



18 August 2025

Submission – Yallourn Declared Mine Rehabilitation Plan

Environment Victoria welcomes the opportunity to comment on the Yallourn Declared Mine Rehabilitation Plan (DMRP). We appreciate the steps EnergyAustralia has taken to share their plans with the community, including online briefings, a presence at community events and markets and straightforward plain language and explainers.

EnergyAustralia's commitment to a responsible and respectful transition for the region, provides a strong foundation for a rehabilitation project that will deliver the best possible outcomes for the local community and their environment. Safeguarding the Morwell and Latrobe River systems through mine rehabilitation and beyond, will be crucial to deliver on promises to the community.

About Environment Victoria

Environment Victoria is the leading not-for-profit environmental advocacy organisation in Victoria. With 96 grassroots member groups and over 200,000 individual supporters, we've been representing Victorian communities on environmental matters for over 55 years. Through advocacy, education and empowerment, Environment Victoria seeks significant and enduring solutions that will safeguard the environment and future wellbeing of all Victorians.

We've worked alongside Latrobe Valley communities for many years to advocate for a fair and responsible transition beyond coal.

We ask EnergyAustralia to address the following issues before submitting its Yallourn DMRP:

1. Independent assessment of Morwell River Diversion (MRD) risks

The MRD's collapse in 2012 and further damage in 2021 demonstrate its vulnerability (ABC News, 2012; EnergyAustralia, 2021). EnergyAustralia's own feasibility studies acknowledge the diversion may not survive over time, even in a reduced form (EnergyAustralia, 2025b). Rehabilitation designs must therefore be based on independent failure-mode analysis and best-practice

engineering standards. Any new structure should be built to maintain or enhance environmental flows under a range of hydrologic and climate futures (West Gippsland CMA, 2023).

2. Protecting Morwell River flows and the Latrobe system

The plan anticipates replacing the MRD with a smaller levee designed to carry only minimal “environmental flows” (EnergyAustralia, 2025b). Given the uncertainty over its stability, even these reduced flows cannot be guaranteed. The Morwell River now effectively serves as the headwaters of the Durt’Yowan (Latrobe River), and loss of its seasonal high flows and floods would deprive the system of fresh water, nutrients and sediment needed to sustain wetlands, aquatic life and to flush the salt wedge from Lake Wellington (West Gippsland CMA, 2023).

Without enforceable guarantees, most of the Morwell River’s mean annual runoff risks being diverted into the mine pit, with only occasional trickles reaching the Latrobe in very wet years (Friends of Latrobe Water, 2025). This would have potentially irreversible impacts on the Latrobe River, the Ramsar-listed Gippsland Lakes, and on irrigators and other downstream users (?) dependent on secure water supply (West Gippsland CMA, 2023).

3. Scale of water demand

The DMRP proposes using around 665 GL of water to fill the mine void (EnergyAustralia, 2025b) — more than the volume of Sydney Harbour (Bureau of Meteorology, 2016) — at a time when climate projections indicate up to 30% less water in the catchment (DEECA, 2022). Relying on this volume from a stressed river system risks unacceptable harm to river health and Ramsar-listed wetlands (West Gippsland CMA, 2023).

Alternatives such as recycled or desalinated water were dismissed largely on cost grounds, assuming surface water costs just \$11.55/ML (EnergyAustralia, 2025b). With the Victorian Government now consulting on charging a price that reflects the economic value of water (DEECA, 2025), alternatives become more viable. Committing to climate-independent sources would safeguard rivers, protect cultural flows, and future-proof the project (West Gippsland CMA, 2023).

4. Stronger safeguards and oversight

As drafted, the plan lacks binding commitments to protect environmental flows, integrate adaptive climate planning, and ensure transparent oversight. Clear allocation of responsibilities between EnergyAustralia and government, robust compliance mechanisms, and genuine inclusion of Traditional Owners and local communities will be essential to building trust and delivering the project in line with EnergyAustralia’s stated values (EnergyAustralia, 2025a).

Our recommendations

- Guarantee the Morwell River’s seasonal high flows and floods reach the Latrobe before any flood harvesting into the pit is permitted (Friends of Latrobe Water, 2025).
- Make surface water a last resort, with conditions that protect ecological and cultural flows (West Gippsland CMA, 2023).
- Re-assess water source options using a realistic, policy-aligned river water price (DEECA, 2025).
- Undertake independent MRD failure-mode analysis and build to best-practice standards (EnergyAustralia, 2025b).
- Lock in environmental flows as a non-negotiable constraint (DEECA, 2022).
- Commit to transparent governance with genuine inclusion of Traditional Owners and the broader community (EnergyAustralia, 2025a).

By proactively addressing these challenges, EnergyAustralia can set a benchmark for responsible mine closure, safeguard rivers and communities, and create a legacy in Victoria that the company can be proud.

Please feel free to contact me on the details below should you wish to discuss our submission in more detail.

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References

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- Bureau of Meteorology (2016). *When dam size matters*.
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- EnergyAustralia (2025b). *Yallourn Declared Mine Rehabilitation Plan – Summary Document*.
- Friends of Latrobe Water (2025). *Submission on Morwell River flows*.
- West Gippsland CMA (2023). *Transformation of the Latrobe: Pathways for the Latrobe River System*.