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27 February 2026

RE: Submission - Centurion North Mine major amendment (A-EA-AMD-100973471)

Thank you for the opportunity to make this submission in response to the proposed major amendment to the Centurion North Environmental Authority (EA): P-EA-100658735 and Progressive Rehabilitation and Closure Plan (PRCP): P-PRCP-100669070_V4 (Project), under the *Environmental Protection Act 1994 (EP Act)*.

This submission addresses the matters required to be considered under the “standard criteria” in s191 of the EP Act and explains why the proposed amendment should be refused.

Environmental Advocacy in Central Queensland

Environmental Advocacy in Central Queensland (EnvA) is a Central Queensland community 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, and
- will further degrade wildlife habitats of state and national significance through both habitat loss and climate change.

The Project

Centurion Coal Mining Pty Ltd, a subsidiary of Peabody Energy Australia Pty Ltd (Proponent), is proposing to develop a large-scale, underground longwall coal mine operation with associated coal seam gas extraction (CND). The Project proposes to undertake exploration activities and advance the development of longwall mining to support the early stage development for the larger CND proposal, and to extract between one and two million tonnes of coal over the 28-year life of the project.



The proposed complete mine area is approximately 4,568 hectares (**ha**) on mining leases (**ML**) ML1790 and ML70495, and the south-west portion of Mineral Development License (**MDL**) 3010. The application for this current Project would be located on ML1790 and would cover 197.41ha. 13.2ha of this disturbance has previously been approved (P-EA-100658735).

The Project would be located approximately 40km north-west of Moranbah in Central Queensland.

The proposed project, if approved, will involve:

- construction of new access tracks,
- installation of a laydown area,
- construction of drill pads for Surface-to-Inseam (**SIS**) and Vertical Production Wells (VPW),
- drilling and operation of vertical and lateral SIS wells to drain gas from coal seams,
- construction of gas risers to manage gas transfer to surface facilities,
- construction of service boreholes to transfer materials from the surface to underground,
- drilling of boreholes for sampling of gas, coal propensity, geotechnical and exploration,
- development of a bleeder shaft for mine ventilation and safe gas management;
- construction of four underground gate roads to support early-stage project development,
- disturbance for future goaf drainage lines, and
- completion of underground in-seam gas drainage.¹

The proposed amendment will result in a major amendment application for the PRCP schedule as the date for the completion of all rehabilitation will be extended by 29 years a rehabilitation completion date of December 2075 – twenty years after the completion of mining activities.

The proposed amendment would extend the rehabilitation completion date to December 2075, approximately 20 years after cessation of mining activities and 29 years beyond the currently approved timeframe.

ROM coal extraction is expected 1-2 million tonnes of coal over the 28 year life of the project (section 3.3.1.2 of the Supporting Information)².

ENVA'S SUBMISSION – RECOMMENDATIONS

EnvA submits that the application must be refused pursuant to s191 of the EP Act because it fails to satisfy the standard criteria. EnvA recommends that:

1. The decision-maker should require that the Project be referred under the EPBC Act, including through the exercise of powers under s69 due to the stated significant impacts on Matters of National Environmental Significance (**MNES**).
2. That the EA amendment be refused and the Project be assessed through a single EIS process as part of the broader Centurion North Development (**CND**) development as consistent with the application submitted to, and accepted by, the Office of the Coordinator-General as a coordinated project.
3. That the Project is determined to be a component of a staged project, and that an EIS assessment is required consistent with the Guideline: Criteria for environmental impact statements for resource projects under the *Environmental Protection Act 1994*.

¹ [Centurion Coal Mining Pty Ltd \(2025\) Application to amend P-EA-100658735 and P-PRCP-100669070_V4](#)

² [SLR \(23 Jan 2026\) Centurion North Extension Project: Environmental Authority Amendment Application Supporting Information](#)

4. That the PRCP plan and offsets proposed should be refused as they are not aligned with the protection of threatened species and communities, water resources, the general environment and are contrary to human rights.

Further background to our submission is provided below.

