

DEPARTMENT OF THE ENVIRONMENT AND ENERGY

To: Andrew McNee, Assistant Secretary, Assessments and Governance Branch (for decision)

Referral Decision Brief – Galilee Gas Pipeline Project, Qld (EPBC 2019/8484)

Timing: 15 August 2019 - Statutory timeframe.

Recommended Decision	NCA <input type="checkbox"/> NCA(pm) <input type="checkbox"/> CA <input checked="" type="checkbox"/>												
Designated Proponent	Jemena Northern Gas Pipeline Pty Ltd ACN: 607928790												
Controlling Provisions triggered or matters protected by particular manner	<table border="0"> <tr> <td>World Heritage (s12 & s15A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>National Heritage (s15B & s15C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>Ramsar wetland (s16 & s17B) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>Threatened Species & Communities (s18 & s18A) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>Migratory Species (s20 & s20A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>C'wealth marine (s23 & 24A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>Nuclear actions (s21 & 22A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>C'wealth land (s26 & s27A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>C'wealth actions (s28) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>GBRMP (s24B & s24C)* Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> <tr> <td>A water resource – large coal mines and CSG (s24D & s24E) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> <td>C'wealth heritage o/s (s27B & 27C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/></td> </tr> </table>	World Heritage (s12 & s15A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	National Heritage (s15B & s15C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Ramsar wetland (s16 & s17B) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Threatened Species & Communities (s18 & s18A) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No if PM <input type="checkbox"/>	Migratory Species (s20 & s20A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth marine (s23 & 24A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Nuclear actions (s21 & 22A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth land (s26 & s27A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth actions (s28) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	GBRMP (s24B & s24C)* Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	A water resource – large coal mines and CSG (s24D & s24E) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth heritage o/s (s27B & 27C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>
World Heritage (s12 & s15A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	National Heritage (s15B & s15C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>												
Ramsar wetland (s16 & s17B) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	Threatened Species & Communities (s18 & s18A) Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> No if PM <input type="checkbox"/>												
Migratory Species (s20 & s20A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth marine (s23 & 24A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>												
Nuclear actions (s21 & 22A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth land (s26 & s27A) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>												
C'wealth actions (s28) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	GBRMP (s24B & s24C)* Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>												
A water resource – large coal mines and CSG (s24D & s24E) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>	C'wealth heritage o/s (s27B & 27C) Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> No if PM <input type="checkbox"/>												
Public Comments	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Number: 24 See Attachment C												
Ministerial Comments	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Who: Departments of Agriculture, Department of Industry, Innovation and Science, Geoscience Australia and Queensland Department of Environment and Science (See Attachment D)												
Assessment Approach Decision	Yes <input type="checkbox"/> No <input type="checkbox"/> Bilateral Applies <input checked="" type="checkbox"/>												
Recommendations:													
1. Consider all of your obligations under the EPBC Act, the information in this brief, the referral (Attachment A) and other attachments.													
	Considered / Please discuss												
2. Agree with the recommended decision.													
	Agreed / Not agreed												
3. Agree to the designated proponent.													
	Agreed / Not agreed												

4. If you agree to 2, indicate that you accept the reasoning in the Departmental briefing package as the basis for your decision.

Accepted / Please discuss

5. Note that the proposed action will be assessed for the purposes of the EPBC Act under the bilateral agreement with the State of Queensland.

Noted / Please discuss

6. Agree to the fee schedule with justifications (Attachment E) and that the fee schedule without justifications (Attachment F) be sent to the proponent.

Agreed / Not agreed

7. Note an invoice will be provided in the letter to the person proposing to take the action for Stage 1 of the assessment, input into the terms of reference.

Noted / Please discuss

8. Sign the notice at Attachment G, which will be published if you make the recommended decision.

Signed / Not signed

9. Sign the letters at Attachment H.

Signed / Not signed

Date:

**Andrew McNee
Assistant Secretary
Assessments and Governance Branch:**

Comments:

KEY ISSUES:

- The proposed action will result in the clearance of habitat of habitat for listed threatened species and communities, including up to 134.54 ha of koala habitat.
- The proponent anticipates that proposed action will be assessed by Environmental Impact Statement (EIS) under the bilateral agreement between the Commonwealth government and Queensland State government.
- The Department received 24 public comments about the proposed action, most of which were a campaign against the Galilee Gas Pipeline Project organised by the Lock the Gate Alliance.

BACKGROUND:

Description of the referral

A valid referral was received on 18 July 2019. The action was referred by Jemena Northern Gas Pipeline Pty Ltd (the proponent), which has stated its belief that the proposal is a controlled action for the purposes of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

Description of the proposal (including location)

The proponent is proposing to construct and operate the Galilee Gas Pipeline (GGP), a 585 kilometre (km) buried high-pressure gas pipeline and associated facilities from Galilee Energy's Glenaras Gas Project near Longreach to the Queensland Gas Pipeline near Injune, Queensland. The referral notes that the construction and operation of the Galilee Gas Pipeline is intended to span approximately 40 years, from 2022 to 2063.

In 2017, the proponent signed a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market. The proponent and its related entities own and operate several gas transmission pipelines, including the Queensland Gas Pipeline and the recently constructed Northern Gas Pipeline (EPBC 2015/7569) ([Attachment A](#)).

The proponent has identified a 10 km wide construction corridor as the proposed action area, based on an assessment of land tenure, geology and topography, environmental and cultural heritage constraints, and stakeholder attitudes. The pipeline alignment within this corridor will be refined based on the outcomes of further stakeholder consultation and cultural heritage and ecological surveys during the assessment process. A 30-40 m wide pipeline construction Right of Way (RoW) will be selected in the alignment corridor where construction activities will occur ([Attachment A2](#)). An operational easement of 30 m in width will be permanently maintained. The proponent has estimated the disturbance footprint at 2,950 hectares (ha) ([Attachment A](#)).

The referral states the pipeline will be laid in a trench with a minimum depth of cover of 750 mm. However, at watercourse crossings the minimum depth of cover will be at least 1200 mm. Pipeline installation activities at watercourses will be undertaken during the dry season ([Attachment A2](#)).

The proposed action will involve the construction of the following components within the construction RoW and construction corridor ([Attachment A2](#)):

- two scraper stations;
- two compressor stations;
- two mainline valves;
- ten temporary worker's camps, to be removed and relocated as construction progresses, including wastewater treatment facilities, power generators, potable water storage, and co-located construction depots;
- upgrades to approximately twelve existing access tracks;
- additional construction infrastructure, including pipe laydown areas, temporary dams, timber stockpiles, and truck turnaround areas.

Description of the environment

The environment along the planning corridor varies and includes areas of native grassland, *Cypress* and *Allocasuarina* forest, *Acacia* forest and woodlands, and *Eucalypt* and Brigalow woodlands. The referral notes that the eastern section of the project area is predominantly non-remnant vegetation, although ground-truthing of the vegetation communities in the area found a greater extent of remnant vegetation than is mapped by the Queensland Department of Environment and Science (DES). The central and western section is predominantly remnant native grassland communities ([Attachment A6](#)).

The land use within the project area is predominantly livestock grazing ([Attachment A6](#)). The referral notes that the project area has been subject to a prolonged drought, which, combined with land management practises such as land clearing and overgrazing, has affected the condition of the local environment ([Attachment A](#)).

The project area passes through the Cooper Creek, Warrego, Balonne-Condamine, and Fitzroy river Basins. The alignment crosses 18 watercourses considered to be at major risk of impact by the Queensland Department of Agriculture and Fisheries ([Attachment A5](#)). The proponent does not consider that there will be long term modifications to the watercourses as a result of the proposed action, or that there will be significant impacts to a Ramsar Wetland, Commonwealth Marine environment, or the Great Barrier Reef Marine Park ([Attachment A](#)).

State assessment process

The referral states that the proposed action triggers the requirement for an Environmental Impact Statement (EIS) in accordance with Chapter 3, Part 1 of the *Environmental Protection Act 1994* (Qld). On 19 July 2019, the delegate of the Hon Leanne Enoch, Queensland Minister for Environment and the Great Barrier Reef, notified the Department that the proposed Galilee Gas Pipeline Project will be assessed under the Bilateral Agreement with Queensland.

RECOMMENDED DECISION:

Under section 75 of the EPBC Act you must decide whether the action that is the subject of the proposal referred is a controlled action, and which provisions of Part 3 (if any) are controlling provisions for the action. In making your decision you must consider all adverse impacts the action has, will have, or is likely to have, on the matter protected by each provision of Part 3. You must not consider any beneficial impacts the action has, will have or is likely to have on the matter protected by each provision of Part 3.

The Department recommends that you decide that the proposal is a controlled action, because there are likely to be significant impacts on the following controlling provisions:

- Listed threatened species and communities (section 18 & section 18A);
 - Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) (*Phascolarctos cinereus*) – vulnerable
 - Greater Glider (*Petauroides Volans*) – vulnerable
 - Corben's Long-eared Bat (*Nyctophilus corbeni*) – vulnerable
 - Yakka Skink (*Egernia rugosa*) – vulnerable
 - Squatter Pigeon (southern) (*Geophaps scripta scripta*) – vulnerable
 - Dunmall's Snake (*Furina dunmalli*) – vulnerable

- Plains Death Adder (*Acanthophis hawkei*) – vulnerable
- Collared Delma (*Delma torquate*) – vulnerable
- Julia Creek Dunnart (*Sminthopsis douglasi*) – vulnerable
- Large-eared Pied Bat (*Chalinolobus dwyeri*) – vulnerable
- Red Goshawk (*Erythrorchis radiatus*) – vulnerable
- Painted Honeyeater (*Grantiella picta*) – vulnerable
- Ooline (*Cadellia pentastylis*) – vulnerable
- *Eucalyptus virens* – vulnerable
- *Bertya calycina* – vulnerable
- Brigalow (*Acacia harpophylla* dominant and co-dominant) – endangered
- Semi-evergreen Vine Thickets of the Brigalow Belt (North and South) and Nandewar Bioregions – endangered

These impacts are discussed respectively below.

Listed threatened species and communities (s18 & 18A)

The Department's Environment Reporting Tool (ERT) identifies 37 species and communities may occur within 1 km of the project area (Attachment B). Based on the information contained in the referral documentation, the nature and scale of the proposed action, and likely habitat present in the area of the proposed action the Department considers that impacts potentially arise in relation to the following matters.

Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) (*Phascolarctos cinereus*) - Vulnerable

Species information

The listed species range of the vulnerable koala extends from north-eastern Queensland to the Victorian border. The total population has been observed to have declined across its range from 1990 – 2010 (SPRAT). The Department's SPRAT database states that koala habitat "can be broadly defined as any forest or woodland containing species that are known koala food trees, or shrubland with emergent food trees". Koala food trees include *Eucalyptus*, *Corymbia*, *Angophora*, and *Lophostemon* species. The key threats to the species are ongoing habitat loss and habitat fragmentation, vehicle strike, and predation by domestic and feral dogs. Drought and extreme heat are also known to cause significant mortality.

Proposed action area

The referral states that areas of habitat containing >50% of koala food tree species occur within the proposed action area (Attachment A6). A mature male koala was recorded along the Maronoa River in the proposed action area during surveys undertaken in October 2018. Scats and tree scratches were also observed within the riparian open forest along Highlands Plains Creek, Ah See Creek, and Bedurie Creek (Attachment A6).

Habitat within the proposed action area received a score of 9/10 using the habitat assessment tool in the Department's *EPBC Act referral guidelines for the vulnerable koala (2014)* (Attachment A6). Impact areas that receive a score of equal to or greater than 5/10 are considered to contain habitat critical to the survival of the koala.

Potential impacts

The referral considers that the main impact to the koala is habitat clearing (Attachment A6). The referral states that up to 134.54 ha of koala habitat may be cleared during the proposed action. The *Referral guidelines for the vulnerable koala* consider “the loss of 20 hectares or more of high quality habitat critical to the survival (habitat score of ≥ 8) is highly likely to have a significant impact for the purposes of the EPBC Act.”

Conclusion

Based on the information provided above and consideration of the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance* (2013), the Department considers that there is a real chance or possibility that the proposed action will adversely affect habitat critical to the survival of the koala.

The Department therefore considers that a significant impact on the vulnerable koala is likely.

Other listed species and ecological communities

The referral states that five EPBC Act listed fauna species were detected during surveys of the project area: Koala, Greater Glider, Corben’s Long-eared Bat, Yakka Skink and Squatter Pigeon. Two ecological communities, Brigalow (*Acacia harpophylla* dominant and co-dominant) and Semi-evergreen Vine Thickets of the Brigalow Belt (North and South) and Nandewar Bioregions, were also confirmed as being present within the survey corridor.

On the basis of all the information available to the Department (including the ERT, which suggests the presence of the following species and communities in the area of the proposal), the Department considers that there is a real chance or possibility that project activities will also significantly impact on the following:

- Greater Glider (*Petauroides Volans*) – vulnerable
- Corben’s Long-eared Bat (*Nyctophilus corbeni*) – vulnerable
- Yakka Skink (*Egernia rugosa*) – vulnerable
- Squatter Pigeon (southern) (*Geophaps scripta scripta*) – vulnerable
- Dunmall’s Snake (*Furina dunmali*) – vulnerable
- Plains Death Adder (*Acanthophis hawkei*) – vulnerable
- Collared Delma (*Delma torquate*) – vulnerable
- Julia Creek Dunnart (*Sminthopsis douglasi*) – vulnerable
- Large-eared Pied Bat (*Chalinolobus dwyeri*) – vulnerable
- Red Goshawk (*Erythroriorchis radiatus*) – vulnerable
- Painted Honeyeater (*Grantiella picta*) – vulnerable
- Ooline (*Cadellia pentastylis*) – vulnerable
- *Eucalyptus virens* – vulnerable
- *Bertya calycina* – vulnerable
- Brigalow (*Acacia harpophylla* dominant and co-dominant) – endangered
- Semi-evergreen Vine Thickets of the Brigalow Belt (North and South) and Nandewar Bioregions – endangered

The Department recommends that impacts to the listed threatened species and communities listed above be addressed during the assessment process.

The Department's ERT identifies the potential presence of an additional 20 listed threatened species and communities within one kilometre of the proposed action area. Based on information available to the Department in the referral documentation, SPRAT database and associated statutory documents, the Department considers that significant impacts to these species and communities are unlikely.

PROTECTED MATTERS THAT ARE NOT CONTROLLING PROVISIONS:

Listed migratory species (s20 & 20A)

The Department's ERT identifies 12 migratory species that may occur within 1 km of the project area (Attachment B). Based on the information contained in the referral documentation, the nature and scale of the proposed action, and likely habitat present in the area of the proposed action, the Department considers that impacts potentially arise in relation to the following matters.

Glossy Ibis (*Plegadis falcinellus*), Oriental cuckoo (*Cuculus optatus*), Satin Flycatcher (*Myiagra cyanoleuca*), Latham's Snipe (*Gallinago hardwickii*)

The referral considers that suitable habitat for the migratory Glossy Ibis, Oriental Cuckoo, Satin Flycatcher, and Latham's Snipe occurs within the proposed action area, including areas of habitat found in the threatened ecological communities identified in the area. None of the species were recorded in the proposed action area during surveys undertaken in October 2018 or April 2019 (Attachment A6).

In accordance with the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance*, the referral states that these species are unlikely to be significantly impacted by the proposed action because the proposed action area is not likely to support important habitat for these species or an ecologically significant proportion of their population (Attachment A6).

Based on information available to the Department in the referral documentation, SPRAT database and associated documents, the Department considers that although listed migratory bird species may occur within the proposed action area, the area is not likely to support important habitat for migratory species or an ecologically significant proportion of any species' population.

Based on the information provided above and consideration of the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance*, the Department does not consider that there is a real chance of possibility that the proposed action will:

- substantially modify (including by fragmenting, altering fire regimes, altering nutrient cycles or altering hydrological cycles), destroy or isolate an area of important habitat for a migratory species;
- result in an invasive species that is harmful to the migratory species becoming established in an area of important habitat for the migratory species; or
- seriously disrupt the lifecycle (breeding, feeding, migration or resting behaviour) of an ecologically significant proportion of the population of a migratory species.

Therefore, the Department considers that a significant impact on migratory species including the Glossy Ibis, Oriental Cuckoo, Satin Flycatcher, or Latham’s Snipe is unlikely.

Other listed migratory species

The Department’s ERT identifies the potential presence of an additional 8 listed migratory species within one kilometre of the proposed action. Based on information available to the Department in the referral documentation, SPRAT database and associated statutory documents, the Department considers that significant impacts to these migratory species are also unlikely.

For this reason, that Department considers that sections 20 and 20A are not controlling provisions for the proposed action.

<p>Ramsar Wetlands (s16 & 17B)</p>	<p>The ERT identified the catchment areas of six Ramsar listed Wetlands of International Importance within the proposed action area.</p> <p>The Department notes that based on the ERT (Attachment B) the proposed action area is several hundred kilometres upstream of all identified Ramsar wetlands.</p> <p>Further, given the information contained in the referral documentation and the nature and scale of the proposed action and its potential impacts, the proposed action is unlikely to have a significant impact on Ramsar listed Wetlands of International Importance.</p> <p>For these reasons the Department considers that sections 16 and 17B are not controlling provisions for the proposed action.</p>
<p>World Heritage properties (s12 & 15A)</p>	<p>The ERT did not identify any World Heritage properties located within or adjacent to the proposed action area. The nearest World Heritage property is the Great Barrier Reef, located approximately 340 km north-east of the proposed action.</p> <p>Further, given the information contained in the referral documentation, the nature and scale of the proposed action and its potential impacts, and the distance to World Heritage properties, the proposed action is unlikely to have a significant impact on World Heritage properties.</p> <p>For these reasons the Department considers that sections 12 and 15A are not controlling provisions for the proposed action.</p>

<p>National Heritage places (s15B & 15C)</p>	<p>The ERT identified one National Heritage place in the vicinity of the proposed action area (Attachment B). The Tree of Knowledge and Curtilage is located approximately 40 km north-east of the proposed action.</p> <p>Given the information contained in the referral documentation, the nature and scale of the proposed action and its potential impacts, and the distance to the Tree of Knowledge and Curtilage, the proposed action is unlikely to have a significant impact on the National Heritage places.</p> <p>For these reasons the Department considers that sections 15B and 15C are not controlling provisions for the proposed action.</p>
<p>Commonwealth marine environment (s23 & 24A)</p>	<p>The proposed action does not occur in a Commonwealth marine area. The nearest Commonwealth marine environment is located approximately 380 km north-east of the proposed action.</p> <p>Further, given the information contained in the referral documentation, the nature and scale of the proposed action and its potential impacts, and the distance to a Commonwealth marine area, the proposed action is unlikely to have a significant impact on the environment in a Commonwealth marine area.</p> <p>For these reasons the Department considers that sections 23 and 24A are not controlling provisions for the proposed action.</p>
<p>Commonwealth action (s28)</p>	<p>The referring party is not a Commonwealth agency. For this reason the Department considers that section 28 is not a controlling provision for the proposed action.</p>
<p>Commonwealth land (s26 & 27A)</p>	<p>No commonwealth land sites were identified within or adjacent to the proposed action. The closest Commonwealth land site is the Jindalee Transmitting Station, located approximately 70 km east of the proposed action.</p> <p>Further, given the information contained in the referral documentation, the nature and scale of the proposed action and its potential impacts, and the distance to Commonwealth land, the proposed action is unlikely to have a significant impact on the environment on Commonwealth land.</p> <p>For these reasons the Department considers that sections 26 and 27A are not controlling provisions for the proposed action.</p>
<p>Nuclear action (s21 & 22A)</p>	<p>The proposed action does not meet the definition of a nuclear action as defined in the EPBC Act. For this reason the Department considers that sections 21 and 22A are not controlling provisions for the proposed action.</p>

<p>Great Barrier Reef Marine Park (s24B & 24C)</p>	<p>The proposed action is not being undertaken in or near the Great Barrier Reef Marine Park. The Great Barrier Reef Marine Park is located approximately 360 km north-east of the proposed action.</p> <p>Further, given the information contained in the referral documentation, the nature and scale of the proposed action and its potential impacts, and the distance to the Great Barrier Reef Marine Park, the proposed action is unlikely to have a significant impact on the Great Barrier Reef Marine Park.</p> <p>For these reasons the Department considers that sections 24B and 24C are not controlling provisions for the proposed action.</p>
<p>Commonwealth Heritage places overseas (s27B & 27C)</p>	<p>The proposed action is not being taken outside the Australian jurisdiction as defined in the EPBC Act. For this reason the Department considers that sections 27B and 27C are not controlling provisions for the proposed action.</p>
<p>A water resource, in relation to coal seam gas development and large coal mining development (s24D & 24E)</p>	<p>The proposed action is not a coal seam gas or a large coal mining development. For these reasons the Department considers that sections 24D and 24E are not controlling provisions for the proposed action.</p>

SUBMISSIONS:

Public submissions

The proposal was published on the Department's website on 19 July 2019, and public comments were invited until 2 August 2019. Twenty-four public submissions were received on the referral, one of which was received outside of the public comment period ([Attachment C](#)). Twenty-two of these submissions were part of a campaign organised by the Lock the Gate Alliance.

The issues raised in the submissions included the following:

- expansion of the Glenaras gas field and other gas fields in Queensland and the Northern Territory as a result of the GGP, facilitating fracking, groundwater impacts, and carbon emissions;
- potential impacts to watercourses in the project area;
- potential impacts to threatened species and their habitat;
- potential impacts to threatened ecological communities;
- lack of formal consultation with local Indigenous communities; and
- uncertainty over whether the proponent has insurance to cover environmental damage in the event of a pipeline failure.

The Department considers that the issues raised in public comments that are relevant to considerations under the EPBC Act will be addressed during the assessment process.

