



Australian Conservation Foundation

Submission to: Browse to North West Shelf Development (EPBC 2018/8319) –
Invitation for Public Comment on Reconsideration of Referral
Determination

Addressed to: Department of Climate Change, Energy, the Environment and
Water

Submission from: Australian Conservation Foundation

Level 1, 60 Leicester Street, Carlton VIC 3053.

Contact details: Piper Rollins, Climate and Energy Export Campaigner

piper.rollins@acf.org.au

Date: 21 July 2026



**AUSTRALIAN
CONSERVATION
FOUNDATION**

**Nature
needs us,
now**



About the Australian Conservation Foundation

The Australian Conservation Foundation is Australia's national environment organisation. Since 1965, we've protected the nature we all love – our unique wildlife and our beautiful beaches and bush.

Driven by the power of people, we won World Heritage listing for the Great Barrier Reef and Kakadu National Park, and returned precious water to the rivers of the Murray-Darling.

We influence governments and businesses to protect the animals, rivers and reefs close to our hearts and hold decision-makers to account without fear or favour. Everything we do is evidence-based and helps nature and people thrive for generations to come.

We won't give up until Australia's nature is protected and regenerated.

The Australian Conservation Foundation acknowledges that First Nations Peoples of Australia hold unique knowledge and rights inherited from their ancestors and Country and have cared for this country since time immemorial. We pay our respect to First Nations Peoples of Australia, past, present and future. We respect their leadership in caring for Country and support their rights to continue to do so. We recognise that sovereignty was never ceded, and that colonisation was unjust, often violent and continues to adversely impact on First Nations Peoples today. As Australia's national environment organisation, we understand we have a responsibility to help right this historical wrong. We support their authority to speak for Country, right to self-determination and recognise that rightful recognition of and genuine reconciliation with First Nations Peoples is fundamental to protecting nature in Australia. We support First Nations-led campaigns that protect Country and seek win-win outcomes for our environment and for the rights, wellbeing and advancement of First Nations Peoples.

To find out more about the Australian Conservation Foundation's work visit www.acf.org.au



**AUSTRALIAN
CONSERVATION
FOUNDATION**

**Nature
needs us,
now**



Public Comments on the Browse to North West Shelf Development (EPBC 2018/8319) – On Reconsideration of Referral Determination Public Comments on the Browse to North West Shelf Development (EPBC 2018/8319) – On Reconsideration of Referral Determination

1. The Australian Conservation Foundation (ACF) welcomes the opportunity to make a public comment on the request, pursuant to s 78A of the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act), to reconsider the decision of the Minister's delegate made under s 75(1) of that Act (the controlled action decision) for the Browse to North West Shelf Development (EPBC 2018/8319) (the Browse Gas Project). For the purposes of s 78B(6) this submission represents the comments of each signatory.
2. ACF is Australia's national environmental organization representing a community of more than 700,000 people who are committed to achieving a healthy environment for all Australians. For more than 50 years, ACF has been a strong advocate for Australia's forest, rivers, people and wildlife. ACF promotes awareness, lobbies government and is committed to taking advantage of any lawful right or privilege to raise awareness of environmental issues.
3. It is ACF's view, and the view of the ACF supporters who have co-signed this submission that there is substantial new information available to the Minister about the impacts of the Browse Gas Project on matters protected under Part 3 of the EPBC Act, namely, the World Heritage values of the Great Barrier Reef World Heritage property (ss 12 and 15A of the EPBC Act) and the Great Barrier Reef Marine Park (ss 24B and 24C of the EPBC Act). The substantial new information is set out in summary below and in full in the letter and materials provided to the Minister by ACF on 18 February 2026 requesting the reconsideration of the referral decision for the Browse Gas Project.
4. This substantial new information regarding the impacts of the Browse Gas Project on the Great Barrier Reef World Heritage property and Marine Park justifies the revocation and substitution of the original referral decision with a new controlled action decision that includes ss 24B and 24C and ss 12 and 15A of the EPBC Act as controlling provisions.
5. ACF does not consider that there has been a substantial change in circumstances that was not foreseen at the time of the first referral decision and does not rely on that provision of s 78 of the EPBC Act.