GROUNDS FOR SUBMISSION

Approval process

EnvA notes that the Proponent has already identified that this Project will have a significant impact on Matters of State Environmental Significance (**MSSES**) and Matters of National Environmental Significance (**MNES**) including:

- Threatened species and communities,
- Migratory species, and
- Water resources in relation to large coal mining development or coal seam gas.³

EnvA acknowledges that the Proponent has referred the CND project for assessment under the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*. However, the EPBC referral application (EPBC 2026/10419) excludes activities authorised under P-EA-100658735 and proposed amendments to this EA.

As far as EnvA can ascertain, the previously approved EA and the proposed major amendments to the EA have not been referred for assessment under the EPBC Act, despite identified significant impacts on MNES. For example, Table 12 of the Assessment of Matters of State Environmental Significance report⁴ submitted in support of the EA amendment application summarises the impacts on some of the MNES listed species. There are also likely to be significant impacts on water resources from the proposed exploratory and preparation works.

If the Project proceeds without referral and approval under the EPBC Act, and it has or is likely to have a significant impact on MNES, the taking of that action would contravene Part 3 of the EPBC Act. This creates material legal risk and undermines the objects of that Act. It seems to be in the Proponent's interests to refer this for EPBC Act assessment and include the Project into the broader bilateral EIS assessment process rather than progress this as a component of a staged project.

On 28 October 2025, the Proponent also made an application to have this Project designated as a Coordinated Project under the *State Development and Public Works Act 1971 (SDPWO Act)*⁵. This was endorsed with the gazettal of the 'coordinated project' declaration published on 24 November 2025.⁶ The Initial Advice Statement includes this Project area, and the Coordinator General's office is currently preparing draft terms of reference for an EIS⁷ will include this Project.

The Proponent presents this Project to Department of Environment, Tourism Science and Innovation (**DETSI**) as separate to the broader CND project, but the Project has been incorporated into the coordinated project assessment for the CND.

³ [e2m consulting \(January 2026\) Appendix C. Centurion Extension Project –Assessment of Matters of State Environmental Significance for the Centurion Coal Mine](#)

⁴ [e2m consulting \(January 2026\) Centurion Extension Project –Assessment of Matters of State Environmental Significance for the Centurion Coal Mine](#)

⁵ [Centurion Coal Mining \(28 October 2025\) Application and Initial Advice Statement for assessment of Centurion North Development as a Coordinated Project under the SDPWO Act](#)

⁶ [Queensland Government Gazette \(24 November 2025\) Declaration of a coordinated project.](#)

⁷ [Office of the Coordinator General. Centurion North Development project.](#)

The Project is:

- part of a larger action (as confirmed in the Proponent’s application), and
- it has not been referred for assessment under the EPBC Act as a component of the CND project – despite the identified impacts on MNES.

Sections 143 and 228 of the EP Act describe the circumstances under which a resource activity must, or may be, assessed by EIS. The EP Act requires that the standard criteria must be considered when making this decision about whether to require an EIS. The criteria for environmental impact statements for resource projects under the *Environmental Protection Act 1994* Guideline⁸ seeks to provide assistance to the decision makers in discharging that duty.

The Guideline states that “Any application for a resource project that appears to be seeking to avoid an EIS through a staged development would be closely examined and, consistent with the standard criteria (Appendix A), an EIS may be required for the entire project, even though none of the individual stages would trigger an EIS by themselves.”

It is unclear as to why DETSI did not require an EIS assessment of this Project given its failure to meet the standard criteria and it is clearly a part of a staged development. It appears that the EIS triggers outlined in Appendix B of the Guideline has been used as the primary reason for not requiring an EIS, despite not meeting many of the standard criteria.

It is noted that section 2.1 of the guideline notes that an EIS cannot be required if the application relates to a coordinated project under the SDPWO Act. However, the EA amendment was submitted at least three weeks prior to the declaration of a coordinated project - it is unclear if this was the reason for the acceptance of a major amendment rather than requiring an EIS assessment.

