



Country Women's Association of NSW

Incorporated in 1931 by an Act of NSW Parliament

ABN 82 318 909 926

Tuesday 16 December 2025

Attention: Brittany Golding
Contact Planner
NSW Planning Development and Assessment
State Significant Infrastructure (SSI-53307723)
Narrabri Lateral Pipeline (EPBC 2024/10050)

Re: Narrabri Lateral Pipeline (EPBC 2024/10050)

Introduction

The Country Women's Association of New South Wales (CWA of NSW) welcomes the opportunity to comment on the proposed Narrabri Lateral Pipeline (NLP). For more than a century, the CWA of NSW has advocated for the wellbeing, environmental security, and long-term sustainability of regional, rural and remote communities. Decisions affecting land, water, ecosystems, and community health in regional NSW must be grounded in robust, precautionary, and evidence-based assessment.

The Minister for the Environment has already determined that the Narrabri Lateral Pipeline is a Controlled Action under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) due to the risk of significant impacts on listed threatened species and ecological communities (Sections 18 & 18A). This places the burden squarely on the proponent to demonstrate that the project will not cause unacceptable environmental harm.

After reviewing the referral documentation and associated materials, the CWA of NSW is not satisfied that the proponent has met that requirement. The CWA of NSW strongly oppose the approval of the Narrabri Lateral Pipeline in its current form.

Impacts on Gomeroi Cultural Heritage

The Pilliga holds deep spiritual, social and cultural significance for the Gomeroi people. The National Native Title Tribunal has acknowledged that all water resources, particularly Bohena Creek, are of major cultural importance. The Tribunal has stated that no ground or surface disturbance should occur within 500 metres of Bohena Creek without Gomeroi consent.

Despite this, the proponent proposes to drill the pipeline directly underneath Bohena Creek and across six other major creeks, disturbing alluvial groundwater systems that are intimately connected to cultural identity and practice. The Environmental Impact Statement (EIS) does not address the cultural significance of Bohena Creek at all, nor does it acknowledge the Tribunal's findings.

Construction will destroy two known cultural heritage sites and damage four additional sites. The Gomeroi people have repeatedly stated that the integrity of the Pilliga is fundamental to their wellbeing and cultural practice and must be kept whole.

Level 2, 244 Coward St, Mascot NSW 2020
PO Box 222, Mascot, NSW 1460 • Telephone: 02 8337 0200 • Facsimile: 02 8338 1595
Email: info@cwaofnsw.org.au • Website: www.cwaofnsw.org.au

The Commonwealth has a statutory and moral obligation to consider these impacts alongside ecological matters. Failure to meaningfully address Gomeroi cultural heritage represents a profound gap in the assessment process and further strengthens the case that the project cannot proceed.

Failure to Avoid Significant Impacts on Listed Threatened Species

The proponent's own documentation identifies 23 nationally listed threatened species and multiple EPBC-listed ecological communities as known, likely, or potentially present within the affected area. These include:

- Regent Honeyeater
- Swift Parrot
- Koala
- Spot-tailed Quoll (SE mainland)
- Pilliga Mouse
- Superb Parrot
- Large-eared Pied Bat
- Australian Painted Snipe

The referral acknowledges direct and indirect impacts from clearing, fragmentation, hydrological disturbance, noise, vibration, light, and increased predator and weed pressure, yet concludes impacts will be “not significant”.

This conclusion is indefensible. Many species use the Pilliga–Narrabri landscape as a stronghold or last viable refuge, and even modest disturbance can have population-level consequences. Under the EPBC Significant Impact Guidelines, this indicates high risk, not negligible impact.

Impacts on Farmland and the Pilliga Forest

The pipeline will cut across 12 farms, with nearly half of the disturbed area comprising agricultural land and one-fifth made up of cropping land, placing productive farmland at risk from erosion, soil disturbance and long-term land-use constraints.

The remaining disturbance occurs through the Pilliga forest. Construction will clear 168 hectares of forest, carving a 30-metre-wide swathe through Pilliga East, a region recognised for habitat critical to microbats and small mammals. Species particularly exposed include:

- Pilliga Mouse
- Eastern Pygmy Possum
- Corben's Long-eared Bat

Taken together, these impacts compound the loss and fragmentation issues set out in Sections below.

Ecological Fragmentation and Permanent Habitat Loss

Approximately 285 hectares of land will be cleared or disturbed. The proponent argues this represents “less than 0.1%” of the Pilliga Forests and is therefore trivial. This minimisation is incorrect. Under the EPBC Act, significance is not determined by percentage of a landscape but by the function and quality of affected habitat. A 30–40-metre-wide pipeline easement represents:

- A permanent fragmentation corridor
- A route for weed and feral animal incursions
- A break in ecological connectivity used by woodland birds, mammals and bats

Fragmentation, not just clearing, is a primary cause of decline for many listed species in inland NSW.

