

SUBMISSION OPPOSING THE PROPOSED MACQUARIE RIVER PIPELINE
FROM
THE ENVIRONMENTALLY CONCERNED CITIZENS OF ORANGE

To Belinda Scott,
Department of Planning and Infrastructure
October 9, 2012.

Dear Ms. Scott,

Our organisation, which represents nearly 100 citizens of the community of Orange, NSW, wishes to lodge an objection to the proposed Macquarie River to Orange pipeline for the following reasons:

The pipeline is not justified because it has been designed to supply an artificially high water demand. The proposal is based on unrestricted daily water use of 404 litres/person/day, which is much higher than recent years' usage in Orange of below 200 litres/person/day.

The pipeline will provide an average of 1616 ML of water /year to Suma Park Dam at a pumping cost estimated to be \$800 000 per year. On average 1300ML/year of this will spill back into the Macquarie River upstream of the pump site. Thus the pipeline will only yield a nett 300 ML/year to Orange's water supply.

There are viable alternative water sources such as Brown's Creek which can better provide for Orange's water security at a lower cost than the pipeline and with far less damage to the environment. Orange Council has selectively and unfairly dismissed these options.

The upper Macquarie which will be impacted by the pipeline is significant habitat for the nationally endangered trout cod (*Maccullochella macquariensis*). Other threatened fish species found in this part of the river include Murray cod, silver perch and catfish. The environmental assessment undertaken by the consultants for the project is seriously deficient in addressing the impact of the pipeline on these fish. For example, only 500 meters of the 27 kilometres of the river to be affected were visually examined. The aquatic ecology report states "The survey undertaken was not intended to serve as a baseline for impact assessment". This is simply inadequate.

Orange City Council has selectively used out of date advice on protecting unregulated river environments from the NSW Office of Water to justify the pipeline project. Council has ignored other policy requirements which could significantly impact on the operation, yields and viability of the pipeline.

The proposed extraction of water from the upper Macquarie at low flows will disrupt fish passage and degrade important habitat values.

Despite the release of the Environmental Assessment, Orange City Council has yet to confirm the actual pipeline route to the river with four different locations being considered, each with different impacts and costs. This invalidates a significant part of the EA. No EA should be placed on public display unless it is complete, and this one is not yet complete-a week before the public exhibition closes and this matter is not yet resolved.

The pipeline will destroy roadside vegetation in good condition, which provides important wildlife corridors and a habitat in an otherwise highly cleared landscape.

The following comment has been extracted from the executive summary to the environment assessment provided by the pipeline consultants to orange city Council: "It is estimated that the project would require the permanent removal of 19.5 hectares of native vegetation. This vegetation includes 7.8 hectares of the Box Gum Woodland, a threatened ecological community listed under the Threatened Species Conservation Act." The consultants apparently believe that if land is provided as an offset to this removal it justifies it. We consider that the removal of mature trees, many with hollows suitable for nesting sites for superb parrots, another endangered species, cannot be justified, and that this project should not be permitted to proceed.

The proposed pipeline route, with associated powerline and access roads will cause disturbance to highly unstable soils structures in very steep terrain , threatening landslides into the river.

A regional water supply solution which services all the localities in the Central West of the state should be developed in place of the project which ignores all localities except Orange. State and Federal grant monies should be used for such a project.

It is considered that Orange City Council has fallen well short of the standard of due diligence required for such a significant development. Not only did a minority of councillors past and present actually inspect the pipeline route and its access points to the river, despite the fact that all councillors received a written invitation to attend a public meeting on the pipeline on Wednesday, September 26, only 2 of the 6 new councillors recently elected bothered to attend.

Conclusion: For all the reasons above it is recommended that approval to proceed with the construction of this pipeline be denied.

Nicholas King
President
Environmentally Concerned Citizens of Orange (ECCO)