



BHP Mitsubishi Alliance

Appendix N

Response to Public Comment Submissions

Abbreviations

BMA	BM Alliance Coal Operations Pty Ltd
DCCEEW	Department of Climate Change, Energy, the Environment and Water (Cth)
DETSI	Department of Environment, Tourism, Science and Innovation (Qld)
EA	Environmental Authority
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act 1999</i> (Cth)
FRREMP	Fitzroy Basin Regional Receiving Environment Monitoring Program
FY	Financial Year
GDE	Groundwater Dependent Ecosystem
GHG	Greenhouse Gas
IESC	Independent Expert Scientific Committee
km	kilometres
KPI	Key Performance Indicator
m	metres
MHQA	Modified Habitat Quality Assessment
MNES	Matters of National Environmental Significance
OAG	Offsets Assessment Guide
Offset Policy	EPBC Act Environmental Offsets Policy (Cth)
OMP	Offset Management Plan
PD	Preliminary Documentation
PPA	Power purchase agreement
RE	Regional Ecosystem
REMP	Receiving Environment Monitoring Plan
SME	Subject Matter Expert
SRM	Saraji Mine
TEC	Threatened Ecological Community
TESIA	Terrestrial Ecology Survey and Impact Assessment

1 Response to submissions

Following the DCCEEW issuing a Direction to Publish, BMA published the Saraji Mine Grevillea Pit Continuation Project (EPBC 2023/09757) Preliminary Documentation, inviting public comment. The documentation was available for public comment from 4th May 2026 to close of business 18th May 2026. BMA received four public comment submissions during the notification period. The submissions have been formally considered, and **Table 1** provides individual responses to the submissions received. **Attachment 1** also provides a response to the comments relating to climate and emissions concerns.

Table 1 Response to public comment submissions

Submitter Number	Submission	BMA response to submissions
1	Please accept my submission on the Preliminary Documentation (PD) for BM Alliance Coal Operations Pty Ltd.'s (BMA) proposal to develop the Saraji Mine Grevillea Pit Continuation Project to extend existing open cut mining operations into Mining Lease 700021 approximately 20 km north of Dysart, Queensland. My comments relate to the PD and Offset Management Plan (OMP), dated 4 and 5 March 2026, published on BMA's website. I have had regard for the requirements of the EPBC Act Environmental Offsets Policy 2012 (the Policy) and the How to use the Offset Assessment Guide (the Guide). As I review environmental impact assessment and management documents, I am mindful the documents are designed to secure an approval that minimises compliance cost and post-approval regulatory risk. It is for the regulator to ensure evidence-based, precautionary and enforceable decisions are made on irreversible impacts to ecosystems and species at risk of extinction. I note the Policy and Guide impose an obligation on the regulator to decide on offsets that are, amongst other requirements, informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty. I note an offset site is proposed at Croydon Station for the residual significant impacts to the Ornamental Snake, which is: - immediately adjacent to a portion of Croydon Station proposed as an offset for impacts to Koala and Greater Glider resulting from BMA's proposed Peak Downs Mine Power Line Realignment Project (EPBC 2024/09983); and - in the vicinity of an approved offset area and offset management plan for impacts resulting from BMA's Caval Ridge Mine Horse Pit Extension (CVW, EPBC 2021/9031). I consider BMA has failed to demonstrate the Croydon Station offset adequately compensates for impacts to the Ornamental Snake, and that the offset proposal should not be approved. This is because: Ornamental Snake is not present at the offset site; - the offset site is highly unsuitable; - the ecological benefit is unsubstantiated and unreliable; - MHQA indicator weightings and factors are not Policy-based;	The documents have been prepared in accordance with the <i>Environment Protection and Biodiversity Conservation Act 1999</i> (EPBC Act) Environmental Offsets Policy (Offsets Policy), Offsets Assessment Guide (OAG – the offsets calculator), and the EPBC Act. Please refer to the subsequent rows for direct responses and for where the relevant information is located in the Preliminary Documentation (PD) package.

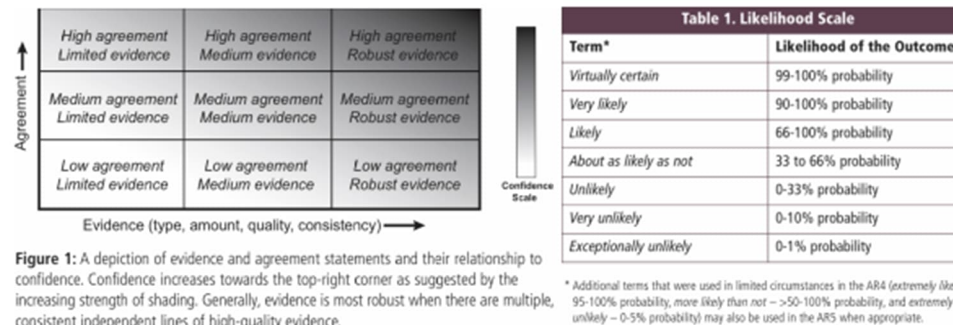
Submitter Number	Submission	BMA response to submissions
	- there is no confidence in 'confidence in result'; - performance criteria are only 'indicative'; and - the offset is not for the duration of the impact.	
	Ornamental Snake is not present at the offset site Ornamental Snake must be present, and continue to be present, at the offset site to deliver an overall conservation outcome that improves or maintains the viability of the Ornamental Snake (Policy, Principle 1). On survey results to date a precautionary assumption must be that Ornamental Snake is not present on, or in the vicinity of, the proposed offset site: - Section 3.3 of the draft OMP states 'no ornamental snakes were observed during surveys'; - Figures 5 and 7 of the draft OMP rely on snake detections from 2016 surveys, some 6kms from the northern extent of the proposed offset area; and - the approved Croydon Offset Area Management Plan for EPBC 2021/9031 did not demonstrate Ornamental Snake presence. The 2024 approval decision relied on the outdated 2016 survey results. By way of context to BMA's proposal, the 2024 EPBC Act approval for CVM does not require BMA demonstrate Ornamental Snake presence at the Croydon offset site². This is because: - Condition 29 of the CVM approval requires only that BMA achieve the 'offset outcomes' in Section 3.2 of the approved OMP, which are not enforceable outcomes but ambiguous 'management objectives'; - Section 3.2 is silent on the presence of the protected matter, and independent of Table 4, page 18 (below) which speak to species presence. The provisions of Table 4 impose no obligation on BMA to ensure the species is detected at the offset site.	BMA acknowledge that there have been no records of Ornamental snake within the Offset Area, hence the inclusion of an interim performance target, stating that Ornamental snake presence must be detected by year 5 at the Offset Area. Section 6 of the Offset Management Plan (OMP – Appendix I of the PD) details the monitoring requirements for the offset area, specifically, Table 10 of the OMP details Ornamental snake presence as a key performance indicator (KPI). Should Ornamental snake not be detected following Year 2 surveys, the listed corrective actions in Table 10 will be triggered and implemented. It is noted, since time of submission, that Ornamental snake has now been recorded at two locations within the Caval Ridge Mine Horse Pit Extension (EPBC 2021/9031) Offset Area as of March 2026, approximately 4.5km north-east of the Offset Area for this Project.

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	Table 4: Interim and final completion criteria <table><tr><th rowspan="2">Criteria</th><th rowspan="2">Baseline Score/condition</th><th colspan="3">Interim Performance Targets</th><th rowspan="2">Final Completion Score</th></tr><tr><th>Year 5</th><th>Year 10</th><th>Year 15</th></tr><tr><td colspan="6">Ornamental snake (<i>Denisonia maculata</i>)</td></tr><tr><td>Species occurrence</td><td>Species yet to be detected</td><td>Species detected</td><td>Continued species occurrence</td><td></td><td>Continued species occurrence</td></tr><tr><td>Habitat Quality (site-based attributes)*</td><td>3 (refer to Appendix A)</td><td>4</td><td>5</td><td>5</td><td>≥5</td></tr></table> Although BMA considers it 'likely that the species would utilise habitat in the Offset Area', BMA should be required to demonstrate presence of the protected matter prior to approval³. Evidence of the presence of Ornamental Snake prior to EPBC Act approval is critical to decision-making that complies with the Policy principles.	Criteria	Baseline Score/condition	Interim Performance Targets			Final Completion Score	Year 5	Year 10	Year 15	Ornamental snake (<i>Denisonia maculata</i>)						Species occurrence	Species yet to be detected	Species detected	Continued species occurrence		Continued species occurrence	Habitat Quality (site-based attributes)*	3 (refer to Appendix A)	4	5	5	≥5	
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	The offset site is highly unsuitable Table 3-8 of the PD defines and specifies the 132.32 ha of impacted Ornamental Snake habitat as comprised of 42.83 ha 'Preferred', 2.73 ha 'Suitable' and 86.76 ha 'Marginal' habitat. The offset is calculated only for impacts to Preferred and Suitable habitat types (45.56 ha). All categories are habitat types, differentiated by the value of that habitat to maintain the viability of the Ornamental Snake. Accordingly, the quality of each habitat type – including 'Marginal' habitat - should be quantified according to a scoring method. Though 'Marginal' habitat may have relatively low value, the impacted 86.76 ha is habitat and should be included in the offset calculations. There should be three calculations, one for each habitat type, with the combined 'adjusted hectares' transparently distributed across a revised offset area achieving at least the same ratio of priority - Preferred and Suitable - habitat types. Table 8-3 of the PD specifies the 356-ha offset site as comprised of 55.8 ha 'Preferred' habitat and 304.2 ha of 'Suitable' habitat. Therefore 15.6% of the offset site is 'Preferred' habitat, compared to 32% of the total impacted habitat (132.32 ha), and 94% of the habitat against which the offset is calculated (45.56 ha).	Section 4.2.3.3 of the Terrestrial Ecology Survey and Impact Assessment Report (TESIA – Appendix D of the PD) provides an extensive assessment, including via LiDAR data, of the habitat types for Ornamental snake within the Project area. Section 4.2.3.4 provides detailed assessment of habitat for Ornamental snake in areas adjacent to the Project area. Marginal habitat was assessed as having significantly increased presence of threats to the species and as being extremely limited in capacity to potentially support the species. As detailed within Section 4.2.3.6, marginal habitat within the Project area does not meet any of the listed criteria for 'important habitat', and hence for the reasons detailed in the TESI, has not been considered within the																											

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	Preferred habitat is defined as: Associated with remnant RE 11.3.3 located along ephemeral watercourses. These areas provide moderate abundance of deep soil cracks, coarse woody debris and litter. Areas containing deep, undulating depressions are also likely to provide breeding opportunities for native frogs (i.e., prey). Additional areas of preferred habitat are considered likely to occur to the east of the Study Area in association with remnant communities of the adjacent floodplains. Suitable habitat is defined as: Associated with non-remnant areas and patches of remnant and HVR RE 11.3.1 located within 1km of preferred habitat. These areas are considered suitable habitat due to reduced abundance of deep soil cracks and gilgai formations. Additionally, historical clearing and burning of areas containing 11.3.1 has substantially reduced the amount of coarse woody debris available for shelter. While lacking suitable shelter and breeding habitat, these areas may provide foraging opportunities for the species during wet periods. Given the draft OMP and habitat type descriptions, I can only conclude that the proposed offset is highly unsuitable and inadequate, and should not be approved.	significant impact assessment (refer Sections 5 and 7.3 of the TESIA for details). The offset site has hence been selected to compensate significant impacts to preferred and suitable Ornamental snake habitat types. The offset site has been selected in accordance with the Offset Policy, OAG and relevant DCCEEW conservation advice documents, as described in OMP (see Section 2.4, Appendix A – Offset Assessment Guide and Appendix D – OMP alignment with Commonwealth policy).
	The ecological benefit is unsubstantiated and unreliable The 100.1% direct offset calculated at Appendix 1 of the OMP asserts with 80% confidence a one point improvement to habitat quality over 20 years. However, BMA does not provide evidence supporting that assertion, specifically BMA does not: - specify the MHQA parameters that it will maintain and/or enhance across the offset site to benefit the species, and that will increase the MHQA score by one point (out of 10). Specifically, which biocondition attribute or attributes will BMA modify to improve the viability of the species at the offset site? - specify the management actions it will implement across the offset site to maintain and/or enhance the above MHQA parameters. There must be an evidence-based relationship made between the proposed management action/s and the MHQA parameters BMA will improve to benefit the species;	Appendix C – Habitat Quality Data of the OMP has been amended to include further detail on how the habitat quality scores have been calculated. This includes adding information that demonstrates the alignment of methodology with the Queensland <i>Guide to determining terrestrial habitat quality</i>, as previously referenced within the OMP, and details of attributes that were utilised for weighting scores. Please refer to Section 5.1 and Appendix C – Risk Assessment for the key risks identified with completing the management actions and hence the success of the offset site. The 80% confidence in the result detailed within

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	- provide evidence that the proposed management actions will, within 20 years, maintain and/or enhance the correlated MHQA parameters, so as to combined increase the MHQA score by one point (out of 10); and - outline the scientific uncertainty associated with the effectiveness of proposed management actions to achieve the desired future quality, and the basis on which BMA derived 80% confidence in result. <u>The proposed 356 ha offset area is calculated on a one point gain that is reliant on a start quality of 6/10.</u> I have reviewed Section 3 and Appendix C4 of the OMP and cannot determine how the start quality of 6/10 was calculated using the MHQA. For example, extracts from MHQA worksheets pasted into Appendix C do not lead the reader to an area weighted average rounded score of 6/10. <u>This should be explained and detailed by BMA.</u> To compensate for inadequate site habitat quality assessments to date, BMA has committed to a 'Year 0 assessment for ornamental snake habitat quality in the Offset Area' that 'will be undertaken upon Project approval and will be in accordance with the Habitat Quality Guide'. BMA's proposal to conduct habitat quality surveys only following EPBC Act approval to proceed with the action, gives BMA scope to discount its offset management commitments and obligations. There is a high risk BMA will, as with the recent offset proposal for EPBC 2024/09983, 'round down' the MHQA start quality score to a whole number, and 'round up' the MHQA future quality score to a whole number, to reduce BMA's offset management obligations. To explain, BMA's recent offset proposal for EPBC 2024/09983: - rounded Koala habitat start quality from 7.34/10 to 7/10, and the estimated future quality from 7.63/10 to 8/10, delivering BMA a one-point gain for a 0.29-point difference – i.e. a 71% discount on its offset obligations; and - rounded Greater Glider habitat start quality from 7.17/10 to 7/10 and the estimated future quality from 7.54/10 to 8/10, delivering BMA a one-point gain for a 0.37-point difference – i.e. a 63% discount on its offset obligations. BMA's offset proposal, and recent use of the MHQA and offset calculator for EPBC 2024/09983, presents an unacceptable risk that BMA will implement habitat quality improvements across a 'pre-approved' offset site that do not equate with a one-point improvement.	Appendix A of the OMP was derived from these risks. Section 4.2 and Section 4.3 of the OMP provides proposed management actions to be implemented to achieve the offset site objectives, and hence the Modified Habitat Quality Assessment (MHQA) parameters. BMA have completed offset calculations and modelling in accordance with the Offsets Policy and the OAG. Please refer to Appendix A – Offset Assessment Guide and Appendix C – Habitat Quality Data of the OMP for further information.

