

HAVE YOUR SAY ON THE CLEAN-UP OF HAZELWOOD MINE

Engie wants to turn the old Hazelwood coal mine into a pit lake, but hasn't said what it will be used for or shown it will ever be safe. Until 2 November 2026, you can make a submission and let the government and the mine owners know that Victorians expect more.

Submissions close 11:59pm, Monday 2 November 2026

Make a submission through Engage Victoria's Website.

Mine rehabilitation will shape the Latrobe Valley for generations

Three giant coal mines, Hazelwood, Yallourn and Loy Yang, are closing or have closed, and each leaves a pit hundreds of metres deep. How the pits are rehabilitated will affect water security, land stability, local rivers and the Gippsland Lakes, and what the land can be used for in future.

Hazelwood is the first of the three to go through this process. What is accepted here will set the standard for the other two.



ENGIE IS PROMISING A COMMUNITY ASSET BUT HASN'T DONE THE WORK

Latrobe Valley communities have the right to expect a high standard rehabilitation plan for the old Hazelwood coal mine that is based on comprehensive analysis. Engie's EES needs to show that their plan can deliver the benefits they are spruiking, and it needs to provide for the ongoing management of potential issues.

Without this, it's not a plan – it's marketing.

The EES Engie has presented sets a low bar. Engie exempts itself from industry standards that are used around Australia and worldwide, and sets a course for declining water quality with no guarantee that the community or wildlife will ever be able to safely use the pit lake. This sets a dangerously low precedent for the three massive Latrobe Valley coal mines. Engie tells us it is aiming for a safe, stable and sustainable final landform, but the EES simply does not demonstrate that the proposed pit lake will be genuinely passive, sustainable in the long term and non-polluting.

There are solutions to these problems. Now it is up to community members to have a say and demand better.

HOW TO MAKE A SUBMISSION

Anyone can make a submission. It can be a few paragraphs about what matters to you. A submission is your chance to put your views to the Inquiry and Advisory Committee (IAC) that will assess the EES and report on it.

Submissions can be made through Engage Victoria before the deadline: 11:59pm, Monday 2 November 2026

1. Tell the committee why this matters to you. Your connection to the Latrobe Valley, local rivers or the Gippsland Lakes, and what you hope for the site.
2. Say what you're concerned about and what you'd like to see changed. You can read our concerns and recommendations below, and review relevant parts of the official EES here <link to EES docs>.
3. Lodge your submission online through Engage Victoria by 11.59pm Monday 2 November.
4. Ask to be heard. The committee must consider every written submission - and if you're up for it – you can also mark the check box to indicate you're willing to appear before the committee, a great way to make your case.

IF YOU ONLY HAVE TIME FOR A FEW LINES, HERE ARE THE THINGS WE THINK ARE KEY:

1. Start with a real vision

Rehabilitation should begin with a realistic picture of what the site will ultimately be used for (recreation, wildlife, healthy waterways), worked out with the community and Traditional Owners, so the plan can be designed for it. Engie hasn't set out this vision, and it's reasonable for the community to expect better.

2. Connecting the pit lake to the Morwell River adds risk and solves nothing

Connecting the pit lake to the river brings serious risks to the river and its wildlife, and requires ongoing management, without offering any compelling benefits.

3. The water modelling is underdone

It doesn't run long enough and doesn't cover all contaminants. It doesn't show the pit lake will ever be safe to use, or that downstream impacts are managed.

4. Vague closure criteria keep kicking the can down the road

Without clear, measurable targets and named responsibility, there's no way to tell when the job is done, or to hold anyone to it.

If you'd like to dig a little deeper, you can dig into some of the more detailed concerns below.

TIPS:

- You don't need technical expertise. Writing from your own experience is valuable.
- Your own words count for more than copied text. Use the starting points below as a prompt, then make it yours.
- A short submission that is clear is better than a long one that is vague.

1. Claiming best practice while ignoring it

In short: Engie says it follows good practice, but the EES barely refers to it. Ask for the project to be described, tested and justified against recognised mine closure guidance.