Comments from Commonwealth Ministers

By letter dated 19 July 2019, the following ministers were invited to comment on the referral:

- Senator the Hon Bridget McKenzie, Minister for Agriculture.

The delegate for the Minister for Agriculture responded on 25 July 2019 and noted that the Department of Agriculture has no comments from a portfolio perspective on whether the proposed action may have significant impacts on any matters of national environmental significance protected under the EPBC Act ([Attachment D](#)).

- Senator the Hon Matt Canavan, Minister for Resources and Northern Australia.

Geoscience Australia responded on 22 July 2019, stating that they are not aware of any geotechnical or geological considerations associated with the proposed pipeline that have the potential to impact on matters protected under the EPBC Act ([Attachment D](#)).

- The Hon Angus Taylor MP, Minister for Energy and Emissions Reduction
- The Hon Ken Wyatt MP, Minister for Indigenous Australians.

No comments were received from the Hon Angus Taylor MP or the Hon Ken Wyatt MP in response to the invitation.

Comments from State/Territory Ministers

By letter dated 19 July 2019, the following State ministers were invited to comment on the referral:

- Mr Chris Loveday, delegate of the Honourable Leanne Enoch, Queensland Minister for Environment and the Great Barrier Reef, Minister for Science and Minister for the Arts.

Mr Chris Loveday responded on 2 August 2019, stating that the proposed action will be assessed under the Bilateral Agreement with Queensland, and that the proponent has been granted approval by the Queensland Department of Environment and Science to prepare a voluntary EIS in accordance with the Bilateral Agreement ([Attachment D](#)).

OTHER MATTERS FOR DECISION-MAKING:

Significant impact guidelines

The Department has reviewed the information in the referral against the *EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance* (December 2013) and other relevant material. While this material is not binding or exhaustive, the factors identified are considered adequate for decision-making in the circumstances of this referral. Adequate information is available for decision-making for this proposal.

Precautionary principle

In making your decision under section 75, you are required to take account of the precautionary principle (section 391). The precautionary principle is that a lack of full scientific certainty should not be used as a reason for postponing a measure to prevent degradation of the environment where there are threats of serious or irreversible environmental damage.

Bioregional Plans

In accordance with section 176(5), you are required to have regard to a bioregional plan in making any decision under the Act to which the plan is relevant.

There is no bioregional plan that is relevant to your decision.

Management Plans for Commonwealth Reserves

In accordance with section 362(2), the Commonwealth or a Commonwealth agency must not perform its functions or exercise its powers in relation to a Commonwealth reserve inconsistently with a management plan that is in operation for the reserve.

There is no Commonwealth reserve management plan that is relevant to your decision.

Cost Recovery

The fee schedule (with justifications) for your consideration is at Attachment E. The fee schedule (without justifications) at Attachment F will be sent to the person taking the action, including an invoice for Stage 1, seeking fees prior to the commencement of any further activity.

s22

A/g Director
Victoria and Tasmania Assessments Section
Assessments and Governance Branch
Ph: s22

s22

Queensland North Assessments Section
Ph: s22

September 2019

ATTACHMENTS

A: Referral

- A1: Overview map
- A2: Project description
- A3: Disturbance area
- A4: Land types
- A5: Desktop Environment Assessment
- A6: Environmental Surveys Report and appendices
- A7: Alternative alignment option overview map
- A8: Alternative alignment option land types
- A9: Hydrology map
- A10: Proposed alignment shapefile
- A11: Mining lease area shapefile
- A12: Indicative coordinates

B: Environmental Reporting Tool (ERT) report, 1 km buffer (dated 28 August 2019)

C: Public comments

D: Ministerial comments

E: Fee schedule (with justifications)

F: Fee schedule (without justifications)

G: Decision notice FOR SIGNATURE

H: Letters to the proponent and other relevant parties FOR SIGNATURE

Quality Assurance Checklist – Referral Brief

Reviewing Officer (may be assessment officer, clearing officer or peer reviewer)

Name: **s22** Signature: **s22** Date: 29/08/2019

Note: Assessment officer to fill out sections shaded YELLOW. Reviewing officer to complete all other sections.

Project: Galilee Gas Pipeline Project, Queensland				
EPBC No: 2019/8484	Assessment officer: Dominica O’Dea	Due Date: 15 August 2019		
General requirements	Brief	Decision Notice	Letters	
	(tick or circle)			
Correct templates used	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Template version numbers: (assessment officer to insert version numbers)	4.3	4.0	4.3	
EPBC reference number correct and used consistently	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Title of the action consistent	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
The ACN (or ABN if no ACN) is listed and correct	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
The designated proponent (CA)/person proposing the action (NCA or NCA-PM) is correct. Needs to be a ‘person’ for the purposes of the EPBC Act.	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>		
Description of the proposal is an accurate reflection of what is in the referral and encompasses all proposed activities	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Statutory deadline consistent with database record	<input checked="" type="checkbox"/>			
Signature blocks and dates are correct	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
List of attachments is correct	<input checked="" type="checkbox"/>			
All dates mentioned accord with records	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
All species references use SPRAT scientific names (first time that they are used)	<input checked="" type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A	<input type="checkbox"/> N/A
Material used to prepare briefing is listed	<input checked="" type="checkbox"/> N/A			
Public comments are included and issues raised in public comments are addressed (s75(1A))	<input checked="" type="checkbox"/> N/A			
Legal advice is included (if advice has been sought)	<input type="checkbox"/> N/A			
Line area advice is included (if advice has been sought)	<input type="checkbox"/> N/A			
All line areas consulted are clearly identified	<input type="checkbox"/> N/A			
Comments from Commonwealth and State/Territory Ministers are included and addressed	<input checked="" type="checkbox"/> N/A			
Additional information requests (stop clocks) are discussed and briefing package and additional information attached	<input type="checkbox"/> N/A			
Current ERT Report included	<input checked="" type="checkbox"/>	Date of ERT Report: <u>28 August 2019</u>		
Compliance, monitoring and auditing fact sheet is attached (for NCA and NCA-PM)	<input type="checkbox"/> N/A			

Identifies the protected matters potentially impacted by the proposed action and provides clear reasons why significant impacts are likely/not likely	<input checked="" type="checkbox"/>			
Recommendations on significance are based on EPBC Act Policy Statement 1.1 Significant Impact Guidelines – Matters of National Environmental Significance (2013) and relevant referral guidelines	<input checked="" type="checkbox"/>			
Considers all adverse impacts the action has, will have or is likely to have on matters protected by each provision of Part 3 ((s.75)(2)(a))	<input checked="" type="checkbox"/>			
Does not consider any beneficial impacts the action has, will have or is likely to have on matter protected by each provision of Part 3 ((s.75)(2)(b))	<input checked="" type="checkbox"/>			
States that the decision maker must take account of the precautionary principle, and the precautionary principle is discussed as appropriate to recommendations of significance	<input checked="" type="checkbox"/>			
Bioregional plans are included and discussed (where relevant)	<input type="checkbox"/>	N/A		
Check listing status of all listed species potentially significantly impacted by the proposed action. Ensure correct listing statuses are used in the brief	<input checked="" type="checkbox"/>	N/A	Date of check against SPRAT: 28 August 2019	
BCD (Species Listing Information & Policy Section) weekly report is consulted to confirm imminent listing events or delistings (if required)	<input checked="" type="checkbox"/>	N/A	Date of weekly report: 23 August 2019	
BCD (Species Listing Information & Policy Section) line area advice included on recent and pending listing decisions (if required)	<input type="checkbox"/>	N/A	Date of advice received:	
NCA-PM decision N/A		Brief	Decision Notice	Letters
Wording of the proposed particular manner(s) clearly describe(s) the way in which the action must be undertaken to avoid significant impacts to protected matters, and accurately reflects the intent in the referral information			<input type="checkbox"/>	
Proposed particular manner(s) checked by Post Approvals Section	<input type="checkbox"/>			
CA decision		Brief	Decision Notice	Letters
All controlling provisions have been identified	<input checked="" type="checkbox"/>		<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
State/territory comments included and addressed where relevant to recommending an appropriate assessment approach (s87(3)(c))	<input checked="" type="checkbox"/>			
Has a recommendation on an approach for assessment (s.87) (do not include where bilateral agreement applies, or decision on assessment approach is deferred)	<input type="checkbox"/>	N/A	<input type="checkbox"/>	N/A
Cost recovery fee schedule included	<input checked="" type="checkbox"/>	N/A		<input checked="" type="checkbox"/>

Galilee Gas Pipeline Project, Queensland (EPBC 2019/8484)
Proposed referral decision briefing package

Document	Name	Document Description	Record Number
Brief	2019-8484 Referral-Brief.docx	FOR SIGNATURE	002971779
QA check	2019-8484 Referral-Brief-QA check.pdf		003031992
Att A	2019-8484 referral.pdf		002915136
Att A1	2019-8484 Referral-Attach-Attachment 1- GGP Overview Map.pdf		
Att A2	2019-8484 Referral-Attach-Attachment 2- GGP Detailed Project Description.pdf		002915062
Att A3	2019-8484 Referral-Attach-Attachment 3- GGP Disturbance Area.pdf		002915353
Att A4	2019-8484 Referral-Attach-Attachment 4- GGP Affected Land.pdf		002915234
Att A5	2019-8484 Referral-Attach-Attachment 5a - CNC Desktop Enviro Constraints Report Prt1.pdf		002916875
Att A5	2019-8484 Referral-Attach-Attachment 5b - CNC Desktop Enviro Constraints Report Prt2.pdf		002917209
Att A5	2019-8484 Referral-Attach-Attachment 5c - CNC Desktop Enviro Constraints Report Prt3.pdf		002915112
Att A5	2019-8484 Referral-Attach-Attachment 5d - CNC Desktop Enviro Constraints Report Prt4.pdf		002915088
Att A6	2019-8484 Referral-Attach-Attachment 6a - Coffey Ecology Report ToC and Executive Summary.pdf		002915348
Att A6	2019-8484 Referral-Attach-Attachment 6b - Coffey Ecology Report Introduction.pdf		002915283
Att A6	2019-8484 Referral-Attach-Attachment 6b - Coffey Ecology Report Methods.pdf		002917198
Att A6	2019-8484 Referral-Attach-Attachment 6c - Coffey Ecology Report Results and Impact Assessment.pdf		002915165
Att A6	2019-8484 Referral-Attach-Attachment 6d - Coffey Ecology Report References.pdf		002915151
Att A6	2019-8484 Referral-Attach-Attachment 6e - 1 Coffey Ecology Report AppendixA GTREs GLP.pdf		002915192
Att A6	2019-8484 Referral-Attach-Attachment 6e - 2 Coffey Ecology Report AppendixA GTREs GGP KP0-100.pdf		002915049
Att A6	2019-8484 Referral-Attach-Attachment 6e - 3 Coffey Ecology Report AppA GTREs GGP KP100-200.pdf		002915339
Att A6	2019-8484 Referral-Attach-Attachment 6e - 4 Coffey Ecology Report AppA GTREs GGP KP200-300.pdf		002915252
Att A6	2019-8484 Referral-Attach-Attachment 6e - 5 Coffey Ecology Report AppA GTREs GGP KP300-400.pdf		002915227
Att A6	2019-8484 Referral-Attach-Attachment 6e - 6 Coffey Ecology Report AppA GTREs GGP KP400-500.pdf		002915386
Att A6	2019-8484 Referral-Attach-Attachment 6f - Coffey Ecology Report AppendixB TECs SEVT.pdf		002915199
Att A6	2019-8484 Referral-Attach-Attachment 6f - Coffey Ecology Report AppendixB TECs.pdf		002915056
Att A6	2019-8484 Referral-Attach-Attachment 6g - Coffey Ecology Report Appendix C Database Searches.pdf		002915156
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Blacksoil Grassland habitat 1.pdf		002917228
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Blacksoil Grassland habitat 2.pdf		002915266
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Blacksoil Grassland habitat 3.pdf		002915068
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Echidna habitat v0 Part1.pdf		002915180
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Echidna habitat v0 Part2.pdf		002915333
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Known Flora Species OVERVIEW v1.pdf		002915259
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Known Threatened Fauna Species OVERVIEW v1.pdf		002915020
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Known threatened species habitat v1 Part 1.pdf		002915289
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Known threatened species habitat v1 Part 2.pdf		002915216
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Potential birds threatened fauna species habitat 1.pdf		002915122
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Potential birds threatened fauna species habitat 2.pdf		002916913
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Potential reptiles species habitat v1 Part 1.pdf		002915243
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Potential reptiles species habitat v1 Part 2.pdf		002915039
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Potential rock dwelling species habitat v1.pdf		002915031
Att A6	2019-8484 Referral-Attach-Attachment 6h- App D Potential threatened fauna species habitat v0.pdf		002915174
Att A6	2019-8484 Referral-Attach-Attachment 6i - Coffey Ecology Report Appendix E Koala Tool.pdf		002915274
Att A6	2019-8484 Referral-Attach-Attachment 6j - Coffey Ecology Report Appendix F Likelihood Assessment.pdf		002915379
Att A6	2019-8484 Referral-Attach-Attachment 6k -Coffey Ecology Report Appendix G Flora Species List.pdf		002915326
Att A6	2019-8484 Referral-Attach-Attachment 6l - Coffey Ecology Report Appendix H Fauna Species List.pdf		002915316
Att A6	2019-8484 Referral-Attach-Attachment 6m - Coffey Ecology Report Appendix I AUSRIVAS.pdf		002915187

Att A6	2019-8484 Referral-Attach-Attachment 6n - Coffey Ecology Report Appendix J ESA Definitions.pdf		002915129
Att A6	2019-8484 Referral-Attach-Attachment 6o - Coffey Ecology Report Appendix K Microbat Report.pdf		002915078
Att A7	2019-8484 Referral-Attach-Attachment 7 - Rolleston Option Overview Map.pdf		002915368
Att A8	2019-8484 Referral-Attach-Attachment 8 GGP Rolleston Option Affected Land LotPlan.pdf		002915142
Att A9	2019-8484 Referral-Attach-GAS-699-MA-EV-001 Hydrology.pdf		002915207
Att A10	2019-8484 Referral-Attach-GGP RevD GLP RevB.zip		002915012
Att A11	2019-8484 Referral-Attach-PSL2033.zip		002915372
Att A12	2019-8484 Referral-Coordinates.docx		002949542
Att B	2019-8484 Referral-Brief-Att B-ERT 1km 20190828.pdf		003028393
Att C	2019-8484 Referral-Email-Comment-ALEC-20190802.msg		002983008
Att C	2019-8484 Referral-Email-Comment-ARRCC-20190802.msg		002982435
Att C	2019-8484 Referral-Email-Comment-s47F -20190801.msg		002982428
Att C	2019-8484 Referral-Email-Comment-s47F J-20190802.msg		002982414
Att C	2019-8484 Referral-Email-Comments47F -20190801.msg		002982177
Att C	2019-8484 Referral-Email-CommentCapricornConservationCouncil-20190802.msg		002983016
Att C	2019-8484 Referral-Email-Comments47F -20190801.msg		002982074
Att C	2019-8484 Referral-Email-Comment-s47F -20190802.msg		002982395
Att C	2019-8484 Referral-Email-Comments47F 20190802.msg		002982251
Att C	2019-8484 Reference-Email-Comment-EnvironmentCentreNT-20190801.msg		002982169
Att C	2019-8484 Referral-Email-Comment-s47F 20190802.msg		002983029
Att C	2019-8484 Referral-Email-Comments47F 20190802.msg		002987246
Att C	2019-8484 Referral-Email-Comment-HoganN-20190802.msg		002983037
Att C	2019-8484 Referral-Email-Comments47F 20190802.msg		002982273
Att C	2019-8484 Referral-Email-Comments47F -20190802.msg		002982187
Att C	2019-8484 Referral-Email-Comment-s47F -20190802.msg		002982242
Att C	2019-8484 Referral-Email-Comment-s47F -20190802.msg		002983054
Att C	2019-8484 Referral-Email-Comment-s47F -20190805.msg	Received outside comment period - 5 August 2019	002995053
Att C	2019-8484 Referral-Email-Comments47F 20190802.msg		002982265
Att C	2019-8484 Referral-Email-Comment-s47F -20190802.msg		002983046
Att C	2019-8484 Referral-Email-Comments47F 20190802.msg		002987250
Att C	2019-8484 Referral-Email-Comment-TheAustraliaInstitute-20190802.msg		002987258
Att C	2019-8484 Referral-Email-Comments47F 0190802.msg		002982405
Att C	2019-8484 Referral-Email-Comment-s47F 20190801.msg		002982091
Att D	2019-8484 Referral-Brief-Att D-Comment Agriculture.msg		002995548
Att D	2019-8484 Referral-Brief-Att D-Comment DES.msg		002995543
Att D	2019-8484 Referral-Brief-Att D-Comment Geoscience Australia.msg		002971747
Att E	2019-8484 Referral-Brief-Att E-Fee schedule justifications.pdf		003017987
Att F	2019-8484 Referral-Brief-Att F-Fee schedule proponent.pdf		003018007
Att G	2019-8484 Referral-Brief-Att G-Decision notice.docx	FOR SIGNATURE	003016961
Att H	2019-8484 Referral-Brief-Att H-Letter DES.docx	FOR SIGNATURE	003016753
Att H	2019-8484 Referral-Brief-Att H-Letter Proponent.docx	FOR SIGNATURE	003016746

Coordinates: Galilee Gas Pipeline, Qld

(Indicative only – refer to PSL2033.zip shapefile data)

-23.069905863352,144.68868182131

-23.068102628586,144.92368648087

-23.566196931963,145.26759282478

-24.017393601511,146.05980329008

-24.876697146056,146.9506845975

-25.559467869476,147.47926417531

-25.75504131061,148.06780168579

-25.710332463126,148.20859142372

-25.69162251533,148.4451682938

-25.803875178815,148.79944996701

-25.93610327147,148.80675460317

-26.185738819552,149.00010250948

-26.011601345731,147.07057498835

-25.145614510867,146.08268388055

-24.4331283817,145.43418826975

-23.895110679916,144.64944859475

-23.069905863352,144.68868182131

EPBC Act Protected Matters Report

This report provides general guidance on matters of national environmental significance and other matters protected by the EPBC Act in the area you have selected. Please see the caveat for interpretation of information provided here.

Galilee Gas Pipeline Project, Qld (2019/8484) - 1km buffer

Report created: 28/08/19 15:12:04

[Summary](#)

[Details](#)

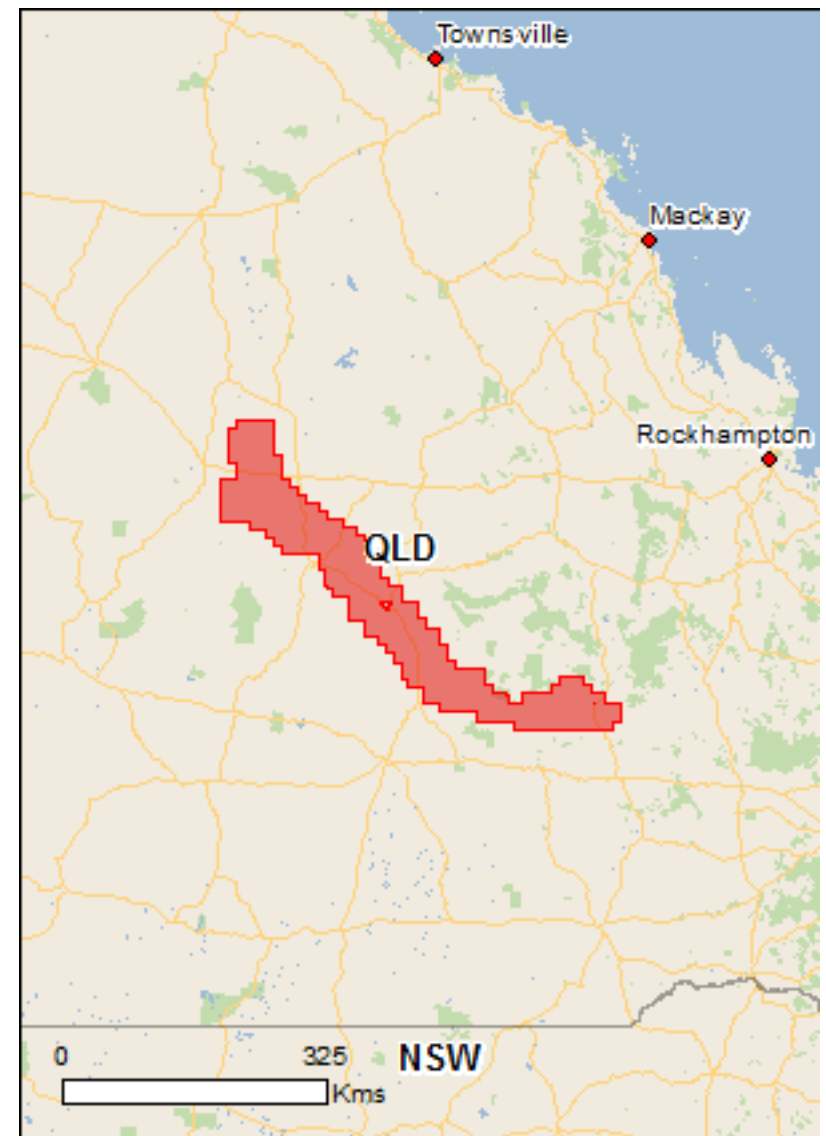
[Matters of NES](#)

[Other Matters Protected by the EPBC Act](#)

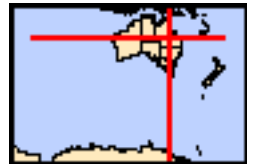
[Extra Information](#)

[Caveat](#)

[Acknowledgements](#)



This map may contain data which are ©Commonwealth of Australia (Geoscience Australia), ©PSMA 2010



