



APA NEA Pipeline Project NT EPA Referral
August 2026

Referral Report under the Environment Protection Act 2019





Acknowledgement of Country

At APA, we acknowledge the Traditional Owners and Custodians of the lands on which we live and work throughout Australia.

We acknowledge their connections to land, sea and community.

We pay our respects to their Elders past and present, and commit to ensuring APA operates in a fair and ethical manner that respects First Nations peoples' rights and interests.

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1.

Executive summary



This Report has been prepared to support the Referral of APA's proposed Stage 1 North to East Australia (NEA) Pipeline Project (the Proposal) under the *Environment Protection Act 2019* (NT) (EP Act). The purpose of the Referral is to provide the Northern Territory Environment Protection Authority (NT EPA) with sufficient information on the Proposal and its potential environmental impacts to determine whether the Proposal requires assessment under the EP Act, and if so, the appropriate level of assessment.

The Proposal will also be referred under the *Environment Protection and Biodiversity Conservation Act 1999* (Cth) (EPBC Act).

Overview of the Proposal

APA proposes to develop the NEA Pipeline Project (the Project), a new gas transmission pipeline connecting gas resources within the Beetaloo Sub-basin in the Northern Territory (NT) to the East Coast Gas Grid (ECGG) in Queensland (QLD). The Project has an overall length of approximately 1,561 km and has been divided into two stages to enable a staged approvals and assessment process.

- **Stage 1** (the Proposal), which forms the basis of this Report, is located entirely within the NT and comprises approximately 662 km of buried gas transmission pipeline, including an approximately 80 km collection header within the Beetaloo Sub-basin and approximately 582 km of larger diameter pipeline extending to the NT- QLD border near Camooweal. The Proposal also includes associated above ground infrastructure, operational access tracks and temporary construction infrastructure required to construct, commission and operate the pipeline.
- **Stage 2** comprises approximately 899 km of pipeline within QLD extending from the NT–QLD border to a connection with the South West Queensland Pipeline (SWQP). Stage 2 will be subject to separate assessment and approvals processes in QLD.

This Report has been prepared solely in relation to Stage 1 of the Project which is within the NT jurisdiction. Accordingly, the environmental impact assessment presented in this Report considers the potential impacts associated with the construction, operation and decommissioning of Stage 1 only. Information relating to the broader Project, including Stage 2, is provided where relevant to describe the overall Project context, need and cumulative impact considerations.

The Proposal will provide critical infrastructure to connect Beetaloo gas resources to the ECGG and is intended to:

- Provide a route to market for gas resources from the Beetaloo Sub-basin.
- Support forecast domestic gas demand in eastern Australia.
- Improve energy security and reliability.
- Support economic development within the NT and Australia.

The table below provides an overview of the Proposal.

Attribute	Details
Proponent	APT Management Services Pty Ltd (APA)
Proposal	Stage 1 of the Project
Length	Approximately 662 km
Location	Beetaloo Sub-basin to NT–QLD border, near Camooweal
Land tenure	• Predominantly pastoral leasehold • Freehold • Aboriginal freehold • Crown land • Road reserve
Nearest regional centres	Elliott, Alpururulam, Daly Waters and Camooweal
Construction duration	Approximately 3 years

Attribute	Details
Workforce (persons)	Construction: 1,000 (during peak periods) Operations: 15-20
Temporary disturbance footprint	4,294 ha
Operational disturbance footprint	409 ha

Location and land tenure

The Proposal is located approximately 500 km south-east of Darwin and traverses predominantly pastoral land within the Roper Gulf and Barkly regions. The Proposal is generally remote from major population centres, with the nearest sensitive receptors comprising pastoral homesteads located on properties intersected by the Proposal. Nearby communities within the broader area include Elliott, Daly Waters, Alpururulam and Camooweal.

Environmental impact assessment

A preliminary environmental impact assessment has been undertaken in accordance with the NT EPA's environmental factors and objectives framework. The assessment identified six environmental factors requiring detailed consideration in this Report. For each factor, the relevant environmental values, potential residual impacts and ratings have been assessed and are summarised in the table below.

The assessment concluded that residual impacts to five of the six factors are expected to be **minor** and are unlikely to be significant following implementation of the proposed mitigation and management measures.

A **moderate** residual impact rating has been applied to the Atmospheric Processes factor. Preliminary estimates indicate that operational emissions associated with the broader Project would exceed the Safeguard Mechanism threshold of 100,000 tCO₂-e per annum. Further assessment is required to characterise the Project's emissions profile, however APA's obligations under the Safeguard Mechanism combined with the proposed mitigation measures are expected to progressively reduce emissions intensity over time. Accordingly, the Proposal is unlikely to impede the Northern Territory Government's achievement of its net zero emissions targets.

Factor	Residual impact	Conclusion
Terrestrial environmental quality	Minor	The Proposal has the potential to result in a minor residual impact on terrestrial environmental quality. Construction activities may cause localised erosion, sediment mobilisation, soil migration and contamination associated with hydrotest water management. These impacts are expected to be temporary and localised. The implementation of erosion and sediment controls, progressive rehabilitation, hydrotest water management measures and construction during the dry season would minimise impacts on both land and soil values.
Terrestrial ecosystems	Minor	The Proposal has the potential to result in a minor residual impact on terrestrial ecosystems. Construction activities involve vegetation clearing, habitat and fauna disturbance and impacts to ecological features such as riparian vegetation, wetlands, sinkholes and hollow-bearing trees. However, the linear disturbance footprint, avoidance of sensitive ecological features where practicable, fauna management measures, and rehabilitation of temporary disturbance areas are expected to minimise impacts on biodiversity values.

Factor	Residual impact	Conclusion
Hydrological processes	Minor	The Proposal has the potential to result in a minor residual impact on hydrological processes. Construction activities, including watercourse crossings, trenching and groundwater extraction, may temporarily alter surface water flows, watercourse stability and groundwater levels. However, these impacts are expected to be localised and temporary, with watercourse crossing controls, erosion and sediment management measures, groundwater management measures and progressive rehabilitation minimising impacts on hydrological values.
Atmospheric processes	Moderate	The Project (entire NEA Pipeline Project) will generate GHG emissions during construction and operation, with operational emissions expected to be the primary source over the Project lifecycle. Preliminary estimates indicate operational Scope 1 emissions are likely to exceed the Safeguard Mechanism threshold, triggering regulatory oversight and compliance with a declining emissions baseline. APA would manage emissions through the application of its GHG mitigation hierarchy of avoid, reduce and offset, supported by a GHG management framework that includes emissions quantification, design optimisation, minimisation of venting and fugitive emissions, and assessment of feasible emissions reduction technologies. When benchmarked against the Northern Territory's total annual greenhouse gas emissions, the Proposal's operational emissions are estimated to be a relatively small contribution in the context of total Territory-wide emissions. However, the Project's emissions profile and reduction opportunities will be further refined through detailed design and operational planning. A comprehensive GHG assessment would be prepared in accordance with NT EPA guidance to quantify emissions, evaluate mitigation measures, and demonstrate how emissions will be managed throughout the Project lifecycle to support the Northern Territory's net zero emissions objective by 2050.
Communities and economy	Minor	The Proposal has potential to result in both adverse and positive minor residual impacts on communities and economy. Adverse impacts reflect the localised and temporary effects to landholders, road users, community services and infrastructure, biosecurity, and Aboriginal cultural heritage values. Positive outcomes are expected through employment, local procurement and contracting opportunities, and broader economic activity. APA will continue consultation and assessment as project design and execution planning progresses to inform adaptive management, address cumulative effects where relevant, and support the NT EPA's objective of enhancing communities and the economy for the benefit of current and future generations of Territorians.

Factor	Residual impact	Conclusion
Culture and heritage	Minor	The Proposal has potential to result in a minor residual impact on culture and heritage. While the Proposal has been designed to avoid known cultural heritage and sacred sites, there remains potential for previously unidentified values to be recorded through ongoing investigations. APA will continue to consult with the Northern Land Council and Traditional Owners and undertake sacred site clearances, archaeological surveys, negotiation of Indigenous Land Use Agreements and implementation of Cultural Heritage Management Plans. Subject to completion of these processes and ongoing engagement with Traditional Owners, significant residual impacts on cultural heritage values are not anticipated, and the NT EPA's objective for cultural heritage is expected to be achieved.

Principles of Environment Protection and Management

The Proposal has been designed and assessed in accordance with the principles of environmental protection and management under Part 2 of the EP Act.

The Proposal has applied the mitigation hierarchy by:

- Avoiding environmental, cultural and social values through route selection and design refinement as a priority where baseline assessments are ongoing.
- Minimising impacts through industry-standard environmental management measures.
- Implementing progressive rehabilitation and ongoing environmental management.
- Applying a precautionary approach where uncertainty remains.
- Climate change considerations have been incorporated through GHG emissions reduction opportunities, infrastructure resilience and alignment with relevant NT and Commonwealth climate policy frameworks.

Conclusion

The Proposal has been designed to avoid and minimise impacts through route selection, environmental investigations, stakeholder engagement and application of the mitigation hierarchy. Where baseline studies are ongoing, the design retains flexibility to avoid sensitive environmental and cultural values wherever practicable.

The assessment concludes that with the proposed avoidance, mitigation and management measures, potential residual impacts to terrestrial environmental quality, terrestrial ecosystems, hydrological processes, community and economy, and culture and heritage are all assessed as **minor**.

Potential GHG emissions from the Project are likely to trigger the Safeguard Mechanism which mandates an annual baseline emissions reduction. As there are uncertainties relating to the final emissions profile, the residual impact to atmospheric processes has been assessed as **moderate**.

APA will continue to undertake targeted studies, modelling and detailed design to refine the understanding of potential impacts, reduce uncertainty and inform adaptive management measures. With implementation of the proposed mitigation and environmental management measures, the Proposal is expected to avoid significant impacts and achieve the NT EPA's environmental factor objectives.

2. Publication statement



This Report has been prepared by EcOz Environmental Consultants (EcOz) on behalf of APA. A listing of the key consultants, their qualifications and experience in the environmental field are provided below.

Details	
Referral Report Author	Glen Ewers
Position	Team Leader – Ecology
Qualifications	Bachelor of Science; Bachelor of Laws; Diploma of Arts (Environmental Studies); Graduate Certificate in Ornithology
Years experience	15+ years
Referral Report Author	Britanny Crescentino
Position	Senior Consultant – Impact Assessment and Approvals
Qualifications	Bachelor of Environmental Science
Years experience	8+ years
Referral Report Reviewer	Emma Lewis
Position	Team Leader – Impact Assessment and Approvals
Qualifications	Bachelor of Science
Years experience	13+ years

Inputs from relevant technical consultants have been provided throughout the development of this Report. A listing of the key technical consultants is provided below.

Company	Specialist area
EcOz Environmental Consultants	Ecology assessments. Surface water and groundwater assessments. Impact assessment.
Remote Heritage Services	Culture and heritage assessments.
True North Strategic Advisory	Stakeholder engagement and social impact assessment.

Acronyms

AAPA	Aboriginal Areas Protection Authority
ABS	Australian Bureau of Statistics
ACCC	Australian Competition and Consumer Commission
AEMO	Australian Energy Market Operator
AGP	Amadeus Gas Pipeline
APA	APT Management Services Pty Ltd (a wholly owned subsidiary of APA Group)
APGA	Australian Pipelines and Gas Association
AOO	Area of occupancy
ASS	acid sulfate soils
ASX	Australian Stock Exchange
BGL	Below ground level
BOM	Bureau of Meteorology
CEMP	Construction Environmental Management Plan
CGP	Carpentaria Gas Pipeline
CHSA	Cultural Heritage Sensitivity Area
CLA	Cambrian Limestone Aquifer
CSPMP	Community and Social Performance Management Plan; strategic plan for community engagement and social performance.
DCCEEW	Commonwealth Department of Climate Change, Energy, the Environment and Water
DENR	Department of Environment and Natural Resources (Northern Territory) – formerly DLRM
DISR	Department of Industry, Science and Resources
DLI	Department of Logistics and Infrastructure
DOH	Department of Health
DLPE	Department of Lands, Planning and Environment
DLRM	Department of Land Resource Management (Northern Territory) – now DENR
DOEE	Department of the Environment and Energy (Commonwealth)
ECGG	East Coast Gas Grid
EcOz	EcOz Environmental Consultants
EIA	Environmental Impact Assessment
EIS	Environmental Impact Statement
EL	Exploration Lease
EP Act	EP Act is the accepted acronym for the NT <i>Environment Protection Act 2019</i>
EPBC Act	<i>Environment Protection and Biodiversity Conservation Act (1999)</i> (Commonwealth)
ESCP	Erosion and Sediment Control Plan
GPG	Gas Powered Generation
GSOO	Gas Statement of Opportunities
HDD	Horizontal directional drilling

HGVs	Heavy goods vehicles
IAP2	International Association for Public Participation
IOC	APA's Integrated Operations Centre
KP	Kilometre Point
LNG	Liquified natural gas
MCA	Multi-criteria analysis
MLV	Main Line Valve
MTIC	Miscellaneous Transport Infrastructure Corridor
NGP	Northern Gas Pipeline
NT	Northern Territory
NT EPA	Northern Territory Environmental Protection Agency
NTG	Northern Territory Government
NVIS	National Vegetation Information System
PMP	Property Management Plan
QLD	Queensland
RAP	Reconciliation Action Plan
RWA	Restricted work area
SEP	Stakeholder engagement plan
SIA	Significant impact assessment
SREBA	Strategic Regional Environmental and Baseline Assessment
SPP	Sturt Plateau Pipeline
SWQP	South West Queensland Pipeline
TIA	Traffic impact assessment
TMP	Traffic management plan
TPWC Act	<i>Territory Parks and Wildlife Conservation Act (Northern Territory)</i>
WAP	Water Allocation Plan
WMPC Act	<i>Waste Management and Pollution Control Act (WMPC Act)</i>
WMS	Wastewater management system
WMZ	Water Management Zone

Standard terms

Term	Definition
Above Ground infrastructure	Above ground infrastructure that form part of the overall pipeline licence and are required for safe and efficient operation of the pipeline, typically including: • compressor stations • main line valve (MLV) stations • scraper stations • telemetry and monitoring equipment
Allowance corridor	A 200 m-wide planning and design corridor within which the final pipeline alignment and associated construction infrastructure will be located. The Allowance Corridor provides flexibility to refine the route and avoid identified environmental, cultural heritage, landholder and engineering constraints during detailed design. Disturbance is expected to occur primarily within the Construction Right of Way (CRoW) and associated temporary disturbance areas.
Ancillary Infrastructure	Non-pipeline infrastructure required to enable construction and operation of the pipeline. Examples of ancillary infrastructure includes: • access track upgrades (majority for construction only with a residual number being retained for operational access) • offsite pipe stockpiles (construction only) • construction camps (construction only) • water bore establishment (construction only) • turkeys nest dams (construction only)
Applicant/ Proponent	APT Management Services Pty Ltd, who is a wholly owned subsidiary of APA Group, an energy infrastructure business listed on the ASX.
Beetaloo Sub-basin	Primary source of gas that would feed into the NEA Pipeline.
Cathodic Protection	A method to prevent pipeline corrosion using electrical currents and sacrificial anodes.
Collection header	Term used for a high-pressure gas pipeline that collects and transports processed gas from processing facilities within the Beetaloo sub-basin to the NEA Pipeline.
Compressor Station	A facility used to compress gas to achieve a desired pressure that enables efficient transportation through the pipeline downstream.
Construction phase	The temporary period during which Proposal is constructed, including mobilisation, establishment of temporary work areas, vegetation clearing, trenching, pipeline installation, crossing construction, rehabilitation and commissioning of the pipeline and associated infrastructure.
Construction Right of Way (CRoW)	The temporary corridor used during pipeline construction. This corridor is required to safely construct the Project infrastructure. CRoW would accommodate standard working width, additional workspace areas, turn arounds and access tracks.
Decommissioning phase	Safe retirement and rehabilitation of a pipeline and above ground facilities at the end of its operational life.
Detailed design phase	The detailed design process converts approved concepts into construction-ready specifications through route refinement, engineering analysis, and compliance with relevant standards. It integrates safety, environmental, and integrity considerations with rigorous verification, documentation, and regulatory approval to ensure the pipeline is safe, reliable, and fit for long-term operation.
Disturbance footprint	The maximum area of land that may be disturbed by the Proposal during construction and operation. This includes the CRoW, access tracks, above ground