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	MHQA indicator weightings and factors are not Policy-based I am not confident BMA's proposed habitat quality assessments will comply with the Guide, and therefore the Policy. The quality scoring method is central to assessing the suitability of direct offset proposals - a function performed by the regulator. <i>The Offsets assessment guide is a tool that has been developed for expert users in the department to assess the suitability of offset proposals. The guide is also available to proponents to assist with planning for future development proposals and estimating future offset requirements. (Page 4)</i> It follows that quality scores selected by the Department (not BMA) are by using a method and metrics developed by the Department in consultation with independent subject matter experts (e.g. academics, researchers) and end users. The BMA should not be usurping the Department's role by deciding the habitat quality scores prior to or following approval. The Guide states: <i>The quality score for area of habitat or area of community is a measure of how well a particular site supports a particular threatened species or ecological community and contributes to its ongoing viability ... It is important to note that the assessment of quality for threatened species habitat and ecological communities is not simply a scoring of vegetation 'pristineness'.</i> <i>There are three components that contribute to the calculation of habitat quality: site condition, site context, and species stocking rates.</i> <i>These components contribute to the final habitat quality score ... however the weighting given to each component is dependent on the ecological requirements of the impacted species or ecological community. For example, for some species the most important consideration is the location of a site in the landscape, whereas for others the presence of important habitat features on the site itself may be the most important influencing factor.</i> The Guide does not 'weight' the three components, only that each must be considered. Neither does the Guide specify that the weighting be numerical, thus it may be conceptual for differentiating whole numbers between 0 and 10, such as at Attachment O of the EPBC Act approval for EPBC 2019/8437. Scoring factors that relate to both condition and context, such as feral pig impacts and controls, should be avoided because it discounts impact site quality and exaggerates offset benefits.	Noted. Habitat quality assessments and weightings have been completed in accordance with MHQA Biocondition Assessment methodologies, as described within the OMP. Appendix C – Habitat Quality Data of the OMP has been amended to include further detail on how the habitat quality scores have been calculated. Relevant data and assessment have been provided to DCCEEW.

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	No confidence in confidence in result. The PD and OMP are intended to inform decision-making by the Minister or delegate. This includes adequately explaining the proposal and identifying and addressing scientific uncertainty. Relevantly: • Principle 7 of the Policy states suitable offsets must: be efficient, effective, timely, transparent, scientifically robust and reasonable; and • Principle 9 of the Policy states in assessing the suitability of an offset, government decision-making will be informed by scientifically robust information and incorporate the precautionary principle in the absence of scientific certainty. Unfortunately, the PD and OMP fail to adopt any industry standard, regulator approved, or authoritative framework to evaluate the evidence and knowledge provided by BMA to support the claimed offset outcomes, and on which to select a precautionary confidence in result. I recommend the confidence in result be derived by applying the Intergovernmental Panel on Climate Change's (IPCC) July 2010 Guidance Note on Consistent Treatment of Uncertainties⁵, particularly the Agreement/Evidence matrix in Figure 1 of the Guidance.  Figure 1: A depiction of evidence and agreement statements and their relationship to confidence. Confidence increases towards the top-right corner as suggested by the increasing strength of shading. Generally, evidence is most robust when there are multiple, consistent independent lines of high-quality evidence. <table><caption>Table 1. Likelihood Scale</caption><tr><th>Term*</th><th>Likelihood of the Outcome</th></tr><tr><td>Virtually certain</td><td>99-100% probability</td></tr><tr><td>Very likely</td><td>90-100% probability</td></tr><tr><td>Likely</td><td>66-100% probability</td></tr><tr><td>About as likely as not</td><td>33 to 66% probability</td></tr><tr><td>Unlikely</td><td>0-33% probability</td></tr><tr><td>Very unlikely</td><td>0-10% probability</td></tr><tr><td>Exceptionally unlikely</td><td>0-1% probability</td></tr></table> * Additional terms that were used in limited circumstances in the AR4 (extremely likely - 95-100% probability, more likely than not - >50-100% probability, and extremely unlikely - 0-5% probability) may also be used in the AR5 when appropriate. The IPCC Guidance provides 'a common approach and calibrated language ... for developing expert judgments and for evaluating and communicating the degree of certainty in findings ...' albeit for the 2014	Term*	Likelihood of the Outcome	Virtually certain	99-100% probability	Very likely	90-100% probability	Likely	66-100% probability	About as likely as not	33 to 66% probability	Unlikely	0-33% probability	Very unlikely	0-10% probability	Exceptionally unlikely	0-1% probability	The OMP has been developed in accordance with requirements under the EPBC Act, this includes under the Offset Policy (refer Section 2.4 and Appendix D of the OMP (Appendix I of the PD Head Document)). Refer to Section 5 of the OMP for the Offset Completion Criteria and Section 6 of the OMP for offset monitoring activities to measure the success of the management actions to meet the completion criteria. Further, Key Performance Indicators are provided in Table 10 of the OMP. Please refer to Section 5.1 and Appendix C – Risk Assessment for the key risks identified with completing the management actions and hence the success of the offset site. The 80% confidence in result detailed within Appendix A of the OMP was derived from these risks. The information and assessment presented within the OMP are considered to provide confidence in the success of the OMP objectives.
Term*	Likelihood of the Outcome																	
Virtually certain	99-100% probability																	
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	Fifth Assessment Report6. It relied on 'two metrics for communicating the degree of certainty in key findings ...': 'confidence in the validity of a finding, based on the type, amount, quality, and consistency of evidence'; and 'quantified measures of uncertainty in a finding expressed probabilistically'. I could not locate in the PD or OMP measurable completion criteria for a future habitat quality score of 7/10, nor evidence and 'independent agreement' that supports the 80% confidence of attaining the proposed completion criteria. Given the PD and OMP lack information that would be required for evidence-based decision-making, an alternate plausible confidence in result value for the Year 20 completion criteria might be 50%, i.e. 'about as likely as not', meaning the proposed 356 ha offset provides only 63% of the direct offset for 27.34 'adjusted hectares'.  The above shows it is a non-trivial matter to decide an appropriate, i.e. precautionary, confidence in result value. Failure to do so without scientifically robust information and/or accounting for uncertainty, risks a net loss to the protected matter.	
	Performance criteria are only 'indicative' Table 8 of the OMP, titled 'Completion criteria and interim performance targets for the Offset Area', specifies by Year 5 of the OMP the Ornamental Snake is to be detected at the site and, at and from Year 10, the species is detected and the habitat quality score is increased from 6/10 to 7/10. Section 5 qualifies the 'interim performance targets' in Table 8 – which includes species presence - as 'indicative7'. As	Noted. Ornamental snake is required by the OMP to be observed within the offset area. The species presence must be detected at year 5 at the offset area. Table 10 of the OMP provides the corrective actions that will be triggered should Ornamental snake not be observed by year 2. Further, the interim

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	discussed above, this is not a commitment. If the species remains undetected there is little/no scope to trigger the requirement for an alternate suitable offset site. <i>Table 8 Completion criteria and interim performance targets for the Offset Area</i> <table><tr><th rowspan="2">Criteria</th><th rowspan="2">Baseline Score</th><th colspan="3">Interim Performance Targets</th><th rowspan="2">Completion Score Year 20</th></tr><tr><th>Year 5</th><th>Year 10</th><th>Year 15</th></tr><tr><td colspan="6">Ornamental snake (<i>Denisonia maculata</i>)</td></tr><tr><td>Species occurrence</td><td>Not recorded during baseline surveys</td><td>Species detected</td><td colspan="2">Continued species occurrence</td><td>Continued species occurrence</td></tr><tr><td>Habitat quality score</td><td>6</td><td>6</td><td>7</td><td>7</td><td>7</td></tr></table> Section 5 also states: ‘It is noted that a Year 0 habitat quality survey event will be undertaken within the Offset Area to provide the appropriate benchmark (or baseline) for ongoing monitoring and evaluation through the duration of the offset’. This indicates surveys to date are not suitable for determining a habitat quality start score and setting feasible timebound values for habitat parameters to achieve the future score with offset. ‘Should the completion criteria not be achieved within 20 years, the frequency of ongoing management will be determined by a suitably qualified ecologist.’ This is an incomplete response, as it should include calculating a larger offset area, revising the OMP, and extending the period of the OMP to ensure the completion criteria and/or conservation gain is achieved over the revised offset area. The nature and timeframes for BMA’s proposed corrective actions (Table 10) will inevitably delay offset delivery. There is an unacceptable risk that the Ornamental Snake is not present at the offset, that it will not be detected at the offset site during the period of the OMP, and that there will be no regulatory response and/or practical means of substituting the site with an offset containing the Ornamental Snake.	Criteria	Baseline Score	Interim Performance Targets			Completion Score Year 20	Year 5	Year 10	Year 15	Ornamental snake (<i>Denisonia maculata</i>)						Species occurrence	Not recorded during baseline surveys	Species detected	Continued species occurrence		Continued species occurrence	Habitat quality score	6	6	7	7	7	targets have been developed to assist in measuring positive progress to the completion criteria and allows for adaptive measurement to intervene should the interim milestones not be achieved. The details of monitoring and progress towards the KPIs and completion criteria detailed within the OMP will be reported to DCCEEW per Section 8 of the OMP (Appendix I of the PD), giving the Department oversight on progress and the opportunity to provide input where required. This mitigates the risk of not achieving completion criteria at year 20.
Criteria	Baseline Score			Interim Performance Targets				Completion Score Year 20																					
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Ornamental snake (<i>Denisonia maculata</i>)																													
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Habitat quality score	6	6	7	7	7																								
	Offset is not for the duration of the impact Related to Policy Principle 2, the Policy states:	The OMP details reporting requirements that are aligned with the Offset Policy, particularly sections 4.2 and 7.2.1 of the Offsets Policy. Refer to Section 8 of the OMP for specific																											

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	<i>'Offsets should compensate for an impact for the full duration of the impact' and '... as a result of offsetting will instead be protected in an enduring way and actively managed to maintain or improve the viability of the protected matter. In these cases, the tenure of the offset should be secured for at least the same duration as the impact on the protected matter arising from the action, not necessarily the action itself.'</i> As the offset entirely relates to attaining and maintaining habitat quality improvement, it follows that maintenance of future quality with offset should be reported for the period of effect of the approval and not be limited to the period of the offset management plan. The OMP states: <i>Securement of the Offset Area as Category A area using a Voluntary Declaration (VDec) ... , as well as via a covenant pursuant to the Land Act 1994, will ... protect the Offset Area from:</i> <i>- future changes in legislation which could result in reduced protection; and</i> <i>- future clearing, including clearing of the currently-mapped Category B regulated vegetation that could potentially be undertaken as Exempt Clearing Work or under future approval.</i> I am concerned the above does not commit BMA to enduring offset outcomes and protection. This is because it does not: - commit to protecting the future habitat quality from, for example, excessive grazing pressure and reduced pest and weed invasion post the period of the OMP; and - explain Land Act processes and obligations that apply to landowners/managers to prevent Ornamental Snake habitat quality decline post the period of the OMP.	reporting requirements, and Section 4.3.1 for details on the commitment to securing the offset site legally. The offset outcomes and protection within the OMP have been developed in accordance with the Offsets Policy and in consultation with DCCEEW. Refer to Section 4.2.2, Table 7, and Section 4.3.1 of the OMP for the proposed securement of the offset area.

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	Concluding remarks On information provided in the PD and OMP, I consider the offset proposal severely inadequate and non-compliant with Policy Principles 1, 2, 4, 5, 7, 8, 9 and 10. The scale and severity of the failure of the offset proposal to address the Policy requirements means that the action should not be approved at this time – including with a post-approval requirement to prepare and submit a OMP for approval. BMA should prepare a revised offset proposal for consultation with stakeholders and submitting parties. Only when that proposal complies with the Policy should the Department consider approving the action, then with a condition that requires post-approval preparation and public review of a draft OMP in accordance with Section 134A of the EPBC Act.	The OMP has been developed in accordance with the Offset Policy (refer Section 2.4 of the OMP). The OMP has been released for public viewing in accordance with DCCEW assessment requirements.
2	The Saraji Mine Grevillea Pit Continuation (SMGPC) involves extending the footprint of the existing Grevillea Pit beyond ML 1782 into ML 700021. The total disturbance area is 220 hectares (ha) and will result in additional final void volume. The SMGPC will facilitate extraction of an additional 55 million tonnes (Mt) of coal over a 30 year period, up to FY2055. This proposal comes at a time when it is clear that a global retreat from fossil fuels is the only way to prevent catastrophic global warming and climate change.¹ It is inferred that the SMGPC will produce “hard coking coal”, however the exact mix is not provided. The SMGPC is a controlled action under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act), with the assessment approach being ‘preliminary documentation. Controlling provisions are: - Listed threatened species and communities (section 18 and section 18A); and - A water resource, in relation to coal seam gas development and large coal mining development (section 24D and section 24E). While impacts on these matters are clearly central to any decision to refuse or approve SMGPC, social and economic considerations are also relevant to any decision. I am an environmental practitioner with 35 years of experience in environmental assessment, management and policy in Australia and overseas.² I hold a Bachelor of Science and Masters in Environmental Studies from the University of Melbourne and a PhD (environmental impact assessment	Noted. There has been extensive technical assessment and documentation provided for the Project in the form of the PD Head Document and appendices. These assessments have been undertaken by respective subject matter experts (SMEs) in each field, and have been completed across many years. The works have been scrutinised through independent peer reviews and technical specialist peer reviews. The conclusions made within the PD package of the anticipated impacts likely resulting from the Project are the outcomes of these intensive assessments by respective SMEs.