Summary

Matters of National Environment Significance

World Heritage Properties:	None
National Heritage Places:	None
Wetlands of International Significance:	6
Great Barrier Reef Marine Park:	None
Commonwealth Marine Area:	None
Threatened Ecological Communities:	7
Threatened Species:	30
Migratory Species:	12

Other Matters Protected by the EPBC Act

Commonwealth Lands:	None
Commonwealth Heritage Places:	None
Listed Marine Species:	17
Whales and Other Cetaceans:	None
Critical Habitats:	None
Commonwealth Reserves Terrestrial:	None
Australian Marine Parks	None

Extra Information

This part of the report provides information that may also be relevant to the area you have

State and Territory Reserves:	2
Regional Forest Agreements:	None
Invasive Species:	30
Nationally Important Wetlands:	None
EPBC Act Referrals:	9
Key Ecological Features (Marine)	None

Details

Matters of National Environmental Significance

Wetlands of International Importance (Ramsar)	[Resource Information]
Name	Proximity
Banrock station wetland complex	1100 - 1200km
Coongie lakes	500 - 600km upstream
Narran lake nature reserve	300 - 400km upstream
Paroo river wetlands	400 - 500km upstream
Riverland	1000 - 1100km
The coorong, and lakes alexandrina and albert wetland	1200 - 1300km

Threatened Ecological Communities [Resource Information]

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

Name	Status	Type of Presence
Brigalow (Acacia harpophylla dominant and co-dominant)	Endangered	Community known to occur within area
Coolibah - Black Box Woodlands of the Darling Riverine Plains and the Brigalow Belt South Bioregions	Endangered	Community likely to occur within area
Poplar Box Grassy Woodland on Alluvial Plains	Endangered	Community may occur within area
Semi-evergreen vine thickets of the Brigalow Belt (North and South) and Nandewar Bioregions	Endangered	Community likely to occur within area
The community of native species dependent on natural discharge of groundwater from the Great Artesian Basin	Endangered	Community likely to occur within area
Weeping Myall Woodlands	Endangered	Community likely to occur within area
White Box-Yellow Box-Blakely's Red Gum Grassy Woodland and Derived Native Grassland	Critically Endangered	Community likely to occur within area

Threatened Species [Resource Information]

Name	Status	Type of Presence
BIRDS		
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Erythrotriorchis radiatus Red Goshawk [942]	Vulnerable	Species or species habitat likely to occur within area
Geophaps scripta scripta Squatter Pigeon (southern) [64440]	Vulnerable	Species or species habitat known to occur within area
Grantiella picta Painted Honeyeater [470]	Vulnerable	Species or species habitat known to occur within area
Neochmia ruficauda ruficauda Star Finch (eastern), Star Finch (southern) [26027]	Endangered	Species or species habitat likely to occur within area
Pedionomus torquatus Plains-wanderer [906]	Critically Endangered	Species or species habitat likely to occur within area
Rostratula australis Australian Painted-snipe, Australian Painted Snipe [77037]	Endangered	Species or species habitat may occur within area
FISH		
Maccullochella peelii Murray Cod [66633]	Vulnerable	Species or species habitat may occur within area

Name	Status	Type of Presence
Mogurnda clivicola Flinders Ranges Mogurnda, Flinders Ranges Purple-spotted Gudgeon [66693]	Vulnerable	Species or species habitat known to occur within area
MAMMALS		
Chalinolobus dwyeri Large-eared Pied Bat, Large Pied Bat [183]	Vulnerable	Species or species habitat likely to occur within area
Dasyurus hallucatus Northern Quoll, Digul [Gogo-Yimidir], Wijingadda [Dambimangari], Wiminji [Martu] [331]	Endangered	Species or species habitat likely to occur within area
Nyctophilus corbeni Corben's Long-eared Bat, South-eastern Long-eared Bat [83395]	Vulnerable	Species or species habitat may occur within area
Petauroides volans Greater Glider [254]	Vulnerable	Species or species habitat may occur within area
Petrogale xanthopus celeris Yellow-footed Rock-wallaby (central-western Queensland) [87608]	Vulnerable	Species or species habitat likely to occur within area
Phascolarctos cinereus (combined populations of Qld, NSW and the ACT) Koala (combined populations of Queensland, New South Wales and the Australian Capital Territory) [85104]	Vulnerable	Species or species habitat known to occur within area
Sminthopsis douglasi Julia Creek Dunnart [305]	Vulnerable	Species or species habitat may occur within area
PLANTS		
Bertya calycina a shrub [78344]	Vulnerable	Species or species habitat may occur within area
Cadellia pentastylis Ooline [9828]	Vulnerable	Species or species habitat known to occur within area
Dichanthium setosum bluegrass [14159]	Vulnerable	Species or species habitat likely to occur within area
Eriocaulon carsonii Salt Pipewort, Button Grass [10584]	Endangered	Species or species habitat likely to occur within area
Eucalyptus virens [10181]	Vulnerable	Species or species habitat likely to occur within area
Sclerolaena walkeri [16152]	Vulnerable	Species or species habitat likely to occur within area
Thesium australe Austral Toadflax, Toadflax [15202]	Vulnerable	Species or species habitat may occur within area
Tylophora linearis [55231]	Endangered	Species or species habitat may occur within area
REPTILES		
Acanthophis hawkei Plains Death Adder [83821]	Vulnerable	Species or species habitat may occur within area
Delma torquata Adorned Delma, Collared Delma [1656]	Vulnerable	Species or species habitat may occur within area
Egernia rugosa Yakka Skink [1420]	Vulnerable	Species or species habitat may occur within area
Elseya albagula Southern Snapping Turtle, White-throated Snapping Turtle [81648]	Critically Endangered	Species or species habitat likely to occur within area

Name	Status	Type of Presence
Furina dunmalli Dunmall's Snake [59254]	Vulnerable	Species or species habitat may occur within area
Rheodytes leukops Fitzroy River Turtle, Fitzroy Tortoise, Fitzroy Turtle, White-eyed River Diver [1761]	Vulnerable	Species or species habitat likely to occur within area

Migratory Species [\[Resource Information \]](#)

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Migratory Marine Birds		
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area

Migratory Terrestrial Species

Cuculus optatus Oriental Cuckoo, Horsfield's Cuckoo [86651]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat may occur within area
Myiagra cyanoleuca Satin Flycatcher [612]		Species or species habitat may occur within area
Rhipidura rufifrons Rufous Fantail [592]		Species or species habitat known to occur within area

Migratory Wetlands Species

Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat may occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area
Gallinago hardwickii Latham's Snipe, Japanese Snipe [863]		Species or species habitat may occur within area
Pandion haliaetus Osprey [952]		Species or species habitat may occur within area

Other Matters Protected by the EPBC Act

Listed Marine Species [\[Resource Information \]](#)

* Species is listed under a different scientific name on the EPBC Act - Threatened Species list.

Name	Threatened	Type of Presence
Birds		
Actitis hypoleucos Common Sandpiper [59309]		Species or species habitat may occur within area
Apus pacificus Fork-tailed Swift [678]		Species or species habitat likely to occur within area

Name	Threatened	Type of Presence
Ardea alba Great Egret, White Egret [59541]		Species or species habitat known to occur within area
Ardea ibis Cattle Egret [59542]		Species or species habitat may occur within area
Calidris acuminata Sharp-tailed Sandpiper [874]		Species or species habitat may occur within area
Calidris ferruginea Curlew Sandpiper [856]	Critically Endangered	Species or species habitat may occur within area
Calidris melanotos Pectoral Sandpiper [858]		Species or species habitat may occur within area
Chrysococcyx osculans Black-eared Cuckoo [705]		Species or species habitat known to occur within area
Gallinago hardwickii Latham's Snipe, Japanese Snipe [863]		Species or species habitat may occur within area
Haliaeetus leucogaster White-bellied Sea-Eagle [943]		Species or species habitat likely to occur within area
Merops ornatus Rainbow Bee-eater [670]		Species or species habitat may occur within area
Motacilla cinerea Grey Wagtail [642]		Species or species habitat may occur within area
Motacilla flava Yellow Wagtail [644]		Species or species habitat may occur within area
Myiagra cyanoleuca Satin Flycatcher [612]		Species or species habitat may occur within area
Pandion haliaetus Osprey [952]		Species or species habitat may occur within area
Rhipidura rufifrons Rufous Fantail [592]		Species or species habitat known to occur within area
Rostratula benghalensis (sensu lato) Painted Snipe [889]	Endangered*	Species or species habitat may occur within area

Extra Information

State and Territory Reserves [\[Resource Information \]](#)

Name	State
Castlevale	QLD
Mount Armour	QLD

Invasive Species [\[Resource Information \]](#)

Weeds reported here are the 20 species of national significance (WoNS), along with other introduced plants that are considered by the States and Territories to pose a particularly significant threat to biodiversity. The following feral animals are reported: Goat, Red Fox, Cat, Rabbit, Pig, Water Buffalo and Cane Toad. Maps from Landscape Health Project, National Land and Water Resources Audit,

Name	Status	Type of Presence
------	--------	------------------

Birds

Anas platyrhynchos Mallard [974]		Species or species habitat likely to occur within area
---	--	--

Name	Status	Type of Presence
Columba livia Rock Pigeon, Rock Dove, Domestic Pigeon [803]		Species or species habitat likely to occur within area
Passer domesticus House Sparrow [405]		Species or species habitat likely to occur within area
Sturnus vulgaris Common Starling [389]		Species or species habitat likely to occur within area
Frogs		
Rhinella marina Cane Toad [83218]		Species or species habitat known to occur within area
Mammals		
Bos taurus Domestic Cattle [16]		Species or species habitat likely to occur within area
Canis lupus familiaris Domestic Dog [82654]		Species or species habitat likely to occur within area
Capra hircus Goat [2]		Species or species habitat likely to occur within area
Equus caballus Horse [5]		Species or species habitat likely to occur within area
Felis catus Cat, House Cat, Domestic Cat [19]		Species or species habitat likely to occur within area
Feral deer Feral deer species in Australia [85733]		Species or species habitat likely to occur within area
Lepus capensis Brown Hare [127]		Species or species habitat likely to occur within area
Mus musculus House Mouse [120]		Species or species habitat likely to occur within area
Oryctolagus cuniculus Rabbit, European Rabbit [128]		Species or species habitat likely to occur within area
Rattus rattus Black Rat, Ship Rat [84]		Species or species habitat likely to occur within area
Sus scrofa Pig [6]		Species or species habitat likely to occur within area
Vulpes vulpes Red Fox, Fox [18]		Species or species habitat likely to occur within area
Plants		
Acacia nilotica subsp. indica Prickly Acacia [6196]		Species or species habitat may occur within area
Asparagus plumosus Climbing Asparagus-fern [48993]		Species or species habitat likely to occur within area
Cenchrus ciliaris Buffel-grass, Black Buffel-grass [20213]		Species or species habitat likely to occur within area
Cryptostegia grandiflora Rubber Vine, Rubbervine, India Rubber Vine, India Rubbervine, Palay Rubbervine, Purple Allamanda [18913]		Species or species habitat likely to occur within area

Name	Status	Type of Presence
Jatropha gossypifolia Cotton-leaved Physic-Nut, Bellyache Bush, Cotton-leaf Physic Nut, Cotton-leaf Jatropha, Black Physic Nut [7507]		Species or species habitat likely to occur within area
Lantana camara Lantana, Common Lantana, Kamara Lantana, Large-leaf Lantana, Pink Flowered Lantana, Red Flowered Lantana, Red-Flowered Sage, White Sage, Wild Sage [10892]		Species or species habitat likely to occur within area
Lycium ferocissimum African Boxthorn, Boxthorn [19235]		Species or species habitat likely to occur within area
Opuntia spp. Prickly Pears [82753]		Species or species habitat likely to occur within area
Parkinsonia aculeata Parkinsonia, Jerusalem Thorn, Jelly Bean Tree, Horse Bean [12301]		Species or species habitat likely to occur within area
Parthenium hysterophorus Parthenium Weed, Bitter Weed, Carrot Grass, False Ragweed [19566]		Species or species habitat likely to occur within area
Prosopis spp. Mesquite, Algaroba [68407]		Species or species habitat likely to occur within area
Solanum elaeagnifolium Silver Nightshade, Silver-leaved Nightshade, White Horse Nettle, Silver-leaf Nightshade, Tomato Weed, White Nightshade, Bull-nettle, Prairie-berry, Satansbos, Silver-leaf Bitter-apple, Silverleaf-nettle, Trompillo [12323]		Species or species habitat likely to occur within area
Vachellia nilotica Prickly Acacia, Blackthorn, Prickly Mimosa, Black Piquant, Babul [84351]		Species or species habitat likely to occur within area

EPBC Act Referrals [\[Resource Information \]](#)

Further details about the referral or advice - including its current status if still active - are available in its PINK report; click on the title.

Referral			
Title	Reference	Referral Outcome	Assessment Status
Ballera Lateral Gas Pipeline	2006/2563		Withdrawn-Completed
Comet Ridge to Wallumbilla natural gas pipeline	2006/2604	NCA	Referral Decision Made-Completed
High Voltage Transmission line Development	2007/3230	NCA	Referral Decision Made-Completed
Coal Seam Gas Field Development for Natural Gas Liquefaction Park, Curtis Island	2008/4059	CA	Approval Decision Made-Post-Approval
Future Gas Supply Area Project	2012/6357		Withdrawn-Completed
Santos GLNG Gas Field Development Project, QLD	2012/6615	CA	Approval Decision Made-Post-Approval
Cooper to Abbot Point liquid natural gas (LNG) facility, Capling Project, QLD	2014/7175	CA	S89 - Awaiting Information-Referral Decision
Western Surat Gas Project, Surat Basin, Qld	2015/7469	CA	Approval Decision Made-Post-Approval
Improving rabbit biocontrol: releasing another strain of RHDV, sthrn two thirds of Australia	2015/7522	NCA	Referral Decision Made-Completed

Caveat

The information presented in this report has been provided by a range of data sources as acknowledged at the end of the report.

This report is designed to assist in identifying the locations of places which may be relevant in determining obligations under the Environment Protection and Biodiversity Conservation Act 1999. It holds mapped locations of World and National Heritage properties, Wetlands of International and National Importance, Commonwealth and State/Territory reserves, listed threatened, migratory and marine species and listed threatened ecological communities. Mapping of Commonwealth land is not complete at this stage. Maps have been collated from a range of sources at various resolutions.

Not all species listed under the EPBC Act have been mapped (see below) and therefore a report is a general guide only. Where available data supports mapping, the type of presence that can be determined from the data is indicated in general terms. People using this information in making a referral may need to consider the qualifications below and may need to seek and consider other information sources.

For threatened ecological communities where the distribution is well known, maps are derived from recovery plans, State vegetation maps, remote sensing imagery and other sources. Where threatened ecological community distributions are less well known, existing vegetation maps and point location data are used to produce indicative distribution maps.

For species where the distributions are well known, maps are digitised from sources such as recovery plans and detailed habitat studies. Where appropriate, core breeding, foraging and roosting areas are indicated under 'type of presence'. For species whose distributions are less well known, point locations are collated from government wildlife authorities, museums, and non-government organisations; bioclimatic distribution models are generated and these validated by experts. In some cases, the distribution maps are based solely on expert knowledge.

Threatened, migratory and marine species distributions have been derived through a variety of methods. Where distributions are well known and if time permits, maps are derived using either thematic spatial data (i.e. vegetation, soils, geology, elevation, aspect, terrain, etc) together with point locations and described habitat; or environmental modelling (MAXENT or BIOCLIM habitat modelling) using point locations and environmental data layers.

Where very little information is available for species or large number of maps are required in a short time-frame, maps are derived either from 0.04 or 0.02 decimal degree cells; by an automated process using polygon capture techniques (static two kilometre grid cells, alpha-hull and convex hull); or captured manually or by using topographic features (national park boundaries, islands, etc). In the early stages of the distribution mapping process (1999-early 2000s) distributions were defined by degree blocks, 100K or 250K map sheets to rapidly create distribution maps. More reliable distribution mapping methods are used to update these distributions as time permits.

Only selected species covered by the following provisions of the EPBC Act have been mapped:

- migratory and
- marine

The following species and ecological communities have not been mapped and do not appear in reports produced from this database:

- threatened species listed as extinct or considered as vagrants
- some species and ecological communities that have only recently been listed
- some terrestrial species that overfly the Commonwealth marine area
- migratory species that are very widespread, vagrant, or only occur in small numbers

The following groups have been mapped, but may not cover the complete distribution of the species:

- non-threatened seabirds which have only been mapped for recorded breeding sites
- seals which have only been mapped for breeding sites near the Australian continent

Such breeding sites may be important for the protection of the Commonwealth Marine environment.

Acknowledgements

This database has been compiled from a range of data sources. The department acknowledges the following custodians who have contributed valuable data and advice:

- [-Office of Environment and Heritage, New South Wales](#)
- [-Department of Environment and Primary Industries, Victoria](#)
- [-Department of Primary Industries, Parks, Water and Environment, Tasmania](#)
- [-Department of Environment, Water and Natural Resources, South Australia](#)
- [-Department of Land and Resource Management, Northern Territory](#)
- [-Department of Environment and Heritage Protection, Queensland](#)
- [-Department of Parks and Wildlife, Western Australia](#)
- [-Environment and Planning Directorate, ACT](#)
- [-Birdlife Australia](#)
- [-Australian Bird and Bat Banding Scheme](#)
- [-Australian National Wildlife Collection](#)
- Natural history museums of Australia
- [-Museum Victoria](#)
- [-Australian Museum](#)
- [-South Australian Museum](#)
- [-Queensland Museum](#)
- [-Online Zoological Collections of Australian Museums](#)
- [-Queensland Herbarium](#)
- [-National Herbarium of NSW](#)
- [-Royal Botanic Gardens and National Herbarium of Victoria](#)
- [-Tasmanian Herbarium](#)
- [-State Herbarium of South Australia](#)
- [-Northern Territory Herbarium](#)
- [-Western Australian Herbarium](#)
- [-Australian National Herbarium, Canberra](#)
- [-University of New England](#)
- [-Ocean Biogeographic Information System](#)
- [-Australian Government, Department of Defence](#)
- [-Forestry Corporation of NSW](#)
- [-Australian Tropical Herbarium, Cairns](#)
- [-eBird Australia](#)
- [-Australian Government – Australian Antarctic Data Centre](#)
- [-Museum and Art Gallery of the Northern Territory](#)
- [-Australian Government National Environmental Science Program](#)
- [-Australian Institute of Marine Science](#)
- [-Reef Life Survey Australia](#)
- [-American Museum of Natural History](#)
- [-Queen Victoria Museum and Art Gallery, Inveresk, Tasmania](#)
- [-Tasmanian Museum and Art Gallery, Hobart, Tasmania](#)
- Other groups and individuals

The Department is extremely grateful to the many organisations and individuals who provided expert advice and information on numerous draft distributions.

From: s47F
To: [EPBC.comments](#)
Cc: [ALEC.Director](#)
Subject: GGP ALEC Submission
Date: Friday, 2 August 2019 3:32:35 PM
Attachments: [ALEC.Submission.Galilee.Gas.Pipeline.pdf](#)

Dear Environment Assessment Branch,

Attached is a submission from the Arid Lands Environment Centre on the proposed Galilee Gas Pipeline proposed by Jemena (2019/8484).

Warm regards,

s47F

Policy Officer
Arid Lands Environment Centre (ALEC)

Ph. s47F

'Healthy futures for arid lands and people'

Street Address: 90 Gap Rd, The Gap, Alice Springs
Postal Address: PO 2796, Alice Springs, NT, 0871
Web: www.alec.org.au
Facebook: <http://www.facebook.com/pages/Arid-Lands-Environment-Centre/>



Office: 90 Gap Road Alice Springs NT
Mail: PO Box 2796 Alice Springs 0870 NT
Web: www.alec.org.au
Phone: 08 89522497
Email: policy@alec.org.au

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

ALEC Submission on the Galilee Gas Pipeline

Please accept this submission on behalf of the Arid Lands Environment Centre to the EPBC referral for the GGP proposed by Jemena (2019/8484).

The Arid Lands Environment Centre (ALEC), located in Alice Springs, Northern Territory, is central Australia's peak environmental organisation that has been advocating for the protection of nature and ecologically sustainable development for the arid lands since 1980. ALEC is actively engaged in community engagement and policy consultation for major pipeline and energy projects throughout the NT.

The Galilee Gas Pipeline (GGP) will have profound environmental and market implications for petroleum exploration and production in the Northern Territory. It would facilitate the development of onshore gas projects in the NT through the expansion of the NGP. As these pipelines and petroleum activities are widely acknowledged to pose significant environmental risks, the GGP is a serious concern for ALEC and our members.

Objection to the project

We ultimately submit that the risks posed by this project are unacceptable because of the scale of biological, water and climate impacts. Approval for the project should be refused in order to protect matters of national environmental significance. In the alternative, the project should be assessed through an environmental impact statement (EIS) to properly identify, evaluate and mitigate the significant environmental risks.

Crucially, we note that Jemena does not recognise the impact to water resources necessitating EIS assessment through the EPBC Act.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

This submission will outline why the project should be assessed through an EIS as its impacts on water resources render it a controlled action.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

- “(a) the action involves:
- (i) coal seam gas development; or
 - (ii) large coal mining development; and
- (b) the action:
- (i) has or will have a significant impact on a water resource; or
 - (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’.

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is 'sufficiently proximate that it can be said to involve the extraction of CSG', would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that an EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological communities in detail. It is also important to note that the project plans to cross 18 watercourses that have very high ecological importance.

The impacts on ecological and threatened species communities warrants assessment through an EIS process. Unless this thorough assessment is undertaken, there is a very real possibility that risks to MNES will not be properly identified and therefore unable to be mitigated to an acceptable level.