Term	Definition
	infrastructure, water storage infrastructures, construction camps, extra work areas and the operational access track. As the final design has not yet been confirmed, the disturbance footprint represents the maximum extent of potential disturbance assessed in this Report. Refer to Table 2 for a detailed breakdown.
Easement	Instrument that provides legal encumbrance on a pastoral lease or freehold land title that allows for protection of the pipeline asset during operation, including ongoing access for maintenance, inspection and surveillance activities associated with safe pipeline operation.
Extra workspace area	Workspace areas outside the CRow for equipment and material laydowns, vehicle turnaround areas, offsite pipe stockpiles and general stockpiling of extractive material.
First Nations people	People of Aboriginal and/or Torres Strait Islander descent.
Hydrotesting	Process of testing pipeline integrity by filling sections with water and pressurising them to a specified level over time.
Indigenous Land Use Agreement (ILUA)	A negotiated agreement with native title holders to enable access and land use for pipeline construction and operation.
Laydown area	Designated area for storage of materials and equipment during construction.
Main line valve (MLV) stations	MLV stations contain valves to shut off pipeline flows and are designed to minimise inventory loss in event of a significant leak or rupture. Small fenced compounds typically spaced every 75km. Locations to be determined during detailed design in consultation with landholders.
Operational footprint	The area of land that would be disturbed and used for ongoing operation and maintenance of the Proposal following construction and reinstatement. This includes the maintained operational access to the pipeline, above ground infrastructure and access tracks required to compressor stations.
Pipe stockpiles and turn arounds	Areas for vehicle turnarounds and stockpiles/laydown yards. Estimated footprint of 20m x 20m area roughly spaced every 50km. Locations to be determined during detailed design in consultation with landholders.
Pipeline markers	Above ground Pipeline identification signs that identify the location of the buried pipeline. Safety requirement as per AS2885.1.
Proposal area	The maximum development envelope within which the Proposal may occur. The Proposal area encompasses all permanent and temporary infrastructure, including above ground infrastructure and the pipeline corridor. Refer to Table 2 for a detailed breakdown.
Scraper station	Scraper stations allow in-pipe gauging, cleaning and in-line inspection during the pipeline's commissioning and operation. Spacing of scraper stations is subject to engineering and design assessment to ensure intelligent tools can operate within their battery life between stations.
Stage 2	The Queensland component of the Project, comprising the pipeline and associated infrastructure. Stage 2 will be connected to and developed in conjunction with Stage 1 to enable operation of the Project as an integrated gas transmission system.
Study area	The geographic area within which a technical study was undertaken. Study area extents are specific to each environmental factor and are defined in the relevant assessment chapter.
Telemetry and monitoring equipment	Telemetry and monitoring equipment will be installed to allow the pipeline to be operated remotely.

Term	Definition
Temporary disturbance footprint	The area of land temporarily disturbed during construction of the Proposal, including the CRoW, temporary access tracks, laydown areas, construction camps, stockpile areas and other extra work areas. These areas would be progressively rehabilitated and reinstated following completion of construction activities.
The Project	North to East Australia Pipeline (Stage 1 and Stage 2).
The Proposal	Stage 1 of the Project (the action within the Northern Territory and that which is assessed in this Report).

1. Introduction

This Report has been prepared by EcOz Environmental Consultants (EcOz) on behalf of APA to support the referral of the proposed Stage 1 North to East Australia (NEA) Project (the Proposal). The purpose of the Report is to provide the Northern Territory Environment Protection Authority (NT EPA) with sufficient information on the Proposal and its potential environmental impacts to determine whether the Proposal requires assessment under the *Environment Protection Act 2019* (NT) (EP Act) and, if required, the appropriate level of assessment.

1.1 Project overview

APA, a leading Australian energy infrastructure company, plans to develop the NEA Pipeline Project as a standalone multiuser asset conveying natural gas interstate from the Beetaloo Sub-basin in the Northern Territory (NT) approximately 1,561 kilometres (km) to the South West Queensland Pipeline (SWQP) in southern Queensland (QLD) (herein referred to as the Project).

The pipeline would collect processed gas approximately 500 km south-east of Darwin via one approximately 80 km long collection header pipeline. It would feed it into a centralised compressor station and then transport gas east and south through a gas pipeline for approximately 1,561 km to a tie-in point of the SWQP.

By linking Beetaloo gas resources to the East Coast Gas Grid, the Project would provide a strategic and reliable gas supply to address a forecasted shortfall in domestic gas supply, support peak demand, facilitate renewable energy integration and provide a route to market for Beetaloo gas to be exported as liquified natural gas. While the Project will be designed as a whole, the scale and cross-jurisdictional context of the Project require a staged State-based approach to investigations and approvals.

1.2 Staged approvals approach

To expedite gas supply to the existing transmission network, Project approvals would be split into two stages.

Stage 1 extends approximately 662km and comprises ~80 km collection header within the Beetaloo Sub-basin gas fields, and an approximately 582 km larger pipeline (up to 122cm diameter) extending to the NT/QLD border near Camooweal, a point where it crosses the existing Northern Gas Pipeline (NGP) (herein referred to as the Proposal).

This Referral relates to Stage 1 only.

Stage 2 extends approximately 899 km within Queensland from the NT/QLD border to the SWQP. The pipeline would follow the Carpentaria Gas Pipeline (CGP) corridor, and the existing Miscellaneous Transport Infrastructure Corridor (MTIC) for approximately 400 km, before diverging south to connect with the SWQP about 90 km east of Ballera.

Stage 2 will be assessed under the QLD environmental approvals process pursuant to the *QLD State Development and Public Works Organisation Act, 1971* (SDPWO Act).

Stage 1 and 2 will also be referred for assessment under the *Environment Protection and Biodiversity Conservation Act 1999* (EPBC Act) – see Section 6.3.4 for further detail.

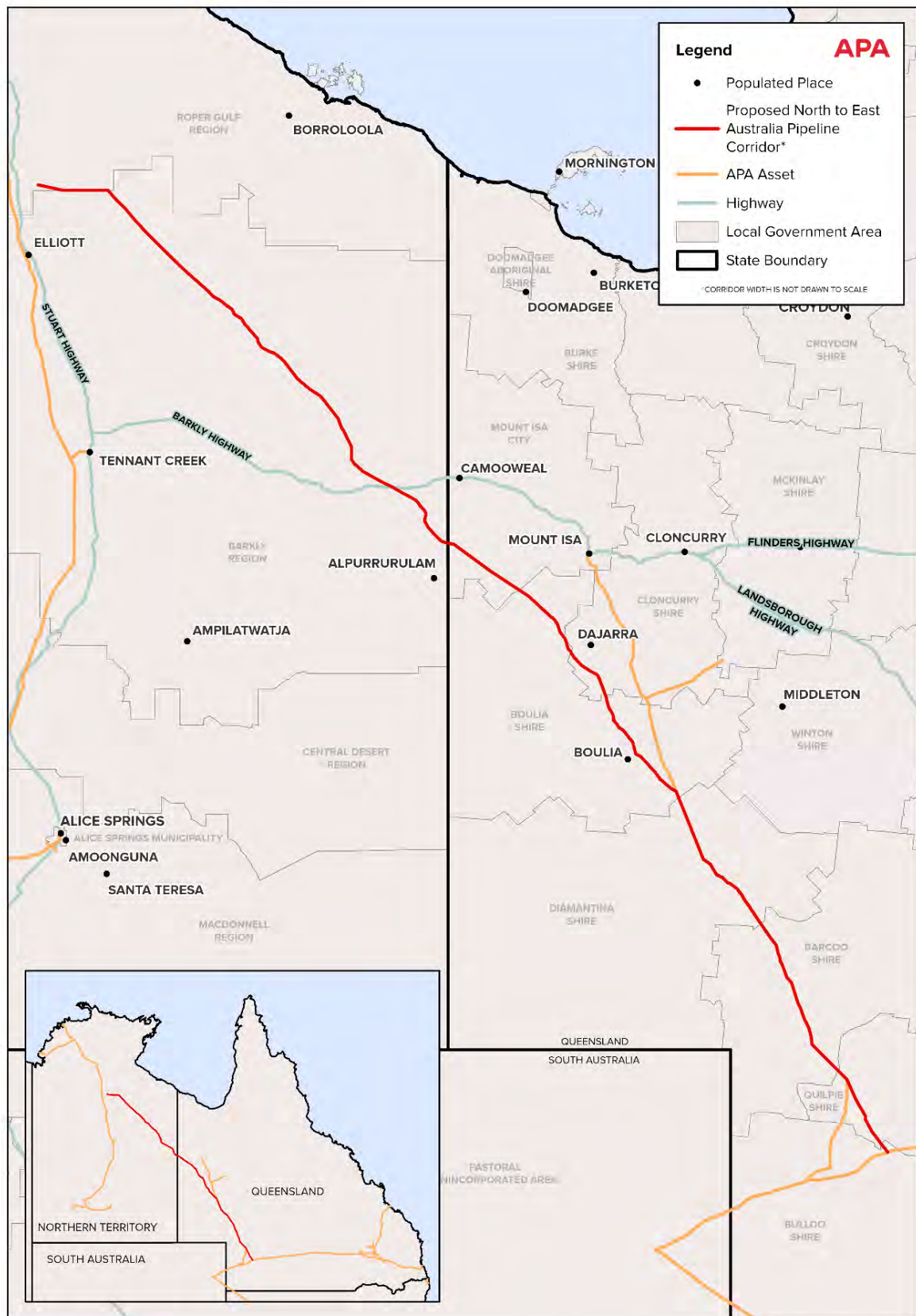


Figure 1. Project Map

1.3 Proposal overview

The Proposal represents Stage 1 which comprises the construction and operation of an approximately 662 km buried pipeline, the installation of associated above ground infrastructure and cathodic protection system, establishment of 4m wide operational access track and supporting temporary infrastructure for construction, including accommodation camps, offices, laydown yards and access tracks.

The location of the Proposal is shown in Figure 2.

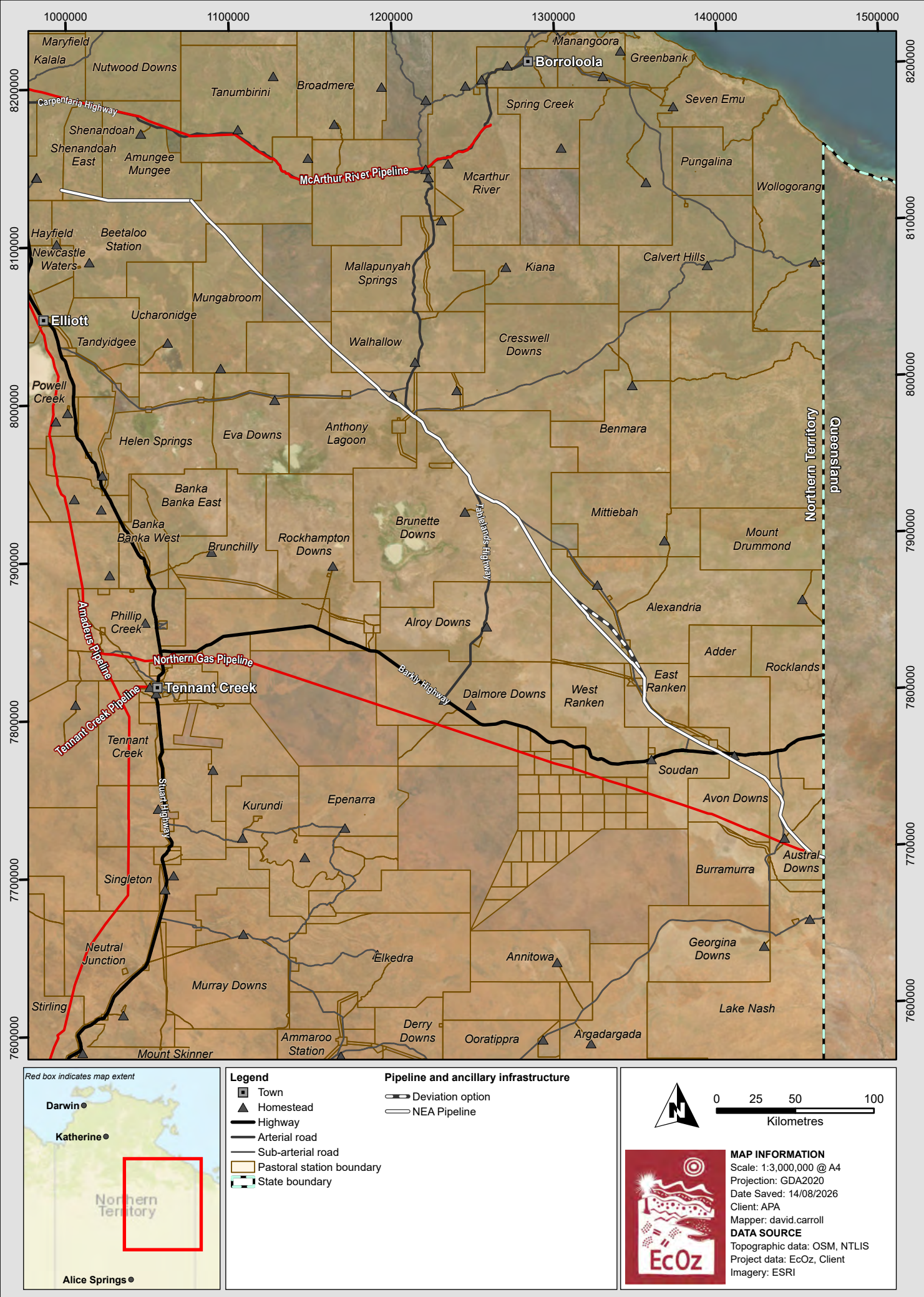


Figure 2. Proposal location

1.4 Proponent details

APA intends to develop, own and operate the Project, building on its long-standing success in delivering safe and reliable gas pipeline and energy infrastructure across Australia.

APA is a leading Australian energy infrastructure company with a long track record in developing, constructing and operating linear energy assets across Australia. Established in 2000 and listed on the Australian Securities Exchange (ASX), APA has expanded from gas transmission into electricity infrastructure and renewables, supporting Australia's energy transition through reliable, lower emissions energy systems.

Since the year 2000, APA has grown through acquisitions and diversified beyond gas pipelines into electricity interconnectors and renewables. It owns and operates over 15,000 km of natural gas transmission pipelines, including the East Coast Gas Grid (ECGG) and key Western Australian assets, as well as gas storage facilities.

APA also operates gas-fired power generation assets, including the Diamantina Power Station in QLD, and electricity transmission interconnectors, such as Murraylink, Directlink, and Basslink, which are critical to the National Electricity Market. In renewable energy, APA manages wind and solar farms, including Emu Downs and Badgingarra, and is advancing battery storage projects such as the Port Hedland Solar and Battery project.

APA's governance framework ensures Board level involvement across environmental and climate matters, with the company's disclosures being subject to external assurance. Community engagement, social procurement, and First Nations partnerships are integral to APA's approach to developing energy infrastructure. APA is fully resourced and funded to deliver the necessary consultation, investigations, assessments and reporting for approvals.

APA upholds a strong environmental compliance record, achieving zero penalty infringement or warning notices in the 2024-2025 financial year and maintaining only a small number of minor incidents, which were transparently reported to regulators. The company's environmental management is guided by the Health, Safety, Environment and Heritage Policy, regular audits, and an ongoing improvement program. Heritage and biodiversity outcomes are further enhanced through targeted protocols and meaningful engagement with First Nations stakeholders. Overall, APA's approach is defined by transparency, swift response to issues and a consistent trend of strong compliance and continual enhancement of its environmental performance.