Greenhouse gas emissions from the Browse Gas Project will increase climate change-driven coral death on the Great Barrier Reef

6. On 18 February 2026, ACF – represented by Environmental Justice Australia - made a reconsideration request to the Minister for the Environment and Water on the basis of substantial new information which identified that the Browse Gas Project will impact on the environment in the Great Barrier Reef Marine Park and its protected values as a World Heritage property, matters which are protected under the EPBC Act.
7. This request included a report from Intergovernmental Panel on Climate Change (IPCC) Lead Author and Australian National University Professor Sarah Perkins-Kirkpatrick which demonstrated that the emissions from the Browse Gas Project are likely to have significant negative physical effects on the Great Barrier Reef and its protected values.
8. The scientific report prepared by Professor Perkins-Kirkpatrick confirmed that:
 - a. It is now scientifically possible to link GHG emissions from the Browse Gas Project (and other fossil fuel projects) with additional global warming and quantify the ecological and human impacts of that warming at global and regional scales;
 - b. The CO₂-only emissions of the Browse Gas Project are estimated to be a total of approximately 1.6 billion tonnes of climate pollution over the extended field life of the project;
 - c. The best estimate of additional global warming attributable to the emissions of the Browse Gas Project is 0.00072°C; and
 - d. The additional warming attributable to the Browse Gas Project is estimated to cause direct impacts on the Great Barrier Reef via the increased incremental thermal exposure in the reef. This additional heating is estimated **to increase coral mortality by around 29.35 million individual coral colonies in each future mass bleaching event.**
9. The request also connects Professor Perkins-Kirkpatrick's findings to the findings of the IPCC Sixth Assessment Report that increased frequency and intensity of marine heatwaves and corresponding mass coral bleaching events is virtually certain. In this context the Browse Gas Project's incremental and cumulative impact is significant and of consequence to the Great Barrier Reef.
10. The substantial new information about the impacts of the Browse Gas Project on the Great Barrier Reef justifies the revocation and substitution of the controlled action decision, to ensure that the federal environmental assessment process of the Browse Gas Project accounts for the climate change impacts that the Browse Gas Project will have on the Great Barrier Reef and its protected values.
11. Across ACF's community and supporters, there is strong support for the Minister to take into account this new scientific evidence to ensure that the EPBC Act operates effectively to accurately identify, assess and mitigate significant impacts on Australia's most iconic places and matters of national environmental significance.



The environmental and climate impacts of the Browse Gas Project are unacceptable

12. ACF submits that the environmental impacts of the Browse Gas Project as articulated within the boundaries of the current controlled action decision are unacceptable, and the Minister should reject the project in accordance with s 74B(1)(b) of the EPBC Act.
13. If the above reconsideration request is accepted, and a new controlled action decision that includes the Great Barrier Reef is made, ACF reiterates the above position that the environmental impacts of the Browse Gas Project would be unacceptable.
14. Woodside Energy Ltd varied the Browse Gas Project proposal in 2025, but ACF is of the view that those amendments were minor and do not address or ameliorate the unacceptable, unavoidable environmental impacts associated with the project including:
 - a. The continued risk of significant and irreversible subsidence impacts on Sandy Islet, Scott Reef and surrounding Commonwealth Marine Area habitats. The loss of Sandy Islet poses an existential threat to the long-term viability of the genetically distinct population of Green Turtles found at Scott Reef;
 - b. The continued risk of a major oil spill, which would have catastrophic impacts on benthic communities and habitat, marine environmental quality and marine fauna, including listed threatened and migratory species;
 - c. The impact of seismic blasting and other noise pollution on marine fauna, especially cetaceans such as the threatened Pygmy Blue Whale;
 - d. The ongoing harm and permanent deterioration of the Murujuga Cultural Landscape, by onsite acidic industrial pollution at the North West Shelf facility that cause the dissolution of the petroglyphs that constitute the Murujuga Cultural Landscape; and
 - e. The amendments and associated documentation do not address ongoing insufficient baseline data and information about the environmental factors at Scott Reef and the surrounding area, undermining the proper assessment of environmental impacts.
15. In addition to these environmental impacts on matters of national environmental significance, ACF emphasises that the Browse Gas Project, if allowed to proceed, would be a carbon bomb emitting around 1.6 billion tonnes of lifetime climate pollution. Those emissions, irrespective of the country of origin, contribute to the climate harms that are already impacting Australians and the nature we love in the form of worse climate disasters like bushfires, floods, cyclones and heatwaves. At least 85% of gas extracted from the Browse Gas Project will be exported overseas for corporate profit, with little real economic or social benefit for everyday Australians here at home.
16. In summary, ACF and our supporters urge the Minister to accept the reconsideration request, based on the substantial new information now available, to substitute the controlled action decision on the Browse Gas Project and include assessment of the climate consequences of the project on the Great Barrier Reef.
17. Australia's most iconic natural wonders, from Scott Reef to the Great Barrier Reef, are unacceptably threatened by Woodside's Browse Gas Project. It should be rejected.