Submitter Number	Submission	BMA response to submissions
	as a policy tool) from Griffith University. My experience includes preparation of environmental impact statements under Queensland and Commonwealth legislation, as well as international guidelines and as a Senior Lecturer in environmental policy and management at University of Bristol (2018-2024). I am a member of, and trainer for the International Association of Impact Assessment. I am a Fellow of the Environment Institute of Australia and New Zealand and a longstanding member of the Impact Assessment Special Interest Section. I consider that the SMGPC must be refused when considered under the decision-making framework set out in Section 3A of the EPBC Act. In particular: - The SMGPC will result in further biodiversity loss both through direct and indirect impacts, including contribution to climate change. The SMGPC will exacerbate the ongoing and seemingly irreversible decline in biodiversity in Australia. - Insufficient evidence has been provided to demonstrate that the SMGPC will not cause ongoing negative impacts on downstream water quality and flows. Water quality objectives are not currently met in the local area, and consistent with the need to prevent degradation of biological diversity and ecological integrity, there is no justification for adding further contaminants to this system. - A cost-benefit analysis of the proposal would show that it has negative impacts on the Australian economy and wellbeing of Australians.	
	1 BIODIVERSITY 1.1 Contribution of the SMGPC to pressures on biodiversity are ignored Section 3A(d) of the EPBC Act requires that “the conservation of biological diversity and ecological integrity should be a fundamental consideration in decision – making”. In spite of the apparent level of modification at the SMGPC site, biodiversity at the site is high, with the PD stating that: “A total of 62 native fauna species, including 43 birds, eight reptiles, six mammals and five amphibians were recorded opportunistically and during targeted surveys across the Project area” (page 41) This includes at least two endangered and two vulnerable species.	Noted. For clarification, one species listed under the EPBC Act was recorded within the Project area, being the Ornamental snake (<i>Denisonia maculata</i>). No other fauna or flora species listed under the EPBC Act have been identified in the Project area. The TESIA (Appendix D of the PD) provides detailed information and analysis on the ecological values across the Project area. The values, present and potential future, have been also analysed within this technical document (see for example in Sections 3.2.6.2

Submitter Number	Submission	BMA response to submissions
	Habitat values on the site are dismissed because of fragmentation. This should not be used as an excuse to allow further habitat loss. These fragments are opportunities to allow regrowth and develop habitat. Further, the extent of clearing, modification and fragmentation in the area already, including the complete destruction of habitat from open cut coal mining, is used as an excuse to destroy just a little bit more, when in fact this is a reason to retain existing habitat, however modified. The SMGPC will result in loss of: 132.32 ha of vulnerable ornamental snake habitat 150.45 ha of brigalow regrowth, which, if left in situ would obviously mature and help to replace the massive losses of brigalow that have occurred due to coal mining in the region 11.29 ha of endangered koala habitat. Understanding of the status of and importance of the central Queensland koala population is lacking, however it is likely to be trending downwards, particularly in the light of massive losses of koala habitat from existing and proposed coal mines.³ In the absence of a regional cumulative impact assessment, the loss of any koala habitat must be considered significant. SMGPC will also have indirect impacts on glider habitat along Phillips Creek, including an important movement corridor (see also Section 1.2). Again, in the absence of information on the central Queensland greater glider population, any potential impact must be considered significant. The significance of any impacts on biodiversity must be framed in terms of the biodiversity crisis facing Australia. The Australian government State of the Environment (SoE) Report 2021 graded Australia's biodiversity as poor and deteriorating, due in large part to increased land clearing, invasive species and the effects of anthropogenic climate change, to which the SMGPC will make a substantial contribution.⁴ Given the long term downward trend in terrestrial biodiversity in Queensland, the contribution of the coal mining sector to that trend, and the amount of habitat destruction currently underway for coal mining projects in central Queensland, the cumulative impacts of SMGPC must be considered unacceptable. The Australian SoE report also identifies climate change in the form of more severe drought, extreme weather events, fire and habitat modification as an increasingly important new driver for habitat change and species loss.⁵ The SMGPC will add to the major contribution that Saraji Mine makes to the accretion of GHGs in the atmosphere (see also Section 3.2).	and 3.2.6.3 of the PD Head Document which provides this detail on Greater glider and Koala). Both Greater glider and Koala have consistently been observed along the Phillips Creek corridor, alongside mining activities. Refer to Table 5-5 in Section 5.1.5 and Section 5.1.5.1 of the PD Head Document for further detail on the management and monitoring measures to be implemented as part of the Project. Section 4.2 of the TESIA (Appendix D of the PD) also provides detail on historic and ongoing land usage of the Project area, and discusses the existing values within the Project area and how they relate to Matters of National Environmental Significance (MNES).

Submitter Number	Submission	BMA response to submissions
	Further impacts on biodiversity are clearly inconsistent with the objectives of the EPBC Act, and if the decision-making framework set out in Section 3A is to be honoured, the SMGPC should be refused.	
	1.2 Phillips Creek is highly significant and will be further impacted Phillips Creek is an important riparian corridor. It provides one of three undisturbed east-west movement corridors across the 55km swathe of open cut mines extending north-south between Moranbah and Dysart and is clearly highly utilised by endangered gliders and many other species. It is also identified as a groundwater dependent ecosystem, making it sensitive to any changes in hydrology and hydrogeology. While direct impacts on Phillips Creek have been avoided, it is subject to changes to hydrological and hydrogeological conditions if the SMGPC goes ahead. Existing mining activities are already impacting Phillips Creek, including through groundwater drawdown, and the proposed Saraji East Mining Lease Project, if approved, will also have significant impacts, particularly through subsidence. As is common in environmental assessments of mining projects, impacts on Phillips Creek from SGMPC are discounted on the basis that any impacts are very small in the context of existing impacts. This conclusion is disputed on two grounds. Firstly, it ignores the importance of Phillips Creek as one of the last intact east-west movement corridors across a 55km barrier that has been created by open cut coal mining. Any loss of riparian vegetation, or disturbance from adjacent noisy, dusty activities, might reduce the value of this corridor. Secondly, the reason for undertaking cumulative impact assessment is precisely because the sum total of large numbers of small changes can result in ecosystem collapse, even if the each of the individual changes is not large. No attempt is made to assess the likely thresholds beyond which a system such as Phillips Creek can no longer provide viable habitat and hence it cannot be concluded that an additional impact, however small, does not cross that threshold. No mention is made in the preliminary documentation of the significant downward trends in biodiversity, and in populations of individual species of conservation significance. If this context is considered, the aquatic and riparian habitat of Phillips Creek is clearly of critical importance if biodiversity loss in central Queensland is to be addressed, and must not be subject to any further stressors.	Portions of Phillips Creek riparian corridor have been subject to disturbance from watercourse diversions, agricultural activities and mining activities that have influenced a large tract of the corridor over the last 50 years (at minimum). BMA recognises that the corridor provides important movement and dispersal opportunities for flora and fauna. The Project area has taken the importance of Phillips Creek into account, where proposed mining has avoided removal of the creek, and setbacks of 100m-150m between the Phillips Creek riparian corridor and the Project area boundary have been included. The Project proposes to complete monitoring along sections of Phillips Creek adjacent and proximal to the Project to ensure potential indirect impacts are monitored and managed appropriately (please refer to Section 5.1.5.1 of the PD Head Document for details on monitoring). It is noted that Koala and Greater glider have been consistently recorded in habitat directly adjacent to active operational areas at Saraji Mine (SRM). Several sightings of the two species have been recorded between 2018 to 2024 during ecological field surveys along the Phillips Creek riparian corridor (refer to Sections 4.2 and 5.2 of the TESIA in Appendix D).

Submitter Number	Submission	BMA response to submissions
	It is critical that Phillips Creek is maintained in perpetuity as a connection across what are likely be permanently denuded landscapes. Further disturbance, whether from direct or indirect impacts should not be allowed, consistent with Section 3A(d) of the EPBC Act.	The documented persistence of both Koala and Greater glider in habitat immediately adjacent to active mining operations supports the conclusion that behavioural disturbance is likely to be minor and temporary, with local populations capable of utilising adjacent habitat despite ongoing operational noise, light and dust. Further, negligible impacts to Phillips Creek as a result of groundwater drawdown were identified – refer to Section 4.3.3 of the PD for specific details including the results of cumulative impact assessment. The Groundwater Dependent Ecosystem (GDE) Impact Assessment Technical Report (Appendix H) concluded that no significant impacts to GDEs are likely, however, in line with the precautionary principle to validate the conclusions made within the Groundwater Impact Assessment Report (Appendix F) and GDE Impact Assessment Technical Report (Appendix H) and respond to unforeseen outcomes, a Groundwater Dependent Ecosystem Monitoring and Management Plan will be implemented and the SRM Groundwater Monitoring and Management Plan will continue to be implemented. Refer to Section 4.3.3 of the PD and Appendix J for the monitoring program details.
	1.3 The inadequacy of offsets	Loss of connectivity and movement opportunity along Phillips Creek riparian corridor for Koala is not anticipated as part of

Submitter Number	Submission	BMA response to submissions
	At this stage, BHP is only offering offsets for loss of ornamental snake habitat. However, even if offsets were also provided for koala habitat loss and loss of connectivity along Phillips Creek, the offsets strategy put forward does not address the serious concerns about the effectiveness of biodiversity offsets. The EPBC Offsets Policy was introduced in 2012. In the intervening 16 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.⁶ Recently published studies in Australia⁷ and overseas⁸, all highlight significant failings in offsetting. Issues range from lack of permanent legal protection, threat of bushfire and other climate-induced natural disasters, and limited evidence that biodiversity increases in offset areas, or that offset areas are recolonised by the target species. A recent study by Tran and Maron (2025) also identified a wide range of issues with under-estimating offset area requirements, overstating benefits in offset areas and double counting of offsets.⁹ Studies demonstrating the effectiveness of offsets in maintaining and protecting biodiversity could not be found. Should the SMGPC be allowed to proceed, BHP should be required to offset all habitat loss, and to have all offsets in place and demonstrate that a genuine offset has occurred before it is allowed to start any ground disturbance. However, a better outcome for biodiversity would be to avoid any further direct and indirect disturbance to habitat by refusing the SMGPC.	the Project. As per the previous comment response, the Project proposes to complete monitoring along sections of Phillips Creek adjacent and proximal to the Project to ensure potential indirect impacts are monitored and managed appropriately (please refer to Section 5.1.5.1 of the PD Head Document for details on monitoring). An offset area to compensate the identified significant impacts to Ornamental snake has been selected and the OMP has been developed in accordance with the Offsets Policy (refer to Section 1.3 of the OMP – Appendix I). Section 8.3.1 of the PD Head Document provides planned legal security over the offset area.
	2 MINE WATER MANAGEMENT Impacts on surface water quality from mine affected water (MAW) and releases of sediment-laden water are glossed over on the basis that MAW and runoff from disturbed areas will be managed via the existing Saraji Mine water management system and erosion and sediment control (ESC) system. It is concluded without evidence that the additional impacts are negligible on the basis that there will be minimal change to the current systems. In order to assert that there is no impact from continuation of an existing mine, it must first be demonstrated that the current mine is not causing an impact. This assessment is not provided. Instead, the PD maintains that because the Saraji Mine operates in accordance with an environmental authority issued under the Queensland Environment Protection Act 1994, that it is not having any impact.	The Project does not propose a change to, or additional, release points at SRM. Existing release points for mine affected water at SRM are listed in Appendix C of the PD. As the mine progresses, operations will shift and include updates to the water management plan and erosion and sediment control measures (refer to Appendix J of the PD for the current versions). The management and release of MAW is authorised and regulated under the Environmental Authority (EA) for SRM. If, as the mine progresses, any of those EA conditions are required to change BMA will

Submitter Number	Submission	BMA response to submissions
	In fact, environmental authority EPML00862313 only places limits on electrical conductivity and pH for MAW releases. Trigger levels are specified for a small subset of contaminants (Al, Cr, Cu, Fe, U, ZN and TPH), with no limits on other contaminants of concern such as nutrients or fine sediment. Compliance with trigger levels is checked after the release commences, and even if trigger levels are exceeded, there is no requirement to stop the release, only to write a report after the exceedance of the trigger level has been discovered. No information is provided on the contaminant levels in either the existing MAW streams, or with the addition of MAW from SMGPC. The geochemical composition of MAW also needs to be described. Given that a substantial proportion of MAW generated at SMGPC is derived from groundwater, and that stormwater runoff will have been in contact with mine waste, it is likely that MAW has a different geochemical composition compared to natural surface waters. This has been identified as an impacting factor for freshwater ecosystems and needs to be assessed further.¹⁰ A thorough analysis of the performance of the existing MAW and ESC systems is required, as well as an analysis of the condition of the downstream receiving environment. There are a number of reasons to be concerned about additional load on the MAW and ESC systems at Saraji Mine. In relation to MAW, it is noted that from 12th January 2026 to 14th March 2026, there were almost continuous discharges of mine affected water from various authorised release points at Saraji Mine, amounting to 1,720 ML of releases. ¹¹ BHP also required a Temporary Emissions Licence (TEL101015656) to manage the water inventory at Saraji Mine by authorising releases outside the triggers set in the EA. TEL101015656 authorised releases from RP(TEL1), Dogwood and Ebony Pit into One Mile Creek Diversion from 16th January 2026 to 14th March 2026. Releases also occurred in 2025. Clearly, rain events have a significant impact on water management system at Saraji raising concerns that discharges may be more frequent and prolonged than implied in the PD, even without the addition of SMGPC. This lack of clarity about MAW management is also of concern given previous issues that BMA has had with MAW at South Walker Creek (Stat-1231), Blackwater (Stat-E-10008311-1) and Goonyella Riverside (Stat-1208_1). In relation to ESC, BHP was issued with a Notice to Conduct an Environmental Investigation in 2019 (STAT1324/CR61886) for Saraji mine. The Saraji Mine EA EPML00862313 was amended at some stage to add Conditions F36, F37 and F38, F39 and F40 relating to studies and development of management	submit an appropriate application to the Queensland Department of Environment, Tourism, Science and Innovation (DETSI) for consideration. Receiving Environment Monitoring Plans (REMPs) and now Fitzroy Basin Regional Receiving Environment Monitoring Program (FRREMPs) provide ongoing environmental monitoring at a catchment scale, establishing and building on environmental trends. Sections 4.2.2.4 <i>Water Quality</i> and 5.2 <i>Water Resources</i> of the PD Head Document details the current (i.e., without the Project) water quality results, and ongoing water management measures. The cumulative impact assessment has been completed with regard to data available at the time collected from BMA monitoring points and FRREMP monitoring locations. Refer to Table 4-3 of Section 4.2.4.5 of the PD Head Document (also in Section 8.4 of Appendix E of the PD). Flood Modelling was undertaken and mitigation measures are provided in Appendix E of the PD. Flood protection levees are to be installed along the southern boundary of the Project area, and at the breakout path location on the existing Spring Creek diversion to prevent flood ingress (refer to Section 4.2.3 <i>SRM Surface Water Management</i> of the PD Head Document). It is noted that Temporary Emissions Licence (TEL) were required to manage water at SRM