³ NB The guidelines actually frame the proposition in the negative, as follows *'The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource'*

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: ARRCC submission on gas pipeline [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:23:57 AM
Attachments: [ARRCC submission on gas pipeline.docx.pdf](#)

From: s47F [mailto:s47F]

Sent: Thursday, 1 August 2019 3:30 PM

To: EPBC Referrals

Subject: ARRCC submission on gas pipeline

Referrals Gateway

Environment Assessment Branch

Department of the Environment

GPO Box 787

Canberra ACT 2601

By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Please accept this submission on behalf of the Australian Religious Response to Climate Change to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

Our basic position is that there should be no new gas “exploration” or mining on the grounds that gas is another fossil fuel with its attendant greenhouse gas emissions when burnt. It is highly unethical in our current climate emergency to continue opening up new gas mines when there are alternative renewable forms of energy.

In terms of existing regulatory frameworks, we urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Gas is a fossil fuel

There should be a halt to exploration and extraction of Coal Seam Gas (CSG), other ‘tight’ (or ‘unconventional’) and ‘conventional’ (or ‘natural’) fossil gases. This is because fossil gas is a fossil fuel and fossil fuels are a primary cause of global warming. Society needs to shift directly to renewable energy sources as quickly as possible if we are to avoid the worst of global warming. As Pope Francis says in *Laudato Si*, “There is an urgent need to develop policies so that, in the next few years, the emission of carbon dioxide and other highly polluting gases can be drastically reduced, for example, substituting for fossil fuels and developing sources of renewable energy.” (para. 26) Gas being seen as a transition fuel delays this shift. Indeed when fugitive emissions (escaped unburnt and highly potent gas) are taken into the account, gas is little or no better than other fossil fuels and may even be worse, as there is mounting evidence to suggest levels of fugitive emissions from all gas extraction and transmission may be higher than originally claimed.

Furthermore, CSG extraction using hydraulic fracturing (‘fracking’) has a range of other local adverse impacts. These include:

- loss and fragmentation of habitat for native species, and animals dying because they drink from abandoned toxic ponds;
- pollution of water and soil resources (both on the surface and under the ground), with associated threats to agriculture and food supply;
- damage to local people’s health, livelihoods and communities; and
- increased risk of fire, both from gas and its flaring and from drying of local soils and vegetation as a result of clearing, and lowering of water tables.
- fragmentation of and limiting access to and use of farming and pasture lands

Overall, there is serious doubt about the claim that gas from CSG is any better environmentally than coal.

Water Resources

Governments let their people down when there is insufficient recognition of the vital need for water for communities to survive long-term, in rural areas, towns and cities. Australia is already a dry continent and climate change is causing further drying in some regions.

We **endorse the research of Lock the Gate and their assessment** of the inadequacy of measures so far to consider impacts on water. It is copied below.

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the [action](#) involves:

(i) [coal seam gas development](#); or

(ii) [large coal mining development](#); and

(b) the [action](#):

(i) has or will have a significant [impact](#) on a [water resource](#); or

(ii) is likely to have a significant [impact](#) on a [water resource](#). “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant [impact](#) on [water resources](#) (including any [impacts](#) of associated salt production and/or salinity):

(a) in its own right; or

(b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a *binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.^[1]

The Bills digest^[2] from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘*CSG is composed mostly of methane(CH4) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*’.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘*sufficiently proximate that it can be said to involve the extraction of CSG*’, would need to be referred^[3] - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

In conclusion

Our generation must begin acting properly as stewards of Australia's natural environment, and not take for granted that it will continue to provide for our needs, regardless of our continuing rapacious exploitation and reckless pollution. Of all sectors of society, governments are most responsible to protect the climate and water resources. To date, governments (both State and Federal) have entirely under-performed in relation to the needs of our children and their children for a safe environment. It is to be applauded that, in the School Climate Strikes, the young are expressing their disapproval at our generation's collective irresponsibility. To extrapolate, our generation and especially our political leaders, **must change from business-as-usual** if we are to avoid being judged harshly by generations coming after us.

s47F

Australian Religious Response to Climate Change

264 Pitt St
Sydney. NSW. 2000.

Ph: s47F

M: s47F

E s47F

W: www.arrcc.org.au

"Love, overflowing with small gestures of mutual care, is also civic and political, and it makes itself felt in every action that seeks to build a better world." Pope Francis, *Laudato Si'*, para. 231

[1] EPBC Act ss 82, 136, 528

[2] [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

[3] NB The guidelines actually frame the proposition in the negative, as follows *'The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource'*

Aug 1, 2019

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

FOI 191017
Document 7a

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of the Australian Religious Response to Climate Change to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

Our basic position is that there should be no new gas “exploration” or mining on the grounds that gas is another fossil fuel with its attendant greenhouse gas emissions when burnt. It is highly unethical in our current climate emergency to continue opening up new gas mines when there are alternative renewable forms of energy.

In terms of existing regulatory frameworks, we urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Gas is a fossil fuel

There should be a halt to exploration and extraction of Coal Seam Gas (CSG), other ‘tight’ (or ‘unconventional’) and ‘conventional’ (or ‘natural’) fossil gases. This is because fossil gas is a fossil fuel and fossil fuels are a primary cause of global warming. Society needs to shift directly to renewable energy sources as quickly as possible if we are to avoid the worst of global warming.

As Pope Francis says in *Laudato Si'*, “There is an urgent need to develop policies so that, in the next few years, the emission of carbon dioxide and other highly polluting gases can be drastically reduced, for example, substituting for fossil fuels and developing sources of renewable energy.” (para. 26)

Gas being seen as a transition fuel delays this shift. Indeed when fugitive emissions (escaped unburnt and highly potent gas) are taken into the account, gas is little or no better than other fossil fuels and may even be worse, as there is mounting evidence to suggest levels of fugitive emissions from all gas extraction and transmission may be higher than originally claimed.

Furthermore, CSG extraction using hydraulic fracturing (‘fracking’) has a range of other local adverse impacts. These include:

- loss and fragmentation of habitat for native species, and animals dying because they drink from abandoned toxic ponds;
- pollution of water and soil resources (both on the surface and under the ground), with associated threats to agriculture and food supply;
- damage to local people’s health, livelihoods and communities; and
- increased risk of fire, both from gas and its flaring and from drying of local soils and vegetation as a result of clearing, and lowering of water tables.
- fragmentation of and limiting access to and use of farming and pasture lands

Overall, there is serious doubt about the claim that gas from CSG is any better environmentally than coal.

Water Resources

Governments let their people down when there is insufficient recognition of the vital need for water for communities to survive long-term, in rural areas, towns and cities. Australia is already a dry continent and climate change is causing further drying in some regions.

We **endorse the research of Lock the Gate and their assessment** of the inadequacy of measures so far to consider impacts on water. It is copied below:

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

- “(a) the [action](#) involves:
- (i) [coal seam gas development](#); or
 - (ii) [large coal mining development](#); and
- (b) the [action](#):
- (i) has or will have a significant [impact](#) on a [water resource](#); or
 - (ii) is likely to have a significant [impact](#) on a [water resource](#). “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant [impact](#) on [water resources](#) (including any [impacts](#) of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a *binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties. The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘*CSG is composed mostly of methane(CH4) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*’.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘*sufficiently proximate that it can be said to involve the extraction of CSG*’, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows ‘*The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource*’

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

In conclusion

Our generation must begin acting properly as stewards of Australia's natural environment, and not take for granted that it will continue to provide for our needs, regardless of our continuing rapacious exploitation and reckless pollution. Of all sectors of society, governments are most responsible to protect the climate and water resources. To date, governments (both State and Federal) have entirely under-performed in relation to the needs of our children and their children for a safe environment. It is to be applauded that, in the School Climate Strikes, the young are expressing their disapproval at our generation's collective irresponsibility. To extrapolate, our generation and especially our political leaders, **must change from business-as-usual** if we are to avoid being judged harshly by generations coming after us.

s47F

s47F

s47F ARRCC

From: s47F
To: [EPBC.comments](#)
Subject: Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd Reference Number: 2019/8484
Date: Thursday, 1 August 2019 2:35:52 PM
Attachments: [Submission Jemena Galilee Gas Project July 2019 .pdf](#)

Dear Sir/ Madam,

Please accept the attached submission on behalf of Mackay Conservation Group, to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

Regards,

s47F

- Mackay Conservation Group

Phone s47F
156 Wood St,
Mackay, QLD 4740



Mackay Conservation Group

FOI 191017
Document 8a

The Environment Centre
156 Wood St, Mackay
PO BOX 826
Mackay Qld 4740

Tel: (07) 4953 0808

Email: admin@mackayconservationgroup.org.au

Web: www.mackayconservationgroup.org.au

ABN: 41 123 903 975

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Dear Sir/ Madam,

I am authorised to make this submission on behalf of the Mackay Conservation Group.

Please accept this submission on behalf of Mackay Conservation Group, to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

Mackay Conservation Group is a non-profit environmental organisation that operates in the Mackay-Whitsunday-Isaac Region of Queensland. We have been campaigning for protection of our region's biodiversity since the group was formed in 1984. Our mission is to promote awareness of the value of our natural environment and represent people's desires to protect and maintain our region's natural assets.

We achieve this by education, research, advocacy and action in co-operation with other community groups, industry, and government. Mackay Conservation Group is often consulted by government and non-government organisations in relation to issues such as port management, mine rehabilitation, mining exploration, reef research, waterway rehabilitation, transport improvements and many other issues.

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species, communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘sufficiently proximate that it can be said to involve the extraction of CSG’, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River.

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows ‘The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource’

This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

We hope you take these important points into consideration,

Regards,

s47F

s47F

Mackay Conservation Group

156 Wood St, Mackay QLD 4740

Phone s47F

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:23:41 AM

From: s47F

Sent: Thursday, 1 August 2019 3:06 PM

To: EPBC Referrals

Subject: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Referrals Gateway

Environment Assessment Branch

Department of the Environment

GPO Box 787

Canberra ACT 2601

By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Please accept this submission on behalf of Lock the Gate Alliance to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the [action](#) involves:

(i) [coal seam gas development](#); or

(ii) [large coal mining development](#); and

(b) the [action](#):

(i) has or will have a significant [impact](#) on a [water resource](#); or

(ii) is likely to have a significant [impact](#) on a [water resource](#). “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant [impact](#) on [water resources](#) (including any [impacts](#) of associated salt production and/or salinity):

(a) in its own right; or

(b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.^[1]

The Bills digest^[2] from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘*CSG is composed mostly of methane(CH4) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*’.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘*sufficiently proximate that it can be said to involve the extraction of CSG*’, would need to be referred^[3] - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that ‘*the key MNES that are likely to be affected by the*

GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

[1] EPBC Act ss 82, 136, 528

[2] [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

[3] NB The guidelines actually frame the proposition in the negative, as follows *'The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource'*

Regards

s47F



Virus-free. www.avast.com

From: s47F
To: [EPBC.comments](#)
Subject: 2019/8484 - JEMENA NORTHERN GAS PIPELINE PTY LTD/Energy Generation and Supply (non-renewable)/Multiple Lots -Refer to Attachment for List of Land (and Lot/Plan)/Queensland/Galilee Gas Pipeline Project, Qld
Date: Thursday, 1 August 2019 11:03:01 PM
Attachments: s47F [Public Comment 2019_8484.docx](#)
[uwir-2019 Water Impacts.pdf](#)

Dear Sir

Please find attached my comments and supporting documents.

Sincerely

s47F
[Redacted]
[Redacted]
[Redacted]

Referrals Gateway
Assessment & Governance Branch
Department of the Environment and Energy
GPO Box 787
Canberra ACT 2601

01/08/2019

Dear Sir

I wish to make public comment on Jemena Application No 2019/8484 Galilee Gas Pipeline Project.

I object to this project going ahead because it will have both direct and indirect impacts to water. Direct impacts because it is to be constructed through a vast number of major watercourses (and many more minor ones) which experience both floods and droughts. Indirect impacts because the pipeline will be the catalyst for the drilling of thousands of gas wells. The Underground Water Impact Report for the Surat Cumulative Management Area (2019 draft attached) shows there have been significant impacts to groundwater since the Queensland gas fields started. Water drawdowns in areas subject to increasingly frequent drought are not to be taken lightly. I would expect that Jemena would need to estimate how many wells in the various States are going to be required to fill it's pipeline so that an estimate of water impacts can be made. The application states

2.9 Is the proposed action likely to have ANY direct or indirect impact on a water resource related to coal/gas/mining?

No

I also object because of the impact to threatened species and to unthreatened species and flora mentioned in the application. Koalas especially.

I object because although the application states that Jemena met with many stakeholders and had many ways that the community could contact them it also states that there has been no formal consultation with the First Nations people. I find this appalling that Jemena contacted all the people as per the snip below, but is waiting to talk to the traditional owners in due course.

Consultation with Indigenous stakeholders will form a key component of Jemena's GGP Project engagement program. Formal engagements are yet to commence, however Indigenous stakeholders will be engaged early in the planning process (prior to submission of the Draft EIS Terms of Reference) to allow Jemena introduce the GGP Project, and understand any key concerns. Jemena will also engage with Indigenous stakeholders as it undertakes the EIS social impact assessment, and as required under the Aboriginal Cultural Heritage Act 2003 (Qld), and the Native Title Act 1993 (Cth).

In October 2017, Jemena signed a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market. From this time, Jemena has carried out significant engagement with its Project stakeholders, including those in the Project area. These engagements includes face to face meetings with all affected landholders, elected representatives, local Councils and ongoing engagement with relevant State and Commonwealth Government departments. The aim of this early engagement was to ensure stakeholders were aware of the GGP Project, its drivers and to understand their key concerns.

You would be aware that the traditional owners have never ceded their lands, Native Title is a colonialist construct and these people should have been the first people consulted. Not the last. I believe this project will have negative cultural impacts to Country.

I am not sure this project won't become a stranded asset. Renewables are cheaper and create less greenhouse gases. This project will contribute to the Climate Crisis that 97-99% of Climate Scientists agree is causing and will cause massive environmental harm.

I also note that Jemena doesn't mention that it would have insurance to cover environmental damage caused by a pipeline explosion. I would think this would have to be undertaken in relation to each landholder and Local Council.

Thank you for considering these points. I note I only became aware today that comments could be made so haven't had a chance to read all the supporting docs.

This might be an application for just a bit of pipeline, but it is part of a much larger puzzle. I think the whole puzzle impacts should be looked at. I note I am compiling a submission on an APLNG application to allow fracking of 940 wells near Injune. This form mentions extending the pipeline to Mt Isa. Cumulative impacts.

Sincerely

s47F

[Redacted signature block]

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Galilee Gas Pipeline Project Reference Number: 2019/8484 [SEC=OFFICIAL]
Date: Friday, 2 August 2019 3:00:32 PM
Attachments: [CCC_GalileeGasPipeline_Submission_August_2019.pdf](#)

From: ccc@cccqld.org.au [mailto:ccc@cccqld.org.au]

Sent: Friday, 2 August 2019 1:08 PM

To: EPBC Referrals

Subject: Galilee Gas Pipeline Project Reference Number: 2019/8484

To whom it may concern,

Please find attached our submission in relation to the Galilee Gas Pipeline Project, Reference Number: 2019/8484.

If you have any further queries, please contact me at s47F .

Regards,

s47F

Capricorn Conservation Council | A voice for the environment

Haigh Park, Cnr North & Livermore Streets | PO Box 4011 ROCKHAMPTON QLD 4700

Phone: s47F | Email: ccc@cccqld.org.au | Website: www.cccqld.org.au

Capricorn Conservation Council acknowledges the Australian Aboriginal and Torres Strait Islander peoples as the first inhabitants of the nation and the traditional custodians of the lands where we live, learn and work. We acknowledge the Darumbal custodians of the lands on which our office is located and where we conduct our business and pay our respects to ancestors and Elders, past and present.

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena
Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Thank you for the opportunity to make a submission to the above project. This submission is made on behalf of Capricorn Conservation Council, Rockhampton, Queensland.

Since 1973 Capricorn Conservation Council (CCC) has performed an important role in providing environmental advocacy and community conservation education. Our work is mainly through volunteers and our engagement covers schools, general community, industry and government.

CCC participates in numerous community, government and industry forums, a small sample includes:

- Environment and Heritage Protection Ministerial Roundtable
- Central Queensland Mine Rehabilitation Group
- Shoalwater Bay Training Area Environmental Advisory Committee
- Fitzroy Water Quality Advisory Group (EHP/DNRM)
- Fitzroy Partnership for River Health
- Project and EIS panels, consultative meetings and reports for wildlife and ecology.

CCC has an issue regarding the proponent Jemena not recognising water resources as a controlling provision.

We urge you to recognise the Galilee Gas Pipeline (GGP) as a controlled action under the EPBC Act, with the dual controlling

provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

CCC considers the GGP should be a controlled action for water resources because it is a part of a coal seam gas development and it is likely to have significant impacts on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The

proponent states in their referral that they have signed *'a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market'* (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters.

There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows *'CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site'*.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be use in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is *'sufficiently proximate that it can be*

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

said to involve the extraction of CSG', would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources.

The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo, Maranoa and Warrego Rivers.

This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*.

We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and

³ NB The guidelines actually frame the proposition in the negative, as follows *'The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource'*



A voice for the environment

to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Thank you for your consideration of my submission. Should you require any further information, please do not hesitate to contact us.

Sincerely

s47F

Capricorn Conservation Council

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Subject: FW: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd Reference Number: 2019/8484 [SEC=OFFICIAL]
Date: Thursday, 1 August 2019 2:19:47 PM
Attachments: [ECoCeQ letterhead.docx](#)

From: s47F
Sent: Thursday, 1 August 2019 2:10 PM
To: EPBC Referrals
Subject: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd Reference Number: 2019/8484

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601

By email: epbc.referrals@environment.gov.au

RE: **Proposed Action:** Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Please see the attached submission from the Environment Council of Central Queensland (ECoCeQ) for your consideration.

I look forward to your response,
Yours sincerely,

s47F

Environment Council of Central Queensland
s47F



Environment Council of Central Queensland Inc.

ABN 56 740 735 001
P.O. Box 1399 Mackay 4740
Ph. 0411 554 761

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of the Environment Council of Central Queensland (ECoCeQ) to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

ECoCeQ was incorporated in 2014, and has taken a keen interest in the Jemena group activities since 2015 when they proposed the North East Gas Interconnector Pipeline Tennant Creek (NT) to Mt Isa (QLD) EPBC2015/7569. We remain concerned about this new proposal to facilitate the development of coal seam gas production in the Galilee Basin.

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or*
- (ii) large coal mining development; and*

(b) the action:

- (i) has or will have a significant impact on a water resource; or*
- (ii) is likely to have a significant impact on a water resource. “*

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

(a) in its own right; or

(b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘sufficiently proximate that it can be said to involve the extraction of CSG’, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning*

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows ‘The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource’

Interests Act 2014 (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, J*

ulia creek dunnart and the plains death adder'. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Climate Change

The GGP should be a controlled action for climate change, gas extraction, gas burning and related environmental, social and economic impacts for the development of gas in Northern Australia. The referral does not reveal the capacity or diameter of the GGP. Even without this baseline, the referral anticipates 'future increased capacity' (p1). The GGP has an expected operational life of 42 years from 01/2022 to 12/2063.

However, as planned in the referral the 40m construction ROW suggests the GGP will be at least 700 TJ/day.

Page 8 of the referral states:

Jemena is currently investigating a potential expansion of the Northern Gas Pipeline (NGP) in the event commercially [sic] viable sources of gas in the Northern Territory are proven. Per the current proposal (and action per this referral), Jemena is proposing that a larger diameter pipeline (Mainline) be constructed in a 40m Construction ROW to negate future looping of the GGP. In the event commercially viable quantities of gas are not proven in the Northern Territory, and the NGP expansion does not proceed, then the GGP will be constructed in a 40m Construction ROW (and pipeline to be the same diameter as the lateral).

If commercially viable volumes of gas are proven in the Northern Territory, in addition to the larger diameter GGP, Jemena will seek to expand the NGP via construction of a large diameter buried gas pipeline between Mt Isa and the Longreach Scraper Station (expanding and connecting the NGP and GGP), providing the most efficient transport of large volumes of gas from the Northern Territory to the wider east coast gas market.

For the purpose of this EPBC Act Referral, the GGP and proposed NGP expansion are considered as separate actions under a staged development, with the GGP being Stage 1 (transporting gas from the Galilee Basin) and constructed well in advance of the proposed Stage 2 (the NGP expansion, transporting gas from the Northern Territory).

The NGP expansion (Stage 2), will be subject to a separate EPBC Act referral and State approvals once there is greater project definition and confidence in the gas resources in the Northern Territory.

As stated in the referral, the Galilee Energy Glenaras Gas Project is highly prospective for coal seam gas (CSG) with an independently certified 3C Contingent Resource of more than 5,300 PJ. The GGP will facilitate to a major extent significant upstream and downstream impacts. The GGP facilitates to a major extent not only the Glenaras Gas Project, but also the expansion and extension of the NGP and the gas extraction in the Northern Territory.

The description of the binding agreement between the Proponent and Galilee Energy (p6) in Galilee Energy Limited's 17 October 2017 ASX announcement *Galilee Energy and Jemena fast-track plans to connect Galilee Basin to the East Coast gas market*⁴ refers to significant gas fields and that the GGP will enable the delivery of gas from NT gas fields:

Galilee Energy Managing Director, Peter Lansom explained, "Galilee Energy has one of the largest uncontracted Contingent Gas Resources on the east coast"...