We strongly recommend that DETSI:

1. uses its powers under s69 of the EPBC Act and refer this Project for assessment, and/or
2. recommends to the Proponent that an early EA amendment is not in the best interest of the environment, the decision-makers, the proponent and does not provide transparency to the public. Given the Project already forms part of the bilateral EIS already submitted as a coordinated project, that the Project is referred for EPBC Act assessment for inclusion in an EIS project for the whole CND proposal.

Significant impact on threatened species and communities

The broader CND development

The scale of habitat identified within the broader CND project area demonstrates that the site is ecologically significant at regional, State and national scales.

Along with a desktop survey, the Proponent conducted surveys in February and July 2024, and June 2025. From these surveys, the Proponent has identified numerous threatened species, communities and migratory species which will, or are likely, to be impacted by the Project (from Table 13 of the Assessment of Matters of National Significance for the Centurion Coal Mine⁹):

Threatened ecological communities (TEC)

- 493.61 ha of brigalow (*Acacia harpophylla* dominant and co-dominant),

⁸ [DETSI \(2025\) Guideline - Criteria for environmental impact statements for resource projects under the Environmental Protection Act 1994](#)

⁹ [e2m consulting \(11 December 2025\) Centurion Extension Project –Assessment of Matters of National Environmental Significance for the Centurion Coal Mine](#)

- 528.69 ha of natural grasslands of the Queensland Central Highlands and the northern Fitzroy Basin,
- 42.69 ha of semi-evergreen vine thickets of the Brigalow Belt (North and South), and Nandewar bioregions

Threatened species

- 3,384.72 ha of squatter pigeon habitat (*Geophaps scripta scripta*: vulnerable),
- 3,384.72 ha of koala habitat (*Phascolarctos cinereus*: endangered),
- 54.63 ha of ornamental snake habitat (*Denisonia maculata*: vulnerable),
- 1,163.35 ha of king bluegrass (*Dichanthium queenslandicum*: endangered),
- 76.24 ha of painted snipe habitat (*Rostratula australis*: endangered),
- 76.24 ha of Latham’s snipe habitat (*Gallinago hardwickii*: vulnerable), and
- 3,398.89 ha of white-throated needletail habitat (*Hirundapus caudacutus*: vulnerable and migratory).

Migratory species

- 3,398.89 ha of fork-tailed swift habitat (*Apus pacificus*)
- 76.24 ha of glossy ibis habitat (*Plegadis falcinellus*); and
- 3,398.89 ha of oriental cuckoo habitat (*Cuculus optatus*).

These habitat extents are substantial and indicate that the CND project area is not marginal or degraded land but contains nationally significant biodiversity values.

The Project area

The project area for the entire Centurion North Development is 4,568 ha – despite this, the Proponent has applied for a smaller area to provide for the commencement of the CNP project.

The Terrestrial Ecological Assessment report¹⁰ is challenging to interpret as it presents a combination of the broader CND project and sometimes just for the disturbance footprint for the smaller project.

Within the Project disturbance area subject to this major EA amendment, there will direct impacts on:

- threatened regional ecosystems (Table 11),
- matters of State Environmental Significance (Table 12), and
- Environmentally Sensitive Areas.

Further indirect impacts will result from:

- fragmentation of habitat and connectivity,
- habitat degradation and edge effects,
- increased risk of fire,
- Spread of weeds and pest fauna species,
- Erosion, sedimentation and spills,
- Noise, dust and lights,
- Modification of surface hydrology, and
- Impacts to ground water.

¹⁰ [e2m consulting \(23 January 2026\) Appendix C: Centurion Extension Project –Assessment of Matters of State Environmental Significance for the Centurion Coal Mine](#)

EnvA again submits that significant impacts on threatened species and communities must be considered for the entire CND project. Assessment of a subsection of a project is inappropriate where there is a possibility that the larger project may be refused or be conditioned to make the larger project unviable. This leaves the risk of approving what may become stranded assets with a permanent disturbance and/or loss of habitat for no benefit for any stakeholder.

EnvA further notes that the precautionary principle – standard criteria (a)(i) requires that “where there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation”.

Cumulative impacts

The Proponent acknowledges that the impacts on the environment impacts is additive to past and present agricultural and mining activities but considers that these impacts on threatened species are minimal because of the localised nature of the project and the wider distribution of the species and habitats in the surrounding landscape.