Submitter Number	Submission	BMA response to submissions
	plans and works plans to address issues with water management at Saraji. The studies for the new water management plan and ESC plan are not required to be completed until January 2027, and no deadline is set for implementation, so it is not clear whether the issues have been resolved. Additional inputs to the ESC system from an expanded mine footprint will exacerbate existing issues. Sediment releases were also an issue at Blackwater Mine when it was owned and operated by BMA. Specifically, releases of sediment occurred from the mine into adjacent watercourses for a period of over a decade without action being taken (STAT-E-100008311, C-CPLPO-100315200; 101/0000140). Returning to the impacts of SMGPC on downstream watercourses, the BHP seeks allowance to continue to have impacts on the receiving environment out to 2055. No assessment is provided of the impacts of prolonging MAW discharges or releases from the ESC system. The PD for SMGPC also fails to mention that the proposed Saraji East Mining Lease Project (SEMLP) will also add to the inventory in the Saraji Mine MAW and ESC management systems. This approach to mine water management at SEMLP was the result of a last minute change by BHP and has not been properly assessed: neither the SEMLP EIS nor the more recent environmental authority application for SEMLP provided any assessment of the impacts on the Saraji Mine MAW or ESC systems from transfer of water from SEMLP. Clearly it is critical to understand how Saraji Mine water management systems will cope with additional inputs from both SEMLP and SMGPC before any conclusions can be drawn regarding the level of impact. Notably, both existing Saraji mine and proposed SMGPC and SEMLP are located in a catchment that flows to the Great Barrier Reef (GBR), which is particularly sensitive to fine sediment and nutrient loads and yet no information is provided on this. Once again, cumulative impacts are dismissed on the basis of being very small additions to existing impacts. A cumulative impact assessment requires establishment of trends in the environmental values of the receiving environment as well as considerations of thresholds below which values should not be allowed to be degraded. This then provides the framework for determining whether small incremental changes are acceptable. This information is not provided. Further, as water quality objectives are not currently being met, this would seem to indicate that impact thresholds have already been reached, and prolongation of contaminant releases or other changes (eg flow reductions) should not be allowed.	during early 2026. This was following significant rainfall events and managed with the Regulator, DETSI. Any other mine affected water releases are managed in accordance with the SRM EA, as detailed within Section 7.4.2 of the Surface Water Assessment Report (Appendix E of the PD) and <i>Schedule F: Water</i> of the SRM EA (Appendix C of the PD).
	3 THE SMGPC WILL HARM OUR ECONOMY AND WELLBEING IN THE SHORT AND LONG TERM	Section 9 (Table 9-1) of the PD Head Document demonstrates the Project

Submitter Number	Submission	BMA response to submissions
	Section 3A(a) of the EPBC Act requires economic, social and equity considerations to be integrated into decision-making. The economic and social benefits of the SMGCP have been overstated, and in fact, when the contribution of the SMGCP to the accretion of greenhouse gases (GHGs) in the atmosphere is considered, will likely detract from the economy and impact wellbeing of current and future generations of Australians. Decision-making under the EPBC Act must also consider intergenerational equity, such that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations (Section 3A(c)).	compatibility with Section 3A (Ecologically Sustainable Development) of the EPBC Act. Section 10 of the PD Head Document provides details on the economic and social impacts as a result of the Project.
	3.1 Economic costs and benefits have been overstated Section 10 of the PD makes spurious and completely unsubstantiated claims regarding the economic and social benefits of the SMGPC. Disingenuously, BMA makes the claim that the SMGPC will contribute to the Queensland economy through royalties, at the same time that BMA and BHP are mounting a spirited campaign against royalty payments, based on the false claim that royalties are making Central Queensland mines uneconomic.¹² The claims of economic benefits of the SMGPC do not take into account a number of factors affecting coal mine profitability in recent years including: • Rising labour costs, caused by: - o Skilled labour shortages and an aging workforce, with fewer young people entering mining engineering and other related degrees and courses.¹³ - o Enforcement in 2025 by the Fair Work Commission of equal pay rates between direct hire and labour hire employees performing the same job. As a result, BHP was ordered to pay an average annual increase of \$30,000 to some 2,200 coalminers.¹⁴ • Rising cost of diesel and other inputs • Costs of meeting obligations under the SGM and general public and shareholder pressure to reduce carbon emissions. • Longer periods of shut down due to extreme weather events, including high rainfall events, flooding and heat stress. In 2022, IEEFA calculated that in the first half of the year, floods	In FY2025, BMA paid \$1.5 billion in coal royalties to the Queensland Government. BMA has paid more coal royalties, and at a higher rate, than any other company in Queensland. Since 2022, BMA has paid over A\$14.1 billion in royalties and other payments to governments, which is almost 50% of the total royalties paid to the Queensland Government in this time. Under the current investment settings with the world's highest royalties, BHP/BMA cannot invest in further growth in Queensland but will maintain and optimise existing operations, including at SRM. The planning and application of this Project began before Queensland coal royalty rates became the highest in the world. Decisions on investment and development are completely separate to the assessment process. BMA has been a member of the Bowen Basin community for more than 54 years, and is the

Submitter Number	Submission	BMA response to submissions
	contributed to a 22% increase in operating costs.¹⁵ Both 2025 and the first two and a half months of 2026 have featured significant rainfall and flooding in the Fitzroy Basin.¹⁶ As long as global temperatures continue to rise, this trend will increase in frequency and severity. Obviously, increased operating costs does not necessarily negate the economic benefits of the SMGPC, as in fact, larger amounts of money would flow to workers and suppliers. However, it does call into question the viability of the expansion, and increase the likelihood of Saraji Mine being shut down and entering care and maintenance. In this situation, it would become a stranded asset, with devastating consequences to the local and regional workforce and suppliers. It is also implied that SMGPC is needed to maintain the current workforce levels at Saraji Mine. However no information is provided on life of mine, or production rates with and without the SMGPC, so this claim cannot be substantiated. A better outcome for workers at Saraji Mine would be for BHP to work with the Net Zero Economy Authority, Queensland Government and Isaac Regional Council to develop a regional economic transition plan for workers and local businesses. In this way, the region would be supported in economic diversification and protected from shocks as the world moves away from coal. The SMGPC will also impose a cost on Australian taxpayers directly and indirectly. These costs are not acknowledged by BHP. Direct costs include:¹⁷ • The Fuel Tax Credits Scheme, which cost taxpayers \$10.2 billion in 2024–25 • Excise concessions on aviation fuel for FIFO workers • Queensland government expenditure on construction and operation of rail and port infrastructure to support the transport and export of coal. The Australia Institute calculates that these concessions amount to \$1 billion; the vast majority (some \$946 million) relates to rail network infrastructure funding • Subsidies received over the life of the tenements for exploration costs • GST refunds.	largest private sector employer in Central Queensland (9,000 people). In FY25 alone, BMA spent more than A\$6.4 billion with suppliers (including A\$1.4 billion with more than 820 local suppliers), and over A\$100 million spent with more than 50 indigenous businesses, including more than A\$50 million with Traditional Owner businesses. BMA also supported Queensland's coal communities with over A\$9 million in social investment projects. BMA will continue to work closely with the local community throughout the mine operation.
	3.2 The cost to the economy of scope 1, 2 and 3 emissions is not counted In spite of the urgency of the climate crisis, and the significant impacts already being caused to matters of national environmental significance (MNES) and the economic wellbeing and health of Australians, the	BMA manages greenhouse gas (GHG) emissions through a combination of corporate strategy and regulatory compliance. Please refer to Attachment 1 for further detail on how

Submitter Number	Submission	BMA response to submissions
	PD does not even acknowledge greenhouse gas (GHG) emissions, let alone provide an assessment of the contribution that these emissions will make to the dangerous accretion of GHGs in the atmosphere. In 2024/25, Saraji Mine reporting scope 1 emissions of 383,551 tonnes under the National Greenhouse and Energy Reporting (NGER) regulations, while producing about 16 Mtpa run of mine (ROM) coal. This equates to GHG emissions of 24 tonnes per Mt of ROM coal. Hence, the scope 1 emissions from the SMGPC will be 1,318,456 tonnes, or 1.3 Mt. Considering scope 3 emissions, based on life of project production of 55,000 kilotonnes of coking coal, a coal type conversion factor of 28.2 TJ/kt and a CO₂ emissions factor of 94600 kg CO₂/TJ, this equates to 146,724,600,000 kg CO₂e (147 Mt) for scope 3 emissions.¹⁸ The social cost of carbon represents a monetized version of the impact of climate change on our society, and is calculated by estimating the total damages caused by each incremental tonne of CO₂e emitted. In economic terms, damage and loss associated with climate change arises from loss of land due to sea level rise, additional costs to households and businesses because of increased insurance costs or indeed, inability to obtain insurance, damage to assets from natural disasters, loss of productivity for businesses due to natural disasters, additional costs to households and businesses due to air conditioning, reduced agricultural productivity and higher rates of crop failure, damage to infrastructure, lost productivity due to damaged infrastructure, increased mortality and morbidity, to name just some of the losses.¹⁹ These impacts are already being felt by the current generation, and will be amplified across future generations, which poses a significant limitation on their wellbeing and human rights. Various methods exist for calculating the SCC, but there is growing consensus that the price is in the order of several hundred dollars per tonne.²⁰ In the table below, values determined in a range of recent review studies as well as the SCC price adopted by USEPA in 2023 (\$US190) are presented, along with the current value of the ACCU, which is a proxy for a carbon price in Australia, although it does not in any way represent the social cost of carbon. No adjustment is made for different base years.	emissions are managed and the opportunities BMA continues to explore for further reducing emissions. Metallurgical coal is a primary ingredient in the conventional blast furnace steelmaking process. Steel is one of the most widely used building materials on earth. The higher-quality metallurgical coal, which BMA mines, will continue to play an important role in steel production for decades to come. BMA assets are set to become the first Australian operations at BHP to run under renewable power arrangements for 100 per cent of their electricity needs, following the signing in August 2024 of a new power purchase agreement (PPA) for BMA's Queensland operations. BMA entered into the new seven-year PPA commencing from FY2027. It is the third power agreement signed with Queensland's publicly-owned energy generator and retailer CleanCo, which is expected to allow BMA to meet all of its forecasted electricity needs from sources such as solar, wind and pumped hydro. The agreement, when combined with another renewable PPA signed with CleanCo in 2023, is expected to allow BMA's Queensland assets to become the first of the Australian operations at BHP to have 100 per cent of their forecasted operational electricity demand supplied by renewable PPAs from 2027.

Submitter Number	Submission	BMA response to submissions																																
	Table 1 – social cost of carbon emissions from SMGPC <table><tr><th>Source and assumptions</th><th>Recommended SCC (\$US/tonne)</th><th>Scope 1 emissions – 1.3 Mt</th><th>Scope 3 emissions - 147 Mt</th></tr><tr><td>Centre for Economic Policy Research²¹ Based on TFP²² damages only – damage to aggregate production</td><td>25.5</td><td>\$US 33 M \$AU 45 M</td><td>\$US 3749 M \$AU 5,166 M</td></tr><tr><td>Centre for Economic Policy Research Based on TFP damages and recurring climate disasters</td><td>139</td><td>\$US 181 M \$AU 249 M</td><td>\$US 20,433 M \$AU 28,152 M</td></tr><tr><td>Centre for Economic Policy Research Based on TFP damages and recurring climate disasters and climate tipping points</td><td>182</td><td>\$US 237 M \$AU 326 M</td><td>\$US 26,754 M \$AU 36,861 M</td></tr><tr><td>Moore, Drupp, Rising and Wagner (2024)²³ Reviewed a wide range of carbon prices and interviewed experts about modelling assumptions</td><td>283</td><td>\$US 368 M \$AU 507 M</td><td>\$US 41601 M \$AU 57,316 M</td></tr><tr><td>US EPA (2023)²⁴ Adopted a carbon price after a wide ranging review</td><td>190</td><td>\$US 247M \$AU 340 M</td><td>\$US 27,930 M \$AU 38,477 M</td></tr><tr><td>Rennert et al (2022) Recommended a carbon price after reviewing a wide range of studies and models</td><td>185</td><td>\$US 241 M \$AU 332 M</td><td>\$US 27195 M \$AU 37,465 M</td></tr><tr><td>ACCU price – typical</td><td>\$AU35</td><td>\$AU 45.5 M</td><td>\$AU 5,145 M</td></tr></table> Obviously, the social and economic losses associated with carbon emissions are spread globally, so arguably, these costs do not fully cancel out the benefits to the Australian economy. However the impacts of climate change on Australian society and the Australian economy cannot really be carved out from global impacts. Australia is deeply embedded in global trade networks and supply chains, and disruption to these will have large implications for Australians, including upward pressure on the cost of living (particularly through food scarcity, insurance costs and global transport disruptions, all of which are	Source and assumptions	Recommended SCC (\$US/tonne)	Scope 1 emissions – 1.3 Mt	Scope 3 emissions - 147 Mt	Centre for Economic Policy Research ²¹ Based on TFP ²² damages only – damage to aggregate production	25.5	\$US 33 M \$AU 45 M	\$US 3749 M \$AU 5,166 M	Centre for Economic Policy Research Based on TFP damages and recurring climate disasters	139	\$US 181 M \$AU 249 M	\$US 20,433 M \$AU 28,152 M	Centre for Economic Policy Research Based on TFP damages and recurring climate disasters and climate tipping points	182	\$US 237 M \$AU 326 M	\$US 26,754 M \$AU 36,861 M	Moore, Drupp, Rising and Wagner (2024) ²³ Reviewed a wide range of carbon prices and interviewed experts about modelling assumptions	283	\$US 368 M \$AU 507 M	\$US 41601 M \$AU 57,316 M	US EPA (2023) ²⁴ Adopted a carbon price after a wide ranging review	190	\$US 247M \$AU 340 M	\$US 27,930 M \$AU 38,477 M	Rennert et al (2022) Recommended a carbon price after reviewing a wide range of studies and models	185	\$US 241 M \$AU 332 M	\$US 27195 M \$AU 37,465 M	ACCU price – typical	\$AU35	\$AU 45.5 M	\$AU 5,145 M	The most recent PPA supports four renewable electricity projects across regional Queensland which have generated more than 1500 local jobs during construction and are expected to create 37 jobs once operating. Further, Section 9 (Table 9-1) of the PD demonstrates the Project Compatibility with Section 3A (Ecologically Sustainable Development) of the EPBC Act. Section 10 of the PD provides details on the economic and social impacts as a result of the Project.
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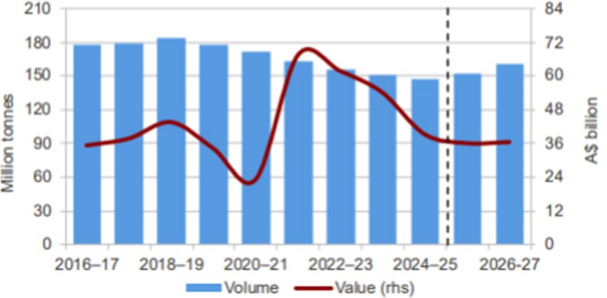
Submitter Number	Submission	BMA response to submissions
	exacerbated by climate change). Climate change is also causing humanitarian crises and destabilising ever larger regions around the world, which require Australian to respond. The impacts of climate change will be even more intense for future generations, something that BMA fails to address in its assessment of the compatibility of the SMGPC with Section 3A of the EPBC Act. Approval of the SMGPC will clearly have a negative impact on economic and social wellbeing, including imposing severe limitations on human rights of current and future generations.	
	3.3 Anthropogenic climate change is already harming Australians and Queenslanders The relationship between GHG emissions and climate change in Australia was recognised in the 2021 State of the Environment Report, which stated that:²⁵ “Warming of the Australian climate, and associated changes in the climate system, are driven by increased concentrations of greenhouse gases in the atmosphere. Changes to the climate are inevitable, based on greenhouse gases that have already been emitted, but further changes in the second half of the 21st century will depend on the level of future global emissions.” The implications for Queenslanders are also recognised in State's the 2024 State of the Environment report:²⁶ “Climate change is one of the most pressing challenges of our time, influencing weather patterns, ecosystems, and the natural processes that sustain life. It drives shifts in temperature, sea levels, and extreme weather events, disrupting environmental stability and resilience. Queensland's climate is changing due to global warming. As the climate continues to shift throughout this century, its impacts on Queenslanders and the environment are expected to become increasingly pronounced.” In the past three years global annual surface air temperatures have been at or very close to 1.5oC above the pre-industrial baseline (1.47oC in 2025, 1.60 in 2024, and 1.48 in 2023).²⁷ In Australia, the national average temperature was 1.23oC above the 1961-1990 average in 2025, making it the fourth hottest year since records began in 1910.²⁸ The accretion of GHGs in the atmosphere as a result of human activities has already caused changes in the climate system with tangible impacts. In Queensland, these include:²⁹	BMA manages GHG emissions through a combination of corporate strategy and regulatory compliance. Please refer to Attachment 1 for further detail on how emissions are managed and the opportunities BMA continues to explore for further reducing emissions. From 1 July 2026, BMA assets are set to become the first Australian operations at BHP to run under renewable power arrangements for 100 per cent of their electricity needs, following the signing in August 2024 of a new PPA for BMA's Queensland operations. BMA entered into the new seven-year PPA commencing from FY2027. It is the third power agreement signed with Queensland's publicly-owned energy generator and retailer CleanCo, which is expected to allow BMA to meet all of its forecasted electricity needs from sources such as solar, wind and pumped hydro. The agreement, when combined with another renewable PPA signed with CleanCo in 2023, is expected to allow BMA's Queensland