APA recognises delivering the Project represents a significant undertaking, balancing the demands of infrastructure development with the unique characteristics of remote regions. Having already commenced landholder consultation and site assessments, APA would draw on its long and proven track record of successful developments applying in-house technical expertise in planning and design of the Project, further engaging subject matter specialists support to deliver the necessary assessments and management planning to support approvals for the Project. Consultation and engagement are well advanced in regional locations; APA have the following dedicated communications channels available to the public:

- Telephone: 1800 856 001
- Online submission form: <https://www.apa.com.au/contact-us/north-to-east-australia-pipeline-project/>
- Email: nea@apa.com.au

APT Management Services Pty Limited is a wholly owned subsidiary of APA Group and is the holder of Pipeline Permit #9 (authority to survey) for the Proposal in the NT. APT Petroleum Pipelines Pty Limited, also a subsidiary of APA Group, is the holder of the Petroleum Survey Licence (authority to survey) for Stage 2 in QLD.

1.5 Proposal need and objectives

1.5.1 Beetaloo Sub-basin overview

The Beetaloo Sub-basin, located 500km south-east of Darwin in the NT, covers 28,000km² and is estimated to contain 430 trillion cubic feet of natural gas. The Beetaloo Sub-basin is in the early stages of its development, with future development infrastructure required to access and transport the resource for use. Several companies have undertaken appraisal drilling and are proposing to undertake additional development work to verify gas production quantities, construct pipeline infrastructure and enhance supporting infrastructure (i.e. road, rail and utility infrastructure) to connect the resource to domestic and international commercial markets.

1.5.2 National and State government initiatives

The Australian Government has demonstrated support for developing the Beetaloo Sub-basin under the Beetaloo Strategic Basin Plan (2021), where the Australian Government describes the basin's resource potential as "a significant opportunity for the economic recovery of the NT and Australia," projecting up to 6,000 jobs by 2040 and \$18–36.8 billion in additional economic activity. The ability to supply gas into the East Coast domestic gas market would bring a significant Sovereign economic value to nationally significant industries, jobs and populations.

The Australian Government's stance is reinforced through alignment with the Commonwealth's 'Future Gas Strategy' (The Strategy) (Department of Industry, Science and Resources, 2024), which identifies the Beetaloo Sub-basin as one of ten potential sources of new domestic gas supply. The Strategy notes that the NT has developed only around 4% of its known natural gas resources to date, highlighting the Beetaloo as an opportunity to address future supply gaps. Within this framework, development of the Beetaloo Sub-basin and NEA Pipeline directly aligns with Principle 3 of the Future Gas Strategy: 'Finding new sources of gas to meet demand'. The NEA Pipeline would provide a necessary route to market, enabling forecast gas volumes to reach eastern States and helping to maintain energy affordability and system reliability.

At a Territory level, the Northern Territory Government (2026) has positioned the Beetaloo as a cornerstone of its long term economic and energy strategy. The development of significant gas reserves in the Beetaloo Sub-basin is recognised as a significant economic opportunity for the NT and Australia. The NT Government states that studies and industry analysis predict that development in the Beetaloo Sub-basin could produce 13,000 jobs by 2040 and increase economic activity in the NT by \$17+ billion whilst delivering cheaper and more reliable gas across Australia for decades to come.

The business cases summarised in Table 1 outline the strategic importance and multifaceted impact of the development of the Beetaloo Sub-basin.

Table 1 Beetaloo Sub-basin market analysis and prediction

Project need
Southern states supply gap predicted from 2029 The Future Gas Strategy (May 2024), supported by its Analytical Report, forecasts an east coast gas supply gap emerging by 2028, concluding new gas supply is required to support the transition to a renewables-dominant energy system. The Australian Energy Market Operator (AEMO) Gas Statement of Opportunities (GSOO), March 2026, finds while near-term conditions are stabilising, there is medium-term uncertainty in southern states. It identifies that: • Supply gaps may emerge from approximately 2029–2030 requiring new investment; and • Multiple projects would be needed to meet demand over the 20-year outlook. Gas remains critical as firming capacity, supporting reliability as coal generation retires and renewable output varies. The Australian Competition and Consumer Commission (ACCC), in its June 2025 Gas Inquiry Report, similarly concludes that structural shortfalls are expected from 2028 unless new supply is brought online, broadly aligning with AEMO’s latest timing of shortfalls from approximately 2029.
Peak day supply shortfall predicted in 2028 for gas powered generation and 2027 for residential, commercial and industrial consumption The 2026 AEMO Victorian Gas Planning Report Update indicates that while peak day gas supply is forecast to meet demand through to 2028, system conditions remain tight with a high risk of shortfalls under adverse conditions. From winter 2029, increasing gas-powered generation demand and declining southern production contribute to a projected structural supply gap from 2030. In this context, the development of new gas supply sources is required to maintain reliability across the east coast market. The Beetaloo Sub-basin, supported by pipeline infrastructure such as the Project, represents a credible source of new supply capable of delivering significant gas volumes into eastern states, thereby helping to mitigate forecast shortfalls and improve system resilience in the early to mid-2030’s.
Beetaloo sub-basin development: National economic and security of supply opportunity Australia’s policy and industry settings strongly support developing the Beetaloo Sub-basin as a nationally significant economic and energy opportunity, with the Beetaloo Strategic Basin Plan (2021) projecting up to 6,000 jobs by 2040 and \$18–36.8 billion in additional economic activity (Beetaloo Strategic Basin Plan 2021). Infrastructure Australia (2020) identifies timely investment in pipelines and related assets as essential to unlock a significant quantity of gas within economically feasible extraction depths, aligning with Commonwealth priorities to strengthen energy security and supply. The NEA Pipeline would create a new delivery point into the eastern gas transmission system, enabling southbound flows of Beetaloo gas, enhancing security of supply and delivering sovereign economic value to nationally significant industries, jobs and populations. The Australian Petroleum Production and Exploration Association states that Beetaloo development could deliver substantial, stabilising public benefits through direct and indirect employment and by catalysing supply hubs, centres of excellence and training pathways for local residents in the NT (Northern Territory Government, 2018).

1.5.3 Additional capacity is required

The Sturt Plateau Pipeline (SPP), APA’s new DN300 diameter, 37 km long pipeline in the Beetaloo Sub-basin, will allow gas delivery into the existing AGP, providing crucial gas supply to Darwin. Gas flowing through the SPP is sourced from the Shenandoah South Pilot Project in the Beetaloo Sub-basin and is forecasted to be operational by Q3 2026.

Whilst able to support the pilot scale gas volumes produced in the basin, any ramp-up towards full scale production would quickly exceed available capacity in the AGP and the SPP.

1.5.4 Providing a route to domestic and export customers

The Proposal would deliver a connection to the ECGG and provide a potential route to market for Beetaloo gas to domestic and export customers.

The commissioning and operation of the SPP by Q3 2026 signifies the commencement of commercial gas production in the Beetaloo Sub-basin, delivering up to 40 Terajoules (TJ) of gas per day to Darwin for domestic and industrial usage.

Whilst security of domestic supply is a key focus of the Proposal, the estimated volume of gas within the Beetaloo Sub-basin (approximately 200,000 PJ) is approximately 1,000 times greater than Australia's current annual domestic gas consumption (Australian Government, 2021). Whilst the total gas volume within the basin may not be 100% recoverable, sufficient volume to supply both domestic and export needs is anticipated.

The Proposal would provide flexibility to the market to generate both domestic and international gas supply from the Beetaloo Sub-basin with the ability to adjust supply to these markets to meet the seasonal domestic demand as required. This connectivity could increase market optionality for producers, support scale development of the Beetaloo resource, and strengthen supply integration between northern gas developments and east coast export markets.

Development, construction and operation of the Project transporting gas to the ECGG transmission network would not exclude future development of a larger pipeline north to Darwin. Estimated gas reserves within the Beetaloo Sub-basin are sufficient to support both concepts.

1.6 Studies undertaken to inform this Report

The following studies have been undertaken to inform this Report:

- multi-criteria analysis (MCA) of site selection of pipeline corridor
- desktop ecological (flora and fauna) assessments and verified by on ground surveys
- water crossing assessment using satellite and on ground surveys
- desktop heritage and cultural assessment
- desktop surface water and groundwater conditions investigation
- impact scoping, informed by early stakeholder engagement

2. Proposal description

The purpose of this section is to describe the Proposal, including its location, key infrastructure and key activities, to provide context for the environmental impact assessment presented in this Report.

2.1 Proposal scope

The Proposal comprises the following:

- The construction and operation of an approximately 662km pipeline comprising of:
 - An 80km collection header pipeline from import station of Compressor station 1
 - ~582km export pipeline between Compressor station 1 to the NT/QLD border
- Installation of associated above ground infrastructure and cathodic protection system
- Establishment of 4m wide operational access track
- Supporting temporary infrastructure for construction, including:
 - Accommodation camps including workshop, offices and laydown yards
 - Pipe stockpiles and material laydowns with ancillary equipment
 - Access tracks (upgrade existing and new)
 - Groundwater bores for water extraction for construction and commissioning
 - Turkey nests
 - Extra work areas
 - Borrow pits

2.2 Proposal area

For the purpose of the environmental assessment, two key areas have been defined to describe the Proposal area and evaluate its potential impacts. These areas are shown in Figure 4, and summarised in Table 2.

Table 2. Description of the key Proposal areas

Key Areas	Descriptions
Proposal area	~78,744 ha For assessment purposes, the Proposal area has been defined as a broad envelope encompassing: • a 1km wide corridor for the Pipeline and deviation options currently under consideration (500m either side of the centreline). • a 100m wide corridor around access tracks (50m either side of the centreline) • a 100m wide buffer (50m around the areas) around construction camps, laydown areas and ancillary facilities, where these are not already captured within the 1 km-wide pipeline corridor. This Proposal area has been adopted to capture the maximum extent of potential environmental interactions and is substantially larger than the forecast disturbance footprint. To provide flexibility for final pipeline alignment and construction requirements, a 200 m-wide allowance corridor for the pipeline has been adopted. Disturbance within this corridor would primarily occur within a 45 m-wide CRoW, with additional disturbance limited to areas required for access, laydown areas, temporary work areas, water management structures and other ancillary construction infrastructure.

Key Areas	Descriptions
Disturbance footprint	~4,703 ha This includes the CRoW footprint, construction camps, pipe stockpiles and provision for installation of anode beds, associated access tracks for construction and the operational access track. • Construction footprint: Areas temporarily disturbed during construction (refer to Table 6) that would be reinstated progressively. • Access tracks: 731km of access tracks have been identified for assessment during the Project's concept phase. These would be refined over time to reach a residual network of access tracks required to support access to the CRoW. This would consist of: - o Existing tracks with no further upgrade or improvement - o Existing tracks that require upgrade and/or widening - o New tracks or extension of existing tracks beyond their present extent. It is estimated that the access tracks could disturb approximately 1,448 ha of land (existing disturbance and new disturbance). Operational footprint: ~409 ha • Operational access: A 4m wide access track would be maintained for operational and maintenance purposes plus above ground facilities. It is estimated this operational access track would be 267ha. • Compressor stations: An estimated 16 ha would be retained along the pipeline for the compressor stations. • Access tracks: An estimated 126 ha of tracks (existing disturbance and new disturbance) may be retained to access the 4m wide access track.

