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9th September 2012

Objection: Macquarie River to Orange Pipeline Project

Dear Ms Scott,

I am writing to you to object to the proposed *Macquarie River to Orange Pipeline Project* on a number of grounds. By way of introduction I have lived and worked in Bathurst for 40 years and been actively involved in natural resource research at Charles Sturt University, the University of Sydney, and for the last ten years as Principal Consulting Ecologist for Cenwest Environmental Services. One of my specialties is platypus ecology, having studied the Duckmaloi platypus population for 15 years as well as co-jointly developing off-take and environmental flow strategies to facilitate their conservation. As you would be aware, The Duckmaloi River is an upland tributary of the Macquarie River. Furthermore I have been involved in numerous other platypus studies along the eastern seaboard, including within the Orange area. I am also very familiar with the Macquarie River upstream and downstream of Dixon's Long Point.

The platypus is not a threatened species under either the NSW NPWS Wildlife Act 1974 or the EPBC Act, nevertheless it is a protected species within NSW. However it is an iconic species, and one that has been significantly impacted in the upper Macquarie River catchment, including tributary creeks and rivers, since European settlement. Its iconic nature is fleetingly recognized in Section 6.2 (Matters of State Environmental Significance) in the Aquatic Ecology Assessment report.

The Director General's requirements include '..... measures to be implemented to avoid, mitigate, manage, monitor and/ or offset fauna impacts during construction and operation' and '...outline any ongoing management requirements to maintain biodiversity values in perpetuity ...'. In my view implicit in these requirements is the need to assess the potential impacts of the Project on the platypus and to identify appropriate management strategies to avoid or mitigate potential impacts. Furthermore an assessment of platypus was a specific requirement of the Commonwealth's Controlled Action determination.

I am aware of the many water holes upstream and downstream of the proposed off-take location, and their importance as linear refugia for platypus during periods of drought, low and no flow scenarios. The EA dismisses the many observations of platypuses in these water holes as 'anecdotal' when in my opinion, there is a known significant platypus

population upstream of the Burrendong Dam through to the confluence with the Turon River . These large water holes are critical habitat for this species in dry times and under conditions of low flow. We know very little about how water extraction under base and low flow conditions in particular, as proposed in the pipeline project, impact on platypuses, but in my view there is the potential for a significant impact to occur. At the very least a concerted attempt need to be made by the proponent to:

- Quantify the presence of platypus in the impacted section of the Macquarie River under base, and low flow conditions;
- Develop potential impact pathways (e.g. loss of river connectivity, off-take structures, changes in stream flow, pool dynamics etc);
- Assess the potential impacts and ecological implications for the platypus from the project;
- Determine how potential impacts can be mitigated or avoided; and
- Develop an ongoing platypus monitoring program pre and post project development.

I broadly agree with the concerns and issues raised in a separate submission by the Orange and Regional Water Security Alliance opposing the construction of the proposed pipeline and also with the concerns identified by Professor Harris in his appendix in the Alliance submission.

Please contact me if you need further clarification re any matters that I have raised.

Yours Sincerely

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