Submission No 78

INQUIRY INTO RATIONALE FOR, AND IMPACTS OF, NEW DAMS AND OTHER WATER INFRASTRUCTURE IN NSW

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Date Received: 21 September 2020

SUBMISSION TO THE INQUIRY INTO THE RATIONALE FOR, AND IMPACTS OF, NEW DAMS AND OTHER WATER INFRASTRUCTURE IN NSW.

Submission presented by:

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We would like to present the following submission to the enquiry for consideration by the Committee.

Background to this submission.

Our property Ringtree is primarily a beef producer with a small irrigation licence used in fodder production for winter feed and drought back up. We also run a farm stay operation running 3 holiday cabins offering fishing and bush walking to families wishing to enjoy the natural environment.

We are directly affected by the construction of the Mole River Dam with the dam wall being built in the entrance to our farm. This will result in the inundation of a significant proportion of the primary operational area of our property.
This will have a significant impact on our lives through loss of amenity, income thus directly affecting our future livelihood. Having just endured 3 years of drought, we are now in a situation of having to decide to restock and continued with our future development plans for the property. The process to date has placed a significant level of stress on us individually and within our relationship. The interruption to our lives caused by the intrusion of NSW waters contractors operating on our property is also a point of contention especially with no mention of compensation for this intrusion to our lives and livelihood.
Whilst NSW has an obligation to consult widely with stakeholder, their efforts to date in consulting with those directly affected has been dismal. There contact with us has basically been to tell us when their contractors will be accessing our property. Questions posed to them about our situation now and moving forward should this project proceed have been given scant regard with little useful information provided.

To this we offer the following points for your consideration.

Submission considerations.

1. The first point we would like to make is that there has been a number of investigations into the Mole River dam in the past all of which have been rejected on economic grounds.
   "The Jacob's" report presented to Water NSW in 2017 on page 7 also states that none of the options presented for this dam are economically viable.

2. Based on point 1, the investment of 24 million dollars of taxpayer funds into a feasibility study would appear to be a politically motivated decision made by the National party. We feel that this money would have been better spent on more worthwhile projects such a better roads, hospitals and communication networks in the area. Perhaps some of this money could be spent on better policing of the current water licencing regulations which have to date been proven extremely culturally lax from the water minister down through Water NSW.

3. The Mole River dam does not comply with current water sharing plans with QLD and would require changes to the water sharing rules. The building of this dam will reduce the supplementary water flows in the down stream regulated river systems in both states.

4. The Border rivers system is already over allocated and this process seems aimed at securing the water within the system for the large-scale water intensive crops, such as cotton and nuts at the expense of other traditional farming systems. As this dam adds no new water to the system therefore its purpose seems to be to control the flow to suit the cotton and nut farming interests only.
   The Jacob report also expresses the view that there is potential for more area in both QLD and NSW to be used for irrigation and once again the dam adds no new water to the system to allow for the expansion of irrigated crop production. The dam proposal predominately states that it will provide a more secure reliable supply, therefore any increase in irrigated crop area seems unlikely. Perhaps a review of the types of crops produced to find more suitable dryland crops would be a better solution.

5. To date there has been no consultation about impacts on water charges and pricing for water license holders. Most of the farms in the Mole River system are utilised for livestock production and rely on their unregulated water supply to grow much of their winter feed and to build fodder storages for drought years. Once the river is dammed it will become a regulated river and put their water allocations at risk or make the cost of the water excessive. This will place the viability of their businesses at substantial risk. The economic statements to date all refer to the downstream gains to cotton and nut industry but fail to consider the economic losses that will be imposed on the current farming enterprises in the system. The scoping report states that “Improved on-farm productivity. The primary and most direct intended benefit would be improvement of on farm productivity as a result of more reliable and secure water supply to existing licence holders. Irrigators would be able to grow more of their existing crops and to use a portion of their land to grow higher value crops”, once again it fails to mention that this appears to relate only to general security licence holders not supplementary licence holders. The scoping report states that 28,300 ML of supplementary water would have to be removed from the system. Based on our own licence entitlement of 60ML that means there are going to be a lot of small to medium farming operations may lose out and placing them at financial risk.

6. At present the Murray Darling basin plan has enforceable sustainable diversion limits. To meet the current levels 36GL of water needed to be recovered from the northern rivers to date less than 50% has been recovered. Of that 36GL only15 of 29 has been recovered from QLD and 3 of 7 from NSW. Is it the intent of the NSW government through Water NSW to use the removal of unregulated water licences currently held by farms along the Mole River valley to cover the deficit in its MDB plan obligations? Under the MDB plan no new licences can be created from investments in water supply. Are the existing licences going to be extinguished or converted to general security licences substantially increasing their cost of water?