Submitter Number	Submission	BMA response to submissions
	- exacerbation of heatwaves; - long-term increase in extreme fire weather and length of the fire season; - changes in rainfall patterns resulting in severe flooding events; - mass bleaching of the Great Barrier Reef; and - worsening drought conditions. Each of these impacts has immediate effects on the health and wellbeing of Queenslanders, as well as undermining economic productivity and destroying or damaging natural resources that current and future generations will rely on. Impacts of climate change on Queenslanders have been well documented by the Climate Council and are becoming even more immediate.³⁰ A small number of recent examples of impacts of climate change on the health and economic wellbeing of Queenslanders are provided here. The links between which anthropogenic climate change and increased frequency and intensity of flood events is well known. Higher levels of evaporation, including from warmer oceans, means more water vapour enters the atmosphere. A warmer atmosphere contains more water vapour, with an estimate increase of 7% of water vapour per 1oC increase. This explains the higher volumes of rainfall as global temperatures rise. Considering heavy rain and flooding, in the first two and half months of 2026, Queensland has been hit with successive heavy rainfall events, causing flash flooding and flooding, isolating communities and destroying private property, agricultural resources and public infrastructure. To the end of February 2026, the Federal and State governments have provided \$66 million in disaster recovery grants for small businesses, support for primary producers, emergency repairs and community support. The Cairns Post reported on 25 Feb 2026 that at least 100,000 cattle had died and over 4,000km of roads and 3,000 km of fences destroyed in north Queensland.³¹ For some farmers, the current floods are the third since 2019, with similar or greater scales of impact for each of these floods. Consulting firm Deloitte estimated that the 2022 significant rainfall and flooding event in South East Queensland caused a total cost of \$7.7 billion to Queensland, including:	assets to become the first of the Australian operations at BHP to have 100 per cent of their forecasted operational electricity demand supplied by renewable PPAs from 2027. The most recent PPA supports four renewable electricity projects across regional Queensland.

Submitter Number	Submission	BMA response to submissions
	- insured and uninsured property losses of about \$2 billion - Around \$492 million in damage to public infrastructure - Lost economic activity (for small businesses only) of \$324 million - Agricultural production losses of \$254 million - Emergency response and clean up costs of \$65 million - Monetised cost of fatalities of \$84 million - Health, social and community impacts of around \$4.4 billion, with about 500,000 people affected.³² The Insurance Council of Australia recorded 8,328 insurance claims, including 7754 for residential dwellings, after Cyclone Alfred in early 2025.³³ Tropical Cyclone Jasper (2023), cost \$409 million from around 10,500 claims. Overall, extreme weather events cost almost \$3.5 billion in insured losses from 264,000 claims in 2025.³⁴ Many more losses would have occurred that are not covered by insurance. ³⁵ The increased frequency and severity of natural disasters means that insurance costs are rising, hitting households and small businesses where it hurts. Insurance costs for Australians have gone up by \$30 billion in 10 years.³⁶ Between 2022 and 2023, the average home insurance premium in Australia rose by 14%.³⁷ In 2024, the Actuaries Institute found that 24% of Queensland households were struggling or unable to afford insurance, and that the average annual home insurance premiums in Queensland were \$3,815.³⁸ Insurance companies are also increasingly refusing insurance due to heightened risk from climate change. The Climate Council estimates that by 2030, 6.5% of properties in Queensland will be effectively uninsurable.³⁹ Climate change is also causing significant increases in health risks for Queenslanders. The soil-borne bacterial disease melioidosis becomes more prevalent after heavy rains in tropical areas. In 2025, 37 people died of melioidosis from a total of 258 infections in north Queensland, with most of the deaths and infections in the early part of the year after extensive flooding. To date in 2026, 73 people	

Submitter Number	Submission	BMA response to submissions
	were diagnosed with melioidosis in Queensland, with seven deaths so far this year. In the five years 2020-2024 inclusive, the average infection rate was only 85 cases per year.⁴⁰ Other serious health conditions that are becoming more prevalent in Queensland include dengue fever, with climate change extending the habitat for the mosquito <i>Aedes aegypti</i>, and leptospirosis which is associated with increased moisture and humidity.⁴¹ As well as being potentially fatal, all three diseases cause acute infections lasting over a week, and leave those infected with fatigue and other after-effects that may take months to recover from. This is of course extremely unpleasant for those infected but also has broader ramifications in terms of public health, community support resources, and economic productivity. Warmer global temperatures also increase the frequency and severity of heatwaves. Heatwaves are estimated to cause a 5% increase in deaths and a 12% increase in ambulance call outs.⁴² While this is obviously devastating for those individuals and their families and communities, increased severity and frequency of heat waves across Queensland also places strain on health and emergency services. Overall, on current trajectories, the impacts of the changes in the climate system will have significant implications for economic activity. A University of Melbourne economic think tank has conservatively estimated damage and loss in Australia from climate change as \$584.5 billion in 2030, with \$171 billion of this in Queensland.⁴³ This is a conservative estimate, covering reduced agricultural and labour productivity (for example when people cannot get to work because of floods, or can't work outside because of heatwaves), health impacts, loss of land due to sea level rise and impacts on buildings and infrastructure. Although impacts being felt in the current time are already very severe, continuing to allow accretion of greenhouse gases in the atmosphere imposes an intolerable burden on future generations. The Federal Court in <i>Sharma v Minister for the Environment</i> accepted evidence put forward in respect of the future impacts of climate change and found:⁴⁴ “It is difficult to characterise in a single phrase the devastation that the plausible evidence presented in this proceeding forecasts for the Children ... The physical environment will be harsher, far more extreme and devastatingly brutal when angry. As for the human experience – quality of life, opportunities to partake in nature's treasures, the capacity to grow and prosper – all will be greatly diminished. Lives will be cut short. Trauma will be far more common and good health harder to hold and maintain. None of this will be the fault of nature itself. It will largely be	

Submitter Number	Submission	BMA response to submissions
	inflicted by the inaction of this generation of adults, in what might fairly be described as the greatest inter-generational injustice ever inflicted by one generation of humans upon the next.” The economic benefit of any development is also vulnerable to climate change impacts itself, including the risk that it may not be able to operate at optimal levels for its full expected lifespan due to factors including increased frequency of extreme weather events and changes to water availability as a result of prolonged droughts. In both 2025 and 2026, coal mines in central Queensland were shut down for days or weeks due to extreme wet weather. Importantly, the impacts of climate change are being felt far beyond Queensland.⁴⁵ The SMGPC exposes the entire population of the planet to exacerbation of global warming and climate change related risks, to benefit a small number of BHP and Mitsubishi shareholders.	
	3.4 There is no justification for expanding metallurgical coal mines BHP’s justification for SMGPC revolves around the somewhat convoluted claim that “the Project will make a considerable positive economic impact in terms of the ongoing challenge involved in delivering supplies to meet growing world demand for metallurgical coal” (page 158). BHP uses metallurgical coal forecast demand data from Wood Mackenzie reports, which are only available to the general public at a cost of around \$US10,000, to support its claims of ongoing demand for coal produced at SMGPC. The Wood Mackenzie report used to justify SMGPC is from 2021, and claims that growth in demand from India will require Australian coal. More readily available and up-to-date data comes from the Australian Government’s Energy and Resources quarterly. The most recent version, December 2025, shows a steady decline in actual metallurgical coal exports from a peak of 180 Mt in 2018 to under 150 Mt in 2025, a decrease in nearly 20%, as shown in the excerpt below.⁴⁶ While export tonnages are forecast to rise again, it is worth noting that Department of Industry, Science and Resources has forecast increases in export tonnage every quarter, only to find that export continues to fall away.⁴⁷	Section 9 (Table 9-1) of the PD Head Document demonstrates the Project Compatibility with Section 3A (Ecologically Sustainable Development) of the EPBC Act. Section 10 of the PD Head Document provides details on the economic and social impacts as a result of the Project. It is widely recognised across the industry that rising seaborne metallurgical coal demand from India and Southeast Asia will more than offset structural declines in mature importing regions, supporting global demand growth through to 2050. Steelmaking coal is a primary ingredient in the conventional blast furnace steelmaking process. Steel is one of the most widely used building materials on earth. The higher-quality coal BMA mines will continue to play an important role in steel production for decades to come. Metallurgical coal demand from

Submitter Number	Submission	BMA response to submissions
	Australian metallurgical coal exports  BHP's justification centres on growing demand for metallurgical coal fuelled by the need for steel to build renewable energy components and improved trade relations with China. But in fact, global energy sector restructuring is already underway in response to decarbonisation needs, with China leading the way, particularly in decarbonised steel production.⁴⁸ It is apparent from its CTAP that BHP has significantly underestimated global progress towards decarbonisation of the steel industry.⁴⁹ Further, the Wood Mackenzie 2021 forecast of increased demand from India has not come to fruition, and indeed exports to India have been falling and not rising. Analysis by the Institute for Energy Economics and Financial Analysis (IEEFA) is that the Indian government is seeking to reduce reliance on imported coal, instead expanding domestic production and diversifying into decarbonised steel making.⁵⁰ In September 2025, the Treasury produced its analysis of the economic costs and opportunities associated with its net zero carbon emission policy. With no action from Australia, ie a 'disorderly transition' scenario, coal output is forecast to decline by 42% by 2035 and 71% by 2050. Of course, if Australia chooses to be proactive and take advantage of the economic opportunities arising from global decarbonisation, this decline will occur more rapidly. Research group Climate Resource analysed the projected impact of global climate action on demand for Australian coal exports for the Australian Government under several demand and warming scenarios and, as shown in the excerpt below, predicted declines for all scenarios.⁵¹	South East Asia and India is expected to increase for decades to come.

Submitter Number	Submission	BMA response to submissions																																																																																											
	<i>Table S-1: Change in Australia's thermal and metallurgical coal exports (median projection) relative to 2024, derived from NGFS5 scenarios evaluated at peak warming of 1.6°C and 1.8°C</i> <table><tr><th>Case</th><th>Product</th><th>2030</th><th>2035</th><th>2040</th><th>2045</th><th>2050</th></tr><tr><td colspan="7">Low Demand Case - 1.6°C</td></tr><tr><td></td><td>Thermal</td><td>-81%</td><td>-98%</td><td>-99%</td><td>-100%</td><td>-100%</td></tr><tr><td></td><td>Metallurgical</td><td>-56%</td><td>-80%</td><td>-90%</td><td>-93%</td><td>-96%</td></tr><tr><td colspan="7">Low Demand Case - 1.8°C</td></tr><tr><td></td><td>Thermal</td><td>-63%</td><td>-78%</td><td>-89%</td><td>-95%</td><td>-96%</td></tr><tr><td></td><td>Metallurgical</td><td>-33%</td><td>-54%</td><td>-72%</td><td>-82%</td><td>-87%</td></tr><tr><td colspan="7">High Demand Case - 1.6°C</td></tr><tr><td></td><td>Thermal</td><td>-72%</td><td>-96%</td><td>-99%</td><td>-100%</td><td>-100%</td></tr><tr><td></td><td>Metallurgical</td><td>-38%</td><td>-69%</td><td>-86%</td><td>-90%</td><td>-93%</td></tr><tr><td colspan="7">High Demand Case - 1.8°C</td></tr><tr><td></td><td>Thermal</td><td>-44%</td><td>-64%</td><td>-81%</td><td>-90%</td><td>-94%</td></tr><tr><td></td><td>Metallurgical</td><td>-5%</td><td>-28%</td><td>-49%</td><td>-61%</td><td>-71%</td></tr></table> While it is clear that some demand for metallurgical coal will remain over the predicted life of Saraji Mine, there is clearly no need to allow an extension of any existing mines as Australia already has more than enough operating coal mines to meet all of the likely demand according to analysis by IEEFA and the International Energy Agency (IEA).⁵² These forecasts significantly undermine the justification for SMGCP. Given these forecasts for metallurgical coal, it is much more likely that Saraji Mine and the SMGCP will become stranded assets, leaving local communities, businesses and suppliers in the lurch.	Case	Product	2030	2035	2040	2045	2050	Low Demand Case - 1.6°C								Thermal	-81%	-98%	-99%	-100%	-100%		Metallurgical	-56%	-80%	-90%	-93%	-96%	Low Demand Case - 1.8°C								Thermal	-63%	-78%	-89%	-95%	-96%		Metallurgical	-33%	-54%	-72%	-82%	-87%	High Demand Case - 1.6°C								Thermal	-72%	-96%	-99%	-100%	-100%		Metallurgical	-38%	-69%	-86%	-90%	-93%	High Demand Case - 1.8°C								Thermal	-44%	-64%	-81%	-90%	-94%		Metallurgical	-5%	-28%	-49%	-61%	-71%	
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	3.5 An integrated decision must acknowledge negative economic impacts on Australians A thorough cost benefit analysis for the SMGPC is required before a properly integrated decision in accordance with Section 3A of the EPBC Act can be made. Such an analysis would show negative economic impacts, as, when matters such as taxpayer contributions to coal mine operation, and the economic and health burdens of climate change are considered, ordinary Australians will be much worse off. It is inequitable that BHP shareholders should be able to benefit from a project that imposes such a burden on Australian society.	Section 9 (Table 9-1) of the PD Head Document demonstrates the Project Compatibility with Section 3A (Ecologically Sustainable Development) of the EPBC Act. Section 10 of the PD Head Document provides details on the economic and social impacts as a result of the Project.																																																																																											