Serious Risks to EPBC-Listed Ecological Communities

The referral acknowledges impacts on Grey Box Grassy Woodlands and Derived Grasslands of South-eastern Australia, among other threatened ecological communities. These communities have already suffered severe clearing across their range. Additional fragmentation, edge effects and erosion pressures represent exactly the type of cumulative attrition the EPBC Act is designed to halt. No adequate avoidance strategy is presented.

Insufficient Surveys and Significant Ecological Uncertainty

Large portions of the corridor have not been fully surveyed. Numerous species are listed as “potential” or “likely” solely because data remains incomplete. Seasonal, methodological and geographic limitations further compromise the assessment.

Under section 391 (precautionary principle) of the EPBC Act, high ecological uncertainty combined with high conservation stakes requires a precautionary response, not a presumption of minimal impact.

Water-Related Impacts and Cultural Water Values

Water impacts are central to both ecological and cultural outcomes. The pipeline intersects or influences:

- Riparian habitats
- Creek lines and floodplains
- Groundwater-dependent ecosystems
- Wetlands used by EPBC-listed birds

Risks include erosion, sedimentation, chemical contamination, altered drainage and long-term changes to alluvial groundwater. These are direct pathways to harm for threatened species and cultural water values. The referral does not adequately assess these impacts.

The Federal Court’s decision (December 4, 2025) confirms that, as the law is currently framed, the Narrabri Lateral Pipeline can be treated as separate from the coal seam gas extraction activities it is designed to serve and therefore falls outside the scope of the EPBC Act water trigger. While this ruling clarifies the legal position, it also exposes a serious gap in Australia’s environmental protections: essential gas infrastructure may proceed without comprehensive assessment of its impacts on water resources.

Critically, this legal separation does not mean that the pipeline, or the gas development it enables, will not adversely affect water resources. The pipeline will traverse multiple creeks, floodplains and groundwater-dependent systems connected to the Great Artesian Basin, and its construction and operation pose risks including disturbance of alluvial aquifers, changes to surface and subsurface hydrology, erosion, sedimentation and contamination. These impacts remain ecologically and culturally significant, particularly given the reliance of threatened species, EPBC-listed ecological communities and Gomeroi cultural values on healthy water systems. The absence of a triggered water assessment reflects a regulatory gap, not an absence of risk, and underscores the need for heightened scrutiny under the remaining controlling provisions of the EPBC Act.

Cumulative Impacts with the Narrabri Gas Project & Hunter Gas Pipeline

The Narrabri Lateral Pipeline is not a standalone proposal. It enables gas from up to 850 coal seam gas wells to flow into the Hunter Gas Pipeline (HGP).

Yet cumulative impacts from the wells, processing facilities, access roads, gathering lines, and the HGP corridor are not properly assessed. Without this, the ecological, hydrological and cultural impacts of the pipeline are grossly understated.

The EIS also claims the economic benefits of the Narrabri gas field and HGP, while taking no responsibility for the broader environmental, cultural, water or climate impacts.

Further, the EIS fails to quantify the negative economic impacts of greenhouse emissions from the gas field and pipelines, despite Narrabri being forecast to become the sixth-largest source of greenhouse pollution in NSW. This omission is substantial and undermines the integrity of the whole assessment.

Inadequate and Non-Enforceable Mitigation Measures

The proponent relies on:

- Broad, unenforceable statements (“where possible”)
- Future management plans not yet prepared
- Undefined monitoring
- “Adaptive management” used as a substitute for genuine avoidance

These fail to satisfy the Commonwealth requirement for clear, measurable and enforceable mitigation.

Failure to Demonstrate Genuine Avoidance

The EPBC mitigation hierarchy is unequivocal: Avoid, Mitigate, Offset.

The proponent has not demonstrated serious consideration of alternative routes, designs or construction methods that would avoid habitat and cultural impacts. Offsets cannot replace old-growth habitat, cultural sites, groundwater connectivity or ecological strongholds already under pressure. Avoidance, not compensation, is the only appropriate approach in an environment of this significance.

Conclusion

Based on the EPBC referral documents, the Controlled Action decision, the information regarding cultural heritage, and the requirements of the bilateral assessment process, the CWA of NSW concludes that:

- The referral understates the ecological, cultural and hydrological consequences of the pipeline.
- Significant impacts on listed species, ecological communities and Gomeroi cultural heritage are likely.
- The proponent has not demonstrated avoidance, credible mitigation or meaningful assessment of cumulative impacts.
- There is substantial ecological and cultural uncertainty, invoking the precautionary principle.

For these reasons, the CWA of NSW opposes approval of the Narrabri Lateral Pipeline as referred, and requests that the Commonwealth require a substantially more rigorous assessment of environmental and cultural impacts and reject the project unless the proponent can demonstrate that Matters of National Environmental Significance and Gomeroi cultural heritage will not be significantly harmed.



Tanya Jolly, State President
Country Women's Association of NSW