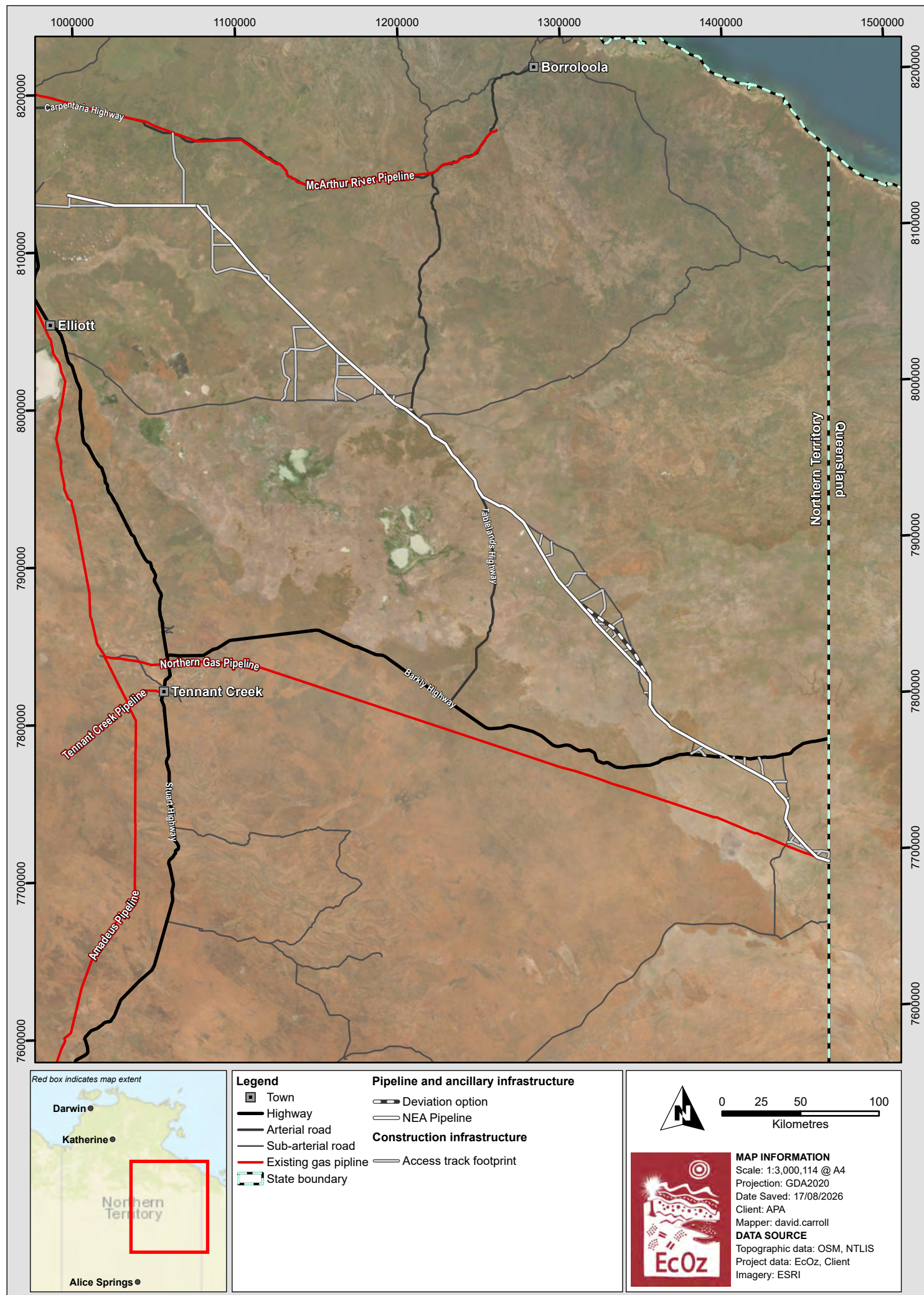


Figure 3. Map of proposal area

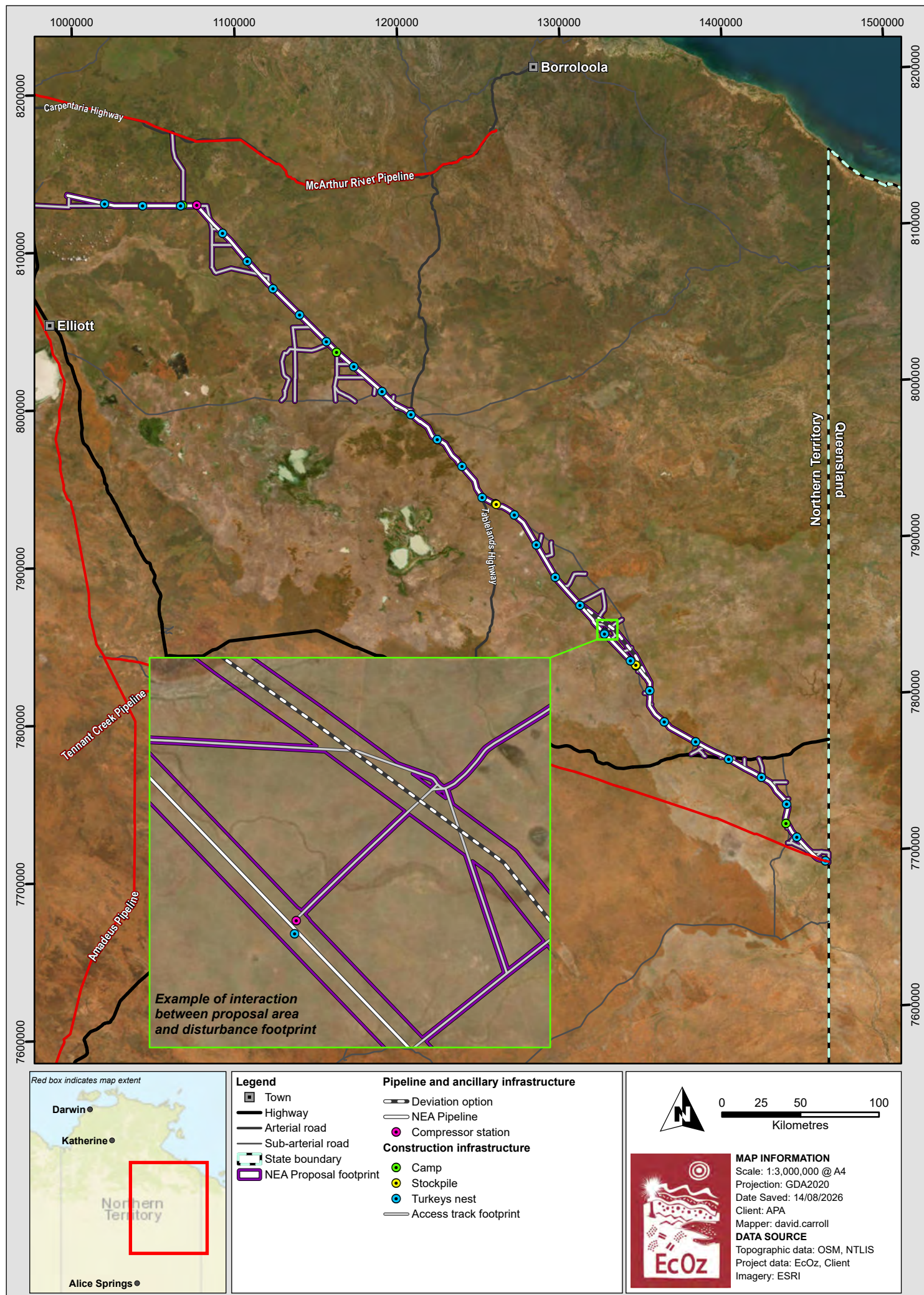


Figure 4. Key assessment areas

Table 3. Breakdown of Proposal footprints

Project Component	Maximum Construction Disturbance (ha) ¹	Rehabilitated Following Construction (ha) ¹	Operational Footprint (ha) ¹
Construction ROW (inc. Main line valve stations footprints) ²	2,978	2,711	267
Extra Workspace Areas	26	26	0
Turkey Nest Dams	95	95	0
Temporary Construction Camps	124	124	0
Compressor Stations	32	32	16
Cathodic Protection Systems	0.2	0.2	Negligible
Access Tracks	1,448 (730.5km)	1,322 (660.9km)	126 (69.6km)
Total (ha)	4,703	4,294	409

2.3 Land use and tenure

The Proposal is located approximately 500 km south-east of Darwin and traverses predominantly pastoral land within the Roper Gulf and Barkly regions. The Proposal is generally remote from major population centres, with the nearest sensitive receptors comprising pastoral homesteads located on properties intersected by the Proposal. Nearby communities within the broader area include Elliott, Daly Waters, Alpurrurulam and Camooweal.

Historic and current land use within the Proposal area broadly includes some disturbance, pastoral activities and exploration activities for mining, oil and gas. Pastoral activities common in the area include cattle grazing with associated groundwater extraction for stock watering. The land use of the Proposal area and surrounding areas are summarised in Table 4 and pastoral stations and homesteads are depicted on Figure 2.

¹ Rounded to the nearest whole number except for Cathodic Protection Systems

² This is the maximum CROW footprint based on the longest possible route, which is the deviation option.

Table 4. Summary of Proposal area and surrounding land use and tenures

Coordinates	Refer to Appendix A
Zoning	Not located inside any Town Planning Zones
Tenure	Perpetual Pastoral Leases Freehold Land
Nearest homesteads	2.5km southwest of Anthony Lagoon Homestead 3km south of Avon Downs Homestead 5km north of Austral Downs Homestead
Nearest residential community/towns	50 km north of Alpururulam 75 km south of Daly Waters 85km north of Elliot
Nearest regional centres (available health services, education, administration etc)	230km north of Tennant Creek 300km south of Katherine
Local Government Areas	Roper Gulf Regional Council and Barkly Regional Council
Surrounding land uses	Pastoral activity, mining, oil and gas

2.4 Proposal exclusions

Table 5 below summarises the activities that are excluded from the Proposal scope and assessment under the EP Act.

Table 5. Components excluded from the assessment.

Component	Description
Upstream gas gathering and gas processing	Gas gathering or gas processing activities, these would be subject to separate approvals.
Pipeline movement via established transport corridor to intermediate pipe stockpiles remote from the pipeline corridor	Pipe movement logistics from port to intermediate pipe stockpile locations are presented for context and do not form part of the scope. Intermediate pipe stockpile locations would be subject to separate local planning development applications and consultation with relevant stakeholders.
Public road upgrades	Public roads are assets of the local council or the Territory road authority. Any upgrades that relate directly to access from a public road to a private road, track or access is considered within scope. Any general public road upgrade program that is remote from connection to the pipeline corridor is out of scope.
Future Collection Headers	Collection Header #1 is included in the Proposal. Any future pipeline headers are not included, as they are only conceptual at this stage. The construction, commissioning, and operation of additional Collection Headers associated with the Proposal would require the relevant permits and approvals of the time prior to construction.

2.5 Key components

Table 6 provides a summary of the key components of the Proposal, the location of these components are depicted in Figure 3, noting the temporary infrastructure locations are conceptual. Due to the remote location of the Proposal, ancillary infrastructure would be required to support construction and commissioning activities. This temporary infrastructure is distinguished from the operational infrastructure, which is necessary for the ongoing operation of the pipeline. Locations are indicative and would be refined through further design and environmental and cultural heritage assessments.

Table 6. Key Proposal components

Component	Description
Buried pipeline	See Table 7 for pipeline technical aspects.
Ancillary infrastructure (for operations)	Within the access track: • Pipeline markers within the operational access track • Cathodic protection test points and power supply units Not within the access track: • MLV stations (25 x 25m plus provision for fenced compound) • Scraper stations (25 x 25m plus provision for fenced compound) • Compressor stations which include scraper stations and telemetry and monitoring equipment (250m x 250m plus provision for fenced compound) – see Figure 5 for indicative layout. • Cathodic protection – buried anode beds (to be located approximately 350m from buried pipeline)
Ancillary infrastructure (temporary)	Within the CRoW: • Turkeys nest dams. The feasibility of using in situ turkey nests in strategic locations within the CRoW to recycle hydrotest water is being investigated – see Figure 6 placement and layout. • Special crossings at watercourses • Pipe stockpiles and vehicle turn arounds Not within the CRoW: • Construction camp and storage areas • Groundwater bores (existing and new) • Extra workspace areas • Borrow pits



Figure 5. Indicative compressor station layout



Figure 6. Example of turkey nest placement and layout

2.5.1 Pipeline corridor

The Proposal corridor was informed by a MCA that evaluated and compared route options against a range of publicly available environmental, social, technical, and cost criteria. The MCA identified a preferred pipeline corridor that avoided key sensitive environmental and social values.

The preferred corridor was further assessed through additional environmental studies to refine the pipeline alignment and, where possible, avoid site-specific sensitivities. This refined assessment corridor forms the basis of the Proposal location (referred to as Revision 1 corridor) (see Figure 3).

The Proposal corridor also currently includes a potential deviation around Exploration Lease (EL) 32497 to avoid interaction with proposed exploration activities. Both route options have been assessed as part of this Report, however ultimately only one corridor would be constructed.

2.5.2 Pipeline technical aspects

Table 7 provides an overview of the technical aspects of the pipeline for the Proposal.

Table 7. Pipeline technical aspects

Component	Description
Length	Approximately 662 km
Product Transport	Sales quality Natural Gas
Material	X70 grade steel
Coating System	Dual layer fusion bonded epoxy anti-corrosion coating with specialist field joint coating applied over the welded joints.
Nominal Diameter	Collection header #1: up to DN1200 (48 inches or 1219mm OD) Compressor station #1 to NGP tie-in: up to DN1200 (48 inches or 1219mm OD)
Pipe Wall Thickness	Notionally 22.2 mm
Depth of Cover	Typically, 750mm minimum depth of cover. Pipe would be buried deeper at special crossings or where otherwise identified during Pipeline Safety Management Study.
Design Pressure/ Maximum Allowable Operating Pressure (MAOP)	Class 900 15.3MPag
Cathodic Protection System	Impressed Current
Design Code	AS2885 Pipeline Systems – High Pressure
Design life	40 years

2.5.3 Roads and access track requirements

A desktop assessment was undertaken by APA to identify and evaluate all the roads and access tracks in proximity to the pipeline corridor. This was validated and verified through the constructability assessment undertaken in December 2025, during which several access track options were identified. These would be reduced and refined over the Proposal's detailed design phase to a final set of proposed construction access tracks that would be utilised during the Proposal's construction, adopting the principles of avoidance and minimisation of any sites of existing value in the selection process.

In selecting preferred access tracks, the following hierarchy of preference has been applied:

1. Sealed road
2. Gravel road (refer to Figure 7 for typical layout)
3. Formalised track (refer to Figure 8 for typical layout)
4. Rough track
5. New tracks required to be constructed (adopting the principles of avoidance and minimisation)

APA has identified several existing tracks will require upgrades for heavy vehicle traffic. Additional access tracks would also need to be constructed in locations where no existing access tracks are available.

Permanent all weather access tracks would be established to the compressor stations and a 4m wide access track would be retained along the pipeline right-of-way to facilitate ongoing operational access.

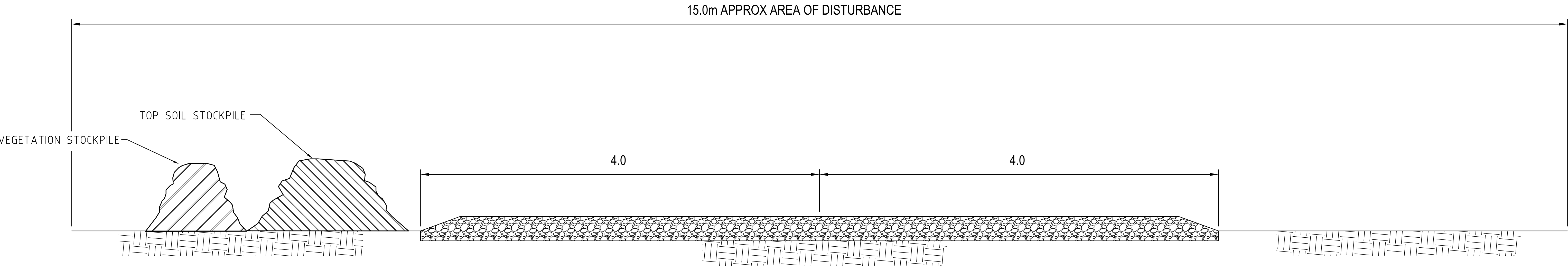


FIGURE 7. IMPORTED GRAVEL SHEETED ACCESS TRACK LAYOUT

NOTES:

1. DIMENSIONS ARE IN METERS UNLESS OTHERWISE NOTED
2. ACCESS TRACKS WIDTH MAY BE INCREASED BASED ON SITE REQUIREMENTS,
3. VEGETATION AND TOP SOIL SHALL BE STRIPPED PRIOR TO SUBGRADE EARTHWORKS

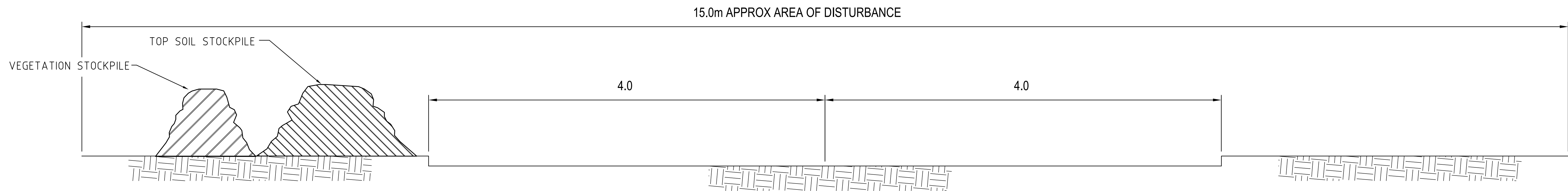


FIGURE 8. TYPICAL UNSHEETED (NATURAL SURFACE) ACCESS TRACK LAYOUT

NOTES:

1. DIMENSIONS ARE IN METERS UNLESS OTHERWISE NOTED
2. ACCESS TRACKS WIDTH MAY BE INCREASED BASED ON SITE REQUIREMENTS,
3. VEGETATION AND TOP SOIL SHALL BE STRIPPED PRIOR TO SUBGRADE EARTHWORKS

2.6 Key activities

The key activities are described in different lifecycle phases; Each of these activities will be undertaken in accordance with the Australian Pipelines and Gas Association (APGA) *Code of Environmental Practice Onshore Pipelines 2022*.

Table 8 provides a list of the key activities for each phase of the Proposal. The subsequent sections provide a description of each of these key activities.

Table 8. Key activities

Proposal phase	Key activities
Construction	• set up of temporary pipe and/ or material stockpile locations • site access • mobilisation of construction camps and workshops • vegetation clearing, grubbing and grading • pre-trenching and backfilling (select sections). • trenching • trenchless crossing (Barkly and Tablelands Highways) • stringing, coating, joining and testing • pipelaying and backfilling • installation of above ground infrastructure
Commissioning	• cleaning, pipeline inspection gauge and drying • hydrostatic testing • pipeline purging
Reinstatement and rehabilitation	• reinstatement and rehabilitation • completion and handover
Operation	• operation, monitoring and maintenance of the buried pipeline • operation, monitoring and maintenance of the above-ground infrastructure
Decommissioning	• cleaning and abandonment of buried pipeline • removal of above ground infrastructure • notification to the regulatory authority

2.6.1 Construction

The construction activities, excluding the construction camp and pipe stockpile and laydown areas, will occur within the CRow. For context, Figure 9 provides an overview of a typical CRow layout.