Submitter Number	Submission	BMA response to submissions
	A much better outcome for the local and regional economy would be a staged withdrawal from the Saraji Mine, and financial support from BHP to a regional economic transition plan for the region.	
	IN SUMMARY The scientific consensus is clear that expansion of fossil fuel production must be stopped in order to reduce global GHG emissions and avoid the potentially catastrophic impacts of unmitigated global warming and climate change.⁵³ Climate change is already having significant and irreversible impacts on MNES including ecological communities, threatened and migratory species and the Great Barrier Reef. It is inconsistent with the principle of biodiversity conservation to allow any expansion of a coal mine to go ahead. The SMGCP will have direct and indirect impacts on biodiversity, including loss of habitat for endangered and vulnerable species and loss of connectivity. The proponent has not provided adequate information to support its claims that the SMGCP will not have adverse effects on water quality and associated aquatic and groundwater-dependent ecosystems including along Phillips Creek which provides an important movement corridor for endangered species koala and greater glider. In particular, the proponent has not demonstrated that current impacts from Saraji Mine are acceptable, or that the Saraji Mine water management system can cope with inputs from both the SMGCP and the proposed SEMLP. This is completely unacceptable at a time when climate change is already placing pressure on our water resources and security of food and water supply. The SMGCP is an unnecessary project that will be a drain on the Australian economy and will impact on the health and wellbeing of future generations in a way that is inconsistent with Section 3A of the EPBC Act. Thank you for considering this submission.	Noted. Please refer to the previous rows for BMAs responses, and also Attachment 1 for further information and detail on BMA emissions management.
3	Thank you for the opportunity to make this submission in response to the invitation to make comment on the draft preliminary documentation for the Saraji Mine Grevillea Pit Continuation Project (the Project) proposed by BMA Alliance Coal Operations Pty Ltd (the Proponent) under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act).	Noted. Please refer to the following rows for BMAs response to the comments made.

Submitter Number	Submission	BMA response to submissions
	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. The proposed action The proposed Project is an extension to the Saraji Mine - Grevillea Pit coal mining operations. The proposed Project is located approximately 20km north of Dysart in the Bowen Basin within the Isaac Regional Council area. The intent is to access available resources located within MDL 700021 immediately east of ML1782 which is currently being mined. The Saraji Mine has been in operation since 1974, producing approximately 16Mtpa of Run-of-Mine (ROM) coal. It is expected that the existing resources within the Grevillea Pit will be exhausted during the 2025 financial year. This Project would extend the footprint of the mine by approximately 220ha and extend the life of the mine until 2055. If approved, the mine extension would prolong the life of the Saraji mine for another 30 years. There is no information about coal extraction rates over the 30 years or any information on estimated greenhouse gas emissions or any mitigation measures.	

Submitter Number	Submission	BMA response to submissions
	The Project was referred to the Department of Climate Change, Energy, the Environment and Water (DCCEEW) in December 2023 for assessment under the EPBC Act. The delegate of the Minister for the Environment determined on 4 June 2024 that the Project was a Controlled Action with the following controlling provisions: - Listed threatened species and communities (section 18 and section 18A); and - A water resource, in relation to coal seam gas development and large coal mining development (section 24D and section 24E). The Minister's delegate determined the proposed action will be assessed by Preliminary Documentation. ENVA'S SUBMISSION EnvA submits that the Project is likely to have clearly unacceptable impacts on matters protected under the EPBC Act, particularly threatened species and ecological communities, water resources, and climate-related impacts on MNES. EnvA therefore recommends that the Project be refused. Further recommendations are provided in our grounds for submission below.	
	GROUND'S FOR SUBMISSION Significant impact on threatened species and communities The Project would, or is likely to, impact numerous threatened species and communities listed under the EPBC Act, with DCCEEW requiring further assessment of seven threatened species and communities. The Preliminary documentation confirms that the project will impact on the habitat of: - Brigalow (Acacia harpophylla dominant and co-dominant) (Endangered) - Poplar box Grassy Woodland on Alluvial Plains (Endangered) - King blue-grass (Dichanthium queenslandicum) (Endangered) - Bluegrass (Dichanthium setosum) (Vulnerable) - Squatter pigeon (southern) (Geophaps scripta scripta) (Vulnerable) - Ornamental snake (Denisonia maculata) (Vulnerable)	Noted. Please refer to Section 3.3 of the PD Head Document for impact assessments (including significant impact assessments) completed for Greater glider, Koala, Squatter Pigeon, and Ornamental snake. Ornamental snake is the only species identified to be significantly impacted by the Project. Offsets are proposed to compensate for significant impacts to 45.56ha of Ornamental snake habitat. As outlined within the PD impacts to Brigalow Threatened Ecological Community (TEC), Poplar Box TEC, King Blue-grass, and Bluegrass are unlikely due to absence of habitat from within and proximal to the Project area. Please refer to Sections 3.2.6.1 and

Submitter Number	Submission	BMA response to submissions
	• Koala (<i>Phascolarctos cinereus</i>) (Endangered) • Greater glider (<i>Petauroides volans</i>) (Endangered) The Proponent considers that the only significant impact will be on 132.32 ha of ornamental snake habitat. EnvA submits that this project will also impact the habitat of all the other species and communities listed above. By way of examples: • The project will clear 150.45 ha of Brigalow vegetation. The Proponent considers that the Brigalow regrowth and the small patch size of the remnant Brigalow does not meet the key diagnostic criteria for determination as Brigalow Threatened Ecological Community (TEC). It must be noted the Project is situated within the Isaac-Comet Downs subregion where over 78.8% of vegetation cover has already been cleared.² EnvA considers that even regrowth and small patches of endangered TECs are important in the long-term recovery of the endangered TEC. • The project will clear over 11 ha of the endangered poplar box woodland TEC (Figure 3-2). While the Proponent acknowledges the impact to this vegetation community, and notes that it provides an abundance of koala food trees and potential greater glider habitat, however this is not considered further in the assessment of impacts to MNES. • The Proponent also considers that the loss of 11.29 ha of koala habitat and the indirect impacts on the koala and greater glider through the reduction in the width of the corridor and disturbance of the preferred habitat for these species along Phillips Creek (Figure 3-5). EnvA considers that the clearing of habitat for all the above-listed threatened species and communities constitutes a significant impact that is exacerbated by cumulative habitat loss across the region.	3.2.6.6 of the PD Head Document and Sections 3.2, 3.3.2 and 4.1.1 and Appendix C of the TESIA (Appendix D of the PD) for detailed technical assessments. BMA note that Poplar Box TEC is not present within the Project area, nor is Brigalow TEC. No regional ecosystems that correspond with the Poplar Box TEC were identified within the Project area and ground-truthing did not confirm presence of Brigalow TEC. While features (e.g., individual species) of the relevant TECs may be mapped, ecological investigation confirmed that the communities present do not meet the DCCEEW criteria for TEC. Detailed assessments are provided in the abovementioned sections of the PD and technical reports. No reduction to the riparian corridor associated with Phillips Creek is proposed as part of the Project. An established fence along the Project area boundary between the Project and Phillips Creek separates the two areas and indicates where a change in vegetation composition occurs due to areas being subject to different management regimes, as detailed in Sections 3.2, 3.4 and 3.6 of the TESIA (Appendix D of the PD). The potential for indirect impacts from the Project to the Phillips Creek riparian corridor and hence to Koala and Greater glider is considered unlikely however will be subject to ongoing monitoring as part of the Project. Please refer to Section

Submitter Number	Submission	BMA response to submissions
		5.1.5.1 of the PD Head Document for details on Koala and Greater glider monitoring.
	Proposed offset management plan An offset strategy has been developed for the Project to mitigate a net loss to ornamental snake habitat.³ As noted above, EnvA believes that, if approved, the Project will also impact on other threatened species and communities which should also be considered for offset requirements. The proposed offset area for the ornamental snake is a 356 ha section of Croydon Station, located approximately 65 km east of the Project Site. The offset area does not provide any addition habitat, but seeks to: - to protect and improve ornamental snake habitat within the Offset Area to a level at which provides greater conservation value than its current form and provides at least the same conservation value as the current impact site. - manage and reduce threats to the ornamental snake within available habitat, and - improve the condition and extent of regrowth vegetation providing / increasing connectivity values. In addition to this, EnvA notes that the proposed offset area does not replace the habitat that will be destroyed by this project. The offset area management plan only proposes to marginally improve the habitat quality of an already vegetated area where ornamental snakes already occur and at a considerable distance from the project area. EnvA further considers that the proposed offset fails to meet the requirements of the EPBC Act Environmental Offsets Policy.⁴ Specifically: - Suitable offsets must deliver an overall conservation outcome that improves or maintains the viability of the protected matter. Offsets must deliver an outcome that improves or maintains the viability of the protected matter relative to a “do nothing” scenario. In this case, the offset area already supports the listed species, and no evidence is presented to demonstrate that it can sustain higher population densities or expanded ecological functions. This means the offset does not create new habitat or improve long-term viability; rather, it preserves what already exists. Therefore, it fails to provide an additional conservation outcome.	Please refer to Sections 3 and 4 of the PD Head Document for the relevant MNES significant impact assessments. Also refer to BMAs response in the previous comment row clarifying which threatened species and ecological communities. Please see the following responses to the corresponding points: - The offset area and ongoing management measures to compensate the proposed impacts to MNES have been selected to meet the Offset Policy, OAG (the offsets calculator) and requirements from DCCEEW. Demonstration of alignment with the Offset Policy includes, but is not limited to, Section 2.4 <i>Compliance with the offset policy</i>, Section 4.2 <i>Management Objectives</i>, and Appendices A and C. - The OMP states that a Voluntary Declaration under the <i>Vegetation Management Act 1999</i> (Qld) and a covenant under the <i>Land Act 1994</i> (Qld) will be pursued to secure the offset site (refer Section 4.2.2 of the OMP – Appendix I of the PD). These legal mechanisms align with the Offsets Policy. - Noted. The offset area has been selected to meet the Offsets Policy and OAG, as

Submitter Number	Submission	BMA response to submissions
	2. Tenure for direct offsets to constitute a legitimate offset, requires that the site must be legally secured in a way that ensures long-term protection and management. As identified in the Offset Area Management Plan, the proposed offset area is to be secured through a Voluntary Declaration under the Vegetation Management Act 1999 (VM Act). The use of a Voluntary Declaration under the VM Act—while legally recognised—is insufficient for enduring protection. The declaration is dependent on the landholder’s agreement and only remains in place until the objectives of the OAMP are achieved, the declaration ends, or when the authorised activities have ended (s19 of the VM Act). 3. Suitable offsets must be of a size and scale proportionate to the residual impacts on the protected matter. While improved management of threatened species habitat is positive, the proposed offset and lack of connectivity with the Project’s disturbance footprint will lead to the loss of the ornamental snakes from the project area. 4. Suitable offsets must be additional to what is already required, determined by law or planning regulations, or agreed to under other schemes of programs. EnvA considers that the proposed offset area already has a level of protection under the VM Act and the revised EPBC Act. The VM Act regulates the clearing of vegetation in a way that conserves remnant vegetation, prevents loss of biodiversity and maintains ecological function. Likewise, the EPBC Act amendments now require approvals for: • Clearing of vegetation that has not been cleared for at least 15 years, and • Clearing of vegetation from land within 50m of a watercourse, wetland or drainage line within the Great Barrier Reef Catchment area.⁵ EnvA also notes broader concerns regarding the effectiveness of biodiversity offsets in Australia. Even the previous Federal Environment Minister has acknowledged that “We know the current offset arrangements are broken and making nature worse.⁶ This reinforces the need for strict application of the EPBC Act Environmental Offsets Policy and a precautionary approach to habitat loss. For this project, the Proponent has only proposed to offset the loss of ornamental snake habitat and has disregarded the impact to other threatened species and communities. We again reiterate that the Project will also impact on other threatened species and communities which should also be considered for offset requirements.	detailed within the OMP (see Sections 2 and 3 of the OMP). 4. The offset area has been selected to meet the Offsets Policy, OAG, and EPBC Act in force at time of the referral of the proposed action. Please refer to Section 4.2 <i>Management Objectives</i> within the OMP for detail on the additionality the offset area provides, and how this is in accordance with the Offsets Policy. Also refer to Section 2.4 <i>Compliance with the offsets policy</i>, and Appendix A – <i>Offset Assessment Guide Output</i> within the OMP for further demonstration of compliance with the Offsets Policy, OAG and in force EPBC Act.

