

18th December, 2025

To whom it may concern,

Thank you for the opportunity to strongly object to the proposed Narrabri Lateral Pipeline project.

As a local Narrabri woman, I strongly suggest this proposal should be refused and re-assessed.

The following submission outlines some ways the project summary and conclusions understate and simplify issues raised in the EIS, demonstrating that the risks are not properly understood or mitigated.

Cumulative Impacts:

- The breakup of the Narrabri Gas Project, Hunter Gas Pipeline and Narrabri Pipeline into 3x state significant projects, rather than being assessed together makes the packaged information discriminatory to the purpose of project acceptance, rather than assessing all positive and negative impacts in a measured way. Without assessing the project impacts together, there is a risk of benefits being exaggerated, and risks not properly mitigated.
 - There is in fact, a statement in the EOI that suggests it is difficult to pull apart one project from another- of course it is- they are the same broader goal and project. The intention to state '*When (the pipeline) is considered on its own, is not expected to affect cohesion at the community level*' means to undermine the total project implications which could be considered a largely misrepresented statement, considering that the Narrabri Gas Project needs the pipeline to transport gas.
 - The current pipeline project is not being assessed in conjunction with larger impacts and projects for which it is dependent on. Within the EIS there is lack of quantification for accumulated impacts regarding Narrabri Gas Project (and the multiple wells required) as well as the 833km long Hunter Gas Pipeline, both for which this project is adjoined and dependent on- risks are therefore understated and suggest they should be re-assessed.
 - Although 'cumulative impacts' are mentioned in chapter 19 of the EIS, it fails to demonstrate the risks of all projects combined- deeming this 'unnecessary to cause'. For example, risks to the Great Artesian Basin are not even mentioned- and groundwater cumulative risks are noted as '*no cumulative impacts in operation or decommission*'. Another example is the Greenhouse gas emissions which again- did not combine those of the three projects- and pulled out the small area covered by this pipeline expansion. The lack of assessment does not fairly represent 'cumulative impacts' and should be reconsidered with total impacts rightly evaluated before project acceptance.

Decommissioning:

- The EIS has not stated as to when this is likely to be, nor has it included an ongoing monitoring or maintenance assessment alongside the decommission to mitigate ongoing project impacts. It has claimed that '*the pipeline would be left in place*' at project completion.
 - This suggests that impacts of the construction (such as the inability to effectively replenish removed habitat such as planting long rooted trees) will be ongoing beyond the life of this project. It also suggests that the promised infrastructure maintenance such as pipe corrosion or waste and biosecurity management would stop beyond the life of this project.
 - Very little information is provided about this process- just the notion that at some point in time there will be a management plan for the project completion. These ongoing impacts have not been sufficiently modelled or represented in the EIS to ensure impacts satisfy or rehabilitate the landscape and waterways to a standard that is the same or better than pre-construction.
 - There is also lack of information regarding what resources and costs will be assigned to this process.
 - Previous projects owned and managed by Santos do not provide assurance of environmental and social values being maintained beyond the economic extraction life of the project. It suggests a large risk in impacts that have not currently been assessed in this proposal and a lack of appropriate management plan considered. This can be seen in examples such as Barossa Gas Project, WA pipeline kinks, NT methane links.

Social Impact:

- The project states '*it is not expected to cause impacts that would significantly affect social cohesion, capital and resilience*'. The social impact assessment noted the negative impacts as low to medium. This is a severe misrepresentation of the community's mental and physical stresses.
 - For example, Section 15.2.5 fails to state that over 98% of submissions to the Narrabri Gas project in 2020 were against the project- 23,000 submissions against the project that have not been valued and have a considerable mental health cost to the community and ongoing distrust in government processes. This point has not been valued at all in the current submission, despite this project being related and dependant on the other.
 - The Social Impact Assessment also does not account for the 15 years plus stress on individuals, property owners and businesses due to the combined project's stretched timeline and implications. It also does not account for the disruption in family dynamics, social exclusion etc that have occurred over this period. For example, the football club is now sponsored by Santos, which can make it difficult for those with moral values against Santos to enjoy town sport and not feel conflicted. The stress implications within the community have not been measured or accounted for.