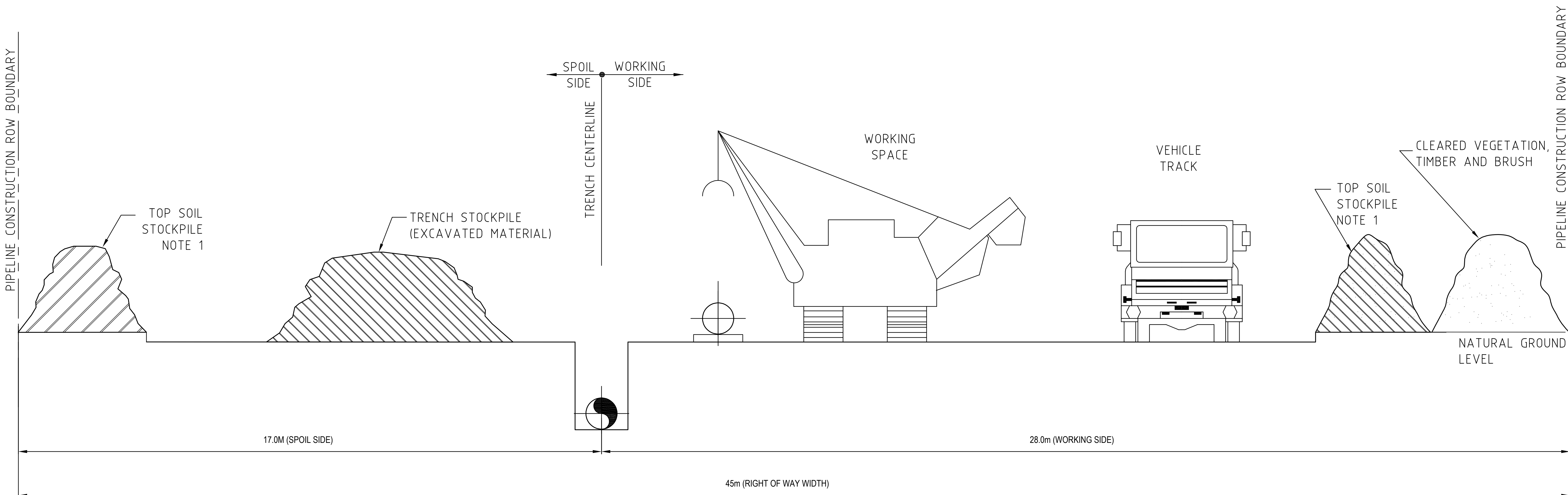


FIGURE 9. TYPICAL CONSTRUCTION ROW LAYOUT - CONVENTIONAL 45m WIDTH

NOTES :

1. TOP SOIL SHALL BE STRIPPED FROM RIGHT OF WAY AND STOCKPILED SEPARATELY FROM SUB SOIL. TOP SOIL SHALL NOT BE STOCKPILED AGAINST FENCE OR DRAINAGE LINES. TOPSOIL STOCK PILES SHALL BE KEPT FREE OF DEBRIS.

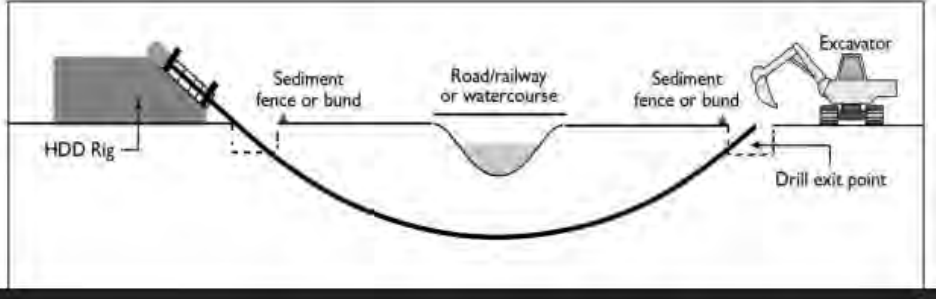
Table 9 provides a summary of the scope of the key construction activities, noting that construction of the pipeline will be progressive and sectioned along the CRoW, and the sequence of activities is subject to change based on (but not limited to) material availability, environmental constraints and crew availability.

Table 9. Key construction activities

Key activities	High level scope
Set up of temporary pipe stockpile locations	- At camps 3 and 4. - Up to 25 ha each, with the number, size and dimension of the locations subject to further analysis.
Site access	- Upgrading existing and establishing new access tracks to enable suitable access to the CRoW for heavy vehicle usage. - Upgrading existing access tracks will be prioritised, with upgrades proposed to include widening and tidying of vegetation from the edges of the tracks to allow safe access for pipe infrastructure and materials delivery by heavy vehicles. - Upgrading existing access tracks would be prioritised, with upgrades proposed to include widening and tidying of vegetation from the edges of the tracks to allow safe access for pipe infrastructure and materials delivery by heavy vehicles. - New tracks would be constructed from appropriate gravel material. - An operational access track would remain for operations, for the purpose of accessing above ground facilities. - Section 2.5.3 provides an overview of the roads and access tracks desktop review.
Mobilisation of construction camps and worksites	- Five camps, each with a maximum 500 personnel capacity spaced approximately 150km apart along the CRoW. - Each camp would be progressively mobilised and demobilised aligning with the sequenced construction of the pipeline. - In addition to providing quarters for sleeping, food storage and preparation, eating and recreational activities, the camps would also contain: - pipe laydown (camp 3 and camp 4 only) - materials storage areas - generators to power the camp - firefighting system - project management offices, reception, lockers and training rooms 4wd parking - plant and equipment laydown and workshop - vehicle hygiene station; - vehicle fuel store and refuelling - water bore, storage and treatment systems - septic system and wastewater irrigation field - Reinstatement and rehabilitation of disturbed areas after demobilisation in accordance with Property Management Plans.

Key activities	High level scope
Vegetation clearing, grubbing and grading	• Pre-clearance surveys. • Suitably experienced ecologists or fauna spotter / catchers would be present during clearing. • Trimming or removal of trees, shrubs, stumps and other vegetation. • Cleared vegetation would be stockpiled and moved into the windrows. • Topsoil removed by grading would be stockpiled for reuse during reinstatement and rehabilitation. • Topsoil would be managed in accordance with a Topsoil Management Plan prepared in accordance with the APGA Code of Environmental Practice Onshore Pipelines 2022.
Pre-trenching and backfilling (where required).	• Pre-trenching and backfill would be required where rock is near-surface. • Excavators with rock breaker attachments would pre-break rock in the trench, then backfill.
Trenching	• Standard trenching activities in accordance with the APGA Code of Environmental Practice Onshore Pipelines 2022. • 24-hour continuous trenching activity would be investigated. • Trench excavation depths would typically be 750mm minimum cover, except for watercourse and trenchless crossings • The duration of open pipeline trench is heavily dependent on access and proximity to construction camps. Sections that have a longer separation of access points would be required to remain open for longer.
Trenchless crossing	• Detailed geotechnical investigations and analysis to confirm ground conditions, assess environmental risks, and determine the suitability of the proposed methods and final design parameters. • Thrust boring used where the pipeline will intersect the Tablelands and Barkly Highways. Schematic of this method provided in Figure 10. Plan View (not to scale) Profile (not to scale)

Figure 10. Schematic profile of typical thrust boring method.

Key activities	High level scope
	- Horizontal direction drilling (HDD) may be utilised to minimise impact on sacred sites or cultural heritage sites where ground conditions are suitable. Schematic of this method is provided in Figure 11. - Each HDD crossing would require installation of an above ground mud return line within the CRow. Depending on site conditions, supplementary access may be required as a contingency measure.  Figure 11. Schematic profile of typical HDD method (Source: APGA 2022).
Stringing, coating, joining and testing	- Pipe laid along the trench or pre-trench line (referred to as 'strung pipe'). - Strung pipe prepared for welding into continuous lengths, with each weld tested. - Surface join post-welding cleaned by grit-blasting or wire brushing, and corrosion inhibitor applied. - Joins coated to protect the welds.
Pipelaying and backfilling	- Before pipe laying, dependant on the rock or soil type, padding machines may be used to sift the excavated subsoil, retain fine material to pad beneath the pipe and to protect the pipe coating. - Joined pipe lowered into the trench using side-boom tractors or excavators. Dewatering of the trench may be required. - Trench backfilled with excavated material and compacted.
Installation of above ground infrastructure	- Construction undertaken where required as the pipeline is constructed. - Consisting of prefabricated and constructed on site materials.
Cleaning, pipeline inspection gauge and drying	- Internal of the pipe cleared, inspected and dried before hydrostatic testing. - Also undertaken post-hydrostatic testing before gas introduction.
Hydrostatic testing	- Pipeline divided into hydrotest sections with hydrotesting undertaken as a continuous 24-hour operation for each section. - Temporary water storage facility (e.g., a turkey-nest dam) constructed adjacent to the designated fill point. Above ground infrastructure (as required) commissioned progressively. - Existing groundwater bores utilised where possible. Where no suitable bore exists, a new groundwater bore would be established. - Use of chemicals for hydrotesting depends on the quality of water to be used. If required, eco-friendly chemicals would be sourced. All chemicals would be stored in accordance with Australian Standards. - Hydrotest water would be reused for multiple hydrotest rounds.

2.6.2 Commissioning

Commissioning of the pipeline and above ground infrastructure is required before operational activities. Pipeline commissioning would be undertaken in accordance with the AS 2885.1 and the APGA *Code of Environmental Practice Onshore Pipelines 2022*. Table 10 provides a summary of the key commissioning activities.

Table 10. Key commissioning activities

Key activities	High level scope
Pre-commissioning	- Cleaning and continuity testing - Testing and preparation for operation of equipment and control systems - Establishment of safety systems and remote monitoring and control
Pipeline purging and introduction of gas	Purging of air and introduction of natural gas to the pipeline and equipment
Equipment commissioning	- Commissioning of all operational equipment demonstrating conformance with design - Performance testing and handover to operations

2.6.3 Reinstatement and rehabilitation

Reinstatement and rehabilitation are the final stage of construction.

The CRoW would be progressively reinstated in accordance with each Property Management Plan (PMP); a document prepared in consultation with each landholder specifying all commitments that APA would undertake during the construction phase of the Proposal.

Once a section of pipeline has been installed between access points and activities are complete, any areas of compacted ground within the CRoW would be broken up before the windrowed topsoil is respread evenly. Once respread, the topsoil would be left to naturally regenerate using seed stock within the topsoil.

Reinstatement at road crossings and across public land would be subject to the conditions of crossing deeds (or equivalent agreement) and the provisions of the APGA *Code of Environmental Practice Onshore Pipelines 2022*. Conditions may be imposed by regulatory permits, licences or approvals that would require additional reinstatement measures. These requirements are generally applied around watercourses, riparian corridors or areas of ecological sensitivity or value.

All reinstatement and rehabilitation requirements would be compiled into a Reinstatement and Rehabilitation Plan. The plan would also detail commitments to monitoring and maintaining rehabilitation once complete.

2.6.4 Operation

The expected operational timeframe of the Proposal is 40 years based on the Beetaloo Sub-basin resource. Operations would be undertaken in accordance with the:

- APGA *Code of Environmental Practice Onshore Pipelines 2022*
- Pipeline licence conditions under the *Energy Pipeline Act 1981*
- AS 2885.3 :2022 Pipeline Systems — High Pressure, Part 3: Operation and maintenance

Table 11 provides a summary of the scope of the key operational activities.

Table 11. Key operation activities

Key activities	High level scope
System operation and control	- The pipeline system would be remotely operated and controlled from APA's Integrated Operations control room, via SCADA and telemetry systems. - Facilities such as compressor stations along the pipeline would also have on-site control rooms for local operation and control when required.
Pipeline corridor maintenance	For the life of the asset, patrolling and maintenance of the pipeline corridor would occur. Patrolling would occur both from aircraft and from the ground and would monitor line-of-sight and marker sign condition, vegetation and weeds, detect erosion and subsidence, and identify any encroachment or threats to the pipeline's safety and integrity.
Buried pipeline inspection and maintenance	- The safety and integrity of the pipeline is monitored by a range of routine activities, including cathodic protection testing and Direct Current Voltage Gradient (DCVG) surveys, in-line inspection using intelligent pigs, and other inspection and non-destructive testing methods. - Periodic repairs and maintenance may be required through the life of the pipeline. Where identified by inspection or monitoring, rectification works may be required, such as excavation, repair and recoating of the pipeline, upgrade or replacement of cathodic protection or other works as deemed necessary by engineering analysis.
Above ground facilities operation and maintenance	Above ground facilities require routine inspection and maintenance, ranging from visual inspections, operational checks, preventative maintenance, corrective maintenance, through to major overhauls, and end-of-life replacement of equipment. Requirements are managed through a computerised maintenance management system and executed by APA and contractor personnel.

2.6.5 Decommissioning

The decommissioning of the pipeline and the above ground infrastructure would be undertaken in accordance with the *APGA Code of Environment Practice Onshore Pipelines 2022* and pipeline licence conditions under the *Energy Pipelines Act 1981*. The aims of the decommissioning methodology (APGA 2022) are to:

- Leave the easement in a condition that is as near as practicable to pre-existing environmental conditions.
- Decommission the pipeline in a manner that minimises potential impacts to the environment, land use and third Parties.

Before decommissioning, an environmental risk assessment process and a broader technical assessment would determine the most suitable pipeline decommissioning methodology.

2.6.6 Land Access

2.6.6.1 Land access strategy overview

APA would adopt the following best practice engagement principles for negotiations with landholders:

- Be proactive and engage early about potential activities and provide landholders with the information necessary to inform decision making. Also provide regular progress updates.
- Interact respectfully and transparently. Be respectful in all dealings, respect rights, privacy and activities of the landholder.
- Promote understanding and listen to landholders. Appreciate the impact and ensure there is a common understanding.
- Act with integrity and comply with the relevant frameworks.

It is APA's intention that voluntary agreement would be reached with each landholder.

A summary of the landholder engagement conducted prior to the submission of this Report is provided in Section 5.

2.6.6.2 Public land management

Most of the land within the CRoW is pastoral leasehold issued and maintained under the *Pastoral Land Act* 1992. These are long term leases that grant grazing rights to the leaseholder. Road corridors tend to be unallocated Crown land.

APA would engage public land managers to obtain a licence or crossing deed before applying for a pipeline licence.

2.6.6.3 Mining, mineral and petroleum interests

There are several mining, mineral and petroleum tenures that overlap the Proposal. Status of these interests range from application to fully granted resource production. APA commenced engagement with these proponents in 2025, a summary of the engagement prior to the submission of this Report is provided in Section 5.

2.6.6.4 Third party asset owners and interests

A 'Before You Dig' process and tenure searches have identified existing assets that the pipeline may cross, including gas pipelines, optic fibre cables and power lines.

Engagement with third party asset owners and future planned asset owners has commenced with the intent obtain crossing agreements with each asset owner.

The provisions of AS2885 describe the minimum expected protection measures that should be applied to the design and construction of new pipelines in proximity of existing 3rd party assets.

2.7 Other Proposal elements

In addition to the physical infrastructure, the Proposal also includes other components such as workforce, transport, water and energy use, and waste management. The requirements for each of these components are outlined in Table 12.

The needs of these components differ between the construction, commissioning, and operational stages, so each phase is described separately. The definitions of the key activities for each phase of the Proposal are discussed in Section 2.6.

Table 12. Other proposal elements

Component	Phase	Description
Workforce	Construction Commissioning	It is anticipated that the Proposal construction workforce would peak at approximately ~1,000
	Operations	An additional 15-20 new positions would be required for operation of the pipeline. These positions would be split between the APA corporate offices (Darwin, Brisbane, or Perth) and regional operational offices.
Transport	Construction Commissioning	Infrastructure and materials Pipe infrastructure would likely be delivered via the Darwin and Queensland ports. Logistic specialists have been engaged to assess port capacity, rail capacity and road capacity for the intended pipe transportation and associated traffic movements during construction and commissioning phases. Compressor station components and main line valves would be fabricated remotely and transported to site via port, rail and/or road. Construction materials, machinery and equipment would then be transported to site in heavy vehicles. Workforce Workforce would be transported to/from site in light vehicles each day. Construction materials and plant would be transported to/from site in heavy vehicles.
	Operations	Transport of personnel and delivery of maintenance materials, deliveries, machinery and equipment would be via existing roads and constructed access tracks. Operational activities would be small scale and periodic, reflecting scheduled maintenance activities.
Water Total Estimated water consumption: 980ML over construction and commissioning	Ongoing	Water would be sourced from existing and new groundwater bores within the Proposal area, with approximately 6 new bores expected (subject to detailed assessment). The locations of new bores would be determined in consultation with relevant local stakeholders, allowing opportunities to consider potential long-term legacy benefits beyond the needs of the Proposal. Some bores may be maintained for the life of the Proposal to service operational maintenance and decommissioning activities. An overview of the estimated water consumption for each phase is provided below.
	Construction Commissioning	Three key activities would consume water during the construction and commissioning phase. Details of these activities and estimated water consumption are provided below. Construction camps Potable water of ~10.75ML per camp would be required. Total estimate is 161.25ML (5 camps x 10.75ML) over 3 years.