7. Part of the political spin placed on the dam is that it will secure water supplies for rural towns, Tenterfield, Jennings and Stanthorpe for example. Most proponents of the dam in Tenterfield seem to believe that it is to secure town water for drought years, documentation would indicate all water is intended to be used for downstream irrigation only. There is no documentation referring to pipelines to these towns in any reports to government. Estimates for the Dungowan pipeline is $100 million, no such allocation of funds is presented for this dam to secure town water supplies.
   Therefor there is no justification for the project to be designated as Critical State Significant Development under the NSW Water Supply (Critical Needs) Act 2019. The Mole River Dam will not supply water to Tenterfield or other towns or supply critical human needs This also appears to be the case in the Dungowan dam as well, even the Mayor of Tamworth in a press release stated he cannot get a response from Water NSW as to whether there will be an allocation set aside for the city.

8. In the lead up to the adoption of an interim limit on diversions across the Basin in 1995, the MDBMC established the Independent Audit Group to audit the increasing volumes of water being diverted from the rivers of the Murray–Darling Basin. The audit found a significant and unsustainable growth in diversions placing stress on environmental health and reliability of supply (MDBMC 1995, 1996).
   In relation to low to moderate flows, the States agreed “to maintain or improve low to moderate flows in the Border Rivers by the: i) preservation of part of the tributary inflows to the Border Rivers through to Mungindi, during periods of regulated flow from 1 September to 31 March ii) protection of natural flows in the upper reaches of the Dumaresq River (Note: This same protection will also apply in the Severn/Macintyre and Barwon Rives from Goondiwindi to Mungindi) iii) protection of moderate flows in the Macintyre and Barwon Rivers from Goondiwindi to Mungindi.” Following the 2008 IGA, the NSW prepared the water sharing plan for Border Rivers unregulated.
   The building of this dam will further restrict the environmental flows through the Mole River valley and associated down stream river systems

9. The NSW border rivers surface water resource plan published in 2018 uses data regarding river flows recorded in 1969 at Donaldson and also stated that these figures are skewed upwards in relation to actual annual flows. Even using the figures contained in the report, the proposed 100GL dam would take 333 days based on the reported 299ML daily flow. The current flow on 20/09/20 is 17.7 Ml and in the past month has not exceeded 250ML. Typical daily flow data used in this report states that average daily flows in the period 1969 to 2017 have not exceeded150Ml day. As we live on the river, we can also factually state that there has been zero flow in 2018 and 2019. Since the 1 in 100 year flood event in 2011 the river has not had a single year in which there was not a no flow period. These no flow periods have ranged from 1 to 3 month periods. In the 18 year period we have owned Ringtree there has been a noticeable ever decreasing flow pattern in the river. This would suggest that the flow data being used to justify this dam are misleading and do not take into account declining rainfall patterns being caused by climate change.

10. The MDBA, High Ecological Value Aquatic Ecosystem (HEVAE) framework consists of five key criteria (diversity, distinctiveness, naturalness, vital habitat and representativeness). Unregulated rivers in the following water sources have very high or high ecological value as assessed by HEVAE and relevant to alteration of flows. It states that the Mole River has high diversity value. It lists the Mole River as having a high diversity value.
    The interruption of natural flow patterns will directly affect that ecological value. The river contains a number of threatened and endangered fish species, Murray Cod, Eel Tailed Cat Fish, and also the Purple Spotted Gudgen found in its tributaries.

11. The NSW border rivers surface water resource plan also states that “changes to riparian vegetation reduce the geomorphic condition of rivers, and reductions in geomorphic condition from good to moderate are linked to reductions in macrophyte and macroinvertebrate assemblages (Brierley and Fryir’s 2005, Chessman et al. 2006a). The abundance of freshwater mussels declines in river reaches where geomorphic condition is reduced (Jones and Byrne 2010).” Once again how will the altered natural flows affect the geomorphic condition of this river.
    There is very little information in this proposal to suggest if any consideration is being given to the effects of altered flows in the Mole River system.

12. The Cooperative Research Centre for Freshwater Ecology in a paper titled: "Does flow modification cause geomorphological and ecological response in rivers? A literature review from an Australian perspective" indicates the high level of destruction to riparian ecologies where natural river flows are altered to provide reduced flows. There is little indication of any real studies into the ecological consequences of this dam before it was placed on the critical infrastructure list. The rushed studies being performed at present to be included in the final business case would indicate that ecological affects of the dam are of little concern relative to the political need for this dam.