The project is another key step in Jemena's plans to expand and extend its Northern Gas Pipeline, via the Galilee Basins, to the largest gas markets on the east coast,

The GGP and NGP cannot be considered separate actions under a staged development. The current proposal and action is dependent on construction of an expanded NGP from 90TJ to 700TJ, and the extension of the NGP from Mt Isa to Longreach.

The larger action is the extraction and transportation of commercially viable quantities of gas.

The description of the MOU between Galilee Energy and Jemena states:

The project is another key step in Jemena's plans to expand and extend its Northern Gas Pipeline, via the Galilee Basin, to the largest gas markets on the east coast.

Jemena has stated about the extent of gas in the NT in documents published to the Singapore Stock Exchange (SGSPAA May 2018 Offering Circular p117):

In addition to the current [1000 PJ of] 2P reserves, the NT has large prospective shale gas reserves totalling over 285,000 PJ. Even at a conservative 25 per cent recovery rate (compared to similar sized North American shales), this could be sufficient to flow 150PJ of gas for more than 150 years.

The amounts of gas, foreseeable likely fugitive emissions, foreseeable likely carbon emissions and climate impacts, and the magnitude of fracking operations will cause significant impacts to water and a wide range protected matters under the EPBC Act.

The GGP is part of Jemena's self-proclaimed "Northern Growth Strategy, which seeks to build an interconnected supply chain of energy delivery assets in Northern Australia through targeted acquisitions and greenfield developments".⁵ The existing NGP is 90TJ and the company has plans to expand it to 700 TJ/day.⁶ The *Scientific Inquiry Into Hydraulic Fracturing* found that a production scenario of 400 TJ/day in the NT would give rise to 'unacceptable' climate change risks.⁷ Indeed, the 90 TJ/day existing NGP was 'an initial investment that could enable a series of subsequent investments to bring substantial volumes of gas from the Northern Territory to east coast markets'.⁸ These comments suggest that Jemena could use the same funding source for its investments.

The GGP is a part of a bigger plan for a pipeline from Beetaloo to basin to Wallumbilla.

Jemena's economist stated in a recent submission to the AEMC:

*The availability of large volumes of additional gas could also provide the economics for Jemena subsequently to develop a much longer pipeline with capacity of up to 700 TJ/day connecting the Beetaloo basin to Wallumbilla.*⁹

Jemena states the GGP 'complements our \$800 million Northern Gas Pipeline' and 'Should sufficient gas be made available in the Northern Territory, we will be able to expand and extend the NGP so that it can transport around 700TJs of gas each day'.¹⁰

There is clearly a larger plan. As proposed, with a 40m Construction ROW, the referred action cannot stand alone and the GGP is co-dependent on other plans. It is part of the 'much longer

⁴ Available at <http://galilee-energy.com.au/wp/wp-content/uploads/2017/10/Galilee-Energy-and-Jemena.pdf>

⁵ <https://jemena.com.au/about/projects/atlas-gas-pipeline-project>

⁶ <http://australianoilandgasreview.com.au/jemena-northern-gas-pipeline-future-hub/>

⁷ Final report, pp228,230,239

⁸ Page 10: www.aemc.gov.au/sites/default/files/2019-01/Jemena%20-%20Houston%20Kemp%20Report%20-%20Public.PDF

⁹ Page 10, www.aemc.gov.au/sites/default/files/2019-01/Jemena%20-%20Houston%20Kemp%20Report%20-%20Public.PDF

¹⁰ <https://www.miragenews.com/jemena-welcomes-call-for-greater-investment-in-pipeline-infrastructure/>

pipeline connecting the Beetaloo basin to Wallumbilla'. The actions are connected geographically and they are continuous, with no distance between them when linked up. The GGP is a part of Jemena's Northern Growth Strategy' which is evidence of a master-plan for a number of related actions.

The splitting of the GGP from other actions mentioned here reduces the ability to achieve *all* objects of the EPBC Act in s 3, in particular with respect to cumulative impacts and secondary impacts, particularly with respect to gas extraction and burning, increased emissions causing climate change impacts and the wide range of significant impacts on protected matters, . The splitting of the actions prevents sufficient assessment of the impacts of a larger action. The larger action when considered in its entirety has a significant impact on protected matters. It is more consistent with the objects of the EPBC Act for the Minister to assess and approve the larger action as a whole. Acceptance of this referral as a component in the earlier stages of the larger action limits the scope of decision making under the EPBC Act for parts of the larger action at a later date, weakening the protection of the EPBC Act by exposing protected matters to risk. We discuss below. As such the Minister must refuse the referral.¹¹

Given the referral is for a 40m ROW which takes into account commercial development of NT gas, cumulative impacts from upstream impacts of fracking, and climate change from the burning gas are relevant impacts, as they are likely to occur and are indeed made possible by the GGP. Without the GGP, commercial extraction of Beetaloo basin gas is not possible, as there is no route to a market for the gas. Without the GGP, that gas is stranded. The actions of fracking and burning gas are secondary actions under the EPBC Act and their consequences are devastating to protected matters.

Upstream fracking impacts and climate impacts caused by fugitive upstream emissions, leaking gas from the pipelines, and the ultimate burning of gas transported through the pipeline are all *indirect consequence* of the GGP under s 527E EPBC Act. Fracking and burning gas are actions taken by a second person (not Jemena) as a consequence of the primary action. The event or circumstance that is a consequence of the secondary action is a significant adverse impact on climate change and significant adverse impact on protected matters under the EPBC Act.

The IPCC states that under realistic scenarios that will enable the world to limit average global temperature rise above pre-industrial times to 1.5C there can be no expansion of gas fields. The IPCC forecast no new gas for realistic 1.5C scenario.¹² If there is new gas, emissions will rise. The difference between 1.5C scenario and a 2C scenario is that 99% of the Great Barrier Reef, protected under the EPBC Act, will be dead. What essentially remains of the Great Barrier Reef, a World Heritage Area supporting numerous protected species and eco-systems, is expected to die.

The range of significant impacts on protected species cannot be underestimated. The IPCC state if global warming is not limited to 1.5C, species loss and extinction will be higher, there will be higher impacts on terrestrial, freshwater and coastal ecosystems, there will be an increase in ocean temperature and acidity, and a decrease in ocean oxygen levels, and increase risks to marine biodiversity, fisheries and ecosystems.¹³

There will be significant social and economic impacts. Climate related-risks to health, livelihoods, food security, water supply, human security, and economic growth are projected to increase with global warming of 1.5C and increase further with 2C.¹⁴ Under some climate scenarios, there is a prediction that 3.7 degrees of warming would produce \$551 trillion in damages, whereas the total worldwide wealth today is \$280 million.¹⁵ GDP and the economy is

¹¹ <https://environment.gov.au/system/files/resources/9af4f5a0-6a4b-4322-9dd1-dbbb9710d682/files/epbc-act-policy-staged-developments.pdf>

¹² IPCC 1.5C Report (2018), Summary for Policy Makers p14, scenarios P1, P2.

¹³ IPCC 1.5C Report (2018), Summary for Policy Makers, p8:

www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf

¹⁴ As above, p9

¹⁵ R. Warren et al., "Risks Associated with Global Warming of 1.5C or 2C," Tyndall Centre for Climate Change Research, May 2018.

expected to suffer.¹⁶ Climate change poses risks to the stability of the global financial system, including in Australia.¹⁷ There are a range of health issues.¹⁸

Per the definition of secondary impacts under s 527E Jemena is aware of climate change. Its May 2018 Offering Circular published on the Singapore Stock Exchange stated (p12):

As a result of global climate changes, extreme weather events (for example, wind, floods, tidal storm surges, heatwaves and dust-storms) of increasing intensity and frequency are predicted.

Irrespective of the proponent's awareness, there is no doubt that the secondary impacts of worsening climate change are reasonably foreseeable consequence of the secondary action.¹⁹ Globally climate change will cause temperature rise to continue, sea-level rise to continue. In Australia, the oceans around us will warm and further acidification. Temperatures will increase, with more hot days and fewer cool days. Tropical cyclones will increase in intensity, extreme rainfall events likely to be more intense, harsher fire weather projected for southern and eastern Australia and decreases in winter and spring rainfall for southern continental Australia, with an increase in droughts.²⁰

s47F

Environment Council of Central Queensland

¹⁶ <https://www.rba.gov.au/speeches/2019/sp-dg-2019-03-12.html>

¹⁷ For example, Taskforce on Climate-related Financial Disclosures, Final Recommendations, June 2017.

¹⁸ <https://www.theguardian.com/environment/2019/jul/31/climate-crisis-already-causing-deaths-and-childhood-stunting-report-reveals>

¹⁹ For example IPCC AR 5, IPCC 1.5C Report, NT Scientific Inquiry)

²⁰ Bureau of Meteorology and CSIRO, State of the Climate Report, 2016

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd (2019/8484) - Submission [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:21:05 AM
Attachments: [Galilee Gas Pipeline Project 2019 8484 Submission.docx](#)

From: s47F

Sent: Thursday, 1 August 2019 4:53 PM

To: EPBC Referrals

Subject: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd (2019/8484) - Submission

Dear Department of the Environment and Energy,

Please find attached a submission for the Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd (2019/8484).

Best regards,

s47F

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of Lock the Gate Alliance to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a

secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed *'a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market'* (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows *'CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site'*.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is *'sufficiently proximate that it can be said to involve the extraction of CSG'*, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows *'The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource'*

includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Submission - Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:16:43 AM
Attachments: [GGP Submission s47F 01.08.19.docx](#)

From: s47F
Sent: Thursday, 1 August 2019 9:49 PM
To: EPBC Referrals
Subject: Submission - Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Dear Sirs

Please find attached my submission in respect of the above project.

I request that you consider this submission in making your decision regarding the project; most significantly the fact that the proposal ignores the Federal water trigger which should be a controlling provision for the project.

Yours faithfully

s47F
[Redacted]
[Redacted]
[Redacted]

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of s47F [REDACTED]
[REDACTED] to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

I note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

I urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

I consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed '*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*' (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows '*CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*'.

I note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is '*sufficiently proximate that it can be said to involve the extraction of CSG*', would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows '*The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource*'

the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

I note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

I urge you to consider this submission and my objections to the Project. I further encourage you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Yours faithfully,

s47F

[Redacted signature line]

[Redacted signature line]

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Glenaras Galilee Gas Pipeline [SEC=OFFICIAL]
Date: Friday, 2 August 2019 2:59:42 PM
Attachments: [190802Glenaras CSG Jemena Pipe Expansion ESG .pdf](#)

From: s47F [redacted]

Sent: Friday, 2 August 2019 1:55 PM

To: EPBC Referrals

Subject: Glenaras Galilee Gas Pipeline

Referrals Gateway

Environment Assessment Branch

Department of the Environment

GPO Box 787

Canberra ACT 2601

Please kindly receive this submission on behalf of Protect the Bush Alliance's membership.

Yours sincerely

s47F [redacted]

Protect the Bush Alliance

s47F [redacted]



PO Box 1040
Milton, QLD 4064

1st August 2019

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Dear Sir/Madam

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Protect the Bush Alliance (PTBA) is an alliance of 31 NGOs and community groups in Queensland and Australia representing over 30,000 people. Our goal is to implement ways of preventing the continuing loss of areas of high conservation values to inappropriate development.

Members of PTBA have had, and will continue to have, close association with many land holders and communities affected by the major resource developments planned for Queensland, as and when those developments strategically impact on areas of biological significance and diversity.

Please accept this submission on behalf of Protect the Bush Alliance to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the Galilee Gas Pipeline (GGP) as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities, and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the [action](#) involves:

- (i) [coal seam gas development](#); or
- (ii) [large coal mining development](#); and

(b) the [action](#):

- (i) has or will have a significant [impact](#) on a [water resource](#); or
- (ii) is likely to have a significant [impact](#) on a [water resource](#). “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant [impact](#) on [water resources](#) (including any [impacts](#) of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gas field. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gas field is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield.

The consequences of the gas field operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH4) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it

1

EPBC Act ss 82, 136, 528

2

[Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is *‘sufficiently proximate that it can be said to involve the extraction of CSG’*, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that ‘the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben’s long eared bat, dunmall’s snake, julia creek dunnart and the plains death adder’.

We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail.

We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Hence the above claim about species of concern and threatened communities cannot be substantiated without on ground fieldwork that considers impacts beyond just the pipeline corridor as well as the cumulative impacts of the project.

NB The guidelines actually frame the proposition in the negative, as follows *‘The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource’*

Here is a reference that states that the treatment of water is inadequate.

<https://researchers.mq.edu.au/en/publications/environmental-impact-of-coal-mining-and-coal-seam-gas-production->

Here is a very comprehensive review of the process with the final conclusion:

“Accordingly, unless legislation and Codes of Practice are strictly adhered to by these producers and/or rigorously enforced by government the evidence produced in this paper proposes that the impacts on groundwater could be severe. In addition, pro-active robust all-encompassing risk assessment and management is essential in this regard. “

https://link.springer.com/chapter/10.1007/978-3-319-28112-4_16

Glen Henly on ABC Morning News today, warns Australians there is little understanding of the temporal and spatial effects of reduced rainfall and the median drying of our Global environment. This should be of particular concern as we witness years of extreme drought and its cost throughout Australia and certainly in western and central Queensland. Any developments which encroach on the security of rivers connected to the Great Artesian Basin must be ‘off limits’.

<https://www.abc.net.au/news/2013-10-31/green-does-climate-politics-need-people-power/5059296>

As in the past; this project is presented as a minimal impact instead of being assessed within the larger framework of CSG expansion throughout Queensland. An EIS as the EPBC Act applies, must concentrate on MNES and its nominated ‘threatened species’.

As we face an ‘extinction crisis’ of unparalleled magnitude, the focus must be removed from a small nucleus of species to focus on the ‘whole’. This is essential to the natural functioning of all ecosystems; not only those assessed as threatened, of concern or vulnerable. All of life is ‘of concern’.

Yours sincerely

s47F

s47F

PTBA.

Email s47F

Mb: s47F

From: s47F
To: [EPBC.comments](#)
Subject: Submission to EPBC referral for GGP
Date: Friday, 2 August 2019 1:57:04 PM
Attachments: [GGP.referral.CAFFA.pdf](#)

Environment Assessment Branch,

Please find attached a submission on behalf of the Central Australian Frack Free Alliance (CAFFA) to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

Kind Regards,

s47F

--

s47F

Protect Country Alliance NT

Phone: s47F

Email: s47F

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.comments@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of the Central Australian Frack Free Alliance (CAFFA) to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).'

Based out of Alice Springs, CAFFA is an alliance of concerned Central Australian communities, organisations, and individuals who have serious concerns about gas fracking plans in this region and across the NT.

As this referral clearly states, whilst being a project in and of itself, the GGP will also necessarily facilitate the expansion of the NGP and allow the expansion of the NT gas sector in supplying increased volumes of gas to the East Coast.

As a diverse alliance CAFFA is well placed to understand the concerns of the community. Across the NT, there is widespread agreement that people are already experiencing impacts of climate change. With some of the most dry and hot summers on record occurring in recent years projects such as the GGP should go through a rigorous environmental assessment process.

We urge you to recognise the GGP as a controlled action under the EPBC Act, due to its climate impacts as well as the impacts it could have on water resources.

Climate Change

The GGP should be a controlled action for climate change, gas extraction, gas burning and related environmental, social and economic impacts for the development of gas in Northern Australia . The referral does not reveal the capacity or diameter of the GGP. Even without this baseline, the referral anticipates 'future increased capacity' (p1). The GGP has an expected operational life of 42 years from 01/2022 to 12/2063.

However, as planned in the referral the 40m construction ROW suggests the GGP will be at least 700 TJ/day.

Page 8 of the referral states:

Jemena is currently investigating a potential expansion of the Northern Gas Pipeline (NGP) in the event commercially [sic] viable sources of gas in the Northern Territory are proven. Per the current proposal (and action per this referral), Jemena is proposing that a larger diameter pipeline (Mainline) be constructed in a 40m

Construction ROW to negate future looping of the GGP. In the event commercially viable quantities of gas are not proven in the Northern Territory, and the NGP expansion does not proceed, then the GGP will be constructed in a 40m Construction ROW (and pipeline to be the same diameter as the lateral).

If commercially viable volumes of gas are proven in the Northern Territory, in addition to the larger diameter GGP, Jemena will seek to expand the NGP via construction of a large diameter buried gas pipeline between Mt Isa and the Longreach Scraper Station (expanding and connecting the NGP and GGP), providing the most efficient transport of large volumes of gas from the Northern Territory to the wider east coast gas market.

For the purpose of this EPBC Act Referral, the GGP and proposed NGP expansion are considered as separate actions under a staged development, with the GGP being Stage 1 (transporting gas from the Galilee Basin) and constructed well in advance of the proposed Stage 2 (the NGP expansion, transporting gas from the Northern Territory). The NGP expansion (Stage 2), will be subject to a separate EPBC Act referral and State approvals once there is greater project definition and confidence in the gas resources in the Northern Territory.

As stated in the referral, the Galilee Energy Glenaras Gas Project is highly prospective for coal seam gas (CSG) with an independently certified 3C Contingent Resource of more than 5,300 PJ. The GGP will facilitate to a major extent significant upstream and downstream impacts.

The GGP facilitates to a major extent not only the Glenaras Gas Project, but also the expansion and extension of the NGP and the gas extraction in the Northern Territory.

The description of the binding agreement between the Proponent and Galilee Energy (p6) in Galilee Energy Limited's 17 October 2017 ASX announcement *Galilee Energy and Jemena fast-track plans to connect Galilee Basin to the East Coast gas market*¹ refers to significant gas fields and that the GGP will enable the delivery of gas from NT gas fields:

Galilee Energy Managing Director, Peter Lansom explained, "Galilee Energy has one of the largest uncontracted Contingent Gas Resources on the east coast"...

The project is another key step in Jemena's plans to expand and extend its Northern Gas Pipeline, via the Galilee Basins, to the largest gas markets on the east coast,

The GGP and NGP cannot be considered separate actions under a staged development. The current proposal and action is dependent on construction of an expanded NGP from 90TJ to 700TJ, and the extension of the NGP from Mt Isa to Longreach.

The larger action is the extraction and transportation of commercially viable quantities of gas. The description of the MOU between Galilee Energy and Jemena states:

¹ Available at <http://galilee-energy.com.au/wp/wp-content/uploads/2017/10/Galilee-Energy-and-Jemena.pdf>

The project is another key step in Jemena's plans to expand and extend its Northern Gas Pipeline, via the Galilee Basin, to the largest gas markets on the east coast.

Jemena has stated about the extent of gas in the NT in documents published to the Singapore Stock Exchange (SGSPAA May 2018 Offering Circular p117):

In addition to the current [1000 PJ of] 2P reserves, the NT has large prospective shale gas reserves totalling over 285,000 PJ. Even at a conservative 25 per cent recovery rate (compared to similar sized North American shales), this could be sufficient to flow 150PJ of gas for more than 150 years.

The amounts of gas, foreseeable likely fugitive emissions, foreseeable likely carbon emissions and climate impacts, and the magnitude of fracking operations will cause significant impacts to water and a wide range of protected matters under the EPBC Act.

The GGP is part of Jemena's self-proclaimed "Northern Growth Strategy, which seeks to build an interconnected supply chain of energy delivery assets in Northern Australia through targeted acquisitions and greenfield developments".² The existing NGP is 90TJ and the company has plans to expand it to 700 TJ/day.³ The *Scientific Inquiry Into Hydraulic Fracturing* found that a production scenario of 400 TJ/day in the NT would give rise to 'unacceptable' climate change risks.⁴ Indeed, the 90 TJ/day existing NGP was 'an initial investment that could enable a series of subsequent investments to bring substantial volumes of gas from the Northern Territory to east coast markets'.⁵ These comments suggest that Jemena could use the same funding source for its investments.

The GGP is a part of a bigger plan for a pipeline from Beetaloo to basin to Wallumbilla. Jemena's economist stated in a recent submission to the AEMC:

*The availability of large volumes of additional gas could also provide the economics for Jemena subsequently to develop a much longer pipeline with capacity of up to 700 TJ/day connecting the Beetaloo basin to Wallumbilla.*⁶

Jemena states the GGP 'complements our \$800 million Northern Gas Pipeline' and 'Should sufficient gas be made available in the Northern Territory, we will be able to expand and extend the NGP so that it can transport around 700TJs of gas each day'.⁷

There is clearly a larger plan. As proposed, with a 40m Construction ROW, the referred action cannot stand alone and the GGP is co-dependent on other plans. It is part of the 'much longer pipeline connecting the Beetaloo basin to Wallumbilla'. The actions are

² <https://jemena.com.au/about/projects/atlas-gas-pipeline-project>

³ <http://australianoilandgasreview.com.au/jemena-northern-gas-pipeline-future-hub/>

⁴ Final report, pp228,230,239

⁵ Page 10: www.aemc.gov.au/sites/default/files/2019-01/Jemena%20-%20Houston%20Kemp%20Report%20-%20Public.PDF

⁶ Page 10, www.aemc.gov.au/sites/default/files/2019-01/Jemena%20-%20Houston%20Kemp%20Report%20-%20Public.PDF

⁷ <https://www.miragenews.com/jemena-welcomes-call-for-greater-investment-in-pipeline-infrastructure/>

connected geographically and they are continuous, with no distance between them when linked up. The GGP is a part of Jemena's Northern Growth Strategy' which is evidence of a master-plan for a number of related actions.

