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Belinda Scott
Project Manager
Department of Planning and Infrastructure
GPO Box 39, Sydney 2001

Monday 15 October 2012

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Dear Ms Scott

Submission of Objection – Macquarie River to Orange pipeline project (Ref No: 10_0235)

The Nature Conservation Council of NSW (NCC) is a non-profit, non-government organisation representing more than 100 community environment groups across NSW.

NCC objects to the proposed Macquarie River to Orange pipeline ('the project') as a drought relief measure because it is not the best available solution to water security for the Central West region.

The justification to extract water from the unregulated Macquarie River above Burrendong Water Source is based on an inflated water demand projection.

The water to be provided by the project is based on an average use of 404 litres per person per day (L/p/d). Recent domestic water use in Orange has been around 250 L/p/d. A more realistic water demand, inclusive of business and industry use, is between 300-350 L/p/d.

For example, Goulburn water supply is based on a target of 337L/p/d and while Canberra usage is on average 302L/p/d. It is unreasonable for Orange City Council to be relying on the key source of inflow to Burrendong Dam for a higher level of water demand than other major inland centres.

The project aims to provide water security to the population of Orange at the expense of all downstream water users including the Macquarie Marshes.

NCC recommends that all sources of water supply for the Orange region be fully considered and assessed in an open and transparent water planning process as outlined in the National Urban Water Management Principles.

The Environmental Assessment Report ('the report') has not fully assessed the likely impacts of the project that proposes to extract water from significant habitat for nationally endangered and vulnerable native fish species.

NCC notes that the project is considered a controlled action under the *Environment Protection and Biodiversity Conservation Act 1999*. The report is deficient in the quality of assessment and conclusions reached in regard to significant impact, for both aquatic and terrestrial fauna species.

There has been no final biodiversity offset package identified. Therefore, there is no evidence of a commitment by Orange City Council to protect and maintain areas of high conservation value in perpetuity to compensate for the loss of critically endangered ecological communities and breeding and foraging habitat for a large number of threatened species.

NCC is also concerned that a final route and pump site has not been fully identified by Orange City Council. A full assessment of the impacts of all possible project sites must be conducted before the project can be considered at both the State and Federal levels.

NCC recommends that the project be rejected and that the funds granted to Orange City Council by the State and Federal Governments be used to establish an ecologically sustainable water supply to service the growth of the Central West region.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'P. Clarke', with a stylized, flowing script.

Pepe Clarke
Chief Executive Officer