



# Hunter Environment Lobby Inc.

202 High St  
East Maitland NSW 2323  
9<sup>th</sup> December 2022

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

## **Objection to Dungowan Dam & Pipeline Project SSI – 10046**

Hunter Environment Lobby (HEL) is a regional community-based environmental organisation that has been active for over thirty years on the issues of environmental degradation, species and habitat loss, and climate change.

HEL has particular interest in biodiversity and water management issues in the Hunter Region and has held positions on the Hunter River Management Committee, the Hunter and Paterson Environmental Water Advisory Group, the Upper Hunter Air Quality Monitoring Network Advisory Committee and the Paterson Environmental Water Advisory Group.

As well as the expertise we have built up over the last thirty years, we have also had an interest in biodiversity in the greater biospheric region, including that which impacts on the Murray Darling Basin and its aquifers and tributary systems. This is the reason we have had effect to comment on this important issue of the Dungowan Dam and Pipeline Project.

### **Costs to the whole community**

We are told that the proposed Dungowan Dam in the Peel River catchment is estimated to cost \$1.3 billion, which we also believe will only provide 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 political promise with no assessment of more beneficial, cost effective long-term solutions that will not damage the natural environment.

We believe that 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 or provide all assumptions used in modelling

We also see that 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. Also 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. We see that an options analysis was constrained by terms of reference developed in 2015 and does not reflect current best practice. Also there are limited options which were analysed in the final business case

### **Impacts on the Environment:**

River health impacts include 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. This is an important issue we feel.

Dungowan Creek is within the threatened Lowland Darling River aquatic ecological community. Offset measures for impacts on threatened native fish are not adequate. A real concern is that the 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.

### **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. This is not acceptable under any circumstances!

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.

### **Aboriginal cultural heritage impacts**

Many sites of high cultural significance will be impacted - and many sites require further research and not all of the pipeline easement was assessed. Also there are no cultural flow allocations in Dungowan Creek or the Peel River

### **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.

We believe that the taxpayers of NSW do not want to pay for a project with no cost benefit and significant environmental damage – plus the Federal Productivity Commission deemed the project poor value

### **Social impacts**

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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>

The required workforce will compete with other industries and largely intensify labour shortages, this is not a plus for the area. Regional infrastructure spending to fix flood damaged roads should be prioritised, local jobs were not generated by Stage 1 pipeline project – it was constructed by FIFO workers.

Local concerns were raised about loss of river flows and fish populations as well as a loss of cultural connections and place was expected

Yours in trust,

A handwritten signature in black ink, appearing to read 'Jan Davis', is positioned above the typed name.

Jan Davis  
President Hunter Environment Lobby Inc.