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RE: Hail Creek Open Cut (HCOC) – Eastern Margin Extension referral (EPBC 2025/10403)

Queensland Conservation Council (QCC) welcomes the opportunity to comment on the referral of the Hail Creek Open Cut (HCOC) – Eastern Margin Extension (EPBC 2025/10403) (**the Project**).

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 Hail Creek Extension** on the basis that it poses clearly 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.

At the very least, the Department must declare the project a controlled action with controlling provisions of:

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

The reasons for these conditions are laid out below.

1. Significant impacts on threatened species and communities (sections 18 & 18A)

The Project would result in extensive clearing of native vegetation, including approximately 600 hectares of high-quality koala habitat, within a Statewide Biodiversity Corridor adjoining Homevale National Park. The referral proposes clearing more than 670 hectares of native vegetation, including large areas of remnant vegetation that provide essential habitat for multiple federally listed threatened species, including:

- Koala (*Phascolarctos cinereus*) – Endangered
- Greater Glider (*Petauroides volans*) – Endangered
- Squatter Pigeon (southern) (*Geophaps scripta scripta*) – Vulnerable
- Ornamental Snake (*Denisonia maculata*) – Vulnerable
- Australian Painted Snipe (*Rostratula australis*) – Endangered

The koala habitat proposed for clearing forms part of the Clarke Connors Range population, which researchers from the University of Queensland have identified as a population of state and likely national significance, due to its size, health, and genetic distinctiveness¹.

Independent koala surveys undertaken in 2025 using thermal imaging drones recorded 13 individual koalas within approximately 160 hectares of the proposed extension area². These findings indicate a high-density, actively occupied habitat within areas slated for clearing, and demonstrate that impacts on koalas would be immediate, direct, and severe.

The referral relies heavily on offsets to address these impacts. However, offsetting has consistently failed to deliver real biodiversity gains. The Federal Environmental Offsets Policy

¹ Ellis et al, 2023, [Koalas of the Clarke Connors Range](#). *Australian Mammalogy*.

² Readfearn, 2025, [Plan to extend Queensland coalmine would bulldoze 'critical' koala habitat](#). *The Guardian*.

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 communities³⁴. As former Environment Minister Tanya Plibersek noted in July 2024, “we know the current offset arrangements are broken and making nature worse.”⁵

The Bowen Basin is one of the most heavily cleared bioregions in Queensland. This project is one of 28 new or expanded coal mine projects in Queensland and these impacts are not being considered cumulatively⁶. The loss of hundreds of hectares of connected, high-quality habitat cannot be meaningfully offset, particularly in a landscape already fragmented by mining.

The greater glider has been identified in recent research as having habitat needs which are irreplaceable on an ecologically relevant time frame⁷. This means that remnant greater glider habitat cannot be offset and must be protected from development. We urge the Department to adopt the theory and science of irreplaceability ahead of bioregional planning to ensure the survival of these species. QCC supports comprehensive reform of the offsets framework to achieve better nature outcomes.

Former Environment Minister Sussan Ley rejected the Lotus Creek wind farm after determining it would have clearly unacceptable impacts on koalas. The scale of habitat impact proposed in that case is comparable to that now proposed at the Project. This precedent demonstrates that clearing habitat critical to the survival of endangered species, particularly a nationally significant koala population, can warrant a finding of clearly unacceptable impacts.

Such a finding should be made for the Project, consistent with the Albanese Government’s commitment to prevent further extinctions.

2. Unacceptable risks to water resources (sections 24D & 24E)

The Project poses serious and enduring risks to surface water and groundwater systems within the Fitzroy Basin and the Great Barrier Reef (GBR) catchment. It would further entrench large-scale open cut mining in a region already heavily impacted by coal extraction, without adequately addressing cumulative or climate-amplified risks.

³ DCCEEW, 2021m [Statement of the Environment Report](#).

⁴ Queensland Government, 2024 [State of the Environment Report](#), Terrestrial Ecosystems.

⁵ Cox, 2024, [A third of land set aside for restoration in worse state than before. Australian offset audit finds](#), *The Guardian*.

⁶ Blakley et al, 2017, [Cumulative Effects Assessment](#), JAIA.

⁷ Ward et al, 2024, [Principles and Rules for Implementing Spatial Zoning under the EPBC Act](#), *Queensland Conservation Council*.

The proposal includes diversion of sections of Hail Creek, expansion of final voids, and long-term groundwater drawdown. The creation of multiple final voids would result in permanent alteration of groundwater regimes and pose an ongoing risk of contamination through flooding, seepage, or failure of engineered controls. These risks are heightened in the context of increasingly intense rainfall and flooding events driven by climate change.

Recent events underscore the significance of these risks. In January 2026, the existing Hail Creek mine released approximately 5,784 megalitres of mine-affected water (equivalent to more than 2,300 Olympic swimming pools) into waterways flowing toward the GBR following heavy rainfall⁸. Glencore's Annual Groundwater Monitoring Report for 2025⁹ identified elevated nutrient levels and indications of sediment and metal contamination downstream, yet Glencore has not resolved key uncertainties around water quality impacts.

