

Maurice Schinkel

3rd June 2008

Mr. Greg Wilson
Chairman
Essential Services Commission
Level 2
35 Spring Street
Melbourne VIC 3000

Dear Mr. Wilson,

This is a comment on the paper, Essential Service Commission 2008, 2008 Water Price Review, Melbourne Water Drainage and Waterways Water Plan 2008 – 2013 - Draft Decision, May.

I note the lack of consideration in the document of the cost of the **proposed** desalination plant, on Waterways Services and Drainage.

The proposed desalination plant would create unaccounted for costs on Waterways Services and Drainage in the following locations:

- at the site of the proposed desalination plant
- along the route and easement of the proposed power supply
- along the route and easement of the proposed pipe to take the water to Melbourne
- at the site of proposed pump stations.

At the proposed **site of the proposed desalination plant**, being the following parcels of land:

- Lot 1 on Plan of Subdivision 501595, Volume 10907 Folio 010
- Lot 2 on Plan of Subdivision 501595, Volume 10907 Folio 011
- Lot 1 on Plan of Subdivision 538458, Volume 10985 Folio 540
- Lot 2 on Plan of Subdivision 201963, Volume 09658 Folio 544
- Lot 1 on Plan of Subdivision 201963, Volume 09658 Folio 543
- Crown Allotment 23A Parish of Wonthaggi, Volume 3798 Folio 500

(see enclosed extract from the document:
Department of Sustainability and Environment
Capital Projects Division
Desalination Project
Environment Management Plan
Preliminary Works),

there are many issues that pertain to Waterways, and possibly Drainage. The above DSE document illustrates some of these issues and should be obtained and thoroughly examined by Melbourne Water and the Essential Services Commission.

In addition, the document,

'Scoping Requirements
Desalination Project
Environment Effects Statement
Issued by Minister for Planning
May 2008'

contains matters that are relevant to Waterways, and possibly Drainage, and should be obtained and thoroughly examined by Melbourne Water and the Essential Services Commission.

Further, there are a series of referral documents to the EES that contain matters of importance to Waterways and possibly Drainage at the proposed site of the proposed desalination plant. These documents should be obtained and thoroughly examined by Melbourne Water and the Essential Services Commission.

Also, researchers in the areas of:

- surface water and soils
- noise and vibration
- land based flora and fauna
- design of plant and pipeline
- transport, traffic and roads (see enclosed advertisement from the South Gippsland Sentinel Times of April 22, 2008)

are preparing the EES. Melbourne Water and the Essential Services Commission should make contact with the above researchers because their work will have immediacy to Waterways and possibly Drainage at the proposed site of the proposed desalination plant.

It is obvious both Melbourne Water and the Essential Services Commission cannot currently make an assessment of the costs to Waterways services, and possibly Drainage services at the site of the proposed desalination plant.

Along the **route and easement of the proposed power supply** for the proposed desalination plant are a myriad of issues that have resonance for Waterways and Drainage services but yet none of these are alluded to in the paper because no reference is made to the proposed desalination plant. This is a failing of the paper, and as is required in relation to the **site**, further documentation and information must be obtained to determine the true cost to Waterways and Drainage.

Enclosed please find the DSE document 'North-South Grid Connection'.

Along the **route and easement of the proposed pipe to take the water to Melbourne** are many crossings of waterways and potential bore fields. These include the Powlett River, the Bass River, Adams Creek, Lang Lang River, Yallock Creek, McDonalds Drain and Cardinia Creek.

The non-inclusion in the paper of the consideration of the proposed desalination plant, and the proposed route of the transfer pipeline is a major deficiency because of the enormous impact the easement would have on Waterways and Drainage. Enclosed is page 4 of the document,

'Scoping Requirements
Desalination Project
Environment Effects Statement
Issued by the Minister for Planning
May 2008',

which shows the proposed route of the transfer pipeline.

It should be obvious that this easement crosses many waterways, but yet the Draft Decision Paper has not considered it.

Again, consideration must be made of all available documents and expertise.

The **site of proposed pump stations** will have a considerable impact on Waterways and Drainage but this is not considered in the paper.

It is impossible at this stage for Melbourne Water and the Essential Services Commission to know the cost to Waterways and Drainage Services of the proposed desalination project.

It is apparent Melbourne Water has made no endeavours to ascertain the cost, and the evidence of this is the non-inclusion in the paper of consideration of the proposed desalination plant.

The true cost of the proposed desalination project to Waterways and Drainage Services can only be obtained through the EES process – which is not near completion.

Only an abandonment of the desalination proposal would allow the cost to be immediately determined – the cost being zero if the desalination proposal was abandoned.

If the Essential Services Commission wishes to proceed with its Draft Decision it can only do so on the basis that the desalination proposal is abandoned.

It is clear both Melbourne Water and the Essential Services Commission must advocate for the abandonment of the desalination proposal.

