

SUBMISSION OBJECTION TO THE DUNGOWAN DAM AND PIPELINE PROJECT SS1-10046

I am a citizen and ratepayer of Tamworth Regional Council and I object to the Dungowan Dam and Pipeline Project SS1-10046 because it will not contribute to the Tamworth's water security nor will it provide water resilience to Tamworth in an economically sustainable manner . It is not environmentally sustainable and does not take Climate Change into consideration effectively.

ANALYSIS AND OPTIMISATION OF ALTERNATIVES

The EIS does not give “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 option(s) considered for achieving the project strategic objective” as required by the SEARs.

The EIS uses some of the choices for water security which were listed in the 2015 Hunter H2O Report which was written before the last 2017-2019 drought . The EIS did not consider the climate independent sources of water even though the Hunter H2O Report did state that 'Recycled effluent would provide a reliable, rainfall independent source of water to Tamworth that would diversify the city's supply sources and provide more robust TWS security' that could be considered again in the future.

In fact the EIS did not consider any climate independent sources of water which is unforgivable given that we are living in a climate where Australia's average temperature has risen by 1.47 degrees since 1910 when records began.

The EIS does not consider industrial water recycling . Tamworth 's three abattoirs use 48% of Tamworth's drinking water supply. When the Baiada chicken processing plant is at full-scale it will require a further 25% increase in water use per day. Tamworth Regional Council (TRC) and CSIRO have undertaken research into industrial waste water recycling and TRC is ready now to proceed with industrial water recycling as soon as government funding is available. The amount required is 100 million dollars and TRC will have the industrial water recycling plant operational within 2 to 3 years. This project is ready to go now but for funding of \$100M. This industrial waste water recycling project will ensure that there is more drinking water available for the Tamworth residents in a cost effective , climate-proof manner. That this project was not considered in the EIS is a grave error.

There are many other viable options which were not considered. Changes to the built environment where rain water storage is mandated for all new and renovated housing , commercial, institutional and industrial buildings. Rain water storage can be built underneath buildings. There is a plethora of other measures to reduce the use of the town water supply including replacing air conditioners in summer by ceiling fans , vegetation or blinds to provide shade to buildings, white roofing material to reflect heat, composting toilets, dual flush toilets, building orientation to suit the climate . There is a simple need to design buildings and interiors for the climate.

Devices such as hydropanels were not discussed. These have been used to provide drinking water for some school during the last drought. Devices like these should have been analysed for suitability for

use on farms, for institutions such as schools, aged care and other areas, as an additional measure of ensuring water resilience when required.

TRC has an excellent program to incentivise residents to use water saving devices . These types of measures should have been analysed to see how much water has been saved.

The EIS does not recognise the value of education in water use. The population of Tamworth has increased but water consumption has not. Some of the money saved by discarding the project could be used on a state-wide education program on water-wise practices and the use of all types of recycled water.

There are also many aspects involving the environment which can reduce water use. Water wise gardens, planting suitable shade trees in parks, along streets, along walkways in back yards . None of these concepts were described in the EIS.

NO NEW WATER.

This project will not produce new water because of the Sustainable Diversion Limits set by the Basin Plan for the Namoi Region.

SOCIAL AND ECONOMIC IMPACTS

There is no cultural flow for First Nations People in either the Peel River or Dungowan Creek.

The EIS did not assess the social and economic impacts of any climate-independent sources of water such as recycling waste water for irrigation, use of industrial waste water. It did not assess the non-infrastructure methods of saving water such as water-wise gardens, tree lined streets and building design appropriate for the climate. These methods of saving water so that our drinking water supply is maintained in a drought is crucial . These “common sense” and relatively inexpensive alternatives should have been assessed.

The angst felt during the last drought was recognised in the EIS. This angst is still present because we do need a secure water supply which has to be cost effective and climate change appropriate and the proposed new Dungowan Dam and Pipeline will not provide this. In fact the angst is increased because this is a very expensive , totally rain dependent open water storage which is subject to evaporation. This dam has been considered not appropriate by a NSW parliamentary Committee, the Federal Productivity Commission, Infrastructure Australia and the NSW Infrastructure Strategy 2022-2042 includes recommendation 31 “Investigate and propose alternatives to the delivery of major dam projects in the Peel, Lachlan and Border River Catchments”. The angst of knowing this dam is a waste of money with unacceptable risks has not been considered by the EIS.

The high price of water will have a negative impact on residents. The EIS recognises this and proposes “that the future service provider may consider offering a temporary exemption from the water price

increase for people who can demonstrate that they are experiencing financial hardship.” Citizens should not have to beg for drinking water. The United Nations Committee states that “the human right to water entitles everyone to sufficient, safe, acceptable, physically accessible and affordable water for personal and domestic uses, including consumption, cooking, personal and domestic requirements. Water , and water facilities and services, must be affordable to all.”

There will be increased pressure on the housing market as there is no rental accommodation in the immediate area of the project and only 16% of Tamworth’s housing stock are rental properties. The rental market is very tight at the moment. There are a number of homeless people in Tamworth but there are no figures available.

The project contractor proposes to provide accommodation on site for 125 workers. There are no medical or recreation facilities near the accommodation site and no public transport is available. This would have a negative impact on these workers and more pressure on Tamworth doctors.

The EIS states that there will be 922 direct and indirect jobs however Figure 4.14. Indicative workforce histogram, shows that the maximum workforce will be no higher than 125 for 3 months towards the end of the first year of construction. The number of workers decreases rapidly and averages around 60 workers until the 3rd month of year 4 when for 8 months there are just under 100 workers, the numbers then rapidly decline and in year six there are about 5 workers. Only 1 or 2 workers are then required for day to day management. It appears to be misleading that the Executive Summary of the report and all articles about this project just mention “up to 125” workers giving the public the impression that the workforce and the economic benefits will be larger than the reality.

