A new referral and new assessment would be required.

The proponent owns another mine, Bluff Mine, that is also in care and maintenance, which means that in spite of considerable surface disturbance having already occurred, no effort is being made to rehabilitate that mine. Both the situation at Bluff and the unfolding situation at Burton indicate that the proponent is not in a financial position to open another coal mine. The risk of clearing koala habitat, diverting a healthy creek and digging up the floodplain of a major river if it was then subsequently to be placed in care and maintenance without any prospect of rehabilitation and a stable, non-polluting site, far outweighs the social and economic benefit this mine would create.

13

https://www.couriermail.com.au/news/queensland/burton-mine-near-moranbah-could-be-paused-with-500-jobs-to-go/news-story/73d5378bc906132d60608641d46f179e

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Conclusion

The New Lenton Coal Project involves serious and irreversible harm to Matters of National Environmental Significance. These impacts are clearly demonstrated in the PER, and are unlikely to be acceptably avoided or offset.

We urge the Department to reject the project due to its unacceptable impacts to protected species and water resources, and its incompatibility with a safe climate future.

At a minimum, we recommend the Department seek additional information regarding the project's dependency on the Burton Coal Mine Complex. The uncertainty surrounding Burton's continued operation materially affects the validity of the New Lenton Project's environmental impact assessment.

Failing that, we recommend significantly strengthened conditions, including an independent review of hydrological modelling, a credible offsets package for all residual biodiversity impacts, a rehabilitation plan that avoids permanent final voids, and full quantification of greenhouse gas emissions (scopes 1, 2 and 3).

Yours sincerely,

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Coal and Gas Campaigner

Queensland Conservation Council