The Project would also bring mining operations closer to the Brumby Waterholes, which hold cultural significance for Widi Traditional Owners and provide important aquatic habitat. There remains insufficient information regarding the groundwater regime supporting these waterholes, and the proponent has resisted installing additional monitoring infrastructure.

In addition, cumulative impacts on surface water quality and the 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.

Given the cumulative pressures on water resources in the Fitzroy Basin, and the accelerating impacts of climate change on hydrological systems, the risks posed by this Project to water resources are unacceptable and irreversible. At a minimum, the Project must be declared a controlled action with controlling provisions under sections 24D and 24E of the EPBC Act.

3. Greenhouse gas emissions and climate impacts on World Heritage properties (sections 12 and 15A), and the Great Barrier Reef Marine Park (sections 24B and 24C)

⁸ Lock the Gate Alliance, 2026, [Mines dump billions of litres of wastewater into Great Barrier Reef catchment](#).

⁹ Gauge, 2025, [Hail Creek Mine Annual Groundwater Monitoring Report](#), Glencore.

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 Project would extract up to 29 million tonnes of Run Of Mine (ROM) coal, 68% metallurgical, and 31% thermal coal. This equates to an additional 69 Mt CO₂e from the burning of coal (28% increase in Scope 3 emissions).

The project will also have unacceptable impacts on Queensland, and Australia's, carbon emissions. Independent research has identified Hail Creek as a methane super-emitter, responsible for an estimated 20% of Australia's methane emissions from coal mining while producing only around 1% of national coal output¹⁰. A more recent study using satellite and aerial measurements indicated methane emissions from the mine may be three to eight times higher than those reported by the proponent¹¹. Methane is a highly potent greenhouse gas, with more than 80 times the warming impact of carbon dioxide over a 20-year period.

The project documents note that there will be a 22% increase in scope 1 and 2 emissions, or an additional 2.83 Mt CO₂e over the project. However, a paper published by Dutch researchers in 2021¹² found that Hail Creek emitted 230,000t of methane in 2018-19. Even on a 100 year global warming potential, this is 6.44 Mt CO₂e in just one year.

More recent research from UNSW, using methane detection on planes, found that methane emissions from the mine were likely to be between three and eight times higher than figures Glencore reports to regulators.

Glencore notes that the Hail Creek Coal Mine "primarily produces metallurgical coal, with about 80% of its production being metallurgical coal (coking coal) used for steelmaking. The remaining 20% is thermal coal, which is used for power generation." However, the recent estimated coal production is considerably lower than 80% metallurgical coal, and in FY22 and FY23, Hail Creek Coal Mine produced (on average) ~60% metallurgical (coking) coal.

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

¹⁰ Sadavarte et al, 2021, [Methane Emissions from Superemitting Coal Mines in Australia Quantified Using TROPOMI Satellite Observations](#), *Environmental Science & Technology*.

¹¹ Borchardt et al, 2025, [Insights into Elevated Methane Emissions from an Australian Open-Cut Coal Mine Using Two Independent Airborne Techniques](#), *Environmental Science & Technology Letters*.

¹² Sadavarte et al, 2021, [Methane Emissions from Superemitting Coal Mines in Australia Quantified Using TROPOMI Satellite Observations](#), *Environmental Science & Technology*.

1.5°C aligned future means no new fossil fuel projects can, or need to be approved, according to the International Energy Agency¹³.

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 children¹⁴.

In 2024, the average global temperature was 1.4°C above pre-industrial levels¹⁵, with Australian sea temperatures 0.93°C above average, the warmest ever recorded¹⁶. 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 2030¹⁷. \$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 GBR, which is unlikely to survive any further warming of the planet, supports 77,000 jobs and has an estimated economic value of \$AU95 billion¹⁸.

In 2025, multiple record-breaking extreme weather events 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 Alfred¹⁹.

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. It would exacerbate climate-driven impacts on World Heritage properties and the Great Barrier Reef Marine Park.

¹³ IEA, 2021, [Net Zero by 2050](#).

¹⁴ Queensland Human Rights Commission, 2023, [Case Note: Waratah Coal Pty Ltd v Youth Verdict Ltd](#).

¹⁵ World Meteorological Organisation, 2026, [WMO confirms 2025 was one of warmest years on record](#).

¹⁶ Bureau of Meteorology, 2026, [Annual Climate Statement 2025](#), Australian Government.

¹⁷ Kompas et al, 2019, [Australia's Clean Energy Future: Costs and Benefits](#), University of Melbourne.

¹⁸ DCCEEW, 2025, [Great Barrier Reef valued at \\$95 billion, supports 77,000 jobs](#).

¹⁹ Aon, 2025, [Q1 Global Catastrophe Recap](#).

Conclusion

The Hail Creek Extension involves serious and irreversible harm to Matters of National Environmental Significance.

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

If the project does proceed to the assessment stage it should be declared a 'controlled action' and be assessed with the highest levels of scrutiny that the EPBC Act can apply with controlling provisions of sections 18, 18A, 24D, 24E, 12, 15A, 24B and 24C.

Yours sincerely,



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Queensland Conservation Council