

## **Warragamba Dam Raising Project SSI-8441**

Submission by Oatley Flora and Fauna Conservation Society Inc. (OFF)

Oatley Flora and Fauna Conservation Society Inc. (OFF) strongly objects to this proposal. The grounds for our opposition are listed below, after background information on our Society.

Our organisation has been active in protecting environmental values for more than 65 years. Our Mission Statement is *Working to protect, conserve and enhance the natural environment locally and globally since 1955*. We currently have more than 300 members, many with qualifications in the natural sciences and in engineering.

Our monthly meetings attract an audience of 40-50 and are addressed by professionals with expertise in environmental fields. In May 2019 a member and former OEH natural heritage officer who has been undertaking faunal surveys in the Warragamba Catchment Area since 1997, spoke to our members on the significant biodiversity values of the Temperate Grassy Box Woodlands of the Burratorang Valley. At the same meeting the video “Give a Dam: flooding the Blue Mountains” was screened, illustrating the cultural heritage values of the area for the Gundungurra People, and the wilderness scenery and wild rivers and streams, particularly the Kowmung and Kedumba, so valued by bushwalkers.

Our members have also seen at firsthand the Burratorang valley within the Warragamba Catchment Area. We have participated in many authorised bi-annual bird surveys for the Birdlife Australia National Regent Honeyeater (Critically Endangered) and Swift Parrot (Endangered) programs. We have seen the great diversity of fauna that inhabits the area, including a suite of threatened bird species as well as Platypuses, Emus, Dingos, Common Wombats, White-bellied Sea-eagles, Eastern Grey Kangaroos and Red-necked Wallabies. Most sightings were in the valley floors, often in, or close to, shallow natural waterways – the very ecosystems that would be periodically inundated and so irrevocably damaged if the dam wall were raised.

In September 2019 OFF made a submission to the Legislative Council Select Committee on the proposal to raise the Warragamba Dam Wall, in opposition to raising it.

Authorities with a far greater knowledge and understanding of the Warragamba Catchment Area than our organisation has, have expressed concerns about the preparation of this EIS, or outright opposition to the project. They include:

UNESCO World Heritage Committee  
Dept of Agriculture, Water and the Environment (DAWE)  
Insurance Council of Australia  
Wollondilly Council

The UNESCO World Heritage Committee considers raising the Warragamba Dam wall to be the most significant threat to Australia’s World Heritage in decades.

The Australian Dept of Agriculture, Water and the Environment pointed out that the EIS failed to evaluate impacts on plants and animals other than species listed as threatened and endangered and even these didn’t receive adequate survey and assessment. For example only 15 hours spotlighting was undertaken across the entire study area for endangered arboreal mammals such as the Koala, Squirrel Glider and Greater Glider. The EIS did not consider significant fauna such as the iconic Platypus (which may warrant threatened status) and aquatic macroinvertebrates.

In February this year, the Insurance Council of Australia said it could no longer support the plan to lift the Warragamba Dam wall and called on the NSW government to find alternative methods to reduce flood risks in the Hawkesbury-Nepean valley.

In an extraordinary meeting the Wollondilly Council has unanimously condemned the NSW Government's plan to raise the Warragamba Dam wall, noting that the area to be inundated as a consequence of the proposal, was entirely located within the Wollondilly LGA.

Oatley Flora and Fauna Conservation Society objects to the proposal because:

- It will have a serious deleterious effect on the ecological values of the Greater Blue Mountains National Parks and other Reserves, and the Blue Mountains World Heritage Area. These are areas of national and international significance, not merely state significance
- Nearly 5,000 ha of World Heritage national park, 1,800 hectares of Wilderness Areas and 65km of wilderness rivers (including a designated 'Wild River', the Kowmung) will be permanently scarred by sedimentation, erosion and invasion of exotic plants.
- Flora and fauna (including *Eucalyptus* species recognised for Outstanding Universal Value under World Heritage listing), Threatened Ecological Communities, critical feeding and breeding habitat of the Critically Endangered Regent Honeyeater and Sydney's last Emu population, will be severely impacted.

The proposal has failed:

- to take into account the effect of the recent 2019/2020 summer bushfires on ecological communities and individual species of fauna and flora; no surveys were done after the fires despite 80% of the WHA having been burnt post-EIS evaluation
- to adequately explore sacred and archaeological sites (only one quarter of the potentially-flooded area was surveyed), AND the NSW Government failed to obtain prior and informed consent from the Traditional Owners, the Gundungurra People
- consider impacts on iconic species like the Platypus and Koala.

Members of our organisation were privileged to see two Platypuses swimming up the Wollondilly River on one of our bird surveys. Regarding Koalas - the Koala scat search period for the EIS for the entire study area was reportedly shorter than four hours; an appropriate survey period for an area of the size that could be inundated, would be more than 100 hours. By comparison, a recent survey of Heathcote NP took over 600 hours of searching for scats, scratches and individuals across a considerably smaller area, to locate 32 individual Koalas but in doing so, identified a significant and previously unknown population of probably 100 koalas.

The rationale for raising the height of the dam wall – to reduce the risk of future flooding to residents and businesses across Western Sydney - is deeply flawed because:

- Historical records of floodwaters that have impacted the floodplain show that almost 50% came from rivers entering below the Warragamba catchment.
- Raising the dam wall will encourage more development in flood-prone areas. As early as 1810, Governor Macquarie recognised the need to carefully plan land use on the floodplain to protect settlers from inundation and frequent losses. The insurance industry has recognised that allowing further building on this area is inherently risky. It is the unsuspecting buyers who will suffer loss, not the developers who will have divested themselves of responsibility.
- Better urban planning is needed to reduce flood risks, not raising the dam wall which would only provide a false sense of security and encourage housing on flood-prone areas. The Insurance Council of Australia considers the Hawkesbury Nepean floodplain to have the highest single flood exposure in New South Wales due to the natural flood hazard and significant and growing population and development across the floodplain.
- The proposal relies on biodiversity offsets to compensate for the irreparable environmental damage the construction of the dam wall will cause. But there is no comparable area with the biodiversity of this unique and internationally significant area that could be an offset.

- Calculations based on the NSW Government's own biodiversity laws and offsets trading scheme suggests that the total cost of biodiversity offsets will be around \$2 billion, but the EIS does not calculate the biodiversity offset liability for the project.

Alternatives to raising the dam wall must be considered to reduce flood risks for downstream communities. They include lowering the full supply level of the existing dam, improved evacuation routes, and moving people off flood-prone land, including consideration of buybacks.

For the NSW Government to plough ahead with this ill-conceived project is to condemn many of its citizens to physical danger and financial loss, to deprive Indigenous people of their connection to significant cultural sites, and to further endanger many already threatened plants and animals.