



Healthy Rivers Dubbo

PO Box 216

Dubbo NSW 2830

heathyriversdubbo@gmail.com

ABN 11 988 241 202

NSW Department of Planning

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

Submission

Objection to Dungowan Dam & Pipeline Project SS-10046

Healthy Rivers Dubbo (HRD) is a grass roots community network dedicated to providing a strong voice for our local rivers, aquifers and wetlands in the Murray-Darling Basin for the benefit of wildlife, plants and people. We pay our respects to Elders past and present and acknowledge that this land was never ceded.

We are pleased to have the opportunity to provide comment on the Dungowan dam and pipeline Environmental Impact Statement (EIS).

HRD objects to the approval of the Dungowan dam (the project) on the grounds that:

- the EIS does not meet the requirements of the Secretary of Planning Assessment Requirements (SEARs)
- the project would not meet its objective to provide cost effective or efficient water supply for Tamworth
- the project would cause significant harm to the health of the rivers of the Murray-Darling Basin, undermine the Murray-Darling Basin Plan and cause harm to surviving biodiversity
- the project would harm Aboriginal cultural heritage
- the project does not represent value for tax-payer money

EIS failures

The EIS fails to address the following requirements as prescribed in the SEARs for the project:

- Analyse and optimise alternatives to the project
- Assess all threatened species that would be impacted by this project, including species listed as threatened and endangered under the Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)
- Provide all assumptions used in the modelling

Tamworth Water Security

The project would not represent a cost effective, efficient and secure water supply solution for Tamworth.

About 50% of Tamworth's drinking water being used by three large abattoirs. The EIS fails to recognise this significant industrial water use. Tamworth Regional Council has proposed an industrial

water recycling project, which would free up this 50% for domestic use. However there has been no assessment of the economic benefits of the industrial water recycling project.

Environmental Impacts

The Dungowan dam would reduce critical natural flows in the Namoi catchment, reducing migration opportunities for threatened and endangered Murray-Cod, Silver Perch and Eel-tailed Catfish. Degradation of almost 200 square kilometres of quality remaining habitat for native fish species would constitute a breach of the Government's responsibilities under the Fisheries Management Act 1994, as Dungowan Creek is within the threatened Lowland Darling River aquatic ecological community. Offsets for loss of critical native fish habitat are not adequate.

Fewer flows in the Peel River would make meeting the Environmental Water Requirements established under the Murray-Darling Basin impossible.

Water recovery in the Namoi catchment is still 9.5 GL (one Gigalitre = 1 billion litres) under the target required to meet the Sustainable Diversion Limit, the deadline for which was July 2019. This project would make it impossible to meet the SDL, as required under the federal Water Act 2007.

Platypus populations would be further genetically separated, and significant areas of critically endangered ecosystem and Koala habitat would be cleared. The EIS fails to assess 18 threatened species in the area of the project, including the recently listed Greater Glider.

Cultural Impacts

There are no allocated cultural water flows in Dungowan Creek or the Peel River. No further reduction in natural flows should be allowed until cultural flows are allocated.

The project would impact many areas of high cultural significance.

Cost Benefit

The cost benefit ratio for this project is less than the ratio of above 1 that is required by the NSW Treasury.

Even before the expected cost of the dam blew out from \$484 million to \$1.3 billion, the Productivity Commission used the Dungowan dam project as case study to highlight 'Flawed decision making'.¹

The Commission found that decisions "reflect a suite of weaknesses in decision making by governments" in the following ways:

- Project selection processes do not always identify a clear issue, or consider the full suite of options (including non-infrastructure) to address that issue
- Business cases are not long-term or comprehensive, and assumptions are not always rigorous or transparent
- Decision-making processes lack transparency.

¹ <https://www.pc.gov.au/inquiries/completed/water-reform-2020/draft/water-reform-2020-draft.docx> page 171

Conclusion

Blocking natural streams with dams to secure town water supply is now globally recognised as out-dated, ineffective technology that belongs in centuries past. The immense environmental impact caused by dams all over the world is being addressed, as Europe and the United States accelerate dam removal projects.

As climate change continues to take hold, communities must have the opportunity to develop unique, innovative non-rainfall dependent water security solutions.

Healthy Rivers Dubbo does not support the use of tax-payers money on an environmentally destructive project that is not the answer to Tamworth's water security needs.

For more information about this submission, contact the Healthy Rivers Dubbo Committee

healthyriversdubbo@gmail.com

www.healthyriversdubbo.com

December 5, 2022