The EIS states “ While there is some availability of relevant skilled workers in the local and regional area, a local workforce for highly specialised areas of construction maybe difficult to source and will potentially require the utilisation of workers from outside of the regional area “. This indicates that a large number of workers could be FIFO which means reduced benefits to the economy. The presence of a number of FIFO workers in a community will not result in social cohesion.

FIFO travel adversely impacts Climate Change because of the green house gas emissions associated with travel especially flying.”

ADVERSE IMPACTS ON THE ENVIRONMENT

Impacts on the environment also have social and economic impacts.

The Surface Water Assessment states that “The changes in Chaffey Dam releases and Dungowan Dam releases will both affect flows at Piallamore , with reductions in flow on 40% of days. The magnitude of reductions range from 0-40ML /day for the majority of days, which is moderately significant given the median flow of around 60ML/day.” This will have an impact on at the least farmers and platypus in that area. Citizens of Tamworth can remember the TV and Newspaper photos and articles of a Piallamore farmer's distress of finding dead platypuses which had moved onto farmland to search for water during the last drought.

Platypuses will also be negatively impacted further up the valley . the new Dungowan dam wall will result in a healthy Platypus population being genetically separated.

<https://www.theguardian.com/environment/2022/nov/04/large-dams-may-threaten-survival-of-platypus-populations-research-finds>

The Surface Water Assessment states that there will be a loss of 210sqkm of key fish habitat , including around 192sqkm of type 1 fish habitat and the loss of migration passage for Federally listed Murray Cod, Silver Perch and Eel-tailed Catfish. Offsets for this loss of habitat and native fish are manifestly inadequate. A NSW parliamentary inquiry found that the NSW environmental offsets scheme had serious flaws. <https://www.theguardian.com/australia-news/2022/nov/24/nsw-environmental-offsets-scheme-risks-trading-away-threatened-species-for-cash-inquiry-finds>? The loss of this 210sqkm of fish habitat not only impacts the environment and fish but also impacts First Nations People and recreational fishers.

This project will result in the loss of 185 ha of native vegetation which not only means a loss of habitat, it also means a loss of carbon storage . Within this area the endangered koala will lose habitat, and 57 ha of the threatened ecological community, the Box-Gum Woodland, which will be impossible to replace .

An excess of nutrients released from decomposing submerged vegetation in the dam will result in outbreaks of blue-green algae with the associated health implications to humans and fish.

The EIS states that under certain circumstances the frequency of flooding in Woolomin could increase marginally. That will be an unwanted environmental and social and economic impact on the people of Woolomin.

COMMUNITY ENGAGEMENT

The assistance I have received from a member of the Dungowan Dam team to lodge my submission has been outstanding and phone calls to the 1800 asking about webinars have always been helpful. It was fortunate to have webinars when Covid prevented Public meetings.

I found the public meeting held in the Passchendaele Room in the Tamworth Town Hall in September this year to be really useful as participants able to ask questions of individual on the team before the formal meeting . It was unfortunate that there was a very small attendance.

Unfortunately I found the webinars were repetitious and my questions and those of other participants were often fobbed off. Some people I know only attended a few webinars because they felt information was being withheld and I felt that information was being withheld and maybe some groups were being given different information. This was very disappointing and could not be considered “meaningful, timely, relevant , easy to access or open and inclusive “.

The letter drops did not occur in my area and this was mentioned at 2 webinars. Residents were unaware in advance of the street closures occurring when the pipeline was being installed. The street closures were managed very well.

I did not see any community pop-ups nor was I aware of any occurring.

I am a member of TWSA and I note that it says that the project has consulted with our group, Tamworth Water Security Alliance. That was one meeting held on 22/11/2022 with the Tamworth Regional Residents and Ratepayers Association and was a good idea.

I am not in Landcare but have friends who are . How many Landcare groups were consulted?

I found the following statement in the EIS almost discombobulating "Ensuring the Indigenous community believe their concerns have been considered and addressed." I hope that this statement did not mean fobbing of but that the statement meant ."Ensuring the Indigenous community know their concerns have been considered and addressed."

CLIMATE CHANGE.

The EIS had inadequate information on the issue of GHG emissions from the project when it is being constructed. There was no information I could find on the value of the loss of carbon storage which would occur when vegetation from the inundation and construction area is lost.

There was insufficient information on the emissions from the dam when it is operational from rotting debris especially when the dam is drying out.

BEST WATER SECURITY AND WATER RESILIENCE MEASURES FOR TAMWORTH

The best water security and water resilience measures for Tamworth are to fund \$100M for the waste water industrial plant which will be operational within 2 to 3 years.

Fund at \$150 M the repair of the existing Dungowan Dam and the second stage of the pipeline upgrade .

Continue with the existing sustainable use of water program initiated by TRC.

Change building codes to reflect the need to have water resilient and climate resilient buildings

Fund a state-wide education program to equip the public with knowledge of water-wise practices and knowledge of the use all types of recycled water.

Follow Recommendation 29 of the NSW Infrastructure Strategy 2022-2042"Develop a roadmap for the adoption of purified recycled drinking water, including measures to build community support and demonstrate the efficacy of the technology"

Transparent and Accountable management of the Water in Chaffey Dam .

Use the money available from the cancelled Project SS1-10046 to fund the above and use the remainder to repair NSW roads.

Thank you for accepting my objection to the Dungowan Dam and Pipeline Project SS1-10046.

