



18<sup>th</sup> December 2021

Warragamba Dam Assessment Team  
Planning and Assessment  
Department of Planning, Industry and Environment  
Locked Bag 5022  
Parramatta NSW 2124

## **Objection to Warragamba Dam Wall Raising Project – SSI-8441**

Thank you for the opportunity to comment on this proposal.

Blue Mountains Bird Observers Inc (BMBO) is a community-based Incorporated Association [Registration Number INC1600261] with over 200 members, concerned with the welfare and protection of Australian native birds, in particular those in the Greater Blue Mountains Key Biodiversity Area (KBA). The main objectives of BMBO are to encourage birdwatching, stimulate knowledge about and appreciation of birds and to promote the conservation and protection of native birds and their habitat.

BMBO has over 200 members between Penrith and Lithgow including a number of leading members of the Australian birding community. Our activities include collecting and collating data on bird species found in the mountains. We are affiliated with BirdLife Australia and maintain close links with many Birding and Field Naturalist groups in New South Wales through the Bird Interest Group Network (BIGNet).

Several of our professional members have been involved in environmental (flora & fauna) survey work in the areas that would be affected, and some members are connected to First Nation advocates.

### **BMBO objects to this project in toto, because:**

- We strongly oppose the proposal to raise Warragamba Dam due to the project's unacceptable potential impacts on the environment including to the Blue Mountains World Heritage Area and threatened species.
- The draft EIS concludes that the project poses potential significant impacts to contemporary breeding habitat for the **Regent Honeyeater** that "cannot be avoided or minimised."
- The **Regent Honeyeater** is listed as Critically Endangered at both a state and federal level, with as few as 350 individuals remaining in the wild.

- Modelling by BirdLife Australia suggested that up to 50% of contemporary **Regent Honeyeater** foraging and breeding habitat was burnt in the 2019/20 bushfires. Protecting remaining unburnt breeding habitat is of the highest conservation priority.
  - There are only a handful of contemporary breeding sites for Regent Honeyeater and during the assessment of the project a total of twenty one (21) **Regent Honeyeaters**, including active nests, were recorded within the impact area.
  - Any breeding habitat is considered *habitat critical for survival* of the species under the **National Recovery Plan for Regent Honeyeater** and it states “*It is essential that the highest level of protection is provided to these areas and that enhancement and protection measures target these productive sites*”.
  - The destruction or degradation of a contemporary breeding site for **Regent Honeyeaters** would have dire consequences for the species as a whole.
  - The destruction and degradation of breeding habitat for **Regent Honeyeaters** is incongruous with the time and money that the Federal and NSW Governments have invested into the recovery program, including the **Regent Honeyeater Captive Breeding and Release program**.
  - **It is unacceptable and inconsistent with the National Recovery Plan for any avoidable loss or degradation of breeding habitat to occur.**
  - We strongly oppose the Project’s offset strategy for the Regent Honeyeater.
  - Offsets are rarely an appropriate response to proposed biodiversity loss and especially for critical habitat for the survival of a species, in this case breeding habitat for the **Critically Endangered Regent Honeyeater**.
  - There is no evidence that breeding habitat for Regent Honeyeaters can be successfully offset, and any offsets would be unlikely to provide direct benefits for both the local affected population and the species.
  - Threatened species surveys are **substantially less than guideline requirements**. Where field surveys were not adequately completed, expert reports were not obtained.
  - Destruction or compromising the currently available breeding areas for the **Regent Honeyeater** will inevitably reduce the species’ ability to increase its population and most likely result in fewer birds in the already critically small total population.
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- Only **27%** of the impact area was assessed for **Aboriginal Cultural Heritage**.

- Over **1541 identified cultural heritage sites** would be inundated by the Dam proposal.
  - The Aboriginal Cultural Heritage Assessment Report has been severely and repeatedly criticised by both the Australian Department of Environment and the International Council on Monuments and Sites (ICOMOS) for not appropriately assessing cultural heritage in meaningful consultation with Gundungarra community members.
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- **Alternative solutions** to flooding of the Cumberland Plain must be properly considered.
  - On average, 45% of floodwaters are derived from areas outside of the upstream Warragamba Dam catchment. This means that no matter how high the dam wall is constructed, it will not be able to prevent flooding in the Hawkesbury-Nepean Valley downstream.
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For these and many other publicly available reasons, BMBO strongly recommends rejection of the proposal.

Thanks again for the opportunity to comment on this vitally important issue.

Sincerely

A handwritten signature in blue ink that reads "Paul Vale". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Paul Vale  
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BMBO accepts the Department's submissions disclaimer and declaration.

**Declaration:** Blue Mountains Bird Observers Inc. do not donate to any political party or action. No reportable donations have been made in the past 2 years.