



North to East Australia Pipeline Stage 1: A legal information guide for the community

Have your say on the referral of the North to East Australia Pipeline Stage 1

APT Management Services Pty Ltd (**APA**) has referred Stage 1 of the North to East Australia Pipeline (**NEAP**) to the Northern Territory Environment Protection Authority (**NT EPA**) for environmental assessment under the *Environment Protection Act 2019* (NT) (**EP Act**).

The NT EPA must now make two decisions:

1. Does the NEAP require environmental approval to proceed?
2. If so, what level of environmental impact assessment is required for the Minister to be able to make an informed decision as to whether to grant environmental approval of the NEAP?

This is the first opportunity for the public to comment on Stage 1 of the NEAP, and in particular, on why the NEAP requires environmental assessment and at what level the environmental impacts of the NEAP should be assessed.

You can let the NT EPA know your views on points (1) and (2) above by sending in your submission by no later than **11:59pm (ACST) on 15 October 2026**.

The referral documents can be found on the NT EPA's website here: [North to East Australia Pipeline Stage 1 | NTEPA](#)

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What is the North to East Australia Pipeline?

APT Management Services Pty Ltd, a wholly owned subsidiary of APA Group, proposes to develop, own and operate the North to East Australia Pipeline. The NEAP is a 1,561km gas transmission pipeline to transport gas extracted from the Beetaloo Sub-basin in the Northern Territory to the East Coast Gas Grid in Queensland. The NEAP would enable the commercialisation of hydraulic fracturing (**fracking**) projects in the Beetaloo Sub-Basin.¹ The NEAP is proposed to be developed in stages, with Stage 1 focussed on the section of the NEAP located within the Northern Territory. Stage 2 of the NEAP is focussed on the section of the pipeline located in Queensland and will be assessed under Qld law.²

What is Stage 1?

Stage 1 of the NEAP comprises the construction and operation of an ~662km pipeline made up of an ~80km collection header pipeline within the Beetaloo Sub-basin gas fields (with potential for construction of additional headers as projects in the Beetaloo Sub-basin develop) and ~582km of larger buried transmission pipeline (up to 122cm in diameter) extending to the NT/QLD border near Camooweal. It also includes the installation of associated aboveground infrastructure, establishment of a 4m wide operational access track and temporary infrastructure for construction.

Stage 1 of the NEAP includes:³

- a 78,744ha proposal area comprising a:
 - 1km wide corridor for the pipeline (and deviation options within a 200m allowance corridor);
 - 100m wide corridor around access tracks; and
 - 100m wide buffer around construction camps, laydown areas and ancillary facilities (where not already within the 1km-wide pipeline corridor);
- 4,703ha of land clearing;⁴
- 731km of access tracks estimated to disturb ~1,448ha of land (existing disturbance and new disturbance);
- construction accommodation camps (workshops, offices and laydown yards);
- turkey nests (containment pools for storage of hydrotest water); and
- extra work areas and borrow pits.

What's happening in the Beetaloo?

The Beetaloo Sub-Basin is located between Katherine and Tennant Creek and contains approximately 430 trillion cubic feet of gas.⁵ In 2016, the Northern Territory Government introduced a moratorium on fracking exploration activities in the Beetaloo Basin and announced the appointment of an independent scientific panel to inquire into the impacts

¹ APT Management Services Pty Ltd, 'APA NEA Pipeline Project NT EPA Referral' (August 2026) (**Referral Report**), p 136.

² *State Development and Public Works Organisation Act 1971* (Qld).

³ Referral Report, pp 27-28.

⁴ Referral Report, p 82.

⁵ Northern Territory Government, '[Beetaloo Sub-basin](#)' *Territory Gas* (website 18 June 2026).

and risks associated with fracking.⁶ The Inquiry found that fracking presents numerous risks to the environment and determined that the risks could be mitigated if the NT Government implemented all 135 recommendations of the Report.⁷ In 2018, the NT Government lifted the moratorium and gas exploration in the region recommenced with appraisal gas flowing for the first time in September 2026.⁸ However, the commercial viability of gas resources in the Beetaloo Sub-basin relies on the development of new infrastructure to transport gas resources to the East Coast market.⁹

Approvals

In addition to the environmental approval, which is currently being consulted on, APA will need to obtain a number of other approvals, which may include:

- Commonwealth environmental approval under the *Environment Protection and Biodiversity Protection Act 1999* (Cth);
- a pipeline licence under the *Energy Pipelines Act 1981* (NT);¹⁰
- pastoral land clearing permits and non-pastoral use permits under the *Pastoral Land Act 1992* (NT) (noting these permits will need to be obtained by the relevant pastoral lessees);
- groundwater extraction licence/s, bore work permit/s and permit/s to interfere with waterways under the *Water Act 1992* (NT);
- permit/s to take and interfere with wildlife under the *Territory Parks and Wildlife Conservation Act 1976* (NT);
- permission from the Native Title holders under an Indigenous Land Use Agreement under the *Native Title Act 1993* (Cth); and
- Authority Certificate/s from the Aboriginal Areas Protection Authority under the *Northern Territory Aboriginal Sacred Sites Act 1989* (NT).