Component	Phase	Description
		General construction activities Total estimate is up to 757 ML over 3 years for vehicle hygiene, dust suppression, access track construction and maintenance, erosion prevention and general use. Trenchless crossings to support HDD Provisional estimate is 3.5 ML as required over 3 years. Hydrotesting activities Total estimate is 188ML, excluding reuse options under investigation that would reduce this volume. The inclusion of turkey nest infrastructure in the disturbance footprint has been included in this assessment.
Energy	Construction	Stationary and mobile construction equipment would be powered by diesel fuel. High level estimate for fuel use for all construction activities in standard terrain would be ~30,000 litres per day
	Commissioning Operations	Gas powered compressor units would be used due to reliability and high level of operability. Supplemental solar power may be considered.
Waste	Construction Commissioning	Waste products from the construction camps would be segregated and include general organic and non-organic materials, recyclable, treated septic/grey wastewater. Waste produced from the joining, testing and coating of the pipeline, would be limited to steel offcuts, hazardous chemical containers, grit blasting waste and general construction waste. Hydrotest water would be discharged from purpose-built containment structures (turkeys' nests). Discharge would occur at a controlled and gradual rate over approximately 48–72 hours at the end of commissioning.
	Operations	Waste produced from operations would be minimal and would be segregated and disposed of at licenced waste service facilities.

Component	Phase	Description
Hazardous substances	Construction Commissioning	Each construction camp site will have a mobile plant/machinery service area which will be set up to store/handle hazardous chemicals. Hazardous chemicals that would be stored include: • Fuels • Hydraulic oils and greases • Batteries • Water treatment chemicals • Weed killer (for maintenance of camps) • Pipe field joint coating (before application)
	Operations	Maintenance of heavy vehicle equipment and light vehicles during operation would be undertaken offsite. Maintenance of pipeline infrastructure would include typical industrial lubricants, fuels, coatings, other miscellaneous chemicals, coating materials and cleaning supplies. All hazardous materials would be transported and stored in accordance with relevant statutory requirements. Fuel containers would be transported on light vehicles for refuelling situations.

2.8 Schedule

Table 13 provides a summary of the estimated timeframes for the Proposal.

Table 13 Estimated Proposal milestones

Activity	Timeframe
Final Investment Decision	July 2028 – January 2031
Detailed design	12 months post FID
Procurement & pipe delivery	Approximately 24 months post FID
Early works	6 months pre-earthworks
Construction commencement	August 2029 – August 2031
Practical completion	October 2030 – April 2033
Commissioning	2 months post-practical completion
Commence operation	January 2031 – June 2033
Decommissioning	End of operational life

3. Alternatives and site selection

The section examines the various scenarios and alternative designs for the pipeline corridor that were considered by APA before deciding on the Proposal presented in this report.

3.1 Do nothing approach

Should development of the Beetaloo Sub-basin proceed without the Project, it would likely constrain supply of gas due to the capacity constraints on the existing infrastructure. The capacity constraint implies that the Project is required to fully meet the forecast demand from east coast customers (subject to alternative gas resources available for production).

AEMO's Gas Statement of Opportunities 2026 forecasts a significant increase in domestic gas powered generation. *"By 2035, gas demand is forecast to become even more dependent on available renewable generation across the seasons. Under extreme conditions, forecast gas powered generation demand exceeds 1,000 TJ/d for more than 35 days and, if electricity demands peak at times of low coincident renewable availability, may surpass 1,750 TJ/d, nearly double historical levels during the winter"* (GSOO 2026).

Without gas supply to 'firm' or balance energy supply generated by renewables, it places additional risk on the ability for renewable energy generators to fulfil supply commitments which in turn acts as a barrier to new and sustained renewable development.

3.2 Utilisation of existing gas pipeline infrastructure

Whilst it would be possible to re-design the existing gas transmission network to increase flow gas into the East Coast gas transmission network via the AGP, NGP and CGP, these existing pipeline assets are critically undersized and limiting. Expansion of these assets via additional compression provide limited incremental increases in transport capacity due to the size (diameter) of these existing pipelines and distances they cover.

In development of the Project, if APA were to follow the routes of the existing AGP, NGP and CGP, it would require an additional 250 km minimum of pipeline length. This would indicatively represent a ~17% increase in pipeline manufacture, transportation and installation which is not a feasible consideration.

3.3 Site selection methodology

3.3.1 Multi-criteria assessment

A broad assessment area of a 1km wide pipeline assessment corridor was defined and analysed by placing a weighted assessment across seven main input criteria (infrastructure, planning, land tenure, topographic, water/flooding, environmental and heritage) (see Figure 12). The pipeline corridor then evolved following a desktop MCA assessment to minimise impacts on landholders, communities and the natural and built environment since conceptualisation. The assessment process used a computer algorithm that was then reviewed and refined by a team of subject matter experts to determine a preferred pipeline corridor.

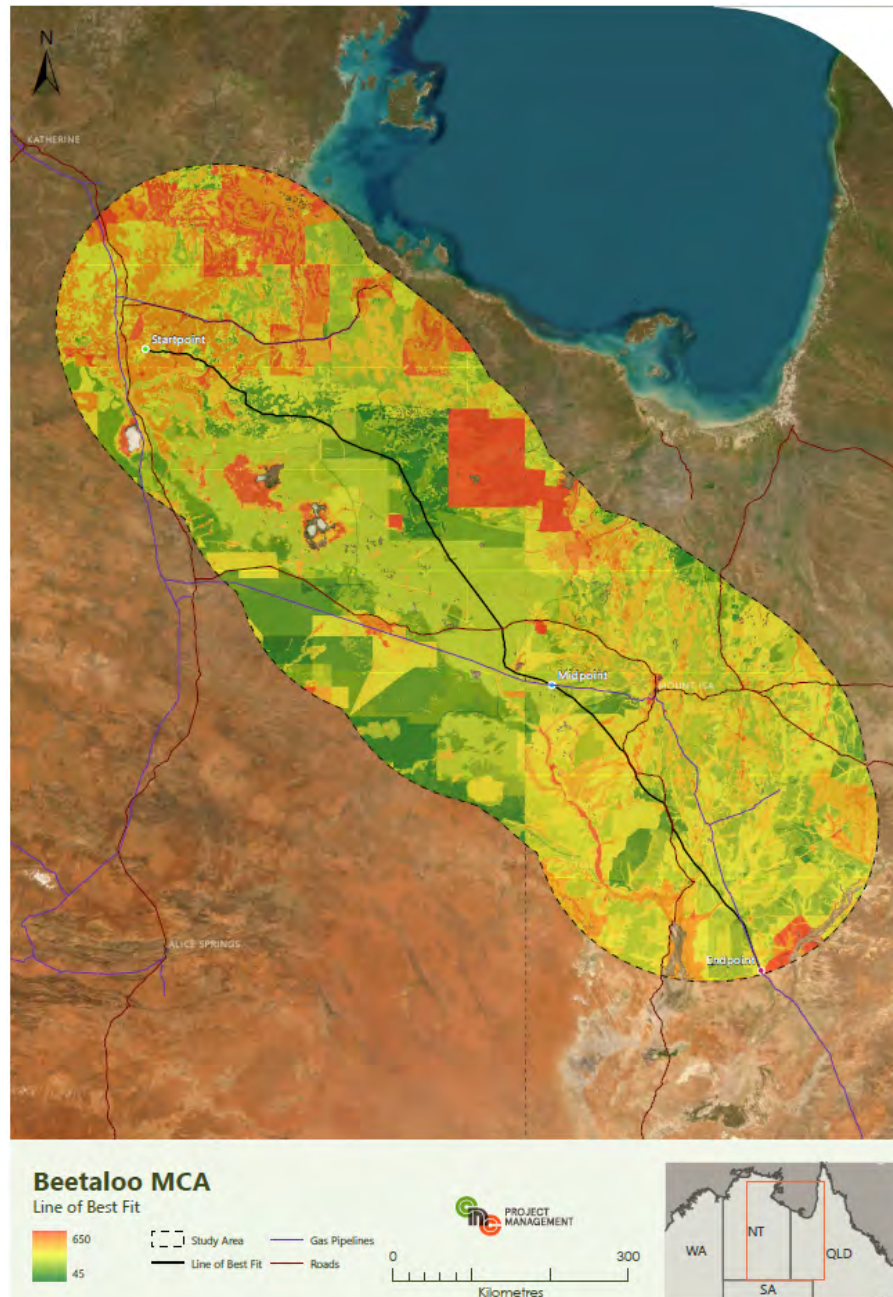


Figure 12. Extent of multi-criteria analysis (Credit: CNC Project Management)

3.3.2 On ground surveys

3.3.2.1 Constructability surveys

The MCA provided a basic corridor that was rationalised by APA's constructability team. The constructability team focused on ease of access, path of least resistance, avoiding mature vegetation and selecting perpendicular crossings of watercourses and roads. These surveys were undertaken in late November to early December 2025 following receipt of the Proposal's Pipeline Permit under the *Energy Pipelines Act*.

The Revision 1 Pipeline Corridor forms the basis for refined environmental and cultural heritage assessment and Project referrals with the intent that the final proposed disturbance corridor would be refined following further detailed design, modelling and on-ground assessment in coming months and years.

Following completion of technical studies (including geotechnical assessment), the pipeline corridor would reduce to a 200m wide pipeline route for the purpose of pipeline licencing in the NT. The CRoW would be up to 45m wide and would be established within the 200m wide licenced corridor with additional workspace, vehicle turnarounds, turkey nest dams and access being established where required.

Beyond the CRow, access tracks, construction camps and associated laydown areas and ancillary facilities (car parking, vehicle wash down, site offices, workshops, etc) as well as compressor station footprints, main line valve compounds and anode bed locations would combine to form the overall Proposal disturbance footprint.

3.3.2.2 Ecology surveys

Ecological studies have informed the selection and refinement of the pipeline and above ground infrastructure by identifying environmental values that should be avoided or managed during detailed design. The ecological assessment incorporated a combination of desktop datasets, aerial imagery and targeted field surveys undertaken across a 1 km wide Study Area to identify ecological values potentially impacted by the proposal.

The assessment identified several ecological features that influenced alignment refinement, including riparian vegetation associated with major waterways and waterholes, wetlands and seasonally inundated areas, large hollow-bearing trees, sinkholes, Sites of Botanical Significance (SOBS), Bullwaddy and Bullwaddy–Lancewood vegetation communities, Snappy Gum woodland patches, and habitat for threatened fauna species. The assessment concluded that these localised sensitive habitat features represent the primary ecological considerations for the Proposal, rather than any broader landscape-scale constraints.

Ecological considerations will continue to inform detailed design through micro-siting of the pipeline and above ground infrastructure within the Proposal area. This would include, where practicable:

- Selection of watercourse crossing locations that minimise disturbance to riparian vegetation and waterholes.
- Siting ancillary infrastructure, including temporary construction facilities, borrow pits, laydown areas and anode beds, within previously disturbed or lower-value habitat where practicable.
- Minimising clearing of large hollow-bearing trees and structurally complex vegetation communities.
- Avoiding direct disturbance to identified sinkholes and associated karst features.
- Maximising the use of existing access tracks to reduce disturbance to native vegetation.

Through this iterative design process, ecological investigations have supported the selection of a pipeline and above ground infrastructure that avoids or minimises impacts to sensitive ecological features identified within the Study Area, while maintaining flexibility for ongoing design refinement.

3.4 Associated projects

The subsections below provide a summary of recent and future projects adjacent to the Proposal.

3.4.1 Sturt Plateau (SPP) Pipeline

In 2025, APA constructed a new DN300 diameter (12 inch or 300mm), 37km long pipeline in the Beetaloo Sub-basin that would deliver up to 40TJ of gas per day to the existing AGP to supplement gas supply to Darwin.

On 11 March 2025, a determination was received that the SPP does not require an environmental impact assessment. A Notice of Decision and Statement of Reasons is available on the NT EPA website.

3.4.2 Development of Collection Headers

As the Beetaloo Sub-basin is developed further, it is anticipated that additional collection headers would be required to transport produced gas to compressor station #1.

Such development of collection headers is uncertain at this stage and has been excluded from the Proposal. Although they are uncertain, they have been considered as part of the cumulative impact assessment in Section 6.8.3.

4. Regulatory context

The following sections discuss:

- The policy context of the Proposal at both the NT and Commonwealth level required primary approvals licences and authorisations.
- How the Proposal has applied the principles of environment protection and management (Part 2 of the EP Act), and general duty on proponents (section 43 of the EP Act).

4.1 Strategic and statutory context

Table 14 describes how the Proposal aligns with key policies and strategies prepared by both the NT and Commonwealth Government.

Table 14. Relevant policies and plans to the project

Policy/plan	Relevance to the Proposal
Northern Territory Government's Climate Change Response: Towards 2050 (NT Government 2020)	The NT Government recognises the challenge climate change presents for the global community and the importance of a well-managed transition to a low-carbon economy. The NT Government is committed to acting on climate change to maximise the economic, social and environmental wellbeing of Territorians. In response, the NT Government has supported a goal of achieving net zero emissions by 2050 by progressively reducing net greenhouse gas emissions in the NT. The NT Government supports industries taking advantage of the abundant natural resources in the NT. APA's 2025 Climate Transition Plan provides the targets, goals, ambitions and actions in support of Australia's energy transition and our pathway to achieve net zero operational emissions by 2050.
Northern Territory Climate Resilience Plan (DEPWS 2025)	The Northern Territory Climate Resilience Plan provides the strategic framework for emissions reduction, climate adaptation and resilience. Relevantly, the Plan identifies the development of low-emissions energy infrastructure, including infrastructure supporting gas production from the Beetaloo Sub-basin, as a key component of the NT's energy transition.
Australian Government Climate Change Act 2022 (Cth)– legislating emissions reductions targets	In 2022, the Australian Government legislated Australia's greenhouse gas emissions reductions targets of a 43% reduction from 2005 levels by 2030 and net zero emissions by 2050 (section 10 of the <i>Climate Change Act 2022</i> (Cth)) The Australian Government's Future Gas Strategy (2024) recognises the role of gas in enabling the broader transition from coal fired power generation to renewables. To support overall transition to net zero by 2050, new sources of gas supply are needed to avoid shortfalls during the transition and enable coal to exit the system. This is reiterated by the AEMO's GSOO 2026 which forecasts gas shortfalls from 2029 that is likely to broaden into the 2030s with new supply being required from 2030 onwards in most scenarios. APA are focused on aligning with both the Australian Government and AEMO's position to bring new domestic gas supply online whilst focusing on reducing operational emissions. Refer to APA's Climate Transition Plan (2025) for further information.

Policy/plan	Relevance to the Proposal
First Nations Clean Energy Network: Leading Best Practice for Clean Energy Projects (Principles)	APA's strategic approach to First Nations engagement is guided by the overarching Beetaloo First Nations Engagement Strategy and APA's Reconciliation Action Plan (RAP). Refer to APA's RAP for further information. The RAP aims to promote reconciliation, strengthen relationships, and create opportunities for prosperity. These documents are guided by the principles to ensure all engagement with First Nations communities is culturally aligned and impactful.
Considerations related to the Scientific Inquiry into Hydraulic Fracturing in the Northern Territory (Pepper Inquiry)	The Pepper Inquiry was commissioned to assess where the onshore shale gas development (including hydraulic fracturing) could occur safely in the Northern Territory. It delivered its final report in March 2018 containing 135 recommendations. Whilst fracking is not required to construct and operate the Project, the transported gas would be derived from gas wells using hydraulic fracturing. The Pepper Inquiry, whilst focused on shale gas extraction, provides a number of recommendations that apply indirectly to pipeline construction and operation as they relate to land disturbance, water extraction and protection, greenhouse gas emissions, environmental management, cultural heritage, cumulative impact, monitoring and compliance. APA undertake to apply pipeline industry best practice during each phase of the pipeline lifecycle.

