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Sally Munk
Principal Planner, Industry Assessments
Department of Planning, Housing and Infrastructure / Major Projects Division
State Significant Development Application SSD - 41680467 / Auskelp Pty Ltd
sally.munk@planning.nsw.gov.au

Dear Ms Munk,

Re: State Significant Development Application SSD - 41680467 / Auskelp Pty Ltd

I am writing to you in relation to the proposed industrial development / major project at Disaster Bay south of Eden NSW. A development of this nature has no place adjacent to a Wilderness Area or near a pristine, coastal environment and within its waters.

I have serious concerns, “red flags” and indeed considerable objections to the proposal; those concerns heightened by reading a Marine Scientist’s interpretation of the EIS.

This submission however, focusses primarily on Wilderness. The primacy of Wilderness and Wilderness Values is paramount. Those values - especially in the face of “environmental” installations that may indeed be intended to offset damage elsewhere such as carbon pollution and a consequent rise (globally) in atmospheric and marine temperatures - cannot be underestimated.

Ms Munk, as a person whose first real “experience” of nature - an extraordinary sense of belonging and beauty for a three or four year old - was indeed within the Nadgee Wilderness area (Nadgee Fauna / Nature Reserve was first set aside in 1957, the year of my of birth). The beach was stunning. The amazing expanse of pristine sand and endless ocean stretching ahead was not lost on me, even at that age. Indeed, it was that primary impression of nature, that formed me as a person. Over the course of my life - and in fact for so many of my siblings under the tutelage of our father and ecologist, the late Dr Alec Costin - I became a naturalist and advocate for nature, for the mountains, the Snowy River and now, the Nadgee Wilderness.

In fact, just a few weeks ago coinciding with the NSW Sea Kayak Association gathering in Twofold Bay, it became clear to me, that the privilege of learning to kayak and camp on the wilderness coast of the far south of NSW is something that, at my young age of not quite 70 years old, I definitely want to do. Privilege is the word that is appropriate. We are just so privileged in Australia, in NSW and especially on the Sapphire Coast, to have the availability of natural spaces whether they be forest, beach, ocean or river. The history, the legacy of National Parks is something that one must never take for granted Sally.

Think about that history for the moment - the influence of Yellowstone National Park established 1 March 1872 and then only seven years later, the declaration of The National Park south of Sydney on 26 April 1879, later renamed Royal National Park after the visit of Queen Elizabeth II in 1955. Indeed, the evolution of NSW National Parks over time, under the custodianship of various Premiers, means that the recognition, the understanding that national parks were closely allied to public health, recreation and to protect natural landscapes from development, was indeed sound.

In the case of Beowa National Park (formerly Ben Boyd National Park), we have witnessed extensive consultation with the Indigenous community in terms of the selection of the new name for the National Park, and in so doing, have honoured their presence and custodianship over millennia.

This is no small thing. Custodianship. Please outline who in the Indigenous Community were consulted in relation to this project and their views and relationship with Womboyn, Disaster Bay and Nadgee.

As a state government, the NSW Government and its departments are also charged with the responsibility of custodianship - the custodianship of declared natural spaces, National Parks and Wilderness Areas. In this context, the primacy of custodianship must take priority in the hierarchy of responsibilities over enterprise, industry and associated employment no matter the pecuniary outcomes for the individual, corporation or the state itself. We are all Custodians of Beowa National Park and should honour this role and privilege in perpetuity, preparing as we can, next generations to also respect, guard and protect Beowa National Park's unique landscapes.

Ms Munk, I understand that the new legislative instruments SSI/SSD are extraordinarily powerful pathways - subject to consent by the Planning Minister - for the building of infrastructure, no matter the setting. From the point of view of the classification of this infrastructure, it appears to be "*not necessary*" however is at first glance logistically convenient to the proponent. There may be additional incentives for the location of the proposed Kelp Farm. The proposed development is clearly *NOT* critical infrastructure - indeed it may on balance produce more carbon emissions than it sequesters along with other environmental damage and deficits - and hence is exposed to Land and Environment Court Action by the public if approved.

The question of course is, “who will pay if a Court challenge ensues; the proponent, or the legislature that approved the proposal in the first place? Who will bear the cost of any environmental damage, legal costs arising and economic losses?”