There will be additional opportunities for the public to raise concerns by submitting comments when APA apply for approvals under the *Environment Protection and Biodiversity Protection Act 1999* (Cth), and the *Water Act 1992* (NT) (and when the relevant pastoral lessees apply for approvals under the *Pastoral Land Act 1992* (NT)). There will be an opportunity for specified persons to submit comments when APA applies for a pipeline licence under the *Energy Pipelines Act 1981* (NT).¹¹

⁶ Scientific Inquiry into Hydraulic Fracturing in the Northern Territory, '[Summary of the Final Report](#)' (March 2018) (**Fracking Summary Report**), p 5.

⁷ Fracking Summary Report, p 60.

⁸ Chief Minister of the Northern Territory, '[Today we unlock the power of the Beetaloo Sub-Basin](#)' (media release, 1 September 2026).

⁹ Deloitte, '[Report on the Development of the Beetaloo Sub-basin: for the Commonwealth Department of Industry, Science, Energy and Resources](#)' (November 2020), pp 28, 45.

¹⁰ APA currently holds Onshore Pipeline Permit 9 granted under section 5 of the *Energy Pipelines Act 1981* (NT) for the purpose of entering land to determine the proposed route and other pre-feasibility issues. APA will need to obtain a pipeline licence to commence construction of the NEAP (see sections 12-15 of the *Energy Pipelines Act 1981* (NT)).

¹¹ *Energy Pipelines Act 1981* (NT) s 13(4A)(c).

What is this referral about?

Impacts to the environment are identified and assessed through a process known as Environmental Impact Assessment (**EIA**). The EIA process involves the following steps:

1. The proponent identifies whether the proposed action has the potential to have a significant impact on the environment and if so, refers the proposed action to the NT EPA.¹² Once the NT EPA accepts the referral, it will be published and open for public consultation. APA has referred Stage 1 of the NEAP (the **Proposal**)¹³ to the NT EPA and it is currently open for consultation.
2. **The NT EPA decides whether the proposed action will have a significant impact on the environment and so Environmental Impact Assessment is required. If required, the NT EPA also decides the method of assessment.**
There are four methods of assessment under the EP Act, which vary according to the information requirements of the NT EPA, the opportunities for public submissions and the timeframes involved.
3. If required, Environmental Impact Assessment of the action takes place. The NT EPA then prepares an assessment report, along with either a draft approval or a statement of unacceptable impact, to give to the Minister along with any submissions received. During the assessment period, the effect of any other licences or approvals for an action, such as a water licence, are suspended.
4. The Minister determines whether to grant environmental approval for the Proposal and what conditions the approval should be subject to. The environmental approval will override any inconsistent conditions in other approvals such as a pipeline permit, groundwater licence, pastoral land clearing permit or non-pastoral use permit.

For more information on the EIA process in the NT:

Read: EDO factsheet on [Environmental Impact Assessment under the Environment Protection Act 2019 \(NT\)](#)
NT EPA's [Environmental impact assessment and environmental approval under the Environment Protection Act 2019 \(NT\)](#)

¹² For further details, see: NT EPA, '[Referring a proposal to the NT EPA: Environmental impact assessment – Guidance for proponents](#)' (17 March 2025) and NT EPA, '[NT EPA Environmental factors and objectives: Environmental impact assessment – General technical guidance](#)' (17 March 2025).

¹³ Note: The 'Proposal' refers to Stage 1 of the NEAP, proposed to be constructed and operated in the NT. The 'Project' refers to Stage 1 and Stage 2 of the NEAP as a whole (Stage 2 of the NEAP is proposed to be constructed and operated in Qld).

