



# AUSTRALIAN FLOODPLAIN ASSOCIATION

*Healthy Rivers - Healthy Communities*

**Sarah Moles,  
Secretary AFA,  
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Lodged via: <https://www.planningportal.nsw.gov.au/major-projects/project/30026>

7<sup>th</sup> December 2022

Dear sir/madam,

Please find herewith the Australian Floodplain Association's objection to the Dungowan Dam and Pipeline Project SSI - 10046.

The project completely fails to meet NSW Treasury's cost benefit ratio guidelines. Providing an average of 7,000ML/annum at a staggering cost of some \$70,000/ML this project is an extremely expensive political promise that will do nothing to secure Tamworth's future water needs.

It is reprehensible that no assessment has been made of more effective, cost efficient and long term alternative solutions that will not cause further environmental harm.

It is the AFA's view that the EIS fails to comply with statutory Planning requirements.

The AFA has particular concerns regarding impacts on the Barwon-Darling-Baaka:

- The proposed dam will reduce flows in the Peel River resulting in a failure to meet the environmental watering requirements of the Murray-Darling Basin Plan.
- There will also be an impact on the ecological health of the Namoi River catchment. The AFA understands some 190 km of high quality native fish habitat will be lost, along with migration opportunities for Federally listed threatened species including Murray Cod, Silver Perch and Eel-tailed Catfish.
- The dam will also erode connectivity between the Namoi and Barwon-Darling-Baaka.

The AFA also notes the lack of attention afforded to impacts on indigenous cultural heritage and the absence of an allocation for cultural flows.

The entire project should be rejected.

The Australian Floodplain Association (AFA) is a non-government organisation, established in 2006. It represents floodplain and wetland landowners and their communities who depend on healthy rivers, floodplains and wetlands. Its membership resides predominantly within the Northern Murray-Darling Basin and includes floodplain graziers, community groups and shire councils.

There is nothing confidential in this submission. The AFA consents to any part of it being made public.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'S. Moles', with a horizontal line underneath.

Sarah Moles,  
Secretary.