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Warragamba Dam Assessment Team
Department of Planning Industry and Environment

<https://www.planningportal.nsw.gov.au/major-projects/project/10571>

Warragamba Dam Wall Raising SSI-8441 – Submission on PIR and RtS Reports

The Southern NSW Branch of BirdLife Australia welcomes the opportunity to comment on the Preferred Infrastructure Report (PIR) and the Response to Submissions Report (RtS).

BirdLife Southern New South Wales (BLSNSW) is a community group of local people committed to the protection of native birds and their habitats. We are part of BirdLife Australia, the national partner of BirdLife International, the world's largest nature conservation partnership with over 13 million supporters. BirdLife Australia is independent and not-for-profit, with over 200,000 active supporters nationally including 72,000 in NSW.

BLSNSW strongly opposes the proposal to raise Warragamba Dam because of its unacceptable adverse environmental effects on the Blue Mountains World Heritage Area and threatened species. In particular, all the available evidence shows that the proposal will destroy scarce breeding habitat of the Regent Honeyeater which has been observed breeding at sites within the area of upstream impacts of the Project. No new information offered in either the PIR or the RtS alters that compelling conclusion.

The Regent Honeyeater is listed as Critically Endangered at both a state and federal level, with as few as 350 individuals remaining in the wild across their range. Modelling by BirdLife Australia suggested that up to 50% of contemporary Regent Honeyeater foraging and breeding habitat was burnt in the 2019/20 bushfires and therefore protecting remaining unburnt breeding habitat is of the highest conservation priority.

Given that the Regent Honeyeater is Critically Endangered, any breeding habitat is considered critical for the survival of the species under the National Recovery Plan for the species. There are only a handful of remaining breeding sites for Regent Honeyeaters. Destruction or degradation of any of those sites, including those affected by the Project, would have dire consequences for the species as a whole. It is unacceptable and inconsistent with the National Recovery Plan for any avoidable loss or degradation of breeding habitat to occur at the instigation of a NSW government agency. It is also incongruous with the time and money that the federal and NSW governments have invested into the recovery program, including the Regent Honeyeater Captive Breeding and Release Program. This matter is particularly important to BLSNSW as our volunteers have donated a significant amount of time for more than 25 years in monitoring and in habitat restoration activities.

BLSNSW would like to again point out that the EIS exhibited and relied on in the PIR is not an accurate assessment of the impact of the Project on the Regent Honeyeater. While the

EIS concludes that the Project is likely to have a significant impact on this species, we understand that details of the magnitude of this impact have been altered from that of the original expert scientists' advice and that the scale of impact will be far greater than what is claimed in the EIS. In particular, we refer to the impact assessment for the Regent Honeyeater commencing on page 356 of EIS Appendix A - Assessments of significance of Appendix F5: Matters of National Environment Significance – Biodiversity. In our response to the EIS last year, we requested that the EIS be revised to reflect the original reports of the ecologists as published by the ABC. However, we note that rather than take that position, the PIR asserts without relevant evidence that its "precautionary" approach in the EIS in then assessing the Regent Honeyeater as significantly impacted by the Proposal, "may have been overly conservative, and that some assumed impacts, such as the total loss of environmental values in the upstream impact area, may not actually be realised." We consider that statement to be without foundation, speculative and misleading, based as it is on inadequate evidence and wishful thinking. In support of the proponent's latest contention, the PIR relies on claimed further studies into the distribution of tree species said to be required for suitable Regent Honeyeater breeding habitat and claiming that such habitats are more widespread than realised before. The implication is that if feed species can be found, then why not suppose that that is where Regent Honeyeaters will probably be found? The PIR also speculates that "temporary inundation" of the Regent Honeyeaters' habitat is unlikely to significantly affect the species' capacity to survive and breed. No evidence is offered as to how this can be so. We are utterly puzzled as to how these self-serving statements by the proponent can be backed up by scientific evidence. "temporary inundation" is undefined by the proponent in terms of likely regularity and extent of rainfall and flooding events in the decades ahead. The common person would assume that all inundation is temporary, yet the proponent implies that being temporary makes it less destructive, again without evidence. We say that in the context of this Project, temporary or any other kind of inundation is a direct threat to the survival of the critically endangered Regent Honeyeater.

The PIR also continues to falsely claim that the impacts of the Project can be adequately addressed through biodiversity offsetting, offering amendments suggesting that offset localities will now be focused mainly at "on-park" localities. In substance, these amendments amount to nothing as a solution for the Regent Honeyeater. Offsets are rarely an appropriate response to proposed biodiversity loss and especially for habitat critical for the survival of a species, such as breeding habitat for the Regent Honeyeater. Given their scanty numbers and limited distribution, there is no evidence that current breeding habitat for Regent Honeyeaters in the Project-affected areas can be successfully offset, even in on-park locations. Any offsets pursued would be unlikely to provide measurable benefits for either the local affected population or remnant populations still hanging on elsewhere. BirdLife and associated groups have for many years been undertaking efforts to improve Regent Honeyeater habitat in areas outside the Burratorang Valley, such as in the Capertee Valley, and to support captive breeding and release programs across the state. If those efforts alone were likely to induce rapid repopulation of the species in the target remediated areas, then by now increased breeding populations would be expected to be found. However, this has not occurred. The process is slow and easily set back by environmental threats such as climate change induced bushfires and rainstorms affecting food stocks and the incursion of competing species, such as the Noisy Miner. Our long experience demonstrates that efforts to create new habitats over time for Regent Honeyeaters, such as via a vague and inevitably

slow-moving offsets mechanism, is no substitute for the need to preserve existing habits for a species that today is on the cusp of extinction.

So, we find the proposition that offsets will remedy the critical endangerment of the Regent Honeyeater as intellectually insulting to all the experts in environmental science who know it to be nonsense, a false promise that can only accelerate the decline of a species at a time when, in late 2022, state and federal governments including the NSW government, are now talking about urgently pursuing a “zero extinctions” policy nationwide. And of course, it is not just the Regent Honeyeater that is threatened by this Project. The EIS and the PIR also fails to consider the magnitude of the impacts on biodiversity with no mention that the Project is likely to adversely affect the survival of 85 threatened species and threatened ecological communities (TECs), including significant impacts on 63 species and TECs that are already threatened with extinction. This level of destruction from a single project is absurd and completely unacceptable to most people, except perhaps those who hang hopefully on to the dubious and exaggerated claim that raising the wall will save downstream properties from inundation. We say that offering species extinctions as a worthwhile price for saving properties, as the proponent’s agents and allies make very clear in political announcements in recent months, offers only a fool’s choice: building the wall will not solve the problem of downstream flooding in a world that will continue to get hotter and wetter, courtesy of climate change.

On the basis of the significance of the impact of this project on the Regent Honeyeater and other threatened species, we again urge the government to abandon the Project and instead consider alternative ways to mitigate the effects of floods in the Hawkesbury-Nepean Valley.

Yours sincerely



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