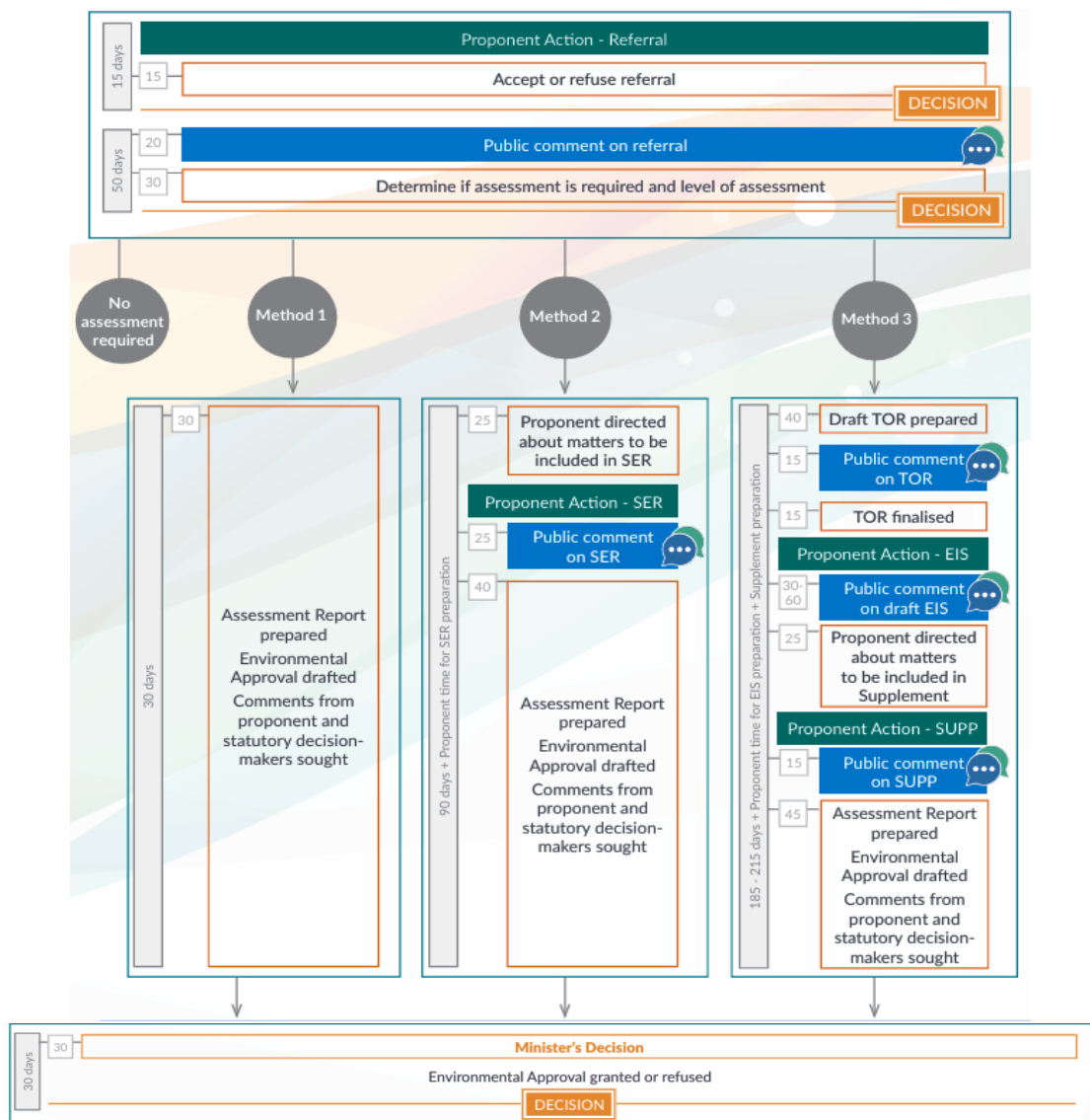
What is the NT EPA deciding now?

The NT EPA must now make two decisions:

1. Does the NEAP require environmental approval to proceed?
2. If so, what level of environmental impact assessment is required for the Minister to be able to make an informed decision as to whether to grant environmental approval of the NEAP?

This is the first opportunity for the public to comment on Stage 1 of the NEAP, and in particular, on why the NEAP requires environmental assessment and at what level the environmental impacts of the NEAP should be assessed. After submissions close on **15 October 2026**, the public may not have another opportunity to comment on the environmental assessment of the NEAP under the EP Act.

Below is a flowchart outlining the EIA and approval processes and timelines for each assessment method.¹⁴



¹⁴ Department of Environment, Parks and Water Security, '[Indicative Environmental Impact Assessment and Approval Timelines - Flowchart](#)' (9 June 2023).

Which tier/method of assessment should NT EPA assess the NEAP at?

