

NSW Department of Planning and Environment

5 December 2022

Lodged At: <https://www.planningportal.nsw.gov.au/major-projects/project/30026>

Submission of Objection

Dungowan Dam and Pipeline Project SSI - 10046

The Nature Conservation Council of NSW (NCC) is the state's peak environment organisation. We represent over 170 environment groups across NSW. Together we are dedicated to protecting and conserving the wildlife, landscapes and natural resources of NSW.

We welcome the opportunity to comment on the Dungowan Dam and Pipeline Project SSI-10046.

Nature Conservation Council objects to the proposed new Dungowan Dam because:

- it is within the Northern Basin of the Murray-Darling catchment and will erode attempts to bring the Namoi water sources under a Sustainable Diversion Limit
- The Namoi is highly connected to the Barwon-Darling and must be managed to decrease water extraction
- The Northern Basin lost 70 GL of water recovery during the final negotiated outcomes of the Basin Plan
- It is not in the interest of improved water management to build more instream water storages in the Namoi catchment
- The Environmental Impact Statement (EIS) assessing the impacts of the Dungowan Dam proposal appears to be biased and flawed.

This submission will focus on the failure of the EIS to comply with the Secretary of Planning Environmental Assessment Requirements (SEARs).

Alternatives and Options

The EIS fails to adequately comply with the following requirement:

To include:

(e) a description of how alternatives to and options within the project were analysed and optimised to inform the selection of the preferred alternative / option. The description must contain sufficient detail to enable an understanding of why the preferred alternative was selected over other options(s) considered for achieving the project strategic objective.¹

The EIS fails to provide new information on the assessment of alternative options to a larger dam to improve Tamworth water security. The focus of the assessment is on the construction of a 22.5 GL water storage on Dungowan Creek based on out-of-date analysis and political announcements.

The Business Case developed for the Dungowan Dam project admits that it is not a long-term solution, despite its expense.

Threatened Species

The EIS fails to adequately comply with the following requirement:

The assessment must have regard to applicable NSW and Commonwealth Government policies and guidelines. In particular, the EIS must address the following:

Terrestrial Biodiversity and Ecology – including:

7. Assessment of terrestrial, riparian and floodplain biodiversity and ecology that addresses all direct, indirect, and prescribed impacts of the project on flora and fauna, threatened species, populations, and communities for the construction and operation of the asset, including flow dependent and groundwater dependent ecosystems.²

The EIS fails to assess all threatened species that are known to, likely to or are possibly found in the area of impact. There are 18 threatened species that fall into one of these categories that have not been assessed in the Biodiversity Development Assessment Report (Appendix H).

¹ Planning Secretary's Environmental Assessment Requirements, SSI-10046, 27/7/2020

² Ibid

The following threatened species were not assessed:

Known to be found in the area of impact: Greater Glider, Powerful Owl, Masked Owl, Sooty Owl, Glossy-Black Cockatoo, Greater Broad-nosed Bat, Yellow-bellied Sheath-tail Bat.

Likely to be found in the area of impact: Turquoise Parrot, Barking Owl, Brown Treecreeper (eastern subspecies), Black-chinned Honeyeater (eastern subspecies), Flame Robin.

Possibly to be found in the area of impact: Brush-tailed Rock Wallaby, Square-tailed Kite, Hooded Robin, Yellow-bellied Glider, Blue-billed Duck, Bluegrass, Dungowan Starbush, *Euphrasia arguta*.

Of these species not assessed in the EIS, six are listed as Matters of National Environmental Significance under the Federal Environment Protection and Biodiversity Conservation Act 1919.

These nationally listed threatened species include: Greater Glider (Endangered), Brush-tailed Rock Wallaby (Vulnerable), Yellow-bellied Glider (Vulnerable), Bluegrass (Vulnerable), Dungowan Starbush (Critically Endangered), *Euphrasia arguta* (Critically Endangered).

Modelling

The EIS fails to adequately comply with the following requirement:

(g) an assessment of the likely impacts of the project on the biophysical and socio-economic environment, focusing on the specific issues identified below and any other significant issues identified, including:

v. any assumptions used in the modelling for the assessment of likely impacts.³

The EIS fails to identify and discuss many of the assumptions used in the water modelling to arrive at the level of impact used in the assessment process. Some of the missing assumptions or information includes:

- How the proposed 30 GL urban reserve was arrived at
- How the proposed 200 ML environmental water allowance in the proposed new Dungowan Dam was arrived at
- How transmission losses or 'run of river' losses are considered in modelling
- How groundwater recharge is considered in modelling
- The level of extraction from surface water and groundwater in Dungowan Creek

³ Ibid



Nature Conservation Council

The voice for nature in NSW

NCC considers that the EIS is an inadequate assessment of the many significant environmental impacts of a very expensive project proposed to be funded entirely by NSW and Australian taxpayers.

A larger Dungowan Dam is not the most cost effective or efficient solution to long-term water security for the city of Tamworth and for that reason should not be approved.

Thank you for the opportunity to participate in the consultation.

Your key contact point for further questions and correspondence is Mel Gray, Water Campaigner, available via mgray@nature.org.au and (02) 95160461. We welcome further conversation on this matter.

Yours sincerely,

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