It is incumbent upon us all to ask how this proposal gained the status of SSI/SSD? It appears that the proponent is also acting in every confidence of gaining the approval of the Planning Minister and that confidence is contemporaneously visible through investments in property and signage in Eden. Further the allocation of government funding and a lease area for a kelp hatchery near Edrom Lodge Twofold Bay also signals approval in principle. Although the East Boyd Bay / Fisheries Beach / Edrom area is lightly industrialised through wharf and chipmill infrastructure, it nevertheless retains scenic qualities and is critically, home to the Weedy Seadragons, also affected by climate change, warmer ocean temperatures and the habitat loss including kelp forests and seagrass.

Twofold Bay it is protected from the worst of the seas and weather that frequently visit Disaster Bay. The prevailing weather and intense systems including strong swells and superimposed on those swells are big seas. The largest wave recorded at Greencape by the Manly Hydraulics Lab was 17.7 metres. This is a definite red flag for the proposed location for the kelp farm, with inevitable issues of damage to kelp farm infrastructure and subsequent pollution, whale entanglement and other marine life devastation. Disaster Bay is patently *the wrong location* for the proposed kelp farm.

Perhaps we can visit the matter of *Wilderness vs SSI* from the point of view of Wilderness. On balance, the evolution of entire ecosystems and ecosystem engineering through location and other factors IS in fact **State Significant Natural Infrastructure**. Wilderness. The landscape in question, the Nadgee Coastal Wilderness, evolved over 500-450 million years ago. The ancient Gondwana flora and fauna was gradually replaced as Australia drifted northwards. The glacial and interglacial periods and eventual warming were intricately connected to the formation of the intact Nadgee coastal Wilderness, a landscape complete with sand dunes, beach ridges, wetlands, lagoons and perched swamps. Aboriginal occupation ensued over tens of thousands of years with light, *reversible* interactions with the coastal region. European occupation generated the majority of significant impacts in this landscape over time as a result of uncontrolled fire in a global warming sequence.

Protective legislative instruments have however, recognised and largely conserved the Nadgee Wilderness.

So that brings us to the matter of the complete exposure of the protective legislation to the evolution of SSD / SSI planning pathways - a most recent and potentially devastating impact on nature conservation, on the legacy of National Parks and pertinently on the last of the great coastal wildernesses, Nadgee.

Ms Monks, I am sure that you will agree, that our instruments for building infrastructure are absolutely no match for natural geological processes and interlinked landscapes and unique ecosystems.

Indeed, the common view locally, is that Disaster Bay will be simply that, a disaster for this proposal. Disaster Bay is NOT a calm and enclosed marine environment. Historically, and meteorologically, it is one of the most exposed stretches of temperate coastlines in southeastern Australia. It is a dynamic, high-energy wilderness area shaped by instability. Disaster Bay has resisted human occupation because of these very features.

In my submission, I have focussed primarily on the concept of Wilderness and its importance to nature conservation and to human health. Please find a comprehensive search of the notion of Wilderness in the attached documents as a part of this submission. They will be lodged as separate documents.

The summary is most clearly, *Wilderness Values must take precedence.*

Ecos Australia comprehensively does not support the proposed kelp farm at Disaster Bay until such times a more comprehensive environmental mapping takes place.

May we propose a “pause” on infrastructure development until such times, that a more comprehensive environmental mapping project is instigated and completed. Ideally, this would be up to five teams with five individuals over five years to including mapping ecological values and wilderness values from Red Point to Cape Howe. By all means, AUSKELP can participate, using its already dedicated funding and vessel, to the mapping project that must include **whale migrations**, dolphin and other marine species, sea birds and ecosystems of the Greencape rocky shore, Disaster Bay and the Nadgee Costal Wilderness. May we also recommend that a **Hydrophone** be placed at Greencape for at least three years to ensure better data collection in relation to whale migration and presence in the vicinity of other cetaceans. This project must wait until at least three years

Statewide Dolphin Count

We owe nature that much. We owe our predecessors, our First Nations Peoples, the Custodians of this beautiful, wilderness coastline that much. We owe it to ourselves to be better informed. We owe more comprehensive research to the proponents of the proposed kelp farm that much, to be better informed and to collaboratively, build respect for the ocean and its connected coastal ecosystems.

Thank you Ms Munk.



Acacia Rose
Director
ECOS Australia Foundation
0402 298 821