The level of environmental assessment required by the NT EPA will determine: the volume of information APA will need to provide, the level of scientific scrutiny of the NEAP and whether there will be additional opportunities for public consultation and feedback. There are three tiers of assessment available:

1. **Assessment on referral information:** The NT EPA prepares the assessment report based on the current referral information and any further information provided by APA. There are no further opportunities for public consultation if the NT EPA decides to assess the environmental impacts of the NEAP at this level of assessment.
2. **Assessment on supplementary environmental report (SER):** The NT EPA prepares an assessment report based on the referral information, any further information from APA and a supplementary environmental report prepared by APA. There is an opportunity for the public to comment on the SER after APA provide it to the NT EPA, before the NT EPA prepare its assessment report.
3. **Assessment by Environmental Impact Statement (EIS):** This is the most rigorous level of assessment required to assess most high-risk proposals. The NT EPA must prepare terms of reference for APA to address in its EIS. There are a number of opportunities for the public to provide comments on the terms of reference, the draft EIS and any supplement to the EIS prior to the NT EPA preparing its assessment report.

In addition to the three tiers, there may also be an assessment by inquiry. This can be used for some or all components of the EIA process where an oral inquiry is considered more appropriate than a paper-based approach. The inquiry would be run by the NT EPA or an appointed panel. The NT EPA must prepare terms of reference for an environmental impact assessment that includes an assessment by inquiry (and as noted above, there is an opportunity for public comment on the terms of reference).

Submissions on the referral

The NT EPA must consider all submissions received by the public in relation to the referral.¹⁵ **It is important to make a submission now because there may not be another opportunity for the public to comment if the NT EPA decide that the NEAP does not require environmental assessment or that the NEAP can be assessed on the referral information only.**

¹⁵ *Environment Protection Regulations 2020* (NT) r 56(c).

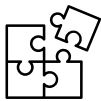
In 2025, the NT EPA decided that the environmental impacts of the Sturt Plateau Pipeline, another gas pipeline owned by APA under a subsidiary, did not require EIA.¹⁶ The NEAP is over 15 times the length of the Sturt Plateau Pipeline and has the potential to have significant environmental impacts. In our view, the NEAP requires the highest level of scrutiny – a Tier 3 environmental assessment by EIS.

You can make a submission and call for the NT EPA to assess the NEAP by EIS by no later than **11:59pm (ACST) on 15 October 2026**.

Your submission should clearly identify your concerns with the NEAP and why you say the highest tier of assessment is required. For the greatest impact, we recommend including issues that matter the most to you or your organisation.

Read: For further guidance in preparing a submission and making it persuasive, refer to [EDO's Factsheet on submission writing](#).¹⁷
For regulatory guidance, see [NT EPA's Guide for making a public submission](#).

What are some of our biggest concerns with the NEAP?



Cumulative and indirect upstream impacts

- **Incomplete assessment of “significant impacts”** – An “impact” of an action includes both a “direct consequence” and “an event or circumstance that is an indirect consequence of the action and the action is a substantial cause of that event or circumstance” under the EP Act.¹⁸ A “significant impact” is an “impact of major consequence having regard to (a) the context and intensity of the impact; and (b) the sensitivity, value and quality of the environment impacted on and the duration, magnitude and geographic extent of the impact”.¹⁹

As mentioned above, the NT EPA must determine whether the referred action has the potential to have a significant impact on the environment.²⁰ As APA acknowledge, the NEAP is “enabling infrastructure”, critical to facilitate the development and commercialisation of gas extraction projects in the Beetaloo Sub-Basin.²¹ Without the NEAP, fracking projects in the Beetaloo Sub-Basin will not be commercially viable. The following risks from fracking in the Beetaloo Sub-

¹⁶ Northern Territory Environment Protection Authority, ‘[Notice of Decision and Statement of Reasons](#)’ (11 March 2025).

¹⁷ Note: This Factsheet discusses engaging in environmental law and policy decision-making processes from an NSW jurisdictional perspective.

¹⁸ *Environment Protection Act 2019* (NT) s 10.

¹⁹ *Environment Protection Act 2019* (NT) s 11.

²⁰ *Environment Protection Act 2019* (NT) s 55(2).

²¹ Referral Report, p 136.

Basin could be argued to be indirect upstream impacts of the NEAP that must be disclosed and assessed in order for the environmental impacts of the Proposal to be appropriately considered.

- **Climate** – While APA has recognised the cumulative greenhouse gas (**GHG**) emissions generated by both stages of the NEAP Project,²² the referral documentation does not account for the cumulative or indirect upstream GHG emissions.
- **Water** – APA acknowledge that “[l]imited information on terrestrial GDEs [groundwater-dependent ecosystems] is available in the Study Area”.²³ The upstream indirect impacts to water quality, groundwater and surface water flows and groundwater dependent ecosystems from fracking in the Beetaloo have not been considered.
- **Biodiversity** – While APA mention indirect degradation of adjacent habitat,²⁴ the upstream indirect impacts to biodiversity from fracking in the Beetaloo have not been considered.



