



Birpai Local Aboriginal Land Council

Objection to the Thrumster Wastewater Scheme

Application Number SSI-56980459

Submitted by: Rebecca Richards (Property Manager)

Date: 19/05/2025

As an advocate of the Birpai Local Aboriginal Land Council, I strongly object to the Thrumster Wastewater Scheme for the following reasons:

1. Destruction of Aboriginal Cultural Heritage

The proposed development site lies within Birpai Country and holds significant cultural value. Despite the identification of 38 Aboriginal artefacts (Table 24, PAD 1, AHIMS ID #30-3-0390), the investigation was conducted with only 10–20% ground visibility—rendering the study inadequate. The low artefact count under these conditions indicates a high likelihood of further cultural material being present. Yet the assessment has prematurely dismissed this potential.

Furthermore, Birpai LALC was not properly engaged in the site inspection process, nor consulted in line with the **NSW Aboriginal Land Rights Act 1983** or heritage best practice. This oversight undermines the cultural due diligence obligations of both the proponent and relevant authorities.

We request:

- Immediate pause on project approval;
- A comprehensive Aboriginal Cultural Heritage Assessment conducted in full partnership with Birpai LALC;
- The opportunity to provide a revised cultural heritage report for formal consideration.

2. Environmental and Cultural Risk

The site also poses serious environmental risk to endangered species such as the Giant Dragonfly, Swift Parrot, and Slender Marsdenia, among others. The project's documentation fails to consider the totality of national environmental significance and the irreversible impact of habitat loss—especially on floodplain areas known to host sensitive ecological systems.

Additionally, the concurrent Cobarra Water Supply Scheme has documented naturally occurring asbestos. There is a risk that contaminated soil or water may be used at the Thrumster site. No testing provisions are stated in the EIS, raising concerns for neighbouring families and children in the area.

3. Lack of Transparency and Incomplete Reporting

Birpai LALC is extremely concerned about the exclusion of stakeholders and omission of key reports, such as:

- Strategic Wastewater Management Plan (Beca HunterH20, 2023d)
- Discharge Operation Assessment (Feb 2024)



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- Sewer Scheme Connection Response (April 2025)
- Feedback from the Birpai Traditional Owners Corporation

The engagement process has lacked transparency and does not reflect fair or culturally appropriate consultation. The absence of Birpai LALC in discussions about discharge into Partridge Creek and other sensitive areas is unacceptable and fails to meet proper standards of stakeholder engagement.

Conclusion

I call for the Department of Planning, Housing and Infrastructure to:

- Suspend the project and halt all planning approvals;
- Initiate a full review of the Environmental Impact Statement, Response to Submissions, and amendment documents;
- Re-engage with Birpai LALC and the wider community;
- Publicly release all previously withheld documents;
- Consider relocating the project to a more appropriate and less culturally sensitive site.

Yours

sincerely,

Rebecca Richards
Property Manager
Birpai Local Aboriginal Land Council