

Ms Rose-Anne Hawkeswood
Acting Director, Resource Assessments
Department of Planning and Environment
C/o Major Projects Portal

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Secretary's Environmental Assessment Requirements–SSI-53307723 Narrabri Lateral Pipeline

Dear Ms Hawkeswood

Thank you for your correspondence of 12 January 2023 and the opportunity to provide comments on the draft SEARs for the Narrabri Lateral Pipeline.

NSW Department of Primary Industries (DPI) Agriculture collaborates with our stakeholders to protect and enhance the productive and sustainable use and resilience of agricultural resources and the environment.

NSW DPI Agriculture has reviewed the scoping report for the above proposal and considers the project may have significant impacts on agricultural land and land uses.

NSW DPI's concerns relate to the location of the pipeline on highly productive agricultural land, the potential impacts on agricultural resources and the use of the land for agriculture during operation of the pipeline and upon cessation of the development.

NSW DPI recommends the following specific inclusions should be required to be addressed in the Environmental Impact Statement (EIS):

1. An Agricultural Impact Statement (AIS) should be completed as part of the EIS. The AIS should:
 - Describe (including maps) the soil, slope, land capability, agricultural productivity, land characteristics and the history of agricultural production on agricultural land along the route of the proposed pipeline.
 - Detail the potential impacts from the proposed development on agricultural land and agricultural land uses, including agricultural support services, processing and value adding industries, along the route of the pipeline and the vicinity of land that will be directly impacted by the proposal.
 - Demonstrate how all significant impacts on agricultural land uses and resources will be reasonably avoided or adequately mitigated.
 - Detail the location and areas of land to be temporarily removed from agricultural use, and those areas which are to be returned to agricultural use during operation of the pipeline and after decommissioning. Identify and quantify the area of land to be permanently removed from agricultural as a result of the proposed pipeline.

- Confirm the outcomes of individual landholder consultation in relation the direct impacts of the proposed works including access and biosecurity issues.
 - Consider possible cumulative impacts on surrounding agricultural enterprises and landholders.
 - Outline any impacts to water use for agriculture and measures to mitigate against these impacts.
2. A Land Use Conflict Risk Assessment (LUCRA) should be undertaken to determine the potential for land use conflict between the pipeline (during construction and operation) and agricultural land uses along the route. The LUCRA should also detail mitigation measures and the revised risk once mitigation measures have been implemented.
3. A Biosecurity Management Plan (BMP) should be prepared as part of the EIS. The BMP should:
- Include an assessment of biosecurity (pests, weeds, and disease) risk to agricultural operations along the pipeline route, outlining the likely plant, animal, and community risks. Specifically, the BMP needs to address the biosecurity risks associated with the movement of plant and soil material between properties during construction.
 - Complement individual landholder biosecurity plans.
 - Include details of how the proposal will deal with identified biosecurity risks as well as contingency plans for any failures. Include monitoring and mitigation measures for weed and pest management.
4. A Rehabilitation and Decommissioning Management Plan should be prepared as part of the EIS and should:
- Describe how the land used for cropping or other agriculture prior to construction of the pipeline will be able to be used for cropping or other agriculture in the future when the pipeline is operational or has been decommissioned, along with the expected timeline for the rehabilitation program.
 - For land used for agriculture it is expected that the rehabilitation measures will include, but not be limited to, removal of all above ground infrastructure and any below ground infrastructure which is less than 1200mm deep and will be in accordance with State Environmental Planning Policy No 55 - Remediation of Land.
 - Outline the monitoring and mitigation measures to be adopted for rehabilitation remedial actions.
 - Be supported by a soil survey, undertaken prior to works commencing, as a benchmark for rehabilitation and where the land contains sodic soils detail the proposed management practices.

Primary industry guidelines and resource information (**Attachment A**) should also be provided to the proponent for their consideration when preparing the Environmental Impact Statement.

Should you require clarification on any of the information contained in this response, please do not hesitate to contact me on 0429 864 501 or by email at landuse.ag@dpi.nsw.gov.au .

Sincerely

A handwritten signature in black ink, appearing to read 'Paul Garnett', with a stylized flourish at the end.

Paul Garnett
Agricultural Land Use Planning Officer
Ag Strategic Initiatives
New England and North West Region

18 January 2023

Encl: Attachment A: Guidelines and resource information

Attachment A: Primary Industry guidelines and resource information

Title	Website link
Land Use Conflict Risk Assessment Guide	https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/lucra
Infrastructure Proposals on Rural Land	https://www.dpi.nsw.gov.au/agriculture/lup/development-assessment2/infrastructure-proposals
The land and soil capability assessment scheme: second approximation 2012 (OEH)	https://www.environment.nsw.gov.au/research-and-publications/publications-search/land-and-soil-capability-assessment-scheme
Biosecurity Risk Management in Land Use Planning and Development	https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0018/1271241/managing-biosecurity-risks-in-land-use-planning-and-development-guide.pdf
Landholder Biosecurity and Utility Service Providers - Primefact	https://www.dpi.nsw.gov.au/__data/assets/pdf_file/0020/1241732/PUB20-475-PrimeFact_Landholder-Biosecurity-and-Utility-Service-Providers.pdf
Australian Soil and Land Survey Handbook (CSIRO)	https://ebooks.publish.csiro.au/content/australian-soil-and-land-survey-field-handbook
Guidelines for Surveying Soil and Land Resources (CSIRO)	https://ebooks.publish.csiro.au/content/guidelines-surveying-soil-and-land-resources