

Submission – Objection to Narrabri Lateral Pipeline (SSI-53307723)

To the Department of Planning, Housing and Infrastructure / Minister for Planning and Public Spaces,

I am a NSW small business owner and a frequent visitor to the Narrabri and Pilliga region. I value the local community, the region's natural beauty and wildlife habitat, and the agricultural landscapes that underpin regional livelihoods and the food production we rely upon. After reviewing the EIS and supporting reports on exhibition, I lodge this submission to **object** to the Narrabri Lateral Pipeline and request that it be **refused**.

My objection is based on core deficiencies in the proponent's assessment that go to the heart of whether this project can be lawfully and responsibly determined at this stage. These issues are widely echoed across the community, including among Traditional Owners, landholders, regional businesses, and many civil society organisations:

- The Proponent's assessment of Aboriginal cultural heritage is **fundamentally incomplete**, as the EIS explicitly admits that a "**further cultural values assessment**" is **still required** to deepen the understanding of intangible cultural values such as songlines and spiritual connections (Chapter 12, Heritage). It is procedurally flawed to seek approval while acknowledging that the assessment of potential harm to the **spiritual context of the landscape is unfinished**, a critical omission given that the project's status as **Critical State Significant Infrastructure exempts it from requiring an Aboriginal Heritage Impact Permit (AHIP)**, thereby removing the usual statutory safety nets for heritage protection (Chapter 4, Statutory Context).
- There is a critical weakness in the assessment of groundwater risks where the Proponent relies on the "**minimal impact considerations**" of the NSW Aquifer Interference Policy to claim **no mitigation is required**, despite proposing trenchless drilling through sensitive recharge areas like Bohena Creek (Chapter 8, Water). This approach ignores the **integral nature of this pipeline to the wider Narrabri Gas Project**; by separating the pipeline's assessment from the gas field, the Proponent avoids the stricter federal scrutiny of the "**water trigger**" despite the pipeline being essential infrastructure that facilitates the very coal seam gas extraction that threatens the Great Artesian Basin (CCBR to DCCEE submission).
- The cumulative impact assessment is **materially defective** because it selectively excludes major relevant projects, most notably the **Narrabri Underground Mine Stage 3 Extension**, under the guise of "insufficient publicly available information" (Chapter 19, Cumulative Impacts). This exclusion, combined with the "**salami slicing**" of the pipeline from the gas field assessment, dilutes the true cumulative severity of industrialisation in the Pilliga, ignoring the reality that community stakeholders **do not distinguish** between these overlapping projects and the total degradation they impose on the region (Technical Report 11, Social Impact Assessment).

- The biodiversity assessment contains **significant data gaps and potential inaccuracies** because a large portion of the subject land was severely burnt in the December 2023 "Duck Creek" bushfire, forcing the Proponent to rely on adapted survey methodologies rather than **comprehensive contemporary data** (Technical Report 1a, BDAR). It is reckless to approve the clearing of approximately 168 hectares of native vegetation without a completed analysis - **requested by the Commonwealth** - of whether the remaining unburnt habitat has now become **critical refuge** for the survival of threatened species like the Koala and Pilliga Mouse (Appendix A, SEARs compliance table).

- The Proponent's narrative regarding local economic benefits is **misleading**, as the Social Impact Assessment concedes that the majority of construction roles require **specialised skills that must be sourced from outside the local region** - Chapter 15, Social and Economic. Consequently, the project relies on a transient **"fly-in/fly-out" workforce** of up to 200 people which risks straining local accommodation and services, meaning the long-term economic value is largely exported while the **biosecurity and social risks remain** with local business owners and residents (Technical Report 11, Social Impact Assessment).

- The EIS contains a significant **accounting loophole** by describing the project's greenhouse gas emissions as "negligible" (0.003% of the NSW carbon budget) because it **excludes the combustion of the gas** the pipeline is specifically built to transport - Chapter 18, Greenhouse Gas. This exclusion of Scope 3 emissions presents an **untruthful picture** of the project's climate impact, as the pipeline is the enabling infrastructure that allows the gas from the Narrabri Gas Project to be brought to market and burned (Chapter 18, Greenhouse Gas).

- The construction impact assessment relies on **qualitative rather than quantitative modelling** for key pollution metrics; specifically, the EIS admits that **no quantitative dispersion modelling** was undertaken for air quality despite classifying earthworks dust emission magnitude as **"large"**, and noise assessments predict exceedances of the **35 dBA management level** at multiple residences, creating an unquantified and unacceptable amenity risk for local business owners and residents (Chapter 10, Air Quality; Chapter 9, Noise and Vibration).

- The Proponent's claim of social license is contradicted by an **extraordinary breadth of community opposition** spanning every sector of civil society. This includes **First Nations groups** (Gomeroi Traditional Owners, Gomeroi Yinarr of Nharribaraay, Warriors of the Aboriginal Resistance, Gamilaraay Next Generation), **Agricultural bodies** (NSW Farmers, Farmers for Climate Action, Country Women's Association of NSW), and key **Unions** via Unions NSW (including the Electrical Trades Union, Maritime Union of Australia, NSW Nurses and Midwives' Association, Independent Education Union, Australian Services Union, and Australian Salaried Medical Officers Federation).

Opposition also includes **local community groups** (People for the Plains, Mullaley Gas & Pipeline Accord, North West Protection Advocacy, Coonabarabran Residents Against Gas, CSG Free North West), **Health and Science experts** (Doctors for the Environment Australia, Emergency Leaders for Climate Action, Friends of Siding Spring Observatory, The Australia Institute), and **Environmental organisations** (Lock the Gate, Environmental Justice Australia, Environmental Defenders Office, Knitting Nannas Against Gas & Gasfields, The Wilderness Society).

Requested outcome

For the reasons above, I object to this project and request the project be **refused**. At a minimum, it should not be determined until the key missing work is completed and publicly exhibited (including the further intangible cultural values assessment, post-fire biodiversity analysis, and a genuinely complete cumulative impact assessment that does not exclude major relevant projects).

Sincerely,

Rhys Cornock

Managing Director - Sprout Scientific