

## Submission Objection to Dungowan Dam & Pipeline Project SSI - 10046

**Deadline:** Extended to Friday 9 December 2022

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

This submission is an objection to the project

### Background

The proposed Dungowan Dam in the Peel River catchment is estimated to cost \$1.3 billion to provide only an average of an additional 7,000 ML (million litres) per year and will not secure Tamworth water supply into the future. This water would cost an estimated \$70,000 per ML while much cheaper alternatives are available. It is a very expensive National Party promise, made politically, with no assessment of more beneficial, cost effective long-term solutions that will not damage the natural environment.

### Key points for submission:

1. The Environmental Impact Statement (EIS) fails to comply with the Secretary of Planning assessment requirements (SEARs). The EIS does not:
  - analyse and optimise alternatives,
  - assess all threatened species including those listed under Federal law,
  - provide all assumptions used in modelling
2. The project will not meet its objective to provide the most cost effective or efficient option for securing Tamworth water supply.
  - There is no analysis of the benefits of the proposed Tamworth Regional Council industrial water recycling project.
  - The EIS fails to identify industrial use of town water supply. In Tamworth up to 50% of drinking water supply is used by three large meat processing plants.
  - Options analysis was constrained by terms of reference developed in 2015 and does not reflect current best practice
  - Limited options were analysed in the final business case
3. River health impacts:
  - Loss of 192 km<sup>2</sup> of high quality native fish habitat and loss of migration opportunities for Federally listed threatened Murray Cod, Silver Perch and Eel-tailed Catfish.
  - Dungowan Creek is within the threatened Lowland Darling River aquatic ecological community. Offset measures for impacts on threatened native fish are not adequate.
  - Dungowan Creek and Peel River have a healthy Platypus population that will be genetically separated<sup>1</sup>
  - The loss of flows in the Peel River will cause a failure to meet the Environmental Water Requirements of the Murray-Darling Basin Plan and impact on environmental health of the Namoi River catchment.

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<sup>1</sup> <https://www.theguardian.com/environment/2022/nov/04/large-dams-may-threaten-survival-of-platypus-populations-research-finds>

4. Biodiversity impacts:
  - A significant area of critically endangered ecosystem and Koala habitat will be cleared, including habitat for many other endangered mammal and bird species
  - The EIS fails to assess 18 threatened species known or likely to be in the area of impact including 6 threatened species protected under Federal law such as the Greater Glider and 2 critically endangered plants.
5. Aboriginal cultural heritage impacts
  - Many sites of high cultural significance will be impacted
  - Many sites require further research and not all of the pipeline easement was assessed
  - There are no cultural flow allocations in Dungowan Creek or the Peel River
6. Cost impacts
  - The project does not meet the NSW Treasury guidelines for a cost to benefit ratio of >1
  - The political promise to grant construction costs does not meet current user pays policy for new water infrastructure in NSW
  - Taxpayers of NSW do not want to pay for a project with no cost benefit and significant environmental damage
  - The Federal Productivity Commission deemed the project poor value
7. Social impacts
  - The required workforce will compete with other industries and intensify labour shortages
  - Regional infrastructure spending to fix flood damaged roads should be prioritised
  - Local jobs were not generated by Stage 1 pipeline project – constructed by FIFO workers
  - Local concerns raised about loss of river flows and fish populations
  - Loss of cultural connections and place

Prof Don White