- The low to moderate rating also minimising the extent of the trauma for the local Gomeroi people vastly opposed to this project, and the community unrest that results.
 - The social study fails to recognise the strong opposition of the Gomeroi people for over a decade raising concerns for cultural heritage, water resources and climate change. It does not recognise cultural disputes, stress or impacts from offers for compensation packages, Native Title Tribunals and Federal court interventions.
 - It fails to recognise the cultural significance and spiritual implications of the six Aboriginal heritage sites that are located within the disturbance footprint and will have direct impact, nor that the cultural management plans that have yet to be completed or assessed in regard to songlines and spiritual connections.
 - It also fails to recognise the social implications or social licence for how consultation in regard to this project has been conducted and the social unrest it causes, including the offer of ‘compensation’ packages. The ability for a private company to privately offer compensation – when the impacts of the decision have broadscale community, waterway and national carbon impacts should be explored before any suggestion of project approval.
- The study also fails to mention potential shifts of residents that are opposed or displaced due to industry activities. I can personally attest that I have not moved back to my hometown of Narrabri due to conflicting values associated with the gas project and concerns for community and environmental well-being. This is a cost that is not currently being measured socially or economically.
- The economic and social implications of the gas project for recreation users of the forest have also not been assessed in full and should be considered in this study.

Market claims:

- There are claims that gas will be for domestic market- while the ownership of Santos is still in flux, with potential Foreign Investment Review Boards. This should be addressed before any on-ground structures are built, mitigating risk and economic and environmental impacts.
 - No determination should be made without specific conditions that this 100% domestic export commitment be upheld, regardless of any sale of or within the company.
 - Furthermore, the intentions for Santos regarding the Queensland gas supply for the domestic market should also be conditioned upon this project approval. For example, if there is expected to be extra supply than demand in totality of the two state markets- it allows for further evaluation of the validity of this project. This is especially relevant with gas markets expected to decline and initial approval of the pipeline being all the way back in 2009.

Biodiversity:

- The EIS summary downplays the biodiversity impacts that are listed in the specific EOI biodiversity assessment further in the document. These impacts need to be fully noted and discussed as to their full implications.
 - For example, impacts on specific species populations:
 - Three ecological communities listed as endangered under the EPBC Act will be directly impacted by clearing of 168.24 hectares of vegetation.
 - Of the 6x threatened flora species present in these ecosystems, 2x are also endangered (Winged Peppergrass, and Native Milkwork) and of the further 9x additional assumed present in these ecological communities, an additional 5x are endangered (Cone Umbrella Rush, Finger Panic Grass, Belson’s Panic Grass, Large-leafed Monotaxis, Scant Pomaderris).
 - 18 threatened fauna species were recorded including the endangered Koala, the endangered south-eastern Spotted tail quoll and Large-eared Pied Bat. Also species recognised as needing significant conservation support including the Eastern Pygmy Possum and Glossy Black Cockatoos are found in the impacted location.
 - The Swift Parrot, Regent Honeyeater, South Eastern Hooded Robin- all critically endangered and found in this landscape with the potential for populations to be directly affected.
 - The Pilliga mouse is likely to be negatively affected, and it is found no-where else.
 - It is estimated that about 184 hollow bearing trees may need to be removed during construction- which can significantly impact population health and breeding for many of the species mentioned including the Regent Honey Eater.
 - Impacts from fragmentation:
 - Fragmentation is mentioned in the EIS, especially in reference to the permanent easements affecting species movements and habitat fragmentation, however the EOI doesn’t mention that the Pilliga is considered the largest continuous remnant of temperate woodlands in the state. Nor does it explore the overarching ecosystem health implications with further fragmentation due to the pipeline, together with the existing fragmentation of the dry sclerophyll forests and woodlands from roads, agricultural land and fences.
 - The EIS suggests that a fauna connectivity strategy will be developed and implemented during project operation. However it is suggested that this should be done prior to any approvals so that potential risks can be best mitigated before clearing. Furthermore, the assessment of the health of this ecosystem relative to the state-wide/national implications of fragmenting further needs to be explored. Also, the costs of this should be considered in the overarching values/cost benefit assessment.
 - The EIS suggests that initial impacts of habitat connectivity for several threatened species (Eastern Pygmy Possum, Pilliga Mouse, Corben’s Long eared Bat and the Squirrel Glider) will lessen through the project, however, this significantly undermines the initial potential breeding and population impacts of habitat clearing. It also doesn’t reflect the intention that the easements, roads and pipeline will remain even after project completion. This provides further evidence that a species specific evaluation should be undertaken as part of project evaluation.
 - Impacts on other state and national conservation efforts:
 - Conservation efforts by organizations like the [NSW National Parks and Wildlife Service](#) and the [Australian Wildlife Conservancy](#) are ongoing to protect this unique environment, including reintroduction programs for

locally extinct mammals like the Greater Bilby. The implications of this project on their studies and program success has not been evaluated.

