

Our ref: DOC661101

Your ref: SSI-15548591-Mod-1

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Dear Rose-Anne

### **Moomba to Sydney Pipeline – MOD 1 - Compressor Station Installation**

Thank you for your email dated 28 July 2021 to the Biodiversity, Conservation and Science Directorate (BCS) inviting comments on the Modification Application (MOD) for the Moomba to Sydney Pipeline – MOD 1 - Compressor Station Installation.

BCS has reviewed the MOD and understand that the proposal involves the construction of two compressor stations across two sites, MW880 (Stage 1) and MW433 (Stage 2), on the Moomba to Sydney Pipeline (MWP). Permanent ancillary infrastructure to be installed across both compressor stations is inclusive of the following general development components:

- pig catcher and launcher for the MWP;
- small amenities building with water tank;
- wastewater treatment system;
- security fencing; and
- communications tower

The proposed sites for MW433 and MW880 are located within western NSW, approximately 440 kilometres (km) apart. MW433 is located at Round Hill approximately 103 km north of Wilcannia and MW880 is located at Milne approximately 35 km south-west of Condobolin.

BCS understands that the MOD has yet to be referred for consideration under the *Environment Protection and Biodiversity Conservation Act 1999*, and that it is the expectation of the proponent that the project will not be determined to be a controlled action.

BCS's detailed comments and recommendations are provided in **Attachment A**. If you require further information regarding this matter, please contact Ben Ellis, Senior Conservation Planning Officer, via [ben.ellis@environment.nsw.gov.au](mailto:ben.ellis@environment.nsw.gov.au) or (02) 8275 1838.

Yours sincerely



**Renee Shepherd**  
**Acting Senior Team Leader Planning, North West**  
**Biodiversity, Conservation and Science Directorate**

4 August 2021

Attachment A – BCS's Recommendations

Attachment B – BCS's Detailed Comments

## BCS's Detailed Comments and Recommendations

### Moomba to Sydney Pipeline – MOD 1 - Compressor Station Installation

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#### 1. A like-for-like credit report should be appended to the BDAR

Appendix E of the Biodiversity Development Assessment Report (BDAR) contains a Biodiversity Assessment Method (BAM) credit summary report generated from the BAM Calculator (BAM-C). A credit summary report does not contain the detail necessary to determine the credit trading options available for the project.

It is recommended that a like-for-like credit report is also appended to the BDAR. A like-for-like credit report allows all relevant parties including the proponent, BCS and the consent authority to trace the like-for-like credit trading options available to satisfy the credit obligation for the project.

#### Recommendation:

- 1.1 The assessor should generate and attach a Biodiversity Credit Report (like-for-like) from the BAM-C to the BDAR.

#### 2. The proponent should consult with NPWS regarding the project's potential indirect impact on Paroo National Park

Section 8.1.2 of the BDAR identifies the following potential indirect impact resulting from the construction of MW433:

*“Changes to water quality and volume within the internationally-significant Paroo River Wetlands (Paroo National Park) from spray irrigation of wastewater”.*

The discharge of wastewater, specifically via spray irrigation, is identified as a key risk to National Parks and Wildlife Service (NPWS) estate within the *Developments adjacent to National Parks and Wildlife Service lands NPWS Guidelines* (NPWS 2000). The NPWS guidelines state:

*“except for facilities that are directly related to the provision of park visitor or management facilities, wastewater management infrastructure must not be located on NPWS land. Also (with the same exception), there must be no discharge of wastewater to NPWS land, including nutrient or pathogen export from effluent disposal areas”.*

BCS acknowledges that the discharge of wastewater has been addressed in the project's impact mitigation and minimisation strategy. However, it is unclear to BCS if NPWS has been consulted regarding this potential impact to Paroo National Park and the mitigation strategies and protocols proposed. Previous consultation by the proponent with NPWS regarding this specific potential impact could not be confirmed by BCS during the project's exhibition period. As such, BCS recommends that the proponent contacts the NPWS regional office which manages Paroo National Park to discuss:

- the types of approvals that may be required;
- the proposed activity and its potential impact;
- information and communication requirements;
- legal permissibility; and
- NPWS policies relevant to the activity

It is the responsibility of the proponent to ensure all necessary approvals relating to the development in NPWS estate are identified and obtained prior to the activity proceeding.

Recommendation:

- 2.1 The proponent should consult with NPWS regarding the potential impact of wastewater discharge in Paroo National Park.