The splitting of the GGP from other actions mentioned here reduces the ability to achieve *all* objects of the EPBC Act in s 3, in particular with respect to cumulative impacts and secondary impacts, particularly with respect to gas extraction and burning, increased emissions causing climate change impacts and the wide range of significant impacts on protected matters. The splitting of the actions prevents sufficient assessment of the impacts of a larger action. The larger action when considered in its entirety has a significant impact on protected matters. It is more consistent with the objects of the EPBC Act for the Minister to assess and approve the larger action as a whole. Acceptance of this referral as a component in the earlier stages of the larger action limits the scope of decision making under the EPBC Act for parts of the larger action at a later date, weakening the protection of the EPBC Act by exposing protected matters to risk. We discuss below. As such the Minister must refuse the referral.⁸

Given the referral is for a 40m ROW which takes into account commercial development of NT gas, cumulative impacts from upstream impacts of fracking, and climate change from the burning gas are relevant impacts, as they are likely to occur and are indeed made possible by the GGP. Without the GGP, commercial extraction of Beetaloo basin gas is not possible, as there is no route to a market for the gas. Without the GGP, that gas is stranded. The actions of fracking and burning gas are secondary actions under the EPBC Act and their consequences are devastating to protected matters.

Upstream fracking impacts and climate impacts caused by fugitive upstream emissions, leaking gas from the pipelines, and the ultimate burning of gas transported through the pipeline are all *indirect consequence* of the GGP under s 527E EPBC Act. Fracking and burning gas are actions taken by a second person (not Jemena) as a consequence of the primary action. The event or circumstance that is a consequence of the secondary action is a significant adverse impact on climate change and significant adverse impact on protected matters under the EPBC Act.

The IPCC states that under realistic scenarios that will enable the world to limit average global temperature rise above pre-industrial times to 1.5C there can be no expansion of gas fields. The IPCC forecast no new gas for realistic 1.5C scenario.⁹ If there is new gas, emissions will rise. The difference between 1.5C scenario and a 2C scenario is that 99% of the Great Barrier Reef, protected under the EPBC Act, will be dead. What essentially remains of the Great Barrier Reef, a World Heritage Area supporting numerous protected species and eco-systems, is expected to die.

The range of significant impacts on protected species cannot be underestimated. The IPCC state if global warming is not limited to 1.5C, species loss and extinction will be higher, there

⁸ <https://environment.gov.au/system/files/resources/9af4f5a0-6a4b-4322-9dd1-dbb9710d682/files/epbc-act-policy-staged-developments.pdf>

⁹ IPCC 1.5C Report (2018), Summary for Policy Makers p14, scenarios P1, P2.

will be higher impacts on terrestrial, freshwater and coastal ecosystems, there will be an increase in ocean temperature and acidity, and a decrease in ocean oxygen levels, and increase risks to marine biodiversity, fisheries and ecosystems.¹⁰

There will be significant social and economic impacts. Climate related-risks to health, livelihoods, food security, water supply, human security, and economic growth are projected to increase with global warming of 1.5C and increase further with 2C.¹¹ Under some climate scenarios, there is a prediction that 3.7 degrees of warming would produce \$551 trillion in damages, whereas the total worldwide wealth today is \$280 million.¹² GDP and the economy is expected to suffer.¹³ Climate change poses risks to the stability of the global financial system, including in Australia.¹⁴ There are a range of health issues.¹⁵

Per the definition of secondary impacts under s 527E Jemena is aware of climate change. Its May 2018 Offering Circular published on the Singapore Stock Exchange stated (p12):

As a result of global climate changes, extreme weather events (for example, wind, floods, tidal storm surges, heatwaves and dust-storms) of increasing intensity and frequency are predicted.

Irrespective of the proponent's awareness, there is no doubt that the secondary impacts of worsening climate change are reasonably foreseeable consequence of the secondary action.¹⁶

Globally climate change will cause temperature rise to continue, sea-level rise to continue. In Australia, the oceans around us will warm and further acidification. Temperatures will increase, with more hot days and fewer cool days. Tropical cyclones will increase in intensity, extreme rainfall events likely to be more intense, harsher fire weather projected for southern and eastern Australia and decreases in winter and spring rainfall for southern continental Australia, with an increase in droughts.¹⁷

Water

CAFFA also takes the position that the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

¹⁰ IPCC 1.5C Report (2018), Summary for Policy Makers, p8:
www.ipcc.ch/site/assets/uploads/sites/2/2019/05/SR15_SPM_version_report_LR.pdf

¹¹ As above, p9

¹² R. Warren et al., "Risks Associated with Global Warming of 1.5C or 2C," Tyndall Centre for Climate Change Research, May 2018.

¹³ <https://www.rba.gov.au/speeches/2019/sp-dg-2019-03-12.html>

¹⁴ For example, Taskforce on Climate-related Financial Disclosures, Final Recommendations, June 2017.

¹⁵ <https://www.theguardian.com/environment/2019/jul/31/climate-crisis-already-causing-deaths-and-childhood-stunting-report-reveals>

¹⁶ For example IPCC AR 5, IPCC 1.5C Report, NT Scientific Inquiry)

¹⁷ Bureau of Meteorology and CSIRO, State of the Climate Report, 2016

Without the guarantee provided to the Glenaras gasfield of being able to fast track gas production through the GGP, it is possible that this coal seam gas development would not continue.

As with the argument relating to climate change, the GGP is facilitating and supporting the development of industry that has serious impacts on the environment, and in this case, water resources. The Glenaras gas project is located in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

From: s11C(1)(a)
To: [EPBC.comments](#)
Subject: Response to referral Galilee Gas Pipeline Project Qld
Date: Friday, 2 August 2019 4:26:37 PM
Attachments: [GGP Submission on behalf of LTG for ref 20198484.docx](#)

To the EPBC referrals team,

Please find attached a letter in response to the Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd, Reference Number: 2019/8484.

Thanks,

s11C(1)(a)

--

s11C(1)(a)

National Coordinator
Lock the Gate Alliance
s11C(1)(a)

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.comments@environment.gov.au

2 August 2019

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of Lock the Gate Alliance to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities, and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed '*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*' (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows '*CSG is composed mostly of methane (CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*'.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is '*sufficiently proximate that it can be said to involve the extraction of CSG*', would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows '*The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource*'

the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Intergenerational Equity and ESD

The GGP and related actions should be a controlled action regarding relevant environmental, social and economic impacts for the development of commercial gas extraction in Northern Australia. The volume of methane pollution from the project is relevant as part of these considerations. The referral does not reveal the capacity or diameter of the GGP. Even without this baseline, the referral anticipates 'future increased capacity' (p1). The GGP has an expected operational life of 42 years from 01/2022 to 12/2063.

However, as planned in the referral the 40m construction ROW suggests the GGP will be at least 700 TJ/day as we explain below.

Page 8 of the referral states:

Jemena is currently investigating a potential expansion of the Northern Gas Pipeline (NGP) in the event commercially [sic] viable sources of gas in the Northern Territory are proven. Per the current proposal (and action per this referral), Jemena is proposing that a larger diameter pipeline (Mainline) be constructed in a 40m Construction ROW to negate future looping of the GGP. In the event commercially viable quantities of gas are not proven in the Northern Territory, and the NGP expansion does not

proceed, then the GGP will be constructed in a 30m Construction ROW (and pipeline to be the same diameter as the lateral).

If commercially viable volumes of gas are proven in the Northern Territory, in addition to the larger diameter GGP, Jemena will seek to expand the NGP via construction of a large diameter buried gas pipeline between Mt Isa and the Longreach Scraper Station (expanding and connecting the NGP and GGP), providing the most efficient transport of large volumes of gas from the Northern Territory to the wider east coast gas market.

For the purpose of this EPBC Act Referral, the GGP and proposed NGP expansion are considered as separate actions under a staged development, with the GGP being Stage 1 (transporting gas from the Galilee Basin) and constructed well in advance of the proposed Stage 2 (the NGP expansion, transporting gas from the Northern Territory). The NGP expansion (Stage 2), will be subject to a separate EPBC Act referral and State approvals once there is greater project definition and confidence in the gas resources in the Northern Territory.

As stated in the referral, the Galilee Energy Glenaras Gas Project is highly prospective for coal seam gas (CSG) with an independently certified 3C Contingent Resource of more than 5,300 PJ. The GGP will facilitate to a major extent significant upstream and downstream impacts.

However, the GGP facilitates to a major extent not only the Glenaras Gas Project, but also the expansion and extension of the NGP, gas extraction in the Northern Territory (NT), and the transport and burning of gas downstream and release of greenhouse gas emissions.

The description of the binding agreement between the Proponent and Galilee Energy (Referral p6) in Galilee Energy Limited's 17 October 2017 ASX announcement *Galilee Energy and Jemena fast-track plans to connect Galilee Basin to the East Coast gas market*⁴ explains that the GGP will enable the delivery of gas from Northern Territory gas fields:

Galilee Energy Managing Director, Peter Lansom explained, "Galilee Energy has one of the largest uncontracted Contingent Gas Resources on the east coast"...

The project is another key step in Jemena's plans to expand and extend its Northern Gas Pipeline, via the Galilee Basins, to the largest gas markets on the east coast...

The GGP, NGP, other connecting pipelines from Beetaloo to Wallumbilla, the gas extraction projects at Glenaras and the Beetaloo, and release of greenhouse gas emissions from fugitive, leaking or burning gas, should not be considered separate actions under a staged development.

⁴ Available at <http://galilee-energy.com.au/wp/wp-content/uploads/2017/10/Galilee-Energy-and-Jemena.pdf>

Notably, the current proposal and action is dependent on construction of an expanded NGP from 90TJ to 700TJ, and the extension of the NGP from Mt Isa to Longreach. That in turn is dependent on commercially viable gas extraction in the NT.

Jemena states the GGP ‘complements our \$800 million Northern Gas Pipeline’ and ‘Should sufficient gas be made available in the Northern Territory, we will be able to expand and extend the NGP so that it can transport around 700TJs of gas each day’.⁵

The larger action is the extraction, transportation and burning of commercially viable quantities of gas. The description of the MOU between Galilee Energy and Jemena reveals:

The project is another key step in Jemena’s plans to expand and extend its Northern Gas Pipeline, via the Galilee Basin, to the largest gas markets on the east coast.

Jemena has stated about the extent of gas in the NT in documents published to the Singapore Stock Exchange (SGSPAA May 2018 Offering Circular p117):

In addition to the current [1000 PJ of] 2P reserves, the NT has large prospective shale gas reserves totalling over 285,000 PJ. Even at a conservative 25 per cent recovery rate (compared to similar sized North American shales), this could be sufficient to flow 150PJ of gas for more than 150 years.

The foreseeable likely fugitive emissions, foreseeable likely carbon emissions and climate impacts, and the magnitude of fracking operations will cause significant and cumulative impacts to water and a wide range protected matters under the EPBC Act.

The GGP is part of Jemena’s self-proclaimed “Northern Growth Strategy, which seeks to build an interconnected supply chain of energy delivery assets in Northern Australia through targeted acquisitions and greenfield developments”.⁶ The existing NGP is 90 TJ/day and the company has plans to expand it to 700 TJ/day.⁷ The *Scientific Inquiry Into Hydraulic Fracturing* found that a production scenario of 400 TJ/day in the NT would give rise to ‘unacceptable’ climate change risks.⁸

It turns out that the 90 TJ/day existing NGP was ‘an initial investment that could enable a series of subsequent investments to bring substantial volumes of gas from the Northern Territory to east coast markets’.⁹ These comments suggest that Jemena could use the same funding source for its investments.

The GGP is a part of a ‘much longer’ pipeline from Beetaloo to basin to Wallumbilla. This was confirmed by Jemena’s economist Houston Kemp in a submission to the Australian Energy Market Commission:

⁵ <https://www.miragenews.com/jemena-welcomes-call-for-greater-investment-in-pipeline-infrastructure/>

⁶ <https://jemena.com.au/about/projects/atlas-gas-pipeline-project>

⁷ <http://australianoilandgasreview.com.au/jemena-northern-gas-pipeline-future-hub/>

⁸ Final report, pp228,230,239

⁹ Page 10: www.aemc.gov.au/sites/default/files/2019-01/Jemena%20-%20Houston%20Kemp%20Report%20-%20Public.PDF

The availability of large volumes of additional gas could also provide the economics for Jemena subsequently to develop a much longer pipeline with capacity of up to 700 TJ/day connecting the Beetaloo basin to Wallumbilla.¹⁰

There is clearly a larger plan. As proposed, with a 40m Construction ROW, the referred action cannot stand alone, and the GGP is co-dependent on other plans. It is part of the 'much longer pipeline connecting the Beetaloo basin to Wallumbilla'. The actions are connected geographically and they are continuous, with no distance between them when linked up. The GGP is a part of Jemena's Northern Growth Strategy' which is evidence of a master-plan for a number of related actions.

The splitting of the GGP from other actions mentioned here reduces the ability to achieve *all* objects of the EPBC Act in s 3, in particular with respect to cumulative impacts and secondary impacts set out in this submission.

The principles of Ecologically Sustainable Development (**ESD**) under s 3A of the EPBC Act will be offended. There are long-term and short-term economic environmental, social and equitable considerations that all point against allowing the project to proceed. There are threats of serious and irreversible environmental damage. Any lack of scientific certainty is not a reason for postponing measures to prevent environmental degradation. Further, the principle of inter-generational equity (that the present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of future generations) is severely impacted. The conservation of biological diversity and ecological integrity is a fundamental consideration in decision-making, and proper consideration goes against the referral.

The splitting of the actions prevents sufficient assessment of the impacts of a larger action. The larger action when considered in its entirety has a significant impact on protected matters. It is more consistent with the objects of the EPBC Act for the Minister to assess and approve the larger action as a whole. Acceptance of this referral as a component in the earlier stages of the larger action limits the scope of decision making under the EPBC Act for parts of the larger action at a later date, weakening the protection of the EPBC Act by exposing protected matters to risk. We discuss below. As such the Minister must refuse the referral.¹¹

Given the referral is for a 40m ROW which takes into account commercial development of NT gas. The 'commercial' development requirement brings in subsequent sales to the market and burning of gas. The cumulative impacts from upstream impacts of fracking, and climate change from the burning gas are relevant impacts, as they are likely to occur and are indeed made possible by the GGP. Without the GGP, commercial extraction of Beetaloo basin gas is not possible, as there is no route to a market for the gas. Without the GGP, that

¹⁰ Page 10, www.aemc.gov.au/sites/default/files/2019-01/Jemena%20-%20Houston%20Kemp%20Report%20-%20Public.PDF

¹¹ <https://environment.gov.au/system/files/resources/9af4f5a0-6a4b-4322-9dd1-dbbb9710d682/files/epbc-act-policy-staged-developments.pdf>

gas is stranded. The actions of fracking and burning gas are secondary actions under the EPBC Act and their consequences are devastating to protected matters.

Upstream fracking impacts and climate impacts caused by fugitive upstream emissions, leaking gas from the pipelines, and the ultimate burning of gas transported through the pipeline are all *indirect consequence* of the GGP under s 527E EPBC Act. Secondary upstream impacts include fracking. Downstream the transportation, liquification and regasification (if any), leakage and of burning gas are all actions with significant impacts on matters protected. They are actions taken by a second person (not Jemena) as a consequence of the primary action. The events or circumstances that are a consequence of the secondary action has significant adverse impact on climate change, water resources and significant adverse impact on matters protected under the EPBC Act.

The upstream damage from fugitive emissions impacts climate change. There are significant water impacts. The downstream matters mentioned above all have adverse impacts on climate change and significant impacts on matters protected. Protected species and eco-systems will suffer significant impacts.

Per the definition of secondary impacts under s 527E EPBC Act Jemena is aware of climate change. Its May 2018 Offering Circular published on the Singapore Stock Exchange:¹²

As a result of global climate changes, extreme weather events (for example, wind, floods, tidal storm surges, heatwaves and dust-storms) of increasing intensity and frequency are predicted.

Irrespective of the proponent's awareness, there is no doubt that the secondary impacts of worsening climate change are reasonably foreseeable consequence of the secondary action.¹³

Thank you for considering this submission,

s11C(1)(a)

Lock the Gate Alliance

¹² SGSP (Australia) Assets Pty Limited, Offering Circular US\$5,000,000,000 Medium Term Note Program, Published on Singapore Stock Exchange, dated 8 May 2018, page 12

¹³ For example IPCC AR 5, IPCC 1.5C Report, NT Scientific Inquiry

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Galilee Gas Pipeline Project Qld [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:17:39 AM

From: s47F

Sent: Thursday, 1 August 2019 5:29 PM

To: EPBC Referrals

Subject: Galilee Gas Pipeline Project Qld

Referrals Gateway

Environment Assessment Branch

Department of the Environment

GPO Box 787

Canberra ACT 2601

By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Please accept this submission to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

I note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

I strongly urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

I consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the [action](#) involves:

(i) [coal seam gas development](#); or

(ii) [large coal mining development](#); and

(b) the [action](#):

(i) has or will have a significant [impact](#) on a [water resource](#); or

(ii) is likely to have a significant [impact](#) on a [water resource](#). “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant [impact](#) on [water resources](#) (including any [impacts](#) of associated salt production and/or salinity):

(a) in its own right; or

(b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.^[1]

The Bills digest^[2] from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘*CSG is composed mostly of methane(CH4) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*’.

I note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘*sufficiently proximate that it can be said to involve the extraction of CSG*’, would need to be referred^[3] - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

I note that the proponent finds that ‘*the key MNES that are likely to be affected by the GGP*

Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Summary

We are currently in the sixth global extinction phase, the Anthropocene, and we cannot put at risk the many species that will be impacted by this proposal. Further the water resources of Queensland should not be put at risk through this project.

I sincerely request that the proposal be rejected, or at the very least, be put through a full EIS and much more rigorous analysis of the risks to water resources and to all species adversely impacted.

Yours sincerely

s47F

[REDACTED]

[REDACTED]

[REDACTED]

[1] EPBC Act ss 82, 136, 528

[2] [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

[3] NB The guidelines actually frame the proposition in the negative, as follows '*The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource*'

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Proposed Action: Galilee Gas Pipeline Project Qld, Reference Number: 2019/8484 [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:16:06 AM
Attachments: [Galilee Gas Pipeline.docx](#)

From: s47F
Sent: Friday, 2 August 2019 7:01 AM
To: EPBC Referrals
Subject: Proposed Action: Galilee Gas Pipeline Project Qld, Reference Number: 2019/8484

To whom it may concern,
Please find my submission attached as a Word file.

Regards,

s47F

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of s47F to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

I note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

I urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

I consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a

secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed '*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*' (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows '*CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*'.

I note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is '*sufficiently proximate that it can be said to involve the extraction of CSG*', would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

³ NB The guidelines actually frame the proposition in the negative, as follows '*The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource*'

includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

I note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. I also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, I believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. I note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Sincerely,



s47F



s47F



From: [EPBC Referrals](#)
To: [EPBC comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Public comment on Referral Ref 2019/8484 [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:16:25 AM

From: s47F

Sent: Thursday, 1 August 2019 10:47 PM

To: EPBC Referrals

Subject: Public comment on Referral Ref 2019/8484

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Thank you for the opportunity to comment on the referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

The GGP Project by Jemena is of great concern and the preparation of a full Environmental Impact Statement is requested in particular to address the impact on water resources and threatened species.

Water Resources

The project includes coal seam gas development that is likely to have a significant adverse impact on water resources including the water table, water pressure, aquifers of the Great Artesian Basin and groundwater resources.

Threatened Species

We are facing a Faunal extinction of increasing proportions in Australia (Chapter 2, Faunal Extinction of Australia, Interim report Australia's Faunal Extinction Crisis

https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Environment_and_Communications/Faunalextingtion/Interim%20report/c02).

This project should not proceed without a full EIS to assess and map the flora, fauna and ecological attribute of the area and only after this a determination can be made as to the vulnerability to threatened species if this project goes ahead.

In closing, no approval until a full EIS is completed.

Respectfully

s47F

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Galilee Gas Pipeline submission [SEC=OFFICIAL]
Date: Friday, 2 August 2019 3:49:02 PM
Attachments: [WDA_submission_GGP_190802.pdf](#)

From: s47F

Sent: Friday, 2 August 2019 3:47 PM

To: EPBC Referrals

Subject: Galilee Gas Pipeline submission

Please find Western Downs Alliance's submission attached.

Kind regards

s47F

I acknowledge the Githabul people on whose traditional lands I live and work.



President: s47F
Secretary: s47F

“For the love of Southern and Western Queensland”



President: s47F
Secretary: s47F

“For the love of Southern and Western Queensland”

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

2nd August 2019

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Western Downs Alliance Inc welcomes the opportunity to make this submission regarding the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision. Frankly, we find this astonishing.

Water is vital to life in all its forms and water resources are the limiting factor in all economic activity. The current prolonged drought conditions are pushing rural and regional communities and ecological communities to the brink.

We urge you to recognise the Galilee Gas Pipeline project as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the proponents to prepare a full Environmental Impact Statement.

Water Resources

In our opinion, the Galilee Gas Pipeline should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or*
- (ii) large coal mining development; and*

(b) the action:

- (i) has or will have a significant impact on a water resource; or*
- (ii) is likely to have a significant impact on a water resource. “*

Section 528 defines coal seam gas development as:



President: s47F
Secretary: s47F

“For the love of Southern and Western Queensland”

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or*
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”*

Section 523 defines *action* to include ‘a series of activities’.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the Galilee Gas Pipeline. In fact, without the pipeline the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows

‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7



President: s47F
Secretary: s47F

***“For the love of Southern and Western Queensland”
away from the collection site’.***

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do appear to suggest that infrastructure that is ‘*sufficiently proximate that it can be said to involve the extraction of CSG*’, would need to be referred³ - which is the case here.

In our opinion, the Galilee Gas Pipeline is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the ecologically sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of the Channel Country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the Galilee Gas Pipeline must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that

‘the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder’.

We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

³ NB The guidelines actually frame the proposition in the negative, as follows ‘*The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource*’



President: s47F
Secretary: s47F

“For the love of Southern and Western Queensland”

We urge you to recognise the Galilee Gas Pipeline project as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the proponents to prepare a full Environmental Impact Statement.