There are well-established best practice guidelines directly relevant to this project, including:

- International Council on Mining and Metals (ICMM), 2025. Integrated Mine Closure: Good Practice Guide.
- Australian and New Zealand Governments (ANZG), 2018. Australian and New Zealand Guidelines for fresh and marine water quality.
- Department of Foreign Affairs and Trade (DFAT), 2016. Leading Practice Sustainable Development Program for the Mining Industry - Mine Closure; - Preventing Acid and Metalliferous Drainage Handbook.
- WA Department of Mines, Industry Regulation and Safety (DMIRS), 2020. Mine Closure Plan Guidance – How to prepare a mine closure plan in accordance with Part 1 of the Statutory guidelines for mine closure plans.

There is also a wealth of recent scientific literature on best practices for mine closures and pit lakes.

Unfortunately, Engie's EES contains few references to leading practice and science on the analysis and management of pit lakes, including water balance, quality, stratification and mixing, and resulting interpretation and management recommendations.

If Engie wants to claim good closure practice, the EES needs to show that they understand good practice and have followed it. They need to describe the project according to good practice and formulate and test their proposed strategies accordingly.

2. Dismissing relevant standards and citing irrelevant standards

In short: Engie chooses benchmarks that make the lake look better than it is. Ask for the freshwater ecosystem guidelines at 99% species protection, covering all contaminants and not just dissolved ones.

Engie dismisses the Australian and New Zealand Guidelines for freshwater aquatic ecosystems as "highly conservative". In fact, these are the appropriate guidelines for pit lakes because they ensure that all water quality values are covered, including not just aquatic life, but other wildlife such as resting, breeding and feeding birds.

Engie also tests against the lower benchmark for 95% species protection under these freshwater aquatic guidelines. They should be using 99% species protection benchmarks, because of the potential for chemicals to bioaccumulate and biomagnify through the food chain and through direct exposure.

Either way, the pit lake water quality fails to meet the lower benchmarks for aluminium, copper, chromium and zinc. The modelling shows increasing toxicity over time, resulting in declining ecosystem health.

Engie models against livestock and drinking water guidelines – but there is no plan to use the pit lake for livestock or drinking water. Furthermore, the modelling only includes dissolved contaminants, when it should include all contaminants. And it assumes that many metal contaminants will only occur in non-toxic forms without substantiating this claim.

3. The water quality modelling ends too soon

In short: At 100 years, metals and salinity are still rising, which hides problems. Ask for modelling over 200 to 500+ years.

The EES water quality modelling horizon of 100 years – including the decades it will take to fill the pit – is insufficient to show long term biological and chemical stability. As it stands, at the point the modelling period ends the concentrations of metals, salinity and other contaminants are still increasing – conveniently concealing many exceedances.

The Independent Expert Scientific Committee on Unconventional Gas Development and Large Coal Mining Development (IESC) advised in 2025 that Engie should model contaminants beyond 100 years – and Engie dismissed this advice.

Engie simply cannot claim that the pit lake will be a sustainable, non-pollution landform that is appropriate to hand back to the local community.

The water quality modelling needs to cover distinct phases spanning 200 to 500+ years, in line with industry leading practice.

4. Connecting the pit lake to the Morwell River hasn't been justified

In short: The connection puts the river and its wildlife at serious risk to save only 0.3 to 1.1 years of filling time. Ask for the pit lake not to be connected to the Morwell River.

Engie proposes to connect the pit lake to the Morwell River via a constructed channel and inlet with engineered gates in order to take peak flows from the river. They say this would reduce reliance on surface water from Moondarra Reservoir and pumped groundwater and support a faster fill of the pit lake. However, serious concerns have been raised about this option.

Many of the potential impacts of the project are associated with the connected scenario, including:

- Clearing an additional 0.743 ha of Swampy Riparian Woodland
- Reduced flows in the middle Latrobe River at Thoms Bridge
- Entrapment, injury and impeded migration of aquatic fauna
- Deteriorating water quality from metals and nutrients from pit lake discharge to the Morwell River
- Increased nutrients in the pit lake due to input from Morwell River floodwaters, feeding harmful algal blooms
- Catastrophic capture of the Morwell River if the inlet structure fails, with likely severe downstream impacts in the Morwell and Latrobe Rivers – noting this has already happened with Yallourn mine
- Changes in erosion and sedimentation dynamics in the Morwell River.

All of these risks are avoidable if the pit lake is not connected with the river. And interconnection only reduces the filling time by 0.3 to 1.1 years.