Yours sincerely,

Maurice Schinkel

enc. extract from EMP detailing 6 parcels of land advertisement from South Gippsland Sentinel Times, April 22, 2008

DSE 'North – South Grid Connection Overview'

Page 4 of 'Scoping Requirements'

Department of Sustainability and Environment

Capital Projects Division

Desalination Project

Environment Management Plan Preliminary Works



GLOSSARY AND ABBREVIATIONS

AAV: Aboriginal Affairs Victoria

Contract Risk Register: The Contract Risk Register maintains records of all contract risks, including the environmental risks identified in the WPEMP. The register also includes details regarding the frequency and level of surveillance required and person responsible to undertake it.

Desalination Project: The design, construction and operation of a seawater desalination plant, including tunnels connecting the plant to offshore intake and outlet structures, a water transfer pipeline connecting the plant to Cardinia Reservoir, power supply infrastructure and other ancillary works.

DEWHA: Department of the Environment, Water, Heritage and the Arts

DPCD: Department of Planning and Community Development

DSE: Department of Sustainability and Environment. The DSE plays a dual role in the planning and delivery of the project.

As the proponent, the DSE Capital Projects Division is responsible the planning and delivery of the Desalination Project;

As part of its legislative and statutory requirements, various functions and regions of DSE have the responsibility to administer legislation and ensure that the Desalination Project is properly assessed and overseen to ensure compliance with all relevant legislation and policy.

EPA: Environment Protection Authority

Environmental Incident: Any incident occurring that has caused, or has the potential to cause, appreciable pollution or damage to the environment, including failure to implement any permit and/or approval conditions, or mitigation measures, that were included as part of the project approval process.

FFG: Flora and Fauna Guarantee Act 1988

HDD: Horizontal Directional Drilling

Plant Site: The land on which the Desalination Plant is proposed to be constructed, comprising:

- Lot 1 on Plan of Subdivision 501595, Volume 10907 Folio 010
- Lot 2 on Plan of Subdivision 501595, Volume 10907 Folio 011
- Lot 1 on Plan of Subdivision 538458, Volume 10985 Folio 540
- Lot 2 on Plan of Subdivision 201963, Volume 09658 Folio 544
- Lot 1 on Plan of Subdivision 201963, Volume 09658 Folio 543
- Crown Allotment 23A Parish of Wonthaggi, Volume 3798 Folio 500

Project Delivery Team (Project Team): The Project Management Team established by DSE to prepare and manage the contractual requirements for the delivery of the preliminary works on behalf of DSE.

RAP: Registered Aboriginal Party(s)

SEPP: State Environment Protection Policy

Work Package: A defined package of preliminary work activities, delivered under as a unit of work, usually under a separate contract.

Victoria's Desalination Project

Have your say on environmental studies Register now to meet researchers on 4 or 5 May

The Department of Sustainability and Environment invites you to contribute to the Desalination Project Environment Effects Statement (EES) studies by providing an opportunity to meet the researchers preparing the EES.

Technical and scientific researchers will be available to discuss EES studies on plant, marine and pipeline including:

- marine environment
- visual impacts
- surface water and soils
- · energy use
- noise and vibration
- · social and economic effects (housing, employment)
- land based flora and fauna
- indigenous and European cultural heritage
- · design of plant and pipeline
- waste management
- · transport, traffic and roads

You are invited to provide information to the researchers or to ask them questions about their studies.

Individuals, or groups of up to six people, may register to book a 20 minute appointment with one or more researchers on:

• Sunday, 4 May 2008 from 2:00 - 6:00 pm or;

• Monday, 5 May 2008 from 4:00 - 8:00 pm.

Bookings

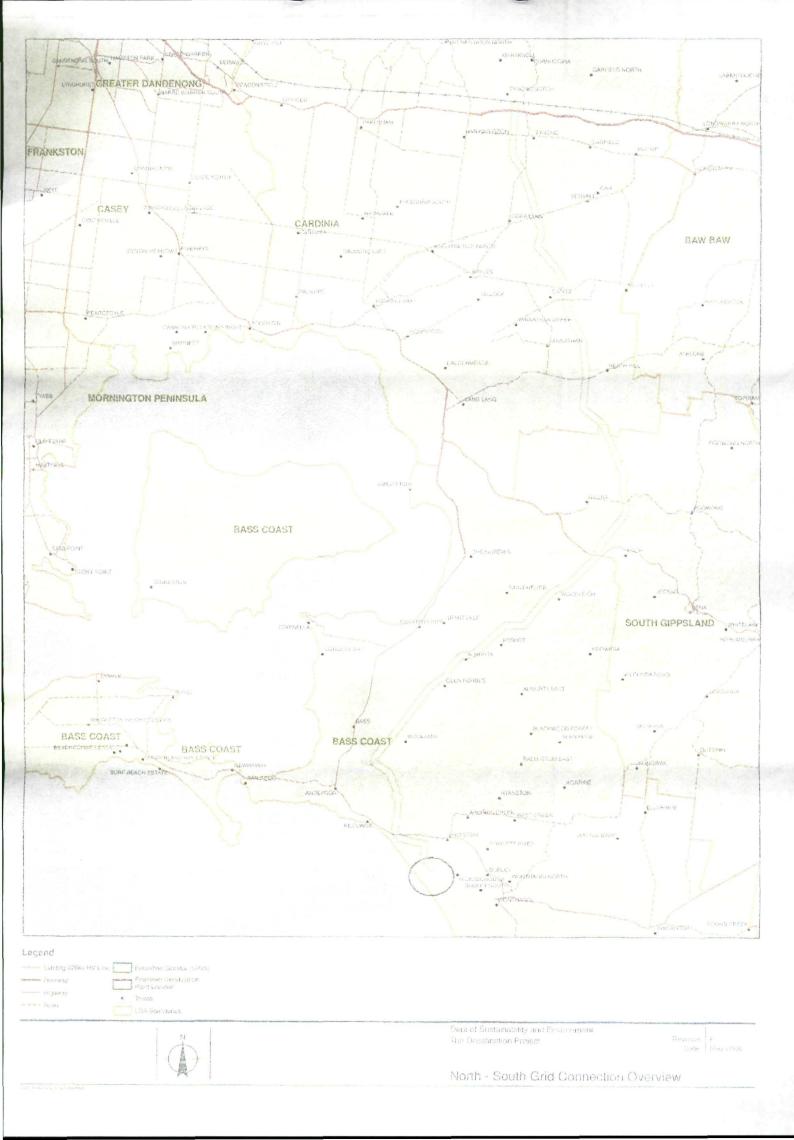
Telephone Peter West on 0427 409 619. Email peter.west@dse.vic.gov.au Telephone the Desalination Project Information Office on (03) 5672 1624.

