

Reply to: Georgina Woods  
PO Box 290  
Newcastle 2300

22 November 2018

**Submission: Hunter gas pipeline Modification 1**

We object to this modification.

That the proponent could expect to be granted a modification to extend its development consent based on the information provided speaks to its unfitness to undertake the environmental management of such an enormous and complex so-called “critical infrastructure.” This application appears to be hastily slapped together and the proponent has nothing but a website and a couple of media appearances to substantiate its argument that the consent should be extended.

To substantiate its claims that the extension of the lapse deadline is needed, the proponent provides little evidence. Two of the pieces of evidence provided are media articles. There is no explanation provided as to why, in the years since approval was granted, while the price of gas on the east coast has surged and supply tightened, the proponent has not made any move to secure finance or customers for its pipeline, done no survey work to identify the route the pipeline will take, nor any of the extensive additional environmental and other work required to commence construction.

The ten year old conditions of consent lump most of the required additional environmental studies into a “Construction Environmental Management Plan” The proponent provides a document titled “Construction readiness report,” which refers to itself as “this Construction Environmental Management Plan” and “this environmental management plan” indicating that the proponent considers that the construction readiness report is the CEMP referred to in the conditions. It appears to be a list of things that need to be done, rather than a plan that meets the conditions of the consent. The document appears hastily prepared and includes none of the new information specific to this pipeline as required by the development consent.

The section on Endangered Ecological Communities notes that such information needs to be current, but does not address the matter of the communities, species and populations that have been listed or had their listing changed in the last ten years or provide any current information. The report says that “Environmental and ecological systems are dynamic and consequently data collected on ecological systems and assemblages must be current at time of construction” but does not provide any of the “further ecological investigation” it admits is required.

The omissions from the materials provided are extensive:

- There is no mention made of the specific assessment of impacts on Koalas required by the conditions of consent, nor the new SEPP 44 “Koala habitat protection”
- There are no route alignment sheets demonstrating the avoidance of endangered ecological communities.

- There appears to be no progress on identifying what biodiversity offsets are needed, or how they will be obtained and managed, despite a biodiversity offset needs study being a condition of consent.
- There is no oral histories study or any outline of how or if the proponent intends to develop that study as required by the conditions of consent.
- There is none of the required information identifying “all sources of water for construction and operation” nor is there a justification of the water to be extracted and potential impacts to other users as required by the conditions of consent.
- Similarly, the report admits that “Negotiations associated with the easement and access to properties for studies and constructability assessments has been limited” and “specific negotiations with all landholders along the route will be undertaken leading to construction.” And again, there has been “limited negotiation” with the owners of mining and petroleum tenure holders and no negotiation at all with infrastructure owners.
- There is only passing mention made of the Gomerioi Native Title application, and headings without anything at all below them for “Oral History study” and “Cultural heritage.”
- There are no details provided of the water crossings, nor maps of soils, flooding or biodiversity along the route.

No mention is made of any gas companies that intend to use the pipeline. The only specific gas producer mentioned by the proponent is Santos, which it admits has not committed to use it. As evidence of the need for the project, the proponent provides a copy of AEMO’s 2018 Gas Statement of Opportunities, making the claim that the Hunter Gas pipeline is “required” by AEMO. This is not strictly accurate. The Queensland Hunter Gas Pipeline is identified as a *potential* contribution to increased flows. If exploration and new gas field developments in the north provide sufficient gas production to meet southern demand, this additional transport capacity could relieve constraints on the SWQP and MSP, and allow more flows to be diverted south.

The report concludes that “Planning for the construction of the QHGP is well advanced. Areas for increased activity include land holder consultation, development of transport management plans and negotiation and consultation with relevant native title owners. In other respects, QHGP is in an advanced state of preparedness to commence and undertake construction.”

Thank you for the opportunity to make this submission. We hope the Department refuses this modification.