



Hon Murray Watt MP  
Minister for the Environment and Water  
c/- Department of Climate Change, Energy, the Environment and Water

Submitted via the EPBC portal

25 February 2026

Dear Minister,

**RE: Submission on Referral – Centurion North Development (EPBC 2026/10419)**

Thank you for the opportunity to make this submission in response to the referral of the Centurion North Development (**Project**) by Centurion Coal Mining Pty Ltd, a subsidiary of Peabody Energy Australia Pty Ltd (**Proponent**), under the *Environment Protection and Biodiversity Conservation Act 1999* (**EPBC Act**).

**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 has participated in numerous Commonwealth and State environmental assessment processes and has a particular interest in ensuring that Matters of National Environmental Significance (**MNES**) are protected in accordance with the objects of the EPBC Act, including the principles of ecologically sustainable development.

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**

The Proponent is proposing to develop an underground longwall coal mine operation with associated coal seam gas extraction.

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



The proposed project, if approved, will,

- Expand the Centurion coal mine disturbance footprint by approximately 633 ha,
- Develop an underground longwall coal mine operation with associated coal seam gas (CSG) extraction,
- Construct up to 260 well pads to support vertical and lateral wells,
- Drill up to 150 wells,
- Develop up to 24 longwall panels with associated ventilation shafts, surface goaf management, and gas draining riser bores,
- Construction of a gas pipeline network to transport gas off site, and gas drainage riser bores,
- Installation of electrical reticulation including an extended high voltage line and substation, access tracks other facilities to support the operation.<sup>1</sup>

It is expected that each of the wells will produce CSG for up to 10 years at a maximum site-wide extraction of up to 10 petajoules per annum.

ROM coal extraction is expected to be produced at up to 7.1 million tonnes per annum over 26 years resulting in the extraction of up to 148 million tonnes over the life of the Project.

The scale, duration and intensity of this development make it a major fossil fuel expansion project with nationally and internationally significant environmental consequences.

## ENVA'S SUBMISSION

1. EnvA recommends that the Minister decides that this project will have **clearly unacceptable impacts on protected matters**, most notably the direct impact on:
  - (a) Listed threatened species and communities (ss 18 and 18A),
  - (b) Listed migratory species (ss 20 and 20A), and
  - (c) Water resources (ss 24D and 24E).
2. In the alternative, EnvA recommends that this Project is confirmed as a controlled action due to significant residual impacts on the Matters of National Environmental Significance (**MNES**) listed above.
3. That the Project is assessed in its entirety and incorporates the exploration and preparation works currently subject to State Government approval under the proposed major amendment to Environmental Authority (**EA**) P-EA-100658735.
4. That consideration is given to the inclusion of the off-lease infrastructure in this assessment.
5. Due to the potential significant impacts on water resources and the increased greenhouse gas emissions, both which will further impact on the environment and MNES, EnvA further recommends that the following controlling provisions are applied to this Project:
  - (a) World Heritage (ss 12 and 15A),
  - (b) Commonwealth marine areas (ss 23 and 24A), and
  - (c) Great Barrier Reef Marine Park (ss 24B and 24C).

Further background to our submission is provided below.

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<sup>1</sup> [Centurion Coal Mining Pty Ltd \(2026\) Referral application](#)

## GROUNDS FOR SUBMISSION

### General

EnvA notes that the Proponent has already stated that this is Project will be a controlled action with potential significant impacts to:

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

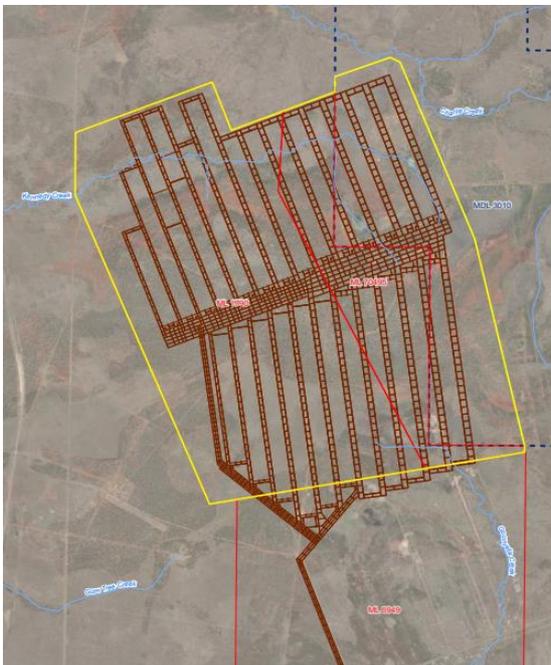
The Proponent made an application to have this Project designated as a Coordinated Project under the *State Development and Public Works Act 1971 (SDPWO Act)* on 28 October 2025<sup>2</sup>. This was endorsed with the gazettal of the 'coordinated project' declaration published on 24 November 2025.<sup>3</sup>

The Coordinator General's office is currently preparing draft terms of reference for an EIS<sup>4</sup> for the Project and the Queensland Government has announced the outcome in a media statement.<sup>5</sup>

EnvA is concerned that this referral has already been determined between the State and Federal governments, and hence the comments provided below are limited to the fundamental concerns in relation to the assessment report and the Proponent's conclusions on the significance of the impacts on MNES.

### Project area and scope

The Proponent identifies the project area as approximately 4,568ha with a disturbance footprint of approximately 633ha. This disturbance footprint appears to be an underestimate of the total impact of the complete project, particularly if edge effects and fragmentation impacts are considered as part of the disturbance footprint.



Reproduction of figure 4 presented with the Project referral application

<sup>2</sup> [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](#)

<sup>3</sup> [Queensland Government Gazette \(24 November 2025\) Declaration of a coordinated project.](#)

<sup>4</sup> [Office of the Coordinator General. Centurion North Development project.](#)

<sup>5</sup> [Queensland Government \(24 November 2025\) Major Central Queensland Coal Mine Extension Declared Coordinated Project](#)

The Proponent’s referral application excludes activities authorised under Environmental Authority (EA) P-EA-100658735, proposed amendments to this EA, pre-existing infrastructure or any new off-lease infrastructure required to transport and commercialise gas (which will be the responsibility of a third party).

As far as EnvA can ascertain, the previously approved EA and the proposed major amendments to the EA have never 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 report<sup>6</sup> submitted in support of the EA amendment application summarises the impacts on some of the MNES listed species within the approximately 167.4 ha disturbance footprint:

Table 12: MSES fauna and flora habitat impacted by the Disturbance Footprint

MSES	Likelihood to occur	VM Act/ NC Act status	EPBC Act status	Extent within the Disturbance Footprint (ha)					
				Known (ha)		Potential (ha)	Total (ha)		
Protected wildlife habitat - Flora				Known (ha)		Potential (ha)	Total (ha)		
King bluegrass ( <i>Dichanthium queenslandicum</i> )	Known	V	E			8.20	8.20		
Protected wildlife habitat - Fauna				Breeding & foraging (ha)	Foraging (only) (ha)	Foraging and roosting (ha)	Foraging and dispersal (ha)	Dispersal (ha)	Total (ha)
Koala ( <i>Phascolarctos cinereus</i> )	Known	E	E	64.83	-	-	-	3.55	68.38
Squatter pigeon (southern) ( <i>Geophaps scripta scripta</i> )	Known	V	V	0.11	69.78	-	-	1.40	71.30
Australian painted snipe ( <i>Rostratula australis</i> )	Likely	E	E	-	-	5.28	-	-	5.28
Latham’s snipe ( <i>Gallinago hardwickii</i> )	Likely	V	V	-	-	5.28	-	-	5.28
Ornamental snake ( <i>Denisonia maculata</i> )	Likely	V	V	5.28	-	-	-	-	5.28
White-throated needletail ( <i>Hirundapus caudacutus</i> )	Likely	V	V	-	-	-	68.38	-	68.38
Short-beaked echidna ( <i>Tachyglossus aculeatus</i> )	Known	SLC	N/A	68.38	-	-	-	9.38	77.76

There are also likely to be significant impacts on water resources from the proposed exploratory and preparation works.