Submitter Number	Submission	BMA response to submissions
	It is essential that the avoidance of impact - not offsetting - remains the priority. Offsets should only ever be used as a last resort. The Project will result in the loss and fragmentation of habitat for multiple endangered and vulnerable species within an already heavily cleared bioregion. The proposed offset fails to meet key EPBC Act Environmental Offsets Policy tests, including additionality, enduring protection, and delivery of a genuine conservation gain. Given the cumulative ecological losses, the limited effectiveness of offsets in highly cleared landscapes, and the availability of alternatives that avoid further habitat destruction, EnvA considers the impacts of this Project are unacceptable. EnvA therefore recommends that the Project be refused.	
	Significant Impact on Water Resources <u>Surface water</u> The Proponent has identified the potential to impact surface water resources through the diversion of drainage features, creation of new temporary and permanent landforms with potential to affect flood waters and through release of water to the surrounding environment. Specifically, the Proponent has identified “potential” impacts to: • The Phillips Creek alluvium, which the Project will reduce the drainage systems and potentially alter creek geomorphology and flow characteristics, and • Impact on the surface water yield of 221ha of the catchment areas of One Mile, Southern, Phillips and Boomerang creeks and the Isaac River. The Proponent also claims that surface water quality impacts will be limited as mine affected waters will be contained within the existing water management system. However, the Proponent also notes that the existing water management system may spill in extreme rainfall events. Just in the last wet season, there were at least five mine affected water (MAW) releases from the Saraji Coal mine as summarised in Table 1. Table 1. Coal mine water releases from the Saraji Coal Mine (January – March 2026)	Studies completed for the Project assessed surface water impacts of the Project and determined them to be negligible on existing surface water resources, flooding and environmental values (see Section 8 of the Surface Water Assessment Report – Appendix E of the PD). A range of mitigation and management measures have been proposed and are to be implemented for the Project (presented in Section 9 of the Surface Water Assessment Report – Appendix E of the PD). REMPs and FRREMPs provide ongoing environmental monitoring at a catchment scale, establishing and building on environmental trends. Section 4.2.2.4 <i>Water Quality</i> of the PD Head Document details the current (i.e., without the Project) water quality results. Future FRREMP reporting will capture water quality results including from the Project. Refer to Sections 4.2.2.4 and 5.2 of the PD Head Document for details on the

Submitter Number	Submission	BMA response to submissions																																				
	<table><tr><th>Release dates</th><th>Receiving water</th><th>Release volume (L/s)</th><th>Receiving water flow (L/s)</th><th>Release salinity (µS)</th><th>Receiving salinity (µS)</th></tr><tr><td>13/01/2026 -17/01/2026</td><td>One Mile Creek</td><td>250</td><td>4890</td><td>225</td><td>473</td></tr><tr><td>17/01/2026 - 6/02/2026</td><td>Phillips Creek</td><td>400</td><td>4870</td><td>2018</td><td>546</td></tr><tr><td>23/01/2026 - 6/02/2026</td><td>Hughes Creek</td><td>100</td><td>2070</td><td>1298</td><td>747</td></tr><tr><td>20/02/2026 - 14/03/2026</td><td>Hughes Creek</td><td>600</td><td>1990</td><td>1707</td><td>940</td></tr><tr><td>20/02/2026 - 14/03/2026</td><td>Phillips Creek</td><td>100</td><td>3450</td><td>3748</td><td>983</td></tr></table> When calculated, this equates to the release of over 2,000 megalitres of polluted water into the local waterways – or over 860 Olympic-sized swimming pools. In most cases the salinity of the releasing water was significantly higher than the receiving water. EnvA notes that the water releases after 17 January 2026 were not compliant with their Environmental Authority conditions and were undertaken under Temporary emission licences issued by the Queensland government.⁷ The repeated reliance on Temporary Emission Licences demonstrates that exceedances and emergency releases are not isolated or exceptional events but are becoming an increasingly routine feature of coal mine water management during major rainfall events. As the climate change induced severe weather events become more frequent, EnvA considers that these heavy rainfall events are likely to become more frequent and mine water releases into the Great Barrier Reef catchment will also become more frequent. Additionally, the Proponent notes that turbidity, dissolved oxygen, suspended solids, iron and magnesium consistently already exceed the water quality objectives under the Environmental Protection (Water and Wetland Biodiversity) Policy 2019. EnvA considers that any additions of MAW pollution presents a significant impact to water quality in the largest catchment flowing to the Great Barrier Reef. We reject the Proponent’s assertion that “the Project will not result in a significant impact on surface water resources”. <u>Groundwater</u>	Release dates	Receiving water	Release volume (L/s)	Receiving water flow (L/s)	Release salinity (µS)	Receiving salinity (µS)	13/01/2026 -17/01/2026	One Mile Creek	250	4890	225	473	17/01/2026 - 6/02/2026	Phillips Creek	400	4870	2018	546	23/01/2026 - 6/02/2026	Hughes Creek	100	2070	1298	747	20/02/2026 - 14/03/2026	Hughes Creek	600	1990	1707	940	20/02/2026 - 14/03/2026	Phillips Creek	100	3450	3748	983	FRREMP and how it will continue to be implemented to monitor and assess any adverse impacts to surface water values, and ensure water management measures are effective. To clarify, iron and manganese occur naturally in elevated concentrations at most sampling locations associated with SRM. The water quality data shows that there is no clear trend between upstream and downstream water quality, indicating no material impact by the current mining operations. Refer to Sections 2.4 and 3.3 of the Surface Water Assessment Report – Appendix E of the PD for further detailed information and assessment. It is noted that TELs were required to manage water at SRM during early 2026. This was following significant rainfall events and managed with the Regulator, DETSI. Any other mine affected water releases are managed in accordance with the SRM EA, as detailed within Section 7.4.2 of the Surface Water Assessment Report (Appendix E of the PD) and <i>Schedule F: Water</i> of the SRM EA (Appendix C of the PD). Regarding groundwater impacts, Section 4.5.3 of the Groundwater Impact Assessment Report (Appendix F of the PD) presents the predicted cumulative drawdown modelled for the Project. It is summarised that the vast majority of predicted cumulative drawdowns are not related to the Project, and instead result from existing authorised mining
Release dates	Receiving water	Release volume (L/s)	Receiving water flow (L/s)	Release salinity (µS)	Receiving salinity (µS)																																	
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Submitter Number	Submission	BMA response to submissions
	The Proponent notes that the Project has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent hydro-stratigraphic units due to changes in hydraulic gradients. Potential impacts to groundwater resources may include: - Reduction in groundwaters and availability for use including ecological, stock watering, and mine water extraction. - Long term impacts associated with ongoing final void pit water evaporation. - Blending and water deterioration due to evaporation from the final proposed action void. The Proponent argues that the current groundwater already has high salinity levels and any additional impacts from dewatering and the final void will be negligible. The Proponent also notes that the predicted cumulative drawdown impacts are not directly related to the project but result from existing coal mining activities. EnvA submits that this Project will add to the cumulative impacts on groundwater in the catchment and that the impacts on ground water from the proposed residual void must be considered as significant.	activities represented in the modelling. This conclusion is made following multiple groundwater model runs (refer to Appendix A within Appendix F of the PD for the methodology) which was subject to Independent Peer Review (refer to Appendix G of the PD for review outcomes), and has been interrogated by the Independent Expert Scientific Committee (IESC) (refer Section 3, and all, of Appendix K for the specific response to the IESC Advice).
	Significant impact of Greenhouse Gas (GHG) emissions on MNES The proposed Project would extend the life of the mine from 2025 until 2055 which will result in a further 30 years of additional greenhouse gas emissions. The GHG emissions, both annually and over the life of the mine from the Project are estimated to be significant, although the preliminary documentation does not provide a meaningful assessment of the Project's estimated Scope 1, Scope 2, or downstream Scope 3 greenhouse gas emissions, nor any detailed mitigation pathway consistent with Australia's emissions reduction commitments. Climate change is already recognised as a key threatening process for many MNES, including the Great Barrier Reef, koalas, and threatened ecological communities identified within the Project area. The Project's direct and indirect greenhouse gas emissions would contribute to these cumulative impacts. The Project will emit GHGs which cumulatively will increase global temperature and result in adverse impacts to 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	BMA manages GHG emissions through a combination of corporate strategy and regulatory compliance. Please refer to Attachment 1 for further detail on SRM GHG emissions, how emissions are and will continue to be managed, and the opportunities BMA continues to explore to further reduce emissions.

Submitter Number	Submission	BMA response to submissions
	severity of coral bleaching, storms, heat waves and wildfires, and an increase in the number of endangered species and ecosystems. If warming increases to 1.5°C and above, these impacts will increase in severity. It is also unclear on how the additional emissions will be mitigated or reduced to meet Australia's and Queensland's emission reduction targets or align with requirements under the Safeguard Mechanism. The materials provided do not include any information on estimates of greenhouse gas emissions, any mitigation measures, nor how the project can meet the safeguard mechanism requirements.	
	Project justification There is no convincing justification for this project. Rapid reductions in CO₂-e emissions from the coal and steel industry are critical to meeting the Paris agreement targets. For example, the International Energy Agency notes that CO₂-e emissions from steel must reduce by 1.8GtCO₂ by 2030 and 0.2GtCO₂ by 2050. As carbon capture and storage technology fails to deliver, these reduction targets can only be achieved by switching from coal to renewable energy sources. The Proponent details the economic benefits of employment, export earnings, government revenue, and using the resource opportunity available, but it does not address the costs of the environmental and social impacts. The recovery from climate-related weather events is becoming increasingly costly to government and the community. In addition, the impacts on our iconic wildlife (like the koala) and special places (like the Reef) will impact on tourism revenue hence a significant component of our regional economy. We understand that the Proponent is a major 'player' in the fossil fuel industry, but this should not exempt them from environmental and social scrutiny of proposed projects that will impact on environmental and social values. 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, and the desperate need to reduce emissions and slow the impacts of climate change. EnvA is concerned that the consultation period of only ten days was inadequate given the scale and complexity of the Project documentation, which included more than twenty technical documents and	Please refer to Attachment 1 for further detail on how BMA manages GHG emissions and the opportunities BMA continues to explore for further reducing emissions. Extensive technical information and assessment are provided within the Grevillea Pit Continuation Project PD that demonstrates that the Project is not unacceptable, and it does adequately mitigate risks to MNES. The technical documentation submitted has been subject to either Independent Peer Review by technical experts or Peer Review by specialist SMEs. Section 9 (Table 9-1) of the PD demonstrates the Project Compatibility with Section 3A (Ecologically Sustainable Development) of the EPBC Act. Section 10 of the PD provides details on the economic and social impacts as a result of the Project. BMA have followed the assessment process that is lawfully required under the EPBC Act, including public consultation periods of 10 business days. The PD documentation was live on the advertised BHP webpage for two



Submitter Number	Submission	BMA response to submissions
	several hundred pages of material. Such limited timeframes undermine meaningful public participation in environmental decision-making. In summary, the Project would result in the continued expansion of coal mining within an already heavily impacted region, causing further loss of threatened species habitat, additional pressure on surface and groundwater resources, and significant ongoing greenhouse gas emissions over several decades. The proposed offsets do not adequately compensate for these impacts, and the preliminary documentation fails to demonstrate that the Project can avoid significant impacts on MNES. For these reasons, EnvA respectfully submits that the Project should be refused under the EPBC Act. Thank you again for the opportunity to make comment on this proposal.	business days prior to the official public comment period.

Submitter Number	Submission	BMA response to submissions
4	I am authorised by Mackay Conservation Group Inc. (MCG) to make this submission on behalf of the group. MCG is the lead community-based environmental organisation in the Mackay-Isaac-Whitsunday Region, a region with significant existing and proposed mining projects for which this project is proposed. MCG has been actively involved in on-ground environmental work and advocacy for environmental protection in the region since 1984. We provide support to community members who are affected by actions that cause environmental harm. We also conduct environmental education activities and support a number of other groups working in the field of environmental protection and monitoring in the region. We believe that the Project will likely have clearly unacceptable impacts on matters protected under the EPBC Act, specifically threatened species and ecological communities water resources, as well as climate- related impacts on MNES. We believe this Project should be refused under the EPBC Act for the reasons outlined below. The proposed action: The proposed Project is an extension to the Saraji Mine - Grevillea Pit coal mining operations. The proposed Project is located approximately 20km north of Dysart in the Bowen Basin within the Isaac Regional Council area. The intent is to access available resources located within MDL 70021 immediately east of ML1782 which is currently being mined. This Project would extend the footprint of the mine by approximately 220ha and extend the life of the mine until 2055. If approved, the mine extension would prolong the life of the Saraji mine for another 30 years. There is limited information on the mix of coal, the extraction rates, the estimated greenhouse gas emissions or any mitigation measures. It is understood that the project has been deemed a Controlled Action with the following controlling provisions: • Listed threatened species and communities (section 18 and section 18A); and • A water resource, in relation to coal seam gas development and large coal mining development (section 24D and section 24E).	Noted. Please see the below responses.
	Biodiversity:	Noted. Please refer to Section 3.3 of the PD Head Document for impact assessments

Submitter Number	Submission	BMA response to submissions
	Australia is in an extinction crisis. Over the past decade, more than 550 Australian species have been either newly recognised as at risk of extinction or moved a step closer to being erased from the planet. This is part of the more than 2200 entries in the list of threatened Animals, plants and ecological communities in Australia. Australia has the highest mammal extinction rate in the world, with at least 33 species becoming extinct since European invasion and colonisation. We are near the top of the world in biodiversity loss. This is all due to habitat loss, invasive species, pollution, mining and the climate crisis. The Bowen Basin in particular has suffered extensive clearing due to agriculture and mining. Habitat has become fragmented and the cumulative impacts of the removal of threatened vegetation communities must be considered clearly inappropriate. The Project would is likely to impact many threatened species and communities listed under the EPBC Act, with DCCEEW requiring further assessment of seven threatened species and communities. The Preliminary documentation confirms that the project will impact on the habitat of: • Brigalow (Acacia harpophylla dominant and co-dominant) (Endangered) • Poplar box Grassy Woodland on Alluvial Plains (Endangered) • King blue-grass (Dichanthium queenslandicum) (Endangered) • Bluegrass (Dichanthium setosum) (Vulnerable) • Squatter pigeon (southern) (Geophaps scripta scripta) (Vulnerable) • Ornamental snake (Denisonia maculata) (Vulnerable) • Koala (Phascolarctos cinereus) (Endangered) • Greater glider (Petauroides volans) (Endangered) We believe that the clearing of habitat for all the above-listed threatened species and communities constitutes a significant impact that is exacerbated by cumulative habitat loss across the region.	(including significant impact assessments) completed for Greater glider, Koala, Squatter Pigeon, and Ornamental snake. Ornamental snake is the only species identified to be significantly impacted by the Project. Offsets are proposed to compensate for significant impacts to 45.56ha of Ornamental snake habitat. It was confirmed within the PD that impacts to Brigalow TEC, Poplar Box TEC, King Blue-grass, and Bluegrass were unlikely due to absence of habitat from within and proximal to the Project area. Please refer to Sections 3.2.6.1 and 3.2.6.6 of the PD Head Document and Sections 3.2, 3.3.2 and 4.1.1 and Appendix C of the TESIA (Appendix D of the PD) for detailed technical assessments. No regional ecosystems that correspond with the Poplar Box TEC were identified within the Project area and ground-truthing did not confirm presence of Brigalow TEC. While features (e.g., individual species) of the relevant TECs may be mapped, ecological investigation confirmed that the communities present do not meet the DCCEEW criteria for TEC. Detailed assessments are provided in the abovementioned sections of the PD and technical reports.
	Offsets:	The TESIA (Appendix D of the PD) provides detailed information and analysis on the ecological values across the Project area. The values, present and potential future, have

Submitter Number	Submission	BMA response to submissions
	An offset strategy has been developed for the Project to mitigate a net loss to ornamental snake Habitat. We believe that if approved, the Project will also impact on other threatened species and communities which would also be considered for offset requirements. The offset area proposed for the ornamental snake does not provide any addition habitat, but seeks to: - to protect and improve ornamental snake habitat within the Offset Area to a level at which provides greater conservation value than its current form and provides at least the same conservation value as the current impact site. - manage and reduce threats to the ornamental snake within available habitat, and - improve the condition and extent of regrowth vegetation providing / increasing connectivity values. We note that the proposed offset area does not replace the habitat that would be destroyed by this project. The Offset Area Management Plan proposes only marginal improvements to the quality of an already vegetated site where ornamental snakes are already known to occur, and which is located a considerable distance from the project area. The Project would result in the loss and fragmentation of habitat for multiple endangered and vulnerable species within an already heavily cleared bioregion. The proposed offsets fail to satisfy key requirements of the EPBC Act Environmental Offsets Policy, including additionality, enduring protection, and the delivery of a genuine conservation gain. More broadly, the offsets strategy does not address longstanding concerns about the effectiveness of biodiversity offsets. Since the EPBC Offsets Policy was introduced in 2012, biodiversity has continued to decline across all major indicators, including the extent and condition of native vegetation, the number of listed threatened species, and the number of listed threatened ecological communities. Given the cumulative ecological losses, the limited effectiveness of offsets in highly cleared landscapes, and the availability of alternatives that would avoid further habitat destruction, we consider the impacts of this Project to be unacceptable. If the Project is nevertheless approved, the Proponent should be required to offset all habitat loss and have all offsets legally secured, fully implemented, and independently verified as delivering a genuine conservation gain before any ground-disturbing works commence.	been also analysed within this technical document (see for example in Sections 3.2.6.2 and 3.2.6.3 of the PD Head Document which provides this detail on Greater glider and Koala). For clarification, the Project will not result in the fragmentation of habitat values for threatened species or ecological communities. The Project has avoided disturbance to the Phillips Creek riparian corridor as it is recognised to provide important movement and dispersal opportunities for flora and fauna. The offset area and ongoing management measures to compensate the identified significant impacts to Ornamental snake has been selected to meet the Offset Policy, OAG and requirements from DCCEEW. Demonstration of alignment with the Offset Policy includes, but is not limited to, Section 2.4 <i>Compliance with the offset policy</i>, Section 4.2 <i>Management Objectives</i>, and Appendices A and C of the OMP.

