

EPBC Act Referrals Section,  
Environment Assessment Branch,  
Department of Environment and Water Resources,  
Canberra.

**RE:- REFERRAL NO 2008/3960. SUGARLOAF INTERCONNECTOR  
PIPELINE.**

**INTRODUCTION.**

My name is Malcolm Calder.

I am a retired Professor of Botany from the University of Melbourne and a former Member of the Victorian Land Conservation Council, and Chair of the Yarra Catchment Committee of the Port Philip and Western Port Catchment Management Authority.

I am President of the Yarra Glen and District Township Group and I chair the 3775 Pipeline Group.

I am writing this submission on behalf of the community of Yarra Glen and District and of Healesville Environment Watch, the non-government environment group representing the Ririe Ward in the Shire of Yarra Ranges.

The proposed Sugarloaf Pipeline is planned to pass through this region of the Yarra Valley entirely within the Ririe Ward. The final alignment of the proposed pipeline is not yet made public, but it will most certainly impact severely on all aspects of our community life. Our region is renowned for its high value and high intensity rural landholdings, particularly the vineyards, the horse studs, the beef cattle enterprises and fruit orchards. The district is a major tourist destination for good food and wine and as a retreat for the people of Melbourne and beyond. Major regional festivals are held in Yarra Glen each year and the town is a significant growth centre for commuters and people wishing to experience life in a country town

The people of Yarra Glen and District have high environmental values, surrounded on two sides by native forest and with direct access to the Yarra River, as well as the billabongs and flood plain of the Yarra. The local bush provides great opportunities for walking, cycling, horse riding, and the Yarra Valley Racing Centre has a complete programme of race meetings and other events.

Our district is one with the highest environmental values, a strong and intensive economy, a committed community with a determination to maintain a high quality of life.

My initial comments are of a more general nature and these will be followed by specific comments on the Referral of Proposed Action.

## **OBJECTION TO PROPOSED REMOVAL OF WATER FROM GOULBURN RIVER.**

There is a fundamental flaw in a policy of taking water from the Goulburn/Murray catchment and across the main divide into the Yarra catchment. This policy is particularly stupid given that the Goulburn/Murray/Darling catchment is already in severe water stress. There is no valid case for taking this water to Melbourne.

The Victorian Government claims (p4, “Our Water Our Future”) that the Food Bowl Modernisation Project will “generate new water” by reducing system losses. This is a deceptive claim. System losses come from leakage to ground water, evaporation from open channels, and from inefficient irrigation meters which deliver more water than measured.

Leakage of old pipes is currently a part of the ground water component of the water cycle. To stop it will reduce ground water locally, not create “new water”. Evaporation from open channels is an element of the atmospheric component of the water cycle so humidity and cloud formation will be reduced locally. Again this is not “new water”. Similarly improved systems of measuring the water delivered to irrigators is not creating “new water”, it is simply ensuring that irrigators get what they pay for.

So the basic claim of generating new water is wrong. The policy is based on a fallacy. The truth is that the project is taking 75Gl of water from the over-stressed Goulburn/Murray catchment and delivering it to Melbourne.

Elsewhere I have written objecting to this policy See attachments 2 and 3

## **GENERAL COMMENTS ON THE REFERRAL**

The Referral submitted to the Department indicates in several places that the information needed for final consideration by the Minister is incomplete. I find this extremely unprofessional and offensive when we as members of the public are expected to provide informed comment on a specific project to assist the Minister in his determination. For instance there is no final determination of the alignment of the pipeline from the township of Dixons Creek to Sugarloaf. This is a critical part of the proposal for those of us who live in this area, and we are left in the dark! We are experiencing uncertainty, rumor, speculation and fear. We deserve more respect from the Alliance and from the Government.

The Referral fails to mention the widespread opposition to the proposed pipeline along its 70km length. There are many valid reasons why the community finds the proposal unacceptable and the Minister should be made aware of the near universal objection expressed by the community. The Referral talks of community and landholder consultation, but many landowners have refused access to members of the Alliance or their consultants, others have not been contacted at all. It is wrong to suggest that public consultation has been comprehensive and good.

## **SPECIFIC COMMENTS ON THE REFERRAL.**

### **2.4 Size of the development footprint or work area:-**

This Referral states that it is not possible to determine the impact on 90ha of forest because the mode of construction in this location is not determined. For those of us concerned with the impact on natural forest communities this is an impossible situation. How can we comment? What decisions will be made without our input or comment? It is a joke!!

