

Narrabri Lateral Pipeline Submission

Greenpeace Australia Pacific - December 2025

SUMMARY

Greenpeace Australia Pacific ('Greenpeace') objects to the Narrabri Lateral Pipeline and urges the NSW government to reject the project.

The proposed project harms the climate, biodiversity and cultural heritage. Significantly the pipeline will open the way for Santos' Narrabri Gas Project in the Pilliga Forest. The holistic project scale must be considered within the EIS. Santos' EIS for the pipeline does not take responsibility for the harm to biodiversity, water, cultural heritage, and climate from the Narrabri Gas Project it connects to and enables.

Our submission outlines our concerns regarding the following key areas:

- Biodiversity and threatened species impacts
- Contribution to climate change
- Gomeroi cultural heritage and consent

About Greenpeace

Greenpeace Australia Pacific is an environmental campaigning organisation. Our mission is to secure an earth capable of nurturing life in all of its magnificent diversity. Greenpeace Australia Pacific is an autonomous entity headquartered in Sydney with more than one million people participating across all platforms in our network. We participate as part of the global Greenpeace network. Greenpeace is fully independent, accepting no funding from any government, business or political party anywhere in the world.

Biodiversity and threatened species impacts

The holistic project scale must be considered within the EIS. Santos' EIS for the pipeline does not take responsibility for the harm to biodiversity from the Narrabri Gas Project it connects to and enables. The biodiversity impacts of the pipeline itself are inadequately considered and no amount of mitigation can limit the environmental damage it will bring.

The [2021 State of the Environment Report](#) concluded the majority of Australia's natural environment is in a "poor and deteriorating" state. As a nation we are failing in our duty to protect environmental values including endangered species, waterways and large, intact ecosystems.

Australia's extinction crisis is not simply historical¹

- Australia is the worst in the world for mammal extinctions.
- Since 2000, Australia's list of nationally threatened species and ecological communities has increased by more than 30%.
- At least four endemic animals have gone extinct in the last 10 years alone.

It would be irresponsible to allow this to be the fate of any of the 45 listed threatened species in the Narrabri Gas Project or Lateral Pipeline area.

Construction of the pipeline will clear 168 hectares of forest and will cut a 30 metre wide swathe through the Pilliga East forest. The EIS does not adequately address the impacts of the Narrabri Lateral Pipeline causing direct habitat clearance, habitat fragmentation, cumulative impacts, sedimentation of waterways and damage to riparian waterways.

The Narrabri Lateral Pipeline impacts high quality habitat in the Pilliga forests and woodlands by:

- Increasing the fragmentation of a Commonwealth-listed Biodiversity Hotspot already under severe environmental stress.
- Creating wide and effectively permanent barriers to vertebrate movement with the construction of linear corridors.
- Clearing and associated vehicle movements (project related and increased access more broadly) which will increase predation of vulnerable species from introduced vertebrates including the Red Fox *Vulpes vulpes*, Feral Cat *Felis catus* and Feral Pig *Sus scrofa* and increase the spread of invasive plant species, further damaging the Biodiversity Hotspot and habitat for vulnerable species.
- Increasing sedimentation of ephemeral waterways and reduced surface water essential to the maintenance of many vertebrate populations.
- Industrialisation of the landscape with significant increases in, dust, noise and lighting pollution.
- Continuing damage to high value riparian habitat.
- The loss of hollow-bearing trees, vegetation loss and contributing to the risk of increased fire frequency.

These impacts are not adequately or appropriately considered in Santos' EIS.

Significantly, the impact on the survival of the following EPBC listed threatened species are insufficiently considered: Pilliga Mouse, Spotted-tail Quoll, Koala, Regent Honeyeater, Five-clawed Worm Skink, Corben's Long-eared Bat. Nor plant species and communities: Critically Endangered

¹ IPBES (2019): Global assessment report on biodiversity and ecosystem services of the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services. E. S. Brondizio, J. Settele, S. Díaz, and H. T. Ngo (editors). IPBES secretariat, Bonn, Germany.

White Box Yellow Box Red Gum Woodland and Derived Native Grassland along the Bohena/Yaminah/Borah Creek system.

Santos should be required to adequately demonstrate that the project will not have an adverse effect on threatened species and ecological communities, and this work should be undertaken in line with national environment plans and standards before approval is granted. This should include a requirement to take into account cumulative impact considerations. Thus Greenpeace strongly recommends rejection of the Narrabri Lateral Pipeline.

Unacceptable Contribution to Climate Change

The Narrabri Lateral Pipeline should be rejected due to its contribution to climate change, with Narrabri predicted to be the sixth biggest source of greenhouse pollution in NSW.

The holistic project scale must be considered within the EIS. Santos' EIS for the pipeline does not take responsibility for the harm to the climate from the Narrabri Gas Project it connects to and enables, and the gas the pipeline will transport – though it considers the whole project in scope when referencing the supposed economic 'benefits.'

Total greenhouse gas emissions produced by the Narrabri Gas Project is estimated to be 127.8 million tonnes of carbon dioxide equivalent, or 5 million tonnes a year. In a time when Australia is struggling to meet its commitments under the Paris Climate Agreement, this one gasfield would increase Australia's greenhouse gas emissions at an unacceptable level.

Gas is a dirty fossil fuel, and building new gas projects is fundamentally incompatible with the world's goal to limit warming to 1.5 degrees, according to the International Energy Agency. In Australia, approximately [21% of carbon dioxide emissions come from gas](#). In order to reach net zero emissions by 2050, an essential step to limit global warming to 1.5C, we need no new investment in fossil fuels – including gas.

Santos is currently [being sued](#) for allegedly misleading investors, including for misrepresenting gas as 'clean energy' in spite of its harmful impact on the climate.

Australia is already almost halfway to powering our country with clean, affordable renewable energy, and gas usage is on the decline. [Australia has enough supply in existing gas fields to meet current domestic demand until 2032](#) – this gives us enough time to transition away from gas to renewables without any new projects.

Aboriginal heritage not adequately assessed and consent not obtained

The Pilliga is a sacred part of the traditional lands of the Gomeroi Traditional Owners who maintain a strong and continuing connection with their Country. The Pilliga is rich in Aboriginal cultural heritage and contains a large number and diversity of sites of significance for the Gomeroi people.

The Environmental Impact Statement (EIS) does not discuss the cultural significance of the entire Bohena Creek for Gomeroi people at all. The National Native Title Tribunal acknowledged that all

water resources, and Bohena Creek in particular, is of major cultural importance to Gomeroi people. The Tribunal said there should be no ground or surface disturbance within 500m of Bohena Creek without Gomeroi consent. However, with disregard to this guidance, Santos plans to drill the pipeline right under Bohena Creek and across six other major creeks, disturbing the alluvial groundwater.

Construction of the pipeline will also wipe out two known sites of significance and damage a further four sites. Gomeroi people have said the Pilliga's integrity is central to their wellbeing and cultural practice and must be kept whole.

We are concerned that Aboriginal consultation was not undertaken in an appropriate way and Santos fails to understand the landscape scale connection to Country and the holistic responsibility as protectors of Country that is intrinsic to Gomeroi culture. You can read more about Gomeroi opposition to the project [here](#).

Australia is a signatory to the United Nations Declaration on the Rights of Indigenous People; regulators in NSW have a responsibility to ensure that Free, Prior and Informed Consent is obtained before any project proceeds on Indigenous lands.

For all of these reasons, Greenpeace recommends the rejection of the Narrabri Lateral Pipeline.