It appears that this Project is part of a larger action, with some components of the Project clearly not having been referred for assessment under the EPBC Act – despite the identified impacts on MNES. Section 74A and the Department’s Split Referral Policy make clear that an action must not be divided to avoid assessment of its full impacts.<sup>7</sup>

EnvA considers that the Minister should use his powers under section 70 of the EPBC Act to require the Proponent to refer the exploration and preparation works currently under assessment for a major EA amendment for EPBC assessment. Failure to assess the entire action risks undermining the objects of the EPBC Act and may result in unlawful commencement contrary to s68.

### Significant impact on threatened species and communities

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

<sup>6</sup> [e2m consulting \(January 2026\) Centurion Extension Project –Assessment of Matters of State Environmental Significance for the Centurion Coal Mine](#)

<sup>7</sup> [Australian Government. Policy Statement: Staged developments – Split referrals: Section 74A of the EPBC Act.](#)

The Project will have a significant adverse impact on numerous threatened species, ecological communities and migratory species listed under the EPBC Act. The project area for the entire Centurion North Development is 4,568 ha – despite the proponent excluding nearly 4000 ha from this Project referral.

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 MNES 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 Mine<sup>8</sup>):

#### Threatened ecological communities (TEC)

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

#### **Significant impact on migratory species**

##### 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 Project area is not marginal or degraded land but contains nationally significant biodiversity values.

The Proponent concedes that there will be significant residual impacts on

- Brigalow (*Acacia harpophylla* dominant and co-dominant) TEC,
- Natural Grasslands of the Queensland Central Highlands and the northern Fitzroy Basin TEC,
- king bluegrass,
- koala,
- Australian painted snipe, and
- ornamental snake.

EnvA submits that significant residual impacts are likely for all listed TECs, threatened species and migratory species identified above, particularly when indirect impacts such as fragmentation, edge effects, hydrological change, subsidence and climate change are properly considered.

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<sup>8</sup> [e2m consulting \(11 December 2025\) Centurion Extension Project –Assessment of Matters of National Environmental Significance for the Centurion Coal Mine](#)

The precautionary principle under s 3A(b) of the EPBC Act requires that lack of full scientific certainty must not be used as a reason to postpone measures to prevent environmental degradation.

EnvA also notes large areas of the proposed Project is mapped as essential habitat or a high-risk area on the flora trigger map (Figure 4 of the MNES assessment report)<sup>8</sup>. Further to this, the northern section of the Project area also intersects with a buffer area of a terrestrial State-wide biodiversity protection corridor (Figure 5 of the MSES assessment report)<sup>6</sup> which also contains endangered and of concern remnant vegetation (Figure 6 of the MSES assessment report)<sup>6</sup>.

This supports our assertion that the habitat values of the site are significant and require protection.

EnvA recommends that this Project be refused due the clearly unacceptable impacts on listed threatened species and communities and listed migratory species. In the alternative, the Proponent must be required to provide a more compelling argument as to how the Project will not result in a significant residual impact on the additional species and communities identified as occurring in the Project area either directly or indirectly through fragmentation, reduction in connectivity and the additional emissions leading to accelerated climate change.

## **Water Resources**

The Project is located 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.<sup>1</sup>

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.

Specific assessments of the potential impacts on surface and ground water resources are yet to be conducted to provide project-specific modelling and detailed impact assessment information.

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.

