

Att: Belinda Scott  
Project Manager  
Department of Planning and Infrastructure  
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**SUBMISSION OF OBJECTION**  
**Macquarie River to Orange pipeline project - Ref 10\_0235**

The National Parks Association of NSW (NPA) was formed in 1957 to promote the concept of a network of national parks in NSW under specialist national parks and wildlife legislation and managed by a professional agency. Today NPA continues to build on this work through a network of 18 branches and over 5,000 members and supporters. NPA has a long history of working for improved water management, recognising it as an essential element of maintaining the health of wetlands and river systems.

NPA wishes to lodge a strong objection to the proposal to extract water from the upper reaches of the Macquarie River, above Burrendong Dam, for the purpose of securing urban water supply for the city of Orange.

NPA notes that the project is a controlled action under sections 75 and 87 of the *Environment Protection and Biodiversity Conservation Act 1999 (EPBC Act)*.

The Department of Sustainability, Environment, Water, Population and Community has determined that the proposed action is likely to have a significant impact on:

- Listed threatened species and communities (sections 18 & 19 of the *EPBC Act*)
- Wetlands (Ramsar) (sections 16 & 17B of the *EPBC Act*)
- Listed migratory species (sections 20 & 21 of the *EPBC Act*)

NPA is concerned that Burrendong Dam is a primary source of environmental water allocation for the Ramsar-listed Macquarie Marshes, parts of which are protected as a Nature Reserve under the NSW reserve system.

NPA does not accept that the use of the Office of Water IQQM model to assess the hydrological impacts of the proposal on flows to the Macquarie Marshes Ramsar wetland is appropriate.

Flows to this significant wetland area were restricted during the millennium drought because of loss of inflows to Burrendong Dam. This impact has not been adequately addressed in the environmental assessment report and does not fulfill the Commonwealth environmental assessment requirements as provided in Appendix N of the environmental assessment report.

NPA recommends that an independent hydrological assessment of the impacts of the proposal on river flows and inflows to Burrendong Dam be conducted.

NPA is also concerned that the proposal is likely to have a significant impact on nationally endangered native species, declining woodland birds and endangered ecological communities. Federally-listed threatened species that may be affected in the area include the endangered Regent Honeyeater (*Anthochaera phrygia*), vulnerable Superb Parrot (*Polytelis swainsonii*), endangered Spotted-tailed Quoll (*Dasyurus maculatus*), vulnerable Large-eared Pied Bat (*Chalinolobus dwyeri*) and vulnerable Greater Long-eared Bat (*Nyctophilus timoriensis*), as noted in the environmental assessment report; and the endangered Trout Cod (*Maccullochella macquariensis*), for which Gardiners Hole in the Upper Macquarie River is a significant habitat.

The key threatening processes identified in the project assessment have not been adequately avoided or mitigated. This is an indication that the proposal to extract water from the unregulated reaches of the Macquarie River and to construct a pipeline, maintenance road and electricity transmission line through 37 km of heavily disturbed landscape of the central west region is not an ecologically sustainable development.

NPA is concerned that Orange City Council has not adequately examined all possible alternative water sources and management practices to secure a sustainable urban water supply.

NPA recommends that the Department of Planning and Infrastructure reject this proposal on the information provided.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Kevin Evans', followed by a period.

**Kevin Evans**  
Chief Executive Officer  
National Parks Association of NSW