4.2 Approvals, licences and authorisations

The NT EPA will determine if the Proposal requires assessment under the EP Act. Other relevant primary legislation is described in Table 15.

Table 15. Relevant primary legislation

Instrument	Relevance
Commonwealth	
<i>Environment Protection and Biodiversity Conservation Act 1999 (Cth)</i>	The Project will be referred for assessment under the EPBC Act. Refer to Section 6.3.4 of this Report for further details.
<i>Native Title Act 1993 (Cth)</i>	Native Title has been determined over a large section of the Proposal area, including twelve native title determinations and active applications. APA have established regular engagement with the Northern Land Council (NLC) which represent administrative bodies of all native title determinations and registered applications. The NLC are facilitating discussions in relation to Indigenous Land Use Agreements (ILUAs).
Northern Territory	
<i>Aboriginal Land Rights Act (NT)</i>	The Proposal traverses freehold land owned by Wampaya Association Incorporated. A Section 19 permit is not required as the land was acquired under an association independent to Aboriginal Land Rights Act. The Proposal does not traverse any other Aboriginal land.
<i>Building Act 1993</i>	All buildings construction (including temporary infrastructure) in the NT must comply with the standards and codes prescribed under the <i>Building Act 1993</i> . The construction camps are not located within a declared building control area and do not require a building permit or occupancy certificate to be issued under the <i>Building Act 1993</i> .

Instrument	Relevance
<i>Control of Roads Act 1953</i>	APA would obtain any required permit to work for works within the road reserve or roads. A Traffic Management Plan would be submitted as part of the permits. Works involved in creating new access tracks, modification of an existing access tracks, discharging stormwater or installation of new infrastructure would likely require a Road Agency Approval.
<i>Energy Pipelines Act 1981</i>	APA has obtained Pipeline Permit #9 to investigate the Proposal. A Pipeline Licence and Pipeline Management Plan would be prepared and submitted to the regulator for the construction, commissioning, operation, maintenance and decommissioning of the pipeline.
<i>Environment Protection Act (NT)</i>	APA has prepared this Report and will provide sufficient information on the Proposal to enable the NT EPA to make a determination on whether an environmental impact assessment is required and, if so, the appropriate assessment pathway
<i>Food Act 2024</i>	Camp kitchens may need to be registered as a food business if food is handled or offered to an employee, either as a sale or as part of a contract. The kitchens also need to comply with the Food Safety Standards.
<i>Heritage Act 2011 (NT)</i>	Heritage assessment would be undertaken to identify any Aboriginal and/or non-Aboriginal archaeological features within the Proposal area. Approval would be required if there are any impacts to heritage. Impacts would be managed in accordance with a Cultural Heritage Management Plan (CHMP) prepared in consultation with the NT Heritage Branch and relevant Traditional Owners. Consultation with the Heritage Branch has been undertaken through the preparation of the preliminary cultural and heritage desktop assessment.
<i>Northern Territory Aboriginal Sacred Sites Act 1978</i>	APA would apply for Authority Certification over the Proposal area to ensure that Sacred Sites are identified and protected. The Proposal design has accounted for and avoided known registered and recorded sacred sites, noting there may be unregistered sites that require avoidance. An unexpected finds protocol has been developed as part of the Cultural Heritage Desktop Assessment. This would be incorporated into the CHMP for the Proposal.
<i>Pastoral Lands Act 1992</i>	The Proposal would require the following approvals: Non-pastoral Land Use Permit for non-pastoral use of pastoral land under a Perpetual Pastoral Lease. Pastoral Land Clearing Consent for clearing of native vegetation on pastoral land under a Perpetual Pastoral Lease.
<i>Planning Act 1999</i>	Where the clearing native vegetation is authorised under other legislation (i.e. EP Act or the Energy Pipeline Act), a separate clearing permit under this Act is not required for clearing on freehold land, Crown land, Aboriginal freehold land, or within an NT road reserve.
<i>Public and Environmental Health Act 2011</i>	APA would notify the Department of Health of the construction of the wastewater management system at each temporary construction camp, and the design and installation of the systems would be certified.
<i>Soils Conservation and Land Utilisation Act 1969</i>	Erosion and Sediment Control Plans would be required.

Instrument	Relevance
<i>Territory Parks and Wildlife Conservation Act 1976</i>	APA would require an <i>interfere with wildlife</i> permit to remove wildlife, including protected native plants during land clearing and construction activities.
<i>Traffic Act 1987</i>	Access to, or infrastructure within, a road reserve is typically formalised through a crossing deed or access agreement issued by the DLI. APA would obtain the required crossing deeds or access agreement, in consultation with DLI. The transportation of compressor station components would be undertaken by double trailered road trains. Based on conceptual road train configuration to transport the components, an oversize or overmass (OSOM) permit would not be required. An approved road train network assessment route is expected to be required, to assess that the road network can physically handle the vehicle. The application would be prepared in consultation with DLI. A Traffic Impact Assessment would be undertaken to provide information on logistics and sequencing of truck movements from intermediate pipe stockpiles to the pipeline corridor. A Traffic Management Plan would be prepared for construction, commissioning and operations and submitted to DLI for approval, before the commencement of construction. The Traffic Management Plan would be in accordance with the current AS1742.3, the <i>Australian Guide to Temporary Traffic Management</i>, Provisions for Traffic and designed by a Northern Territory accredited Traffic Management Plan Designer (WZ1 certification).
<i>Waste Management and Pollution Control Act (WMPC Act) 1998</i>	The Proposal is unlikely to trigger the requirement for an Environment Protection Licence, as the regulation of effluent wastewater is under the DOH wastewater management framework and project specific environmental management plans.
<i>Water Act 1992</i>	The Proposal is predominantly located within the <i>Georgina Wiso Water Allocation Plan (WAP) 2023–2031</i> (NT Government 2023) area and the Daly Roper Beetaloo Declared Water Control District, with only the southernmost section occurring outside a declared water control district. The Proposal would require multiple watercourse crossings. <i>Interfere with a waterway</i> permits under the Act would be required for undertaking works within or directly adjacent to the drainage line. APA would require the construction of new groundwater bores along the pipeline corridor for construction, commissioning and at the temporary camp sites. Bore work permits would be applied for in accordance with this Act. If any structural change to existing bores is required, APA would apply for a bore work permit in consultation with the Controller of Water Resources. The Proposal would require extraction licences to extract groundwater for use.
<i>Weeds Management Act 2001</i>	To comply with the Act APA is required to manage its activities to ensure that declared weeds and potential weeds are not introduced or spread.
<i>Work Health and Safety (National Uniform Legislation) Act 2011</i>	The Proposal requires to be constructed safely in accordance with the provisions of this Act.

The APGA *Code of Environmental Practice Onshore Pipelines 2022* would be used as the minimum acceptable standards to be applied to the pipeline construction, commissioning, operation and decommissioning phases.

4.3 Principles of environmental protection and management

The Proposal has applied the principles of environment protection and management (Part 2 of the EP Act), and section 43 general duty on proponents. Details of this are provided in Table 16.

Table 16. Responses to the EP Act section 42 and 43 requirements

Principles of Ecological Sustainable Development	
Decision-making principle	Section 18 EP Act states: 1. <i>Decision-making processes should effectively integrate both long-term and short-term environmental and equitable considerations.</i> 2. <i>Decision-making processes should provide for community involvement in relation to decisions and actions that affect the community.</i>
Principle of Proportionality	<i>Decision-making processes should ensure that decisions or actions directed at minimising harm or a risk of harm or impact to the environment are proportionate to the harm or risk of harm or impact that is being addressed.</i> The Proposal's decision-making process is based on a whole-of-life assessment that integrates environmental, social and economic factors into key decisions relating to the Proposal, including route selection, design, construction methods and ongoing operations. The Proposal has and will continue to assess the short-term impacts such as vegetation clearing, landholder disturbance, construction emissions alongside long-term considerations including biodiversity outcomes, rehabilitation success, greenhouse gas emissions and potential cumulative impacts. Decisions would be informed by avoidance and mitigation measures that prioritise environmentally sensitive areas, supported by ongoing input from affected communities, even where this may increase upfront costs. Engagement with stakeholders, including Traditional Owners, pastoralists and local communities, would be embedded throughout the Project lifecycle to ensure that local knowledge, land use priorities and environmental and heritage values are incorporated into Proposal design and implementation. This would include negotiated land access arrangements, protection of cultural heritage values, and opportunities for community input to environmental management. The Proposal would adopt an adaptive management approach, informed by continuous engagement and feedback, to respond effectively to community concerns and environmental outcomes over time.

Principles of Ecological Sustainable Development	
Precautionary principle	Section 19 EP Act states: 1. <i>If there are threats of serious or irreversible environmental damage, lack of full scientific certainty should not be used as a reason for postponing measures to prevent environmental degradation.</i> 2. <i>Decision-making should be guided by:</i> a. <i>a careful evaluation to avoid serious or irreversible damage to the environment wherever practicable; and</i> b. <i>an assessment of the risk-weighted consequences of various options.</i> The Proposal would apply a careful evaluation of alternatives to <i>avoid serious or irreversible environmental damage wherever practicable</i>, including route selection to bypass high-value environmental or culturally significant areas, and implementation of best-practice construction and operational controls. Decision-making would also be guided by <i>an assessment of the risk-weighted consequences of various options</i>, comparing environmental risks, likelihoods and potential impacts to inform the most appropriate course of action. The Proposal construction and operational aspects and impacts have been assessed to inform decision-making and minimise the effects of the Proposal activities, the findings of which are summarised in this Report. Activities have been evaluated in terms of their extent, severity and duration. Where there was uncertainty in any aspects of the impact assessment process, precautionary principle was adopted and a more conservative aspect applied. Community involvement is integral to the application of the precautionary principle, ensuring that local knowledge and concerns inform risk identification and management. Where uncertainty exists, stakeholder input helps shape precautionary measures, including additional buffers, monitoring, or modifications to construction methods. Ongoing consultation and transparent communication of risks, assumptions and management responses would support informed decision-making and build confidence that potential impacts are being proactively addressed. The precautionary principle will continue to be an integral component a robust environmental and cultural risk assessment for future stages of the Proposal.
Principle of evidence-based decision-making	Section 20 EP Act states: 1. <i>Decisions should be based on the best available evidence in the circumstances that is relevant and reliable.</i> Construction and operational aspects and impacts have been comprehensively assessed, and the existing environment is well understood. These assessments drew on the best available, relevant, and reliable information to support sound and transparent outcomes. The same evidence-based decision-making principles would be used to further refine the pipeline corridor and avoid or and minimise potential impacts associated with the Proposal.

Principles of Ecological Sustainable Development	
Principle of intergenerational and intergenerational equity	Section 21 EP Act states: <i>The present generation should ensure that the health, diversity and productivity of the environment is maintained or enhanced for the benefit of present and future generations.</i> APA will implement a structured, transparent and long-term approach to environmental management that is informed by ongoing community input. Decision-making for the Proposal considers the potential for both immediate and lasting impacts and would prioritise avoidance and minimisation wherever practicable. Significant residual impacts that cannot be avoided would be offset in accordance with statutory consent conditions to ensure no net loss of value to future generations.
Principle of sustainable use	Section 22 EP Act states: <i>Natural resources should be used in a manner that is sustainable, prudent, rational, wise and appropriate.</i> The principle of sustainable use will be used across all stages of the Project and the Proposal. The Proposal would minimise the use of land, water and other natural resources by optimising pipeline design, construction methods and operational efficiency, including the careful selection of the pipeline corridor to reduce clearing, avoid sensitive areas and limit fragmentation of habitats. Construction practices would be designed to minimise disturbance, manage soil and water resources appropriately, and prevent degradation through erosion and contamination controls. Operational measures would focus on efficiency and reliability, including leak detection and maintenance programs, to ensure responsible and prudent use of resources over time. Rehabilitation commitments would aim to restore land capability and ecological function as far as practicable, ensuring that the productivity and environmental values of the landscape are maintained in the long term.
Principle of conservation of biological diversity and ecological integrity	Section 23 EP Act states: <i>Biological diversity and ecological integrity should be conserved and maintained.</i> The Proposal will be designed and implemented to avoid and minimise impacts to ecosystems, species and habitats by prioritising pipeline route selection that avoids areas of high biodiversity value, including threatened species habitat, riparian zones and intact vegetation communities. Where impacts cannot be avoided, APA would implement targeted mitigation measures, such as minimising clearing widths, controlling invasive species, and managing construction activities to reduce disturbance to flora and fauna. Progressive reinstatement would aim to restore native vegetation and ecological function to ensure that biodiversity values and ecosystem processes are maintained over time (refer to Section 6.3 for further information). Threatened flora and fauna species and native vegetation within and surrounding the Proposal area would be subject to micro-rerouting of the pipeline to avoid or otherwise minimise impacts as far as reasonably possible. Impacts on fauna movement and foraging within the CRoW would be temporary, occurring only during the construction phase, and would affect a very small proportion of each species' overall range.

Principles of Ecological Sustainable Development	
Principle of improved valuation, pricing and incentive mechanisms	Section 26 EP Act states: <i>1. Environmental factors should be included in the valuation of assets and services;</i> <i>2. Persons who generate pollution and waste should bear the cost of containment, avoidance and abatement;</i> <i>3. Users of goods and services should pay prices based on the full life cycle costs of providing the goods and services, including costs relating to the use of natural resources and the ultimate disposal of wastes;</i> <i>4. Established environmental goals should be pursued in the most cost-effective way by establishing incentive structures, including market mechanisms, which enable persons best placed to maximise benefits or minimise costs to develop solutions and responses to environmental problems.</i> Environmental factors, cultural heritage and Native Title impacts have been included in the valuation of the Proposal. Biodiversity and GHG emissions are considered in the evaluation of pipeline location, construction methods, design and operational practices. The Proposal would incorporate the use of biodiversity offsets where significant residual impacts to threatened ecological values cannot be avoided, ensuring that environmental assets are appropriately valued and that no net loss, or a net gain where practicable, is achieved. Similarly, if required, carbon offsets would be considered to address GHG emissions associated with construction and operation, ensuring that climate-related impacts are factored into the overall valuation of the Project. Although avoidance is a priority, APA acknowledges there may be residual potential impacts to Aboriginal cultural heritage and Native title rights and will work with Traditional Owners to understand the nature and significance of the impacts and how best to manage and or compensate for the impacts. These measures ensure that APA retains responsibility for environmental, cultural heritage and Native Title costs, rather than transferring them to the community or future generations. APA has and will continue to refine costing into decisions, including construction, operation, decommissioning and final rehabilitation. This would include provision for long-term environmental management obligations, such as monitoring programs, site reinstatement and if necessary rehabilitation, and the implementation and maintenance of biodiversity and carbon offsets. APA would apply efficient and adaptive approaches to achieving environmental outcomes. This includes leveraging market-based mechanisms such as carbon offset schemes and biodiversity offset frameworks to deliver measurable environmental benefits in a cost-effective manner. Through this approach, the project would align economic decision-making with environmental outcomes, promoting accountability, innovation and long-term sustainability.