The Suttor Catchment has already lost approximately 30% of its pre-clearing vegetation cover and the Isaac River catchment has lost nearly half of pre-clearing vegetation cover¹¹. Any further loss or disturbance to the remaining habitat is likely to cause significant additional impacts on threatened species and ecosystems.

Given this context, every hectare of remaining threatened species habitat is critical to protect. Dismissing further loss of threatened species and communities as “not significant” ignores clear ecological evidence and the precautionary principle.

Offsets

The Proponent acknowledges that offsets are likely to be required for regulated vegetation and koala habitat but downplays the impacts on numerous other MSES (Section 9 of the terrestrial ecology report)¹⁰, including king blue grass, squatter pigeons, the Australian painted and Latham’s snipe, ornamental snakes, white throated needletail and the short beaked echidna (Table 12)¹⁰.

The Proponent’s preferred offset mechanism is through a financial offset as the offset required for the regulated vegetation and koala habitat would be in the order of 285.64ha which would be ‘administratively challenging’ and less practical compared to the reliance on a financial settlement offset in lieu of like-for-like ecological restoration concept.

EnvA holds serious concerns about the general ineffectiveness of biodiversity offsets in Australia. Even the Federal Environment Minister stated that “We know the current offset arrangements are broken and making nature worse.”¹²

Since the Queensland Environmental Offsets Policy was introduced in 2014, biodiversity indicators— including vegetation extent and condition, and populations of threatened species— have continued to decline across the state.¹³ Further to this, there is a lack of suitable land for offsetting the impacts of development¹⁴, particularly in the Brigalow Belt bioregion which has been, and continues to be, extensively cleared for agriculture and coal mines¹⁵.

It is essential that the avoidance of impact—not offsetting—remains the priority.

¹¹ [Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. \(2023\). Remnant Regional Ecosystem Vegetation in Queensland \(Version 13.0\), Analysis 1997-2021. Queensland Department of Environment and Science: Brisbane.](#)

¹² [The Guardian \(2024\) A third of land set aside for restoration in worse state than before, Australian offset audit finds.](#)

¹³ [Queensland Government \(2024\). State of the Environment Report](#)

¹⁴ [Queensland Government. In-demand offsets](#)

¹⁵ [Accad, A. Kelley, J.A.R., Richter, D., Li, J., Neldner, V.J. and Ryan T.S. \(2023\). Remnant Regional Ecosystem Vegetation](#)

EnvA strongly recommends that this Project be refused, and that the Proponent is required to incorporate this proposal into the potential bilateral EIS assessment process to:

- Avoid breaches of the EPBC Act,
- Prevent a staged approval process,
- Allow a full assessment of the project's impacts,
- Provide a proposal for a meaningful offset that will provide additional habitat for threatened species and communities, and
- Reduce the likelihood of stranded and unrehabilitated assets.

Water Resources

The absence of Project-specific groundwater modelling and detailed impact assessment information is inconsistent with the precautionary principle (standard criteria (a)(i)), which requires that lack of full scientific certainty not be used to postpone measures to prevent environmental degradation.

The CND project is located within the Suttor and Isaac River sub-basins within the Fitzroy Basin and Burdekin Basin catchments. The north-western portion of the Study Area flows into the Belyando and Suttor River catchments, and the south-eastern portion of the Study Area flows south into the Isaac and Connors River catchments. Western flowing waterways within the Project area include Kennedy Creek and Charlie Creek and southern flowing waterways within the Project area include Goonyella Creek and Skull Creek.

The Proponent acknowledges that the Project has the potential to impact ephemeral waterways, including disruption of natural flow patterns through clearing, grading and infrastructure development. In addition, the Proponent notes that the Project may also degrade water quality through increased sedimentation and water discharges from the mine's operation.¹

Likewise, the Proponent has indicated that there are likely to be impacts to groundwater resources through, drilling, dewatering and subsidence and fracturing associated with longwall mining.