Venue

Wonthaggi Secondary College, Dudley campus, South Dudley Road.



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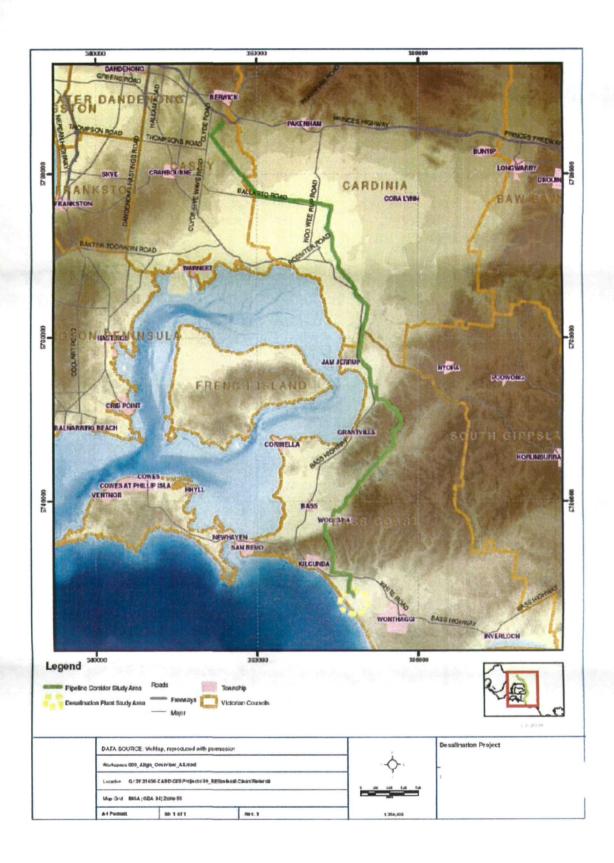


Figure 1 General location of the Desalination Plant and Transfer Pipeline

2 Project Information

2.1 The Proposal

The Desalination Project works that are subject to the requirement for an EES consist of these components:

- 1. A reverse-osmosis seawater desalination plant, initially capable of providing up to 150 gigalitres (GL) per year of potable water, and potentially to expand to 200 GL per year;
- 2. Two tunnels (in the order of 0.8 to 2 km length) connecting the desalination plant to offshore structures located in the Bass Strait, respectively for seawater intake and the discharge of the saline concentrate;
- 3. A pipeline from Wonthaggi to Berwick, largely laid underground in a trench, to transfer water from the plant to Melbourne's water supply system;
- 4. Infrastructure to supply 90 to 120 megawatts of electricity for the operation of the plant (the likely form and siting of this infrastructure is not yet known); and
- 5. Other ancillary works.

The proposed location of the plant and the water pipeline route is shown on Figure 1. It is proposed to deliver the project by 2011.

The following preliminary works to inform design and environmental investigations, which are not part of the capital works described above, are not subject to the requirement for an EES:

- 1. Geotechnical drilling and sampling to determine site conditions, including onshore and offshore drilling and horizontal directional drilling from onshore entry points, as well as digging of test pits;
- 2. Installation of pipes into horizontal directional drill holes from onshore entry points to offshore positions;
- 3. Construction of offshore marine structures above the seabed for seawater intake and discharge;
- 4. The construction and temporary operation of seawater sampling units;
- 5. The installation and operation of one or more pre-treatment and/or desalination pilot plants of a maximum aggregate capacity of 6 megalitres (ML) per day;
- 6. The provision of power and water supply that is adequate for the construction and operation of the works described above.

Though these latter works are excluded from the EES, they are variously subject to approval under the *Planning and Environment Act 1987*⁴, the *Environment Protection Act 1970* and the *Coastal Management Act 1995*.

⁴ An environmental management plan for these works is to be approved before they commence.