The proposed engineered gates would require active management forever – this risks long term financial viability and is inconsistent with Engie's claim that the final landform will be passive. The EES is not clear on who will be responsible for monitoring and managing the pit lake into the future – nor how that will be funded.

5. Groundwater has not been studied sufficiently

In short: This is really a groundwater rehabilitation project, but groundwater ecosystems and chemistry haven't been properly studied. Ask for surveys of groundwater dependent ecosystems and modelling of groundwater effects, including top-ups.

The Hazelwood mine rehabilitation is fundamentally a groundwater rehabilitation project. There is already groundwater contamination present, and groundwater is being extracted to fill the lake. It may also need to be extracted in future, as up to 5 GL/year will be needed to top up the lake.

There is little data on the occurrence and distribution of groundwater dependent ecosystems that could be impacted by the proposal. The IESC in 2025 advised that Engie should conduct more surveys of these ecosystems, but Engie, again, dismissed the advice.

The EES hasn't made clear how groundwater chemistry will affect the pit lake water quality, including from top-ups after filling. Engie needs to do more modelling.

6. The serious risk of hazardous algal blooms has been overlooked

In short: A pit lake creates a new risk of toxic algal blooms, and the modelling ignores it. Ask for nutrient cycles to be modelled and the risk included in Engie's risk assessments

The proposed pit lake creates a new source, habitat and transport pathway for hazardous blue-green algal (cyanobacteria) blooms, which form when excess nutrients combine with thermal stratification (or layering) of water.

Algal blooms are toxic – they can make the pit lake unfit for use and they can negatively impact the Morwell River and other downstream areas such as the Gippsland Lakes.

Engie has not considered nutrient cycles in its water quality modelling. They dismiss the risk of harmful algal blooms as comparable to other human-made waterbodies – but in creating the pit lake they are creating a new risk with high likelihood and significant consequences.

Engie need to model this aspect of water quality, using appropriate standards, and include it in risk assessments.

7. The ash dump inside the mine void lacks analysis and public transparency

In short: Only Engie and the EPA know what's in the ash dump that will be submerged. Ask Engie to publish its studies and model contaminants well beyond 100 years.

The Hazelwood Ash Retention Area (HARA) is an ash landfill that will be submerged inside the pit lake. Coal ash can contain serious contamination, or it can be benign, but Engie have never been transparent about what is contained in the HARA.

In fact, the treatment of the HARA is not fully included in the EES, instead being negotiated behind closed doors with the Environment Protection Authority (EPA). As a result, it has also not been subject to the oversight of the Independent Expert Scientific Committee (IESC).

If the community is expected to eventually make use of the pit lake, they deserve to know what has been buried there. Engie needs to publish the studies that have already been done.

The EES also needs to incorporate full contaminant modelling over the filling period and far beyond 100 years, including the effects of weathering, waves, chemical processes and more.

What does Engie need to do?

- Mine rehabilitation using pit lakes is well understood and can be done well. The community doesn't have to accept a second-rate proposal for a contaminated lake that gets worse over time. Engie needs to:
- Start with a vision. Establish realistic outcomes for post-mining land use in genuine consultation with the local community, Traditional Owners and other key stakeholders. Conduct a multi-criteria analysis (MCA) using quantified, transparent measures and weightings to determine the best option for rehabilitation. The MCA included in the EES is opaque and appears self-serving.
- Work to recognised, industry-leading practice based on the wealth of scientific knowledge that exists. Draw on the many experts outside Victoria if local expertise is wanting.
- Model water quality for the long term. A comprehensive model must show that the lake and downstream waters will meet defined objectives over the relevant timescale.
- Do site-specific ecological risk assessment using the appropriate standards and based on complete information. Engie can't pick and choose which standards apply, and must collect data where there are gaps.
- Weigh benefits against costs. Recreation, productive use, ecological benefits and flood mitigation need to be assessed alongside water demand, residual contamination, safety restrictions, maintenance and long-term governance
- Say who is responsible if something goes wrong. Quantify liabilities and specify what happens if control measures fail, reality does not follow what has been modelled, or water quality deteriorates after filling. This needs to include who is responsible and how is it funded.
- Set 'SMART' closure criterias – specific, measurable, achievable, relevant and time-bound-tied to clear objectives relevant to the identified post-mining land uses.
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