Yours sincerely,

s47F

s47F

From: [EPBC.comments](#)
To: s22
Cc: [EPBC Referrals](#)
Subject: FW: Submission against the Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484 [SEC=OFFICIAL]
Date: Monday, 5 August 2019 3:50:39 PM

Good afternoon s22,

Please refer to the public comment outside of the public comment cut-off date - received for EPBC22019/8484 Galilee Gas Pipeline. Please note that this comment has not been saved to SPIRE.

Kind regards

Referrals Gateway | Assessments and Governance Branch
Department of the Environment and Energy
GPO Box 787, CANBERRA ACT 2601
Email: EPBC.Referrals@environment.gov.au | Web: www.environment.gov.au

-----Original Message-----

From: EPBC Referrals
Sent: Monday, 5 August 2019 2:42 PM
To: EPBC.comments <EPBC.comments@environment.gov.au>
Subject: FW: Submission against the Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484 [SEC=OFFICIAL]

-----Original Message-----

From: s47f
Sent: Monday, 5 August 2019 2:41 PM
To: EPBC Referrals <EPBC.Referrals@environment.gov.au>
Subject: Submission against the Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd Reference Number: 2019/8484

Please accept this submission on my behalf to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

I note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

I urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

I consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

- “(a) the action involves:
- (i) coal seam gas development; or
 - (ii) large coal mining development; and
- (b) the action:
- (i) has or will have a significant impact on a water resource; or
 - (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines action to include ‘a series of activities’.

Section 527E defines impact to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.

The Bills digest from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act

2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger.

It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’.

I note that whilst the relevant significant impact guidelines (Significant impact guidelines 1.3: Coal seam gas and large coal mining developments) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘sufficiently proximate that it can be said to involve the extraction of CSG’, would need to be referred - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the Regional Planning Interests Act 2014

(Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

I note that the proponent finds that ‘the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death

adder'. I also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project.

In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail.

I note especially the very high ecological significance of the 18 watercourses that the project plans to cross. Added to these concerns are the issues surrounding greenhouse gas emissions with CSG being found to have much higher fugitive emissions than previously attributed to the industry, making this a very unwise and potentially seriously destructive project to our present and future environment. Please act now to declare a moratorium on all new gas developments until research can demonstrate a much better understanding of the level of environmental harm caused by this dirty destructive industry. Sincere Regards

S47F

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Reference 2019/8484 [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:17:22 AM

From: s47F

Sent: Thursday, 1 August 2019 8:12 PM

To: EPBC Referrals

Subject: Reference 2019/8484

Dear People

With only a short notice of the need for a submission on this pipeline project I have been forced to utilize the details summarized below by others. As it is spelled out more completely there than I could do, I submit this in my name. The added points of objection, which will undoubtedly be outside the purview of your focus, is the continued denial of what these continuing expansion of our fossil fuel industries will do to our commitment to the Paris agreement to reduce our CO2 emissions, as it takes funding away from renewables and continues to support the expansion of our consumption and burning of these destructive sources of energy. Deny or ignore this aspect of what we are confronting with the coming climate crisis is a blatant failure of your duty of care. So....

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Please accept this submission on behalf of Lock the Gate Alliance to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484). We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if: “(a) the action involves: (i) coal seam gas development; or (ii) large coal mining development; and (b) the action: (i) has or will have a significant impact on a water resource; or (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

(a) in its own right; or

(b) when considered with other developments, whether past, present or reasonably foreseeable developments.”

Section 523 defines action to include ‘a series of activities’.

Section 527E defines impact to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a

secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’. We note that whilst the relevant significant impact guidelines (Significant impact guidelines 1.3: Coal seam gas and large coal mining developments) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘sufficiently proximate that it can be said to involve the extraction of CSG’, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake

Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the Regional Planning Interests Act 2014 (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.


Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that 'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail.

Regards,

s47F



From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Submission Galilee Gas Pipeline Project [SEC=OFFICIAL]
Date: Friday, 2 August 2019 3:48:06 PM
Attachments: [WRA submission GGP 1.docx](#)
[image001.jpg](#)

From: s47F
Sent: Friday, 2 August 2019 3:43 PM
To: EPBC Referrals
Subject: Submission Galilee Gas Pipeline Project
Please accept the attached submission from the Western Rivers Alliance.

--

Image removed by sender.



s47F
| Our Living Outback
Coordinator | Western Rivers Alliance
Ph: s47F
E: s4 / f
W: www.outbackqueensland.org.au

I acknowledge that I live and work on the land of the Jagera and Turrbal people.



Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of the Western Rivers Alliance to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

The Western Rivers Alliance is a long-standing informal alliance between individual graziers, Traditional Owners, conservation organisations and scientists advocating for the protection of rivers and floodplains of the Channel Country.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

We consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or*
- (ii) large coal mining development; and*

(b) the action:

- (i) has or will have a significant impact on a water resource; or*
- (ii) is likely to have a significant impact on a water resource. “*

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or*
- (b) when considered with other developments, whether past, present or reasonably foreseeable developments.”*

Section 523 defines *action* to include 'a series of activities'.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed '*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*' (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most notably, the proposed pipeline passes right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of the Channel Country. These river and floodplain areas are particularly susceptible to interruptions in overland flows by linear infrastructure such as access roads and pipelines.

The GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

We note especially the very high ecological significance of the 18 watercourses that the project plans to cross. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail.

s47F

s47F

Western Rivers Alliance

s47F

From: s47F
To: [EPBC.comments](#)
Cc: s47F
Subject: GGP Submssion
Date: Friday, 2 August 2019 4:53:01 PM
Attachments: [GGP Template Submission Final - for merge.docx](#)

To whom it may concern,

Please find enclose Original Power's submission regarding the Galilee Gas Pipeline proposed by Jemena.

Kind Regards,

s47F



Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.comments@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission on behalf of Original Power Limited to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484). Original Power is a not-for-profit organisation that supports Indigenous communities to determine their own affairs and future.

We note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision.

We urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

We consider that the GGP should be a controlled action for water resources because it is a key component to coal seam gas development and is therefore likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or*
- (ii) large coal mining development; and*

(b) the action:

- (i) has or will have a significant impact on a water resource; or*
- (ii) is likely to have a significant impact on a water resource. “*

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or*

(b) when considered with other developments, whether past, present or reasonably foreseeable developments." (emphasis added)

Section 523 defines *action* to include 'a series of activities'.

Section 527E defines *impact* to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP constitutes part of a coal seam gas extraction project because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed '*a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy's Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market*' (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.¹

The Bills digest² from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows '*CSG is composed mostly of methane(CH4) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site*'.

We note that whilst the relevant significant impact guidelines ([Significant impact guidelines 1.3: Coal seam gas and large coal mining developments](#)) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear

¹ EPBC Act ss 82, 136, 528

² [Bills Digest No 108, 2012-2013 \(13 May 2013\)](#) page 7

to suggest that infrastructure that is *'sufficiently proximate that it can be said to involve the extraction of CSG'*, would need to be referred³ - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it includes the pipeline passing right through a Strategic Environmental Area which is recognised in the *Regional Planning Interests Act 2014* (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

We note that the proponent finds that *'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'*. We also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, we believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. We note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Please let us now if you would like to discuss any of the issues raised above.

Yours sincerely,

s47F

s47F

³ NB The guidelines actually frame the proposition in the negative, as follows *'The development of infrastructure that is associated with CSG or large coal mining development, but which is not sufficiently proximate that it can be said to involve the extraction of CSG or coal, does not need to be referred for its impacts on a water resource'*

s47F

s22

From: s47F
Sent: Friday, 2 August 2019 4:36 PM
To: EPBC.comments
Subject: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Attachments: P779 Jemena pipeline submission [WEB].pdf

Dear Referrals Gateway team,

Please attached a submission by The Australia Institute on the Galilee Gas Pipeline. This project should be considered a controlled action under the EPBC Act and required to submit a full environmental impact statement.

s47F

The Australia Institute

The Level at Endeavour House
Level 1, 1 Franklin Street
Manuka ACT 2603

s47F

www.tai.org.au

The **Australia Institute**
Research that matters.



2 August 2019

Referrals Gateway
Environment Assessment Branch
Department of the Environment
By email: epbc.comments@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Dear Referrals Gateway staff,

The Australia Institute welcomes the opportunity to make a submission on the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484). The Pipeline Project should be considered a controlled action under the EPBC Act as it would impact on matters of national environmental significance (MNES).

Most importantly the Pipeline would facilitate the development of coal seam gas projects in the Galilee Basin and the water resource impacts that accompany such development, which is a MNES under the 2013 Water Trigger amendment. These developments in turn are likely to have an impact on other MNES such as nationally threatened species.

While perhaps not required under the EPBC Act, a full environmental impact statement would also allow consideration of the economic impacts of the pipeline project. The development of export LNG terminals at Gladstone has led to increased gas prices in the Australian east coast market, which in turn has increased costs for electricity generation and manufacturing industries. These impacts have been detrimental to the welfare of the Australian community, demonstrating the importance of thorough assessment of energy infrastructure.

Assessment of this project should also consider the potential consequences of locking in carbon emissions from unconventional gas development. While currently not considered a MNES, Australia has an obligation to reduce carbon emissions under the Paris Agreement. Recent increases in Australia's emissions are due largely to gas development.¹ Building new infrastructure that requires ongoing expansion of gas extraction is likely to continue this trend.

Government and gas industry claims that Australian gas exports displace coal generation in importing countries, resulting in lower overall emissions, are not supported by data. For example, the International Energy Agency finds that coal to gas switching contributes just 8% of emissions reductions to their sustainable development scenario. Even this small contribution takes place mainly in the United States, which is unaffected by Australian gas

¹ Saddler (2018) National Energy and Emissions Audit, September 2018, <http://www.tai.org.au/sites/default/files/NEEA%20electricity%20update%20-%20October%20%5BWeb%5D.pdf>; Swann (2018) Gorgon-tuan Problem, <http://www.tai.org.au/sites/default/files/P635%20Gorgon-tuan%20Problem%20%5BWeb%5D.pdf>

L1 Endeavour House
1 Franklin Street
Manuka ACT 2603

+61 2 6130 0530
mail@tai.org.au
tai.org.au

ABN 90 061 969 284
ACN 061 969 284



exports. It is renewable energy and efficiency which do the “heavy lifting” according to the IEA.²

The Galilee Gas Pipeline Project appears certain to impact on several matters of national environmental significance under the EPBC Act and could have impacts on many other matters of national significance beyond that act. The project should be subject to full environmental impact assessment as a controlled action under the EPBC Act.

We are happy to provide further detail if required.

Regards,



s47F



s47F



The Australia Institute

² IEA (2019) The role of gas in today’s energy transitions, <https://www.iea.org/publications/roleofgas/>

From: [EPBC Referrals](#)
To: [EPBC.comments](#)
Cc: [EPBC Referrals](#)
Subject: FW: Galilee Gas Pipeline submission - water must be protected [SEC=OFFICIAL]
Date: Friday, 2 August 2019 9:22:24 AM

From: s47F

Sent: Thursday, 1 August 2019 3:30 PM

To: EPBC Referrals

Subject: Galilee Gas Pipeline submission - water must be protected

Referrals Gateway

Environment Assessment Branch

Department of the Environment

GPO Box 787

Canberra ACT 2601

By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd

Reference Number: 2019/8484

Please accept this submission to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

I note that Jemena acknowledges threatened species and communities as a controlling provision for the project but does not recognise water resources as a controlling provision. I urge you to recognise the GGP as a controlled action under the EPBC Act, with the dual controlling provisions of threatened species and communities and water resources and to require the preparation of a full Environmental Impact Statement.

Water Resources

I consider the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources.

Section 24D of the EPBC Act requires that a corporation must not take an action if:

“(a) the action involves:

- (i) coal seam gas development; or
- (ii) large coal mining development; and

(b) the action:

- (i) has or will have a significant impact on a water resource; or
- (ii) is likely to have a significant impact on a water resource. “

Section 528 defines coal seam gas development as:

“Any activity involving coal seam gas extraction that has, or is likely to have, a significant impact on water resources (including any impacts of associated salt production and/or salinity):

- (a) in its own right; or
- (b) when considered with other developments, whether past, present or reasonably

foreseeable developments.”

Section 523 defines action to include ‘a series of activities’.

Section 527E defines impact to include not just the event or circumstance that is a direct consequence of the action, but circumstances or events that are a consequence of a secondary action, if the primary action facilitates to a major extent the secondary action. All the secondary actions and the consequential events or circumstances discussed in this submission are within the contemplation of the Proponent or are reasonably foreseeable consequences of the secondary action.

The GGP does constitute coal seam gas extraction because it is an integral part of the proposal to develop the Glenaras gasfield. The proponent states in their referral that they have signed ‘a binding agreement with Galilee Energy to fast-track plans to deliver gas from Galilee Energy’s Glenaras Gas Project, in the Galilee Basin in central Queensland, to the east-coast domestic gas market’ (p6). The project is designed solely to transport coal seam gas from the Glenaras project and is a formal component of the project via the agreement signed between parties.

The Glenaras gasfield is facilitated to a major extent by the GGP. In fact, without the GGP the gas would be stranded with no way for commercial development of the gasfield. The consequences of the gasfield operations are well known, including damage to water table, protected species, increased fugitive emissions and a range of protected matters. There are significant cumulative impacts.

The Bills digest from the introduction of the water trigger via the Environment Protection and Biodiversity Conservation Amendment Act 2012 makes it clear that piping and compressing gas was considered an integral part of a CSG project in the drafting of the water trigger. It describes the process of CSG extraction as follows ‘CSG is composed mostly of methane(CH₄) which adheres to natural pores and cracks in the coal seam and is kept in place by underground water pressure. To recover the gas, a well is drilled into the coal seam and water is pumped out, which lowers the underground water pressure. This allows the gas to come away from the coal and it then flows into the gas well, where it is collected. The CSG is processed to remove other unwanted, naturally-occurring gases (like water vapour, nitrogen, carbon dioxide and sulphur-containing gases) and is then compressed and piped away from the collection site’.

I note that whilst the relevant significant impact guidelines (Significant impact guidelines 1.3: Coal seam gas and large coal mining developments) are not an extrinsic material permitted to be used in the statutory interpretation of the water trigger, they do also appear to suggest that infrastructure that is ‘sufficiently proximate that it can be said to involve the extraction of CSG’, would need to be referred - which is the case here.

The GGP is likely to have significant impact on water resources. The proponent acknowledges in the referral that the pipeline will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River. This includes 9 watercourses that are located in the environmentally sensitive Lake Eyre Basin. Most noticeably, it

includes the pipeline passing right through a Strategic Environmental Area which is recognised in the Regional Planning Interests Act 2014 (Qld) and designed to protect the sensitive floodplains and rivers of this outback channel country.

The Glenaras gas project is also likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

Therefore, the GGP must rightly be considered along with the gasfield development as a coal seam gas activity likely to have a significant impact on water resources. Therefore, water resources should be considered a controlling provision for the purposes of the project.

Threatened Species

I note that the proponent finds that 'the key MNES that are likely to be affected by the GGP Project are the koala, yakka skink and the squatter pigeon. Species that have the potential to be affected by the GGP Project include the greater glider, corben's long eared bat, dunmall's snake, julia creek dunnart and the plains death adder'. I also note the proponent has concluded that there are no threatened ecological communities that are likely to be affected by the project. In the absence of more extensive survey and assessment, I believe that a full EIS is required to fully assess the presence of all likely species and to map the vegetation and ecological attributes in detail. I note especially the very high ecological significance of the 18 watercourses that the project plans to cross.

Yours faithfully

s47F

[Redacted signature]

[Redacted signature]

Get [Outlook for iOS](#)

s22

From: EPBC Referrals
Sent: Thursday, 1 August 2019 2:23 PM
To: EPBC.comments
Cc: EPBC Referrals
Subject: FW: Submission on GPP [SEC=OFFICIAL]
Attachments: s47F GGP Submission.docx

From: s47F
Sent: Thursday, 1 August 2019 1:53 PM
To: EPBC Referrals
Subject: Submission on GPP

Referrals Gateway
Environment Assessment Branch
Department of the Environment
GPO Box 787
Canberra ACT 2601
By email: epbc.referrals@environment.gov.au

Proposed Action: Galilee Gas Pipeline Project Qld, by Jemena Northern Gas Pipeline Pty Ltd
Reference Number: 2019/8484

Please accept this submission to the EPBC referral for the Galilee Gas Pipeline (GGP) proposed by Jemena (2019/8484).

I contend that the GGP should be a controlled action for water resources because it is a component of a coal seam gas development and it is likely to have a significant impact on water resources. It should, therefore, be assessed under Sections 24D, 528, 523, and 527E of the EPBC Act.

The GGP will cross 18 major watercourses, including the Barcoo River, the Maranoa River and the Warrego River and nine watercourses that are located in the environmentally sensitive Lake Eyre Basin. It would pass through a Strategic Environmental Area designed to protect the sensitive floodplains and rivers of this outback channel country.

The GGP would be likely to have a significant impact on water resources, located as it is in an area with well-recognised groundwater resources, including aquifers of the Great Artesian Basin.

The Commonwealth included the water trigger in the EPBC Act not that long ago. It is there to be used, to protect Australia's precious but seriously threatened water resources. I urge you to use it in relation to the GGP.

s47F

s47F

[Redacted]

[Redacted]

[Redacted]

[Redacted]

[Redacted]

From: s22
To: s22
Cc: s22
Subject: Fwd: EPBC 2019 8484 Galilee Gas pipeline Qld [SEC=UNCLASSIFIED]
Date: Thursday, 25 July 2019 4:03:49 PM
Attachments: [signed_response_to_DoEE_8484.pdf](#)
[ATT00001.htm](#)

Another one for you. s22

Sent from my iPhone

Begin forwarded message:

From: s22
Date: 25 July 2019 at 1:12:52 pm AEST
To: s22
Subject: Fwd: EPBC 2019 8484 Galilee Gas pipeline Qld
[SEC=UNCLASSIFIED]

FYI

Sent from my iPhone

Begin forwarded message:

From: s22
Date: 25 July 2019 at 12:37:37 pm AEST
To: s22
s22
Cc: s22
Subject: EPBC 2019 8484 Galilee Gas pipeline Qld
[SEC=UNCLASSIFIED]

Dear s22,

Please find attached the Department of Agriculture's comments for EPBC 2019 8484 Galilee Gas pipeline Qld

Regards

s22

Natural Resources Section | Climate and Resilience Policy Branch | Rural Policy and Farm Performance Division

Phone s22

Department of Agriculture

Rural Policy and Farm Performance Division

18 Marcus Clarke Street, Canberra ACT 2601 Australia

GPO Box 858 Canberra ACT 2601 Australia

----- IMPORTANT - This email and any attachments have been issued by the Australian Government Department of Agriculture. The material transmitted is for the use of the intended recipient only and may contain confidential, legally privileged, copyright or personal information. You should not copy, use or disclose it

without authorisation from the Department. It is your responsibility to check any attachments for viruses and defects before opening or forwarding them. If you are not an intended recipient, please contact the sender of this email at once by return email and then delete both messages. Unintended recipients must not copy, use, disclose, rely on or publish this email or attachments. The Department of Agriculture and Water Resources is not liable for any loss or damage resulting from unauthorised use or dissemination of, or any reliance on, this email or attachments. If you have received this e-mail as part of a valid mailing list and no longer want to receive a message such as this one, advise the sender by return e-mail accordingly. This notice should not be deleted or altered -----



s22

Queensland North Assessments Section
Assessments & Governance Branch
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

Dear s22

I refer to the letter of 19 July 2019 from s22 Referrals Gateway, Department of the Environment and Energy) to Senator the Hon. Bridget McKenzie, Minister for Agriculture, inviting comment on referral EPBC 2019/8484 Galilee Gas Pipeline project, Queensland, under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). The Minister for Agriculture has asked me to reply on her behalf.

The department has no comments from a portfolio perspective on whether the proposed action may have significant impact(s) on any matters of national environmental significance protected under the EPBC Act.

The department notes that this referral relates to Jemena Northern Gas Pipeline Pty Ltd's planning, construction and operation of a 585 kilometres (km) buried high-pressure gas pipeline and associated facilities from Galilee Energy's Glenaras Gas Project, near Longreach to the Queensland Gas Pipeline near Injune in Queensland.

The development footprint for this project is 2 950 hectares. The land use in the project area is predominantly sheep and cattle grazing from native vegetation/grasslands and introduced buffel grass. Land management practices such as broad scale land clearing and overgrazing have occurred over the majority of the project area and along with the prolonged drought, have vastly affected the condition of the natural environment. Livestock will be able to graze over the buried pipeline post construction and rehabilitation.

As the pipeline exceeds 300 km, an Environmental Impact Statement will be required in accordance with the *Environmental Protection Act 1994*.

Thank you for the opportunity to comment on referral EPBC 2019/8484.

Yours sincerely

Emma Cully
Assistant Secretary
Climate & Resilience Policy Branch

25 July 2019

s22

From: s22
Sent: Monday, 5 August 2019 10:15 AM
To: s22
Cc: s22
Subject: FW: Referral EPBC 2019/8484 – Galilee Gas Pipeline Project, Qld [SEC=OFFICIAL]
Attachments: image002.png; ATT00001.htm; DES response EPBC 2019-8484.pdf; ATT00002.htm

Hi s22

I think this is the one you were looking for on Friday.

s22

From: s22
Sent: Monday, 5 August 2019 10:14 AM
To: s22
Subject: Fwd: Referral EPBC 2019/8484 – Galilee Gas Pipeline Project, Qld

FYI

Sent from my iPhone

Begin forwarded message:

From: s22 <[redacted]@des.qld.gov.au>
Date: 2 August 2019 at 9:07:14 am AEST
To: s22 <[redacted]> s22 <[redacted]>
Subject: Referral EPBC 2019/8484 – Galilee Gas Pipeline Project, Qld

Hi s22

I write in response to your letter dated 19 July 2019 requesting advice on whether the above action will be assessed in a manner described in Schedule 1 of the Bilateral Agreement under section 45 of the *Environment Protection and Biodiversity Conservation Act 1999*.

