

Guide for making a public comment about Whitehaven Coal's Narrabri coal mine.



We have a critical window to raise our concerns about the devastating impacts of the Whitehaven Coal's Narrabri coal mine expansion on our climate and thousands of matters of national environmental significance. The window closes on Thursday 24 November.

About Whitehaven Coal's Narrabri coal mine expansion

Whitehaven Coal proposes to extend underground mining operations at the existing Narrabri mine to dig an additional 82 million tonnes of coal fuelling approximately 259 million tonnes of carbon emissions.



The location: Approximately 25 km south east of Narrabri and approximately 60 km north west of Gunnedah, within the Narrabri Shire Council.

The company: The Narrabri Mine is operated by Narrabri Coal Operations Pty Ltd, on behalf of the Narrabri Mine Joint Venture, which includes Whitehaven Coal Limited's wholly owned subsidiary Narrabri Coal Pty Ltd.

Their proposal: To extend the approved underground mining area and gain access to additional coal reserves which would increase the mine life to 2044, an additional 13 years. The Proposed Project will involve the extraction of an additional approximately 82 million tonnes of coal, an increase from 170 to 252 million tonnes.

The legal challenge: Environmental Justice Australia lawyers, on behalf of their client Environment Centre of Central Queensland (ECoCeQ), submitted a reconsideration request to The Minister for the Environment, Tanya Plibersek, asking her to reconsider the first stage of the assessment of Whitehaven Coal's Narrabri coal expansion proposal. [Read more about this legal intervention.](#)

What's happening now: The Minister must consider significant new information and account for the detrimental effect of climate change on several thousand matters of environmental significance. Right now, she is inviting public comments on this decision.

How to make a public comment on Whitehaven Coal's Narrabri coal mine plans

The Minister will reconsider the first decision of the environmental approvals process, where a previous Environment Minister decided which nationally protected animals, places and plants could be impacted by this project.

That problem is that the past decision didn't consider at all or properly take into account the climate impacts of this project's carbon emissions.

Making a comment takes just a few minutes and everything you need is in this document.

A step-by-step guide to making your comment

Start by opening the government's website in a new window, [by clicking here.](#)

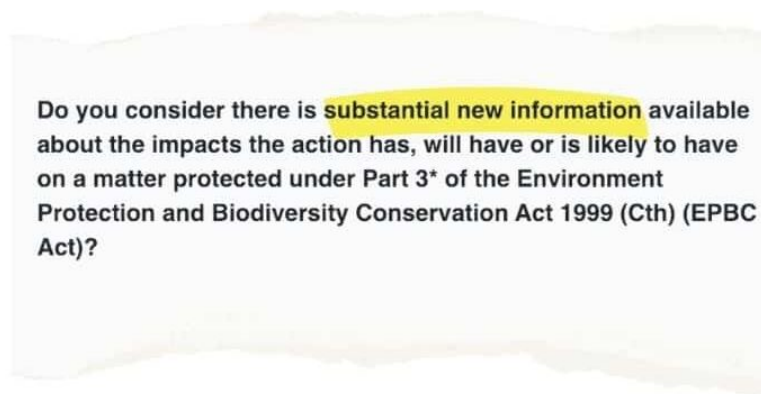
We suggest you draft your public comment on your computer in a Word document, then copy it onto the government webpage.

You can re-use your answers for all 18 projects – just copy and paste your answers onto each project's comment page.

1. Fill in your details.

1. If you haven't already, open the government's website in a new window.
2. Begin by adding a title for your comment, such as "Please reassess the environmental impact of this mine"
3. Then type in your full name and email address

2. The "substantial new information" box - tick YES



What does “substantial new information” mean?

Under our Federal environmental laws, the material ECoCeQ has lodged with the Minister must meet the threshold of “substantial new information”. This means the information must be substantial, and also new.

You can read the materials [ECoCeQ lodged with the Minister](#).

You can also read ECoCeQ's [explanation of all of this material](#).

In this context, “substantial” means information that is real and not trivial, and which is a form of factual evidence.

ECoCeQ and their Environmental Justice Australia legal team assert there is substantial new information about the climate harm from this project.