## **Greenhouse Gas (GHG) emissions**

### Scope 1 and 2 emissions

The Proponent has presented GHG emission estimates based on a “base case” and a “fully mitigated case”, divided over three time frames commensurate with the abatement strategy implementation, the steady-state years and the declining years of the Project (Table 3)<sup>9</sup>.

EnvA found this table and the estimates difficult to interpret but note that the total scope 1 and 2 emissions over the life of the project is estimated to be **16.3 megatonnes** of CO<sub>2</sub>-e over 26 years (refer to note 2 in the replicated table below).

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<sup>9</sup> [Attachment G. Centurion North Development – Greenhouse Gas Estimates \(2 February 2026\)](#)

It is unclear how this figure was calculated from the information provided, but it casts doubts over the accuracy of the GHG estimates presented – despite this report being resubmitted and the public consultation time frame extended.

**Table 3: Summary of the Average GHG Emission Estimates (Scope 1 and Scope 2)**

Scope	Base Case (CO <sub>2</sub> -e, t)			Fully Mitigated <sup>(1)</sup> (CO <sub>2</sub> -e,t)		
	1	2	Total (CND)	1	2	Total (CND)
CY2029 - CY2034	1,286,122	64,082	1,350,204	854,846	63,540	918,386
CY2035 - CY2049	1,200,624	61,898	1,262,522	471,503	59,362	530,865
CY2050- CY2055	902,255	51,684	953,939	397,888	44,917	442,806
CY2029-CY2055 (LoP)	1,153,319	60,113	1,213,433	540,331	57,081	597,412
<b>Total (Life of Project) CO<sub>2</sub>-e, Mt<sup>(2)</sup></b>						<b>16.13</b>
<i>Note: (1) Mitigation measures are fully implemented by CY2035            (2) The total over the life of the Project (LoP) is reported in megatonnes of CO<sub>2</sub>-e</i>						

### Scope 3 emissions

Table 4 of the GHG estimate report<sup>9</sup> estimates that over the life of the project, scope 3 emissions include:

- 6.9 megatonnes of CO<sub>2</sub>-e within Australia, and
- 320.9 megatonnes of CO<sub>2</sub>-e outside of Australia.

### Total emissions

The estimates the total of scope 1, scope 2 and scope 3 emissions are presented in Table 5 as:

- 23.1 megatonnes of CO<sub>2</sub>-e within Australia, and
- 344 megatonnes of CO<sub>2</sub>-e outside of Australia.

These estimates are extraordinarily high and far exceed Australia’s total annual emissions reported in the year to June 2025 of 437.5 million tonnes of CO<sub>2</sub>-e.<sup>10</sup>

### GHG abatement plan

The Proponent operates six mines subject to the Australian Safeguard Mechanism and has set an emission reduction target of 20% reduction in Scope 1 and 2 emissions, from a 2023 baseline, by 2030. Their success in reducing emissions between 2021 and 2024 is noted, however this success will be negated with the opening of new gas and expanded coal production.

The preliminary GHG abatement plan includes emission reduction measures such as:

- Capture and utilisation of CSG (operated by third parties) as a power source,
- Destruction of air methane from the underground mine when there is commercially viable technology, and
- Progressive replacement of diesel power generation with electrical power, and
- Flaring when CSG is unable to be beneficially used.

These measures, along with other suggestions in relation to monitoring, maintaining plant and equipment and operator training do not represent any meaningful GHG abatement. It appears that the Proponent will largely be reliant on the purchase of Australian Carbon Credit Units (**ACCUs**) to mitigate its emissions.

<sup>10</sup> [Queensland Government \(December 2025\) National Greenhouse Gas Inventory Quarterly Update: June 2025](#)

There is insufficient information required to assess if the project can meet the requirements of the Safeguard Mechanism and the proposed mitigation is heavily reliant on offsets rather than meaningful emission reduction.