Again, the Supporting Information¹⁶ and Groundwater Assessment¹⁷ is challenging to interpret as it presents a combination of the broader CND project and sometimes just for the disturbance footprint for the smaller project. The Groundwater report identifies that this Project will provide further information to facilitate technical understanding to allow further information gathering to support specific assessments of the potential impacts on surface and ground water resources for the CND development.

There is insufficient modelling and assessments to provide Project-specific modelling and no detailed impact assessment information for this Project is provided.

This detailed monitoring and reporting is required prior to making substantive comment on the impacts of the Project on water resources, but we do emphasise that any impacts have the potential to impact on groundwater dependent ecosystems and may also have adverse impacts on the Great Barrier Reef – particularly when the cumulative impacts of coal mines are considered.

EnvA again recommends that the precautionary principle is a firm reason for this Project to be refused as there is insufficient information provided to adequately assess the impacts on water resources from the Project. EnvA further considers that the impacts of the Project would be inconsistent with the standard criteria principles of:

- intergenerational equity (standard criteria a(ii)) due to the potential permanent impact on

¹⁶ [SLR \(Jan 2026\) Centurion North Extension Project – Supporting Information](#)

¹⁷ [SLR \(Jan 2026\) Appendix A. Centurion North Extension Project – Groundwater Assessment](#)

water quality and availability,

- Commonwealth and State Plans (standard criteria b) due to the potential impacts on the Great Barrier Reef through impacts on water quality and GHG emissions,
- Adversely affect the character, resilience and value of the receiving environment (standard criteria e),
- Contrary to the public interest (standard criteria i), and
- It is not compatible with human rights.

Standard criteria (f) – all submissions made by the applicant and submitters is also relevant.

Greenhouse Gas (GHG) emissions

Emission estimates

The Proponent has presented Scope 1 and 2 GHG emission estimates for the first six years of the project, but not for the 28 year life of the mine (Table 4.2).¹⁸ This makes it challenging to interpret the contribution to GHG emissions to climate impacts or assess the contribution to meeting the State and Commonwealth legislated GHG emission reduction targets over the life of the project.

The Proponent identifies that scope 1 emissions will be emitted through:

- consumed diesel fuel in the construction and operation phases of the project, and
- fugitive emissions from the flaring of CSG and venting of CSG.

The estimate for the first six years will be approximately 1.25 Mt CO₂-e of scope 1 emissions.

Scope 2 emissions will result from the consumption of purchased electricity and is estimated to be approximately 21.900 t CO₂-e over the first six years. This appears to conflict with the statement in section 4.1.1 of the GHG abatement plan which states that “Scope 2 emissions are not applicable as the Project electricity requirements will be locally generated using diesel generators and not consumed from the national grid.”

Scope 3 emissions have not been estimated. as the Proponent claims that the Project will not produce a product. The assertion that the Project will not produce a product is inconsistent with the proposal to extract between 1 and 2 million tonnes of coal. Downstream combustion emissions are a foreseeable consequence of coal extraction and must be considered as Scope 3 emissions.

The presentation of emissions data for only the first six years of a 28-year project is inconsistent with DETSI’s Greenhouse Gas Emissions guideline and prevents a proper assessment of the Project’s contribution to cumulative emissions over its operational life.

EnvA strongly suggests that the application contains inaccurate and incomplete information, and the Proponent must be required to provide detail for the whole life-of-mine project.

GHG abatement plan

There are no meaningful GHG abatement or mitigation measures provided in the GHG abatement Plan for the Project. The Proponent only proposes to:

- adopt an emission reference for the broader Centurion Mine,
- meet the Safeguard Mechanism reduction targets, largely through the purchase of ACCUs,
- direct gas to candle stick flares to minimise free-venting, and
- produce annual reports in compliance with the *National Greenhouse and Energy Reporting Act 2007*.

¹⁸ [DETSI \(2026\) Guideline - Greenhouse gas emissions](#)

Reliance on Australian Carbon Credit Units (ACCUs) in lieu of direct emissions reduction does not reduce gross emissions from the Project and shifts mitigation burdens elsewhere.