- Similarly, the EIS does not consider the economic and environmental and social implications of government funds for other programs. For example, the removal of hollows can have direct implications on the Regent Honey Eater, which has been recognised Nationally as a species of significance, and the government is in fact supporting multiple initiatives in conserving and protecting habitat and breeding programs. What is the cost of not further investigating and supporting these sites for species conservation? [National Recovery Plan for Regent HoneyEater](#); [Vic state government](#), [NSW State Government](#). We can say the same for [The Swift Parrot](#) (<https://www.zoo.org.au/fighting-extinction/local-threatened-species/swift-parrot/>; <https://www.nespthreatenedspecies.edu.au/projects/saving-the-swift-parrot>), Koala, Spotted Quoll, Glossy Black-Cockatoo and Eastern Pygmy Possum and Large-eared Pied Bat. It is important to not overstate the benefits of this project to properly investigate other programs of work and strategies that can be affected such as NetZero, Carbon abatement and biodiversity conservation.
- Project land size:
 - In the EIS, the subject land that has been assessed for biological impacts is the disturbance footprint (212ha) which is a subset of the broader project site (375 ha). This is understating potential impacts and the entire project site should be assessed. Even if this area has been previously disturbed under the prior approvals- this is an accumulated impact for the Narrabri Gas Project and again feels the proposal is not giving a fair framing.
- Credit species:
 - The project lands itself in an area of ecosystem and species credits. The economic costs of disruption or health decline of this area and the potential impacts on credits have not been articulated in the EIS.
- Aquatic Species:
 - The EOI also suggests this project is not likely to affect threatened aquatic species or threatened aquatic ecological communities, however this does not take into account the combined impact from the Narrabri Gas Project, Hunter Gas Pipeline, the impacts of sediment and erosion, vegetation clearing on water quality and aquatic species health.

Environmental

- The EOI suggests no impacts on water quality are anticipated during operation. This statement understates the risks of sediment and erosion and vegetation removal. The project site crosses 45 watercourses. Vegetation plays an important role in filtering the water before it enters the water table. Removing vegetation and creating more impermeable surfaces is extremely important for water quality however, although remediation efforts will take place, the short- and long-term impacts of affecting over 95 000 hectares in the Narrabri Gas project, alongside the 168.24 hectares of vegetation in the pipeline project and the impacts on water quality have not been significantly explored.
- The EOI states that soil erosion is a potential risk during construction associated with temporary stockpiles and the presence of dispersive subsoils and suggests that once the pipeline trench has been backfilled, topsoil reinstated and vegetation re-established, the erosion risk would be similar to existing conditions. This does not account for direct removal of trees and roots, the inability to re-establish trees above the pipeline, and the ongoing soil structural decline and soil salinity and overarching health risks of vegetation changes. It also doesn't properly account for edge effects and impacts of rain on roads and cleared sites. Suggest a proper sediment and erosion control study be completed prior to project approvals to ensure proper controls are adhered to, and staff are trained appropriately. This should also be considered in the project costs.
- Biosecurity risks of clearing are not adequately addressed. Weed species included five priority weed species, 13 high threat weeds species and five weeds of national significance including African Boxthorn, Tiger Pear, Prickly Pear, Fireweed and Silver-leaved Nightshade are likely impacts. There are increased biosecurity risks associated with this project not adequately explored including potential for site contamination, edge effects and ongoing implications after the project has finished. These need to be further anticipated and mitigated to prevent further landscape decline and further degradation and impacts on native vegetation.
- The environmental impacts of new access and road upgrades including Kamilaroi Highway and Baan Baa Waste Facility intersection, along with temporary workspaces- impacts and actions to mitigate risks should be outlined in further detail in the EIS.

In conclusion, this submission argues that the potential impacts are not considered acceptable or manageable in this project's current proposal. I do not consider that the benefits articulated outweigh the risks. Thanks for consideration of my concerns.