For example, ECoCeQ argues that the material is substantial because the documents it has lodged with the Minister demonstrate a global scientific consensus that widespread and catastrophic harm to ecosystems, species and the biosphere as a whole is in train as a result of the greenhouse gas emissions created by burning fossil fuels.

They also argue the material demonstrates the impacts Narrabri mine expansion has, will have or is likely to have on nationally significant animals, plants and

places protected under federal environmental laws (called “Matters of National Environmental Significance.”)

If you agree, select YES.

If you are unsure, you can skip the question.

3. Provide reasons for your answer or comments

This is where you could urge the Minister to recognise that the material that ECoCeQ provided in their reconsideration request clearly meets the threshold of ‘substantial new information.’

You could share why you believe this material is substantial – for example, because it outlines the vast and irreversible climate risks to thousands of nationally protected animals, places and plants.

You can write a sentence or two, or up to 500 words.

Here’s more information you could mention:

- **ECoCeQ has provided the Minister with [thousands of documents](#)** detailing the impact of this mine on nationally significant animals, plants, ecosystems and places (which are “matters of national environmental significance” protected under the EPBC Act. This is a vast repository of evidence and analysis and includes, for example the 2021 and 2022 IPCC reports, as well as the 2021 State of the Environment Report.
- **You can [search](#) or [explore this evidence](#)**, which details the climate impacts of Whitehaven’s mine expansion to thousands of animals, plants, ecosystems and places.
- **If you’re looking for key species and places to highlight**, there are some key examples in this part of the evidence as well – such as the [Australian Alpine ecosystems](#), [Great Barrier Reef](#) and [koalas](#). We’ve also [highlighted some here](#).
- You could also note that the information about the climate impacts of the project is new because **this information was not considered at the first decision for this project**, because it did not exist when the first decision was made or was not before the decision maker when the first decision was made.

4. The "substantial change in circumstances" box - tick NO

This second YES/NO question asks:

Do you consider there has been a substantial change in circumstances that was not foreseen at the time of the first referral decision and that relates to the impacts the action has, or will have or is likely to have on a matter protected under Part 3* of the EPBC Act?

ECoCeQ is not relying on this argument. As explained above, ECoCeQ is arguing that the Minister should reconsider the environmental assessment of the Narrabri mine expansion based on “substantial new information” and so this question is irrelevant.

We suggest you mark this question “No” and type “N/A” in the comment.

5. Add reasons or comments - write N/A

ECoCeQ is not relying on this argument, and so you can type “N/A”.

6. Add any other comments

This section invites you to write any other comments.

If applicable, provide **any other comments** on whether you consider there are reasons to revoke the first referral decision and substitute a new decision. This may include any other comments on whether a matter referred to in any of paragraphs 78(1)(a) to (ca) of the EPBC Act applies in relation to the action. (The current version of the EPBC Act can be accessed through the [Department's website](#)).

In this section, you could share your views on whether the Minister should make a new decision about the coal mine expansion.

You could write a few lines detailing why you are concerned about the impact of this proposal on Australia's Living Wonders – such as the Great Barrier Reef, Commonwealth

Marine Areas, threatened animals, plants and ecosystems, marine and migratory species and marine environments and World and National Heritage places. You might like to write about the impacts to the koala, the dugong, Kakadu or Shark Bay or other protected species or places that are important to you.

You could write about how the 'substantial new information' submitted by EcoCeQ demonstrates the Narrabri mine project is having, will have or is likely to have a 'significant impact' on our Living Wonders.

But you don't have to be an expert – you can also just ask the Minister to look at the 3000 scientific documents provided by ECoCeQ and accept that the only conclusion the evidence leads to is that she should vary the original decision to recognise the likely climate harms of this new coal proposal.

This evidence demonstrates the vast and irreversible consequences new coal mines and gas plants like Narrabri would have on our Living Wonders.

7. Final steps: Confidentiality and privacy

Tick the Yes/No box to indicate whether your comment is confidential.

Then read the privacy statement and declaration.

8. Lucky last, click "Submit your comment!"

And you're done!

Thanks so much for registering your concerns with this project – and for speaking up for our climate, our communities and our living wonders.

Now write another public comment! It's much easier the second time round - we promise! Until Thursday 24 November, the Minister is accepting public comments about the environmental impact of 18 coal and gas proposals.