Climate context

The Project is inconsistent with standard criteria (b), which requires consideration of relevant State and Commonwealth plans and agreements, including legislated emissions reduction targets and international commitments such as the Paris Agreement.

The scientific consensus is unequivocal: expansion of fossil fuel production is incompatible with limiting global warming to safe levels.¹⁹ Australia, alongside 196 other nations, is a signatory to the Paris Agreement²⁰, which commits countries to pursue efforts to limit warming to 1.5°C and well below 2°C.²¹ Meeting these targets requires the rapid phase-out and non-expansion of fossil fuel developments.

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. Even metallurgical coal must be phased out rapidly to remain within carbon budgets compatible with 1.5°C or 2°C pathways.²²

It is also contrary to standard criteria (b) as it is contrary to many State or Commonwealth plans, standards and agreements including (but not limited to):

- The Paris Agreement,²¹
- Legislated emission reduction targets²³ and interim targets²⁴,
- Belem Declaration on the Transition away from fossil fuels²⁵, and the
- Global Methane Pledge.²⁶

The continued accumulation of GHGs 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,
- Repeated mass coral bleaching events on the Great Barrier Reef,
- Intensified drought conditions, and
- A decrease in the conservation status of threatened species and ecosystems.

Progressive rehabilitation and closure plan

EnvA considers that the proposed progressive rehabilitation and closure plan (PRCP)²⁷ should be rejected and integrated into a PRCP that considers the whole CND project rather than just for the proposed disturbance for this Project.

¹⁹ [Intergovernmental Panel on Climate Change, *Climate Change 2022*](#)

²⁰ [United Nations – climate change The Paris Agreement](#)

²¹ [UN Framework Convention on Climate Change, Adoption of the Paris Agreement, 21st Conference of the Parties, Paris \(2015\)](#)

²² [International Energy Agency \(2024\). World Energy Outlook 2024](#)

²³ [Climate Change Act 2022](#)

²⁴ [Australian Government \(2025\) Setting our 2035 target and path to net zero](#)

²⁵ [Australia joins Belém Declaration to transition from fossil fuels](#)

²⁶ [Global Methane Pledge](#)

²⁷ [Peabody \(2026\) Centurion North Progressive Rehabilitation and Closure Plan](#)

EnvA notes that section 2.1.3 of the PRCP or the identifies this Project as a greenfield project, which appears to contradict the concept of an amendment to an existing EA. While the Proponent acknowledges that exploration activities have been occurring since the 2010 by BHP Mitsui Coal Pty Limited (the previous EA holder) and exploration activities dating back to the 1970's.

This raises serious concerns as to the prospects of establishing a viable coal mine given that previous exploration has not identified the resources as an economic priority. However, the Proponent is planning to continue exploration activities and commence early works for the broader CND project.

PRC plans are still required to meet the legislative requirements in section 126C(1)(c) of the EP Act. All proposed PRC plans must contain a community consultation plan regardless of whether the site has an existing EA. The Proponent has identified key stakeholders identified over 15 years ago during the Wards Well development and notes that this register will need to be updated for future consultation activities.

There are now numerous stakeholders that are concerned about the continued loss of habitat, the lack of rehabilitation of disturbed land, and impacts on adjacent and nearby land uses – groups such as EnvA are not currently identified as stakeholders, despite our significant interest in the protection and management of threatened species habitat and ecological communities in Central Queensland.

EnvA considers that the Proponent has not appropriately consulted with stakeholders and is reliant on comments associated with this proposed amendment to their current PRCP plan (P-PRCP-100669070_V4).

The nominated post mining land use (PMLU) is cattle grazing. This in no way attempts to re-establish the proposed loss of habitat for threatened species and communities, despite the acknowledgement of these impacts in the the Assessment of Matters of Sate Environmental significance report¹⁰. This rehabilitation plan will not replace the habitat loss of endangered and of concern regional ecosystems (Table 11)¹⁰ or the habitat of threatened plant and animal species including king blue grass, the koala, squatter pigeon, white-throated needletail and the echidna (Table 12).¹⁰

The Proponent plans to replace the existing habitat with grassland to support cattle grazing, including establishing introduced grasses which will increase the risk of future fires in the locality. EnvA considers that the Proponent must be required to revegetate using the suggested conservation significant flora species listed in Table RM5b rather than the proposed pasture mix.