Emissions

- **Incomplete emissions estimations information** – Acknowledging “GHG emissions are not constrained by administrative or jurisdictional boundaries and contribute to atmospheric concentrations at a regional scale,” APA’s assessment under the Atmospheric Processes factor mostly considers obligations in relation to emissions generated by Stages 1 and 2 of the NEAP (the **Project**) as a whole as opposed to the Proposal (Stage 1 only) located in the NT jurisdiction.²⁵ APA acknowledges that there is uncertainty regarding the final emissions profile of the Project (and the effectiveness of emissions management and reduction measures) due to the “current level of design maturity”.²⁶ The assessment of the impact of GHG generated by the Project is incomplete in the following ways:
 - While APA has estimated the operational emissions, it has failed to estimate emissions from the construction phase, despite acknowledging that GHG emissions are expected to arise from land clearing activities as well as combustion of fuel in construction vehicles, mobile equipment and stationary plant and equipment during the construction phase. APA explain this information gap exists because these estimations are heavily influenced by factors that are subject to change during project development (such as final design, quantities of materials, construction methodologies, sourcing of materials, transport disturbances, fuel consumption, equipment requirements and the construction schedule).²⁷

²² Referral Report, p 150.

²³ Referral Report, p 92.

²⁴ Referral Report, p 93.

²⁵ Referral Report, p 131.

²⁶ Referral Report, p 133.

²⁷ Referral Report, p 132.

- APA estimates operational GHG emissions as exceeding the Safeguard Mechanism threshold level. These emissions are primarily combustion emissions generated by gas compression (with minor contributions from combustion of vehicle fuel) as well as additional methane emissions that may occur through venting, fugitive releases and incomplete combustion processes. APA note that the estimate will be refined as additional information becomes available (such as the final pipeline alignment, pipeline specifications, including diameter and associated infrastructure, compression requirements and forecast gas throughput).²⁸
- APA indicate a forthcoming GHG Assessment will quantify the Project's direct and indirect emissions and its cumulative contribution to GHG emissions, identify and evaluate feasible emissions reduction opportunities, demonstrate how emissions will be adaptively managed throughout the Project's lifecycle and outline how the Project will minimise its contribution to GHG emissions and support the NT Government's objective of achieving net zero emissions by 2050.²⁹ However, this GHG Assessment is required at the outset, to inform the assessment of the environmental impacts of the Project.
- **Inappropriate Reliance on the Safeguard Mechanism** – APA estimate that the NEAP will operate for 40 years and, acknowledging the uncertainties regarding the emissions profile discussed above, provide a preliminary estimate that during operations, the NEAP Project (Stage 1 and 2) will generate over 100,000 tonnes of CO₂-e (carbon dioxide equivalent) per year, exceeding the threshold at which a facility is likely to be captured under the Australian Government's Safeguard Mechanism.³⁰ APA explains that this means that the Project is “expected to be subject to regulation and oversight by the Australian Government and other requirements of the Safeguard Mechanism, including a declining emissions baseline”.³¹
 - **What is the Safeguard Mechanism?** If the net Scope 1 GHG emissions from the NEAP exceed the Safeguard Mechanism, APA will be required to take action to manage the excess emissions by surrendering carbon credit units or Safeguard Mechanism credit units to the Clean Energy Regulator under the *National Greenhouse and Energy Reporting Act 2007* (Cth) (**NGER**).³²

APA has assessed the residual impacts from GHG emissions generated by the Project as moderate on the basis that exceedance of the Safeguard Mechanism “triggers a regulatory mechanism to ensure emissions are reduced over time to meet climate targets”.³³ However, it is important to recognise that the emissions reporting scheme under the NGER only incentivises facilities that already emit GHGs to reduce the facility's emissions. The scheme under the NGER cannot prevent the release of GHG from occurring, rather it manages projects which will exceed the Safeguard

²⁸ Referral Report, p.132.

²⁹ Referral Report, p 134.

³⁰ Referral Report, pp 35, 132.

³¹ Referral Report, p 133.

³² *National Greenhouse and Energy Reporting Act 2007* (Cth), ss 22XF, 22XN.

³³ Referral Report, p 134.

Mechanism once operational. Assessment by EIS is needed so that strategies that actually reduce and/or mitigate GHG emissions generated by the Project can be considered.

- **Incompatible with net zero target** – It is unclear how the NEAP will support the NT EPA’s objective for the Atmospheric Processes environmental factor to “minimise GHG emissions so as to contribute to the NT Government’s goal of achieving net zero GHG emissions by 2050” when the operation of the NEAP alone exceeds the Safeguard Mechanism. Furthermore, as outlined above, the NEAP’s indirect GHG emissions arising from fracking in the Beetaloo have not been disclosed or assessed.