I advise that on 2 July 2019 the department received an application for the above project for a voluntary environmental impact statement (EIS) under the *Environmental Protection Act 1994* (EP Act), and this application has been granted by the department. The proposal will be assessed using the EIS process in Chapter 3 of the EP Act. I have attached a scanned copy of this advice to this email.

If you have any queries about the letter, please contact s22 <[redacted]> on s22 <[redacted]>.

Kind regards, s22 <[redacted]>



Department of
Environment and Science

Ref 101/0003868-007

31 July 2019

Ms s22

Queensland North Assessments Section
Assessments and Governance Branch
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

Dear s22

Invitation to comment on referral EPBC 2019/8484 – Galilee Gas Pipeline Project, QLD

Thank you for your letter dated 19 July 2019 requesting advice on whether the above action will be assessed in a manner described in Schedule 1 of the Agreement between the Commonwealth of Australia and the State of Queensland (the Bilateral Agreement) developed under Section 45 of the *Environment Protection and Biodiversity Conservation Act 1999*.

I advise that on the 2 July 2019 the Department of Environment and Science (the department) received an application for the above project for a voluntary environmental impact statement (EIS) under the *Environmental Protection Act 1994* (EP Act). This application has been granted by the department. The project will be assessed using the EIS process under Part 1 of Chapter 3 of the EP Act. In accordance with clause 12.2 of the Bilateral Agreement, this assessment process falls within Class 3 of the Actions outlined in Schedule 1 of the Bilateral Agreement. It is therefore appropriate that the assessment process be accredited under the Bilateral Agreement.

The department will coordinate the EIS to satisfy both State and Commonwealth assessment requirements. The Commonwealth Department of the Environment and Energy shall be consulted shortly regarding the draft terms of reference for the project.

The Queensland contact officer in the department is:

s22

Principal Environmental Assessment Officer
Department of Environment and Science
GPO Box 2454
BRISBANE QLD 4000
Ph: s22
Email: s22 [@des.qld.gov.au](mailto:s22@des.qld.gov.au)

Level 9
400 George Street Brisbane
GPO Box 2454 Brisbane
Queensland 4001 Australia
Telephone + 61 7 3330 5598
Facsimile + 61 7 3330 5875
Website www.des.qld.gov.au
ABN 46 640 294 485

Should you have any further enquiries, please contact me on telephone s22

Yours sincerely

s22

Director, Operational Support

s22

From: s22
Sent: Thursday, 25 July 2019 8:44 AM
To: s22
Cc: s22
Subject: FW: GA response to Referral - (EPBC 2019/8484) - Galilee Gas Pipeline, Qld [SEC=UNCLASSIFIED]

Hi s22 one for you. s22

From: s22
Sent: Thursday, 25 July 2019 8:43 AM
To: s22
Subject: Fwd: GA response to Referral - (EPBC 2019/8484) - Galilee Gas Pipeline, Qld [SEC=UNCLASSIFIED]

Hi
FYI. Couldn't remember who was taking this one

s22

Sent from my iPhone

Begin forwarded message:

From: EPBC Referrals <EPBC.Referrals@environment.gov.au>
Date: 23 July 2019 at 9:30:23 am AEST
To: s22
Cc: EPBC Referrals <EPBC.Referrals@environment.gov.au>, s22
Subject: FW: GA response to Referral - (EPBC 2019/8484) - Galilee Gas Pipeline, Qld [SEC=UNCLASSIFIED]

Good morning s22

Please see below a comment from GA.

Kind regards

Referrals Gateway | Assessments and Governance Branch
Department of the Environment and Energy
GPO Box 787, CANBERRA ACT 2601
Email: EPBC.Referrals@environment.gov.au | Web: www.environment.gov.au



From: s22 [redacted] **On Behalf Of** EPBC
Sent: Monday, 22 July 2019 3:00 PM
To: 'EPBC' <EPBC@industry.gov.au>; s22 [redacted]
>
Cc: EPBC <epbc@ga.gov.au>; EPBC Referrals <EPBC.Referrals@environment.gov.au>
Subject: GA response to Referral - (EPBC 2019/8484) - Galilee Gas Pipeline, Qld [SEC=UNCLASSIFIED]

Good afternoon s22 [redacted],

Re: EPBC 2019/8484 - Galilee Gas Pipeline, Qld

The proposal is pertinent to the Glenaras coal seam gas project by Galilee Energy, which is the main project operating in the Galilee Basin with identified resources of 2508 PJ (as of 2017) in permit ATP2019. The project is located in the western part of the basin in central Queensland. It is considered one of the options for easing the East Coast gas crisis and the Jemena pipeline is considered crucial to deliver these resources to market.

Geoscience Australia concurs with the proponent that the proposal is neither a nuclear action or a groundwater issue related to coal seam gas or a large mining development. Geoscience Australia is not aware of any geotechnical or geological considerations associated with the proposed pipeline that have the potential to impact on matters protected under Part 3 of the *Environmental Protection and Biodiversity Conservation Act, 1999*.

Regards,

s22 [redacted] | Senior Commodity Specialist
Section Leader (A/g): Mineral Resources Advice and Promotion
Resources Advice and Promotion | Resources Division

t s22 [redacted] www.ga.gov.au



From: EPBC Referrals <EPBC.Referrals@environment.gov.au>
Sent: Friday, 19 July 2019 12:55 PM
To: 'EPBC' <EPBC@industry.gov.au>
Cc: EPBC Referrals <EPBC.Referrals@environment.gov.au>; EPBC <epbc@ga.gov.au>
Subject: HPE CM: Invitation to comment on Referral - (EPBC 2019/8484) - Galilee Gas Pipeline, Qld [SEC=OFFICIAL]
Importance: High

Good afternoon

We are sending you the attached link to a referral received for consideration under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) for your comments, as it falls within your area of interest: <http://epbcnotices.environment.gov.au/invitations/>

Formal notification of this referral and a copy of the project shapefile is attached to this email.

Any comment should be sent by 2 August 2019 via:

by letter s22 [REDACTED]
Queensland North Assessments Section
Assessments & Governance Branch
Department of the Environment and Energy
GPO Box 787
CANBERRA ACT 2601

by email s22 [REDACTED]

Regards

Referrals Gateway
Governance and Business Support Section

Geoscience Australia Disclaimer: This e-mail (and files transmitted with it) is intended only for the person or entity to which it is addressed. If you are not the intended recipient, then you have received this e-mail by mistake and any use, dissemination, forwarding, printing or copying of this e-mail and its file attachments is prohibited. The security of emails transmitted cannot be guaranteed; by forwarding or replying to this email, you acknowledge and accept these risks.



Australian Government
Department of the Environment and Energy

EPBC Act Cost Recovery - Fee Schedule

EPBC No: 2019/8484

Date of Fee Schedule: Aug. 28, 2019

Project title: Galilee Gas Pipeline Project, Queensland

Assessment method: Bilateral Agreement / Accredited Assessment Process

Fee Schedule

STAGE FEES	Base fee	PART A Complexity costs (A-L, P)	PART B Complexity costs (MNO)	Total
Stage 1	\$3,961	\$5,871	\$0	\$9,832
Stage 2	\$3,655	\$9,296	\$0	\$12,951
Stage 3	\$2,175	\$9,786	\$28,456 (Estimate)	\$40,417 (Estimate)
Stage 4	\$8,355	\$23,976	\$28,456 (Estimate)	\$60,787 (Estimate)
TOTAL PROJECT COST	\$18,146	\$48,931	\$56,913 (Estimate)	\$123,990 (Estimate)

Notes:

- For assessments by environmental impact statement - If standard guidelines are used under Section 101A(2)(a) of the EPBC Act, the Stage 1 fee will not be applicable.
- For assessments by public environmental report - If standard guidelines are used under Section 96B of the EPBC Act, the Stage 1 fee will not be applicable.
- If no further information is requested under section 95A of the EPBC Act, the Stage 1 and 2 fees will not be applicable.
- The Department advises applicants of the maximum liability for Part B complexity fees at the time of the assessment approach decision, based on the information provided in the referral documentation. Applicants have the opportunity to reduce the Part B complexity fees during the assessment process by improving the quality of information provided to the Department during Stage 2 of the assessment. These Part B complexity fees are confirmed when all the assessment documentation is provided in Stage 2, and are not payable until Stages 3 and 4 of the assessment.

Fee Breakdown

		COMPLEXITY	FEE
CONTROLLING PROVISIONS			
Part A Fees	Listed threatened species and ecological communities	Very High	
A	The Department considers 17 listed threatened species and ecological communities may be impacted by the proposed action. Further consideration is required to determine impacts and appropriate management measures for several listed species and communities.		\$48,931
B	Listed migratory species Not applicable.	None	\$0
C	Wetlands of international importance Not applicable.	None	\$0
D	Environment of the Commonwealth marine area Not applicable.	None	\$0
E	World heritage properties Not applicable.	None	\$0
F	National heritage places Not applicable.	None	\$0
G	Nuclear actions Not applicable.	None	\$0
H	Great Barrier Reef Marine Park Not applicable.	None	\$0
I	Water Resources Not applicable.	None	\$0
J	Commonwealth Land/Commonwealth Agency/Commonwealth Heritage Places Overseas Not applicable.	None	\$0
NUMBER OF PROJECT COMPONENTS			
K	Number of project components	Low	\$0

	COMPLEXITY	FEE
The proposed action has multiple activities associated with it, however the Department considers the impacts for these activities are the same.		
COORDINATION WITH OTHER LEGISLATION		
Coordination with other legislation	Low	
L The proposed action will be assessed under a bilateral agreement under Chapter 3 of the Environmental Protection Act 1994 (Qld).		\$0
ADEQUACY OF INFORMATION AND CLARITY OF PROJECT SCOPE		
Site surveys/Knowledge of environment	Moderate	
M The Department and proponent consider that further surveys are required for multiple species, where surveys have not been undertaken or have not reached the survey effort required by the Department.		\$10,982
Management measures (including mitigation and offsets)	High	
N The proponent has provided general information on potential management measures, noting that these measures will be considered in greater detail during the assessment process.		\$34,949
Project scope	Moderate	
The proponent notes that changes to the alignment of the proposed action will occur throughout the assessment process, that locations of supporting infrastructure are to be determined, and that the diameter of the mainline section of the proposed action is to be determined. However, the proponent has identified the activities that will be associated with the action, identified a corridor that activities associated with the action will occur within, has determined the approximate size of the associated activities and total disturbance footprint, and has determined the size of the construction Right of Way for both mainline diameter options.		\$10,982
EXCEPTIONAL CIRCUMSTANCES		
Exceptional circumstances	False	
P N/A		\$0
TOTAL COMPLEXITY FEES (Estimate)		\$105,844
BASE FEE		\$18,146
TOTAL FEE (Estimate)		\$123,990

Potential fees for contingent and post-approval activities (if required)

The Department will notify you if a contingent activity fee is applicable due to an additional statutory step being required under the *Environment Protection and Biodiversity Conservation Act 1999*.

Post-approval fees

Evaluation of new Action Management Plan (per management plan) (\$2,690)

Contingent Fees

Request additional information for referral or assessment approach decision (\$1,701)

Variation to the proposed action (\$1,353)

Reconsideration of the controlled action or assessment approach decision at the applicant's request (\$6,577)

Request additional information for approval decision (assessment on referral information, preliminary documentation or bilateral/accredited assessment) (\$1,701)

Request additional information for approval decision (assessment by environmental impact statement or public environment report) (\$7,476)

Variation of conditions (\$2,690)

Variation of an action management plan under conditions of approval (\$2,690)

Administrative variation of an action management plan under conditions of approval (\$710)

Transfer of approval to new approval holder (\$1,967)

Extension to approval expiry date (\$2,690)



Australian Government
Department of the Environment and Energy

EPBC Act Cost Recovery - Fee Schedule

EPBC No: 2019/8484

Date of Fee Schedule: Aug. 28, 2019

Project title: Galilee Gas Pipeline Project, Queensland

Assessment method: Bilateral Agreement / Accredited Assessment Process

Fee Schedule

STAGE FEES	Base fee	PART A Complexity costs (A-L, P)	PART B Complexity costs (MNO)	Total
Stage 1	\$3,961	\$5,871	\$0	\$9,832
Stage 2	\$3,655	\$9,296	\$0	\$12,951
Stage 3	\$2,175	\$9,786	\$28,456 (Estimate)	\$40,417 (Estimate)
Stage 4	\$8,355	\$23,976	\$28,456 (Estimate)	\$60,787 (Estimate)
TOTAL PROJECT COST	\$18,146	\$48,931	\$56,913 (Estimate)	\$123,990 (Estimate)

Notes:

- For assessments by environmental impact statement - If standard guidelines are used under Section 101A(2)(a) of the EPBC Act, the Stage 1 fee will not be applicable.
- For assessments by public environmental report - If standard guidelines are used under Section 96B of the EPBC Act, the Stage 1 fee will not be applicable.
- If no further information is requested under section 95A of the EPBC Act, the Stage 1 and 2 fees will not be applicable.
- The Department advises applicants of the maximum liability for Part B complexity fees at the time of the assessment approach decision, based on the information provided in the referral documentation. Applicants have the opportunity to reduce the Part B complexity fees during the assessment process by improving the quality of information provided to the Department during Stage 2 of the assessment. These Part B complexity fees are confirmed when all the assessment documentation is provided in Stage 2, and are not payable until Stages 3 and 4 of the assessment.

Fee Breakdown

		COMPLEXITY FEE	
CONTROLLING PROVISIONS			
Part A Fees	A Listed threatened species and ecological communities	Very High	\$48,931
	B Listed migratory species	None	\$0
	C Wetlands of international importance	None	\$0
	D Environment of the Commonwealth marine area	None	\$0
	E World heritage properties	None	\$0
	F National heritage places	None	\$0
	G Nuclear actions	None	\$0
	H Great Barrier Reef Marine Park	None	\$0
	I Water Resources	None	\$0
	J Commonwealth Land/Commonwealth Agency/Commonwealth Heritage Places Overseas	None	\$0
NUMBER OF PROJECT COMPONENTS			
	K Number of project components	Low	\$0
COORDINATION WITH OTHER LEGISLATION			
	L Coordination with other legislation	Low	\$0
ADEQUACY OF INFORMATION AND CLARITY OF PROJECT SCOPE			
Part B Fees: estimate (to be confirmed prior to Stage 3)	M Site surveys/Knowledge of environment	Moderate	\$10,982
	N Management measures (including mitigation and offsets)	High	\$34,949
	O Project scope	Moderate	\$10,982
EXCEPTIONAL CIRCUMSTANCES			
Exceptional circumstances	P Exceptional circumstances	False	\$0
TOTAL COMPLEXITY FEES (Estimate)			\$105,844
BASE FEE			\$18,146
TOTAL FEE (Estimate)			\$123,990

Potential fees for contingent and post-approval activities (if required)

The Department will notify you if a contingent activity fee is applicable due to an additional statutory step being required under the *Environment Protection and Biodiversity Conservation Act 1999*.

Post-approval fees

Evaluation of new Action Management Plan (per management plan) (\$2,690)

Contingent Fees

Request additional information for referral or assessment approach decision (\$1,701)

Variation to the proposed action (\$1,353)

Reconsideration of the controlled action or assessment approach decision at the applicant's request (\$6,577)

Request additional information for approval decision (assessment on referral information, preliminary documentation or bilateral/accredited assessment) (\$1,701)

Request additional information for approval decision (assessment by environmental impact statement or public environment report) (\$7,476)

Variation of conditions (\$2,690)

Variation of an action management plan under conditions of approval (\$2,690)

Administrative variation of an action management plan under conditions of approval (\$710)

Transfer of approval to new approval holder (\$1,967)

Extension to approval expiry date (\$2,690)



**Notification of
REFERRAL DECISION AND DESIGNATED PROPONENT – controlled action**

Galilee Gas Pipeline Project, Queensland (EPBC 2019/8484)

This decision is made under section 75 of the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act).

proposed action	To construct and operate a buried high-pressure gas pipeline and associated facilities from Galilee Energy’s Glenaras Gas Project near Longreach to the Queensland Gas Pipeline near Injune, Queensland [See EPBC Act referral 2019/8484].
------------------------	--

decision on proposed action	The proposed action is a controlled action. The project will require assessment and approval under the EPBC Act before it can proceed.
------------------------------------	---

relevant controlling provisions	<ul style="list-style-type: none">Listed threatened species and communities (sections 18 & 18A)
--	---

designated proponent	Jemena Northern Gas Pipeline Pty Ltd ACN: 607928790
-----------------------------	--

assessment approach	The project will be assessed under the assessment bilateral agreement with Queensland.
----------------------------	--

Decision-maker

Name and position	Andrew McNee Assistant Secretary Assessments and Governance Branch
--------------------------	--

Signature

date of decision	September 2019
-------------------------	----------------



Australian Government

Department of the Environment and Energy

EPBC Ref: 2019/8484

s22

Director
Impact Assessment and Operational Support
Department of Environment and Science
GPO Box 2454
BRISBANE QLD 4001

Dear s22

**Decision on referral
Galilee Gas Pipeline Project, Queensland**

This is to advise you of my decision about the referral of the proposed action, to construct and operate a buried high-pressure gas pipeline and associated facilities from Galilee Energy's Glenaras Gas Project near Longreach to the Queensland Gas Pipeline near Injune, Queensland.

As a delegate of the Minister for the Environment, I have decided under section 75 of the EPBC Act that the proposed action is a controlled action and, as such, it requires assessment and a decision about whether approval for it should be given under the EPBC Act.

The information that I have considered indicates that the proposed action is likely to have a significant impact on the following matters protected by the EPBC Act:

- Listed threatened species and communities (sections 18 and 18A).

Please note that this decision only relates to the potential for significant impacts on matters protected by the Australian Government under Chapter 2 of the EPBC Act.

A copy of the document recording this decision is enclosed. I note that the project will be assessed under a bilateral agreement under Chapter 3 of the Queensland *Environmental Protection Act 1994*.

If you have any questions about the referral process or this decision, please contact the project manager, s22, by email to s22@environment.gov.au or telephone s22 and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

Andrew McNee
Assistant Secretary
Assessments and Governance Branch
September 2019



EPBC Ref: 2019/8484

s47F

Jemena Northern Gas Pipeline Pty Ltd
Level 16, 567 Collins Street
MELBOURNE VIC 3000

Dear s47F

Decision on referral
Galilee Gas Pipeline Project, Queensland

Thank you for submitting a referral under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act). This is to advise you of my decision about the referral of the proposed action, to construct and operate a buried high-pressure gas pipeline and associated facilities from Galilee Energy's Glenaras Gas Project near Longreach to the Queensland Gas Pipeline near Injune, Queensland.

As a delegate of the Minister for the Environment, I have decided under section 75 of the EPBC Act that the proposed action is a controlled action and, as such, it requires assessment and a decision about whether approval for it should be given under the EPBC Act.

The information that I have considered indicates that the proposed action is likely to have a significant impact on the following matters protected by the EPBC Act:

- Listed threatened species and communities (sections 18 and 18A).

Please note that this decision only relates to the potential for significant impacts on matters protected by the Australian Government under Chapter 2 of the EPBC Act.

The Queensland Government has advised the Department that your project will be assessed under a bilateral agreement under Chapter 3 of the *Environmental Protection Act 1994* (Qld).

Each assessment approach requires different levels of information and involves different steps. All levels of assessment include a public consultation phase, in which any third parties can comment on the proposed action.

Indigenous communities may also need to be consulted during the assessment process. For more information on how and when indigenous engagement should occur during environmental assessments, please refer to the indigenous engagement guidelines at <http://www.environment.gov.au/epbc/publications/engage-early>.

Please note, under subsection 520(4A) of the EPBC Act and the *Environment Protection and Biodiversity Conservation Regulations 2000*, your assessment is subject to cost recovery. Please find attached a copy of the fee schedule for your proposal. An invoice for Stage 1 is also attached and must be paid prior to the Department reviewing the draft Terms of Reference for the project. Fees will be payable prior to

each stage of the assessment proceeding. Further details on cost recovery are available on the Department's website at: <http://www.environment.gov.au/epbc/cost-recovery>.

If you disagree with the fee schedule provided, you may apply under section 514Y of the EPBC Act for reconsideration of the method used to work out the fee.

The application for reconsideration must be made within 30 business days of the date of this letter and can only be made once for a fee. Further details regarding the reconsideration process can be found on the Department's website at:

<http://www.environment.gov.au/protection/environment-assessments/assessment-and-approval-process/refer-proposed-action>.

I have written to the Queensland Department of Environment and Science to advise them of this decision.

Please also note that once a proposal to take an action has been referred under the EPBC Act, it is an offence under section 74AA to take the action while the decision making process is on-going (unless that action is specifically excluded from the referral or other exemptions apply). Persons convicted of an offence under this provision of the EPBC Act may be liable for a penalty of up to 500 penalty units. The EPBC Act is available on line at: <http://www.environment.gov.au/epbc/about/index.html>

A copy of the document recording this decision is enclosed.

If you have any questions about the referral process or this decision, please contact the project manager, s22 [REDACTED], by email to s22 [REDACTED]@environment.gov.au, or telephone s22 [REDACTED] and quote the EPBC reference number shown at the beginning of this letter.

Yours sincerely

Andrew McNee
Assistant Secretary
Assessments and Governance Branch
September 2019