EnvA submits that the Minister cannot reasonably approve this Project without being satisfied that it is compatible with the Safeguard Mechanism and Australia's legislated emissions reduction targets. If the Project cannot demonstrate compatibility with the Safeguard Mechanism, it will undermine Australia meeting commitments such as:

- The Paris Agreement<sup>11</sup>
- Legislated emission reduction targets<sup>12</sup> and interim targets<sup>13</sup>,
- Belem Declaration on the Transition away from fossil fuels<sup>14</sup>, and the
- Global Methane Pledge.<sup>15</sup>

Heavy reliance on ACCUs does not constitute genuine abatement and shifts mitigation burdens elsewhere rather than reducing gross emissions.

### Climate context

The scientific consensus is unequivocal: expansion of fossil fuel production is incompatible with limiting global warming to safe levels.<sup>16</sup> Australia, alongside 196 other nations, 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.<sup>17</sup> 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.<sup>18</sup>

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.

### **Great Barrier Reef**

The Great Barrier Reef is a World Heritage property under the EPBC Act and is already assessed as being in poor and deteriorating condition. Two of the greatest threats to the Great Barrier Reef (GBR) are climate change and declining water quality.

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<sup>11</sup> [The Paris Agreement](#)

<sup>12</sup> [Climate Change Act 2022](#)

<sup>13</sup> [Australian Government \(2025\) Setting our 2035 target and path to net zero](#)

<sup>14</sup> [Australia joins Belém Declaration to transition from fossil fuels](#)

<sup>15</sup> [Global Methane Pledge](#)

<sup>16</sup> [Intergovernmental Panel on Climate Change, Climate Change 2022](#)

<sup>17</sup> [UN Framework Convention on Climate Change, Adoption of the Paris Agreement, 21<sup>st</sup> Conference of the Parties, Paris \(2015\)](#)

<sup>18</sup> [International Energy Agency \(2024\). World Energy Outlook 2024](#)

The GHG emission estimate report is fundamentally flawed with no meaningful emission mitigation proposed, and detailed water reporting is yet to be provided.

The recent amendments to the EPBC Act remove the exemption for land clearing where the action involves:

- Clearing native vegetation within 50 metres of a watercourse, wetland or drainage line in the catchment of the Great Barrier Reef Marine Park.
- Clearing vegetation on land that has not been cleared at least 15 years prior to the time the action is taken (and the action is not a forestry operation).

While this does not mean there is a blanket ban on the clearing of regrowth vegetation of clearing within 50m of a watercourse, it does indicate that there may be significant impacts to the GBR from such activities. This Project will clear riparian vegetation, alter hydrological regimes and contribute additional pollutant loads within the GBR catchment, compounding cumulative impacts.

EnvA considers that this must be further addressed by the Proponent through the inclusion of controlling provisions:

- (a) World Heritage (ss 12 and 15A),
- (c) Commonwealth marine areas (ss 23 and 24A), and
- (d) Great Barrier Reef Marine Park (ss 24B and 24C).

There is a precedent in including these controlling provisions from the Blackwater North decision in relation to controlling actions. This Project presents a very strong case for the inclusion of these controlling provisions.<sup>19</sup>

EnvA reiterates its recommendations that the Minister:

1. Determine that the Project will have clearly unacceptable impacts on MNES and refuse approval under s 133 of the EPBC Act; or
2. At minimum, declare the Project a controlled action under all relevant controlling provisions and require assessment of the entire action, including exploration works and off-lease infrastructure.

Approval of this Project would be inconsistent with the objects of the EPBC Act, the principles of ecologically sustainable development, and Australia's international climate and biodiversity commitments.

Thank you again for the opportunity to make comments on the Centurion North Development referral for assessment under the EPBC Act.

Yours sincerely,



**Dr Coral Rowston**

Director

Environmental Advocacy in Central Queensland

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<sup>19</sup> [DCCEEW \(13 May 2024\) Statement of Reasons for a Decision on Controlled Action Under the Environment Protection and Biodiversity Conservation Act 1999](#)