Risks to water

- **Hydrotest chemicals details missing** – “Hydrotest water” (typically, chemically conditioned water used to prevent corrosion, microbial growth and operational issues during testing and holding periods) is required to commission the pipeline.³⁴ APA note that the hydrotest water will be stored in purpose-built containment structures called “turkeys’ nests”. APA intend to discharge the hydrotest water over land (at “controlled locations” and “at rates to prevent erosion, sediment mobilisation and impacts to receiving environments”) yet have disclosed that the types and volumes of chemicals required is unknown on the basis that those specifications are dependent on the existing water quality of the groundwater being used.³⁵ While APA state that the water quality will be assessed prior to discharge,³⁶ in our view, the environmental impacts of this activity, including the risk of contamination to soil (and leaching into groundwater) cannot be assessed properly while the type and volume of chemicals is unknown.
- **Intersections with watercourses that impact swamps and waterholes** – APA identifies 18 major watercourses and numerous minor watercourses that the NEAP (pipeline and access tracks) will intersect.³⁷ The Waterway Crossing Assessment conducted by EcOz Environmental Consultants (**EcOz**) noted that “several crossings were identified as being positioned within comparatively wetter or deeper sections of the watercourse, including areas supporting water lilies within SOBS [Sites of Botanical Significance]” and stated that “minor realignment of these crossings – as indicated in the assessment – is recommended to reduce potential impacts to these longer-lasting waterbodies and the aquatic vegetation and large habitat trees they support.”³⁸ EcOz also noted that “[g]iven the prevalence of mature Coolabah riparian vegetation across the surveyed watercourses – including trees containing

³⁴ Referral Report, p 80.

³⁵ Referral Report, p 80.

³⁶ Referral Report, p 82.

³⁷ Referral Report, p 120.

³⁸ Referral Report, Appendix F: EcOz Environmental Consultants, ‘[Ecological Assessment Report North to East Australia Pipeline \(NEAP\): Stage 1 \(Northern Territory\) APT Management Services Pty Ltd \(APA\)](#)’ (15 July 2026) (**Ecology Report Part C**), Appendix C: Waterway Crossing Assessment, p 13. See also [Ecology Report Part A](#) and [Ecology Report Part B](#).

hollows and nests – avoidance of large habitat trees is recommended where practicable during construction. Where removal of these trees cannot be avoided, a pre-clearance survey and use of a fauna spotter-catcher should also be undertaken, as required.”³⁹

- **Flood study not provided** – While APA indicate a flood study will inform locations where the pipeline may need to be buried deeper as a mitigation measure (in areas of the corridor that are likely to experience high flows or elevated flows during flood events), as well as the location of above ground facilities, camp sites and wet-weather access tracks to camp sites, that flood study has not yet been completed and so cannot be assessed.⁴⁰
- **Erosion and Sediment Control Plans not provided** – During construction, land clearing and earthworks may lead to localised increases in flow velocity, minor redistribution of sheet flow pathways, and short-term diversion of runoff during rainfall events. During operation, the retained operational access track may result in minor and localised changes to surface flow (including marginal increases in flow velocity and limited redirection of runoff along sections of the corridor). While APA state that Erosion and Sediment Control Plans “would be prepared” for each waterway crossing, incorporating standards that require that channel form, bed profile and surface gradients are restored post-construction, the details of these plans have not yet been made available and so cannot be assessed.⁴¹



Impacts to threatened species

- **Impacts to Plains Death Adder, Yellow-spotted Monitor, Gouldian Finch, Grey Falcon, Painted Honeyeater and Northern Blue-tongued Skink** – APA relies on a desktop ecological assessment, supplemented by field surveys, by EcOz. The ecological assessment was undertaken across a 1km wide corridor for the proposed pipeline route and a 500m wide corridor for proposed access tracks, with a total of 95,065ha (**Study Area**). Based on a desktop ‘likelihood of occurrence’ assessment, the following species were assessed further: Plains Death Adder, Yellow-spotted Monitor, Gouldian Finch, Grey Falcon, Painted Honeyeater, and Northern Blue-tongued Skink. The Plains Death Adder and Yellow-spotted Monitor were assessed as having a high likelihood of occurring in the Study Area. The Grey Falcon and Northern Blue-tongued Skink were assessed as having a moderate likelihood of occurrence. The Gouldian Finch and Painted Honeyeater were initially considered to have a moderate likelihood of occurring in the Study Area and subsequently revised to low likelihood, based on the results of the field survey.⁴²

³⁹ Ecology Report Part A, Appendix C, p 13.

⁴⁰ Referral Report, p 126.

⁴¹ Referral Report, p 126.

⁴² Referral Report, p 92; Ecology Report Part A, p iv.

