

National Parks Association of the ACT Inc.

conservation education protection

Warragamba Dam Assessment Team Planning and Assessment Department of Planning, Industry and Environment Via: Warragamba.DamEIS@dpie.nsw.gov.au

Submission – Warragamba Dam Raising Project – SSI8441 – National Parks Association of the ACT – Acton ACT

The National Parks Association of the ACT ("NPA ACT") is a community-based conservation organisation with more than 60 years of experience in helping to protect our natural environment.

We object to the proposed raising of the Warragamba dam wall due to the impacts that this development would have on the upstream natural environment.

Key Points

The original building of Warragamba dam saw the inundation of Burragorang Valley. While there was significant destruction of key ecosystems as a result of this, it was partially justified through the need for improved water supply for the Sydney region. This new proposal will again result in the flooding of large areas of native wildlife habitat, that have been protected by inclusion in the water catchment area without adequate justification. The fact that this destruction involves areas listed as World Heritage raises the impact of this destruction to international importance.

The increase in the height of the dam wall will not lead to significant flood protection, the major justification for this proposal, as nearly half of all flood waters in the Penrith region arise in other water catchments.

Detailed Points

The extent of the destruction to the natural environment under this proposal is astounding. It affects areas listed in UNESCO's World Heritage list in recognition of its Outstanding Universal Value as well as, areas protected under the *National Parks and Wildlife Act 1974* (NPW Act). Of particular concern is the effect on the Kowmung River, listed under the NPW Act as a "wild river" due to its natural importance.

The destruction of land within the World Heritage area is a clear breach of Australia's obligations under the World Heritage Convention and has the potential to see the removal of that listing, which would have a significant impact on tourism in NSW.

It is estimated that 65 kilometres of wilderness rivers, and 5,700 hectares of National Parks, will be damaged by the raising of the dam wall. This is a significant area of damage to NSW's conservation estate and is particularly concerning as it also affects threatened ecosystems and species such as grassy box woodlands and the regent honey eater. These effects have not been fully

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explored in the Environmental Impact Statement (EIS) for the project as a result of insufficient field surveys.

The primary objective of the proposed raising of the dam wall is to achieve flood mitigation, yet 45% of all flood waters in the Penrith region will not be controlled by this and there will be a continuation of flooding despite the project. If the project proceeds NSW will impose significant environment loss on its natural heritage with no significant flood mitigation gains. In light of this, the NPA ACT calls upon the NSW Government and the Department of Planning, Infrastructure and Environment to implement alternative controls for flood mitigation and to place bans on any further developments in areas of high flood risk.

Other matters

The NPA ACT has not made any reportable political donations in the previous two years.

There are no details in this submission, including specific details of the NPA ACT, that cannot be published on the internet.

Should you require any further information on our comments or our organisation, please do not hesitate to contact the NPA ACT office, attention of Mr Rod Griffiths, convener, NPA ACT Environment Sub-committee.

Yours sincerely

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Esther Gallant President National Parks Association of the ACT

19 December 2021

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Rod Griffiths Convener, Environment Sub-committee National Parks Association of the ACT