Human rights

Approval of the Project would limit multiple human rights protected under the *Human Rights Act 2019 (Qld)* (HR Act), including:

- Right to life (s 16)
- Cultural rights of First Nations peoples (s 28)
- Rights of children (s 26)
- Right to property (s 24)
- Right to privacy and home (s 25(a))
- Right to equality and non-discrimination (s 15(2)).

The decision-maker, as a public entity under s9 of the Human Rights Act 2019 (Qld), must give proper consideration to relevant human rights in accordance with s58 of that Act.

The Queensland Land Court has recognised that activities involving increased GHG emissions

engage and potentially limit protected human rights, particularly where those emissions contribute to foreseeable climate harms²⁸. Human rights must be interpreted broadly and purposively, consistent with the protective intent of the HR Act, before any assessment is made as to whether a limitation is demonstrably justified under s 13.

The approval of a project that materially increases GHG emissions contributes to climate change impacts that are now well-documented, foreseeable, and increasingly severe. These impacts directly and indirectly threaten:

- The right to life, through increased frequency and intensity of heatwaves, bushfires, floods, and severe storms;
- Children’s rights, as younger and future generations will bear a disproportionate burden of climate harms over their lifetime;
- Cultural rights of First Nations peoples, whose connection to Country depends on the protection of land, waters, biodiversity, and ecological integrity;
- Rights to property and home, through climate-related damage, displacement, and escalating insurance costs; and
- Equality rights, given that climate impacts disproportionately affect vulnerable and regional communities.

The risks to these rights must be weighed against any projected economic benefits of the Project. Where those benefits are contingent upon activities that exacerbate the climate crisis and contribute to biodiversity loss — including impacts on threatened species, ecological communities, and natural assets that underpin regional economies — the justification for limiting human rights becomes increasingly difficult to sustain.

Rising global temperatures and the increasing frequency of extreme weather events threaten long-term social and economic stability. Communities in Queensland are already experiencing intensified heatwaves, flooding events, and climate-related disasters. These impacts are projected to worsen, creating intergenerational inequity as future generations inherit heightened risks, diminished natural assets, and escalating adaptation costs.

The health consequences of a warming climate are well established. Increased heat stress, the spread of vector-borne diseases, mental health impacts following disasters, and injury or loss of life from extreme events directly engage the right to life and children’s rights under the HR Act.

Climate change also imposes significant and compounding economic burdens. Insurance premiums have risen markedly in response to increased climate-related claims, and there is a growing risk that insurance will become unaffordable or unavailable in high-risk areas. Construction and infrastructure costs are increasing as climate resilience measures become necessary. Tourism and other industries reliant on environmental assets face decline as ecosystems are degraded, including coral reef systems affected by bleaching and cumulative climate impacts.

In these circumstances, approval of the Project would represent a limitation on protected human rights that is neither minor nor speculative. Given the well-established and escalating nature of climate harms, the decision-maker must rigorously assess whether any such limitation can be demonstrably justified in a free and democratic society based on human dignity, equality and freedom, as required by s 13 of the HR Act.

²⁸ [Human Rights Law Centre \(2022\) Landmark recognition of human rights and environmental impacts as grounds for a recommendation against the grant of a mining lease](#)

For the reasons outlined above, the application fails to satisfy the standard criteria under s191 of the EP Act. Approval would create material legal risk under the EPBC Act, undermine the integrity of the coordinated project EIS process, permit significant impacts on threatened species and water resources without adequate assessment, and contribute to cumulative greenhouse gas emissions inconsistent with State and Commonwealth commitments.

EnvA strongly recommends that the proposed EA amendment and PRCP amendment should be refused and the project incorporated into the broader CND project.

Thank you again for the opportunity to make comments on the Centurion North Development major amendment to P-EA-100658735.

Yours sincerely,



Dr Coral Rowston

Director

Environmental Advocacy in Central Queensland