Note for further details regarding the assessment by EcOz Environmental Consultants, see Appendix E of Ecology Report Part C (Threatened Species ‘Likelihood of Occurrence’ Assessment Procedure).

- **Operational impacts not assessed** – The threatened species significant impact assessment⁴³ assumes that only activities within the construction phase (when ground disturbance and trenching will occur) have the potential to have a significant impact, noting a limited requirement for on-site activities during operations.⁴⁴ Potential impacts from the operation of the NEAP (for example, possible vibration, noise and/or possible impacts from the operation of the compressor stations) have not been addressed.
- **Fragmentation of habitat** – While APA has stated that “much of the temporary construction footprint would be rehabilitated following construction, reducing long-term fragmentation” of habitat,⁴⁵ details about the rehabilitation activities proposed and when that rehabilitation will occur have not been provided.



Land clearing

- **Clearing of 4,703ha of native vegetation** – APA anticipates that 4,703ha of vegetation will need to be cleared during construction of the NEAP, with 409ha of permanent clearing to facilitate operational access to the pipeline and associated operational ancillary infrastructure.⁴⁶ The Study Area crosses three bioregions: the Sturt Plateau in the north, the Gulf Fall and Uplands in the central section, and the Mitchell Grass Downs across much of the southern section. While the proposed route of the NEAP does not intersect any national parks, conservation reserves or Sites of Conservation Significance, it does intersect or pass close to several Sites of Botanical Significance associated with waterholes, rivers and locally important landforms.⁴⁷
- **Clearing of riparian vegetation** – APA acknowledges that riparian vegetation plays a key role in filtering run-off, improving water quality and stabilising banks to reduce erosion as well as, where it differs from surrounding upland vegetation, supporting unique biodiversity, refuge habitat and movement corridors.⁴⁸ APA states that approximately 4,294ha of the cleared vegetation will be reinstated, with reinstatement commencing following completion of construction. While acknowledging that “temporary clearing will affect ecological function within the construction footprint while rehabilitated areas re-establish,” APA states that the magnitude of the impact would be minor due to (amongst other things) the “temporary disturbance” and “limited permanent habitat loss,”⁴⁹ without providing

⁴³ Note: This assesses whether there is a real chance or possibility that the Proposal activities will significantly impact an important population of each of the species (as defined in *EPBC Significant Impact Guidelines 1.1*). For each of the abovementioned species, each question in the impact assessment is answered in the negative. See Referral Report, p 98-117; Ecology Report Part A, pp iii-iv; Ecology Report Part B, p 53-79.

⁴⁴ Referral Report, p 101-117.

⁴⁵ Referral Report, p 93.

⁴⁶ Referral Report, p 82.

⁴⁷ Referral Report, p 83. See further: Ecology Report Part A, p 4.

⁴⁸ Referral Report p 86.

⁴⁹ Referral Report, p 94.

details about how the rehabilitation of the cleared land will occur or the likelihood of successful rehabilitation.

- **Risk of erosion not adequately addressed** – An Erosion Risk Assessment by EcOz (**Erosion RA**) is appended to the Proposal. The Erosion RA finds that “although overall soil loss risk ratings across the Proposal are low, the scale and linear extent of disturbance within the CROW [Construction Right of Way] represents a material erosion risk if not effectively managed. Without appropriate controls, widespread disturbance has the potential to result in cumulative off-site impacts, despite low inherent soil loss ratings”.⁵⁰ The Erosion RA recommends “erosion and sediment control must be proactively addressed by APA across all phases of the Proposal including planning, design, construction and rehabilitation, to ensure risks to the receiving environment are reduced to as low as reasonably practicable”.⁵¹ This includes developing (and implementing) a Primary Erosion and Sediment Control Plan and Progressive (site-specific) Erosion and Sediment Control Plans aligned with construction staging, amongst other things.⁵² While APA refer to geotechnical investigations as enabling avoidance of high-risk erosion areas and the implementation of site-specific sediment and erosion control measures, details about these investigations and plans are missing.



Incomplete information

- **Low confidence in predictions** – The substantial knowledge gaps in the Proposal are relevant to the level of confidence in predicting potential significant impacts of the proposed action, as well as the effectiveness of any proposed measures to avoid, mitigate or manage those potential significant impacts identified by the proponent, which is a factor the NT EPA must consider in deciding the method of EIA.⁵³ In accordance with the precautionary principle, decision-making should be guided by a careful evaluation to avoid serious or irreversible damage to the environment wherever practicable and an assessment of the risk-weighted consequences of various options.⁵⁴
- **Pipeline route** – While the Proposal details the NT Portions that the Proposal intersects,⁵⁵ APA also refers to a proposed deviation of the pipeline route around Exploration Lease (EL) 32497. Although APA notes that the deviation does not introduce any additional values, constraint or impact pathways and so has not been

⁵⁰ Referral Report, Appendix E: EcOz Environmental Consultants, ‘[Erosion Risk Assessment: NEA Pipeline – Stage 1 APT Management Services Pty Ltd \(APA\)](#)’ (7 July 2026) (**Erosion Risk Assessment**), p 24.