Submitter Number	Submission	BMA response to submissions
	However, the best outcome for biodiversity would be to avoid any further direct or indirect impacts to habitat by refusing the Project altogether.	
	Significant Impact on Water Resources: <u>Surface water</u> The Proponent has identified the potential to impact surface water resources through the diversion of drainage features, creation of new temporary and permanent landforms with potential to affect flood waters and through release of water to the surrounding environment. Specifically, the Proponent has identified “potential” impacts to: - The Phillips Creek alluvium, which the Project will reduce the drainage systems and potentially alter creek geomorphology and flow characteristics, and - Impact on the surface water yield of 221ha of the catchment areas of One Mile, Southern, Phillips and Boomerang creeks and the Isaac River. The Proponent also claims that surface water quality impacts will be limited as mine affected waters will be contained within the existing water management system. However, the Proponent also notes that the existing water management system may spill in extreme rainfall events. As the climate change induced severe weather events become more frequent, we believe that these heavy rainfall events are likely to become more frequent and mine water releases into the Great Barrier Reef catchment will also become more frequent. The risk of more MAW water pollution presents a significant and unacceptable impact. <u>Groundwater</u> The Proponent notes that the Project has the potential to impact groundwater resources through direct interaction with aquifers by open cut mining and indirect take from adjacent hydro-stratigraphic units due to changes in hydraulic gradients. Potential impacts to groundwater resources may include: - Reduction in groundwaters and availability for use including ecological, stock watering, and mine water extraction. - Long term impacts associated with ongoing final void pit water evaporation.	Studies completed for the Project assessed surface water impacts of the Project and determined them to be negligible on existing surface water resources, flooding and environmental values (see Section 8 of the Surface Water Assessment Report – Appendix E of the PD). A range of mitigation and management measures have been proposed and are to be implemented for the Project (presented in Section 9 of the Surface Water Assessment Report – Appendix E of the PD). REMPs and FRREMPs provide ongoing environmental monitoring at a catchment scale, establishing and building on environmental trends. Sections 4.2.2.4 <i>Water Quality</i> and 5.2 <i>Water Resources</i> of the PD Head Document details the current (i.e., without the Project) water quality results, and ongoing water management measures. To clarify, iron and manganese occur naturally in elevated concentrations at most sampling locations associated with SRM. The water quality data shows that there is no clear trend between upstream and downstream water quality, indicating no material impact by the current mining operations. Refer to Sections 2.4 and 3.3 of the Surface Water Assessment

Submitter Number	Submission	BMA response to submissions
	Blending and water deterioration due to evaporation from the final proposed action void. The Proponent argues that the current groundwater already has high salinity levels and any additional impacts from dewatering and the final void will be negligible. The Proponent also notes that the predicted cumulative drawdown impacts are not directly related to the project but result from existing coal mining activities. We believe that this Project will add to the cumulative impacts on groundwater in the catchment and that the impacts on ground water from the proposed residual void must be considered as significant.	Report – Appendix E of the PD for further detailed information and assessment. It is noted that TEL were required to manage water at SRM during early 2026. This was following significant rainfall events and managed with the Regulator, DETSI. Any other mine affected water releases are managed in accordance with the SRM EA, as detailed within Section 7.4.2 of the Surface Water Assessment Report (Appendix E of the PD) and <i>Schedule F: Water</i> of the SRM EA (Appendix C of the PD). Regarding groundwater impacts, Section 4.5.3 of the Groundwater Impact Assessment Report (Appendix F of the PD) presents the predicted cumulative drawdown modelled for the Project. It is summarised that the vast majority of predicted cumulative drawdowns are not related to the Project, and instead result from existing authorised mining activities represented in the modelling. This conclusion is made following multiple groundwater model runs (refer to Appendix A within Appendix F of the PD for the methodology) which was subject to Independent Peer Review (refer to Appendix G of the PD for review outcomes), and has been interrogated by the IESC (refer Section 3, and all, of Appendix K for the specific response to the IESC Advice).
	Climate Change:	BMA manages GHG emissions through a combination of corporate strategy and

Submitter Number	Submission	BMA response to submissions
	Australia is a signatory to the Paris Agreement, which commits countries to pursue efforts to limit warming to 1.5°C and well below 2°C. Meeting these targets requires the rapid phase-out and non-expansion of fossil fuel developments. The scientific consensus is clear, expansion of fossil fuel production is incompatible with limiting global warming to safe levels. Expansion of fossil fuel production in 2026 is fundamentally inconsistent with credible 1.5°C pathways and exposes Australia to increased physical, ecological and economic risks. According to the International Energy Agency, reaching net zero emissions by 2050 leaves no room for new coal mines or extensions, including metallurgical coal. The continued accumulation of Greenhouse Gas (GHG) emissions in the atmosphere has already altered Australia's climate, with direct and measurable impacts, including: • Increased frequency and severity of heatwaves, • Longer and more intense fire seasons, • More severe flooding events due to altered rainfall patterns	regulatory compliance. Please refer to Attachment 1 for further detail on how emissions are management and the opportunities BMA continues to explore for further reducing emissions.

Submitter Number	Submission	BMA response to submissions
	Project Justification: There is no convincing justification for this project. As stated above, meeting the Paris Agreement targets requires the rapid phase-out and non-expansion of fossil fuel developments. The Proponent details the economic benefits of employment, export earnings, government revenue, and using the resource opportunity available, but it does not address the costs of the environmental and social impacts. The recovery from climate-related weather events is becoming increasingly costly to the government and the community. In addition, the impacts on our fauna and flora will impact tourism revenue hence a significant component of our regional economy. We believe that this Project is clearly unacceptable 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, and the desperate need to reduce emissions and slow the impacts of climate change. We believe that a much better outcome for the local and regional economy and community would be a staged withdrawal from the Saraji Mine, and financial support from the Proponent to a regional economic transition plan for the region. Conclusion: For the reasons outlined above, the Project presents unacceptable and inadequately mitigated risks to biodiversity, water resources, climate, and human rights, and as such the application should be refused.	Steelmaking coal is a primary ingredient in the conventional blast furnace steelmaking process. Steel is one of the most widely used building materials on earth. The higher-quality coal BMA mines will continue to play an important role in steel production for decades to come. Metallurgical coal demand from South East Asia and India is expected to increase for decades to come. Extensive technical information and assessment are provided within the Grevillea Pit Continuation Project PD that demonstrates that the Project is not unacceptable, and it does adequately mitigate risks to MNES. Section 9 (Table 9-1) of the PD demonstrates the Project Compatibility with Section 3A (Ecologically Sustainable Development) of the EPBC Act. Section 10 of the PD provides details on the economic and social impacts as a result of the Project.

Attachment 1 – Climate and Emissions response

BMA SRM - Grevillea Pit Continuation Project Decarbonisation Response

BHP Mitsubishi Alliance (BMA), as part of the BHP Group, manages greenhouse gas (GHG) emissions through a combination of corporate strategy and regulatory compliance. BHP's Climate Transition Action Plan 2024 (CTAP) outlines its approach to decarbonisation, including investment in renewable energy, electrification technologies and collaboration across the value chain. BHP's CTAP also sets out how and when it may use voluntary and regulatory carbon credits, including its expectations in relation to how offsetting from customers, suppliers and other third parties will play a role in decarbonisation in the value chain. These frameworks apply to the Project through BMA's adoption of BHP's policies and management systems.

BHP has set a target to reduce operational (Scope 1 & 2) GHG emissions by at least 30 per cent by FY2030 from an FY2020 baseline, and an ambition to achieve net zero operational emissions by FY2050, with Scope 3 emissions addressed through medium-term goals and a long-term net zero ambition supported by collaboration across the value chain. Further information, including in relation to BHP's Scope 3 targets and goals, is available in the [Climate Transition Action Plan 2024](#).

BMA operates multiple assets across the Bowen Basin, as well as the Hay Point Coal Terminal near Mackay. Further, this occurs within the broader context of BHP's other Australian and international mining and mineral processing operations. Accordingly, initiatives and opportunities to manage and minimise GHG emissions are considered at a portfolio level, rather than being limited to individual operations or projects, and benefit from the leverage with suppliers and learnings from trials at other assets that membership of the BHP Group offers.

Operational emissions are administered within Australia's primary regulatory framework, the Safeguard Mechanism, which applies to facilities emitting more than 100,000 t CO₂-e per year of Scope 1 emissions measured and reported under the National Greenhouse and Energy Reporting (NGER) Scheme. This framework establishes declining emissions baselines over time and requires the surrender of eligible carbon units where emissions exceed those baselines. Within this context, the Project incorporates measures to reduce emissions where practicable, including efficient design, management of fugitive emissions, and the use of renewable electricity. Opportunities for further emissions reductions, such as the electrification of equipment, continue to be explored, while Scope 3 emissions are addressed through collaboration and influence across the value chain.

Mitigation Plans

Relatively Low Emissions Intensity and Efficient Project Design

The SRM resource has a relatively low emissions intensity compared to other Australian coal operations, reflecting an inherently less emissions-intensive resource and good productivity. Building on this, the Project incorporates a range of design and operational measures intended to minimise greenhouse gas (GHG) emissions during operation. These include prioritising the procurement of fuel-efficient mining equipment, maintaining equipment in optimal operating condition to support maximum fuel efficiency, and ensuring that equipment is appropriately sized for each task to avoid unnecessary energy use and inefficiencies.

Scope 1 Diesel Emissions

BHP considers the electrification of diesel-powered mining equipment as a potential pathway to manage Scope 1 emissions, with a focus on progressively transitioning key fuel users such as haul trucks and ancillary equipment from diesel to electricity. While electrification has been identified as a promising option, it is acknowledged that relevant technologies are still at an early stage of development. To support this transition, BHP is collaborating with equipment vendors and industry partners globally to accelerate the development and deployment of electrification solutions, while also investigating power infrastructure such as renewable energy supply, energy storage, and grid interconnection options to accommodate the anticipated growth in future electricity demand. Implementation pathways and timelines will continue to develop as the technology matures.

Scope 1 Fugitives (Open Cut)

SRM is one of the least methane-intensive metallurgical coal mines in Australia and probably the world. Scope 1 fugitive emissions management from open cut operations remains challenging due to the diffuse nature of these emissions. BMA is progressing a combination of gas drainage (supported by ongoing studies and trials) and operational controls to manage its open cut fugitive emissions.

Where gas capture is potentially viable in future, management options include flaring or beneficial use, with consideration of both on-site utilisation and third-party off-site applications in line with the GHG abatement hierarchy. The selection and implementation of these measures will depend on site-specific geological conditions, gas content and technology readiness, and continue to be refined through ongoing investigation and field trials.

Scope 1 Safeguard Mechanism Compliance

Scope 1 emissions from the Project's operations activity will be incorporated within SRM's classification as an 'existing facility' under the Safeguard Mechanism. BMA will comply with all Safeguard Mechanism requirements as the responsible emitter, including surrendering the appropriate number of Australian Carbon Credit Units (ACCUs), Safeguard Mechanism Credit (SMCs) or other prescribed carbon units to offset any emissions that exceed the facility's baseline.

Where ACCUs surrendered are equal to or exceed 30% of the Project's baseline, BMA will be required to provide an explanatory statement to the Clean Energy Regulator in accordance with the National Greenhouse and Energy Reporting (Safeguard Mechanism) Rule 2015, with such statements made publicly available. Overall, Scope 1 emissions associated with the Project will be managed in line with current Safeguard Mechanism requirements, as well as any future amendments arising from ongoing policy development and review.

Scope 2 Electricity Emissions

BMA has halved its emissions from electricity consumption through renewable power purchasing arrangements with CleanCo and plans, based on current forecast power demand, to reduce Scope 2 emissions to zero from FY2027 through the maintenance of similar arrangements into the future.

Renewable electricity supply supported by Large-scale Generation Certificates (LGCs) is proposed for the Project, with the objective of achieving 100 per cent renewable electricity offset. This approach supports compliance with relevant energy and emissions reporting frameworks and should enable the reporting of zero Scope 2 emissions, subject to applicable methodologies and the voluntary surrendering of LGCs, where required.

Scope 3 emissions

Scope 3 greenhouse gas (GHG) emissions associated with the Project arise primarily from the upstream supply of energy and services to SRM and the downstream transportation and use of product coal. These emissions occur outside the operational control of BMA and are therefore not directly managed by the Project.

While Scope 3 emissions are not controlled by the Project, their importance is recognised, and opportunities to support value chain decarbonisation are considered where reasonably practicable. Consistent with BHP's Climate Transition Action Plan 2024, the approach to Scope 3 emissions focuses on collaboration and influence across the value chain, including engagement with customers, suppliers and logistics providers to support emissions-efficient practices and the development of lower-emissions technologies. BHP supports initiatives aimed at reducing emissions associated with steel production and product transport, including collaboration on low-emissions steelmaking technologies and the use of lower-emissions fuels and efficiencies in maritime logistics.