

Our Ref: FE22/174

14 December 2022

NSW Department of Planning and Environment,

Re: Parramatta Light Rail Stage 2 - EIS (SSI-10035)

Thank you for your referral of the Parramatta Light Rail Stage 2 EIS (SSI-10035) to DPI Fisheries for review.

DPI Fisheries is responsible for ensuring that fish stocks are conserved and that there is no net loss of key fish habitats upon which they depend. To achieve this, DPI Fisheries ensures that developments comply with the requirements of the *Fisheries Management Act 1994* (namely the aquatic habitat protection and threatened species conservation provisions in Parts 7 and 7A of the Act, respectively), and the associated *Policy and Guidelines for Fish Habitat Conservation and Management (2013)*. In addition, DPI Fisheries is responsible for ensuring the sustainable management of commercial, recreational and Aboriginal cultural fishing, aquaculture, marine parks and aquatic reserves within NSW.

DPI Fisheries has reviewed the EIS and supporting documents in the NSW Major Project Portal. DPI Fisheries has no objections to the project, in principle. However, DPI Fisheries does not support the method for offsetting impacts to marine vegetation outlined in the EIS (Chapter 16 – Biodiversity). DPI Fisheries will not accept a compensation payment for harm to marine vegetation unless Transport for NSW undertakes a thorough offset feasibility analysis and demonstrates that there is no potential for on-ground offset works in the Parramatta River estuary.

Harm to mangroves and saltmarsh must be offset at a ration of 2:1. The estimated areas of harm and required on-ground offsets are outlined in the table below:

Marine vegetation type	Area of harm (m2)	Area of offset (m2)
Mangroves	9,100	18,200
Saltmarsh	500	1000

DPI Fisheries has been contacted by the Sydney Olympic Park Authority (SOPA) in relation to potential mangrove rehabilitation projects in the Newington Nature Reserve and the Badu Mangroves in Bicentennial Park, adjacent to the proposed Parramatta Light Rail. DPI Fisheries is confident that Transport for NSW will find ample opportunity for on-ground mangrove and saltmarsh rehabilitation if it liaises with the appropriate agencies and environmental groups, such as SOPA and the Parramatta River Catchment Group. I have included contact details for both these groups below.

Sydney Olympic Park Authority:

Kerry Darcovich – Kerry.darcovich@sopa.nsw.gov.au

Swapan Paul – Swapan.Paul@sopa.nsw.gov.au

Parramatta River Catchment Group:

Nell Graham - Nell.Graham@canadabay.nsw.gov.au

DPI Fisheries recommends that the EIS be revised to reflect these offset preferences, and provide consistency with the *DPI Policies and Guidelines for Fish Habitat Conservation and Management (2013)*.

If you require any further information, please do not hesitate to contact me on sarah.conacher@dpi.nsw.gov.au

Yours sincerely,



Sarah Conacher

Senior Fisheries Manager, Coastal Systems