13. The EPBC Act referral estimates the total project are to be 829 hectares. It also states that "Potential direct impacts rising from the proposed action include impact on an estimated 778 ha of native vegetation, including 15.5 ha of Box Gum Woodland TEC through clearing during construction and inundation of the community during operation. Potential changes to surface water hydrology, water quality, cold water pollution, and flooding may also have adverse direct and indirect impacts on native vegetation and the Box Gum Woodland TEC upstream and downstream of the dam, however further modelling will be required to quantify and assess the potential impacts. This native vegetation and TEC is likely to comprise suitable threatened species habitat for the identified threatened species.".
    The following list included in the referral indicates the flora under threat from the dam proposal:

Acacia macnuttiana	MacNutt's Wattle V
Acacia pubifolia	Velvet Wattle V
Acacia pycnostachya	Bolivia Wattle V
Almaleea cambagei	Torrington Pea V
Astrotricha roddii	Rod's Star Hair E
Boronia granitica	Granite Boronia E
Cadellia pentastylis	Ooline V
Callistemon pungens V	
Dichanthium setosum	Bluegrass V
Eucalyptus nicholii	Narrow-leaved Black Peppermint V
Grevillea beadleana	Beadle's Grevillea E
Haloragis exalata subsp. velutina	Tall Velvet Sea-berry V
Lepidium peregrinum	Wandering Pepper Cress E
Leucopogon confertus	Torrington Beard-heath E
Phebalium glandulosum subsp. eglandulosum	Rusty Desert Phebalium V
Picris evae	Hawkweed V
Rutidosis heterogama	Heath Wrinklewort V

14. Much of this flora is essential to providing suitable environmental conditions for many of the endangered species also found on the dam location. The following list of endangered species was included in the referral.

Anthochaera phrygia	Regent Honeyeater CE
Grantiella picta	Painted Honeyeater V
Lathamus discolor	Swift Parrot CE
Rostratula australis	Australian Painted Snipe E
Dasyurus maculatus	Spotted-tailed Quoll E
Nyctophilus corbeni Corben's	Long-eared Bat V
Phascolarctos cinereus	Koala V
Pseudomys novaehollandiae	New Holland Mouse V
Pteropus poliocephalus	Grey-headed Flying-fox V
Anomalopus mackayi	Five-clawed Worm-skink V
Underwoodisaurus sphyrurus	Border Thick-tailed Gecko V
Petauroides volans	Greater Glider V
Petrogale penicillata	Brush-tailed Rock-wallaby V
Erythrotriorchis radiatus	Red Goshawk V
Geophaps scripta	Squatter Pigeon V
Chalinolobus dwyeri	Large-eared Pied Bat V
Litoria booroolongensis	Booroolong Frog E

15. The Scoping report identifies a growth in a stable local population consisting in a higher skilled workforce. With this dam supposedly only going to increase security of supply, how does this trigger an increase population. The local communities already have a highly skilled workforce servicing the existing network of farms and businesses.
    The Tenterfield council believes that the dam will increase tourism to the area for recreational fishing. Once again many of the farms along the river already have camping and recreational fishing operations as part of their business operations. The dam will significantly diminish this business opportunity. Being a fisherman myself impoundment fishing has nothing on wild river fishing experience. Once again it appears a case of benefits for others and losses for those most affected.

Conclusion

The Border Rivers are one of the last remaining free flowing river systems left in this state. They provide an increasing rare opportunity to conserve the high value natural habitats they create. They provide a significant conservation opportunity for many endangered flora and fauna. They provide natural breading grounds for many aquatic species from Murray cod, Platypus and many endangered invertebrate species. With Australia facing an extinction crisis for its native species the continued interruption of ecosystems by projects like these is deplorable.

The justification for the dam to improve water security for downstream general security license holders is not justifiable. There is no proof that improvement to general security licence holder operations is greater than the losses incurred to affected farms in the Mole and the general border river systems.

A decision to build this dam seems politically motivated to support well healed corporate farming operations. The premise may also be used that after COVID 19 the state will need to build infrastructure projects like these to promote economic recovery in the bush. I believe that there are far worthier projects to be found that would benefit rural NSW and allow it to develop better agricultural, environmental and social outcomes.

Thank you for the opportunity to have my voice hear at this enquiry. I look forward to receiving the findings of this enquiry as we believe there are a lot of unanswered questions around the decisions to build these dams.

Kind Regards
Bruce & Helen Norris