⁵¹ Erosion Risk Assessment, p 24.

⁵² Erosion Risk Assessment, p 24.

⁵³ *Environment Protection Regulations 2020* (NT) r 59.

⁵⁴ *Environment Protection Act 2019* (NT) s 19(2).

⁵⁵ APT Management Services Pty Ltd, [Referral Form](#) (17 August 2026), p 3.

assessed separately, it does traverse the Buchanan Rises Sites of Botanical Significance⁵⁶

- **Decommissioning and Rehabilitation** – While APA describes the Proposal documents as assessing the potential environmental impacts associated with the construction, operation and decommissioning of the NEAP,⁵⁷ there are very limited details provided with respect to decommissioning activities and rehabilitation.
- **Community consultation** – Despite not having yet completed community consultation, including with Traditional Owners,⁵⁸ APA has concluded that the NEAP has the potential to result in moderate and minor positive and adverse impacts on people and communities.
- **Excluded environmental factors** – APA has excluded a number of environmental factors based on its pre-referral screening.⁵⁹ Of those, the following are relevant considerations that should be addressed in an assessment of the Proposal by EIS:
 - **Landforms:** Despite identifying 9 landforms mapped within the Study Area relevant to the NT EPA’s Terrestrial Ecosystems factor,⁶⁰ APA has excluded the Landforms factor on the basis that “there are no distinct or sensitive natural landforms identified within the Proposal area”.⁶¹
 - **Inland Water Environmental Quality:** APA has excluded the Inland Water Environmental Quality factor on the basis that the Terrestrial Environmental Quality factor has addressed:
 - residual impacts associated with erosion and sediment migration, despite the information gaps about how the risk of erosion will be managed as mentioned above; and
 - the disposal of hydrotest wastewater, despite the missing details relevant to the assessment of risk (including with respect to groundwater contamination) as mentioned above.
 - **Aquatic Ecosystems:** APA has excluded the Aquatic Ecosystems factor on the basis that potential impacts of land clearing and construction on the watercourse crossings are considered within the Terrestrial Ecosystems factor.
 - **Air Quality:** Despite acknowledging that the NEAP will emit in excess of 100,000 tonnes of CO₂-e per year and noting there remain uncertainties regarding the effectiveness of emissions management strategies that may be developed as the detailed design progresses,⁶² APA has excluded the Air Quality factor on the basis that operational emissions are not anticipated to result in significant impacts to air quality because of the expected emissions profile and incorporation of emission management measures within the facility design.
 - **Human Health:** APA has excluded the Human Health factor on the basis that the Proposal activities will occur in remote locations and away from communities.

⁵⁶ Referral Report, p 73.

⁵⁷ Referral Report, p 153.

⁵⁸ Referral Report, p 140; Referral Report, Appendix C: True North Strategic Advisory, ‘[NT Referral Engagement Report](#)’ (August 2026), p 25.

⁵⁹ Referral Report, pp 72-73.

⁶⁰ Referral Report, p 85.

⁶¹ Referral Report, p 72.

⁶² Referral Report, p 133.

This emission calculation fails to account for the cumulative impact of emissions on human health (including on a safe and liveable climate) as a result of the NEAP enabling commercial gas extraction in the Beetaloo Sub-Basin.

How do I lodge a submission?



Online

[NT EPA website](#)



Post

NT EPA
GPO Box 3675
DARWIN NT 0801



In person

Level 1 Arnhemica House
16 Parap Road
PARAP NT

You can also make your submission orally in person or by audio or audio-visual recording. If you have further queries about the submission making process relevant to your individual circumstances, you should contact the NT EPA by email at eia.ntepa@nt.gov.au or by phone on (08) 8924 4218.

What happens after I send in my submission?

All comments received during the referral process will be published by the NT EPA as soon as practicable online, unless anonymity or non-publication of certain information has been requested.

Once the referral consultation period has closed, the NT EPA has **30 business days** to decide whether EIA is required and, if so, at what tier the NEAP should be assessed.⁶³

The EDO acknowledges the Traditional Owners of the lands on which the Proposal is located and the surrounding areas. We pay our respects to their Elders past, present and emerging.

Contact details

For further information please contact the EDO on darwin@edo.org.au

⁶³ *Environment Protection Regulations 2020* (NT) r 57(3).