Principles of Ecological Sustainable Development	
Environmental decision-making hierarchy	Section 26 EP Act states: <i>In making decisions in relation to actions that affect the environment, decision-makers, proponents and approval holders must apply the following hierarchy of approaches in order of priority:</i> <i>Ensure that actions are designed to avoid adverse impacts on the environment;</i> <i>Identify management options to mitigate adverse impacts on the environment to the greatest extent practicable;</i> <i>If appropriate, provide for environmental offsets in accordance with this Act for residual adverse impacts on the environment that cannot be avoided or mitigated.</i> <i>In making decisions in relation to actions that affect the environment, decision-makers, proponents and approval holders must ensure that the potential for actions to enhance or restore environmental quality is identified and provided for to the extent practicable.</i> Through extensive environmental studies (desktop and field surveys), the Proposal area has prioritised the avoidance of adverse impacts on the environment, cultural heritage and communities wherever practicable, including through careful route selection. Early engagement with stakeholders has played a key role in identifying these areas, ensuring that local knowledge informs avoidance decisions and that potential impacts are addressed at the earliest stage of project planning. Where impacts cannot be avoided, APA has and will continue to identify and implement management options to mitigate adverse impacts. This would include the application of good industry-practice construction and operational controls such as minimising vegetation clearing, managing erosion and sediment, protecting water quality, and implementing fauna management measures. In circumstances where significant residual adverse impacts remain after avoidance and mitigation, APA will, if required, provide for environmental offsets in accordance with relevant legislative and policy requirements. This may include the implementation of biodiversity offsets to compensate for residual impacts on ecological values and carbon offsets to address GHG emissions associated with the Proposal. The selection and design of offset measures will be informed by stakeholder engagement to ensure they are locally relevant, transparent and aligned with broader environmental objectives. APA would also incorporate opportunities to improve environmental outcomes. This would include commitments to progressive land rehabilitation, restoration of native vegetation and ecosystem function, and participation in offset or conservation programs that deliver measurable environmental benefits. Community involvement would support the identification of enhancement opportunities, particularly through collaboration with Traditional Owners and local stakeholders for offsets and long-term land management. Through this approach, the Proposal would not only minimise adverse impacts but also contribute to the maintenance and improvement of environmental values over time, consistent with the NT EPA's hierarchy.
Waste management hierarchy	Section 26 EP Act states: <i>In designing, implementing and managing an action, all reasonable and practicable measures should be taken to minimise the generation of waste and its discharge into the environment.</i> <i>For subsection (1), waste should be managed in accordance with the following hierarchy of approaches in order of priority:</i>

Principles of Ecological Sustainable Development

- a. Avoidance of the production of waste;*
- b. Minimisation of the production of waste;*
- c. Re-use of waste;*
- d. Recycling of waste;*
- e. Recovery of energy and other resources from waste;*
- f. Treatment of waste to reduce potentially adverse impacts;*
- g. Disposal of waste in an environmentally sound manner.*

Waste management considerations would be embedded early in the Proposal planning and design, including the selection of construction methods, materials and logistics that reduce waste generation.

Consistent with the requirement that waste be managed in accordance with the hierarchy of approaches, APA would prioritise the avoidance of the construction and production of waste wherever practicable, including through efficient design, accurate material estimation and procurement practices that reduce surplus. Where avoidance is not feasible, the project would focus on the minimisation of waste generation, for example by optimising construction processes and reducing packaging and material offcuts. Opportunities for the re-use of waste would be implemented where safe and practical, such as reusing cleared vegetation for rehabilitation or erosion control. If feasible, the Proposal would also maximise the recycling of waste, including segregation of recyclable materials such as metals and plastics for appropriate processing.

Due to the remote nature of Proposal activities, opportunities for the recovery of energy and other resources from waste, are considered low. Waste that cannot be avoided, minimised, reused, recycled or recovered such as hazardous materials would be treated to reduce potentially adverse impacts in accordance with regulatory requirements.

All waste would be disposed in an environmentally sound manner, using licensed facilities and ensuring that disposal practices do not adversely affect environmental values.

The key wastes expected to be generated by the Proposal are:

- hydrotest wastewater
- general waste, recycled waste and treated effluent from construction and operation of the temporary construction camps

Hydrotest water would be reused for multiple hydrotest rounds, thereby reducing the volume of groundwater required for extraction. The installation of turkey nests would facilitate and ensure water quality is maintained prior to reuse.

APA is evaluating the procurement of materials and construction camp infrastructure that can be demobilised, transported, and remobilised between locations as the pipeline progresses.

Other measures of beneficial reuse would be considered and adopted if feasible as project planning progresses. One such example currently being examined is the possibility of using biodegradable polymer as a membrane instead of PVC liner for turkey nest dams.

A waste management plan will be developed for construction and operations in accordance with standard industry-practice principles for waste management and procurement of materials.

Other section 43 considerations	
Have communities that may be affected by the proposed action been provided with information and opportunities for consultation?	APA has engaged True North Strategic Advisory to undertake preliminary social impact scoping, develop an engagement approach for the development consenting and complete targeted stakeholder engagement. Initial consultation has been undertaken with key stakeholders to introduce the Proposal, identify potential issues and inform early planning. These findings have contributed to the identification of some potential social impacts as listed in Section 6.6: Community and Economy. APA continues to consult relevant stakeholders and incorporate relevant issues into decision-making, with a focus on enhancing positive outcomes and minimising adverse impacts. While these early activities represent an important preliminary step, APA acknowledges that consultation to date has been targeted rather than comprehensive. In parallel, APA is advancing strategies to prioritise Local Content and First Nations Participation for the Project. This will establish a framework for local workforce involvement during construction and operation and will form an important component of ongoing engagement with relevant stakeholders.
Has consultation with affected communities, including Aboriginal communities' been undertaken in a culturally appropriate manner?	APA has been consulting with key Aboriginal representative bodies, including the NLC and AAPA, as well as Traditional Owners and Custodians representing the Native Title holders. Engagement would continue with these organisations and relevant community stakeholders (such as local Aboriginal owned and operated businesses) throughout the approvals process. APA would conduct engagement in a culturally appropriate manner, consistent with the principles of free, prior and informed consent. This includes working through recognised representative structures and progressing ILUAs with Native Title holders within the Proposal area. Preliminary face to face community engagement has been undertaken in Elliott and Daly Waters. These sessions were publicly advertised locally and designed to be accessible including the use of large format maps, visual materials and information sessions supported by BBQs. As part of early targeted engagement, APA has also briefed the Alpururulam and Elliott Local Authorities, providing an opportunity for representatives to receive information about the project and raise questions or concerns.
Has community knowledge and understanding (including scientific and traditional knowledge and understanding) of the natural and cultural values of areas that may be impacted by the proposed action been sought and documented?	APA has drawn on technical expertise and early engagement with relevant stakeholders to inform an understanding of the natural, social and cultural values of the area. APA has engaged with government departments and specialist consulting firms to provide advice on local environment setting and to assess how the proposal may interact with any identified values. Due diligence has been undertaken to identify registered sacred sites in proximity to the Proposal area. These identified sites have informed Proposal design, with avoidance measures applied where known. Archaeological and cultural heritage surveys would be undertaken in partnership with Traditional Owners and appropriate representative bodies including through the AAPA Authority Certificate and ILUA processes

Other section 43 considerations

Have Aboriginal values and the rights and interests of Aboriginal communities' been addressed in relation to areas that may be impacted by the proposed action?

APA have commenced consultation with the NLC and AAPA and are progressing works and agreements required under the *Heritage Act 2011*, *Northern Territory Aboriginal Sacred Sites Act 1989*, the EP Act and the *Native Title Act 1993*.

These processes will enable Aboriginal values relevant to the Proposal to be identified and negotiations to be documented regarding access and use of the Proposal area.

5. Consultation

The EP Act 2019 requires proponents to engage with stakeholders who may be affected by a proposal, and to help communities and the public understand the potential impacts and benefits of a proposed action. The NT EPA's *Stakeholder Engagement and Consultation Guidance for Proponents* (2021) highlights that stakeholder consultation is an important component of social, cultural and health impact assessments, in addition to formal opportunities for feedback on documents placed on public exhibition.

A Stakeholder Engagement Plan (SEP) (see Appendix B) has been developed to guide engagement activities.

APA would also develop and implement Proposal specific communication and engagement strategies for the construction, operations and decommissioning of the NEA Pipeline.

5.1 Engagement approach

The engagement approach ensures that both environmental and social considerations are meaningfully addressed through engagement and that people and communities are fully informed about the Project as a whole and can provide feedback and influence decisions that impact them.

A phased approach to engagement has been designed to guide early and targeted engagement to inform the Referral, as well as any ongoing engagement.

5.1.1 Engagement aims and objectives

The engagement aims and objectives, as identified in the SEP (see Appendix B), are guided by best practice and designed to ensure transparent, inclusive and culturally appropriate consultation throughout the regulatory consenting process. APA acknowledges the ongoing EPBC Act reforms and the proposed National Environmental Standard for Community Engagement and will consider relevant requirements and guidance as they are finalised to ensure community and stakeholder engagement remains consistent with contemporary regulatory expectations.

APA's primary purpose for engagement is to ensure governments, affected individuals and communities are informed about the project at all stages, understand its potential impacts, and have opportunities to ask questions, clarify information and contribute to decision-making during the planning process. A key outcome of consultation is for APA to understand how stakeholders interact with the Proposal area and the connections to Country and cultural practices.

As such, the objectives for engagement in accordance with the EP Act and best practice engagement are to:

- Provide timely, accurate, relevant and culturally appropriate information about the Proposal and the overall Project.
- Understand stakeholder and community perceptions, ideas and concerns about the Proposal and the overall Project.
- Understand stakeholder and community values about the Proposal area and the and the overall Project. itself.
- Seek feedback from stakeholders and listen to and understand stakeholder priorities, values and perspectives.
- Facilitate project engagement requirements to inform and progress key Project deliverables.

APA will engage with First Nations and Traditional Owner stakeholders in line with the principles set out in the RAP. This approach reflects leading-practice principles for respectful engagement, protection of cultural heritage, and the delivery of meaningful economic and social outcomes.

APA would engage with First Nations communities, ensuring transparency, accountability, and the genuine integration of feedback into project planning and delivery. APA recognises the importance of protecting cultural heritage and respecting Country.

Culturally appropriate consultation with First Nations communities is a core requirement, and engagement will aim to:

- Build respectful, long-term relationships with Traditional Owners and Native Title holders,
- Ensure communities are informed early and kept updated throughout the Proposal development,
- Identify and respond to concerns about cultural heritage, land access, and environmental management,
- Provide opportunities for economic and social participation, including employment, training, and contracting,
- Support land stewardship initiatives and sustainable use of Country.

5.2 Stakeholder mapping

The SEP has identified an initial list of stakeholders relevant to this Proposal, along with the appropriate level of engagement and the recommended engagement tactics as summarised in Table 17.

Using the International Association for Public Participation (IAP2) principles that guide good community engagement, at this early stage of the Proposal, engagement will be conducted at the levels of inform, consult, and involve.

Table 17. Summary of identified stakeholders and engagement level approach proposed

Stakeholder group	Stakeholders	Engage level approach	Communication methods
Commonwealth Government	• Office of the Prime Minister • Treasurer • Minister for Climate Change and Energy • Minister for Resources and Northern Australia • Minister for Industry and Science • Department of Climate Change, Energy, the Environment and Water • Department of Industry, Science and Resources • Department of Infrastructure, Transport, Regional Development, Communications, Sport and the Arts • Treasury • PM&C National Indigenous Australian's Agency (NIAA) • Senator for the NT, the Hon. Malarndirri McCarthy • Member for Solomon, Mr Luke Gosling • Member for Lingiari, Ms Marion Scrymgour	Inform, consult and involve	• Meetings with priority stakeholders • Regular project updates • Meetings in support of planning consent, licencing and permitting.

Stakeholder group	Stakeholders	Engage level approach	Communication methods
Northern Territory Government	- Office of the Chief Minister - Deputy Chief Minister and Minister for Mining and Energy - Treasurer - Department of Mining and Energy - Department of Infrastructure, Planning and Logistics - Department of Agriculture and Fisheries - Northern Territory EPA - Aboriginal Areas Protection Authority - Pastoral Land Board	Inform, consult and involve	- Meetings with priority stakeholders - Regular project updates - Meetings in support of planning consent, licencing and permitting. - Website
Queensland government (Stage 2)	- Office of the Coordinator General (OCG) - Referral agencies	Inform, consult and involve	- Monthly meetings (OCG). - Meetings, briefings and provide regular updates. Both in-person engagement and online via Teams.
NT Local government	- Barkly Regional Council - Roper Gulf Regional Council	Inform, consult and involve	Meetings, briefings and provide regular updates. Both in-person engagement and online via Teams.
Local Communities	- Elliott, Alpururulam, Mataranka, Daly Waters and other communities as identified - Local community groups and community leaders - Local Authority Meetings	Inform and consult	Community information sessions
Industry Associations and Peak Bodies	- Northern Territory Chamber of Commerce and Industry (NTCCI) - Northern Territory Cattlemen's Association (NTCA) - NT Road Transport Association (NTRTA) - Northern Territory Indigenous Business Network (NTRTA) - Other regional economic and industry groups	Inform and consult	Meetings, briefings and provide regular updates. Both in-person engagement and online via Teams.
Environmental and Community Interest Groups	- Environment Centre NT - Community advocacy groups - Regional environmental organisations	Inform	Provide Project overview

Stakeholder group	Stakeholders	Engage level approach	Communication methods
Emergency Services and Community Safety Agencies	- Police, fire and emergency services agencies - Regional disaster management stakeholders	Inform	Provide Project overview and email Project information factsheets
Pastoralist and Landholders	- Pastoral lease holders - Adjacent landholders - Property managers and occupiers along the corridor	Inform, involve and consult	Address regulatory processes, provide regular project updates and project information material
First Nations Peoples and Representative Organisations	- Indjalandji-Dhidhanu Aboriginal Corporation RNTBC - NLC - Top End Aboriginal Corporation RNTBC	Inform, involve and consult	- Regulatory process - Meetings, briefings and provide regular updates. Both in-person engagement and online via Teams. - Monthly meetings (NLC)

5.3 Stakeholder engagement

Consultation has, and will continue to, be undertaken in accordance with section 43 EP Act general duty of proponents.

This section outlines the methods and approaches used to engage and consult with stakeholders in relation to the Proposal prior to the submission of this Report. It describes the early and targeted consultation strategies implemented to inform stakeholders about the Proposal and to inform the scoping of potential social impacts.

5.3.1 Early engagement

Early engagement commenced in 2025, with a focus on government stakeholders, regulatory agencies, First Nations organisations and landholders. The purpose of early engagement with these stakeholders was to introduce the Project, listen to any early high-level feedback as part of the planning process and to introduce the project team.

APA has also established a dedicated webpage, Project email address and phone number, and a feedback contact form.

5.3.1.1 Local Government Areas

APA has completed initial engagement with both Local Government Areas (LGA) Regional Councils, as listed in Section 5.2, that the Proposal area covers. The briefing included an overview of the Project and an introduction to the APA team. The purpose of this communication was to establish transparency and foster open communication with APA, ensuring that the LGAs are aware of the Project's direction and have a clear channel and access to APA representatives for feedback.

5.3.1.2 Landholders (Pastoralists)

As part of the Pipeline Permit Approval under the *Energy Pipelines Act 1981*, APA were required to notify all landholders and establish access agreements, prior to commencement of on-ground surveys and planning activities. This notification was undertaken and ground surveys completed.

5.3.2 Targeted engagement

In April and May 2026, APA undertook targeted engagement with key stakeholders to inform them about the Project and to conduct interviews to understand potential impacts ahead of this Referral submission. Activities included a combination of face-to-face meetings, phone calls and online discussions as well as community

information sessions and BBQs. These sessions were supported by accessible materials such as fact sheets, maps, flip books and PowerPoint presentations. A Consultation summary (refer to Appendix C) has been developed and includes key findings from the engagement. Engagement findings are detailed in Section 6.6 Community and Economy.

5.3.3 Ongoing engagement

APA would continue to engage with stakeholders regarding the Project through respectful and meaningful engagement, ensuring key stakeholders and the local community are brought along on the journey of the Proposal's development.

5.4 Addressing stakeholder concerns

APA would address stakeholder concerns through a structured approach, consistent with best practice engagement principles. This approach includes:

- Early identification of stakeholder concerns and feedback and ongoing Proposal and Project engagement,
- Assessing and considering issues in the Proposal planning with a focus on avoiding or minimising impacts where practicable,
- Responding and communicating clearly and in a timely manner,
- Integrating and refining the Proposal design, where appropriate to reflect stakeholder feedback.