#### **Lot description:-**

Apparently the Alliance is unable to provide a complete list of lot numbers, given that the final route of the pipeline has not been determined. Another joke!

#### **Description of proposal:-**

Second dot point. "The affected area will be re-vegetated with locally endemic grass and shrub species". This is not enough information. For instance in some situations it will be necessary to re-establish high quality pasture. Rebuilding of farm infrastructure and fences will be needed, and in places it would be appropriate to plant trees. The statement on rehabilitation needs to indicate a greater understanding of the sort of damage that will be created.

This section is silent on the need for construction access and on-going, long-term management access through private property to the easement. During construction, vehicle access will cross private land which will be compacted and severely impacted. How will these areas be managed and what will be the ongoing rehabilitation of these accesses? We need more understanding of the impacts.

### **3.3. Previously considered alternatives and the "do nothing" case:-**

Comment on alternatives through the Yarra Valley area can't be made since the final alignment through our area has not been decided. The Yarra Glen and District Township Group and the 3775 Pipeline Group have indicated one option which would be least damaging and the only one they could accept for comment. (see attachments 2. and 3)

This Referral is extremely negative on the “do nothing” option. There are many alternatives to taking Goulburn/Murray water to Melbourne. This whole proposal seems to be based on the single statement here that it is “simply not feasible to adopt a do nothing case”. Without reference to any data we are told that water storages for Melbourne will be reduced to around 21% by mid 2010. Where has this figure come from and what about other policies such as the better management of storm water in Melbourne, the development of water recycling, establishing more realistic water pricing to businesses and home owners in Melbourne and so on?

Why take water from a parched Murray/Darling catchment to supply a city that has not taken steps to manage water more effectively?

**A staged development or component of a larger project:-**

I claim that this referral is part of a much larger project. The Government of Victoria published “Our Water, Our Future” in 2007. In this it is clearly indicated that the Sugarloaf Interconnector project is one element of a multi-pronged plan to augment Melbourne’s water supply. I consider the Alliance statement to be untrue and misleading.

**4.2(b) Water flows etc:-**

No mention of Dixons Creek or Steels Creek as waterways to be considered. Does the Minister not need to know?

**4.2(h) Current state of the environment:-**

No comment on the aquatic or riparian environment of the Goulburn River downstream of the off take. What is the impact of this policy on the ecological sustainability of the Goulburn River Surely this is critical information for the Minister to make an informed decision.

Where is there comment on the environment of the Dixons Creek or Steels Creek environment?

**4.2(m) Existing land uses:-**

How inadequate to describe the land south of the Toolangi State Forest as being used primarily for viticulture and tourism. Obviously these are important land uses for our region. This region has a high population of landowners with small acreage, but many carry out highly productive orchards, stud cattle farms, beef enterprises and horse studs and adjustments. There are horticultural enterprises and other forms of intensive agriculture. The information provided to the Minister is totally inadequate.

## 6. Measures to avoid or reduce impacts:-

### **Rehabilitation of disturbed areas:-**

This is not an adequate commitment. Not only does revegetation with indigenous species need to occur in areas of native vegetation, but there needs to be ongoing monitoring of the rehabilitated sites to ensure that environmental weeds, favored by environmental disturbance, do not take over.

Furthermore, there is no statement on the rehabilitation of land committed to primary production, such as grazing land, orchards and vineyards.

We need written contracts with the various landholders to detail the processes and management of land rehabilitation after the pipeline has been laid. The comment on auditing on page 15 suggests that the commitment to rehabilitation ends on the completion of the construction phase. This is not good enough.

There is no statement made in this Referral on measures taken to maintain biosecurity. Heavy machinery is widely recognized as a dispersal mechanism with a number of soil-bourne pathogens, such as Phytophthora, and Phylloxera, and weed species. The Alliance needs to indicate in detail the measures proposed to avoid the spread of weeds and pathogens along the length of the pipeline.

## 8. Key reasons.

**From my comments above it is clear that this referral document does not provide “clear and accurate information” on the impact of this project.**

**Not all landowners have been consulted.**

**The proposal is based on a regionally flawed policy of removing water from a parched catchment of national significance to a city which has many other options for water management and supply.**

PREPARED BY MALCOLM CALDER

21/01/08